Safeguarding For All Policy

Scope of Policy: All students, Staff and Contractors

Issue Date: February 2022

Review Date: February 2023

Approved by:
Kelly-Ann Gordon - Principal

Safeguarding for All Policy

Purpose

The Eastern School of Performing Arts (ESPA) is committed to a whole organisation approach to safeguarding and promoting the welfare of all its students, staff, volunteers, visitors, contractors and partners. Any reference in the policy to a child applies to all those aged under 18. ESPA's legal duty includes the education and training of adults at risk. Any reference in the policy to an adult at risk applies to anyone over the age of 18 who may, for a variety of reasons, require community services and / or be unable to protect him or herself from significant harm or exploitation.

Scope

This policy applies to all students including apprentices and particularly children, young people and vulnerable adults who may need support and all staff, volunteers, partners and families living and working at ESPA. To help ensure that children and adults at risk are protected from abuse, all complaints, allegations or suspicions will be taken seriously, following this policy detailed herein.

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The Policy Statement

ESPA fully recognises its responsibility for safeguarding under the Education Act 2002, Care Act 2014 and the Education and Training (Welfare of Children) Act 2021. ESPA acknowledges its responsibility to adhere to other statutory guidance and bodies including:

- Keeping Children Safe in Education (2021)
- Working together to Safeguard Children (2018)
- Sexual Violence and Sexual Harassment between Children in Schools and Colleges (2018,2021)
- Sharing nudes and semi-nudes: advice for education settings working with children and young people (2020)
- NPCC When to Call the Police (2021)
- Preventing and Tackling Bullying, DfE (2017)
- Prevent Duty guidance for further education revised (2021)
- Prevent Duty guidance higher education revised (2021)
- Peterborough and Cambridge Safeguarding Board 'Inter-Agency Procedures'
- Lincolnshire Safeguarding Board

Parents and carers are informed about our responsibilities via the IEG, ESPA and college website and prospectus. A copy of this policy can be obtained on all websites.

Responsibilities

Whilst overall responsibility for safeguarding children, young people and vulnerable adults is vested in the Principal, who is responsible for ensuring compliance to this policy and its procedures ESPA work with the IEG Group who also has named Designated Safeguarding Lead (DSL) and deputies (DDSL). The role, responsibilities and contact details of the DSL's can be found in Appendix 1. There is a member of the IEG Governing Body with specific responsibility for safeguarding issues.

Every member of staff has a responsibility to:

- Know where this policy is located, have read and understood all associated procedures and appendices including those on the local safeguarding boards website
- Read and understand Part 1 and relevant Annex of the DfE 'Keeping Children Safe in Education' 2021 statutory guidance for schools and colleges
- Attend training from the point of induction and undertake annual refreshers, keeping up to date with all mandatory safeguarding and Prevent training
- Know the name of the DSL / DDSL / Safeguarding Team members and their role
- Follow the recording and referral process for any concerns to the Safeguarding Team, recognising responsibility in the Early Help process and referrals to social care to maximise the opportunity for timely intervention
- Ensure students know that there are members of staff whom they can approach if they are worried about a safeguarding issue and that their concerns will be taken seriously and acted upon as appropriate
- Never agree with a student to maintain confidentiality where there is a safeguarding concern
- Have an awareness of behaviours and associated dangers linked to issues such as drug and alcohol misuse, frequently going missing from home / care, family circumstances and domestic abuse, and online / social media activity
- Identify concerns early to prevent them from escalating; being alert to the signs and indicators of abuse and neglect, suspicions or disclosures of harm, extra-familial harm, risk of radicalisation, modern slavery, trafficking or exploitation, grooming, anti-social or criminal behaviour, serious youth violence
- Be aware that students can abuse other students referred to as 'peer on peer abuse' and can manifest itself in many ways. All forms of peer on peer abuse including sexual violence and sexual harassment is unacceptable and will not be tolerated
- Understand that some groups can be more vulnerable to risk such as those with Special Educational Needs and Disabilities (SEND), females, LGBT+, care leavers, children in care and previously in care
- Recognise that mental health problems can, in some cases be an indicator that a student has suffered or is at risk of suffering abuse, neglect or exploitation
- Contribute to the culture of safety which promotes a positive, supportive and secure environment including online, which provides all with a sense of respect and value
- Know the safeguarding response to children who go missing in education
- Raise any concerns about poor, unsafe or safeguarding practices to the DSL. If for any reason they are not able to do so, to raise them to the IEG Principal, Chief Executive Officer (CEO), Deputy Principal, through the Whistleblowing Policy or the NSPCC whistleblowing helpline.

Related Documentation

- Appendix 1 – Safeguarding Contacts
- Appendix 2 – Safeguarding Procedures
- Appendix 3 – Supporting Vulnerable Students
- Appendix 4 – Safeguarding Concerns
- UCP Policies
- Student Behaviour and Disciplinary Policy
- HR policies including Recruitment and Selection, Employee Professional Standards, Disclosure and Barring Service
- STU005 - Bullying and Harassment Policy
- Single Equality Scheme
- IT and Online Safety Policies
- Fitness to Study Policy

- Visitors and Contractors Policies
- Lone Workers Policy
- HR001 - Whistleblowing Policy
- EDI002 - SEND Policy
- Educational Visits and CQ013 External Speakers Policy
- EMP001 - Employer Placement Policy
- Visitors Policy

Appendix 1

Safeguarding for All Policy – Appendix 1 Safeguarding Contacts

KEY CONTACT WITHIN EASTERN SCHOOL OF PERFORMING ARTS (ESPA)
Kelly-Ann Gordon - Principal and Designated Safeguarding Lead (DSL) Tel: 01780 767696 Email: kgordon@easternschool.co.uk

KEY CONTACT WITHIN INSPIRE EDUCATION GROUP (IEG)
Janet Meenaghan – CEO IEG & Principal of Stamford College Tel: 01780 484300 ext. 305 email: linda.westwood@stamford.ac.uk **Rachel Nicholls - Deputy CEO IEG & Principal of Peterborough College** Tel: 01733 762162 email: liz.nixon@peterborough.ac.uk
Designated Safeguarding Lead (DSL) - Stamford Campus Sarah Young - Vice Principal – Student & Staff Experience Tel: 01780 484300 ext. 657, email: sarah.young@stamford.ac.uk
Designated Safeguarding Lead (DSL) - Peterborough Campus Laila Bentley – Executive Director of Student Services Tel:01733 762278, email: laila.bentley@peterborough.ac.uk
Inspire Education Group - Safeguarding Governor Rod Allerton

SAFEGUARDING TEAM - STAMFORD COLLEGE
Deputy Designated Safeguarding Lead (DDSL) - Designated Welfare-CIC Lauren Barker 07810 161010 Lauren.barker@stamford.ac.uk **Student Welfare and Safeguarding Officer** Hayley Cooper 07810 161010 hayley.cooper@stamford.ac.uk Safeguarding Officer (Inclusive Learning) Beverley Peasgood beverley.peasgood@stamford.ac.uk

Local Safeguarding Boards

Lincolnshire Safeguarding Children Board
To report a concern, call the Children Services Customer Service Centre (CSC) on 01522 782111.
Outside of office hours contact the Emergency Duty Team (EDT) on 01522 782333

Cambridgeshire and Peterborough Safeguarding Partnership Board
To report a concern, contact MASH on:
Cambridgeshire
Children's Services: 0345 045 5203
Adult Services: 0345 045 5202
Emergency Duty Team (Out of Hours) 01733 234724
Early Help: 01480 376 666 early.helphub@cambridgeshire.gov.uk
PETERBOROUGH
Children's Services: 01733 864180
Adult Services: 01733 747474
Emergency Duty Team (Out of Hours) 01733 234724.
Early Help: 01733 863649, earlyhelp@peterborough.gov.uk

Local Authority Designated Officer (LADO)

Lincolnshire
LADO
Tel: 01522 554 674

Cambridgeshire
LADO LADO@cambridgeshire.gov.uk Tel: 01223 727967 Named Senior Officer for allegations:
Senior Education Adviser – Diane Stygal Tel: 01223 507115

Peterborough
LADO LADO@peterborough.ac.uk
Gisela Jarman Tel: 01733 864038
Jane Bellamy Tel: 01733 864790

Channel Contact Details

Lincolnshire
prevent@lincs.pnn.police.uk

Cambridgeshire
prevent@cambs.pnn.police.uk

Safeguarding for All Policy - Appendix 2
Procedures

The Inspire Education Group (IEG) and Eastern School of Performing Arts (ESPA) has developed procedures in line with and taking account of, guidance issued by the Department for Education (DfE), the Association of Colleges (AoC) and other relevant bodies. These procedures are consistent with the requirements of the Local Safeguarding Children and Adults Boards.

Compliance with statutory recommendations is reflected in the following commitments:

- Providing a training programme of mandatory key areas including Safeguarding, Prevent, Female Genital Mutilation (FGM), Keeping Children Safe in Education (KCSiE) via annual, refresher and inductions alongside additional staff development opportunities to update on legal and national themes
- Appointing a nominated Governor whose role is to ensure that the Group has an effective policy, locally agreed procedures are in place and that the policy and structures supporting safeguarding are reviewed annually
- Implementing a robust Prevent risk assessment and safeguarding action plan which are reviewed annually and monitored through the IEG Safeguarding and Prevent committee
- Ensuring a senior member of staff from the leadership team has the role of the Designated Safeguarding Lead (DSL), taking the lead responsibility for safeguarding. The responsibility is explicit in the DSL and any deputy job description with time, training, funding, resources and support to undertake their duties
- Ensuring that the DSL and all deputies (DDSLs) undertake the two-day training provided by the Education Safeguarding Team and that this is updated every two years. In addition, that knowledge and skills are refreshed at regular intervals throughout the year
- Operating safe recruitment practices for its employees and visitors including ensuring appropriate Disclosure and Barring Service (DBS), self-declaration, identity, right to work, health and reference checks are undertaken according to Part 3 of KCSiE
- Ensuring any recruits who do not have a valid DBS are not unsupervised until this has been received. Undertaking a risk assessment, approved by the Principal before the member of staff can commence employment
- Ensuring the upkeep of a Single Central Record (SCR) of all staff, supply staff1, volunteers, Governors and frequent visitors (visiting associates) following government guidance and the DBS
- Ensuring existing staff complete and sign an annual self-declaration, including spent and unspent convictions advising if any information has been held locally by police forces considered relevant
- Keeping the Principal informed of any issues and ongoing investigations and staff allegations. In the cases of staff allegations that meet the threshold, liaising with the local authority designated officer (LADO) and or adult services if required. Where the Principal is the subject of the allegation the report will be made to the Chair of Governors
- Ensuring investigation and disciplinary proceedings against staff, supply staff1, volunteers, Governors and frequent visitors relating to safeguarding allegations are managed fairly, quickly and consistently, keeping the individual informed of the progress and concluded in full, even when no longer employed. Notification of any concerns and outcomes are made to the relevant authorities, DBS and professional bodies and included in references where applicable
- Informing the Education and Skills Funding Agency (ESFA) directly if the Group itself, or one of its subcontractors, is the subject of an investigation by the Local Authority or the police in connection with a Prevent issue or safeguarding related concern
- Including opportunities in study and personal development programmes for students which encourages confidence, self-esteem and motivation to develop the skills they need to recognise abuse including from their peers and online and stay safe
- Promoting educational outcomes by sharing information about the welfare, safeguarding issues that students (including students with a social worker) are experiencing/have experienced with appropriate college staff

- Liaising with the three safeguarding partners (Local Authority, Clinical Commissioning Group and Police) as appropriate and work with other agencies in line with Working Together to Safeguard Children, 2018
- Ensuring training and processes are in place for case referral to the Channel programme where there is a radicalisation concern. Where appropriate having representation at the Channel panel to help with this assessment
- Deciding upon the appropriate level of response to specific concerns e.g. discuss with parents, offer an Early Help Assessment or referral to social care or support agencies
- Providing alternative support and education arrangements to address COVID implications for vulnerable and at-risk students to maintain access to the learning experience
- Ensuring that external events and visiting speakers' risk assessments are completed for all events in a timely fashion so that they can be approved before the event taking place
- Implementing, coordinating and maintaining the vetting of all employer premises for all apprentices, industry and work placements in line with policy and procedures to ensure that a safe and secure environment is established in all aspects of the work placement

During term time and college hours, a deputy or Safeguarding Team member will always be available. During the non-term time there is a safeguarding and Duty Manager/Principal rota in place and those in immediate danger will be signposted to emergency services or social care. If in exceptional circumstances the DSL, DDSL or Safeguarding Team members are not available, a member of the Senior Leadership Team or Deputy Principal should be contacted. See Appendix 1 for key contacts and details.

Record Keeping and Information Sharing

Information about students and their families is defined as special category data, and all collection, storage and sharing of personal information will be carried out in line with the General Data Protection Regulations 2018 (GDPR).
All records will be kept electronically under restricted permissions using the Group management information system separate from any academic records. Any hard copy files from previous education provisions will be stored securely. Where appropriate information will be shared with a new provision in advance of the student leaving.

Records will include:
- A clear and comprehensive summary of the concern
- Details of how the concern was followed up and resolved
- Details of any action taken, decisions reached and the outcome
- When decisions are made to share or withhold information, who the information has been shared with and why
- Discussions that have taken place with parents or if a decision has been made not to discuss it with parents, the rationale must be recorded

All actions and decisions are led by what is considered to be in the best interests of the student. Parents are made aware that such records exist except where to do so would place the student at risk of harm.

The Safeguarding Team has a professional responsibility to share information with other agencies to safeguard children, (as set out in 'Information sharing; Advice for practitioners providing safeguarding services to children, young people, parents and carers,' DfE, July 2018).

Information sharing:

●Any Subject Access Request under GDPR, from a student or parent, must be referred to the DSL
●All information shared is based on a 'need to know' basis
●Consent to share information will always be gained unless doing so would place the student at risk of harm or prejudice prevention or detection of crime. Where this is the case when a discussion with social care will take place. Information may only be shared without consent where there is a good reason to do so, and that the sharing of information enhances the safeguarding of a student in a timely manner
●Records may subsequently be disclosable to relevant partner agencies if Child Protection proceedings commence
●Staff should never view or forward any suspected consensual or non-consensual nude or semi-nude images/videos. It may be appropriate to confiscate any devices to preserve any evidence and hand them to the police for inspection

Peer on Peer Abuse, Sexual Violence and Sexual Harassment

All staff should be aware that children can abuse other children (often referred to as peer on peer abuse), and that it can happen both inside and outside of college and online. It is important that all staff recognise the indicators and signs of peer on peer abuse and know how to identify it and respond to reports. See Appendix 4, p9 of Safeguarding Concerns for definitions of peer on peer abuse.

Sexual violence and sexual harassment can occur between two children of any age and sex. It can occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Sexual violence and sexual harassment exist on a continuum and may overlap; they can occur online and face to face (both physically and verbally) and are never acceptable. See Appendix 4, p9 and 10 Safeguarding Concerns for the definitions of sexual violence and sexual harassment. Staff should be aware it is more likely that females will be the victims of sexual violence and sexual harassment and more likely it will be perpetrated by males. Safeguarding incidents and/or behaviours can be associated with factors outside the college, including intimate personal relationships.

All victims must be reassured that they will be taken seriously regardless of how long it has taken for them to come forward and that they will be supported and kept safe. Abuse that has occurred online or outside of the college must be treated equally seriously. All concerns whether reported by a student's friend or third party must be reported immediately to the Safeguarding Team. The process outlined in Diagram 2, Dealing with reports of sexual violence/harassment/Harmful Sexual Behaviours will then be followed.

Supporting and protecting both the victim and alleged perpetrator is paramount. Risk assessment and consideration of existing provision and college environment must be established to maintain where appropriate, arrangements to provide a suitable and safe education for all parties. Proportionality of the response will be considered on a case by case basis, considering the needs of those involved. Multi agency working with relevant and services will be invoked where required along side liaison and signposting with appropriate specialist support agencies.

Sharing nudes and semi nudes

In the latest advice for schools and colleges (UKCIS, 2020), this is defined as the sending or posting of nude or semi-nude images, videos or live streams online by young people under the age of 18. This could be via social media, gaming platforms, chat apps or forums. It could also involve sharing between devices via services like Apple's AirDrop which works offline. Alternative terms used by children and young people may include 'dick pics' or 'pics'. The motivations for taking and

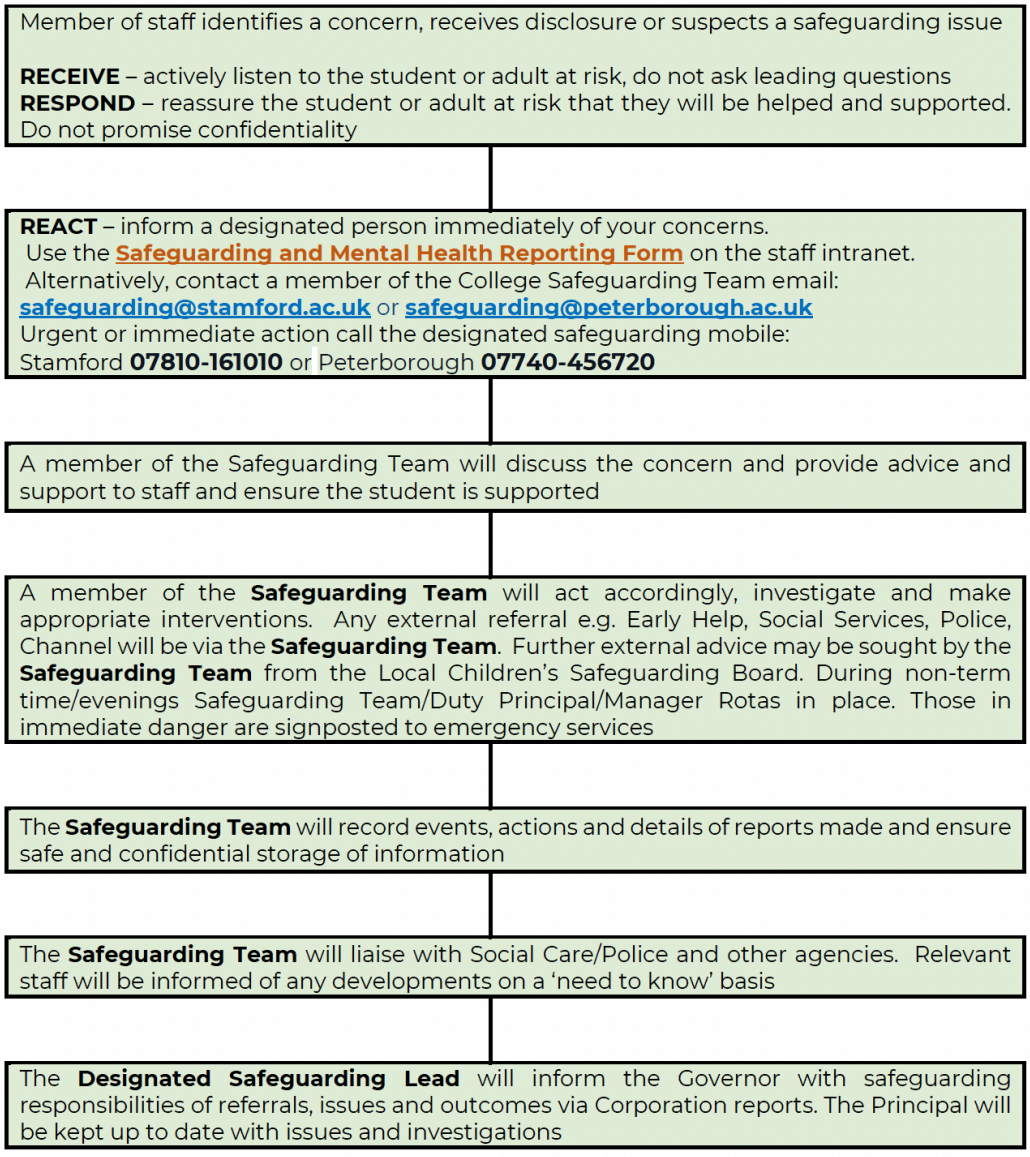
Appendix 2

sharing nude and semi-nude images, videos and live streams are not always sexually or criminally motivated.
This advice does not apply to adults sharing nudes or semi-nudes of under 18-year olds. This is a form of child sexual abuse and must be reported to the Safeguarding Team who will refer to the police as a matter of urgency.

Responding to an incident:

•Report immediately to the Safeguarding Team. The process outlined in Diagram 3 will then be followed
•Staff must never view, copy, print, share, store or save the imagery, or ask a child to share or download – this is illegal
•If the staff member has already viewed the imagery by accident (e.g. if a young person has showed it before asking them not to) report this to the Safeguarding Team
•Do not delete the imagery or ask the young person to delete it
•Do not ask the child/children or young person(s) who are involved in the incident to disclose information regarding the imagery. This is the responsibility of the Safeguarding Team
•Do not share information about the incident with other members of staff, the young person(s) it involves or their, or other, parents and/or carers.
•Do not say or do anything to blame or shame any young people involved.
•Do explain to them that it must be reported and reassure them that they will receive support

Diagram 1. Dealing with Safeguarding Concerns



Appendix 2

Diagram 2. Dealing with Reports of Sexual Violence/Harassment/Harmful Sexual Behaviours

Source: Adapted from Andrew Hall : Safeguarding Handbook 2021

Report Received
(from the victim or third-party)
(Onsite, offsite or online)
Refer to KCSIE Part 5 and Sexual Violence and Sexual Harassment between children in schools and colleges (DfE, 2021)

Definitions

Sexual Violence
Rape
Assault by penetration
Sexual assault

Sexual Harassment
Unwanted conduct of a sexual nature, including sexual remarks, sexual taunts, physical behaviour or online sexual harassment

Victim reassured
· taken seriously and kept safe; and never be given an impression they are creating a problem
· confidentiality not promised
· listen to victim, non-judgementally
· record the disclosure (facts as reported)
· two staff present (one being the DSL, or reported to DSL as soon as possible)
· victim sensitively informed about referral to other agencies
· if victim does not give consent to share, staff may still lawfully share in order to protect child from harm and to promote the welfare of children (see 'Sexual Violence and Sexual Harassment' paragraph 62)
· parents of victim informed, unless this would put victim at greater risk.

Anonymity
Note that in cases of sexual violence there is legal protection of the victim's identity. Remember that this also includes sharing on social media and discussion amongst students in the college.

Record Keeping
Remember, to record all concerns, discussions, decisions and reasons for decisions.

Considerations
(Sexual Violence, Sexual Harassment and Harmful Sexual Behaviours)
Immediately: Consider how to support the victim and the alleged perpetrator

- wishes of the victim
- nature of the alleged incident
- ages of the children
- development stage of the child
- any power imbalance
- one-off, or part of a pattern of behaviour
- any ongoing risks to victim or others
- other related issues and wider context (e.g. CSE)

MANAGE INTERNALLY
One-off incidents which the college believes that the child(ren) are not in need of early help or statutory intervention, which would be appropriate to deal with internally under the school's behaviour policy or anti-bullying policy.

EARLY HELP
Non-violent Harmful Sexual Behaviours (see Harmful Sexual Behaviours Framework (NSPCC)

REFER TO SOCIAL CARE
All incidents where a child has been harmed, is at risk of harm or is in immediate danger.

Social Care staff will decide next steps. Be ready to escalate if necessary.

REFER TO POLICE
All incidents of rape, assault by penetration or sexual assault.

Discuss next steps with police, for example, disclosing information to other staff, informing alleged perpetrator and their parents.

Risk Assessment
Case-by-case basis
(for details see paragraphs 69 and 70)
Sexual Violence and Sexual Harassment between children in schools and colleges (DfE, 2021))

Risk Assessment
Immediately
Do not wait for outcome of referral before protecting victim.
Emphasis on victim being able to continue normal routines.
Alleged perpetrator removed from any classes with victim (also consider shared spaces and journey to/from college)
{Not a judgment of guilt}

SAFEGUARD AND SUPPORT VICTIM AND (ALLEGED) PERPETRATOR
Arrangements required to maintain education provision, ongoing multi agency and specialist support

SAFEGUARD AND SUPPORT VICTIM AND (ALLEGED) PERPETRATOR

DISCIPLINARY MEASURES TAKEN
(see IEGs Behaviour Policy/Bullying and Harassment Policy)

DISCIPLINARY MEASURES TAKEN
(may be undertaken based on balance of probabilities, unless prejudicial or unreasonable)

Ensure actions do not jeopardise the investigation
College to work closely with police and/or other agencies

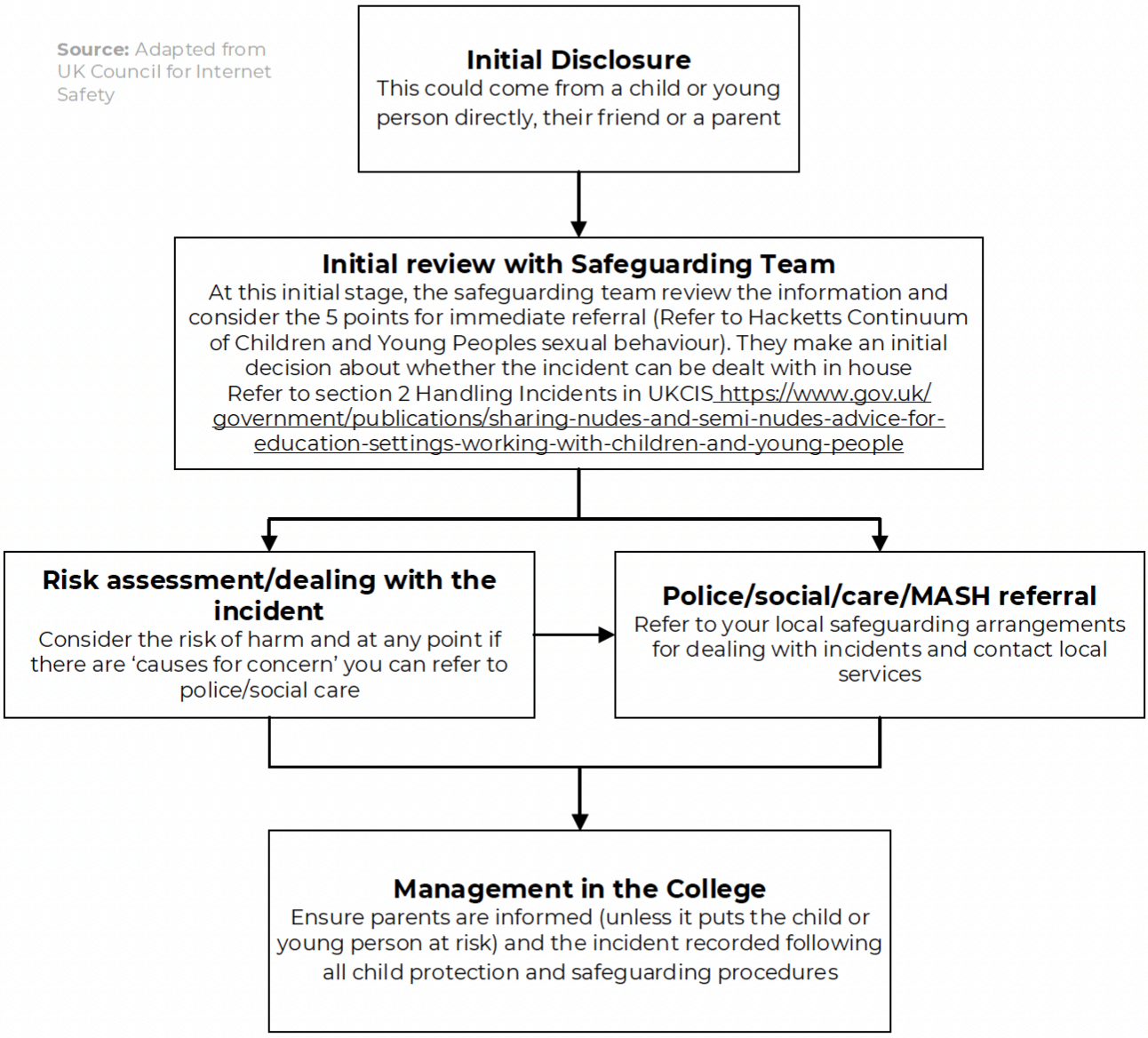
CRIMINAL PROCESS ENDS

- **Conviction or Caution:** follow behaviour policy, consider Permanent Exclusion. If pupil remains in college, make clear expectations; keep victim and perpetrator apart. Consider victim's wishes.
- **Not Guilty:** Support victim and perpetrator
- **No Further Action:** Support victim and alleged perpetrator

Appendix 2

Diagram 3. Dealing with Incidents relating to the Sharing of Nudes and Semi Nudes

Source: Adapted from UK Council for Internet Safety



Safeguarding for All Policy – Appendix 3
Supporting Vulnerable Students

Vulnerable Children and Adults Definitions
Within the context of this policy, a child is defined as anyone under the age of 18. Vulnerable children include those:

●With a social worker including children who have a Child Protection Plan and those who are looked after by the Local Authority
●Assessed as being in need, or otherwise meet the definition in section 17 of the Children's Act 1989
●With additional needs, special educational needs and or disabilities (SEND), emotional and behavioural difficulties and mental health difficulties and may have an Education Health and Care Plan (EHCP)
●Assessed as otherwise vulnerable by educational providers or local authorities (including children's social care services), and who could therefore benefit from continued attendance. This might include those who are:

- On the edge of receiving support from children's social care services
- Privately fostered (under the age of 16 (under 18 if has a disability) and adopted children
- At risk of becoming 'not in employment, education or training' NEET
- Living in temporary accommodation
- Young carers
- Have family members are in prison
- Showing signs of abuse and neglect
- Living with: domestic abuse, substance misuse, poverty, homelessness, adult mental health
- Showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime Groups
- Misusing drugs or alcohol
- At risk of modern slavery, trafficking or exploitation
- At risk of radicalisation or exploitation
- Frequently going missing from care or from home
- Unaccompanied Asylum Seeking Children (UASC)

Vulnerable adults (defined by Section 59, Safeguarding Vulnerable Groups Act 2006) are at the age of 18 or over to whom one of the following applies:

- Has a reduced capacity to give consent to a disclosure of abuse allegations or suspicion
- Has additional needs, SEND, emotional and behavioural difficulties and mental health difficulties and may have EHCP up to the age of 25
- Detained in custody or under the supervision of the probation services
- Leaving care services, seeking asylum or refuge
- In need of community care services because of mental or other disability, age or illness and who is or may be unable to take care of him/herself, or unable to protect him/herself against significant harm or exploitation. This may include:

o Receiving personal care, or nursing, or support to live independently in their own home or a care home
o Receiving any health or social services support

Students (children and adults) with SEND can face specific challenges including:
- Being more prone to peer group isolation or bullying (including prejudice-based bullying)
- Difficulties with communication making disclosures and investigations difficult
- Assumptions that behaviour, mood or injury interpreted as relating to their SEND rather than any abuse

Identifying Vulnerable Children and Adults

Across the Group students at risk are identified through a variety of ways:

- Application and enrolment screening
- School liaison and references
- EHCP consultations and review process
- Induction process
- Student finance application screening
- Additional Learning Support screening
- Disciplinary referrals
- Academic and support staff reporting and monitoring
- Welfare and mentoring staff reporting and monitoring
- Attendance/absence monitoring
- Regular 'At Risk meetings'
- Self-referral

Supporting Vulnerable Children and Adults

Support arrangements for vulnerable students is underpinned by:

● Strong links with external partners as well as local and national agencies to ensure a multi-disciplinary approach to support students
● Consistent implementation of student codes of conduct and behavioural policies ensures that students know what behaviour is unacceptable
● Continuing support and activities of additional learning, student engagement, welfare, mental health and wellbeing and external signposting whether onsite or remote in the case of alternative arrangements due to COVID
● Development of a responsive and knowledgeable staff trained to respond appropriately in safeguarding situations
● Effective absence reporting and attendance monitoring
● Encouraging students to feedback on how 'safe' they feel via student voice opportunities and the personal development programme
● Embedding throughout the student journey opportunities to raise awareness and educate about safe and responsible practices
● Regular 'At Risk meetings' held where key members of the Student Services team collaboratively coordinate action and support for priority cases
● Collecting two emergency contact details at the point of enrolment
● A comprehensive Fitness to Study Policy which gives a framework to support students and a Bullying and Harassment Policy to respond to allegations
● Commitment to provide alternative working and support arrangements in response to COVID including telephone welfare checks, virtual hosted Electronic Personal Education Plan (EPEP) and EHCP reviews, remote support for e-learning/google classrooms, risk assessments and care plans

Working in Partnership

The Groups Safeguarding Team will assist the Local Authority, Police and Clinical Commissioning Groups to exercise their statutory functions contributing to multi-agency working including:

● Attending case conferences, Core Group meetings/Children in Need meetings in liaison with key agencies
● Gathering information from all relevant sources to contribute to an assessment and coordinating the implementation for any aspects of the Child Protection Plan/Child in Need Plan
● Notifying Children's Services when there is an unexplained absence or exclusion for a child who is the subject of a Child Protection Plan, a child/student/vulnerable adult is missing from education

● Following the mandatory duty to inform the local authority of any 'Private Fostering' arrangements
● Vigilantly monitoring the welfare of children living in domestic abuse households, offering support and contributing to any Multi-Agency Risk Assessment Conference (MARAC) safety plan as required
● Working in partnership with Cambridgeshire Police and Cambridgeshire County Council/ Peterborough City Council to identify and provide appropriate support to pupils who have experienced domestic abuse in their home; this scheme is called Operation Encompass
● Working with the Local Authority Virtual College Head (VSH) for looked-after and previously looked-after children
● Completing the Safeguarding Children Partnership Board's Exploitation Risk Assessment and Management Tool and referring to Social Care if there is a concern that a student may be at risk of Child Sexual Exploitation
● Proactive engagement and representation with safeguarding boards, committees for groups such as Hate Crime, Missing and Criminal and Sexual Exploitation and those related to mental health
● Working with Channel, a voluntary, confidential support programme that focuses on providing support at an early stage to those who are vulnerable to being drawn into terrorism

Early Help

Early Help means providing support as soon as a problem emerges. The Early Help Assessment (EHA) is a single assessment that is created with the family. It should reflect their views, wishes and feelings and what they want to change. It is shared when appropriate (and where there is consent) with other professionals who are working in a coordinated way to support the family. EHA's are completed by any professional or partner agency that comes into direct contact with families, and who has identified more than one unmet need that would benefit from a multi-agency support approach. In the first instance, staff should discuss early help requirements with a member of the Safeguarding Team. Staff may be required to share information to support other agencies and professionals in an Early Help Assessment.

Online Safety

The use of technology has become a significant component of many safeguarding issues. Child sexual exploitation; radicalisation; sexual predation: technology often provides the platform that facilitates harm.
The breadth of issues classified within online safety is considerable, but can be categorised into three areas of risk:

● Content: being exposed to illegal, inappropriate or harmful material; for example, pornography, fake news, racist or radical and extremist views
● Contact: being subjected to harmful online interaction with other users; for example, commercial advertising as well as adults posing as children or young adults
● Conduct: personal online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images, or online bullying
● Commerce: risks such as online gambling, inappropriate advertising, phishing and or financial scams. For those at-risk reports can be made to The Anti-Phishing Working Group at https://www.apwg.org/

Guidance is available to staff around safe teaching and learning when working remotely. ESPA and IEG has online safety and acceptable use policies for staff and students which should be considered in line with this policy. Filters and monitoring are in place to limit access to inappropriate sites.

Safeguarding for All Policy – Appendix 4
Safeguarding Concerns

Children in Need

Children and young people who are defined as being "in need" under Section 17 of the Children Act 1989 are those whose vulnerability is such that they are unlikely to reach or maintain a satisfactory level of health or development, or their health and development will be significantly impaired, without the provision of service(s). A child with a disability is a Child in Need.

Children suffering or likely to suffer significant harm

Local authorities, with the help of other organisations as appropriate, have a duty to make enquiries under section 47 of the Children Act 1989 if they have reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm. Such enquiries enable them to decide whether they should take any action to safeguard and promote the child's welfare and must be initiated where there are concerns about maltreatment. This includes all forms of abuse and neglect, female genital mutilation, or other so-called 'honour'-based abuse, forced marriage and extra-familial harms like radicalisation and sexual exploitation.

Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)

Different forms of harm often overlap, and perpetrators may subject children and young people to multiple forms of abuse, such as criminal exploitation (including county lines) and sexual exploitation.
In some cases, the exploitation or abuse will be in exchange for something the victim needs or wants (for example, money, gifts or affection), and/or will be to the financial benefit or other advantage, such as increased status, of the perpetrator or facilitator.
Children can be exploited by adult males or females, as individuals or in groups. They may also be exploited by other children, who themselves may be experiencing exploitation – where this is the case, it is important that the child perpetrator is also recognised as a victim.
Whilst the age of the child may be a contributing factor for an imbalance of power, there are a range of other factors that could make a child more vulnerable to exploitation, including, sexual identity, cognitive ability, learning difficulties, communication ability, physical strength, status, and access to economic or other resources.

Some of the following can be indicators of both child criminal and sexual exploitation where children:

- Appear with unexplained gifts or new possessions
- Associate with other young people involved in exploitation
- Suffer from changes in emotional well-being
- Misuse drugs and alcohol
- Go missing for periods or regularly come home late
- Regularly miss school or education or do not take part in education

Some additional specific indicators that may be present in CSE are children who:
- Have older boyfriends or girlfriends
- Suffer from sexually transmitted infections
- Display sexual behaviours beyond expected sexual development or become pregnant

County Lines

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs using dedicated mobile phone lines or other form of "deal line". This activity can happen locally as well as across the UK - no specified distance of travel is required. Children and vulnerable adults are exploited to move, store and sell drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims.
Children can be targeted and recruited into county lines in a number of locations including schools (mainstream and special), further and higher educational institutions, pupil referral units, children's homes and care homes.

Children are also increasingly being targeted and recruited online using social media. Children can easily become trapped by this type of exploitation as county lines gangs can manufacture drug debts which need to be worked off or threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.
A number of the indicators for CSE and CCE as detailed above may be applicable to where children are involved in county lines. Some additional specific indicators that may be present where a child is criminally exploited through involvement in county lines are children who:

- Go missing and are subsequently found in areas away from their home
- Have been the victim or perpetrator of serious violence (e.g. knife crime)
- Are involved in receiving requests for drugs via a phone line, moving drugs, handing over and collecting money for drugs
- Are exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection
- Are found in accommodation that they have no connection with, often called a 'trap house or cuckooing' or hotel room where there is drug activity
- Owe a 'debt bond' to their exploiters
- Have their bank accounts used to facilitate drug dealing

Extremism

Extremism is defined by the Crown Prosecution System (CPS) as: "The demonstration of unacceptable behaviour by using any mean or medium to express views, which:
- Encourage, justify or glorify terrorist violence in furtherance of particular beliefs
- Seek to provoke others to terrorist acts
- Encourage other serious criminal activity or seek to provoke others to serious criminal acts
- Foster hatred which might lead to inter-community violence in the UK

Female Genital Mutilation (FGM)

FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences.
Section 5B of the Female Genital Mutilation Act 2003 (as inserted by Section 74 of the Serious Crime Act 2015) places a statutory duty upon teachers along with regulated health and social care professionals in England and Wales, to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Those failing to report such cases may face disciplinary sanctions. It will be rare for teachers to see visual evidence, and they should not be examining students, but the same definition of what is meant by "to discover that an act of FGM appears to have been carried out" is used for all professionals to whom this mandatory reporting duty applies.

Forced Marriage

Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning difficulties, for example). In addition, some communities use religion and culture as a way to coerce a person into marriage.

Honour-Based Abuse

So-called honour-based abuse (HBA) encompasses crimes that have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation (FGM), forced marriage and practices such as breast ironing. All forms of HBA are abuse (regardless of motivation) and should be handled as such. If in any doubt, staff should speak to the students.

Radicalisation

Students can be vulnerable to extremist ideology and radicalisation.
- Extremism is the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces
- Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups

• Terrorism is an action that endangers or causes serious violence to a person/people; causes serious property damage, or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made to advance a political, religious or ideological cause

Significant Harm

The concept of significant harm is the threshold that justifies compulsory intervention into family life in the best interests of the child or student and gives local authorities a duty to make enquiries as to whether to take action (Section 47, Children Act 1989) to safeguard or promote the welfare of a student who is suffering, or likely to suffer significant harm. The Act also gives powers to the Police to take emergency action to protect a student from significant harm.

Serious Violence

Indicators, which may signal that a student is at risk from, or are involved with serious violent crime. These may include:
• increased absence
• a change in friendships or relationships with older individuals or groups
• a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries
• Unexplained gifts or new possessions could also indicate being approached by, or involved with, individuals associated with criminal networks or gangs

Domestic Abuse

The Domestic Abuse Act 2021 received Royal Assent on 29 April 2021. The Act introduces the first-ever statutory definition of domestic abuse and recognises the impact of domestic abuse on children, as victims in their own right, if they see, hear or experience the effects of abuse. The statutory definition of domestic abuse, based on the previous cross-government definition, ensures that different types of relationships are captured, including ex-partners and family members. The definition captures a range of different abusive behaviours, including physical, emotional and economic abuse and coercive and controlling behaviour. Both the person who is carrying out the behaviour and the person to whom the behaviour is directed towards must be aged 16 or over and they must be "personally connected" (as defined in section 2 of the 2021 Act).

Types of domestic abuse include:
• Intimate partner violence, abuse by family members, teenage relationship abuse and child/adolescent to parent violence and abuse
• Anyone can be a victim of domestic abuse, regardless of sexual identity, age, ethnicity, socio-economic status, sexuality or background and domestic abuse can take place inside or outside of the home

All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Experiencing domestic abuse and/or violence can have a serious, long-lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Young people can also experience domestic abuse within their own intimate relationships. This form of peer on peer abuse is sometimes referred to as 'teenage relationship abuse'. Depending on the age of the young people, this may not be recognised in law under the statutory definition of 'domestic abuse' (if one or both parties are under 16). However, as with any child under 18, where there are concerns about safety or welfare, child safeguarding procedures should be followed and both young victims and young perpetrators should be offered support

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 vulnerable person.

Possible Signs
- Bruises and scratches to face and head
- Pinch bruises or bite bruises
- Bruising around both eyes simultaneously
- Torn frenulum (skin linking upper jaw and lip)
- Fingertip bruising on front and back of chest (gripping)
- Finger or hand marks on any part of the body
- Ligature marks on either neck, arms or legs
- Cigarette burns
- Linear or shaped burns or bruises (e.g. iron/radiator)
- 'Non-cascade' scalds
- Head injury, there may be no outward sign of injury
- Poisoning
- Bald patches
- Recurrent unexplained/untreated injuries or lingering illness

Possible Behaviour
- Explanation inconsistent with injury
- Refusal to discuss injuries
- Fear of going home or parents being contacted
- Arms and legs kept covered in hot weather or fear undressing
- Frozen watchfulness/cowering/flinching at sudden movements
- Withdrawal from physical contact
- Fear of medical help
- Admission of excessive punishment
- Running away
- Self-destructive tendencies

Emotional Abuse

Is persistent emotional maltreatment such as to cause severe and persistent adverse effects on the individuals' emotional development? It may involve conveying that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate.

It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond the child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child from participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying) causing frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, though it may occur alone.

Possible Signs
- Speech delay, poor verbal ability, lack of communication skills
- Bedwetting, soiling (without physical cause)
- Lack of concentration, learning problems
- Unreasonable fear of new situations
- Eating disorders (over-eating and under-eating)
- Inappropriate emotional responses to stressful situations
- Low self-esteem
- Self-mutilation
- Alcohol, drugs, solvent misuse

Possible Behaviour
- Over-reaction to mistakes
- Obsessive behaviour (e.g. rocking, twisting hair, sucking thumb)
- Withdrawal from relationships with other children
- Fear of parents being contacted
- Extremes of passivity or aggression
- Attention seeking
- Chronic running away
- Compulsive stealing, scavenging for food or clothes
- Impaired capacity to enjoy life

Neglect

Is the persistent failure to meet an individual's basic physical and/or psychological needs, likely to result in a serious impairment of health or development? Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to:

- Provide adequate food, clothing and shelter (including exclusion from home or abandonment)
- Protect a child from physical harm and external harm or danger
- Ensure adequate supervision (including the use of inadequate caregivers)
- Ensure access to appropriate medical care or treatment
- It may also include neglect of, or unresponsiveness to, a child's basic emotional needs

Possible Signs

- Unkempt appearance, poor personal hygiene
- Poor skin/hair condition
- Drop through height/weight centiles
- Small stature (not a family characteristic)
- Constant tiredness
- Repeated accidents
- Untreated medical conditions
- Inappropriate clothing
- Constant hunger
- Frequent lateness, or non-attendance at school
- Accidental self-poisoning

Possible Behaviour

- Chronic running away
- Compulsive stealing
- Scavenging of food and clothes
- Low self-esteem
- Neurotic behaviour (e.g. rocking, thumb sucking, hair twisting)
- Inability to make social relationships
- Tendency to destroy things

Sexual Abuse

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

Possible Signs

- Wetting and soiling themselves
- Sudden drop in College performance/poor concentration
- Obsessed with sexual matters as opposed to normal exploration
- Changes from being happy and active to being fearful and withdrawn
- Unexplained sources of money/gifts
- Urinary infections, bleeding or soreness in the genital/anal areas
- Vaginal discharge – vaginal warts
- Soreness and bleeding to the throat
- Chronic ailments e.g. stomach pains, headaches without an obvious cause
- Eating disorders
- Becomes severely depressed
- Has a poor self-image
- Uses drugs/alcohol to excess
- Not allowed to have friends around or to go out on dates
- Fearful of undressing for physical education
- Venereal infection
- Pregnancy

Possible Behaviour

- Overly compliant behaviour
- Behaves in a sexually inappropriate way in relation to their age
- Withdrawn and unhappy, insecure and "clingy"
- Plays out sexual acts in too knowledgeable a way for their age
- Regresses to behavioural patterns of much younger children
- Say of themselves that they are bad or wicked
- Arriving early at school/College and leaving late with few, if any, absences
- Excessive masturbation – exposing themselves
- Drawings of sexually explicit nature
- Attempts to sexually abuse another child
- Recurring nightmares and/or fear of the dark
- Had a "friend who has a problem" and then tells about the abuse of "a friend"
- Self-mutilates/attempted suicide
- Running away
- Prostitution

Peer on Peer Abuse

The different forms peer on peer abuse can take, such as:

- Bullying (including cyberbullying, prejudice-based and discriminatory bullying)
- Abuse in intimate partner relationships
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm
- Sexual violence and sexual harassment
- Consensual and non-consensual sharing of nudes and semi-nude images and/or videos
- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- Upskirting
- 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

Upskirting

The Voyeurism (Offences) Act, which is commonly known as the Upskirting Act, came into force on 12 April 2019. 'Upskirting' is where someone takes a picture under a person's clothing (not necessarily a skirt) without their permission and or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is a criminal offence. Anyone of any gender can be a victim.

Dealing with Sexual Violence and Sexual Harassment between children

Sexual violence and sexual harassment can occur between two children of any age and sex from primary to secondary stage and into colleges. It can also occur online. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.

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. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and face to face (both physically and verbally) and are never acceptable.

Children's sexual behaviour exists on a wide continuum, from normal and developmentally expected to inappropriate, problematic, abusive and violent.
Problematic, abusive and violent sexual behaviour is developmentally inappropriate and may cause developmental damage. A useful umbrella term is **"harmful sexual behaviour" (HSB).** The term has been widely adopted in child protection and is used in this advice. HSB can occur online and/or face to face and can also occur simultaneously between the two. HSB should be considered in a child protection context. When considering HSB, ages and the stages of development of the children are critical factors.

Sexual behaviour between children can be considered harmful if one of the children is much older, particularly if there is more than two years' difference or if one of the children is pre-pubescent and the other is not. However, a younger child can abuse an older child, particularly if they have power over them, for example, if the older child is disabled or smaller in stature. Confidential, specialist support and advice on HSB is available from the specialist sexual violence sector

When referring to sexual violence we are referring to sexual offences under the Sexual Offences Act 200314 as described below:

Rape: A person (A) commits an offence of rape if: he intentionally penetrates the vagina, anus or mouth of another person (B) with his penis, B does not consent to the penetration and A does not reasonably believe that B consents.
Assault by Penetration: A person (A) commits an offence if: s/he intentionally penetrates the vagina or anus of another person (B) with a part of her/his body or anything else, the penetration is sexual, B does not consent to the penetration and A does not reasonably believe that B consents.
Sexual Assault: A person (A) commits an offence of sexual assault if: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents. (Schools should be aware that sexual assault covers a very wide range of behaviour so a single act of kissing someone without consent or touching someone's bottom/breasts/genitalia without consent, can still constitute sexual assault.)
Causing someone to engage in sexual activity without consent: A person (A) commits an offence if: s/he intentionally causes another person (B) to engage in an activity, the activity is sexual, B does not consent to engaging in the activity, and A does not reasonably believe that B consents. (This could include forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.)

What is consent? Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another, e.g.to vaginal but not anal sex or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity and each time activity occurs. Someone consents to vaginal, anal or oral penetration only if s/he agrees by choice to that penetration and has the freedom and capacity to make that choice.

Whilst not intended to be an exhaustive list, **sexual harassment** can include:
• Sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names
• Sexual "jokes" or taunting
•Physical behaviour, such as: deliberately brushing against someone, interfering with someone's clothes (schools and colleges should be considering when any of this crosses a line into sexual violence - it is important to talk to and consider the experience of the victim) and displaying pictures, photos or drawings of a sexual nature; and **Online sexual harassment.** This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence. It may include:
• Consensual and non-consensual sharing of nude and semi-nude images and/or videos19. As set out in UKCIS Sharing nudes and semi-nudes: advice for education settings working with children and young people (which provides detailed advice for schools and colleges) taking and sharing nude photographs of U18s is a criminal offence
• Sharing of unwanted explicit content
• Upskirting (is a criminal offence20)
• Sexualised online bullying
• Unwanted sexual comments and messages, including, on social media
• Sexual exploitation; coercion and threats

Young Carers

ESPA recognises that children who are living in a home environment which requires them to act as a young carer for a family member or a friend, who is ill, disabled or misuses drugs or alcohol can increase their vulnerability and that they may need additional support and protection.

Children Misusing Drugs or Alcohol

The discovery that a student is misusing legal or illegal substances or reported evidence of their substance misuse is not necessarily sufficient in itself to initiate child protection proceedings but the school will consider such action in the following situations:

Privately Fostered Children

Private fostering is when a child under the age of 16, (under 18 if disabled) is provided with care and accommodation by a person who is not a parent, person with parental responsibility for them or relative in their own home for 28 days or more.

Children who have returned home to their family from care

ESPA recognises that a previously looked after child potentially remains vulnerable. The Group will vigilantly monitor the welfare of previously looked after children, keep records and notify Social Care as soon as there is a recurrence of a concern.

Children who have Family Members in Prison

Approximately 200,000 children in England and Wales have a parent sent to prison each year. These children are at risk of poor outcomes including poverty, stigma, isolation and poor mental health.

Children and the court system

Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. Making child arrangements via the family courts following a separation can be stressful and entrench conflict in families. This can be stressful for children.

Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property.

Declaration

We, the undersigned, will oversee the implementation of the Safeguarding for All Policy and take all necessary steps to ensure it is adhered to.

Name: Kelly-Ann Gordon

Signed:

Position within ESPA: Principal/Owner

Date: 13.02.2022