



GREENE'S
COLLEGE
OXFORD

Safeguarding and Child Protection Policy

This policy was adopted in August 2024.

This policy is due to be reviewed in August 2025.

The person responsible for the implementation of this policy is the Designated Safeguarding Lead

It is the responsibility of the College's Governing Body, especially the Governor for Safeguarding, to ensure that this policy is reviewed and updated annually.

Safeguarding & child protection policy

Introduction

This policy has been developed in line with principles and requirements expressed in and by the following documents and organisations:

- *Keeping children safe in Education* (Department for Education – September 2024)
- *Working together to safeguard children – A guide to inter-agency working to safeguard and promote the welfare of children*
- *What to do if you are worried a child is being abused – Advice for practitioners* (HM Government - March 2015)
- The NSPCC Safeguarding in Education Self-Assessment Tool (ESAT)
- Oxfordshire Safeguarding Children Board

The directors and senior management of Greene's take seriously their responsibilities and duties under the relevant sections of the 1989 and 2004 Children Acts; and, as required by the Schedule to the Education (Independent Schools Standards) Regulations 2019 – to safeguard and promote the welfare of children; and to work together with other agencies to ensure adequate and relevant arrangements exist to support those children who are suffering harm or are likely to suffer harm.

This policy and procedures applies to all staff working at Greene's because we recognise that all staff have a full and active part to play in protecting children from harm and that the welfare of children – our students – is our paramount concern.

Safeguarding and promoting the welfare of children is defined for the purposes of this policy in accordance with the DfE 2023a update to *Working together to safeguard children*:

- 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 through a kinship care arrangement, whenever possible and where this is in the best interests of the children;
- taking action to enable all children to have the best outcomes in line with the outcomes set out in the Children's Social Care National Framework.

Greene's should provide a safe, caring, positive and stimulating environment that promotes the social, physical and moral development of the individual child free from discrimination or bullying where children can learn and develop happily.

The aims of our policy are:

- to support the child's development in ways that will foster security, confidence and resilience;
- to provide an environment in which children and feel safe, secure, valued and respected; where they feel confident and know how to approach adults if they are in difficulties;
- to raise the awareness with all staff of the need to safeguard children and of their responsibilities in preventing, identifying and reporting possible cases of abuse;
- to provide a framework for identifying children who potentially might be at risk of harm;
- to provide a procedure for monitoring children known or thought to be at risk of harm, and to ensure we contribute to supporting those children where appropriate;
- to acknowledge the need for effective and appropriate communication between all members of staff in relation to safeguarding children;
- to have procedures in place to be followed by all staff in cases of suspected abuse;
- to develop effective working relationships with all other agencies, involved in safeguarding children; and
- to ensure that the suitability of all adults within Greene's who have unsupervised access to children has been checked following approved staff recruitment and selection procedures.
- to ensure all our staff will be equipped to identify children who may benefit from early help. Staff know in the first instance to discuss their concerns with the designated safeguarding lead, and understand they may be required to support other agencies and professionals in assessments for early help.

Principles

At Greene's we will ensure that:

- We have a designated safeguarding lead member of staff and deputy who have undertaken appropriate training for the role – see Appendix I – within the past two years. Our designated lead is the Deputy Principal, Jane Hajny.
- and in her absence, the Admissions Manager Charlie Engelbretson, or the Academic Administrator, Maria Merinova.

- All staff new to Greene's will be made aware of the systems which support safeguarding, these are explained to them as part of their induction and include:
 - o This child protection and safeguarding policy
 - o The staff code of conduct
 - o The role of the designated lead
 - o Keeping children safe in education part 1
 - o Managing allegations about staff or volunteers
 - o Handling low-level concerns
 - o What to do if they have a concern about a child

- All staff receive appropriate safeguarding and child protection training which is updated at least every 3 years. In addition to this training all staff members receive safeguarding and child protection updates, when required but at least annually. This includes opportunities to receive training in order to develop their understanding of the signs and indicators of abuse, how to respond to a pupil who discloses abuse and the procedure to be followed in appropriately sharing a concern of possible abuse or a disclosure of abuse.
- The name of any member of staff considered not suitable to work with children will be notified to the DBS (Disclosure and Barring service), with the advice and support of the OSCB.
- Our safeguarding and child protection policy and procedures will be annually reviewed and up-dated as required.

Responsibilities

Greene's will follow the OSCB guidance in all cases of abuse, or suspected abuse and these can be found on their website: www.oscb.org.uk

We will therefore:

- Ensure that all staff appropriately share any welfare concerns that they may have about children.
- Ensure that we make a report if there are concerns about a child's welfare, possible abuse, neglect or exploitation to the Oxfordshire Multi-agency Safeguarding Hub (MASH) by following the instructions provided on the website: <http://www.oxfordshire.gov.uk/mash>.
- Ensure that detailed and accurate written records of concerns about a child are made by staff and kept even if there is no need to make an immediate referral – see Appendix II.
- Ensure that all such records are kept confidentially and securely.

- Ensure that the designated safeguarding lead member of staff, or another appropriate member of staff, attends relevant case conferences, family support meetings, core groups, or other multi-agency planning meetings, contributes to the Framework for Assessments process, and provides a report which has been shared with the parents.
- Establish and maintain links with relevant agencies and co-operate as required with enquiries of a child protection nature.
- Ensure that staff are aware of the safeguarding and child protection policy and procedures, and understand their responsibilities in being alert to, and acting appropriately in cases of, abuse, or suspected abuse, and know how to recognise and refer any concerns.
- Ensure that staff keep themselves up to date with knowledge to enable them to fulfil their role, including attending relevant training provided by or approved by the OSCB.
- Ensure that staff understand that there is a procedure to be followed in dealing with child protection allegations made against staff. This procedure must be followed on all occasions. Staff must be made aware of this process and how it differs from other concerns about children.
- Ensure that we have staff on all interview panels who are safer recruitment trained.
- Ensure that staff are selected and recruited only after having gone through appropriate checks.
- Our setting will have regard to our obligations to prevent our students from being drawn into extremism or terrorism. We recognise that this is our statutory duty under the Counter Terrorism and Security Act 2015.

Supporting Children

We recognise that a child who is abused, who witnesses violence or who lives in a violent environment may feel helpless and humiliated, may blame him or herself, and find it difficult to develop and maintain a sense of self-worth. We also accept that research shows that the behaviour of a child in these circumstances may range from that which is perceived to be normal to aggressive or withdrawn. Greene's also acknowledges that victims of abuse may not be able to, nor know how to, articulate their experience to staff.

Greene's will support all children and young people by:

- encouraging the development of self-esteem and resilience;
- promoting a caring, safe and positive environment;
- liaising and working together with other support services and agencies involved in the safeguarding of children;

- notifying Social Care as soon as there is a significant concern and/or when a child attending Greene's is privately fostered;
- providing continuing support to a student, about whom there have been concerns, who leaves Greene's by ensuring that such concerns and any records are forwarded under confidential cover to the designated person at the student's new school immediately;
- promoting a sense of readiness amongst staff so that they are empowered to address any concerns that might be raised and so that they are aware of some of the signs of abuse that victims may not be able to outwardly express.

Confidentiality

We recognise that all matters relating to child protection are confidential. The designated safeguarding lead member of staff will disclose personal information about a child or young person to other members of staff on a need-to-know basis only. However, all staff must be aware that they and Greene's have a professional responsibility to share information with other agencies in order to safeguard children.

All staff must be aware that they cannot promise a child to keep secrets which might compromise the child's safety or well-being or that of another.

We undertake to share our intention to refer a child to the local authority children's social care agencies, with their parents or carers unless to do so could put the child at greater risk of harm, or impede a criminal investigation. If in doubt, we will consult with OSCB.

We will undertake no names consultations with OSCB to discuss concerns we may have, but we understand that if OSCB or another statutory agency then asks for a name we will disclose those details and it will become a referral.

Staff support

We recognise that staff working at Greene's who have become involved with a child who has suffered harm, or appears to be likely to suffer harm, may find the situation stressful and upsetting.

We will support such staff by providing an opportunity to talk through their anxieties with the designated safeguarding lead member of staff and to seek further support.

In consultation with all staff, we have adopted a code of conduct for staff at Greene's that forms part of their induction. We understand that staff should have access to advice on the boundaries of appropriate behaviour.

We also recognise that the designated safeguarding lead member of staff should have access to support and appropriate workshops, courses or meetings as organised by OSCB.

Allegations against staff

All staff should take care not to place themselves in a vulnerable position with a child, and should take note of the additional factors which arise from one-to-one tutorial teaching.

We understand that a child or young person may make an allegation against a member of staff. If such an allegation is made, the member of staff receiving the allegation will immediately inform the Designated Lead or the most senior member of staff available. Who will, on all such occasions, discuss the content of the allegation with the LADO (Local Authority Designated Officer) or Safeguarding Team **before taking any action.**

With regard to Greene's, contact should be made with:

Jo Lloyd
LADO and Safeguarding Coordinator Tel: 01865 810603
LADO.SafeguardingChildren@oxfordshire.gov.uk

Suspension of the member of staff against whom an allegation has been made needs careful consideration, and we will consult with above named professionals in making this decision.

Whistleblowing

We recognise that children cannot be expected to raise concerns in an environment where staff fail to do so. Staff should be aware of their duty to raise concerns about the attitude or actions of colleagues. Appropriate advice will be sought from the LADO or Safeguarding Team where necessary.

Anti-Bullying

Our policy on the prevention and management of bullying is set out in a separate policy and acknowledges that to allow or condone bullying may lead to consideration under safeguarding child protection procedures.

Health & Safety

Our Health & Safety policy, set out in a separate document, reflects the consideration we give to the protection of children both physically within the school environment and, for example, in relation to internet use, and when away from Greene's when undertaking trips and visits.

Online Safety

Our policy on the safe and responsible use of digital technology and the internet is set out in a separate Online Safety policy. Greene's acknowledges that online safety is an important element of safeguarding child protection procedures.

Safeguarding Online

As a number of students at Greene's take their courses through the College's digital platforms, we are committed to ensuring that all measures are taken to maintain the highest levels of safeguarding while online.

(I) Attendance monitoring

Greene's will continue to monitor student attendance to their online tutorials in the same manner, and with the same rigour, as with face-to-face tuition. Tutors will continue to inform the Academic Administrator within five minutes of a tutorial starting if a student has not arrived in the virtual room. Students aged 16+ will then be contacted by a member of college staff. The parents / guardians of students under 16 years old, who are recorded as absent, will be contacted immediately.

(II) Reporting a concern

Where a member of staff, or a tutor, has a concern about a student, they should continue to follow the process outlined in the college's Safeguarding and Child Protection Policy. This includes writing a Record of Concern and e-mailing it directly to the DSL. Where possible, this should be followed up with a telephone call to confirm the report has been received and then deleted from the sender's computer.

Staff are reminded of the need to report any concern immediately and without delay.

Where staff or tutors are concerned about any inappropriate online behaviour, such as requests for contact via social media, sharing images etc, they should continue to follow our normal procedures and alert the DSL immediately. The DSL will follow normal allegation management procedures as detailed in Keeping Children Safe in Education and liaise with Oxfordshire's Local Authority Designated Officer team as per our full safeguarding policy.

Any concerns involving the College Principal should be directed to the Chair and the Vice Chair of the Board of Governors.

(III) Students and online safety

It is important that all staff and tutors who interact with our students online continue to look out for signs that a student may be at risk and, where appropriate, referrals should still be made to children's social care and, as required, the police.

The College will ensure any use of online learning tools and systems is in line with privacy and data protection/GDPR requirements.

Below are some things to consider when delivering virtual lessons, especially where webcams are involved:

- Tutors and students must wear appropriate clothing
- All online tutorials must be conducted via the secure platform Zoom. If there are any technical issues experienced with this, tutors should contact the College for advice before moving to any other video conferencing provider;
- Any computers should be based in appropriate areas, and where possible, not in bedrooms. The background can be obscured using Zoom virtual backdrops;
- All students and tutors must keep their computer cameras switched on for the duration of the tutorial so that they can be seen for the entire session.

Safeguarding & child protection staff procedures

Principles

Staff have a responsibility for action in cases of suspected child abuse. This document outlines the procedures which should be followed if any member of staff suspects a child is being abused, or a child makes a disclosure. It should be read and used together with the safeguarding and child protection Code of Conduct. Appendix II provides additional information on recording and reporting of child abuse information and includes a template Record of Concern form.

Staff are asked to be alert to possible physical or emotional problems being experienced by children.

Immediate action is required where there is concern about possible abuse; written records must be made at each stage of the process.

Categories of Abuse

The four main categories of abuse are outlined below. Staff should be aware that the possible indicators are not definitive and that some children may present these behaviours for reasons other than abuse.

Types of abuse

Abuse, neglect and exploitation are forms 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 a stranger, for example via the internet. They may be abused by an adult or adults, or another child or children. There are four categories of abuse but it is often the case that more than one category is present at the same time. Some level of emotional abuse is involved in all types of maltreatment of a child, though it may occur alone.

Usually when abuse happens, children show changes in behaviour or physical signs, and quite often become withdrawn to some degree. However, this is not always the case. It is important to remember that the abuser is likely to make sure that the child has a story to tell, and children who are afraid will try not to raise any suspicions.

The four main categories of abuse are described below.

1. Physical abuse

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

The signs of physical abuse can be the appearance of multiple bruises in clusters - often on the upper arm or outside of the thigh, cigarette burns, human bite marks, broken bones, scalds – often with upward splash marks and multiple burns with a clearly demarcated edge.

Children suffering from physical abuse may show changes in behaviour characterised by a fear of adults who being approached for an explanation, aggression or severe temper outbursts, flinching when approached or touched, a reluctance to get changed - for example in hot weather, signs of depression and of being withdrawn.

2. Emotional abuse

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve:

- conveying to children that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person;
- not giving the child opportunities to express their views, deliberately silencing them, or 'making fun' of what they say or how they communicate;
- imposing expectations that are inappropriate to a child's age or stage of development which may also include overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction;
- seeing or hearing the ill-treatment of another child; and
- serious bullying (including via the internet), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children.

Emotional abuse can be difficult to measure, as there are often no outward physical signs. Children who appear well-cared for may nevertheless be emotionally abused by being taunted, put down, or belittled. They may receive little or no love, affection, or attention from their parents. Emotional abuse can also take the form of children not being allowed to mix with other children.

Bullying can be a form of physical abuse but is most often emotional abuse. Children may encounter emotional abuse through bullying that is:

- verbal: name-calling, sarcasm, spreading rumours, persistent teasing;

- emotional: excluding, tormenting, ridiculing, humiliating.

Persistent bullying can result in: depression, low self-esteem, shyness, poor academic achievement, isolation and threatened or attempted suicide.

3. Sexual abuse

Sexual abuse involves forcing or enticing a child to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. Such activities need not involve contact and may include, for example, 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).

Usually, in cases of sexual abuse it is the child's behaviour that may cause concern, although physical signs can also be present. In all cases, children who tell about sexual abuse do so because they want it to stop. It is important, therefore, that they are listened to and taken seriously.

It is also important to remember that it not just adult men who sexually abuse children – there are increasing numbers of allegations of sexual abuse of children against women and sexual abuse can also be perpetrated by other children.

4. Neglect

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs and is likely to result in the serious impairment of the child's health or development.

Neglect may involve a parent failing to:

- provide adequate food, clothing and shelter;
- protect a child from physical and emotional harm or danger;
- ensure adequate supervision;
- ensure access to appropriate medical care or treatment; and
- respond to a child's emotional needs.

Neglect can be a difficult form of abuse to recognise, yet can have some of the most lasting and damaging effects on children. Concern about a child should be raised if:

- injuries are apparent which is not typical of the bumps and scrapes normally associated with accidental injuries;
- a child gives confusing or conflicting explanations about how injuries were sustained – including disclosure of an experience in which he or she may have been significantly harmed;

- a child shows significant changes in behaviour, performance or attitude; and
- a child indulges in sexual behaviour which is unusually explicit and/or inappropriate to his or her age/stage of development.

Please note

These definitions and indicators of the main categories of abuse are not definitive but serve as a guide to assist students, parents and tutors at Greene's. It is important to also remember that many children may exhibit some of the indicators of abuse at some time, and that the presence of one or more should not be taken as proof that abuse is occurring. There may well be other reasons for changes in behaviour such as a death or the birth of a new baby in the family or relationship problems between students and their parents or with other children. In assessing whether indicators are related to abuse or not they should be considered in relation to the child's overall development and context.

Specific safeguarding issues

All staff have an awareness of safeguarding issues - some of which are listed below. Staff are made aware that behaviours linked to the likes of drug taking, alcohol abuse, truanting and sexting put children in danger.

- bullying including cyber bullying
- children missing education
- child missing from home or care
- child sexual exploitation (CSE)
- domestic violence
- fabricated or induced illness
- faith abuse
- female genital mutilation (FGM)
- forced marriage and honour-based violence:
- gangs and youth violence
- gender-based violence/violence against women and girls (VAWG):
- hate
- homophobic, biphobic and transphobic bullying
- mental health
- missing children and adults strategy
- online safety
- private fostering
- preventing radicalisation
- relationship abuse
- substance misuse

- sexting and the sending of nude and semi-nude images
- trafficking

Allegations of abuse made against other children (peer on peer abuse)

Staff are made aware that safeguarding issues can manifest themselves via peer on peer abuse. This is most likely to include, but not limited to: bullying (including cyber bullying), gender based violence/sexual assaults and sexting. Staff are made clear of our policy and procedures with regards to peer on peer abuse.

In a situation where child abuse is alleged to have been carried out by another child, our child protection procedures should be adhered to for both the victim and the alleged abuser; this means it should be considered as a child care and protection issue for both children.

Peer on peer abuse can take many forms, and gender issues can be prevalent when dealing with this type of abuse. Instance of abuse could include, for example:

- bullying (including cyberbullying, prejudice-based and discriminatory bullying); abuse in intimate personal relationships between peers;
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse);
- sexual violence, such as rape, assault by penetration and sexual assault; (this may include an online element which facilitates, threatens and/or encourages sexual violence);
- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse;
- 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;
- consensual and non-consensual sharing of nudes and semi nudes images and or videos (also known as sexting or youth produced sexual imagery);
- upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm; and
- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

Staff are made aware that victims of peer on peer abuse should be taken seriously, kept safe, and not made to feel as if they are creating a problem by raising a concern of abuse, sexual violence or sexual harassment to the staff member.

Procedural principles

At Greene's we continue to ensure that any form of abuse or harmful behaviour is dealt with immediately to reduce the extent of harm to the young person, with full consideration to impact on that individual child's emotional and mental health and well-being. We advise staff to:

1. **Gather the Facts** - Speak to all the young people involved separately, gain a statement of facts from them and use consistent language and open questions for each account.
2. **Consider the Intent (begin to assess risk)** - Has this been a deliberate or contrived situation for a young person to be able to harm another?
3. **Decide on the next course of action** - If, from the information that you gather you believe any young person to be at risk of significant harm, you must make a safeguarding referral to social care immediately (where a crime has been committed the police should be involved also). If this is the case, once social care has been contacted and have made a decision on what will happen next, then you will be informed on your next steps. If social care and the police intend to pursue this further, they may ask to interview the young people in school or they may ask for parents to come to school to be spoken to also. It is important to be prepared for every situation and the potential time it may take. It may also be that social care feel that it does not meet their criteria in which case you may challenge that decision, with that individual or their line manager. If on discussion however, you agree with the decision, you may then be left to inform parents.
4. **Informing parents** - If, once appropriate advice has been sought from police/social care you have agreement to inform parents or have been allocated that role from the other services involved, then you need to inform the parents as soon as possible. In all circumstances where the risk of harm to the child is evident, then the college should encourage the young person to share the information with their parent or even with them (they may be scared to tell parents that they are being harmed in any way). Where the college can evidence they are acting in the best interests of the young person they would not be criticised, however this would be the case if they actively breached the rights and choices of the young person. The best way

to inform parents is in person as nature of the incident and the type of harm/abuse a young person may be suffering can cause fear and anxiety to parents whether their child is the child who was harmed or who harmed another.

5. **For the young person who has been harmed** - What support they require depends on the individual young person. It may be that they wish to seek counselling or one to one support via a mentor. It may also be that they feel able to deal with the incident(s) on their own or with support of family and friends. In which case it is necessary that this young person continues to be monitored and offered support should they require it in the future. If the incidents are of a bullying nature, the young person may need support in improving peer groups/relationships with other young people. Other interventions that could be considered may target a whole year group, for example a speaker on cyber bullying, relationship abuse etc. If the young person feels particularly vulnerable it may be that a risk assessment can be put in place for them whilst in school so that they have someone named that they can talk to, support strategies for managing future issues and identified services to offer additional support.

6. **For the young person who has displayed harmful behaviour** - In this circumstance it is important to find out why the young person has behaved in such a way. It may be that the young person is experiencing their own difficulties and may even have been harmed themselves in a similar way. In such cases support such as one to one mentoring or counselling may also be necessary. Particular support from identified services may be necessary through a CAF/strengthening families/early help referral and the young person may require additional support from family members.

Once the support required to meet the individual needs of the young person has been met, it is important that young person receives a consequence for their behaviour. This may be in the form of restorative justice e.g. making amends with the young person they have targeted if this has been some form of bullying. In the cases of sexually harmful behaviour it may be a requirement for the young person to engage in one to one work with a particular service or agency (if a crime has been committed this may be through the police or youth offending service). If there is any form of criminal investigation ongoing it may be that this young person cannot be educated on site until the investigation has concluded. In this case, the young person will need to be provided with appropriate support and education whilst off site.

Even following the conclusion of any investigation the behaviour that the young person has displayed may continue to pose a risk to others in which case an individual risk assessment may be required. This should be completed via a multiagency response to ensure that the needs of the young person and the risks towards others are measured by all of those agencies involved including the young person and their parents. This may mean additional supervision of the young person or protective strategies if the young person feels at risk of engaging in further inappropriate or harmful behaviour.

7. **After care** - It is important that following the incident the young people involved continue to feel supported and receive help, even if they have stated that they are managing the incident. Sometimes the feelings of remorse, regret or unhappiness may occur at a much later stage than the incident. It is important to ensure that the young people do not engage in any further harmful behaviour either towards someone else or to themselves as a way of coping (e.g. self-harm). In which case, regular reviews with the young people following the incident(s) are imperative.

Child sexual exploitation (CSE)

The sexual exploitation of children involves exploitative situations, contexts and relationships where they receive something such as food, accommodation, drugs, alcohol, cigarettes, affections, gifts, money as a result of them performing and/or others performing on them, sexual activities. Child sexual exploitation can occur through the use of technology without the child's immediate recognition; for example being persuaded to post sexual images on the internet or mobile phones without immediate payment or gain. In all cases those exploiting the child have power over them by virtue of their age, gender, intellect, physical strength and/or economic or other resources. Violence, coercion and/or intimidation are common in exploitative relationships being characterised in the main by the child's limited availability of choice, resulting from their social, economic and/or emotional vulnerability.

Sexual exploitation affects both girls and boys and can happen in all communities. Any person can be targeted but children who feel isolated are particularly vulnerable. Sexual violence or abuse against children represents a major public health and social welfare problem within UK society, affecting 16% of children under 16. That is approximately 2 million children.

Child criminal exploitation (CCE)

Some specific forms of CCE can include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting or pickpocketing. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others.

Children can become trapped by this type of exploitation as perpetrators can threaten victims (and their families) with violence, or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others. As children involved in criminal exploitation often commit crimes themselves, their vulnerability as victims is not always recognised by adults and professionals, (particularly older children), and they are not treated as victims despite the harm they have experienced. They may still have been criminally exploited even if the activity appears to be something they have agreed or consented to.

It is important to note that the experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however professionals should be aware that girls are at risk of criminal exploitation too. It is also important to note that both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

Domestic Abuse

Domestic abuse is defined across Government as any incident of controlling, coercive or threatening behaviour, violence or abuse between those aged 16 or over who are or have been intimate partners or family members, regardless of their gender or sexuality. This includes, but is not limited to, psychological, physical, sexual, financial or emotional abuse. Controlling and coercive behaviours are often at the core of domestic abuse.

Controlling behaviour is: a range of acts designed to make a person subordinate and/or dependant by isolating them from sources of support, exploiting their resources and capacities for personal gain, depriving them of the means needed for independence, resistance and escape and regulating their everyday behaviour.

Coercive behaviour is: an act or a pattern of acts of assaults, threats, humiliation and intimidation or other abuse that is used to harm, punish, or frighten their victim.

Children and young people may

- Experience domestic abuse in a current or former family relationship / home

- Experience or use abusive behaviours in their own intimate relationships (all cases, including those under 16 years old, should follow the [Oxfordshire Domestic Abuse Pathway for Young People](#) and the [Young People DASH RIC](#) with guidance)
- Use abusive behaviours towards their parents, known as child on parent violence

Good practice – Individuals

- Recognise the symptoms and categorise the form(s) of abuse.
- Treat the child as a victim of abuse.
- Listen to the child and note the child's words.
- Understand the perspective and behaviour of the child and be patient with them.
- Help the child or young person to recognise that they are being exploited.
- Ensure the child understands that the information they are telling you may not be considered confidential and may need to be shared with statutory agencies.
- Seek only to gather facts - do not investigate.
- Collate and record as much information as relevant.
- Report information to the designated safeguarding lead member of staff.

Good practice – Organisations

- Ensure robust safeguarding policies and procedures are in place which cover CSE.
- Ensure safeguarding policies and procedures are reviewed regularly.
- Ensure staff complete adequate and relevant safeguarding training on joining Greene's and from time to time.
- Participate in multi-agency working to prevent abuse and as required.
- Work to help victims move out of exploitation.
- Cooperate to enable successful investigations and prosecutions of perpetrators.

Forced Marriage

Forced Marriage is a specific offence under section 121 of the Anti-Social Behaviour, Crime and Policing Act 2014 that came into force on 16 June 2014.

A forced marriage is a marriage conducted without the valid consent of one or both parties, and where duress is a factor. Forced marriage is when someone faces physical pressure to marry (e.g. threats, physical violence or sexual violence) or emotional and psychological pressure (e.g. if someone is made to feel like they're bringing shame on

their family). This is very different to an arranged marriage where both parties give consent.

Forced marriage is illegal in England and Wales. This includes:

- taking someone overseas to force them to marry (whether or not the forced marriage takes place)
- marrying someone who lacks the mental capacity to consent to the marriage (whether
- they are pressured to or not)

Female genital mutilation (FGM)

FGM is child abuse and a form of violence against women and girls, and is part of these safeguarding policy and procedures. FGM is illegal under the Female Genital Mutilation Act 2003.

Other than in the excepted circumstances, it is an offence for any person (regardless of their nationality or residence status) to:

- perform FGM (section 1 of the Act);
- assist a girl to carry out FGM on herself (section 2 of the Act); and
- Assist a non-UK person to carry out FGM outside the UK on a UK national or permanent UK resident (section 3 of the Act).

Homophobic, bi-phobic and transphobic bullying (including guidance on gender questioning children)

Greene's believes that it is essential for all students, regardless of sexual orientation or gender identity, to feel safe and welcome within their educational environment. Greene's is proud to foster an open and diverse student, tutor and staff community in which everyone is free to express themselves without fear of prejudice or exclusion.

We acknowledge that a child or young person being lesbian, gay, or bisexual is not in itself an inherent risk factor for harm, but that they can sometimes be targeted by other children. In some cases, a child who is perceived by other children to be lesbian, gay, or bisexual (whether they are or not) can be just as vulnerable as children who are. Greene's does not tolerate bullying of any kind and the College works closely with student representatives to ensure that all members of the community share in responsibility to identify and resolve cases of bullying with care and sensitivity.

In line with KCSIE, we acknowledge that the Cass review identified that caution is necessary for children questioning their gender as there remain many unknowns about the impact of social transition and children may well have wider vulnerabilities, including having complex mental health and psychosocial needs, and in some cases

additional diagnoses of autism spectrum disorder and/or attention deficit hyperactivity disorder. When supporting a gender questioning child, schools should take a cautious approach and consider the broad range of their individual needs, in partnership with the child's parents (other than in the exceptionally rare circumstances where involving parents would constitute a significant risk of harm to the child), including any clinical advice that is available and how to address wider vulnerabilities such as the risk of bullying.

Similarly, we acknowledge that risks can be compounded where children lack trusted adults with whom they can be open. It is therefore vital that staff endeavour to reduce the additional barriers faced and create a culture where they can speak out or share their concerns with members of staff.

Honour-based violence (HBV)

So-called 'honour based violence' is a fundamental abuse of Human Rights. There is no honour in the commission of murder, kidnap and the many other acts, behaviour and conduct which make up violence in the name of honour. The term honour based violence (HBV) will be used as it is a recognised term describing cultural motivation for violence and abuse.

Honour based violence is a collection of practices, which are used to control behaviour and exert power within families to protect perceived cultural and religious beliefs and/or honour. Such violence can occur when perpetrators perceive that an individual has shamed the family and/or community by breaking their honour code.

Honour based violence cuts across many cultures and communities, and cases encountered in the UK have involved families from Turkish, Kurdish, Afghani, South Asian, African, Middle Eastern, South and Eastern European communities. This is not an exhaustive list.

Preventing radicalization

Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism. Protecting those vulnerable to extremism is a safeguarding issue. From 1st July 2015 Greene's is subject to a duty under section 26 of the Counter Terrorism & Security Act 2015 to have "due regard to the need to prevent people from being drawn into terrorism". This duty is known as the "Prevent" duty.

Greene's raises awareness amongst students and staff with regard to risks and behaviours associated being drawn into terrorism. Staff should be alert to changes in children's behaviour which could indicate that they may be in need of help or protection.

Possible indicators are:

- Withdrawal from usual activities
- Feelings of anger, grievance or injustice
- Unexplained absenteeism
- Expressing 'them' and 'us' thinking
- Use of inappropriate language
- Advocating violence
- Expression of extremist views
- Association with known extremists – including online
- Seeking to influence or recruit others to an extremist ideology

Any concerns should be raised by following the safeguarding procedures in this document – discuss the concern with the Designated Safeguarding Lead. If appropriate, a referral to the Channel programme will be made. Channel is a voluntary programme which focuses on providing support at an early stage to people identified as being vulnerable to being drawn into terrorism.

We demonstrate that we are protecting children and young people from being drawn into terrorism by having robust safeguarding policies; and ensure that our safeguarding arrangements take into account the policies and procedures of the OSCB.

We also make sure that staff have training that gives them the knowledge and confidence to identify children at risk of being drawn into terrorism, and to challenge extremist ideas which can be used to legitimise terrorism. This includes introducing measures to ensure children from terrorist and extremist material when accessing the internet at Greene's.

Student Mental Health

Greene's ensures that all staff are 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.

We recognise that only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Education 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. We acknowledge that it is key that staff are aware of how these children's experiences, can impact on their mental health, behaviour, and education.

Dealing with Disclosures

Receive

Always stop and listen straight away to someone who wants to tell you about incidents or suspicions of abuse. Find a quiet place - listen quietly and actively, giving your undivided attention. Allow silences when needed. Do not show shock or disbelief but take what is said seriously. Take notes, being careful to write down the child's words and not an interpretation.

Reassure

Stay calm; no judgements; empathise. Never make a promise that you can keep what a child has said a secret. Give reassurance that only those who need to know will be told. Reassure the young person that they were right to tell you.

React

React to the child only as far as is necessary for you to establish whether or not you need to refer the matter to the designated safeguarding lead member of staff, but don't interrogate for full details.

Do not ask leading questions – keep the questions open e.g. 'Is there anything else you want to say?'

Do not criticise the perpetrator; the student may have affection for him or her. Explain that you will need to inform the designated safeguarding lead.

Record

In preference and if possible, make notes about what the child is actually telling you at the time – use the child's own words. Keep these notes, however rough they are. If you are unable to make notes at the time write down what was said as soon as you can.

Try to record what was actually said by the student rather than your interpretation of what they are telling you. You are primarily recording a statement; you may add opinion as observation but not as interpretation – such as a comment on the child's behaviour: 'When John came to see me he was very upset.'

Use the Record of Concern form, record the date, time, place and any noticeable non-verbal behaviour.

Report

Report the incident to the to the designated safeguarding lead member of staff and do not tell any other adults or students what you have been told.

Never attempt to carry out an investigation of suspected abuse by interviewing the child or any others involved. This is a skilled role and any attempts by you could affect possible criminal proceedings.

Record Keeping

The designated safeguarding lead is responsible for ensuring that the necessary paperwork is completed and sent to the relevant people/agencies and stored in a safe and confidential place.

Appendix I – Role of the designated safeguarding lead

The Governing Body of Greene’s Tutorial College has designated the Deputy Principal to take lead responsibility for safeguarding and child protection. The broad areas of responsibility for the designated safeguarding lead are:

Managing referrals

Refer all cases of suspected abuse to the local authority children’s social care agencies and:

- the Designated Lead concerning all cases which concern a staff member; and/or
- the Chair and the Vice Chair of the Board of Governors concerning all cases which concern the College Principal and/or
- Disclosure and Barring Service concerning cases where a person is dismissed or left due to risk/harm to a child; and/or
- Police concerning cases where a crime may have been committed.
- Act as a source of support, advice and expertise to staff on matters of safeguarding and when deciding whether to make a referral by liaising with relevant agencies – especially the OSCB.

Training

The DSL should receive appropriate training every two years in order to:

- Understand the assessment process for providing early help and intervention, for example through locally agreed common and shared assessment processes.
- Have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so.
- Ensure each member of staff has access to and understands the Greene’s Safeguarding and Child Protection Policy and procedures, especially new and part time staff.
- Be alert to the specific needs of children in need, those with special educational needs and young carers.
- Be able to keep detailed, accurate, secure written records of concerns and referrals.
- Obtain access to resources and attend any relevant or refresher training courses.
- Encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the school or college may put in place to protect them.

Raising Awareness

The designated safeguarding lead should ensure the college's policies are known and used appropriately:

- Ensure the Greene's Safeguarding and Child Protection Policy is reviewed annually and
- the procedures and implementation are updated and reviewed regularly, and work with the college Principal regarding this.
- Ensure the child protection policy is available publicly and parents are aware of the fact that referrals about suspected abuse or neglect may be made and the role of Greene's.
- Link with the OSCB to make sure staff are aware of training opportunities and the latest local policies on safeguarding.
- Where children leave Greene's to go to another school or college ensure their child protection file is transferred independently of other reports and securely to the new school or college as soon as possible.

Appendix II – Keeping records and reporting concerns

Good record keeping is essential in safeguarding the welfare of children

How should notes and reports be made?

It is impossible to say, at the time of making a child protection report, who will eventually have access to it, or when. It may be consulted months or even years after it was written. Always bear in mind that someone who is a complete stranger to you and Greene's may need to read your record at some stage in the future.

Ideally, reports should be typed. If hand written, reports should be clearly legible and written in ink. All reports must contain the following:

- Date of the incident
- Date and time of the report being made
- Name(s) and date(s) of birth of the child(ren) concerned
- A factual account of what happened, and the location where the incident took place (include the actual words spoken by the child where possible)
- A note of any other people involved e.g. as witnesses
- Action taken, and any future plans e.g. monitor and review
- Any other agencies informed: names, dates, times of anyone spoken to
- Printed name and signature of the person making the record
- Job title of the person making the record

The source of the information should be identified e.g. 'Mrs Bell, a midday supervisor, informed me that...' Or 'I saw John in the playground at breaktime....'

Information should be factual or based on fact. Record what you saw, heard etc. and try not to be vague or woolly (e.g. 'Jenny was crying and rocking' rather than 'Jenny was upset')

Opinion is acceptable provided that you can give some justification for holding it (e.g. 'Sam ran and hid under the table when his mother arrived to take him home and clung to me when I tried to get him out. He appeared to be frightened.')

Make a note of what you have done with the information (e.g. 'I consulted the Academic Director and he said he would...')

Try to avoid vague and/or specialist jargon (e.g. 'the tutor's slip reported that...') that someone from another agency would not necessarily understand.

Any member of staff who has a concern about a child should make a written report using the 'record of concern' template and following the guidelines above. The report should be passed to the Designated Safeguarding Lead, or Deputy in DSL's absence, for storage and any appropriate action.

Notes must be made as soon as possible and certainly within 24 hours of the incident giving rise to the concern.

If a referral is made to the Oxfordshire Assessment Team or Thames Valley Police, Child Abuse Investigation Unit these written reports will be sent and copies kept by Greene's.

Where should child protection information be kept?

The child protection file should contain all reports, notes and a record of correspondence referring to a child. This should be kept in one secure place by the Designated Safeguarding Lead. Files on extended family members are kept together.

All members of the College's wider safeguarding team should be aware that a child protection file exists relating to the child. These files should be reviewed in the regular meetings of the safeguarding team. Staff who need to consult the student's profile should consult the Designated Safeguarding Lead.

Who should have access to child protection information?

Access to child protection information should be on a need-to-know basis among staff. This can only be decided on a case-by-case basis. The confidentiality of the child and family should be respected as far as possible, but the welfare of the child is paramount. It would be unlikely that every member of staff would need to know the full details of a case. Generally speaking, the closer the day-to-day contact with the child, the more likely staff need to know an outline of the case.

Where a case is being referred and a report being made to a child protection conference it will include information from the child protection file in question and should be shared with the parent(s) before the conference takes place. Information from a child protection file must be shared with a Social Worker and/or Police, as appropriate, where there is concern that a child is at risk of significant harm.

Child protection information should not ordinarily be shared with agencies other than statutory agencies e.g. information should not be released to solicitors, etc. Where such a request is made, it is best to seek further advice and guidance on this from OSCB.

Child Protection records can be kept on computer and are exempt from the disclosure provisions of the Data Protection Act 2018 For manual records, the Education (School Records) Regulations 1989 exempt information relating to child abuse from the requirement of disclosure. However, in cases of alleged child abuse which come to court, Greene's may be required to provide its child protection records.

What should happen to the information when a child leaves the school / How long should information be kept?

If the child is moving to another school or college, the complete child protection file should be sent, under separate cover from the regular school file. It should be marked 'Confidential, Addressee Only', and should go to the Head Teacher of the receiving school. All relevant information including 'nagging doubts' should be shared.

Where a pupil leaves with no further education place identified, the file should be retained at the school until the child's 25th birthday.

Information of a child protection nature relating to an allegation against a member of staff, including where the allegation is unfounded, should be kept until the staff member's normal retirement age or 10 years from the date of the allegation if that is longer.

Sharing Information with other Schools/Agencies

Conversations between designated personnel at different schools (e.g. sharing concerns or asking for information about sibling groups) are perfectly acceptable. Where possible, consent from parents should be sought before a conversation takes place. Any relevant child protection information coming to light should be carefully recorded.

Low Level Concerns

Staff should be aware that a low-level concern is one that does not meet the harm threshold as stated in the College's Safeguarding. 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' (i.e. they believe it could be a concern) – that an adult working in or on behalf of the College may have acted in a way that:

- Is inconsistent with the Staff Code of Conduct, including inappropriate conduct outside of work;
- 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 on their mobile phone;
- Engaging with a child on a one-to-one basis in a secluded area or behind a closed door; or,
- Using inappropriate sexualised, intimidating or offensive language. Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate, but might not be in specific circumstances, through to that which ultimately intended to enable abuse.

It is very important that low level concerns are shared, to embed a culture of openness, and transparency in which the expected behaviour set out in the Staff Code of Conduct is lived and reinforced by all staff. This should also protect staff from potential false allegations or misunderstandings.

Staff must record all low-level concerns in writing (this may be done over e-mail). The DSL will securely retain confidential files on low-level concerns.

The record should include details of the concern, the context in which the concern arose and the action taken.

The name of the individual sharing their concerns should also be noted, though if the individual wishes to remain anonymous then that will be respected as far as reasonably possible.

The Principal should ultimately be informed of all low-level concerns and make the final decision on how to respond. Where appropriate this can be done in consultation with the DSL.

Record of Concern

Name of child:	Date of birth:						
Date of incident:	Date of report:						
<p>Nature of Concern:</p> <p>What prompted this record? (Please include dates, times, incidents, behaviours)</p>							
<p>Background:</p> <p>(Information that could explain child's behaviour)</p>							
<p>Does the concern fall into one of the following categories?</p> <table style="width: 100%; border: none;"> <tr> <td style="width: 50%;">Neglect</td> <td style="width: 50%;">Sexual</td> </tr> <tr> <td>Abuse</td> <td></td> </tr> <tr> <td>Physical Abuse</td> <td>Emotional Abuse</td> </tr> </table>		Neglect	Sexual	Abuse		Physical Abuse	Emotional Abuse
Neglect	Sexual						
Abuse							
Physical Abuse	Emotional Abuse						
Signed _____	Signed _____						
Name _____	Name _____						
(printed)	(printed)						
(Member of staff)	Designated Safeguarding Lead						
<p>Has this information been passed to any other agencies? (Please give details) If not, please record reasons why:</p>							