GREENE'S COLLEGE OXFORD

Safeguarding and Child Protection Policy

This policy was adopted in August 2026.

This policy is due to be reviewed in August 2027.

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.

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PART ONE – SAFEGUARDING PRINCIPLES

I. Introduction

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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 2026)
- *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 Partnership (OSCP)

The directors and senior management of Greene's take seriously their responsibilities and duties under the relevant sections of the 1989 and 2004 Children Act. We recognise our duties as required by the Schedule to the Education (Independent Schools Standards) Regulations 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 the accompanying procedures) will apply 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.

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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
- 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.

II. Safeguarding in action

At Greene's we will ensure that

- We have a Designated Safeguarding Lead (DSL) and several deputies who have undertaken appropriate training for the role within the past two years. Our Designated Safeguarding Lead is the Academic Director, Grant Connor (grant.connor@greenes.org.uk, 01865 664430). In his absence, the Head of Science, Rowena Fletcher-Woof

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(rowena.fletcherwood@greenes.org.uk; 01865 664445, and the Academic Administrator, Samira Yaghoobi (reception@greenes.org.uk; 01865 664444), both hold current Level 3 Designated Safeguarding Lead training and act as deputy DSLs

- 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:

  - This Safeguarding and Child Protection policy
  - The Staff Code of Conduct
  - The role of the DSL
  - Keeping Children Safe in Education Part 1
  - The process for managing allegations about staff or volunteers
  - Handling low-level concerns
  - What to do if they have a concern about a child
  - Core areas of concern in the safeguarding of children and young people

- 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 young person 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 OSCP
- Our safeguarding and child protection policy and procedures will be annually reviewed and up-dated as required

III. Responsibilities

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

We will therefore

- Ensure that all staff appropriately share any welfare concerns that they may have about children

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- 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 section below on what to include in a referral
- Ensure that all such records are kept confidentially and securely
- Ensure that the DSL, 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 OSCP
- 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

IV. 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 themselves, 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

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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.

V. Confidentiality

We recognise that all matters relating to child protection are confidential. The DSL 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 OSCP.

We will undertake, as may be required in the situation, consultations with OSCP.

VI. 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.

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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 DSL should have access to support and appropriate workshops, courses or meetings as organised by OSCP.

VII. 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.**

The details of the current Local Authority Designated Officer are:

Jo Lloyd
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 the appropriate professionals in making this decision.

VIII. 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.

IX. Inter-policy matters

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Greene's maintains separate policies on a number of areas which touch on safeguarding and child protection, but which are not addressed in this document. Please refer to the appropriate policies for guidance.

Anti-bullying: our policy on the prevention and management of bullying acknowledges that to allow or condone bullying may lead to consideration under safeguarding child protection procedures.

Drug and drug-testing: our policy outlines the College's response to reported or suspected drug use in the College.

Health & Safety: our policy reflects the consideration we give to the protection of children both physically within the school environment and, for example, in relation to remote tuition, and when away from Greene's when undertaking trips and visits.

Off-site activity: our policy on activities outside of Greene's addresses our checks and procedure as to how best to contextualise core safeguarding principles when students, tutors and staff are no longer on College grounds.

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

X. Safeguarding in an online setting

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 taking to maintain the highest levels of safeguarding while online.

1. 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 College 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.

2. 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

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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.

3. 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:

- 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
- Tutors and students must be made aware that the College may, without warming, observe a tutorial for any reason, but especially if there is reason for concern
- There may be occasions where it is appropriate to request that online sessions be recorded so that they may be reviewed by senior staff or members of the College safeguarding team

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PART TWO – PROCEDURAL SAFEGUARDING

XI. Introductory remarks

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. The below sections provide 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.

XII. Safeguarding – Areas of Concern

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All staff have an awareness of core safeguarding themes. Below is a sampling of the areas of concern that staff are expected to be able to identify.

a. Abuse
b. Allegations of abuse against children (peer-on-peer abuse)
c. Bullying (in all forms)
d. Child criminal exploitation (CCE) and child sexual exploitation (CSE)
e. Chronic absenteeism, missing from education and/or the home
f. Domestic violence and relationship abuse
g. Female genital mutilation (FGM)
h. Forced marriage and honour-based violence
i. Gangs and youth violence
j. Grief, loss and suicide response and prevention
k. Hate
l. Homophobic, biphobic and transphobic abuse
m. Mental health issues (within the Social, Emotional and Mental Health spectrum)
n. Online safety, including dis- and misinformation and conspiracy theory
o. Preventing radicalisation

a) 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.

1. <u>Physical abuse</u>

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.

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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, 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
- 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.

Persistent bullying can result in: depression, low self-esteem, shyness, poor academic achievement, isolation and threatened or attempted suicide. Please consult the Greene's Anti-bullying policy.

3. Sexual abuse

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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
- 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
- a child indulges in sexual behaviour which is unusually explicit and/or inappropriate to his or her age/stage of development

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

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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.

b) 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. 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 childcare 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-nude images and or videos (also known as sexting or youth produced sexual imagery)

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- upskirting, which typically involves taking a picture under a person' clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm
- initiation/hazing type violence and rituals (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.

c) Bullying

Bully can come in many forms and have serious lasting impacts on the development of young people.

Greene's employs a zero-tolerance approach to bullying of any kind and undertakes to resolve all issues regarding bullying swiftly but fairly.

Greene's full policy on anti-bullying measures and responses are outline in the College's Anti-bullying policy.

d) Child criminal exploitation (CCE) and Child sexual exploitation (CSE)

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

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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.

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.

e) Chronic Absenteeism

Attending school or college is essential in allowing students the best opportunities to succeed. Greene's recognises that there could be many reasons why young people do not attend College, some of which are not themselves safeguarding concerns. However, it is important to recognise that chronic absenteeism could indicate a wider issue.

Greene's is guided by the Department for Education's *Working together to improve school attendance* (August 2024). In particular, we recognise that improving attendance is everyone's responsibility and that the foundation of improving attendance is a calm, orderly, safe and supportive environment.

The College employs a separate Attendance policy to monitor and report on student attendance. However, within a safeguarding context, it is important for staff to consider what barriers may exist that prevent or dissuade students from attending.

Chronic absenteeism could be an indicator of a number of underlying issues, including, but not limited to, issues with family members, issues in the student's domestic situation, undisclosed or unmanaged medical

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conditions, feelings of loneliness, fear or inadequacy, SEMH concerns such as depression or severe anxiety.

f) Domestic violence and relationship abuse

Domestic and relationship abuse can be characterised 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 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.

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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.

g) 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).

h) Forced marriage and honour-based violence

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)

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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.

i) Gang and youth violence

Addressing concerns arising from a young person's involvement in a gang is a multi-agency issue. Partnership working and information sharing are therefore key to safeguarding children and young people at risk of gang-related harm. Children can be put at risk by gang activity both through participation in and as victims of gang violence.

Overall, children particularly vulnerable to suffering harm in the gang context are those who are:

- Not involved in gangs, but living in an area where gangs are active, which can have a negative impact on their ability to be safe, health, enjoy and achieve, make a positive contribution and achieve economic well-being
- Not involved in gangs, but at risk of becoming victims of gangs
- Not involved in gangs but at risk of becoming drawn in, for example, siblings or children of known gang members
- Gang-involved and at risk of harm through their gang-related activities (e.g. drug supply, weapon use, sexual exploitation and risk of attack from own or rival gang members).

Victims and offenders are often the same people. When adults treat a child as just a victim or just an offender, they are not taking into account the complex, cyclical nature of the victim-offender link and the factors that influence children's lives.

A gang is defined as 'a relatively durable, predominantly street-based group of young people who see themselves (and are seen by others) as a

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discernible group; engage in criminal activity and violence; lay claim over territory (not necessarily geographical but can include an illegal economy territory); have some form of identifying structural feature; and are in conflict with other, similar, gangs.

Safeguarding should focus on children who are vulnerable to making the transition to gang involvement as well as those already involved in gangs. Practitioners should be aware of particular risks to children involved in gangs from violence and weapons; drugs and sexual exploitation

There are particular risk factors and triggers that young people experience in their lives that can lead to them becoming involved in gangs. Many of these risk factors are similar to involvement in other harmful activities such as youth offending or violent extremism.

Risk indicators may include:

- Becoming withdrawn from family
- Sudden loss of interest in school – decline in attendance or academic achievement
- Starting to use new or unknown slang words
- Holding unexplained money or possessions
- Staying out unusually late without reason;
- Sudden change in appearance – dressing in a particular style or 'uniform'
- Dropping out of positive activities
- Unexplained physical injuries
- Graffiti style tags on possessions, school books, walls
- Constantly talking about another young person who seems to have a lot of influence over them
- Broken off with old friends and hanging around with a new group
- Starting to adopt codes of group behaviour e.g. ways of talking and hand signs
- Expressing aggressive or intimidating views towards other groups of young people some of whom may have been friends in the past

j) Grief, loss and suicide response and prevention

At Greene's, we are committed to safeguarding the mental health and emotional well-being of our students. We recognise that grief, suicidal ideation and post-crisis recovery are profoundly sensitive experiences requiring structured, compassionate and proactive support.

All staff and Personal Tutors at Greene's are made aware of core principles relating to suicide prevention and intervention. This includes how to

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respond when a student discloses suicidal thoughts or emotional distress, using a trauma-informed approach. When handling such a disclosure, it is important to consider the following:

- Acknowledge the student's trust and bravery in speaking up
- Reassure the student of partnership and support
- Be transparent about next steps, ensuring student safety and appropriate referral
- Do not leave the student alone; physically escort them to designated support if necessary

Students are encouraged to speak openly with staff about any emotional difficulties. Conversations remain confidential unless there is a concern for the student's safety or the safety of others (as with all safeguarding disclosures). In such cases, staff will handle disclosures with discretion, always prioritising the student's well-being and involving appropriate safeguarding leads.

In the event of a student experiencing the death of a loved one, the College should consider engaging in the following measures:

- A "planning checklist" will guide the student's return, including reduced workload, peer support, check-in schedules and designated trusted adults
- A safe space may be made available for the student to visit when distressed
- Staff and the student's Personal Tutor should liaise with the student and family to create a supportive reintegration plan

Should the college face the death of a student, a Crisis Response Team (CRT) will activate a coordinated plan. This includes:

- Verifying information and liaising with the student's family
- Communicating sensitively with staff and students
- Providing grief support through counsellors or community leaders
- Designating spaces for emotional support and memorial activities
- Managing social media messaging and supporting students on anniversaries or difficult days
- Promoting practical coping strategies for those experiencing loss such as journaling, creative arts, mindfulness, music, prayer, and physical activity

Ultimately, Greene's seeks to foster a culture of empathy, respect and safety. We aim to ensure no student grieves or struggles alone. Communication between school, student, and family will remain open and supportive during recovery and reintegration.

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k) Hate

Although there is no statutory definition of hate, we recognise that some behaviours may be or may appear to be motivated by prejudice towards individuals on the basis of their race, religion, sexual orientation, disability, gender identity or expression. While it is important to remember not all hate incidents will amount to criminal offences, such behaviours can nonetheless feel malicious and vindictive to those experiencing them and that such behaviours might escalate to criminal offences in the future.

Hate speech targets people for who they are (their identity) or what they appear to be. Hate sends a very personal message to its victim and reinforces long-established patterns of discrimination and prejudice against certain communities and groups of people.

As an institution, Greene's encourages lively, open and honest discourse within its students, tutor and staff communities and we recognise that the freedom of speech is a core value of our British democracy. As such, we must all play a part in protecting one's right to express their genuinely held beliefs in good faith.

The College also employs a zero-tolerance approach to hate on any level. Greene's will approach any report of hate from within the student body as being subject to the College's Anti-bullying policy. For allegations made against staff and tutors, the approach outlined in Section VII should be used, i.e., the case should be escalated to the College's DSL, who should carefully consider further escalation to the LADO if appropriate.

l) 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.

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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.

m) Mental health issues (within the Social, Emotional and Mental Health spectrum)

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 is key that staff are aware of how these children's experiences can impact on their mental health, behaviour, and education.

n) Online safety

At Greene's, we are committed to providing a safe and secure online environment for all members of our community, including students, staff and tutors, and parents/guardians. In today's digital age, we recognise the importance of responsible and respectful online behaviour. We are dedicated to fostering a culture of online safety where online resources and tools are used ethically, respectfully and for educational purposes.

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We maintain a separate and comprehensive Online Safety policy which outlines our principles, guidelines, and expectations to ensure a positive and secure online experience for everyone.

o) Preventing radicalisation

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 OSCP.

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.

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XIII. Role of the designated safeguarding lead

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

1. 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 OSCP.

2. 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.

3. 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

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- 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 OSCP 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.

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XIV. Keeping records and reporting concerns

Good record keeping is essential in safeguarding the welfare of children

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 handwritten, 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.

1. <u>Who can make a report?</u>

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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 relevant safeguarding authorities or Thames Valley Police Child Abuse Investigation Unit these written reports will be sent and copies kept by Greene's.

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.

2. Access to 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 pace. 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 OSCP.

Child Protection records can be kept on computer and are exempt from the disclosure provisions of the Data Protection Act 2018 For manual

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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.

3. What should happen to the information when a child leaves the school?

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.

4. 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.

XV. Guidance on dealing with disclosures

1. 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 disbelieve but take what is said seriously. Take notes, being careful to write down the child's words and not an interpretation.

2. 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.

3. React

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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.

4. 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.

5. 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.

6. 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.

XVI. 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

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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
- 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 College 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.

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APPENDIX ONE – RECORD OF CONCERN

Name of child:	Date of birth:
Date of incident:	Date of report:
Nature of Concern: What prompted this record? (Please include dates, times, incidents, behaviours)	
Background: (Information that could explain child's behaviour)	
Does the concern fall into one of the following categories? Neglect Sexual Abuse	

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Physical Abuse	Emotional Abuse
Signed_____	Signed _____
Name_____ (printed)	Name_____ (printed)
(Member of staff)	Designated Safeguarding Lead
Has this information been passed to any other agencies? (Please give details) If not, please record reasons why:	

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