

2023/24 Child Protection and Safeguarding Policy for Leiths School of Food and Wine

Consistent with Keeping Children Safe in Education 2023

PERSONS RESPONSIBLE FOR THIS POLICY	Jenny Stringer (DSL) Hannah MacLennan (DEPUTY DSL) Michael Cropp (DEPUTY DSL) Jenny Stinger (PRINCIPAL) Caroline Waldegrave (BOARD REPRESENTATIVE)
--	---

Reviewed	January 2024
Next Review Date	September 2024
Lead for Review	Designated Safeguarding Lead

Contents

KEY CONTACTS	2
1. INTRODUCTION.....	5
2. THE LEGAL FRAMEWORK	5
3. ROLES AND RESPONSIBILITIES.....	6
4. SUPPORTING STUDENTS	7
5. DEALING WITH A DISCLOSURE AND RECORD KEEPING	8
6. THE ROLE OF AN APPROPRIATE ADULT IN SAFEGUARDING.....	10
7. INFORMATION SHARING	10
8. MULTI AGENCY WORKING	10
9. SAFER RECRUITMENT.....	11
10. TRAINING	11
11. WHISTLEBLOWING IN A SAFEGUARDING CONTEXT	12
12. SITE SECURITY	14
13. QUALITY ASSURANCE.....	14
14. POLICY REVIEW	14
APPENDIX A:	14
The role of the Designated Safeguarding Lead	14
Managing referrals:.....	14
Record keeping:	14
Multi-agency working and information sharing:	15
Training:	15
Awareness raising:	16
APPENDIX B:.....	17
Safeguarding Procedures	17
Definitions:.....	17
Categories of Abuse:.....	18
Mental Health:	20
APPENDIX C:.....	21
Further information	21
Female Genital Mutilation	21
Fabricated or Induced Illness / Perplexing Presentation	22
Gang and Youth / Serious Violence.....	23
Faith Based Abuse.....	23
Risk of Trafficking	23

Risks Associated with Parent/Carer Mental Health	24
Drugs and Alcohol.....	25
(So-called) Honour-Based Violence and Forced Marriages	25
Managing Allegations Against Staff	26
Preventing Radicalisation.....	27
Child Missing From Education.....	29
Child Sexual Exploitation & Child Criminal Exploitation	29
Child Sexual Exploitation (CSE)	30
Child Criminal Exploitation (CCE).....	30
Sexual harassment, violence, harmful sexual behaviours	31
Upskirting.....	32
Consent.....	32
Digital Safety & Remote Learning	33
Filters and monitoring	33
APPENDIX D	35
Safer Recruitment and the Single Central Record	35
Pre-Appointment Checks and Safer Recruitment.....	35
Single Central Record (SCR)	35

KEY CONTACTS

Key Personnel	Name (s)	Contact details
Principal	Jenny Stringer	Jenny.stringer@leiths.com
Designated Safeguarding Lead (DSL)	Jenny Stringer	Jenny.stringer@leiths.com
Deputy DSLs	Michael Cropp Hannah Maclennan	Michael.cropp@leiths.com Hannah.maclennan@leiths.com
Leiths' named 'Prevent' lead	Jenny Stringer	Jenny.stringer@leiths.com
Nominated Safeguarding Director	Caroline Waldegrave	On request from Reception

Mental Health First Aiders	Ben Blackburn Louise Kissane Caz Firth-Jones	ben.blackburn@leiths.com Louise.Kissane@leiths.com Caroline.Firth-Jones@leiths.com
Local Authority Designated Officer (LADO)	Megan Brown - Safer Organisations (LADO) and Safeguarding in Education Manager	07776 673020 megan.brown@lbhf.gov.uk (not monitored when LADO is away) Referrals LADO@lbhf.gov.uk (monitored Mon to Fri, 9am to 5pm) OR telephone: duty admin: 020 8753 5125 (answered Mon to Fri, 9am to 5pm)
Initial Consultation and Advice Team (ICAT)	ICAT	020 8753 6600 familyservices@lbhf.gov.uk Out of hours service: 020 8748 8588
Multi Agency Safeguarding Hub (MASH)	The MASH Service can be contacted via ICAT	020 8753 660 familyservices@lbhf.gov.uk Out of hours service: 020 8748 8588
Police		101 or in emergencies 999
Child and Adolescent Mental Health Service (NHS) CAMHS	CAMHS Speak Helpline A service for children and young people under 18 and who live in Hammersmith and Fulham, Ealing or Hounslow and are in need help and support. The aim is to offer telephone support via a helpline number, which includes basic counselling and problem-solving to young people and their families. The helpline is run by healthcare professionals who are familiar with local services and have a range of specialist knowledge, to help support and advise young people and their families.	0800 328 4444
NSPCC Helpline	If you are worried about a child, even if you are unsure, you can call the NSPCC helpline	0808 800 5000 or email help@nspcc.org.uk

	<p>If you are concerned about a young person being involved in knife crime or other criminal activities, please see:</p>	<p>Community Safety Unit 020 8753 2816 csu@lbhf.gov.uk</p> <p>Anti-social Behaviour Unit 020 8753 2693 asbu@lbhf.gov.uk</p>
--	---	--

Leiths School of Food and Wine (Leiths) recognises its responsibility for safeguarding and child protection.

1. INTRODUCTION

- 1.1. It is essential that everybody working in a school or college understands their safeguarding responsibilities. Everyone who comes into contact with children and families has a role to play in ensuring children and young people are safe from abuse, neglect exploitation and harm. Leiths School of Food and Wine (Leiths) is committed to safeguarding children and aims to create a culture of vigilance. All staff should make sure that any decisions made are in the best interests of the child.
- 1.2. At Leiths the majority of students are aged 18 or above. We acknowledge our duty of care towards **all** students whilst recognising that for the purposes of Child Protection a child is defined as being aged under 18. (see Appendix B) The referral services for students aged 18 or over are sign-posted to them whilst for students aged under 18, referral services are provided by Hammersmith and Fulham Safeguarding Partnership Arrangements.
- 1.3. This policy provides the basis for good practice within the school for safeguarding work. It should be read in conjunction with the main Hammersmith and Fulham safeguarding policies and procedures available here: [London Child Protection](#) plus the safeguarding appendix document. These are in keeping with relevant national procedures and reflect what is considered to be safe and professional practice in this context.
- 1.4. This policy applies to all members of staff in our school, including all permanent, temporary and support staff, directors, volunteers, contractors and external service or activity providers.

2. THE LEGAL FRAMEWORK

This policy and the accompanying procedure have been developed in accordance with the following statutory guidance and local safeguarding procedures:

Working Together to Safeguard Children: A Guide to Inter-Agency Working to Safeguard and Promote the Welfare of Children, December 2023:

https://assets.publishing.service.gov.uk/media/65803fe31c0c2a000d18cf40/Working_together_to_safeguard_children_2023_-_statutory_guidance.pdf

Keeping Children Safe in Education: Statutory Guidance for Schools and Colleges, September 2023

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1181955/Keeping_children_safe_in_education_2023.pdf

Prevent Duty Guidance 2023

https://assets.publishing.service.gov.uk/media/64f8498efdc5d10014fce6d1/14.258_HO_Pr_event_Duty_Guidance_v5c.pdf

3. ROLES AND RESPONSIBILITIES

Leiths' Designated Safeguarding Lead (DSL) with overall designated responsibility for safeguarding is **Jenny Stringer**. We have two Deputy Designated Safeguarding Leads (**Hannah MacLennan** and **Michael Cropp**) to ensure there is always appropriate cover for this role. The responsibilities of all Designated Safeguarding Lead are described in detail in Appendix A.

Leiths' Safeguarding Committee is comprised of the DSL and DDSLs. The Safeguarding Committee meets on a weekly basis during term-time to discuss and monitor any safeguarding and pastoral matters, including low-level concerns about students. A log of any low-level concerns about staff is also reviewed and updated at these weekly meetings. (See Policy on Low-Level Concerns about Staff.)

The **Board of Directors** acknowledge their collective responsibility for ensuring that safeguarding arrangements are fully embedded within the school's ethos and reflected in the school's day-to-day practice.

All directors review and approve Leiths' Safeguarding Policy, the Staff Code of Conduct and Student Handbook annually. They review and approve Leiths' annual Section 11 safeguarding audit which is submitted to Hammersmith and Fulham's Safeguarding Children Board by the deadline in December to meet the needs of Section 11 of the Children Act (2004). The Board of Directors review Leiths' anonymised safeguarding log and monitors trends. 'Lessons learnt' are discussed with the Board of Directors during the annual review, usually in July, at which the DSL reports formally to the Board on safeguarding matters. An earlier report is instigated if there is any serious safeguarding matter.

All directors monitor the effectiveness of safeguarding measures in place on their visits to the college. This includes ensuring that unauthorised people do not have access to any of the college properties and that all properties are safe and secure.

The director appointed by the Board to represent them with regard to safeguarding, **Caroline Waldegrave** meets with the Designated Safeguarding Lead each term to discuss the following: any serious behavioural issues (including any incidences of racism, homophobia, misogyny), any bullying and radicalisation incidences, safeguarding cases and any referrals to MASH or the police. Online safety is also discussed at these meetings, including Filtering and Monitoring, so as to be alert to and respond to new developments in this area. The DSL spot-checks a selection of staff files each term to ensure Leiths follows safer recruitment practices and formally conveys any concerns about the SCR at this meeting.

The director with responsibility for safeguarding is informed promptly if there are any serious safeguarding matters. She is also informed if any contact with an external agency is made due to a safeguarding concern, ensuring confidentiality as far as possible.

All staff members, directors, volunteers, and external providers know how to recognise signs and symptoms of abuse, how to respond to students who disclose abuse and what to do if they are concerned about a child.

Leiths acknowledges the need to treat everyone equally, with fairness, dignity, and respect. Any discriminatory behaviours are challenged, and those involved are supported to understand how to treat others with respect.

Our school and Board take all reasonable action to limit children's exposure to risks from the school's IT system and ensure Leiths has appropriate filters and monitoring systems in place and regularly review their effectiveness.

4. SUPPORTING STUDENTS

Leiths will support all students by:

- ensuring that students are taught how to get help when they need it, including how to share a concern or make a referral.
- keeping abreast of changes in online risks, enabling children and parents to learn about the risks of new technologies and social media and teaching students how to use these responsibly.
- encouraging students to talk about feelings and deal assertively with pressures.
- ensuring students are listened to. providing them with a range of appropriate staff and sign-posting relevant external services to approach as needed.
- supporting students to feel safe, develop confidence and independence and increase the development of self-esteem and self-assertiveness while not condoning aggression or bullying; (The anti-bullying policy can be found in the Staff Code of Conduct and on the website).
- liaising and working together with other support services and those agencies involved in safeguarding children, including domestic abuse including Early Help and preventative services
<https://www.gov.uk/government/consultations/domestichttps://www.gov.uk/government/consultations/human-rights-act-reform-a-modern-bill-of-rights/outcome/human->

[rights-act-reform-a-modern-bill-of-rights-consultation-responseabuse-act-statutory-guidance](#)

<https://www.gov.uk/government/publications/promoting-children-and-youngmailto:asbu@lbhf.gov.ukpeoples-emotional-health-and-wellbeing>

- having a behaviour policy that is aimed at supporting vulnerable students in the college. The behaviour policy outlines measures to prevent bullying, including cyber-bullying, prejudice-based and discriminatory bullying.
- having clear procedures are in place for addressing and minimising the risk of child-on-child abuse, including harmful sexual behaviours, sexual violence and sexual harassment.
- acknowledging the importance of ‘contextual safeguarding’, <https://contextualsafeguarding.org.uk/> which considers wider environmental factors in a student’s life that may be a threat to their safety and/or welfare.

[Working Together To Safeguard Children December 2023](#) and [KCSIE 2023](#))

- alerting the relevant authority (Hammersmith and Fulham Children & Family Care) if it is aware of any child being looked after under a Private Fostering arrangement. On admission to Leiths, and at other times, Leiths will be vigilant in identifying any private fostering arrangement.
- acknowledging that a child who is looked-after or has been previously looked-after by the Local Authority (a Child in Care, CIC), potentially remains vulnerable and all staff have the skills, knowledge and understanding to support these children.

5. DEALING WITH A DISCLOSURE AND RECORD KEEPING

If a member of staff has a concern about a child or if a child makes a disclosure, staff will appropriately respond by listening and offering reassurance. Staff should:

1. Make an accurate factual record as soon as possible including details of:
 - Dates and times of their observations
 - Dates and times of any discussions in which they were involved
 - Details of any injuries
 - Explanations given by the child/adult

- What action was taken
- Any actual words or phrases used by the person making the disclosure
- Any questions the staff member asked (remembering not to ask any leading questions)

The records must be signed and dated by the author (or equivalent on electronic based records).

2. Listen to wishes and feelings of the student, but not to promise any confidentiality.
3. Report safeguarding and pastoral concerns asap to the DSL or DDSL who will record details on the Safeguarding Log and share having done so with other members of the Safeguarding Committee (DSL and DDSLs).
4. The DSL will consider if there is a requirement for immediate medical intervention, however, urgent medical attention should not be delayed if the DSL is not immediately available.
5. In the absence of the DSL or DDSL, staff will refer directly to MASH or the child's social worker (if applicable) and the police (if appropriate) if there is a significant concern, for advice and guidance.
6. The DSL will ensure any decisions and justifications for those decisions are recorded in writing with clear outcomes documented following any action taken.
7. Leiths will discuss any concerns we have with the student's parents where the student is aged under 18. There may be occasions when this is not appropriate and staff will consult with other agencies prior to involving parents where this is likely to be of concern. We will record any decision not to discuss with parents and why. Where the student is aged over 18, we may contact the parent where this is considered appropriate by the Safeguarding Committee. Leiths' Terms & Conditions make provision for this.
8. Safeguarding records are kept for individual students and are maintained separately from all other records relating to the child in school. Safeguarding and Child-Protection records are kept in accordance with General Data Protection Regulations (GDPR) and our own GDPR policy.
9. In the case of a child transferring to a new school or college, all safeguarding records will be transferred in accordance with GDPR to the child's receiving institution. A receipt of delivery will be obtained. We will ensure that if a student who is the subject of a Child Protection (CP) Plan leaves, their information is transferred to the new institution within 5 school days and that the child's social worker is informed that the child has moved. We recognise that in the context of Leiths, such a transfer would be most unusual given the age-profile of our students. Nevertheless, the DSL is aware of the school's responsibilities in this area and is ready to act accordingly.

10. The Principal will be kept informed of any significant concerns by the DSL, and all other staff are informed on a need-to-know basis.

6. THE ROLE OF AN APPROPRIATE ADULT IN SAFEGUARDING

The Police and Criminal Evidence (PACE) Act 1984 advises that “The role of the appropriate adult (AA) is to safeguard the rights, entitlements and welfare of juveniles and vulnerable persons”, with there being further elaboration that the AA is expected to observe that the police are acting properly and fairly in relation to a vulnerable detained person’s rights and entitlements, as well as helping the detained person understand their rights.

In the unlikely event of a student at Leiths requiring an appropriate adult to safeguard their rights, then all staff understand this role and could be called upon to act properly and fairly if called upon to be an AA.

7. INFORMATION SHARING

We recognise that all matters relating to safeguarding are confidential.

All staff members have a professional responsibility to share information with other agencies to safeguard children.

All staff members who come into contact with children will be given appropriate training to understand the purpose of information sharing in order to safeguard and promote children’s welfare.

We will ensure that staff members are confident about what they can and should do under the law, including how to obtain consent to share information and when information can be shared without consent.

Staff must not assume a colleague or another professional will take action and share information that might be critical in keeping children safe.

8. MULTI AGENCY WORKING

We will develop and promote effective working relationships with other agencies, including agencies providing early help services to children, the police, and Children’s Social Care, balancing this with the likely level of need in view of the further education nature of Leiths.

We will ensure that relevant staff members participate in multi-agency meetings and forums, including child protection conferences and core groups, to consider individual children.

We will participate in Child Safeguarding Practice Reviews (CSPRs), other reviews and file audits as and when required to do so by Hammersmith & Fulham Local Safeguarding Children Partnership. We will ensure that we have a clear process for gathering the evidence required

for reviews and audits and embed recommendations into practice and compile required actions within agreed timescales.

9. SAFER RECRUITMENT

Leiths' Safer Recruitment Policy can be found on the school website.

Leiths is committed to ensuring the development of a safe culture and that all steps are taken to recruit staff and volunteers who are safe to work with our students and staff.

The Board of Directors and Senior Management Team are responsible for ensuring that the school follows safe recruitment processes outlined within guidance.

Leiths is responsible for ensuring that the school's HR department maintains an accurate Single Central Record (SCR) in line with statutory guidance. This is reviewed periodically with spot-checks by the DSL who then in turn confirms compliance with statutory guidance to the Board Member with Safeguarding Responsibility.

The Board of Directors, in line with Leiths' Safer Recruitment Policy, will ensure that at least one of the people who conducts a staff recruitment interview has completed safer recruitment training.

We are 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 will ensure that contractors and other providers are aware of our safeguarding policy and procedures. We require that employees and volunteers provided by these organisations use our procedure to report concerns.

We seek assurance that employees and volunteers provided by these organisations and working with our children have been subjected to the appropriate level of safeguarding checks in line with *Keeping Children Safe in Education: Statutory Guidance for Schools and Colleges, 2022*. If assurance is not obtained, permission to work with our children or use our college premises is refused where the contractor could be in Regulated Activity.

We require all staff to disclose any reason that may affect their suitability to work with children that could be a transferable risk to their role.

10. TRAINING

All staff in our college are expected to be aware of the signs and symptoms of abuse and must be able to respond appropriately.

Our DSL and DDSLs undergo training to provide them with the knowledge and skills required to carry out their role. Our DSL and DDSLs undergo their DSL training at least every 2 years to enable them to fulfil their role.

Safeguarding Training is provided for all staff to a generalist level, with regular updates, generally electronically, at least once each term during term-time. Face-to-face safeguarding training takes place at least once every three years.

Separate training is provided to all new staff on appointment as part of their induction process which also includes Prevent and online safety which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring.

The Designated Safeguarding Lead provides briefings to the staff on any changes to safeguarding legislation and procedures and relevant learning from Safeguarding Practice Reviews (CSPRs) in line with Working Together 2023. These occur annually or more frequently when necessary. Furthermore, the DSL's regular updates furnish staff with information on trends and prevalent concerns with regard to safeguarding, including online safety, ensuring staff are aware of their roles and responsibilities with regard to filtering and monitoring.

All staff are required to read Keeping Children in Education Guidance, Part 1 and Annex B annually. They have to confirm that they have read and understood the guidance and that they will act in the spirit of the guidance. The Senior Management Team is required to read all parts of the KCSIE guidance.

Leiths HR department keeps accurate and up-to-date records of staff induction and training.

11. WHISTLEBLOWING IN A SAFEGUARDING CONTEXT

Leiths' Whistleblowing Policy is available on the website. This summary outlines the process when there is a concern that safeguarding issues have not been reported or followed correctly.

Whistleblowing is a term that is used when staff want to report a concern within their organisation that involves their manager or a person senior to them in the organisation which may prevent them from following the normal reporting systems.

There are a limited number of areas that can be called Whistleblowing, and the policy protects staff from being punished for raising concerns.

Within **Leiths School of Food and Wine (Leiths)**, the Principal, **Jenny Stringer** is the senior manager and responsible for all staff. If you are concerned that any member of staff, including the Designated Safeguarding Lead or any member of the safeguarding team, within the school is not following safeguarding processes or behaving in a way that is placing students at risk, you should make the Principal (or Acting Principal) aware in person or via e-mail,

jenny.stringer@leiths.com The Principal will report any allegations relating to staff to the LADO within 24 hours.

Where your concern is more of a “nagging doubt” nature, then this is considered to be a **low level concern** and you should report this in confidence to the DSL or a DDSL who is in a position to monitor the matter and notice any patterns of behaviour that are of concern so that if such a case the matter can be escalated to the Principal.

If your concern is about the Principal, you should raise this with **Caroline Waldegrave**, Leiths’ Director with specific responsibility for safeguarding, who can be contacted in confidence via the reception office.

The Director with specific responsibility for safeguarding will report any allegations relating to the Principal to the LADO within 24 hours.

If you would prefer to raise your concerns outside of the school, then you are able to contact the NSPCC whistleblowing line on 0800 028 0285 or email help@nspcc.org.uk for national organisations or make contact with Hammersmith and Fulham Children’s Services: 020 8753 6600

familyservices@lbhf.gov.uk

Out of hours service: 020 8748 8588

If you believe that a member of the school staff is harming a child (an allegation) and this has been reported to the Principal and no/insufficient action has been taken, or the member of staff you have concerns about is the Principal, then you should contact the Local Authority Designated Officers (LADO) on 07776 673020, Megan.brown@lbhf.gov.uk

If you believe that a child is being abused by individuals outside the school, you can make a direct referral to Children’s Social Care by calling the Multi-Agency Safeguarding Hub (MASH):

020 8753 6600

familyservices@lbhf.gov.uk

Out of hours service: 020 8748 8588

Further guidance for staff can be accessed through:

<https://www.gov.uk/government/publications/what-to-do-if-youre-worried-a-child>
[ishttps://www.gov.uk/government/publications/promoting-children-and-young-peoples-emotional-health-and-wellbeingbeing-abused--2](https://www.gov.uk/government/publications/promoting-children-and-young-peoples-emotional-health-and-wellbeingbeing-abused--2) and through the NSPCC website
<https://www.nspcc.org.uk/what>
[ishttps://www.londonsafeguardingchildrenprocedures.co.uk/thresholds.htmlchild-abuse/types-of-abuse/](https://www.londonsafeguardingchildrenprocedures.co.uk/thresholds.htmlchild-abuse/types-of-abuse/)

12. SITE SECURITY

All staff members have a responsibility to ensure our buildings and grounds are safe. This includes ensuring the safety of any visitors into college.

Leiths' visitor policy is held at Reception.

Leiths will not accept the behaviour of anyone 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 the person access to the school site.

13. QUALITY ASSURANCE

We will ensure that systems are in place to monitor the implementation of and compliance with this policy and accompanying procedures.

Leiths' senior management and the Board of Directors will ensure that action is taken to remedy any deficiencies and weaknesses identified in child protection arrangements without delay.

14. POLICY REVIEW

This policy and the procedures are reviewed every academic year. All other linked policies will be reviewed in line with the policy review cycle. Additional updates to the safeguarding policy and appendices will take place when needed.

The Designated Safeguarding Lead ensures that staff members, including volunteers and sessional workers are made aware of any amendments to policies and procedures.

APPENDIX A:

The role of the Designated Safeguarding Lead

Managing referrals:

- Refer cases to the MASH, and the police where appropriate, in a timely manner avoiding any delay that could place the child at more risk.
- Identify any safeguarding issues relating to individual children, especially ongoing enquiries under section 47 of the Children Act 1989.
- Act as a source of support, advice, and expertise to staff on matters of child protection and safeguarding, including online safety.

Record keeping:

- Keep written (or online) records of safeguarding and welfare concerns and ensure a standalone file is created as necessary for children with safeguarding concerns.
- Leiths should have at least two emergency contacts for every student in the school in case of emergencies, and in case there are welfare concerns at the home.

- Maintain a chronology of significant incidents for each student with safeguarding concerns, including a record of decisions made and the reasons for those decisions.
- Ensure such records are kept confidentially and securely and separate from the student's educational record.
- In the unlikely event that a student aged under 18 leaves Leiths, the Designated Safeguarding Lead will contact the Designated Safeguarding Lead at the new school and will ensure that any safeguarding file is forwarded to the receiving school within 5 school days. We will retain evidence to demonstrate how the file has been transferred; this may be in the form of a written confirmation of receipt from the receiving school and/or evidence of recorded delivery.

Multi-agency working and information sharing:

The DSL recognises and is committed to its responsibility to work with other professionals and agencies in line with statutory guidance.

Leiths is **not** the investigating agency when there are child protection concerns. We will, however, contribute to any investigation and assessment processes as required. We recognise the importance of multi-agency working and will support attendance at relevant safeguarding meetings, including Child Protection Conferences, Core Groups, Strategy Meetings, Child in Need meetings or other early help multi-agency meetings.

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/721581/Information_sharing_advice_practitioners_safeguarding_services.pdf

Training:

The DSL will ensure all staff undertake appropriate annual updates in order to:

- be able to recognise signs of abuse and how to respond to them, including special circumstances such as child sexual exploitation, female genital mutilation, fabricated or induced illness
- understand the assessment process for providing early help and intervention, e.g., thresholds of need (<https://www.lbhf.gov.uk/children-and-young-people/localhttps://contextualsafeguarding.org.uk/safeguarding-children-partnership/lscp-thresholds-need-guide>), preventative education, and the local offer
- have a working knowledge of how the local authority conducts initial and review child protection (CP) case conferences and contribute effectively to these; and
- be alert to the specific needs of children in need (as specified in section 17 of the Children Act 1989), those with special educational needs, pregnant teenagers, young carers, those who are privately fostered, vulnerable to exploitation, radicalisation and subject to listening or hearing to domestic abuse.
- Ensure each member of staff has read and understands the school's safeguarding policy and procedures, including providing induction on these matters to new staff members. Induction and training must include familiarisation with the Staff Code of

Conduct and Student Handbook as well as the Safeguarding Policy, dealing with disclosures and managing allegations processes.

- Organise face-to-face whole-school safeguarding training for all staff members at least **every three years**.
- The DSL will ensure their training remains in date (every 2 years)
- Ensure the college allocates time and resources every year for relevant staff members to attend training and receive continuous professional development opportunities.
- Encourage a culture of listening to students and taking account of their wishes and feelings in any action the school takes to protect them.
- Ensure the HR department maintains accurate records of induction, ongoing training, and continual professional development (CPD) relating to safeguarding.

Awareness raising:

- Ensure Leiths' Safeguarding and Child Protection Policies are known, understood, and used appropriately.
- Ensure Leiths' Safeguarding Policy is reviewed annually (as a minimum) and that the procedures and implementation are updated and reviewed regularly, and work with the directors regarding this.
- Ensure our Safeguarding Policy is available publicly and that parents know referrals about suspected abuse or neglect may be made and the role of the school or college in this.
- Monitor the implementation of and compliance with policy and procedures, including periodic audits of safeguarding and welfare concerns files (at a minimum once a year) where these exist.
- Complete the Section 11 annual safeguarding audit and submit it to the Local Authority.
- Provide regular reports, to the Board of Directors detailing changes and reviews to policy, training undertaken by staff members and the number of children with child protection plans (if any) and other relevant data.
- Take lead responsibility for remedying any deficiencies and weaknesses identified in safeguarding arrangements.
- Ensure Leiths provides an opportunity to staff who are working directly with vulnerable young people to have regular access to an appropriate manager to talk through and reflect on their involvement with the student's case.

APPENDIX B:

Safeguarding Procedures

Definitions:

- **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. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others (e.g., via the internet). They may be abused by an adult or adults or another child or children.
- **Children** are any people who have not yet reached their 18th birthday; a 16-year-old, whether living independently, in further education, in the armed forces or in hospital, is a child and is entitled to the same protection and services as anyone younger. KCSIE applies to providers of post 16 education as set out Education and Training (Welfare of Children) Act 2021.
- **Child protection** is part of safeguarding and promoting the welfare of children and refers to activity undertaken to protect specific children who are suffering, or likely to suffer, significant harm, or significant harm is suggested.
- **Early help** means providing support as soon as a problem emerges, at any point in a child's life, from the foundation years to teenage years.
- **Harm** is ill-treatment or impairment of health and development, including impairment suffered from seeing or hearing the ill treatment of another.
- **Safeguarding children** is the action we take to promote the welfare of children and protect them from harm.
- **Safeguarding and promoting the welfare of children** is defined as:
 - protecting children from maltreatment
 - preventing the impairment of children's mental health, physical health or development
 - ensuring the children grow up in circumstances consistent with the provision of safe and effective care
 - taking action to enable all children to have the best outcomes

Staff at Leiths are particularly important, as they are in a position to identify concerns early, provide help for children, promote children's welfare, and prevent concerns from escalating (KCSIE 2023)

A bespoke helpline is available for children and young people who have experienced abuse at school, and for worried adults and professionals who need support and guidance. If you are concerned about something, you can contact the NSPCC helpline Report Abuse in Education on 0800 136 663 or email help@nspcc.org.uk

- **Significant harm** is the threshold that justifies compulsory intervention in the family in the best interests of the child. Section 47 of the Children Act 1989 states 'where the question of whether harm suffered by a child is significant turns on the child's health or development, his health or development shall be compared with that which could reasonably be expected of a similar child.'
- **Vulnerable children:** Any child may benefit from [early help](#), but all staff at Leiths should be particularly alert to the potential need for early help for a child who:
 - is disabled and has specific additional needs.
 - has special educational needs (whether they have a statutory Education, Health and Care Plan).
 - is a young carer.
 - is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups.
 - is frequently missing/goes missing from care or from home.
 - is at risk of modern slavery, trafficking, or exploitation.
 - is at risk of being radicalised or exploited.
 - is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse; <https://www.gov.uk/government/collections/domestic-abuse-bill>
 - is misusing drugs or alcohol themselves.
 - has returned home to their family from care; or
 - is a privately fostered child.

Categories of Abuse:

- **Emotional abuse** is the persistent emotional maltreatment of a child such that it causes severe and persistent adverse effects on the child's emotional development and conveying that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include:
 - not giving 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
- interactions that are beyond a child's developmental capability

- overprotection and limitation of exploration and learning
- preventing the child from participating in normal social interaction
- seeing or hearing the ill-treatment of another
- 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.

- **Neglect** is the persistent failure to meet a child's basic physical 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 misuse. Once a child is born, it may involve a parent 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
 - ensure access to appropriate medical care or treatment

It may also include neglect of, or unresponsiveness to, a child's basic emotional needs. Educational neglect is also considered: <https://www.nspcc.org.uk/what-is-child-abuse/types-of-abuse/abuse/types-of-abuse/neglect/>

- **Physical abuse** may involve hitting, shaking, throwing, poisoning, burning, 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.
- **Sexual abuse: involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence,** whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education (KCSIE 2022).

Mental Health:

- All staff should also be aware 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
- Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff, however, 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
- Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children's experiences, can impact on their mental health, behaviour, and education
- If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following their child protection policy, and speaking to the designated safeguarding lead or one of the deputies.

For governmental advice

see: <https://www.gov.uk/government/publications/promoting-children-and-younghttp://www.fco.gov.uk/en/travel-and-living-abroad/when-things-go-wrong/forced-marriage/case-studies/safer-schools-partnershippeopleseotional-health-and-wellbeing>

The Department for Education has published advice and guidance on [Preventing and Tackling Bullying](#), and [Mental Health and Behaviour in Schools](#). In addition, Public Health England has produced a range of resources to support secondary school teachers to promote positive health, wellbeing and resilience among young people including its guidance [Promoting children and young people's emotional health and wellbeing](#). Its resources include social media, forming positive relationships, smoking and alcohol. See [Every Mind Matters](#) for links to all materials and lesson plans. Although these resources are aimed at schools, they may also be useful at Leiths.

There are three thresholds for and types of referral that need to be considered:

Is this a child with additional needs?

- where their health, development or achievement may be adversely affected?
- age-appropriate progress is not being made and the causes are unclear
- the support of more than one agency is needed to meet the child or young person's needs

If this is a child with additional needs discuss the issues with the ICAT Team at Hammersmith & Fulham Council (<https://www.lbhf.gov.uk/children-and-young-people/local-safeguardinghttps://www.saferinternet.org.uk/advice-centre/teachers-and-school-staff/appropriate-filtering-and-monitoringchildren-partnership/child-safeguarding-contacts>)

Is this a child in need matter? Section 17 of the Children Act 1989 says:

- they are unlikely to achieve or maintain, or to have opportunity to achieve or maintain, a reasonable standard of health or development, without the provision of services by a local authority
- their health or development is likely to be impaired, or further impaired, without the provision of such services
- they are SEND (and as such can face additional safeguarding challenges)

If this is a child in need, discuss the issues with the Designated Safeguarding Lead and parents. Obtain their consent for referral.

Is this a child protection matter? Section 47 of the Children Act 1989 says:

- children at risk or who are suffering significant harm
- children suffering the effects of significant harm
- serious health problems

More on the thresholds can be found here:

<https://www.londonsafeguardingchildrenprocedures.co.uk/files/threshold.pdf>

If this is a child protection matter, this should be discussed with the Designated Safeguarding Lead and will need to be referred to the MASH by the DSL as soon as possible. <https://www.lbhf.gov.uk/children-and-young-people/local-safeguarding><http://www.fco.gov.uk/en/travel-and-living-abroad/when-things-go-wrong/forced-marriage/case-studies/safer-schools-partnershipchildren-partnership/child-safeguarding-contacts>

APPENDIX C:

Further information

Female Genital Mutilation

Female Genital Mutilation (FGM) comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is **illegal in the UK** and a form of child abuse with long-lasting harmful consequences. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a girl being at risk of FGM, or already having suffered FGM.

<https://www.lbhf.gov.uk/crime/violence-against-women-and-girls/violence-against><https://www.gov.uk/government/publications/prevent-duty-guidance-women-and-girls-strategy-2022-2027>

See <https://www.creativeeducation.co.uk/courses/addressing-concerns-about-female>https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1181955/Keeping_children_safe_in_education_2023.pdfhttps://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1181955/Keeping_children_safe_in_education_2023.pdf genital-mutilation/ for useful training.

Indicators - There is a range of potential indicators that a girl may be at risk of FGM. The Creative Education training link above will prove useful in summarising some of these. Section 5C of the Female Genital Mutilation Act 2003 (as inserted by section 75 of the Serious Crime Act 2015) gives the Government powers to issue statutory guidance on FGM to relevant persons. Once the government issues any statutory multi-agency guidance this will apply to schools and colleges. •

Actions - If staff have a concern, they should activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and children's social care. Mandatory reporting commenced in October 2015. These procedures remain when dealing with concerns regarding the potential for FGM to take place. Where a teacher discovers that an act of FGM appears to have been carried out on a girl who is aged under 18, there will be a statutory duty upon that individual to report it to the police.

Mandatory Reporting Duty -From October 2015, Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) placed a statutory duty upon teachers, along with social workers and healthcare professionals, to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Those failing to report such cases will face disciplinary sanctions. It will be rare for teachers to see visual evidence, and they should not be examining students, but the same definition of what is meant by "to discover that an act of FGM appears to have been carried out" is used for all professionals to whom this mandatory reporting duty applies. Unless the staff member has a good reason not to, they must consider and discuss any such case with the designated safeguarding lead. The same is true for Leiths where a disclosure is made by a student aged over 18, even though mandatory reporting is not in place.

Fabricated or Induced Illness / Perplexing Presentation

Staff must be aware of the risk of children being abused through fabricated or induced illness (FII). There are three main ways of the carer fabricating or inducing illness in a child.

These are not mutually exclusive and include:

- fabrication of signs and symptoms. This may include fabrication of past medical history.
- fabrication of signs and symptoms and falsification of hospital charts and records, and specimens of bodily fluids. This may also include falsification of letters and documents.
- induction of illness by a variety of means.

Where this is identified and considered a risk a referral will be made to the MASH for support and guidance. Leiths may involve other agencies in making their assessments. That could include a community paediatrician, occupational therapists for example.

Gang and Youth / Serious Violence

Children and Young People who become involved in gangs are at risk of violent crime and as a result of this involvement are deemed vulnerable. Agencies and professionals have a responsibility to safeguard these children and young people and to prevent further harm both to the young person and their potential victims. Risks associated with gang activity include access to weapons (including firearms), retaliatory violence and territorial violence with other gangs, knife crime, sexual violence, and substance misuse

<https://www.gov.uk/government/publications/serious-violence-strategy>

Children are increasingly being targeted and recruited online using social media. Children can easily become trapped by this type of exploitation as county lines gangs can manufacture drug debts which need to be worked off or threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

A number of the indicators for CSE (Child Sexual Exploitation) and CCE (Child Criminal Exploitation) may be applicable to where children are involved in county lines. Some additional specific indicators that may be present where a child is criminally exploited through involvement in county lines are children who:

- go missing and are subsequently found in areas away from their home.
- have been the victim or perpetrator of serious violence (e.g., knife crime).

Faith Based Abuse

Our policy recognises the 'National Action Plan to Tackle Abuse linked to faith or belief' which describes this abuse as:

'not about challenging people's beliefs, but where beliefs lead to abuse that must not be tolerated. This includes belief in witchcraft, spirit possession, demons or the devil, the evil eye, or djinns, dakini, kindoki, ritual or muti murders and use of fear of the supernatural to make children comply with being trafficked for domestic slavery or sexual exploitation. The beliefs which are not confined to one faith, nationality or ethnic community.'

When this type of abuse is suspected staff will make a referral to the MASH Team for support and guidance.

<https://www.gov.uk/government/publications/national-action-plan-to-tackle-child-abuselinked-to-faith-or-belief>

Risk of Trafficking

Article 3 of the Palermo Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children, Supplementing the United Nations Convention Against Transnational Organised Crime to the UN Convention (2000) (ratified by the UK on 6 February 2006) defines trafficking as:

- “Trafficking of persons” shall mean the recruitment, transportation, transfer, harbouring or receipt of persons, by means of the threat of or use of force or other forms of coercion, of abduction, of fraud, of deception, of the abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person, for the purpose of exploitation. Exploitation shall include, at a minimum, the exploitation of the prostitution of others or other forms of sexual exploitation, forced labour or services, slavery, or practices similar to slavery, servitude, or the removal of organs.
- The consent of a victim of trafficking in persons to the intended exploitation set forth in sub-paragraph (a) of this article shall be irrelevant where any of the means set forth in subparagraph (a) have been used.
- The recruitment, transportation, transfer, harbouring or receipt of a child for the purpose of exploitation shall be considered “trafficking in persons” even if this does not involve any of the means set forth in subparagraph (a) of this article
- “Child” shall mean any person under eighteen years of age.

Children trafficked into the country may be registered at a school or college for a term or longer, before being moved to another part of the UK or abroad. This pattern of registration and deregistration may be an indicator that a child has been trafficked. It has been identified as a particular concern in schools which are situated near ports of entry, but practitioners should be alert to this possibility in all educational establishments, particularly those sponsoring students on a Tier 4 visa. However, practitioners should always bear in mind that not all children who go missing from education have been victims of trafficking. For example, there may be instances of children from communities that move around – Gypsy, Roma, traveller, or migrant families – who collectively go missing from school.

If a member of the college staff suspects that a child may have been trafficked, they should act immediately to inform the senior member of staff with designated responsibility for child protection and ensure that police or local authority children’s social care are contacted immediately.

Risks Associated with Parent/Carer Mental Health

The majority of Parents who suffer mental ill-health can care for and safeguard their children and/or unborn child. Some parents, however, will be unable to meet the needs and ensure the safety of their children. Leiths will follow the guidance outlined in ‘working with parents with mental health problems and their children’ (Think child, think parent, think family: a guide to parental mental health and child welfare).

<https://www.scie.org.uk/publications/guides/guide30/>

Our approach is to recognise; seek support; instil preventive factors and monitor. Leiths' Designated Safeguarding Lead should seek support through the Early Help team but escalate to the MASH Team if they are concerned that the child involved is being placed at immediate risk of harm. The link below details the Early Help services available to children, young people, and their families.

<https://www.lbhf.gov.uk/children-and-young-people/local-safeguarding-children-partnership/child-safeguarding-contacts>

Drugs and Alcohol

Children can be at risk of drugs and alcohol directly and indirectly. They may be at direct risk of having access to these substances (see guidance on gangs) or indirectly because they affect family life at home through use by parents/carers, siblings, child-minders etc. See Hammersmith & Fulham Local Safeguarding Partnership for further information:

<https://www.lbhf.gov.uk/children-and-young-people/local-safeguarding-children><https://www.creativeeducation.co.uk/courses/addressing-concerns-about-female-genital-mutilation/partnership/lscp-thresholds-need-guide> and Young Minds: <https://www.youngminds.org.uk/parent/parents-a-z-mental-health-guide/drugs-and-alcohol/>

(So-called) Honour-Based Violence and Forced Marriages

Honour-Based Violence and Forced Marriage refers to a collection of practices used to control behaviour within families to protect perceived cultural or religious beliefs and honour.

Violence can occur when offenders perceive that a relative has shamed the family or community by breaking their 'code of honour'. Honour-Based Violence cuts across all cultures and communities: Turkish, Kurdish, Afghani, South Asian, African, Middle Eastern, South, and Eastern European for example. This is not an exhaustive list. Where a culture is heavily male dominated, HBV may exist.

'A forced marriage is a marriage in which one or both spouses do not (or, in the case of some vulnerable adults, cannot) consent to the marriage and duress is involved. Duress can include physical, psychological, financial, sexual and emotional pressure.' For more information see:

<http://www.fco.gov.uk/en/travel-and-living-abroad/when-things-go-wrong/forced-marriage/>

<http://www.fco.gov.uk/en/travel-and-living-abroad/when-things-go><https://www.lbhf.gov.uk/children-and-young-people/local-safeguarding-children-partnership/child-safeguarding-contacts><http://www.fco.gov.uk/en/travel-and-living-abroad/when-things-go-wrong/forcedmarriage/case-studies/safer-schools-partnership>

<http://www.karmanirvana.org.uk/>

Hammersmith & Fulham Council's "Ending Violence Against Women and Girls" (VAWG) initiative provides useful information and further contact:

<https://www.lbhf.gov.uk/crime/violence-against-women-and-girls/violence-against-women><http://www.karmanirvana.org.uk/and-girls-strategy-2022-2027>

Managing Allegations Against Staff

The Local Authority Designated Officer for Allegations (LADO) must be told of allegations against adults working with children and young people within 24 hours. Leiths' Director delegated by the Board to represent them with regard to safeguarding (Camilla Schneideman) should refer to this guidance if there is an allegation against the Principal. This includes all cases that meet the harms threshold where a person is alleged to have:

- behaved in a way that has harmed, or may have harmed a child
- possibly committed a criminal offence against, or related to, a child
- behaved towards a child or children in a way that indicates they may pose a risk of harm to children
- behaved or may have behaved in a way that indicates they may not be suitable to work with children. This includes behaviour that may have happened outside of school or college, that might make an individual unsuitable to work with children, and is known as transferable risk. Where appropriate an assessment of transferable risk to children with whom the person works should be undertaken. If in doubt seek advice from the local authority designated officer (LADO) There

are two levels of allegation/concern:

- allegations that may meet the harms threshold (see definition above)
- allegation/concerns that do not meet the harms threshold – referred to in 2022 guidance as 'low level concerns'

Directors should have policies and processes to deal with concerns (including allegations) which do not meet the harm threshold. Concerns may arise in several ways and from a number of sources. For example: suspicion; complaint; or disclosure made by a child, parent, or other adult within or outside of the organisation; or as a result of vetting checks undertaken.

It is important that schools and colleges have appropriate policies and processes in place to manage and record any such concerns and take appropriate action to safeguard children.

'Low Level Concerns' - Creating a culture in which all concerns about adults (including allegations that do not meet the harms threshold are shared responsibly and with the right person, recorded and dealt with appropriately, is critical.

A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' - that an adult working in or on behalf of the school or college may have acted in a way that is inconsistent with the staff code of conduct, including inappropriate conduct outside of work; and does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.

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

- being over-friendly with children
- having favourites
- taking photographs of children with their personal mobile phone
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door
- 'humiliating students'

Such concerns should always be recorded and reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified.

The Local Authority Designated Officer is **Megan Lloyd**, contactable by phone on 07776 673020 or by email at megan.brown@lbhf.gov.uk or LADO@lbhf.gov.uk

An Allegations and Consultation Referral Form must be completed by the Principal in full and forwarded to the LADO via email within 24 hours.

Preventing Radicalisation

Protecting children from the risk of radicalisation should be part of Leiths' wider safeguarding duties and is similar in nature to protecting children from other forms of harm and abuse. During the process of radicalisation, it is possible to intervene to prevent vulnerable people being radicalised.

Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism. There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. Specific background factors may contribute to vulnerability which are often combined with specific influences such as family, friends or online, and with specific needs for which an extremist or terrorist group may appear to provide an answer. The internet and the use of social media has become a major factor in the radicalisation of young people. As with managing other safeguarding risks, staff should be alert to changes in children's behaviour and that of our wider Leiths community which could indicate that a person may need help or protection. Leiths staff should use their professional judgement in identifying children, staff or students who might be at risk of radicalisation and act proportionately which may include making a referral to the Channel programme.

From 1 July 2015 all schools are subject to a duty under section 26 of the Counterterrorism and Security Act 2015 ('The CTSA 2015'). Schools must have regard to statutory PREVENT GUIDANCE issued under section 29 of the CTSA 2015. Paragraphs 57-76 of the Prevent guidance are concerned specifically with schools' responsibility to the need to prevent people from being drawn into terrorism." This duty is known as the Prevent duty. It applies to a wide

range of public-facing bodies. In this context, Leiths is considered to be a school and the Prevent duty applies here.

The statutory Prevent guidance summarises the requirements on schools in terms of four general themes:

- risk assessment
- working in partnership
- staff training
- IT policies

Schools are expected to assess the risk of children being drawn into terrorism, including support for extremist ideas that are part of terrorist ideology. This means being able to demonstrate both a general understanding of the risks affecting children and young people in the area and a specific understanding of how to identify individual children who may be at risk of radicalisation and what to do to support them. Schools and colleges should have clear procedures in place for protecting children at risk of radicalisation. It is not necessary for schools and colleges to have distinct policies on implementing the Prevent duty. The Prevent duty builds on existing local partnership arrangements. For example, governing bodies and proprietors of all schools should ensure that their safeguarding arrangements consider the policies and procedures of Local Safeguarding Children Board (LSCBs).

Designated safeguarding leads and other senior leaders should familiarise themselves with the revised [Prevent duty guidance: for England and Wales](#).

The **Prevent** guidance refers to the importance of Prevent awareness training to equip staff to identify children at risk of being drawn into terrorism and to challenge extremist ideas. Individual schools are best placed to assess the training needs of staff in the light of their assessment of the risk to students at the school of being drawn into terrorism. As a minimum, however, schools should ensure that the designated safeguarding lead undertakes Prevent awareness training and is able to provide advice and support to other members of staff on protecting children from the risk of radicalisation. Most new staff at Leiths are routinely required to complete the Government Prevent Training before starting work: <https://www.gov.uk/guidance/prevent-duty-training> .

Schools must ensure that children are safe from terrorist and extremist material when accessing the internet in schools. Schools should ensure that suitable filtering is in place. It is also important that schools teach students about online safety more generally. At Leiths we have filtering software in place which is regularly updated through Morcan, our IT provider. These filters are tested routinely by the DSL so that the Board is assured that students are kept safe.

Channel

Leiths' staff should understand when it is appropriate to make a referral to the Channel team. Channel is a programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. It provides a mechanism for schools to make referrals if they are concerned that an individual might be vulnerable to radicalisation. An individual's engagement with the programme is entirely voluntary at all stages. Any referral can be made through the DSL or one of the DDSLs.

Section 36 of the CTSA 2015 places a duty on local authorities to ensure Channel panels are in place. The panel must be chaired by the local authority and include the police for the relevant local authority area. Following a referral, the panel will assess the extent to which identified individuals are vulnerable to being drawn into terrorism, and, where considered appropriate and necessary consent is obtained, arrange for support to be provided to those individuals. Section 38 of the Counter-Terrorism and Security Act 2015 (CTSA) requires partners of Channel panels to co-operate with the panel in the carrying out of its functions and with the police in providing information about a referred individual. Schools and colleges are required to have regard to Keeping Children Safe in Education and, as partners, are required to cooperate with local Channel panels. Channel guidance can be found here:

<https://www.gov.uk/government/publications/channel-and-prevent-multi-agency><http://www.fco.gov.uk/en/travel-and-living-abroad/when-things-go-wrong/forced-marriage/case-studies/safer-schools-partnershippanelmap-guidance>

Child Missing and/or Frequently Absent From Education

- All children, regardless of their circumstances, are entitled to a **full-time education** which is suitable to their age, ability, aptitude, and any special educational needs they may have. Local authorities have a duty to establish, as far as it is possible to do so, the identity of children of compulsory school age who are missing education in their area. We recognise that that being absent, as well as missing, from education can be warning sign of a range of safeguarding concerns, including sexual abuse, sexual exploitation or child criminal exploitation.

Compulsory school age is from 5 to 16 years and therefore no student at Leiths falls within this category.

Child Sexual Exploitation & Child Criminal Exploitation

Both CSE and CCE are forms of abuse and both occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal activity. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources. In some cases, the abuse will be in exchange for something the victim needs or wants and/or will be to the financial benefit or other advantage (such as increased status) of the perpetrator or facilitator. The abuse can be perpetrated by individuals or groups, males or females and children or adults.

The abuse can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence. Victims can be exploited even when activity appears consensual. As well as being physical can be facilitated and/or take place online.

Child Sexual Exploitation (CSE)

CSE occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. CSE does not always involve physical contact; it can also occur through the use of technology. CSE can affect any child or young person (male or female) under the age of 18 years, including 16- and 17-year-olds who can legally consent to have sex. It can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity and may occur without the child or young person's immediate knowledge (e.g., through others copying videos or images they have created and posted on social media). CCE indicators can also be indicators of CSE, as can children who have older boyfriends or girlfriends; and children who suffer from sexually transmitted infections or become pregnant.

The Department for Education provide: [Child sexual exploitation: guide for practitioners](#)

Child Criminal Exploitation (CCE)

While there is still no legal definition of 'Child Criminal Exploitation' or CCE, it is increasingly being recognised as a major factor behind crime in communities across the UK, while also simultaneously victimising vulnerable young people and leaving them at risk of harm. A simple definition of CCE is: CCE often occurs without the victim being aware that they are being exploited and involves young people being encouraged, cajoled, or threatened to carry out crime for the benefit of others. In return they are offered friendship or peer acceptance, but also cigarettes, drugs (especially cannabis), alcohol or even food and accommodation.

County Lines is a term used to describe gangs, groups or drug networks that supply drugs from urban to suburban areas across the country, including market and coastal towns, using dedicated mobile phone lines or 'deal lines. They exploit children and vulnerable adults to move the drugs and money to and from the urban area, and to store the drugs in local markets. They will often use intimidation, violence, and weapons, including knives, corrosives, and firearms. County lines is a major, cross-cutting issue involving drugs, violence, gangs, safeguarding, criminal and sexual exploitation, modern slavery, and missing persons; and the response to tackle it involves the police, the National Crime Agency, a wide range of Government departments, local government agencies and voluntary and community sector organisations. County lines activity and the associated

violence, drug dealing, and exploitation has a devastating impact on young people, vulnerable adults, and local communities. Further information can be found here <https://www.lbhf.gov.uk/crime/gangs-violence-and-exploitation>

Sexual harassment, violence, harmful sexual behaviours

Sexual violence and sexual harassment can occur between two children of any age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Sexual violence refers to sexual offences under the Sexual Offences Act 2003, including rape, assault by penetration and sexual assault.

It is important that schools and colleges are aware of sexual violence and the fact children can, and sometimes do, abuse their peers in this way. When referring to sexual harassment we mean 'unwanted conduct of a sexual nature' that can occur online and offline and both inside and outside of school/college. When we reference sexual harassment, we do so in the context of child-on-child, sexual harassment. Sexual harassment is likely to: violate a child's dignity, and/or make them feel intimidated, degraded, or humiliated and/or create a hostile, offensive or sexualised environment.

At Leiths, most students are aged over 18 and therefore not defined as "children". Nevertheless, staff remain alert to signs of sexual harassment, violence, harmful sexual behaviours and upskirting and endeavour to protect all students and staff from such behaviours.

Staff must challenge any form of derogatory and sexualised language or behaviour. Staff should be vigilant to sexualised/aggressive touching/grabbing.

The Department for Education (DfE) guidance situates sexual violence, sexual harassment, and harmful sexual behaviour in the context of developing a whole-school safeguarding culture, where sexual misconduct is seen as unacceptable, and not 'banter' or an inevitable part of growing up. Advice about tackling and reporting sexual harassment in schools and colleges is here:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/999239/SVSH_2021.pdf

It should be recognised that these issues are likely to occur, and so schools should have procedures in place to deal with them. Groups at particular risk include girls, students who identify as Lesbian, Gay, Bisexual, Transgender+ (LGBT+), or are perceived by peers to be LGBT+, and students with SEND. We recognise that these children can be targeted by other children, so it is vital we provide a safe space for these children to speak out and share their concerns with members of staff. Students are protected from 'upskirting', bullying, homophobic, bi-phobic and trans-phobic behaviour, racism, sexism, and other forms of

discrimination Staff have familiarity with the [Equality Act 2010 and the Public Sector Equality Duty](#) (PSED), the Human Rights Act 1998 and recent reforms to the Act and how they apply to safeguarding

<https://www.gov.uk/government/consultations/human-rights-act-reform-a-modern-bill><https://www.creativeeducation.co.uk/courses/addressing-concerns-about-female-genital-mutilation/ofrights/outcome/human-rights-act-reform-a-modern-bill-of-rights-consultation-response>

At Leiths we acknowledge the need to treat everyone equally, with fairness, dignity, and respect. Any discriminatory behaviours are challenged, and students are supported to understand how to treat others with respect. Whilst we have a statutory duty to report and record any incidence of bullying, homophobic, biphobic and transphobic behaviour, racism, sexism, and other forms of discrimination where children are concerned, we also endeavour to report such behaviours internally where they occur between adults, taking actions to put an end to such behaviours. With students aged under 18, we must record incidents across the whole spectrum of sexual violence, sexual harassment, and harmful sexualised behaviours so that we can understand the scale of the problem in their institution and make appropriate plans to reduce it. For more guidance go to: KCSIE Part Five.

All such incidents should be immediately reported to the Designated Safeguarding Lead (DSL) or a DDSL who will manage the matter. Victims of harm should be supported by Leiths' pastoral system, usually involving support from the Class Tutor, and the student's wishes and feelings will be considered.

The DSL should be familiar with the full guidance from the UK Council for Internet Safety (UKCIS) regarding sharing nudes and semi-nudes: [Sharing nudes and semi-nudes: advice for education settings working with children and young people - GOV.UK \(www.gov.uk\)](#)

Upskirting

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

Any instance of upskirting that becomes known of at Leiths will be reported to the police.

Consent

Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another, e.g. to vaginal but not anal sex or penetration with conditions, such as wearing a condom. Consent can be withdrawn at

any time during sexual activity and each time activity occurs. Someone consents to vaginal, anal, or oral penetration only if s/he agrees by choice to that penetration and has the freedom and capacity to make that choice. Further information about consent can be found here: [What is sexual consent? | Rape Crisis England & Wales](#)

Digital Safety & Remote Learning

The use of technology has become a significant component of many safeguarding issues. Child sexual exploitation; radicalisation; sexual predation- technology often provides the platform that facilitates harm. An effective approach to online safety empowers a school or college to protect and educate the whole school or college community in their use of technology and establishes mechanisms to identify, intervene and escalate any incident where appropriate.

Given the nature of Leiths where students are mostly aged over 18 and the curriculum is purposely defined as focussed on food and wine, there is no specific curriculum content on online safety. We nevertheless are mindful of the significant risks and mitigate against these as far as possible.

The breadth of issues classified within online safety is considerable, but can be categorised into three areas of risk:

- content: being exposed to illegal, inappropriate, or harmful material
- contact: being subjected to harmful online interaction with other users
- conduct: personal online behaviour that increases the likelihood of, or causes, harm

Leiths has an Acceptable Use Policy (AUP) which covers the security and use of all Leiths' information and IT equipment. With regard to online safety, there is within the AUP information about children accessing the internet whilst they are at Leiths using data on their phones (3G or 4G networks). The policy reinforces the importance of online safety, including making parents aware of what Leiths ask children to do online (e.g., sites they need to visit or with whom they will be interacting online).

The Board of Directors do all that they reasonably can to limit children's exposure to any risks from our IT system and ensure we have appropriate filters and monitoring systems in place, regularly reviewing their effectiveness.

For online safety, there is recognition in this guidance that many students may choose to circumvent our systems by using data on their phones, on the 3G or the 4G network. For this reason, we discourage the use of phones other than for photographing food.

Filters and monitoring

The Board of Directors do all that they reasonably can to limit children's exposure to the above risks from the school's IT system. As part of this process, the Board ensures we have appropriate filters and monitoring systems in place and these are routinely tested.

The Board is mindful of the Department for Education's filtering and monitoring standards (DfE, 2023b) [Meeting filtering and monitoring standards](#) which support schools to have effective systems in place and aims to meet the DfE's Cyber security standards for schools and colleges (DfE, 2023c).

Whilst considering their responsibility to safeguard and promote the welfare of children and provide them with a safe environment in which to learn, governing bodies and proprietors (Our Board of Directors) should consider the age range of their students, the number of students, how often they access the IT system and the proportionality of costs vs risks.

The appropriateness of any filters and monitoring systems are a matter for individual schools and colleges and will be informed in part, by the risk assessment required by the Prevent Duty. The UK Safer Internet Centre has published guidance as to what "appropriate" filtering and monitoring might look like: [UK Safer Internet Centre: appropriate filtering and monitoring](#).

APPENDIX D

Safer Recruitment and the Single Central Record Pre-Appointment Checks and Safer Recruitment

Please refer to Leiths' Safer Recruitment Policy for full details.

Any offer of appointment made to a successful candidate, including one who has lived or worked abroad, must be conditional on satisfactory completion of the necessary preemployment checks.

Single Central Record (SCR)

Schools and colleges must keep a single central record of appointments. Leiths' Safer Recruitment Policy defines in detail what the SCR single central record must cover.

A record of staff leavers is maintained on Leiths' Single Central record.

Governance is not a regulated activity and so our Board of Directors do not need a barred list check unless, in addition to their governance duties, they also engage in regulated activity. Currently this is not the case other than with the Managing Director.

The SCR will be updated in the light of any further legislation. Furthermore, the DSL routinely carries out spot-checks on the SCR and reports any concerns about its accuracy and maintenance to the Board of Directors through the designated Board Member for Safeguarding, Caroline Waldegrave.