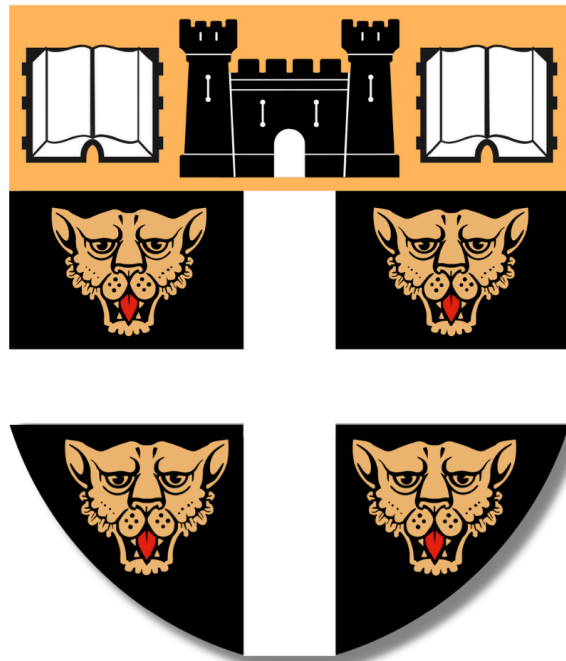


# Safeguarding & Child Protection Policy 2023-24

Dover College



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## What to do if you have a welfare concern in Dover College

### Why are you concerned?

For example:

- Something a child has said - e.g. allegation of harm
- Child's appearance - may include unexplained marks/bruises as well as dress
- Behaviour change(s)
- Witnessed concerning behaviour

### Act immediately and record your concerns. If urgent speak to the DSL first.

Follow the school procedure:

- Reassure the child, listen carefully and be non-judgemental
- Clarify concerns, only use open questions to clarify if necessary (TED: Tell, Explain, Describe)
- Do not promise confidentiality
- Use child's own words, record facts not opinions
- Record the concern in line with school record keeping requirements
- Seek support for yourself if required from DSL (Julie Green)

### Inform the Designated Safeguarding Lead (Julie Green, 07743 807491)

#### Designated Safeguarding Lead

- Consider whether the child is at immediate risk of harm; are they safe to go home?
- If a child is at risk of immediate harm, call the Integrated Front Door on 03000 411111 (outside office hours - 03000 419191) or the Police on 999 immediately
- Access the Kent Safeguarding Support Level Guidance document and procedures: [www.kscmp.org.uk](http://www.kscmp.org.uk)
- Refer to other agencies as appropriate e.g. Internal or community services, Early Help open access, LADO, Police, or make a Request for Support via Integrated Children's Services: 03000 411111
- If unsure then consult with Area Education Safeguarding Advisor (03000 415648) or Local Authority Social Worker at the Front Door [www.kscmp.org.uk](http://www.kscmp.org.uk)

#### If you are unhappy with the response Staff:

- Follow local authority/safeguarding escalation procedures
- Follow Dover College whistleblowing procedures

#### Learners and Parents:

- Follow school complaints procedures <https://www.dovercollege.org.uk/wp-content/uploads/2021/01/Complaints-Policy-Procedure-2020-21.pdf>

### Record decision making and action taken in the learner's child protection/safeguarding file

### Monitor

Be clear about:

- What you are monitoring e.g. behaviour trends, appearance etc.
- How long you will monitor
- Where, how and to whom you will feedback and how you will record

### Review and request further support (if necessary)

At all stages, the child's circumstances will be kept under review  
The DSL/Staff will request further support if required to ensure the **child's safety is paramount**

## 1. Child Focused Approach to Safeguarding

### 1.1 Introduction

- Dover College recognises our statutory responsibility to safeguard and promote the welfare of all children throughout the school and the boarding facilities. Safeguarding is **everybody's** responsibility and everyone has a role to play. All members of our community (staff, volunteers, governors, leaders, parents/carers, wider family networks, and learners) have an important role in safeguarding children and all have an essential role to play in making our community safe and secure.
- Dover College believes that the best interests of children always come first. All children (defined as those up to the age of 18) have a right to be heard and to have their wishes and feelings taken into account and all children regardless of age, gender, ability, culture, race, language, religion or sexual identity or orientation, have equal rights to protection.
- Staff working with children at Dover College will maintain an attitude of 'it could happen here' where safeguarding is concerned. When concerned about the welfare of a child, staff will always act in the best interests of the child and if any member of our community has a safeguarding concern about any child or adult, they should act and act immediately.
- This policy applies where there are any child protection concerns regarding children who attend the school but may also apply to children connected to the school, for example, siblings, or younger members of staff (under 18s) or children on student/work placements.
- Dover College recognises the importance of providing an ethos and environment within school that will help children to be safe and feel safe. In our school children are respected and encouraged to talk openly. We will ensure children's wishes and feelings are taken into account when determining what safeguarding action to take and what services to provide.
- Dover College recognises the importance of adopting a trauma informed approach to safeguarding; we understand there is a need to consider the root cause of children's behaviour and consider any underlying trauma.

Our core safeguarding principles are:

- **Prevention:** positive, supportive, safe culture, curriculum and pastoral opportunities for children, safer recruitment procedures.
- **Protection:** following the agreed procedures, ensuring all staff are trained and supported to recognise and respond appropriately and sensitively to safeguarding concerns.
- **Support:** adopt a child centred approach and provide support for all learners, parents/carers and staff, and where appropriate, implement specific interventions for those who may be at risk of harm.
- **Collaboration:** with both parents where possible, and other agencies to ensure timely, appropriate communications and actions are undertaken when safeguarding concerns arise.

The procedures contained in this policy apply to all staff, including governors, temporary or third-party agency staff and volunteers, and are consistent with those outlined within KCSIE 2023.

## **1.2 Policy Context**

This policy is implemented in accordance with our compliance with the statutory guidance from the Department for Education, 'Keeping Children Safe in Education' 2023 (KCSIE) which requires individual schools and colleges to have an effective child protection policy.

This policy has been developed in accordance with the principles established by the Children Acts 1989 and 2004 and related guidance. This includes but is not limited to:

- Keeping Children Safe in Education 2023 (KCSIE)
- Working Together to Safeguard Children 2018 (WTSC)
- ISI Inspection Framework 2023
- Framework for the Assessment of Children in Need and their Families (2000)
- Kent and Medway Safeguarding Children Procedures
- Early Years and Foundation Stage Framework 2023 (EYFS)
- The Education Act 2002
- The Education (Independent School Standards) Regulations 2014
- The Human Rights Acts 1998
- The Equality Act 2010 (including the Public Sector Equality Duty)
- The National Minimum Standards for Boarding Schools 2022

Section 175 of the Education Act 2002 requires school governing bodies, local education authorities and further education institutions to make arrangements to safeguard and promote the welfare of all children who are pupils at a school, or who are students under 18 years of age. Such arrangements will have to have regard to any guidance issued by the Secretary of State.

Dover College will follow local or national guidance in response to any emergencies. We will amend this policy and our procedures as necessary but regardless of the action required, our safeguarding principles will always remain the same and the welfare of the child is paramount.

Dover College recognises that as a result of the Covid-19 pandemic, some members of our community may have been exposed to a range of adversity and trauma including bereavement, anxiety and in some cases increased welfare and safeguarding risks. We will work with local services, such as health and the local authority, to ensure necessary support is in place.

This policy applies to the whole school community, including boarders.

### 1.3 Definition of Safeguarding

In line with 'Working Together to Safeguard Children' and KCSIE 2023, safeguarding and promoting the welfare of children is defined for the purposes of this policy as:

- providing help and support to meet the needs of children as soon as problems emerge
- protecting children from maltreatment, whether that is within or outside the home, including online
- preventing impairment of children's mental and physical health or development
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care,
- Promoting the upbringing of children with their birth parents, or otherwise their family network, whenever possible and where this is in the best interests of the child(ren)
- taking action to enable all children to have the best outcomes.
- Child protection is part of safeguarding and promoting the welfare of all children and is defined as activity that is 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.

The school acknowledges that safeguarding includes a wide range of specific issues including (but not limited to):

- Abuse and neglect
- Bullying, including cyberbullying
- Child-on-child abuse
- Children with family members in prison
- Children who are absent or missing from education
- Child missing from home or care
- Child Sexual Exploitation (CSE)
- Child Criminal Exploitation (CCE)
- Contextual safeguarding (risks outside the family home)
- County lines and gangs
- Domestic abuse
- Drugs and alcohol misuse
- Fabricated or induced illness
- Faith abuse
- Gender based abuse and violence against women and girls
- Hate
- Homelessness
- Human trafficking and modern slavery
- Mental health
- Nude or semi-nude image sharing, aka youth produced/involved sexual imagery or "Sexting"
- Online safety
- Child on child abuse
- Preventing radicalisation and extremism

- Private fostering
- Relationship abuse
- Serious Violence
- Sexual Violence and Sexual Harassment
- So-Called 'honour-based' abuse including Female Genital Mutilation (FGM) and forced marriage
- Upskirting

(Also see Part One and Annex B within 'Keeping Children Safe in Education' 2023)

#### **1.4 Related Safeguarding Policies**

This policy is one of a series in the school integrated safeguarding portfolio and should be read and actioned in conjunction with the policies as listed below:

- o Behaviour policy
- o Online Safety; Social media and Mobile technology
- o Anti-Bullying
- o Data protection and Information sharing
- o Relationship, Sex and Health Education (RSE)
- o Health and safety,
- o First aid and accidents
- o Managing allegations against staff
- o Staff Code of Conduct, including Acceptable Use of Technology Policies (AUP)
- o Safer recruitment
- o Whistleblowing

#### **Supporting Guidance (to be read and followed alongside this document)**

- o "Guidance for Safer Working Practice for Adults who Work with Children and Young People in Education Settings" - [Safer Recruitment Consortium](https://www.saferrecruitmentconsortium.org/_files/ugd/f576a8_0d079cbe69ea458e9e99fe462e447084.pdf)  
[https://www.saferrecruitmentconsortium.org/\\_files/ugd/f576a8\\_0d079cbe69ea458e9e99fe462e447084.pdf](https://www.saferrecruitmentconsortium.org/_files/ugd/f576a8_0d079cbe69ea458e9e99fe462e447084.pdf)
- o "What to do if you are worried a child is being abused" – DfE, March 2015  
[What to do if you're worried a child is being abused - GOV.UK](#)
- o Early Years Foundation Stage 2021 Welfare Requirements

These documents can be found in the staff intranet.

#### **1.5 Policy Compliance, Monitoring and Review**

Dover College will review this policy at least annually (as a minimum) and will update it as needed, so that it is kept up to date with safeguarding issues as they emerge and evolve, including lessons learnt. The policy will also be revised following any national or local



updates, significant local or national safeguarding events and/or learning, and/or any changes to our own procedures.

All staff (including temporary staff and volunteers) will be provided with a copy of this policy and Part One and/or Annex A of KCSIE 2023. This can be found on the staff intranet.

Parents/carers can obtain a copy of the school Child Protection Policy and other related policies on request. Additionally, our policies can be viewed via the school website (<https://www.dovercollege.org.uk/key-information/policies/>).

The policy forms part of our school development plan and will be reviewed annually by the Governing Body who has responsibility for oversight of safeguarding and child protection systems.

The Designated Safeguarding Lead and headteacher will ensure regular reporting on safeguarding activity and systems to the governing body. The governing body will not receive details of individual learner situations or identifying features of families as part of their oversight responsibility.

## 2. Key Responsibilities

### 2.1 Governance and Leadership

- The governing body and leadership team have a strategic responsibility for our safeguarding arrangements and will comply with their duties under legislation. The governing body has regard to the KCSIE 2023 guidance and will ensure our policies, procedures and training is effective and complies with the law at all times.
- The governing body will facilitate a whole school approach to safeguarding which involves everyone. They will ensure that safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development, so that all systems, processes, and policies operate with the best interests of the child at their heart.
- The governing body are aware of their obligations under the Human Rights Act 1998, the Equality Act 2010, (including the Public Sector Equality Duty), and the local multi-agency safeguarding arrangements set out by the Kent Safeguarding Children Multi-Agency Partnership ([KSCMP](#)).
  - This includes but is not limited to safeguarding all members of the school community (for example, staff, learners, parents/carers and other family members) identified with protected characteristics within the Equality Act; age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, sexual orientation.
  - For further information about our approaches to equality, diversity and inclusion, please access our schools' policies [Our Policies – Dover College](#)
- The governing body and leadership team will ensure that there are policies and procedures in place to ensure appropriate action is taken in a timely manner to safeguard and promote children's welfare.
- The headteacher will ensure that our child protection and safeguarding policies and procedures adopted by the governing body, are understood, and followed by all staff.
- The governing body will ensure an appropriate senior member of staff, from the school leadership team, is appointed to the role of designated safeguarding lead. The governing body and leadership team will ensure that the DSL is supported in their role and is provided with sufficient time so they can provide appropriate support to staff and children regarding any safeguarding and welfare concerns.
- The school has a nominated governor (Paul Tapsell) for safeguarding. The nominated governor will support the DSL and have oversight in ensuring that the school has an effective policy which interlinks with other related policies, that locally agreed procedures are in place and being followed, and that the policies are reviewed at least annually and when required.

### 2.2 Designated Safeguarding Lead (DSL)

The school has appointed Julie Green, Deputy Headteacher Safeguarding, a member of the senior leadership team as the Designated Safeguarding Lead (DSL).

The DSL has overall responsibility for the day-to-day oversight of safeguarding and child protection systems (including online safety) in school. Whilst the activities of the DSL may be delegated to the deputies, the ultimate lead responsibility for safeguarding and child protection remains with the DSL and this responsibility will not be delegated.

The school/college has appointed two Deputy DSLs who will have delegated responsibilities and act in the DSLs absence - Tracey Mills (Prep School Deputy Head), Audrey Turner-Dauncey (St Martin's Housemistress) and Laurence Teeling (Head of Boarding)

The DSL (and any deputies) will be more likely to have a complete safeguarding picture and will be the most appropriate person to advise staff on the response to any safeguarding concerns.

It is the role of the DSL to carry out their functions as identified in Annex C of KCSIE 2023. This includes but is not limited to:

- Acting as the central contact point for all staff to discuss any safeguarding concerns
- Maintain a confidential recording system for safeguarding and child protection concerns
- Coordinating safeguarding action for individual children
- When supporting children with a social worker or looked after children the DSL should have the details of the child's social worker and the name of the virtual school head in the authority that looks after the child (with the DSL liaising closely with the designated teacher)
- Liaising with other agencies and professionals in line with KCSIE 2023 and WTSC 2018
- Ensuring that locally established procedures as put in place by the three safeguarding partners as part of the Kent Safeguarding Children Multi-Agency Partnership (KSCMP) procedures, including referrals, are followed, as necessary.
- Representing , or ensure the school is appropriately represented at multi-agency safeguarding meetings (including Child Protection conferences)
- Manage and monitor the school role in any multi-agency plan for a child.
- Be available during term time (during school hours) for staff in the school to discuss any safeguarding concerns.
- Ensuring adequate and appropriate DSL cover arrangements in response to any closures and any out of hours and/or out of term activities.
- Taking lead responsibility for online safety, including understanding the filtering and monitoring systems and processes in place.
- Help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children, including children with a social worker, are experiencing, or have experienced, with teachers and school leadership staff.
- Ensure all staff access appropriate safeguarding training and relevant updates in line with the recommendations within KCSIE (2023)

- Liaising with the headteacher to inform them of any safeguarding issues, especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations. This includes being aware of the requirement for children to have an Appropriate Adult (PACE Code C 2019).

The DSL will undergo appropriate and specific training to provide them with the knowledge and skills required to carry out their role. Deputy DSLs will be trained to the same standard as the DSL. The DSLs training will be updated formally at least every two years, but their knowledge and skills will be updated through a variety of methods at regular intervals and at least annually.

## **2.3 Members of Staff**

Our staff play a particularly important role in safeguarding as they are in a position to observe any changes in a child's behaviour or appearance, identify concerns early, provide help for children, promote children's welfare and prevent concerns from escalating.

All members of staff have a responsibility to:

- Provide a safe environment in which children can learn.
- Be aware of the indicators of abuse and neglect so that they can identify cases of children who may need help or protection.
- Know what to do if a child tells them that they are being abused, neglected or exploited and understand the impact abuse and neglect can have upon a child.
- Be able to identify and act upon indicators that children are, or at risk of developing mental health issues.
- Be prepared to identify children who may benefit from early help.
- Understand the early help process and their role in it.
- Understand the school safeguarding policies and systems.
- Undertake regular and appropriate training which is regularly updated.
- Be aware of the local process of making referrals to children's social care and statutory assessment under the Children Act 1989.
- Know how to maintain an appropriate level of confidentiality.
- Reassure children who report concerns that they are being taken seriously and that they will be supported and kept safe.
- Act in line with Teachers' Standards 2012 which state that teachers (including headteachers) should safeguard children's wellbeing and maintain public trust in the teaching profession as part of their professional duties.

Staff at Dover College recognise that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as being abusive or harmful. This should not prevent staff from having professional curiosity and speaking to a DSL if they have any concerns about a child.

Staff at Dover College will determine how best to build trusted relationships with children, young people and parents/carers which facilitate appropriate professional communication in line with existing and relevant policies, for example, our staff handbook and pupil behaviour policies.

## **2.4 Children and Young People**

Children and young people (learners) have a right to:

- Feel safe, be listened to, and have their wishes and feelings taken into account.
- Confidently report abuse, knowing their concerns will be treated seriously, and knowing they can safely express their views and give feedback.
- Contribute to the development of school safeguarding policies.
- Receive help from a trusted adult.

- Learn how to keep themselves safe, including online.

## **2.5 Parents and Carers**

Parents/carers have a responsibility to:

- Understand and adhere to the relevant school policies and procedures.
- Talk to their children about safeguarding issues and support the school in their safeguarding approaches.
- Identify behaviours which could indicate that their child is at risk of harm including online.
- Seek help and support from the school or other agencies.

## **3. Child Protection Procedures**

### **3.1 Recognising Indicators of Abuse and Neglect**

Staff will maintain an attitude of 'it could happen here' where safeguarding is concerned. When concerned about the welfare of a child, staff will always act in the best interests of the child.

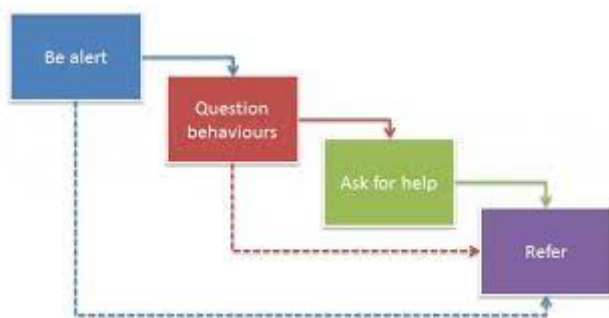
All staff are made aware of the definitions and indicators of abuse and neglect as identified by Working Together to Safeguard Children 2018 and Keeping Children Safe in Education 2023. This is outlined locally within the [Kent support level guidance](#)

Dover College recognise that when assessing whether a child may be suffering actual or potential harm there are four categories of abuse (for more in-depth information, see Appendix 1):

- Physical abuse
- Sexual abuse
- Emotional abuse
- Neglect

By understanding the indicators of abuse and neglect, we can respond to problems as early as possible and provide the right support and services for the child and their family.

All members of staff are expected to be aware of and follow this approach if they are concerned about a child:



This resource may also be useful: 'What to do if you are worried a child is being abused'  
[What to do if you're worried a child is being abused - GOV.UK](#)

Dover College recognises that concerns may arise in many different contexts and can vary greatly in terms of their nature and seriousness. The indicators of child abuse and neglect can vary from child to child. Children develop and mature at different rates, so what appears to be worrying behaviour for a younger child might be normal for an older child. It is important to recognise that indicators of abuse and neglect do not automatically mean a child is being abused; however all concerns should be taken seriously and will be explored by the DSL on a case-by-case basis.

Dover College recognises abuse, neglect, and safeguarding issues are rarely standalone events and cannot always be covered by one definition or one label alone. In many cases, multiple issues will overlap with one another, therefore staff will always be vigilant and always raise concerns with a DSL.

Parental behaviours can indicate child abuse or neglect, so staff will be alert to parent-child interactions or concerning parental behaviours; this could include parents who are under the influence of drugs or alcohol or if there is a sudden change in their mental health.

Children may report abuse happening to themselves, their peers or their family members. All reports made by children to staff will be taken seriously and will be responded to in line with this policy.

Safeguarding incidents and/or behaviours can be associated with factors and risks outside the school. Children can be at risk of abuse or exploitation in situations outside their families; extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, sexual abuse, serious youth violence and county lines.

Dover College recognises that technology can be a significant component in many safeguarding and wellbeing issues. Children are at risk of abuse online from people they

know (including other children) and from people they don't know; in many cases, abuse will take place concurrently via online channels and in daily life.

Dover College recognises that some children have additional or complex needs and may require access to intensive or specialist services to support them.

Following a concern about a child's safety or welfare, the searching and screening of children and confiscation of any items, including any electronic devices, will be managed in line with the school behaviour policy which is informed by the DfE 'Searching, screening and confiscation at school' guidance.

The DSL (or deputy) will be informed of any searching incidents where there were reasonable grounds to suspect a pupil/student was in possession of a prohibited item as listed in our behaviour policy. The DSL (or deputy) will then consider the circumstances of the pupil/student who has been searched to assess the incident against any potential wider safeguarding concerns.

Staff will involve the DSL (or deputy) without delay if they believe that a search has revealed a safeguarding risk.

### **3.2 Responding to Child Protection Concerns**

If staff are made aware of a child protection concern, they are expected to:

- listen carefully to the child, reflecting back the concern.
- use the child's language.
- be non-judgmental.
- avoid leading questions; only prompting the child where necessary with open questions to clarify information where necessary. For example who, what, where, when or Tell, Explain, Describe (TED).
- not promise confidentiality as concerns will have to be shared further, for example, with the DSL and potentially Integrated Children's Services.
- be clear about boundaries and how the report will be progressed.
- record the concern in line with school record keeping requirements (see section 3.3).
- inform the DSL (or deputy), as soon as practically possible.

If staff have any concerns about a child's welfare, they are expected to act on them immediately. If staff are unsure if something is a safeguarding issue, they will speak to the DSL (or deputy).

The DSL or a deputy should always be available to discuss safeguarding concerns. If in exceptional circumstances, a DSL is not available, this should not delay appropriate action being taken. Staff should speak to a member of the senior leadership team and/or take advice from the Education Safeguarding Service or via consultation with a social worker from the



Front Door (see flowchart on page 4). In these circumstances, any action taken will be shared with a DSL as soon as possible.

All staff are made aware that early information sharing is vital for the effective identification, assessment, and allocation of appropriate service provision, whether this is when problems first emerge, or where a child is already known to other agencies. Staff will not assume a colleague, or another professional will act and share information that might be critical in keeping children safe.

Dover College will respond to safeguarding concerns in line with the Kent Safeguarding Children Multi-Agency Partnership procedures (KSCMP). The full KSCMP procedures and additional guidance relating to reporting concerns and specific safeguarding issues can be found on their website: [www.kscmp.org.uk](http://www.kscmp.org.uk)

In Kent, Early Help and Preventative Services and Children's Social Work Services are part of Integrated Children's Services (ICS). Specific information and guidance to follow with regards to accessing support and/or making referrals in Kent can be found here: [www.kelsi.org.uk/support-for-children-and-young-people/integrated-childrens-services](http://www.kelsi.org.uk/support-for-children-and-young-people/integrated-childrens-services)

Where it is identified a child may benefit from Early Help support (as provided by ICS) , the DSL (or deputy) will generally lead as appropriate and make a request for support via the Front Door.

The DSL will keep all Early Help cases under constant review and consideration will be given to escalating concerns to the Front Door or seeking advice via the Education Safeguarding Service if the situation does not appear to be improving or is getting worse.

All staff are made aware of the process for making referrals to Integrated Children's Services and for statutory assessments under the Children Act 1989, especially section 17 (children in need) and section 47 (a child suffering, or likely to suffer, significant harm) that may follow a referral, along with the role they might be expected to play in such assessments.

Where a child is suffering, or is likely to suffer from harm, or is in immediate Danger (for example under section 17 or 47 of the Children Act), a 'request for support' will be made immediately to Kent Integrated Children's Services Front Door - KELS! (via the 'Front Door') and/or the police, in line with KSCMP procedures.

- Dover College recognises that in situations where there are immediate child protection concerns for a child as identified in line with Support Level Guidance, it is NOT to investigate as a single agency, but to act in line with KSCMP guidance which may involve multi-agency decision making.
- The DSL may seek advice or guidance from their Area Education Safeguarding Advisor from the Education Safeguarding Service before deciding next steps.
- They may also seek advice or guidance from a social worker at the Front Door service who are the first point of contact for Integrated Children's Services (ICS).

In the event of a request for support to the Front Door being necessary, parents/carers will be informed and consent to this will be sought by the DSL in line with guidance provided by KSCMP and ICS. Parents/carers will be informed of this, unless there is a valid reason not to do so, for example, if to do so would put a child at risk of harm or would undermine a criminal investigation.

If, after a request for support or any other planned external intervention, a child's situation does not appear to be improving or concerns regarding receiving a decision or the decisions made, staff or the DSL will re-refer (if appropriate) and/or DSLs will follow [KSCMP escalation procedures](#) to ensure their concerns have been addressed and, most importantly, that the child's situation improves. DSLs may request support with this via the Education Safeguarding Service.

DSLs and staff will be mindful of the need for the school to ensure any activity or support implemented to support children and/or families is recorded. Support provided by the school where families are struggling will be overseen and reviewed by the DSL on a regular basis to ensure activity does not obscure potential safeguarding concerns from the wider professional network. Where the school is unsure, advice will be sought from the Education Safeguarding Service.

### **3.3 Recording Concerns**

All safeguarding concerns, discussions and decisions, and reasons for those decisions, will be recorded on My Concern which will pass them without delay to the DSL.

All safeguarding and child protection concerns are recorded on My Concern.

Records will be completed as soon as possible after the incident/event, using the child's words and will be recorded on My Concern by the member of staff. Safeguarding and child protection records will record facts and not personal opinions. A body map will be completed if visible injuries to a child have been observed.

Child Protection records will include: a clear and comprehensive summary of the concern; details of how the concern was followed up and resolved and details regarding any action taken, decisions reached and the outcome.

If members of staff are in any doubt about recording requirements, they will discuss their concerns with the DSL.

Incident/Welfare concern forms are kept in the Bursary. Records will be completed as soon as possible after the incident/event, using the child's words and will be signed and dated by the member of staff. Child protection records will record facts and not personal opinions. A body map will be completed if injuries have been observed.

If there is an immediate concern the member of staff will consult with a DSL before completing the form as reporting urgent concerns takes priority.

Child protection records are kept confidential and stored securely. Child Protection records will be kept for individual children and are maintained separately from all other records relating to the child in the school. Child protection records are kept in accordance with data protection legislation and are retained centrally and securely by the DSL.

All child protection records will be transferred in accordance with data protection legislation to the child's subsequent school/college, under confidential and separate cover as soon as possible; within 5 days for an in-year transfer or within the first 5 days of the start of a new term. Child Protection files will be transferred securely to the new DSL, separately to the child's main file, and a confirmation of receipt will be obtained.

In addition to the child protection file, the DSL will also consider if it would be appropriate to share any information with the DSL at the new school or college in advance of a child leaving. For example, information that would allow the new school or college to continue to provide support.

Where the school receives child protection files, the DSL will ensure key staff such as the Head of Individual Needs, will be made aware of relevant information required.

Where a learner joins the school and no child protection files are received, the DSL will proactively seek to confirm from the previous setting whether any child protections exist for the learner, and if so, if the files have been sent.

### **3.4 Multi-Agency Working**

Dover College recognises the pivotal role we have to play in multi-agency safeguarding arrangements and is committed to its responsibility to work within the KSCMP multi-agency safeguarding arrangements as identified within 'Working Together to Safeguard Children'.

The leadership team, governing body and DSL will work to establish strong and co-operative local relationships with professionals in other agencies, including the safeguarding partners in line with local and national guidance.

Dover College recognises the importance of multi-agency working and is committed to working alongside partner agencies to provide a coordinated response to promote children's welfare and protect them from harm. This includes contributing to KSCMP processes as required. Such as, participation in relevant safeguarding multi-agency plans and meetings, including Child Protection Conferences, Strategy Meetings, Child in Need meetings or other early help multi-agency meetings.

The School will allow access for Kent Children's Social Work Service and, where appropriate, from a placing local authority, to conduct, or to consider whether to conduct, a section 17 or a section 47 assessment.

The headteacher and DSL are aware of the requirement for children to have an Appropriate Adult (PACE Code C 2019) where there is a need for detention, treatment and questioning by police officers and will respond to concerns in line with our school behaviour policy, which is informed by the DfE 'Searching, screening and confiscation at school' guidance.

### **3.5 Confidentiality and Information Sharing**

Dover College recognises our duty and powers to hold, use and share relevant information with appropriate agencies in matters relating to child protection at the earliest opportunity as per statutory guidance outlined within KCSIE 2023.

Where reasonably possible, the school will hold more than one emergency contact number for each pupil/student. There is an expectation that contact information will be held for both parents, unless doing so would put a child at risk of harm.

Dover College has a Data Protection Officer (DPO) as required by the General Data Protection Regulations (GDPR) to ensure that our school is compliant with all matters relating to confidentiality and information sharing requirements: Sue Davis Director of Finance and Operations.

Staff will have due regard to the relevant data protection principles, which allow them to share and withhold personal information. The Data Protection Act 2018 and UK GDPR do not prevent the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children (KCSIE 2023). KCSIE 2023, the Information Commissioner's Office (ICO) and the DfE "Information sharing advice for safeguarding practitioners" (2018) guidance provides further details regarding information sharing principles and expectations.

The headteacher and DSL will disclose relevant safeguarding information about a student with staff on a 'need to know' basis.

All members of staff must be aware that whilst they have duties to keep information confidential, in line with our privacy notice

<https://www.dovercollege.org.uk/wp-content/uploads/2023/09/Privacy-Notice-2023-24-1.pdf>

Staff also have a professional responsibility to be proactive in sharing information as early as possible to help identify, assess, and respond to risks or concerns about the safety and welfare of children; this may include sharing information with the DSL and with other agencies as appropriate.

In regard to confidentiality and information sharing staff will only involve those who need to be involved, such as the DSL (or a deputy) and Kent Integrated Children's Services. All staff are aware they cannot promise a child that they will not tell anyone about a report of any form of abuse, as this may not be in the best interests of the child.

### **3.6 Complaints**

All members of the school community should feel able to raise or report any concerns about children's safety or potential failures in the school safeguarding regime. The school has a Complaints Procedure available to parents, learners and members of staff and visitors who wish to report concerns or complaints. This can be found on the staff intranet and school website.

Whilst we encourage members of our community to report concerns and complaints directly to us, we recognise this may not always be possible. Children, young people, and adults who have experienced abuse at school can contact the NSPCC 'Report Abuse in Education' helpline on 0800 136 663 or via email: [help@nspcc.org.uk](mailto:help@nspcc.org.uk)

Staff can also access the NSPCC whistleblowing helpline if they do not feel able to raise concerns regarding child protection failures internally.

Staff can call 0800 028 0285 (8:00 AM to 8:00 PM Monday to Friday) or email [help@nspcc.org.uk](mailto:help@nspcc.org.uk).

The leadership team at Dover College will take all concerns reported to the school seriously and all complaints will be considered and responded to in line with the relevant and appropriate process.

Anything that constitutes an allegation against a member of staff or volunteer will be dealt with in line with section 8 of this policy.

## **4. Specific Safeguarding Issues**

Dover College is aware of a range of specific safeguarding issues and situations that can put children at greater risk of harm. In addition to Part One, DSLs, school leaders and staff who work directly with children will read Annex B of KCSIE 2023 which contains important additional information about specific forms of abuse and safeguarding issues.

Where staff are unsure how to respond to specific safeguarding issues, they should follow the processes as identified in part 3 of this policy and speak with the DSL or a deputy.

### **4.1 Child on Child Abuse**

All members of staff at Dover College recognise that children can abuse other children (referred to as child-on-child abuse, previously known as peer-on-peer abuse), and that it can happen both inside and outside of school and online.

As a day and boarding school Dover College recognises that it has additional factors to be vigilant of in relation to the National Minimum Standards for boarding school including the additional vulnerabilities of SEND pupils and the risks associated with children sharing overnight accommodation.

Dover College recognises that child on child abuse can take many forms, including but not limited to:

- Bullying, including cyberbullying, prejudice-based and discriminatory bullying
- abuse in intimate personal relationships between children (sometimes known as 'teenage relationship abuse')
- physical abuse which can include 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 (also known as sexting or youth produced sexual imagery)
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- upskirting (which is a criminal offence), 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
- initiation/hazing type violence and rituals

Any allegations of child-on-child abuse will be recorded, investigated, and dealt with in line with this child protection policy and KCSIE 2023 (in particular, part two and five).

Dover College adopts a zero-tolerance approach to child-on-child abuse. We believe that abuse is abuse and it will never be tolerated or dismissed as "just banter", "just having a laugh", "part of growing up" or "boys being boys"; this can lead to a culture of unacceptable behaviours and can create an unsafe environment for children and a culture that normalises abuse, which can prevent children from coming forward to report it.

All staff have a role to play in challenging inappropriate behaviours between children. Staff recognise that some child-on-child abuse issues may be affected by gender, age, ability and culture of those involved. For example, for gender based abuse, girls are more likely to be victims and boys more likely to be perpetrators.

Dover College recognises that even if there are no reported cases of child-on-child abuse, such abuse is still likely to be taking place and it may be the case that it is just not being

reported. As such, it is important that staff speak to the DSL (or deputy) about any concerns regarding child-on-child abuse.

In order to minimise the risk of child-on-child abuse, Dover College will:

- implement a robust anti-bullying policy
- provide an age/ability appropriate PSHE and RSE curriculum
- providing a range of reporting mechanisms e.g. worry boxes, dedicated reporting emails monitored by DSLs

Dover College wants children to feel able to confidently report abuse and know their concerns will be treated seriously. All allegations of child-on-child abuse will be reported to the DSL and will be recorded, investigated, and dealt with in line with associated school policies, including child protection, anti-bullying and behaviour. Learners who experience abuse will be offered appropriate support, regardless of where the abuse takes place.

Concerns about pupils' behaviour, including child-on-child abuse taking place offsite will be responded to as part of a partnership approach with pupils and parents/carers. Offsite behaviour concerns will be recorded and responded to in line with existing appropriate policies, for example anti-bullying, acceptable use, behaviour and child protection policies

Alleged victims, perpetrators and any other child affected by child on child abuse will be supported by:

- taking reports seriously
- listening carefully,
- avoiding victim blaming,
- providing appropriate pastoral support,
- working with parents/carers,
- reviewing educational approaches
- following procedures as identified in other policies e.g. the school anti-bullying, behaviour and child protection policy, and where necessary and appropriate, informing the police and/or Integrated Care Systems.
- being reassured that the law on child-on-child abuse is there to protect them, not criminalise them.

#### **4.2 Child-on-child sexual violence and sexual harassment**

When responding to concerns relating to child on child sexual violence or harassment, Dover College will follow the guidance outlined in Part Five of KCSIE 2023.

Dover College recognises that sexual violence and sexual abuse can happen anywhere, and all staff will maintain an attitude of 'it could happen here.' Dover College recognises sexual violence and sexual abuse 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 and can occur online and face to face (both physically and verbally), sometimes simultaneously between the two. Sexual violence and sexual harassment is never acceptable.

All victims of sexual violence or sexual harassment will be reassured that they are being taken seriously, regardless of how long it has taken them to come forward, and that they will be supported and kept safe. A victim will never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment or be made to feel ashamed for making a report.

Abuse that occurs online or outside of the school will not be dismissed or downplayed and will be treated equally seriously and in line with relevant policies/procedures, for example anti-bullying, behaviour, child protection, online safety.

Dover College recognises that an initial disclosure to a trusted adult may only be the first incident reported, rather than representative of a singular incident and that trauma can impact memory, so children may not be able to recall all details or timeline of abuse. All staff will be aware certain children may face additional barriers to telling someone, for example because of their vulnerability, disability, sex, ethnicity, and/or sexual orientation.

The DSL (or deputy) is likely to have a complete safeguarding picture and will be the most appropriate person to advise on the initial response:

- The DSL will make an immediate risk and needs assessment which will be considered on a case-by-case basis which explores how best to support and protect the victim and the alleged perpetrator, and any other children involved/impacted, in line with part five of KCSIE 2023 and relevant local/national guidance and support, for example KSCMP procedures and support from the Education Safeguarding Service.
- The risk and needs assessment will be recorded and kept under review and will consider the victim (especially their protection and support), the alleged perpetrator, and all other children, and staff and any actions that are required to protect them.
- Any concerns involving an online element will take place in accordance with relevant local/national guidance and advice.

Reports will initially be managed internally by the school and where necessary will be referred to Integrated Children's Services (Early Help and/or Children's Social Work Service) and/or the police. Important considerations which may influence this decision include:

- the wishes of the victim in terms of how they want to proceed.
- the nature of the alleged incident(s), including whether a crime may have been committed and/or whether Harmful Sexual Behavior has been displayed.
- the ages of the children involved.
- the developmental stages of the children involved.
- any power imbalance between the children.



- if the alleged incident is a one-off or a sustained pattern of abuse - sexual abuse can be accompanied by other forms of abuse and a sustained pattern may not just be of a sexual nature.
- that sexual violence and sexual harassment can take place within intimate personal relationships between children.
- understanding intra familial harms and any necessary support for siblings following incidents.
- whether there are any ongoing risks to the victim, other children, adult students, or school staff.
- any other related issues and wider context, including any links to child sexual exploitation and child criminal exploitation.

The school will in most instances engage with both the victim's and alleged perpetrator's parents/carers when there has been a report of sexual violence; this might not be necessary or proportionate in the case of sexual harassment and will depend on a case-by-case basis. The exception to this is if there is a reason to believe informing a parent/carer will put a child at additional risk. Any information shared with parents/carers will be in line with information sharing expectations, our confidentiality policy, and any data protection requirements, and where they are involved, will be subject to discussion with other agencies (for example Children's Social Work Service and/or the police) to ensure a consistent approach is taken.

If at any stage the DSL is unsure how to proceed, advice will be sought from the Education Safeguarding Service.

### 4.3 Nude and/or Semi-Nude Image Sharing by Children

Dover College recognises that consensual and non-consensual sharing of nudes and semi-nude images and/or videos (also known as youth produced/involved sexual imagery or “sexting”) can be a safeguarding issue; all concerns will be reported to and dealt with by the DSL (or deputy).

When made aware of concerns involving consensual and non-consensual sharing of nudes and semi-nude images and/or videos by children, staff are advised to:

- Report any concerns to the DSL immediately.
- never to view, copy, print, share, forward, store or save the imagery, or ask a child to share or download it – this may be illegal. If staff have already inadvertently viewed imagery, this will be immediately reported to the DSL.
- Not delete the imagery or ask the child to delete it.
- Not say or do anything to blame or shame any children involved.
- Explain to child(ren) involved that they will report the issue to the DSL and reassure them that they will receive appropriate support and help.
- Not ask the child or children involved in the incident to disclose information regarding the imagery and not share information about the incident with other members of staff, the child(ren) involved or their, or other, parents and/or carers. This is the responsibility of the DSL.

DSLs will respond to concerns in line with the non-statutory UKCIS guidance: Sharing nudes and semi-nudes: advice for education settings working with children and young people and the local KSCMP guidance. When made aware of a concern involving consensual and non-consensual sharing of nudes and semi-nude images and/or videos:

- the DSL will hold an initial review meeting to explore the context and ensure appropriate and proportionate safeguarding action is taken in the best interests of any child involved. This may mean speaking with relevant staff and the children involved as appropriate.
- parents and carers will be informed at an early stage and be involved in the process to best support children, unless there is good reason to believe that involving them would put a child at risk of harm.
- All decisions and action taken will be recorded in line with our child protection procedures.
- a referral will be made to ICS and/or the police immediately if:
  - the incident involves an adult (over 18).
  - there is reason to believe that a child has been coerced, blackmailed, or groomed, or there are concerns about their capacity to consent, for example, age of the child or they have special educational needs.
  - the image/videos involve sexual acts and a child under the age of 13, depict sexual acts which are unusual for the child’s developmental stage, or are violent.

- a child is at immediate risk of harm owing to the sharing of nudes and semi-nudes.
- The DSL may choose to involve other agencies at any time if further information/concerns are disclosed at a later date.
- If DSLs are unsure how to proceed, advice will be sought from the Education Safeguarding Service.

#### **4.4 Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)**

Dover College recognises that both CSE and CCE are forms of abuse that occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in sexual or criminal activity, in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. CSE and CCE can affect children, both male and female and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation.

Dover College recognises that children can become trapped in CCE as perpetrators can threaten victims and their families with violence or entrap and coerce them into debt. Children involved in criminal exploitation often commit crimes themselves which can mean their vulnerability as victims is not always recognised (particularly older children) and they are not treated as victims, despite the harm they have experienced. The experience of girls who are criminally exploited can also be very different to that of boys. We also recognise that boys and girls being criminally exploited may be at higher risk of child sexual exploitation (CSE).

Dover College recognises that CSE can occur over time or be a one-off occurrence and may happen without the child's immediate knowledge, for example through others sharing videos or images of them on social media. CSE can affect any child who has been coerced into engaging in sexual activities and includes 16 and 17 year olds who can legally consent to have sex. Some children may not realise they are being exploited, for example they may believe they are in a genuine romantic relationship.

If staff are concerned that a child may be at risk of CSE or CCE, immediate action should be taken by speaking to the DSL or a deputy.

#### **4.5 Serious Violence**

All staff are made aware of the indicators which may signal children are at risk from or are involved with serious violent crime. These may include unexplained gifts or new possessions, increased absence from school, 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 that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of CCE.

Any concerns regarding serious violence will be reported and responded to in line with other child protection concerns by speaking with a DSL or deputy. The initial response to child victims is important and staff will take any allegations seriously and work in ways that support children and keep them safe.

#### **4.6 Modern Slavery**

- Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs. Further information on the signs that someone may be a victim of modern slavery, the support available to victims and how to refer them to the NRM is available in the Statutory Guidance: [Modern slavery: how to identify and support victims](#).
- If there are concerns that any member of the community is a victim or involved with modern slavery, concerns should be shared with a DSL or deputy and will be responded to in line with this policy.

#### **4.7 So-called honour based abuse (HBA)**

So-called 'honour'-based abuse (HBA) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing.

All forms of HBA are abuse (regardless of the motivation) and concerns should be responded to in line with Section 3 of this policy. Staff will report any concerns about HBA to the DSL (or a deputy). If there is an immediate threat, the police will be contacted.

All staff will speak to the DSL (or deputy) if they have any concerns about forced marriage. Staff can also contact the Forced Marriage Unit if they need advice or information: 020 7008 0151 or [fm@fcdo.gov.uk](mailto:fm@fcdo.gov.uk)

Whilst all staff will speak to the DSL (or deputy) if they have any concerns about FGM, there is a specific legal reporting duty on teachers.

- 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 in England and Wales, to personally report to the police where they discover that FGM appears to have been carried out on a girl.
- It will be rare for teachers to see visual evidence, and they should not be examining learners, however teachers who do not personally report such concerns may face disciplinary sanctions. Further information on when and how to make a report can be found at: [Mandatory reporting of female genital mutilation procedural information](#) and [FGM Mandatory reporting Duty Fact Sheet](#).

Unless the teacher has good reason not to, they are expected to also discuss any FGM concerns with the DSL (or a deputy), and Kent Integrated Childrens Services should be informed as appropriate.

#### **4.8 Preventing radicalisation**

Dover College recognises that children are vulnerable to extremist ideology and radicalisation. Dover College is aware of our duty under section 26 of the Counter-Terrorism and Security Act 2015 (the CTSA 2015), to have “due regard to the need to prevent people from being drawn into terrorism”, also known as the Prevent duty and the specific obligations placed upon us as an education provider regarding risk assessments, working in partnership, staff training, and IT policies.

All staff have received appropriate training to enable them to be alert to changes in children’s behaviour which could indicate that they may need help or protection from radicalisation. Staff accessed a Workshop to Raise Awareness of Prevent (WRAP) training in January 2023 and this will be updated at least every two years in line with Prevent Kent and Medway recommendations.

Staff will report any concerns to the DSL (or a deputy), who is aware of the local procedures to follow. If there is an immediate threat the police will be contacted via 999.

#### **4.9 Cybercrime**

Dover College recognises that children with particular skill and interest in computing and technology may inadvertently or deliberately stray into ‘cyber-enabled’ (crimes that can happen offline but are enabled at scale and at speed online) or ‘cyber dependent’ (crimes that can be committed only by using a computer/internet enabled device) cybercrime.

If staff are concerned that a child may be at risk of becoming involved in cyber-dependent cybercrime, the DSL or a deputy will be informed, and consideration will be given to accessing local support and/or referring into the Cyber Choices programme, which aims to intervene when young people are at risk of committing, or being drawn into, low level cyber-dependent offences and divert them to a more positive use of their skills and interests.

Where there are concerns about ‘cyber-enabled’ crime such as fraud, purchasing of illegal drugs online, child sexual abuse and exploitation, or other areas of concern such as online bullying or general online safety, they will be responded to in line with this and other appropriate policies.

#### **4.10 Domestic abuse**

- Dover College recognises that:
  - o domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents.
  - o domestic abuse can include, but is not limited to, psychological (including coercive control), physical, sexual, economic, or emotional abuse.

- o children can be victims of domestic abuse if they see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse).
  - o 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.
  - o domestic abuse can take place within different types of relationships, including ex-partners and family members.
  - o there is always a potential for domestic abuse to take place when parents/families separate, or for existing domestic abuse to persist or escalate post separation.
  - o domestic abuse can have a detrimental and long-term impact on children's health, well-being, development, and ability to learn.
  - o domestic abuse concerns will not be looked at in isolation and our response will be considered as part of a holistic approach which takes into account children's lived experiences.
  - o it is important not to use victim blaming language and to adopt a trauma informed approach when responding to concerns relating to domestic abuse.
- If staff are concerned that a child may be at risk of seeing, hearing, or experiencing the effects of any form of domestic abuse, or in their own intimate relationships, immediate action should be taken by speaking to the DSL or a deputy.
  - Dover College is an Operation Encompass School. This means we work in partnership with Kent Police to provide support to children experiencing the effects of domestic abuse. An Operation Encompass notification is sent to the school when the police are called to an incident of domestic abuse and there are children in the household; the police are expected to inform schools before the child(ren) arrive the following day.
    - o Operation Encompass notifications help ensure that we have up to date and relevant information about children's circumstances and enables us to put immediate support in place according to the child's needs.
    - o Operation Encompass does not replace statutory safeguarding procedures and where appropriate, a referral to the front door will be made if there are any concerns about a child's welfare.
    - o Where the school is unsure of how to respond to a notification, advice will be sought from the Education Safeguarding Service or the Operation Encompass helpline which is available 8AM to 1PM, Monday to Friday on 0204 513 9990.

#### **4.11 Mental health**

All staff recognise that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

Staff are aware that children's experiences, for example where children have suffered abuse and neglect, or other potentially traumatic Adverse Childhood Experiences (ACEs), can impact on their mental health, behaviour, and education.

Staff are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.

If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken by speaking to the DSL or a deputy.

Dover College has identified both Jo Irwin and Chris Scoble who boarders and day pupils may contact directly about personal problems or concerns at the school. They are known as the 'independent listener'. Children know who these people are, know how to contact them and should feel comfortable talking to them. Jo Irwin and Chris Scoble are easily accessible.

## **5. Supporting Children Potentially at Greater Risk of Harm**

Whilst all children should be protected, Dover College acknowledge some groups of children are potentially at greater risk of harm. This can include the following groups:

### **5.1 Safeguarding Children with Special Educational Needs or Disabilities (SEND)**

Dover College acknowledges that children with special educational needs or disabilities (SEND) or certain health conditions can face additional safeguarding challenges and barriers for recognising abuse and neglect.

Dover College recognises that children with SEND may face additional communication barriers and experience difficulties in managing or reporting abuse or challenges. Children with SEND will be appropriately supported to communicate and ensure that their voice is heard and acted upon.

All members of staff will be encouraged to appropriately explore possible indicators of abuse such as behaviour, mood changes or injuries and not to assume that they are related to the child's disability. Staff will be mindful that children with SEND or certain medical conditions may be disproportionately impacted by behaviours such as bullying, without outwardly showing any signs.

Members of staff are encouraged to be aware that children with SEND can be disproportionately impacted by safeguarding concerns, such as exploitation, peer group isolation or bullying including prejudice-based bullying.

To address these additional challenges, Dover College will always consider implementing extra pastoral support and attention for children with SEND. The DSL will work closely with the Head of Individual Needs (Joy Ellerington) to plan support as required.

## **5.2 Children Requiring Mental Health Support**

Dover College has an important role to play in supporting the mental health and wellbeing of our pupils. Mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

Staff are aware that children's experiences, for example where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, can impact on their mental health, behaviour and education.

Staff are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.

If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken by speaking to the DSL or a deputy who will escalate and refer as appropriate, for example to the school counsellor.

Age/ability appropriate education will be provided to our pupils to help promote positive health, wellbeing and resilience. PSHE is delivered weekly through 'Jigsaw's mindful approach to PSHE', the scheme includes mindfulness practice in each lesson.

The DSL has been trained as a Senior Mental Health Lead and promotes learners emotional health and wellbeing through: assemblies, peer mentoring, notice board, email updates with suggestions for managing mental health at times of stress e.g. exam season.

## **5.3 Children who are absent from education**

- Children being absent from education for prolonged periods and/or on repeat occasions can act as a vital warning sign to a range of safeguarding issues including neglect, child sexual and child criminal exploitation - particularly county lines.
- A robust response to children who are absent from education for prolonged periods and/or on repeat occasions will support the identification of such abuse and may help prevent the risk of children going missing in the future. This includes when problems are first emerging and also where children are already known to Kent Integrated Children's Services and/or have a social worker (such as a child who is a child in need or who has a child protection plan, or is a looked after child), where being absent from education may increase known safeguarding risks within the family or in the community.



- Where possible, the college will hold more than one emergency contact number for each learner, so we have additional options to make contact with a responsible adult if a child missing education is also identified as a welfare and/or safeguarding concern (see section 3.5).
- Where the school/college have concerns that a child is missing from education, we will respond in line with our statutory duties (DfE: [Children missing education](#)) and local policies. Local support is available via the [PRU, Inclusion and Attendance Service \(PIAS\)](#).

#### **5.4 Elective Home Education (EHE)**

- Where a parent/carer expresses their intention to remove a child from school with a view to educating at home, we will respond in line with [national Elective Home Education guidance](#) and local [Kent guidance](#).
- We will work together with parents/carers and other key professionals and organisations to ensure decisions are made in the best interest of the child.

#### **5.5 Children who need a Social Worker (child in need and child protection plans)**

The DSL will hold details of social workers working with children in the school so that decisions can be made in the best interests of the child's safety, welfare, and educational outcomes.

Where children have a social worker, this will inform school decisions about their safety and promoting their welfare, for example, responding to unauthorised absence and provision of pastoral and/or academic support.

#### **5.6 Looked after children, previously looked after children and care leavers**

Dover College recognises the common reason for children becoming looked after is as a result of abuse and/or neglect and a previously looked after child also potentially remains vulnerable.

Julie Green, Designated Safeguarding Lead will work with the local authority including the [Virtual School Kent \(including the virtual school head\)](#), to promote the educational achievement of registered pupils who are looked after or who have been previously looked after.

The DSL will ensure appropriate staff have the information they need in relation to a child's looked after legal status, contact arrangements with birth parents or those with parental responsibility, care arrangements and the levels of authority delegated to the carer by the authority looking after them.

Where a child is looked after, the DSL will hold details of the social worker and the name of the virtual school head in the authority that looks after the child.

Where the school believe a child is being cared for as part of a private fostering arrangement (occurs when a child under 16 or 18 if the child is disabled is cared for and lives with an adult who is not a relative for 28 days or more) there is a duty to recognise these arrangements and inform the Local Authority via the front door.

Where a child is leaving care, the DSL will hold details of the local authority Personal Advisor appointed to guide and support them and will liaise with them as necessary regarding any issues of concern.

### **5.7 Children who are Lesbian, Gay, Bi or Trans (LGBT)**

The fact that a child or a young person may be LGBT is not in itself an inherent risk factor for harm, however, Dover College recognises that children who are LGBT or are perceived by other children to be LGBT (whether they are or not) can be targeted by other children or others within the wider community.

Dover College recognises risks can be compounded where children who are LGBT lack a trusted adult with whom they can be open. LGBT is included within the Relationship and Sex Education and Health Education curriculum and our staff will endeavour to reduce the additional barriers faced and provide a safe space for children to speak out or share any concerns.

### **5.8 Children who are privately fostered**

- Private fostering occurs when a child under the age of 16 (under 18 for children with a disability) is provided with care and accommodation by a person who is not a parent, person with parental responsibility for them or a relative in their own home. A child is not privately fostered if the person caring for and accommodating them has done so for less than 28 days and does not intend to do so for longer. Such arrangements may come to the attention of our staff through the normal course of their interaction, and promotion of learning activities, with children.
- Where private fostering arrangements come to the attention of the school/college, we must notify Kent Integrated Children's Services in line with the local KSCMP arrangements in order to allow the local authority to check the arrangement is suitable and safe for the child.

## **6. Online Safety**

See Online Safety Policy.

It is essential that children are safeguarded from potentially harmful and inappropriate material or behaviours online. Dover College will adopt a whole school approach to online safety which will empower, protect and educate our learners and staff in their use of technology, and establish mechanisms to identify, intervene in, and escalate any concerns where appropriate.

Dover College will ensure online safety is reflected as required in all relevant policies. Online safety is considered as running an interrelated theme when devising and implementing our policies and procedures and when planning our curriculum, staff training, the role and responsibilities of the DSL and parental engagement.

Dover College identifies that the breadth of issues classified within online safety is considerable, but can be categorised into four areas of risk:

- Content - being exposed to illegal, inappropriate or harmful content, for example, pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism.
- Contact - being subjected to harmful online interaction with other users. For example, peer to peer pressure, commercial advertising and adults posing as children or young people with the intention to groom or exploit them for sexual, criminal, financial or other purposes.
- Conduct - personal online behaviour that increases the likelihood of, or causes, harm, for example, making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography), sharing other explicit images and online bullying.
- Commerce - risks such as online gambling, inappropriate advertising, phishing and / or financial scams.

Dover College recognises that technology, and the risks and harms related to it, evolve and change rapidly. The school will carry out a periodic review of our approaches to online safety. The headteacher will be informed of online safety concerns by the DSL, as appropriate.

### **6.1 Policies and Procedures**

The DSL has overall responsibility for online safety within the school but will liaise with other members of staff, for example IT Staff, Heads of Department etc. as necessary.

The DSL will respond to online safety concerns reported in line with our child protection and other associated policies, including our anti-bullying and behaviour policies.

Internal sanctions and/or support will be implemented as appropriate.

Where necessary, concerns will be escalated and reported to relevant partner agencies in line with local policies and procedures.

Dover College uses a wide range of technology. This includes computers, laptops, tablets and other digital devices, the internet, our learning platform, intranet and email systems.

All School owned devices and systems will be used in accordance with our acceptable use policies and with appropriate safety and security measures in place.

Dover College recognises the specific risks that can be posed by mobile and smart technology, including mobile/smart phones, cameras and wearable technology. In accordance with KCSIE 2023 and EYFS Dover College has an appropriate online safety policy in place, which is shared and understood by all members of the community. This policy can be found in the staff intranet.

## **6.2 Appropriate Filtering and Monitoring**

- Dover College will do all we reasonably can to limit children’s exposure to online harm through school issued devices and networks and in line with the requirements of the Prevent Duty and KCSIE, we will ensure that appropriate filtering and monitoring systems are in place.
  - When implementing appropriate filtering and monitoring, Dover College will ensure that “over blocking” does not lead to unreasonable restrictions as to what children can be taught with regards to online teaching and safeguarding.
  - Whilst filtering and monitoring is an important part of our online safety responsibilities, it is only one part of our approach to online safety and we recognise that we cannot rely on filtering and monitoring alone to safeguard our learners; effective safeguarding practice, robust policies, appropriate classroom/behaviour management and regular education/training about safe and responsible use is essential and expected.
    - Learners will use appropriate search tools, apps and online resources as identified by staff.
    - Internet use will be supervised by staff as appropriate, considering learners age, ability and potential risk of harm. For example learners identified as being at “potentially greater risk of harm” will be directly supervised wherever possible,

## **Responsibilities**

- Our governing body has overall strategic responsibility for our filtering and monitoring approaches, including ensuring that our filtering and monitoring systems are regularly reviewed, and that the leadership team and relevant staff have an awareness and understanding of the appropriate filtering and monitoring provisions in place, manage them effectively and know how to escalate concerns when identified.
- Julie Green, a member of the senior leadership team and Paul Tapsell, governor, are responsible for ensuring that our school has met the DfE Filtering and monitoring standards for schools and colleges.
- Our senior leadership team are responsible for
  - o procuring filtering and monitoring systems.
  - o documenting decisions on what is blocked or allowed and why.
  - o reviewing the effectiveness of our provision.
  - o overseeing reports.
  - o ensuring that all staff understand their role, are appropriately trained, follow policies, processes and procedures and act on reports and concerns.
  - o ensuring the DSL and IT staff have sufficient time and support to manage their filtering and monitoring responsibilities.
- The DSL has lead responsibility for overseeing and acting on:
  - o any filtering and monitoring reports.
  - o any child protection or safeguarding concerns identified.
  - o checks the filtering and monitoring system.
- The IT staff have technical responsibility for:
  - o maintaining filtering and monitoring systems.
  - o providing filtering and monitoring reports.
  - o completing technical actions identified following any concerns or checks to systems.
  - o working with the senior leadership team and DSL to procure systems, identify risks, carry out reviews and carry out checks.
- All members of staff are provided with an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring as part of our induction process, and in our child protection staff training.

- All staff, learners and parents/carers have a responsibility to follow this policy to report and record any filtering or monitoring concerns.

### **Decision making and reviewing our filtering and monitoring provision**

- When procuring and/or making decisions about our filtering and monitoring provision, our senior leadership team works closely with the DSL and the IT staff. Decisions have been recorded and informed by an approach which ensures our systems meet our school specific needs and circumstances, including but not limited to our learner risk profile and specific technology use.
- Any changes to the filtering and monitoring approaches will be assessed by staff with safeguarding, educational and technical experience and, where appropriate, with consent from the leadership team; all changes to the filtering policy are logged and recorded.
- Our school undertakes an at least annual review of our filtering and monitoring systems to ensure we understand the changing needs and potential risks posed to our community.
- In addition, our school undertakes regular checks on our filtering and monitoring systems, which are logged and recorded, to ensure our approaches are effective and can provide assurance to the governing body that we are meeting our safeguarding obligations.
  - These checks are achieved by:
    - Routine maintenance of the filtering and monitoring systems by the IT staff
    - Termly checks undertaken by the DSL and Digital Safeguarding Advisor to ensure the system is working as intended
    - Logs of the filtering and monitoring systems brought to Online Safety Group meetings to be reviewed
    - System checks termly in the Bursary with the IT staff, Digital Safeguarding Advisor and DSL present to ensure the filtering and monitoring system is meeting the requirements of the college
    - Flagging urgent system issues to the IT staff to be mitigated internally, or by our external providers (Orbital Net & Smoothwall)

## Appropriate filtering

Dover College's education broadband connectivity is provided through Orbital Net and Dover College uses a Smoothwall filtering system.

- o Smoothwall is a member of [Internet Watch Foundation \(IWF\)](#).
- o Smoothwall has signed up to Counter-Terrorism Internet Referral unit list (CTIRU)
- o Smoothwall is blocking access to illegal content including child sexual abuse material (CSAM).
- o Smoothwall blocks access to sites which could promote or include harmful and/or inappropriate behaviour or material. This includes content which promotes discrimination or extremism, drugs/substance misuse, malware/hacking, gambling, piracy and copyright theft, pro-self-harm, eating disorder and/or suicide content, pornographic content and violent material.

We filter internet use on all school owned, or provided, internet enabled devices and networks. This is achieved by:

- Our filtering system is operational, up to date and is applied to all users, including guest accounts, all school owned devices and networks, and all devices using the school broadband connection.
- We work with Orbital Net/Smoothwall and our IT staff to ensure that our filtering policy is continually reviewed to reflect our needs and requirements.
- If there is failure in the software or abuse of the system, for example if learners or staff accidentally or deliberately access, witness or suspect unsuitable material has been accessed, they are required to:
  - Turn off their monitor/screen
  - Lock the device screen using Jamf Teacher (if a student iPad)
  - Confiscate the device immediately
  - Report the concern to the DSL
  - Report the URL to IT staff if identifiable

- Filtering breaches will be reported to the DSL and technical staff and will be recorded and escalated as appropriate and in line with relevant policies, including our child protection, acceptable use, and behaviour policies.
- Parents/carers will be informed of filtering breaches involving their child.
- Any access to material believed to indicate a risk of significant harm, or that could be illegal, will be reported as soon as it is identified to the appropriate agencies, including but not limited to the [Internet Watch Foundation](#) (where there are concerns about child sexual abuse material), [Kent Police](#), [NCA-CEOP](#) or [Kent Integrated Children's Services](#).
- If staff are teaching topics which could create unusual activity on the filtering logs, or if staff perceive there to be unreasonable restrictions affecting teaching, learning or administration, they will report this to the DSL and/or leadership team.

### **Appropriate monitoring**

- We will appropriately monitor internet use on all school provided devices and networks. This is achieved by:
  - physical monitoring (supervision)
  - proactive real-time monitoring that captures user activity as it happens, updating our monitoring system with potential risks automatically
  - Online and offline monitoring for word documents, messaging apps, games/apps etc.
  - Automatic pre-grading by Smoothwall moderates that review captures to prevent false positives or to escalate urgent risks by telephone to DSL & integrates with MyConcern
  - Alerts sent in real-time to Safeguarding Staff and IT Manager

All users will be informed that use of our devices and networks can/will be monitored and that all monitoring is in line with data protection, human rights and privacy legislation.

- If a concern is identified via our monitoring approaches:



- o Where the concern relates to learners, it will be reported to the DSL and will be recorded and responded to in line with relevant policies, such as child protection, acceptable use, and behaviour policies.
  - o Where the concern relates to staff, it will be reported to the headteacher (or chair of governors if the concern relates to the headteacher), in line with our staff code of conduct.
- Where our monitoring approaches detect any immediate risk of harm or illegal activity, this will be reported as soon as possible to the appropriate agencies; including but not limited to, the emergency services via 999, [Kent Police](#) via 101, [NCA-CEOP](#) , LADO or [Kent Integrated Children's Services](#).

### **6.3 Information Security and Access Management**

Dover College is responsible for ensuring an appropriate level of security protection procedures are in place, in order to safeguard our systems as well as staff and learners. Further information can be found in acceptable use policies and online safety policy.

Dover College will review the effectiveness of these procedures periodically to keep up with evolving cyber-crime technologies.

Julie Green, a member of the senior leadership team and Paul Tapsell, governor, are responsible for ensuring that our school has met the DfE [cyber security standards](#) for schools and colleges.

### **6.4 Remote/Online learning**

Dover College will ensure any remote sharing of information, communication and use of online learning tools and systems will be in line with privacy and data protection requirements and any local/national guidance.

All communication with pupils and parents/carers will take place using school provided or approved communication channels; for example, school provided email accounts and phone numbers and agreed systems: Google Classroom or equivalent. Any pre-existing relationships or situations which mean this cannot be complied with will be discussed with the DSL.

Staff and pupils will engage with remote teaching and learning in line with existing behaviour principles as set out in our school behaviour policy/code of conduct and Acceptable Use Policies.

Staff and pupils will be encouraged to report issues experienced at home and concerns will be responded to in line with our child protection and other relevant policies.

When delivering remote learning, staff will follow our Remote Learning Acceptable Use Policy (AUP)

### **6.5 Online Safety Training for staff**

- Dover College will ensure that all staff receive online safety training, which, amongst other things, will include providing them with an understanding of the expectations, applicable roles and their responsibilities in relation to filtering and monitoring, as part of induction.
- Ongoing online safety training and updates for all staff will be integrated, aligned and considered as part of our overarching safeguarding approach. See section 7 for more information.

### **6.6 Educating Learners**

Dover College will ensure a comprehensive whole school curriculum response is in place to enable all learners to learn about and manage online risks effectively as part of providing a broad and balanced curriculum. See section 9 for more information.

### **6.7 Working with Parents/Carers**

Dover College will build a partnership approach to online safety and will support parents/carers to become aware and alert of the potential online benefits and risks for children by providing information on our school/college website and through existing communication channels (such as official social media, newsletters etc.)

- Dover College will ensure parents and carers understand what systems are used to filter and monitor their children's online use at school, what their children are being asked to do online and who from the school (if anyone) their child is going to be interacting with online. This is achieved by:
  - o providing information in relevant policies such as acceptable use and through existing communication channels.
- Where the School is made aware of any potentially harmful risks, challenges and/or hoaxes circulating online, national or locally, we will respond in line with the DfE 'Harmful online challenges and online hoaxes' guidance to ensure we adopt a proportional and helpful response.

## 7. Staff Engagement and Expectations

### 7.1 Awareness, Induction and Training

All members of staff have been provided with a copy of part one or annex A of 'Keeping Children Safe in Education' (2023) which covers safeguarding information for all staff.

- School leaders, including the DSL and governors will read KCSIE 2023 in its entirety.
  - School leaders and all members of staff who work directly with children will read annex B of KCSIE 2023.
  - All members of staff have signed to confirm that they have read and understood the national guidance shared with them. This is kept on My Concern in register form or by Sarah Moon, HR Manager
- It is a requirement that all members of staff have access to this policy and sign to say they have read and understood its contents. All staff are expected to re-read this policy at least annually (and following any updates) to ensure they understand our expectations and requirements.

All new staff and volunteers (including agency and third-party staff) receive safeguarding and child protection training (including online safety, which, amongst other things, will include ensuring an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring)) to ensure they are aware of the schools internal safeguarding processes as part of their induction. This will be achieved via specific induction training. The training is regularly updated and is in line with advice from the local safeguarding partners and explores the Kent processes to follow.

All governors receive appropriate safeguarding and child protection (including online safety) training at induction. This training equips them with the knowledge to provide strategic challenge to test and assure that our safeguarding policies and procedures are effective and support the delivery of a robust whole school approach to safeguarding. This training is regularly updated through annual updates.

All staff members (including agency and third-party staff) will receive appropriate safeguarding and child protection training (including online safety) that is updated at least annually, to ensure they are aware of a range of safeguarding issues and how to report concerns.. This training will take place during INSET.

Online safety training for staff will be integrated, aligned and considered as part of the whole school safeguarding approach and wider staff training and curriculum planning. Specific online safety training will take place annually.

In addition to specific child protection training, all staff will receive regular safeguarding and child protection updates (via email & staff meetings) at least annually, to provide them with relevant skills and knowledge to safeguard children effectively.

Dover College recognises the expertise staff build by undertaking safeguarding training and from managing safeguarding concerns on a daily basis and staff are encouraged to contribute to and shape school safeguarding arrangements and child protection policies via inviting input at staff training sessions.

The DSL and headteacher will provide an annual report to the governing body detailing safeguarding training undertaken by all staff and will maintain an up to date register of who has been trained.

## **7.2 Safer Working Practice**

Our school takes steps as outlined in this and other relevant policies to ensure processes are in place for staff that promote continuous vigilance, maintain an environment that deters and prevents abuse and challenges inappropriate behaviour.

All members of staff are required to work within our clear guidelines on safer working practice as outlined in the school code of conduct.

The DSL will ensure that all staff (including contractors) and volunteers are aware of the school expectations regarding safe and professional practice via the staff code of conduct and Acceptable Use Policy (AUP).

Staff will be made aware of the school behaviour management and physical intervention policies. Staff will manage behaviour effectively to ensure a good and safe educational environment and will have a clear understanding of the needs of all children. Any physical interventions and/or use of reasonable force must be in line with agreed policy and procedures and national guidance.

All staff will be made aware of the professional risks associated with the use of social media and electronic communication (such as email, mobile phones, texting, social networking). Staff will adhere to relevant school policies including staff code of conduct and Acceptable Use Policies.

## **7.3 Supervision and Support**

The induction process will include familiarisation with child protection responsibilities and procedures to be followed if members of staff have any concerns about a child's safety or welfare.

The school will ensure that members of staff who are working within the foundation stage are provided with appropriate supervision in accordance with the statutory requirements of Early Years Foundation Stage (EYFS) 2023.

The school will provide appropriate supervision and support for all members of staff to ensure that:

All staff are competent to carry out their responsibilities for safeguarding and promoting the welfare of children

All staff are supported by the DSL in their safeguarding role.

All members of staff have regular reviews of their own practice to ensure they improve over time.

Any member of staff affected by issues arising from concerns for children's welfare or safety can seek support from the DSL.

The DSL will also put staff in touch with outside agencies for professional support if they so wish. Staff can also approach organisations such as their Union, the Education Support Partnership or other similar organisations directly.

## **8. Safer Recruitment and Allegations**

### **8.1 Safer Recruitment and Safeguarding Checks**

Dover College is committed to ensure that we develop a safe culture and that all steps are taken to recruit staff and volunteers who are safe to work with our learners and staff.

Dover College will follow relevant guidance in Keeping Children Safe in Education 2023 (Part 3 'Safer Recruitment') and from The Disclosure and Barring Service (DBS)

The governing body and leadership team are responsible for ensuring that the school follows safe recruitment processes outlined within guidance.

The governing body will ensure that at least one of the persons who conducts an interview has completed safer recruitment training.

The school maintains an accurate Single Central Record (SCR) in line with statutory guidance.

Dover College is committed to supporting the statutory guidance from the Department for Education on the application of the Childcare (Disqualification) Regulations 2009 and related obligations under the Childcare Act 2006 in schools.

We advise all staff to disclose any reason that may affect their suitability to work with children including convictions, cautions, court orders, cautions, reprimands and warnings.

Where the school places a learner with an alternative provision provider, the school will continue to be responsible for the safeguarding of that child and will need to satisfy ourselves that the provider can meet the needs of the learner.

Dover College will obtain written confirmation from the alternative provision provider that appropriate safeguarding checks have been carried out on individuals working at the establishment, i.e. those checks that our school would otherwise perform in respect of our own staff.

Where the school organises work experience placements, we will follow the advice and guidance as identified in part Three of KCSIE 2023.

Where the school organises homestays as part of exchange visits, we will follow the advice and guidance as identified in part Three and Annex E of KCSIE 2023.

## **8.2 Allegations/concerns raised in relation to staff, including supply teachers, volunteers and contractors**

Any concerns or allegations about staff will be recorded and dealt with appropriately in line with Part four of KCSIE 2023 and the local Kent allegations arrangements. In depth information can be found within our staff code of conduct policy. This can be found on the staff intranet.

Any concerns or allegations about staff will be recorded and dealt with appropriately in line with national (Part four of KCSIE) and local guidance. Ensuring concerns are dealt with effectively will protect those working in or on behalf of the school from potential false allegations or misunderstandings.

Where the headteacher is unsure how to respond, for example if the school is unsure if a concern meet the harm 'thresholds', advice will be sought via the Local Authority Designated Officer (LADO) Enquiry Line and/or the Education Safeguarding Service.

In all cases where allegations are made against staff or low-level concerns are reported, once proceedings have been concluded, the headteachers (and if they have been involved the LADO) will consider the facts and determine whether any lessons can be learned and if any improvements can be made.

- In the situation that the school receives an allegation relating to an incident that happened when an individual or organisation was using our premises for the purposes of running activities for children (for example community groups, sports associations, or service providers that run extra-curricular activities), we will follow our safeguarding policies and procedures, including informing the LADO.

### **8.2.1 Concerns that meet the 'harm threshold'**

Dover College recognises that it is possible for any member of staff, including volunteers, governors, contractors, agency and third-party staff (including supply teachers) and visitors to behave in a way that indicates a person would pose a risk of harm if they continue to work in their present position, or in any capacity with children in a school or college. This includes when someone has

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

Allegations against staff which meet this threshold will be responded to and managed in line with part four of KCSIE. Allegations that meet the harm threshold will be referred immediately to the headteacher who will contact the LADO to agree further action to be taken in respect of the child and staff member. In the event of allegations of abuse being made against the headteacher, staff are advised that allegations should be reported to the chair of governors who will contact the LADO.

### **8.2.2 Concerns that do not meet the ‘harm threshold’**

Dover College may also need to take action in response to ‘low-level’ concerns about staff. Additional information regarding low-level concerns is contained with our staff code of conduct – this includes what a low-level concern is, the importance of sharing them and the confidential procedure to follow when sharing them.

Dover College has an open and transparent culture in which all concerns about all adults working in or on behalf of the school are dealt with promptly and appropriately; this enables us to identify inappropriate, problematic or concerning behaviour early, minimise the risk of abuse and ensure that adults working in or on behalf of the school are clear about and act within appropriate professional boundaries, and in accordance with our ethos and values.

A ‘low-level’ concern does not mean that it is insignificant; a low-level concern is any concern that an adult working in or on behalf of the school may have acted in a way that is inconsistent with our staff code of conduct, including inappropriate conduct outside of work and does not meet the ‘harm threshold’ or is otherwise not serious enough to consider a referral to the LADO.

Low-level concerns may arise in several ways and from a number of sources. For example, suspicion, complaints, or allegations made by a child, parent or other adult within or outside of the organisation, or as a result of vetting checks.

It is crucial that all low-level concerns are shared responsibly, recorded and dealt with appropriately to protect staff from becoming the subject of potential false low-level concerns or misunderstandings.

Low-level concerns should be shared confidentially in line with our staff code of conduct to the headteacher or Julie Green, DSL who will inform the headteacher according to the nature of each particular concern.

Where low-level concerns are reported to the school, the headteacher will be informed of all low level concerns and is the ultimate decision maker in respect of the response to all low-level concerns.

The headteacher will share concerns and liaise with the LADO enquiries officer via the [LADO Enquiry Line](#).

Low-level concerns shared about supply staff and contractors will be shared with their employers so any potential patterns of inappropriate behaviour can be identified.

If the school is in any doubt as to whether the information which has been shared about a member of staff as a low-level concern in fact meets the harm threshold, we will consult with the LADO.

Low-level concerns will be recorded in writing and reviewed so potential patterns of concerning, problematic or inappropriate behaviour can be identified.

Records will be kept confidential and will be held securely and retained and in compliance with the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR) and other relevant policies and procedures (for example data retention policies).

Where a pattern is identified, the school will implement appropriate action, for example consulting with [the LADO enquiry line](#) and following our disciplinary procedures.

### **8.2.3 Safe Culture**

As part of our approach to safeguarding, the School has created and embedded a culture of openness, trust and transparency in which our values and expected behaviour as set out in our staff code of conduct are constantly lived, monitored and reinforced by all staff (including supply teachers, volunteers and contractors) and where all concerns are dealt with promptly and appropriately.

Staff are encouraged and should feel confident to self-refer, if they have found themselves in a situation which could be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards. This includes where concerns may be felt to be deliberately



invented or malicious; such allegations are extremely rare and as such all concerns should be reported and recorded.

All staff and volunteers should feel able to raise any concerns about poor or unsafe practice and potential failures in the school safeguarding regime. The leadership team at Dover College will take all concerns or allegations received seriously.

All members of staff are made aware of the school Whistleblowing procedure (See Appendix 4). It is a disciplinary offence not to report concerns about the conduct of a colleague that could place a child at risk.

Staff can access the NSPCC whistleblowing helpline if they do not feel able to raise concerns regarding child protection failures internally. Staff can call 0800 028 0285 (8:00 AM to 8:00 PM Monday to Friday) or email [help@nspcc.org.uk](mailto:help@nspcc.org.uk).

Dover College has a legal duty to refer to the Disclosure and Barring Service (DBS) anyone who has harmed, or poses a risk of harm, to a child, or if there is reason to believe the member of staff has committed one of a number of listed offences, and who has been removed from working (paid or unpaid) in regulated activity or would have been removed had they not left. The DBS will consider whether to bar the person.

If these circumstances arise in relation to a member of staff at our school, a referral will be made as soon as possible after the resignation or removal of the individual in accordance with advice from the LADO and/or Sarah Moon, HR Manager.

## **9. Opportunities to teach safeguarding**

Dover College will ensure that children are taught about safeguarding, including online safety, as part of providing a broad and balanced curriculum. This will include covering relevant issues through Relationships Education (junior school)/Relationships and Sex Education (secondary school)

We recognise that school plays an essential role in helping children to understand and identify the parameters of what is appropriate child and adult behaviour, what is 'safe,' to recognise when they and others close to them are not safe, and how to seek advice and support when they are concerned. Our curriculum provides opportunities for increasing self-awareness, self-esteem, social and emotional understanding, assertiveness and decision making so that pupils have a range of age appropriate contacts and strategies to ensure their own protection and that of others.

Dover College recognises the crucial role we have to play in preventative education. Preventative education is most effective in the context of a whole-school approach which prepares pupils for life in modern Britain and creates a culture of zero tolerance for sexism, misogyny/misandry, homophobia, biphobic and sexual violence/harassment.

Dover College has a clear set of values and standards, upheld and demonstrated throughout all aspects of school life which are underpinned by our behaviour policy and pastoral support system, as well as by a planned programme of evidence-based RSE delivered in regularly timetabled lessons and reinforced throughout the whole curriculum. Our programme is fully inclusive and developed to be age and stage of development appropriate.

Dover College recognise that a one size fits all approach will not be appropriate for all children, and a more personalised or contextualised approach, tailored to the specific needs and vulnerabilities of individual children might be needed, for example children who are victims of abuse and children with SEND.

Our school systems support children to talk to a range of staff. All children will be listened to and heard, and their concerns will always be taken seriously and acted upon as appropriate.

## **10. Physical safety**

### **10.1 Use of reasonable force**

There may be circumstances when it is appropriate for staff to use reasonable force in order to safeguard children from harm. Further information regarding our approach and expectations can be found in Appendix 5 Physical Restraint of Pupils and is in line with the DfE [Use of reasonable force - GOV.UK](#) guidance.

### **10.2. The use of school premises by other organisations**

Where our school facilities or premises are rented/hired out to organisations or individuals (for example to community groups, sports associations, and service providers to run community or extra-curricular activities) we will ensure that appropriate arrangements are in place to keep children safe.

- o Where those services or activities are provided under the direct supervision or management of our school staff, our existing arrangements for child protection, including this policy, will apply.
- o Where services or activities are provided separately by another body using the school facilities/premises, the headteacher and governing body will seek assurance that the provider concerned has appropriate safeguarding and child protection policies and procedures in place (including inspecting these as needed); and ensure that there are arrangements in place for the provider to liaise with the school on these matters where appropriate. If this assurance is not achieved, an application to use premises will be refused.

Safeguarding requirements will be included in any transfer of control agreement (i.e. lease or hire agreement), as a condition of use and occupation of the premises. Failure to comply with this will lead to termination of the agreement.

### **10.3 Site Security**

All members of staff have a responsibility for maintaining awareness of buildings and grounds security and for reporting concerns that may come to light.

Appropriate checks will be undertaken in respect of visitors and volunteers coming into school as outlined within national guidance. Visitors will be expected to sign in and out via the office visitors log and to display a visitor's badge whilst on site.

Any individual who is not known or identifiable on site should be challenged for clarification and reassurance.

The school will not accept the behaviour of any individual (parent or other) that threatens school security or leads others (child or adult) to feel unsafe. Such behaviour will be treated as a serious concern and may result in a decision to refuse access for that individual to the school site.

## **11. Local Contacts**

All members of staff in Dover College are made aware of local support available.

### **Education Safeguarding Service**

South Kent Safeguarding Advisor: Gemma Willson (Monday/Tuesday) Claire Ledger (Wednesday/Thursday/Friday)

Telephone: 03000 423154

[Safeguarding Contacts | The Education People](#)

Contact details for Online Safety in the Education Safeguarding Service

03000 423164

Email: [onlinesafety@theeducationpeople.org](mailto:onlinesafety@theeducationpeople.org) (non-urgent issues only)

LADO Service

Telephone: 03000 410888

Email: [kentchildrenslado@kent.gov.uk](mailto:kentchildrenslado@kent.gov.uk)

Integrated Children's Services

Front door: 03000 411111

Out of Hours Number: 03000 419191

Early Help

Ashford - 03000 41 03 05 - [AshfordEarlyHelp@kent.gov.uk](mailto:AshfordEarlyHelp@kent.gov.uk)

Dover - 03000 42 29 98 - [DoverEarlyHelp@kent.gov.uk](mailto:DoverEarlyHelp@kent.gov.uk)

Folkestone and Hythe - 03000 41 10 08 - [ShepwayEarlyHelp@kent.gov.uk](mailto:ShepwayEarlyHelp@kent.gov.uk)

Kent Police

101 or 999 if there is an immediate risk of harm

Kent Safeguarding Children Multi-Agency Partnership (KSCMP)

[kscmp@kent.gov.uk](mailto:kscmp@kent.gov.uk)

[www.kscmp.org.uk](http://www.kscmp.org.uk)

03000 421126

Adult Safeguarding

Adult Social Care via 03000 41 61 61 (text relay 18001 03000 41 61 61) or email [social.services@kent.gov.uk](mailto:social.services@kent.gov.uk)

## Appendix 1: Categories of Abuse

**All staff should be aware that abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases multiple issues will overlap with one another.**

**Abuse:** a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others, for example the impact on children of all forms of domestic abuse. They may be abused by an adult or adults or another child or children. It should be noted that abuse can be carried out both on and offline and be perpetrated by men, women and children.

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

### **Signs that MAY INDICATE Sexual Abuse:**

- Sudden changes in behaviour and performance
- Displays of affection which are sexual and age inappropriate
- Self-harm, self-mutilation or attempts at suicide
- Alluding to secrets which they cannot reveal
- Tendency to cling or need constant reassurance
- Regression to younger behaviour for example thumb sucking, playing with discarded toys, acting like a baby
- Distrust of familiar adults e.g. anxiety of being left with relatives, a childminder or lodger
- Unexplained gifts or money
- Depression and withdrawal
- Fear of undressing for PE
- Sexually transmitted disease
- Fire setting

**Physical abuse:** a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

### **Signs that MAY INDICATE physical abuse:**

- Bruises and abrasions around the face
- Damage or injury around the mouth
- Bi-lateral injuries such as two bruised eyes
- Bruising to soft area of the face such as the cheeks
- Fingertip bruising to the front or back of torso
- Bite marks
- Burns or scalds (unusual patterns and spread of injuries)
- Deep contact burns such as cigarette burns
- Injuries suggesting beatings (strap marks, welts)
- Covering arms and legs even when hot
- Aggressive behaviour or severe temper outbursts.
- Injuries need to be accounted for. Inadequate, inconsistent or excessively plausible explanations or a delay in seeking treatment should signal concern.

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

### **Signs that MAY INDICATE emotional abuse:**

- Over reaction to mistakes
- Lack of self-confidence/esteem
- Sudden speech disorders
- Self-harming
- Eating Disorders
- Extremes of passivity and/or aggression
- Compulsive stealing
- Drug, alcohol, solvent abuse
- Fear of parents being contacted
- Unwillingness or inability to play
- Excessive need for approval, attention and affection

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

**Signs that MAY INDICATE neglect:**

- Constant hunger
- Poor personal hygiene
- Constant tiredness
- Inadequate clothing
- Frequent lateness or non-attendance
- Untreated medical problems
- Poor relationship with peers
- Compulsive stealing and scavenging
- Rocking, hair twisting and thumb sucking
- Running away
- Loss of weight or being constantly underweight
- Low self esteem

## Appendix 2: Support Organisations

Additional links can be found in KCSIE 2023 in Annex B and Part two.

### NSPCC 'Report Abuse in Education' Helpline

0800 136 663 or [help@nspcc.org.uk](mailto:help@nspcc.org.uk)

### National Organisations

- NSPCC: [www.nspcc.org.uk](http://www.nspcc.org.uk)
- Barnardo's: [www.barnardos.org.uk](http://www.barnardos.org.uk)
- Action for Children: [www.actionforchildren.org.uk](http://www.actionforchildren.org.uk)
- Children's Society: [www.childrenssociety.org.uk](http://www.childrenssociety.org.uk)
- Centre of Expertise on Child Sexual Abuse: [www.csacentre.org.uk](http://www.csacentre.org.uk)

### Support for staff

- Education Support Partnership: [www.educationsupportpartnership.org.uk](http://www.educationsupportpartnership.org.uk)
- Professional Online Safety Helpline: [www.saferinternet.org.uk/helpline](http://www.saferinternet.org.uk/helpline)
- Harmful Sexual Behaviour Support Service: <https://swgfl.org.uk/harmful-sexual-behaviour-support-service>

### Support for learners

- ChildLine: [www.childline.org.uk](http://www.childline.org.uk)
- Papyrus: [www.papyrus-uk.org](http://www.papyrus-uk.org)
- The Mix: [www.themix.org.uk](http://www.themix.org.uk)
- Shout: [www.giveusashout.org](http://www.giveusashout.org)
- Fearless: [www.fearless.org](http://www.fearless.org)
- Victim Support: [www.victimsupport.org.uk](http://www.victimsupport.org.uk)

### Support for adults

- Family Lives: [www.familylives.org.uk](http://www.familylives.org.uk)
- Crime Stoppers: [www.crimestoppers-uk.org](http://www.crimestoppers-uk.org)
- Victim Support: [www.victimsupport.org.uk](http://www.victimsupport.org.uk)
- The Samaritans: [www.samaritans.org](http://www.samaritans.org)
- NAPAC (National Association for People Abused in Childhood): [www.napac.org.uk](http://www.napac.org.uk)
- MOSAC: [www.mosac.org.uk](http://www.mosac.org.uk)
- Action Fraud: [www.actionfraud.police.uk](http://www.actionfraud.police.uk)
- Shout: [www.giveusashout.org](http://www.giveusashout.org)
- Advice now: [www.advicenow.org.uk](http://www.advicenow.org.uk)

### Support for Learning Disabilities

- Respond: [www.respond.org.uk](http://www.respond.org.uk)
- Mencap: [www.mencap.org.uk](http://www.mencap.org.uk)
- Council for Disabled Children: <https://councilfordisabledchildren.org.uk>



### **Contextual Safeguarding Network**

- <https://contextualsafeguarding.org.uk/>

### **Kent Resilience Hub**

- <https://kentresiliencehub.org.uk/>

### **Children with Family Members in Prison**

- National information Centre on Children of Offenders (NICCO): [www.nicco.org.uk/](http://www.nicco.org.uk/)

### **Substance Misuse**

- We are with you (formerly Addaction):  
[www.wearewithyou.org.uk/services/kent-for-young-people/](http://www.wearewithyou.org.uk/services/kent-for-young-people/)
- Talk to Frank: [www.talktofrank.com](http://www.talktofrank.com)

### **Domestic Abuse**

- Domestic abuse services: [www.domesticabuseservices.org.uk](http://www.domesticabuseservices.org.uk)
- Refuge: [www.refuge.org.uk](http://www.refuge.org.uk)
- Women's Aid: [www.womensaid.org.uk](http://www.womensaid.org.uk)
- Men's Advice Line: [www.mensadvice.org.uk](http://www.mensadvice.org.uk)
- Mankind: [www.mankindcounselling.org.uk](http://www.mankindcounselling.org.uk)
- National Domestic Abuse Helpline: [www.nationaldahelpline.org.uk](http://www.nationaldahelpline.org.uk)
- Respect Phonenumber: <https://respectphonenumber.org.uk>

### **Criminal and Sexual Exploitation**

- National Crime Agency: [www.nationalcrimeagency.gov.uk/who-we-are](http://www.nationalcrimeagency.gov.uk/who-we-are)
- It's not okay: [www.itsnotokay.co.uk](http://www.itsnotokay.co.uk)
- NWG Network: [www.nwgnetwork.org](http://www.nwgnetwork.org)
- County Lines Toolkit for Professionals:

[www.childrenssociety.org.uk/information/professionals/resources/county-lines-toolkit](http://www.childrenssociety.org.uk/information/professionals/resources/county-lines-toolkit)

- Multi-agency practice principles for responding to child exploitation and extra-familial harm: <https://tce.researchinpractice.org.uk/>

### **Honour Based Abuse**

- Karma Nirvana: <https://karmanirvana.org.uk>
- Forced Marriage Unit: [www.gov.uk/guidance/forced-marriage](http://www.gov.uk/guidance/forced-marriage)
- FGM Factsheet:

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/496415/6\\_1639\\_HO\\_SP\\_FGM\\_mandatory\\_reporting\\_Fact\\_sheet\\_Web.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/496415/6_1639_HO_SP_FGM_mandatory_reporting_Fact_sheet_Web.pdf)

- Mandatory reporting of female genital mutilation: procedural information:  
[www.gov.uk/government/publications/mandatory-reporting-of-female-genital-mutilation-procedural-information](http://www.gov.uk/government/publications/mandatory-reporting-of-female-genital-mutilation-procedural-information)

- The right to choose - government guidance on forced marriage:  
[www.gov.uk/government/publications/the-right-to-choose-government-guidance-on-forced-marriage](http://www.gov.uk/government/publications/the-right-to-choose-government-guidance-on-forced-marriage)

**Child on Child abuse, including bullying, sexual violence and harassment:**

- Rape Crisis: <https://rapecrisis.org.uk>
- Lucy Faithfull Foundation: [www.lucyfaithfull.org.uk](http://www.lucyfaithfull.org.uk)
- Brook: [www.brook.org.uk](http://www.brook.org.uk)
- Victim Support: [www.victimsupport.org.uk](http://www.victimsupport.org.uk)
- Anti-Bullying Alliance: [www.anti-bullyingalliance.org.uk](http://www.anti-bullyingalliance.org.uk)
- Disrespect Nobody: [www.disrespectnobody.co.uk](http://www.disrespectnobody.co.uk)
- Upskirting – know your rights:  
[www.gov.uk/government/news/upskirting-know-your-rights](http://www.gov.uk/government/news/upskirting-know-your-rights)
- Stop it Now! [www.stopitnow.org.uk](http://www.stopitnow.org.uk)
- Parents Protect: [www.parentsprotect.co.uk](http://www.parentsprotect.co.uk)
- Diana Award: [www.antibullyingpro.com](http://www.antibullyingpro.com)
- Bullying UK: [www.bullying.co.uk](http://www.bullying.co.uk)
- Kidscape: [www.kidscape.org.uk](http://www.kidscape.org.uk)
- Centre of expertise on Child Sexual Abuse: [www.csacentre.org.uk](http://www.csacentre.org.uk)

## **Mental Health**

- Mind: [www.mind.org.uk](http://www.mind.org.uk)
- Moodspark: <https://moodspark.org.uk>
- Young Minds: [www.youngminds.org.uk](http://www.youngminds.org.uk)
- We are with you (formerly Addaction):  
[www.wearewithyou.org.uk/services/kent-for-young-people/](http://www.wearewithyou.org.uk/services/kent-for-young-people/)
- Anna Freud: [www.annafreud.org/schools-and-colleges/](http://www.annafreud.org/schools-and-colleges/)

## **Online Safety**

- NCA-CEOP: [www.ceop.police.uk](http://www.ceop.police.uk) and [www.thinkuknow.co.uk](http://www.thinkuknow.co.uk)
- Internet Watch Foundation (IWF): [www.iwf.org.uk](http://www.iwf.org.uk)
- Childnet: [www.childnet.com](http://www.childnet.com)
- UK Safer Internet Centre: [www.saferinternet.org.uk](http://www.saferinternet.org.uk)
- Report Harmful Content: <https://reportharmfulcontent.com>
- Marie Collins Foundation: [www.mariecollinsfoundation.org.uk](http://www.mariecollinsfoundation.org.uk)
- Internet Matters: [www.internetmatters.org](http://www.internetmatters.org)
- NSPCC: [www.nspcc.org.uk/onlinesafety](http://www.nspcc.org.uk/onlinesafety)
- Get safe Online: [www.getsafeonline.org](http://www.getsafeonline.org)
- Parents Protect: [www.parentsprotect.co.uk](http://www.parentsprotect.co.uk)
- Cyber Choices:  
<https://nationalcrimeagency.gov.uk/what-we-do/crime-threats/cyber-crime/cyberchoices>
- National Cyber Security Centre (NCSC): [www.ncsc.gov.uk](http://www.ncsc.gov.uk)

## **Radicalisation and hate**

- Educate against Hate: [www.educateagainsthate.com](http://www.educateagainsthate.com)
- Counter Terrorism Internet Referral Unit: [www.gov.uk/report-terrorism](http://www.gov.uk/report-terrorism)
- True Vision: [www.report-it.org.uk](http://www.report-it.org.uk)

## **Appendix 3: Use of Mobile Phones and Digital Photography Policy in EYFS**

### **Policy Statement**

Children have their photographs taken to provide evidence of their achievements for developmental records (The Early Years Foundation Stage, EYFS 2012) and for marketing. All staff, visitors, volunteers and pupils are not permitted to use their own mobile phones, or other electronic devices with imaging and sharing capabilities, to take or record any images of pre-school children for their own records during session times.

### **Procedures**

Under the Data Protection Act 1998, the pre-school must seek parental consent to take photographs and use video recorders, or other electronic devices with imaging and sharing capabilities. Photographs will be stored on the pre-school laptops and computers, which is password protected, until the pre-college ceases to operate, should this occur then all photographs will be shredded or deleted from the pre-school laptops and computers.

The pre-school's digital camera/s, memory cards or other electronic devices with imaging and sharing capabilities must not leave the pre-school setting, except for EYFS outings. Photos are printed in the setting by staff and images are then removed from the camera's memory.

Photographs may be taken during indoor and outdoor play and may be displayed and used in a child's 'Learning Journey', as part of the child's developmental records for children and parent/carers to share and make contributions. The 'Learning Journey' becomes the property of the Parent/carer at the end of the child's time in the setting.

Often photographs may contain other children in the background.

Events such as sports day, outings, Christmas and fundraising events may be recorded by video, or other electronic devices with imaging and sharing capabilities, and photographs by staff and parent/carers but always in full view of all attending.

On occasion, we might like to use photographs of the children taking part in an activity to advertise/promote our Early Learners via the Dover College Website; parental permission is sought through Admissions on entry to Dover College.

- Personal mobile phones, other electronic devices with imaging and sharing capabilities, belonging to the EYFS staff are not to be used throughout contact time with the children and are locked away.
- EYFS Staff are not permitted to use recording equipment on their personal mobile phones, other electronic devices with imaging and sharing capabilities, to take photos or videos of EYFS children.
- During outings nominated staff will be permitted to have access to their own mobile phones, or other electronic devices with imaging and sharing capabilities, which are to be used for emergency contact only.

- All cameras and mobile phones and other electronic devices with imaging and sharing capabilities are prohibited in the toilet and nappy changing area.

## Appendix 4: Whistleblowing

### Scope

This procedure is separate from the College's procedures regarding grievances. Individuals should not use the whistleblowing procedure to raise grievances about their personal employment situation. There are also existing procedures in place (The Complaints Procedure) to enable pupils, staff, parents and stakeholders to make complaints and raise concerns about individual and particular matters.

The whistleblowing procedure is intended to cover concerns that fall outside the scope of individual complaints and concerns. It provides members of staff with a route to raise concerns internally and in a confidential fashion about malpractice. Concerns can be raised with:

Role	Name	Contact information
Designated Safeguarding Lead (DSL)	Julie Green	M: 07743 807491 E: greenj@dovercollege.org.uk
Deputy Designated Safeguarding Leads (DDSLs)	Tracey Mills	M: 07800 743725 E: millst@dovercollege.org
	Laurence Teeling	M: 07701 334720 E: teelingl@dovercollege.org.uk
	Audrey Turner-Dauncey	M: 07802 621425 E: turnerdaunceya@dovercollege.org.uk
Headmaster	Simon Fisher	M: 07793 444714 E: fishers@dovercollege.org.uk
Safeguarding Governor	Paul Tapsell	M: 07947 016697
NSPCC Whistleblowing Advice Line		0800 0280 285

Malpractice is not easily defined and it includes but is not restricted to;

- fraud, financial irregularities
- bribery
- dishonesty
- malpractice
- ignoring serious risks to health, safety or the environment
- criminal offences or activities
- miscarriages of justice
- failure to comply with legal obligations

- inappropriate behaviour
- unethical conduct
- any behaviour which is at odds with the policies of Dover College or seems likely to harm somebody or the environment
- any behaviour which represents a cover-up of these sorts of issues

The policy also provides, if necessary, for such concerns to be raised outside the organisation.

### **Principles**

In accordance with Lord Nolan's Second Report of the Committee on Standards in Public Life, the College's policy on whistleblowing is intended to demonstrate that the College :-

- Will not tolerate malpractice;
- Respects the confidentiality of staff raising concerns and will provide procedures to maintain confidentiality so far as is consistent with progressing the issues effectively;
- Will provide the opportunity to raise concerns outside of the normal line management structure where this is appropriate;
- Will invoke the College's Disciplinary Policy and procedure in the case of false, malicious, vexatious or frivolous allegations;
- Will provide a clear and simple procedure for raising concerns, which is accessible to all members of staff.

### **Safeguards**

#### **3.1 Protection from reprisal, harassment or victimisation**

Dover College recognises that the decision to report a concern can be a difficult one to make, not least because of the fear of reprisals from those responsible or close to the alleged malpractice. No member of staff will suffer a detriment or be disciplined for raising a genuine and legitimate concern, providing that they do so in good faith and following the Whistleblowing procedures.

#### **3.2 Confidentiality**

Dover College will protect the identity of individuals who raise concerns and do not want their name to be disclosed to the alleged perpetrator of malpractice without their prior approval. It must be appreciated, however, that the investigation may reveal the source of the information, and statements made by the individuals who raised the issue may be required as part of the evidence. The College encourages individuals to put their name to allegations made. Concerns expressed anonymously are much less powerful, but they will be considered at the discretion of the College. In exercising this discretion, the factors to be taken account of will include:

- the seriousness of the issue raised;
- the credibility of the concern;
- the likelihood of confirming the allegation from attributable sources

#### **3.3 Untrue allegations**

If an allegation is made in good faith, but is not confirmed by the investigation, no action will be taken against the individual. However, if individuals make allegations that are malicious or vexatious, disciplinary action is likely.

#### **4. How to Raise A Concern**

The sooner individuals express their concern the easier it is to take action.

As a first step;

- A pupil should normally raise concerns with their HSMs or with the Deputy Head; in a certain situation it could be raised with the Headmaster. This depends, however, on the seriousness and sensitivity of the issues involved and who is thought to be involved in the malpractice. Pupils who feel that they cannot approach management in the College should approach the College's Independent Listener.
- An employee should normally raise concerns with the Senior School Deputy Head, the Prep School Deputy Head or the Director of Finance and Operations as appropriate; in some situations, it could be raised with the Headmaster. This depends, however, on the seriousness and sensitivity of the issues involved and who is thought to be involved in the malpractice. Employees who feel that they cannot approach management in the College should approach either the Chairman of Council of Governors or another member of Council.
- Concerns are better raised in writing and should set out the background and history of the concern, giving names, dates and places where possible, and the reason why the employee is concerned about the situation.
- An individual who does not feel able to put their concerns in writing can telephone or meet the appropriate person.
- Individuals may invite a friend (trade union official or association representative, if relevant) to raise the matter in conjunction with them.

#### **How will the College respond?**

Any concern raised will be investigated thoroughly and in a timely manner, and appropriate corrective action will be pursued. The person raising the concern will be kept informed of progress and whenever possible (subject to third party rights and legal or contractual restraints), will be informed of the resolution.

Within two weeks of a concern being received, the Headmaster or appropriate member of College staff will write to the individual who raised the issue:

- acknowledging that the concern has been raised
- indicating how it is proposed that the matter be dealt with
- where possible, giving an estimate of how long it will take to provide a final response
- telling the individual whether further investigations will take place and if not, why not

The action taken by the College will depend on the nature of the concern. The matters raised may for example:

- be resolved by agreed action without the need for investigation.



- be investigated internally;
- be referred to external agencies.

The amount of contact between the investigators considering the issue and the individual who has raised the issue will depend on the nature of the matters raised, the potential difficulties involved and the clarity of the information provided. If necessary, further information will be sought from the individual.

When any meeting is arranged with the individual, they will be given the right to be accompanied by a friend or fellow worker who is not involved in the incident to which the concern relates.

A member of staff who is not satisfied that their concern is being properly dealt with will have a right to raise it in confidence with the Council of Governors.

## **5. External Procedures**

It is hoped that there will be a satisfactory outcome to any investigations or action taken. Where all internal procedures have been exhausted or where an individual is not satisfied, a person shall have a right of access to an external person/body.

### **5.1 Taking the issue further - pupils:**

- The College's Independent Listener – Mrs Jo Irwin or Mr Chris Scoble
- The College Council of Governors

### **5.2 Taking the issue further – employees**

- relevant professional bodies or regulatory organisations (this may include (depending on the subject matter of the disclosure), the Health and Safety Executive and/or the Local Authority Designated Officer (where the disclosure relates to a child protection issue), the Information Commissioner's Office)
- Dover College Council of Governors
- the Police
- the charity: Protect (telephone 020 3117 2520)

### **5.3 To be considered if taking the matter outside of Dover College**

- The person must make sure that they do not disclose otherwise confidential information.
- Staff must in no circumstances take matters directly to the press in any form, and this action will be seen as a serious disciplinary matter.

## **6. Going directly outside of Dover College**

It should be noted that under the Public Interest Disclosure Act 1998, there are circumstances where a member of staff may be entitled to raise a concern directly with an external body where the individual reasonably believes:

- That exceptionally serious circumstances justify it;

- That the College would conceal or destroy the relevant evidence;
- Where they believe they would be victimised by the College;
- Where the Secretary of State has ordered it.

**Implementation**

The Council of Governors and the SLT has overall responsibility for the maintenance and operation of this policy. A record of concerns raised and the outcomes will be reported as necessary to the Governing Body.

## **Appendix 5 : Physical Restraint of Pupils**

Physical Restraint should be limited to emergencies and used only as a last resort. Under the Children Order 1995, it is only permissible as described under the heading "Physical Control". Article 4 of the Education Order 1998 clarifies powers that already exist in common law. It enables teachers and other members of staff in the school, authorised by the Headteacher, to use such force as is reasonable in the circumstances, to prevent a learner from:

- Committing an offence
- Causing personal injury to a person or damage to the property of any person.
- Engaging in any behaviour prejudicial to the maintenance of good order and discipline at the school or among its pupils, whether during a teaching session or otherwise.

### **Definition of restraint at Dover College**

Physical restraint is the positive application of force with the intention of protecting the child from harming himself or others or seriously damaging property.

### **General policy aims**

The Dover College staffing team recognise that the use of reasonable force is only one of the last in a range of strategies available to secure pupil safety and well-being and to maintain good order and discipline. Our policy on restraint should therefore be read in conjunction with our Behaviour Policy and Safeguarding policies.

Specific aims of the restraint policy:

- To protect every person in the school community from harm
- To protect all learners against any form of physical intervention that is unnecessary, inappropriate, excessive or harmful
- To provide adequate information and training for staff so that they are clear as to what constitutes appropriate behaviour and to deal effectively with violent or potentially violent situations

### **Why use restraint?**

Physical restraint should avert danger by preventing or deflecting a child's action or perhaps by removing a physical object, which could be used to harm him / herself or others. It is only likely to be needed if a child appears to be unable to exercise self-control of emotions and behaviour. It is not possible to define every circumstance in which physical restraint would be necessary or appropriate and staff will have to exercise their own judgement in situations, which arise within the above categories.

All staff should always act within the School's policy on behaviour and discipline, particularly in dealing with disruptive behaviour. Staff should be aware that when they are in charge of children during the school day, or during other supervised activities, they are acting in loco parentis and should, therefore, take reasonable action to ensure pupils' safety and well-being.

Failure to physically restrain a learner who is subsequently injured or injures another, could, in certain circumstances, lead to an accusation of negligence. At the same time, staff are not expected to place themselves in situations where they are likely to suffer injury because of their intervention.

### **Alternative strategies**

There are some situations in which the need for physical restraint is immediate and where there are no equally effective alternatives (e.g. When a learner is about to run across a road). However, in many circumstances there are alternatives e.g. the use of assertiveness skills such as:

- the broken record in which an instruction is repeated until the learner complies
- use of a distracter, such as a loud whistle, to interrupt the behaviour (such as a fight) long enough for other methods of verbal control to be effective
- withdrawal of attention (audience) e.g. if an action such as damage to property is threatened
- other techniques designed to defuse the situation, such as the avoidance of confrontation, or use of humour (in these cases the incident can be dealt with later when emotions are no longer running high)
- the employment of other sanctions consistent with the School's policy on behaviour.

### **Use of physical restraint**

Physical restraint should be applied as an act of care and control with the intention of re-establishing verbal control as soon as possible and, at the same time, allowing the pupil to regain self-control. It should never take a form, which could be seen as a punishment.

Staff are only authorised to use reasonable force in applying physical restraint, although there is no absolute definition of this, as what constitutes reasonable force depends upon the particular situation and the learner to whom it is being applied. However, as a general rule, only the force necessary to stop or prevent the behaviour should be used, in accordance with the guidelines below.

There are some forms of physical intervention, which may involve minimal physical contact, such as blocking a learner's path or the staff member physically interposing him or herself between the learner and another learner or object. However, in some circumstances, direct physical contact may be necessary. In all circumstances other methods should be used if appropriate and effective physical restraint should be a last resort.

When physical restraint becomes necessary:

DO

- Tell the learner what you are doing and why
- Use the minimum force necessary
- Involve another member of staff if possible
- Tell the learner what s/he must do for you to remove the restraint (this may need frequent repetition)

- Use simple and clear language
- Hold limbs above a major joint if possible e.g. above the elbow
- Relax your restraint in response to the learner's compliance

#### DON'T

- Involve yourself in a prolonged verbal exchange with the learner
- Attempt to reason with the learner
- Involve other learners in the restraint
- Touch or hold the learner in sexual areas
- Twist or force limbs back against a joint
- Bend fingers or pull hair
- Hold the pupil in a way which will restrict blood flow or breathing e.g. around the neck, slap, punch, kick or trip up the pupil
- Act in temper (involve another staff member if you fear loss of control)

#### **Actions after an incident**

Physical restraint often occurs in response to highly charged emotional situations and there is a clear need for debriefing after the incident, both for the staff involved and the learner. A member of the leadership team should be informed verbally of any incident as soon as possible and all interventions should be recorded on My Concern .

The senior leadership team will take responsibility for making arrangements for debriefing once the situation has stabilised. An appropriate member of the teaching staff should always be involved in debriefing the pupil involved and any victims of the incident should be offered support, and their parents/HSMs informed.

If the behaviour is part of an ongoing pattern it may be necessary to address the situation through the development of a behaviour plan, which may include an anger management programme, or other strategies agreed by the Head of Individual Needs. Any behaviour plan should always be discussed and agreed with the parent/HSM.

It is also helpful to consider the circumstances precipitating the incident to explore ways in which future incidents can be avoided. All incidents should be recorded on My Concern immediately. All sections of this report should be completed so that in the event of any future complaint a full record is available.

A member of the leadership team will contact parents as soon as possible after an incident, normally on the same day, to inform them of the actions that were taken and why, and to provide them with an opportunity to discuss it.

## **Risk Assessments**

If we become aware that a learner is likely to behave in a disruptive way that may require the use of reasonable force, we will plan how to respond if the situation arises. Such planning will address:

- Management of the pupil (e.g. reactive strategies to de-escalate a conflict)
- Involvement of parents/HSMs to ensure that they are clear about the specific action the school might need to take
- Briefing of staff to ensure they know exactly what action they should be taking (this may identify a need for training or guidance)
- Identification of additional support that can be summoned if appropriate

## **Complaints**

A clear restraint policy, adhered to by all staff and shared with parents, should help to avoid complaints from parents. It is unlikely to prevent all complaints, however, and a dispute about the use of force by a member of staff might lead to an investigation, either under disciplinary procedures or by the Police and social services department under child protection procedures. It is our intention to inform all staff, learners, parents and governors about these procedures and the context in which they apply.

## **When might it be appropriate to use reasonable force?**

Examples of situations that may require restraint are when:

- a learner attacks a member of staff, or another pupil
- learners fighting
- a learner is causing, or at risk of causing, injury or damage by accident, by rough play, or by misuse of dangerous materials, substances or objects
- a learner is running in a corridor or on a stairway in a way in which he/she might have or cause an accident likely to injure her/himself or others
- a learner absconding from a class or trying to leave school (NB this will only apply if a learner could be at risk if not kept in the classroom or at school)
- a learner persistently refuses to obey an order to leave an area
- a learner behaves in such a way that seriously disrupts a lesson.

## **Appendix 6: Relationships between Pupils**

### **Introduction**

The aim of this policy is to give guidance about the appropriateness of relationships and behaviour between pupils at Dover College.

The school encourages its pupils to treat each other with respect and to value friendships. Whilst it is mindful of contemporary attitudes, it upholds the view that sexual relationships should be within consensual, committed, adult relationships, even when pupils are aged 16 or over. The school strives to extend the same human rights of equality and fairness to all of its pupils regardless of gender or sexual orientation whilst maintaining appropriate safeguarding measures in a boarding environment.

### **Relationships**

The school is aware of the challenges that deepening friendships may bring to young people and therefore it sets certain boundaries that must be maintained, irrespective of sexual orientation. These are informed by the school's ethos and dictated by both its pastoral and its legal responsibilities.

Public displays of affection are not appropriate and pupils must remain especially mindful of this in the environment of their boarding houses, in school buildings, in all other areas of the school grounds, in the local vicinity or when on school trips.

### **Safeguarding measures in a boarding environment**

Relationships, beyond friendships, are generally inappropriate when there is a significant age difference between those concerned. Houseparents will talk to pupils and may inform parents where they have concerns about a relationship.

It is expected that all pupils using communal shower facilities will respect the privacy of any other pupil using the same facility. All forms of electronic communication or recording devices are banned from all of the school's washing facilities or from being used in changing facilities. Any breach of the above or any other inappropriate behaviour will be considered a disciplinary matter.

Sexual relationships or sexualised behaviour between pupils at Dover College are always deemed inappropriate; in some cases such relationships may also be illegal. Sexualised behaviour in other contexts, such as sexting (also known as youth produced sexual imagery), will also be treated as a very serious matter and may be considered as child-on-child abuse. The school expects all members of its community to respect the wishes and feelings of others; any unwanted attention or breach of a pupil's privacy will not be condoned.

## **Consequences of inappropriate behaviour**

Students in breach of this policy are likely to be subject to disciplinary action under the school's Behaviour policy. If a pupil is believed to have taken part in inappropriate sexual activity, the Headteacher will be informed immediately and parents will be informed at the earliest opportunity. Every incident could lead to removal from the school. .

Incidents that raise child protection or other legal concerns will be treated in accordance with the school's Safeguarding and Child Protection policies and may have to be referred to Kent Safeguarding Children Multi-Agency Partnership or to the Police.

## **Support**

The school is committed to the health and safety of its community and will take action to safeguard the wellbeing of its pupils. The school is also committed to widening pupils' understanding about related health and social issues including STDs. A programme of education about both appropriate sexual relationships and sexual health takes place through the school's PSHE programme.

The school acknowledges the importance of its pastoral role in the welfare of young people and, through the general ethos of the school, will seek to persuade any pupil in need of support to come forward.