Policy 1.6a – Safeguarding Children

Policy Number	1.6a	Review Cycle	Annual	Reviewer
Date Created	March 2018	Review Date(s)	September 2019	Katie Simpson (SIAG Mgr)
Author	Katie Simpson		February 2020	Katie Simpson (SIAG Mgr)
			June 2020	Katie Simpson (SIAG Mgr)
			August 2020	Katie Simpson (DI Mgr)
			August 2021	Katie Simpson (DI Mgr)
Delegated Committee	Safeguarding, Prevent and Equalities			

This Policy should be read in conjunction with the following Landmarks policies and documents:

Policies	Documents
1.6 Safeguarding Adults 1.10 Code of Conduct 1.5 Anti-Bullying 4.3 Safer Recruitment 4.8 Personal Safeguards 6.1 Digital Technology Acceptable Use 4.9 Visitors	Keeping Children Safe in Education Part One, 2021 Staff Handbook

All college policies are impact screened by the Safeguarding, Prevent and Equalities Committee (SPEC) when material changes are proposed to policies. It is for the Policy Author to highlight to SPEC when material changes are proposed.

The policy has been reviewed using the Equality Impact Screening tool (EIS), positive impact is explicitly intended and very likely.

This policy was EIS by SPEC on: _____

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Scope and Purpose

Landmarks fully recognises the contribution it can make to protect children (under the age of 18) and support learners in college. The aim of the policy is to safeguard and promote our learners' welfare, their safety and mental and physical health, by fostering an honest, open, caring, and supportive culture. The learners' welfare is of paramount importance. For information about safeguarding adults (over the age of 18) please refer to policy 1.6, Safeguarding Adults.

This policy is for use by all employees, volunteers, and trustees of Landmarks.

The policy draws guidance from the following documents:

- Keeping Children Safe in Education 2021

- Working Together to Safeguard Children 2018

Safeguarding Commitment

Landmarks sets out a safeguarding commitment to:

- Establish and maintain an ethos where children feel safe, are encouraged to talk about their concerns, are listened to and included as much as possible in any decisions that affect them.
- Ensure that children know that there are adults in the College whom they can approach if they are worried or are in difficulty.
- Foster a culture where abusive, neglectful, or inappropriate behaviour displayed by staff and learners is challenged, and not tolerated.
- Ensure that all staff receive regular training in order to be knowledgeable about the safeguarding concerns our learners may face, including being aware of signs and indicators of abuse and how to respond to a concern.
- Have a team of skilled safeguarding leads who are accessible and able to guide staff in relation to any concerns or queries.
- Include in the curriculum activities and opportunities for personal and social development which equip children with the skills they need to stay safe from abuse (including online), and to know to whom they can turn for help.
- Ensure every effort is made to establish effective working relationships with parents and colleagues from other agencies.
- Operate safer recruitment procedures and make sure that all appropriate checks are carried out on new staff and volunteers who will work with children, including identity, right to work, enhanced DBS criminal record and barred list (and overseas where needed), references, and prohibition from teaching or managing in schools.
- Share information as needed with involved professionals as part of child protection practices.

Roles and Responsibilities

Within Landmarks, the following staff members have specific roles related to safeguarding:

- Designated Safeguarding Lead (DSL): Katie Simpson (Developing Independence Manager)
- Designated Safeguarding Officers (DSO):
    - Larry Brocklesby (Principal)
    - Emily Lang (Director of HR and Core Services)
    - Darren Mitchell (Personal Tutor and General Manager of The Archer)
    - Kayleigh Searston (Additional Learning Support Manager)
    - Jo Untisz (Tutor)
    - Dean-Turner Moss (ICT and MIS Coordinator, CEOP Ambassador)
    - Maxine Crookes (Job Coach Coordinator)
    - Natalie Hall (Additional Learning Support Supervisor)

  - Elizabeth Walker (Transition Officer, CEOP Ambassador)
  - Rebecca Plant (Integrated Therapies Manager/Occupational Therapist)
  - Steve Ingram (Employability and Functional Skills Manager)
  - Clare Connolly (Director of Quality)
- Prevent Single Point of Contact (SPOC): Katie Simpson
- Nominated Safeguarding Trustees:
  - Curriculum: Christine O'Neil
  - Safer Recruitment: Gemma Morris
  - Learner Wellbeing: Paul Battiste
- Designated Person for Looked After Children: Clare Connolly

Within Landmarks there are various levels of responsibility for safeguarding dependant on the roles listed above – for a full and comprehensive list of these responsibilities, please refer to Part Two within Keeping Children Safe in Education (2021). It is important to note however that **all** adults working with or on behalf of children, including those in non-learner facing roles, have a responsibility to safeguard and promote their welfare. **All staff** will receive safeguarding training that takes place annually, along with regular updates from the safeguarding team including "top up" training. **All staff** have the responsibility of reading this policy and Part One of Keeping Children Safe in Education (2021).

Extended College Activities

Where the College provides services or activities directly under the supervision or management of staff, the arrangements for child protection will apply. Where services or activities are provided separately by another body, the College will seek assurance in writing that the body concerned has appropriate policies and procedures in place to safeguard and protect children.

Contractors and Visiting Professionals

Contractors – When contractors are visiting the College while learners are also on-site, safeguarding requirements will be set out within the contract between the organisation and the College. Contractors will be expected to follow the visitor's policy which will be provided and explained on arrival.

Visiting Professionals (including visiting speakers) – Prior to, or upon arrival, ID will be checked. All visitors must be chaperoned, as per the Visitors Policy. Visiting speakers include individuals who have been invited to the College to talk to learners about a specific topic, for example talking about their place of employment as part of a careers event. All visiting speakers must be risk assessed prior to the agreement of the visit (please see Annex 6).

Records, Monitoring, and Transfer

Well-kept records are essential to good child protection practice. All staff are clear about the need to record and report concerns about a child or children within the college. The Designated Safeguarding Lead is responsible for such records and for deciding at what point these records should be passed over to other agencies. Child protection records are stored securely, with access confined to the safeguarding team.

When children transfer their safeguarding records are also transferred. Safeguarding records will be transferred separately from other records and best practice is to pass these directly to a Designated Safeguarding Lead in the receiving school/college, with any necessary discussion or explanation and to obtain a signed and dated record of the transfer. In the event of a child moving out of area and a physical handover not being possible then the most secure method should be found to send the confidential records to a named Designated Safeguarding Lead and a photocopy kept. Files requested by other agencies e.g. Police should be copied.

Please note that the Data Protection Act 2018 and GDPR do not prevent the sharing of information for the purposes of keeping children safe. Please also note that safeguarding records are kept at the College for 10 years.

Support for Learners and Staff

Support for Learners - Our college recognises that children who are abused or who witness violence may find it difficult to develop a sense of self-worth and view the world in a positive way. For such children, College may be one of the few stable, secure and predictable components of their lives. Other children may be vulnerable because, for instance, they have a disability, are in care, or are experiencing some form of neglect. Our College seeks to remove any barriers that may exist in being able to recognise abuse or neglect in learners with Special Educational Needs or Disability. We will seek to provide such children with the necessary support and to build their self-esteem and confidence.

Individual Risk Assessments - All learners at Landmarks have an individual risk assessment which provide information to support the management of risk in delivering the learner's individual learning programme. The aim is to ensure that the balance of risk against achieving progression remains central to the work of the College, teaching learners to become less vulnerable, more skilled and increasingly independent within the community. Through admission, and regular observations, the College identifies learners who may be considered more vulnerable due to their needs and levels of understanding of potential risks. Personal Tutors update these risk assessments regularly to ensure that the documents remain responsive to learner

progression and support requirements. These records include quantifying the level, likelihood, and severity of risks, and what actions the College can take to reduce the risks.

Support for Staff - As part of their duty to safeguard and promote the welfare of children and young people, staff may hear information from the child/young person as part of a disclosure or from another adult that will be upsetting. Where a member of staff is distressed as a result of dealing with a child protection concern, he/she should in the first instance speak to a safeguarding officer about the support they require. The safeguarding officer or Designated Safeguarding Lead should seek to arrange the necessary support.

Working with Parents and Carers

Landmarks recognises the importance of involving families within decisions pertaining to the care of a child. The College will:

- Ensure that parents/carers understand the responsibility placed on the College and its staff for child protection via the website.
- Undertake appropriate discussion with parents/carers prior to involvement of Children's Social Care or another agency, unless to do so would place the child at risk of harm or compromise an investigation.

Specific Safeguarding Concerns Relating to Child Protection

There are a wide range of safeguarding issues and concerns detailed in Policy 1.6 Safeguarding Adults which all staff and volunteers should be aware of. The concerns below are those that are specific to children aged under 18, as stated in Keeping Children Safe in Education (2021).

Peer-on-Peer Abuse - Landmarks recognises that children sometimes display abusive behaviour themselves and that such incidents or allegations must be referred on for appropriate support and intervention. Such abuse will not be tolerated or passed off as "banter" or "part of growing up". This abuse could for example include:

- Bullying (including cyberbullying, prejudice-based and discriminatory bullying).
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm.
- Abuse in intimate personal relationships between peers.
- Sexual violence, such as rape, assault by penetration and sexual assault.
- Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be stand-alone or part of a broader pattern of abuse.
- Consensual and non-consensual sharing of nudes and semi-nude images and/or videos – while consensual image sharing may not be abusive, children must know that it is illegal.

- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.
- Upskirting, which typically involves taking a picture under a person's clothing without them knowing, 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.

Learners can self-report concerns in several ways, from speaking to a trusted staff member (whether verbally or through written communication, including email), alerting a staff member through the 'report' button on college computers, or calling or texting the safeguarding mobile. Staff must be vigilant towards signs of abuse in all learners and consider that non-verbal learners or learners who have difficulties in communication may not be able to alert a staff member to a concern. Just because concerns are not being disclosed, it does not mean that cases are not happening. Staff must consider individual support needs and utilise methods such as symbols and other communication aids to support learners to raise their concerns.

Allegations of peer-on-peer abuse will be recorded and investigated in the same manner as all safeguarding concerns, including involving the victim of abuse and/or harassment in the investigation, informing parents/carers and the Local Authority; but unlike most concerns will also involve suspension of the suspected perpetrator(s) while the investigation takes place. Cases will be referred to the relevant Multi-Agency Safeguarding Hub and the police, depending on the type of concern reported.

Support for victims and other children affected by peer-on-peer abuse: following an incident of peer-on-peer abuse, victims and other children affected (such as witnesses to the abuse) may need further support. The effects of abuse can be long-lasting. The college will support with this as much as possible including making any reasonable adjustments, signposting to support agencies, and facilitating referrals to organisations who can provide further advice and guidance.

Support for perpetrators: depending on the type of abuse committed, and following advice from other involved professionals (such as the police), perpetrators may return to the college to continue their programme where they will also receive education about peer-on-peer abuse.

In June 2021, Ofsted published their findings from an extensive review into sexual abuse and harassment within schools and colleges. Please see Annex 10 to see how Landmarks are addressing the recommendations outlined in this report, and refer to 'Annex 3 - Child-on-child sexual violence and harassment procedure' for more information about Landmarks' process related to this. A college safety plan

Policy 1.6a – Safeguarding Children has been produced in response to Ofsted's recommendations, which can be found through the safeguarding SharePoint or by following this link.

Online Safety – It is essential that a whole college approach to online safety is in place to protect and educate children in relation to online safety. The issues that children can face can be categorised into four areas of risk (from Keeping Children Safe in Education, 2021):

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

Many children have access to the internet through personal devices that they may bring to the college, e.g. mobile phones and tablets, which means that learners could sexually harass their peers and engage in other harmful behaviours through such devices while attending college. Although college computers are monitored through NetSupport, personal devices cannot be monitored, so education about e-safety is vital to empower learners to keep themselves safe and know how to report concerns.

The Ofsted report mentioned above (see Annex 10) found that some learners will not feel comfortable reporting any issues involving sexual abuse and harassment, including those that occur online. Through having a culture that does not tolerate abuse, neglect, and other harmful behaviours, through the education that is provided to learners, though being respectful and sensitive towards learner views, and through staff vigilance, Landmarks hopes to support learners to feel confident in self reporting any concerns that they may have.

Sexting – Another form of peer-on-peer abuse. The College will always respond if informed that children have been involved in 'sexting' (youth produced sexual imagery). The UK Council for Child Internet Safety (UKCCIS) guidance, "Sexting in schools and colleges: Responding to incidents and safeguarding young people" (2016) will be used to guide the College's response on a case-by-case basis.
The key points being:

- Inform the Safeguarding Team as soon as possible.
- Support the victim as appropriate and in accordance with their best interests.

- Inform all parents of involved children unless by doing so you put a child at risk.
- Images will not be viewed by staff.
- If College is to deal with the matter, involve parents in ensuring the images are deleted.
- If there is evidence of exploitation or the targeting of a vulnerable learner, inform the police.

Children Missing from Education – Landmarks recognises the entitlement that all children have to education and will work closely with the local authority to share information about learners who may be missing out on full time education or who go missing from education. The local authority will also be informed where children are to be removed from the college a) to be educated outside the college system; b) for medical reasons; c) because they have ceased to attend; d) because they are in custody; d) because they have been permanently excluded. See Annex 4 for the procedure for children who go missing during college hours.

Child Sexual Exploitation - This is a form of sexual abuse where children are sexually exploited for money, power or status. It can involve violent, humiliating and degrading sexual assaults. In some cases, young people are persuaded or forced into exchanging sexual activity for money, drugs, gifts, affection or status. A significant number of children who are victims of sexual exploitation go missing from home, care and education at some point. Staff training includes raising awareness of this issue and any concerns are passed to the Designated Safeguarding Lead who will make a risk assessment and refer to Local Authority First Response Children's Duty if appropriate.

Child Criminal Exploitation – This is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity, in exchange for something the victim needs or wants, and/or for the financial or other advantage of the perpetrator, and/or through violence or threat of violence. This does not always involve physical contact but can also occur through technology. CCE can include children being forced to work in cannabis factories, being forced to pickpocket or threaten others, or moving drugs across the country (see County Lines, below).

County lines – This is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs into one or more importing areas in the UK. Offenders will often use coercion, intimidation, violence and weapons to have children and vulnerable adults transport drugs and money between locations, usually over various counties.

Serious violence - All staff should be aware of indicators, which may signal that children are at risk from, or are involved with serious violent crime. These may include increased absence from college; a change in friendships or relationships with older individuals or groups; a significant decline in performance, signs of self-

harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs.

Domestic abuse – Any incident, or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. This abuse can include psychological, physical, sexual, financial and emotional abuse. All children can witness and therefore be adversely affected by domestic abuse. Exposure to domestic abuse or violence can have a serious, long lasting emotional and psychological impact on children.

Child abduction and community safety incidents – Child abduction is the unauthorised retention or removal of a child from their parent/carer or anyone with legal responsibility for the child. Community safety incidents in the vicinity of the college may be a cause for concern (e.g., unknown adults engaging children in conversation). Education about community safety is crucial in supporting vulnerable children to safeguard themselves and know how to seek support.

Cybercrime – This involves criminal activity committed using computers and/or the internet. This is categorised into two areas:

- Cyber enabled crime, which is crime that can also occur offline but is facilitated by being online, such as fraud, child criminal exploitation and child sexual exploitation, etc.
- Cyber-dependent crime, which is crimes that can only be committed using a computer, such as unauthorised access to computers (illegal 'hacking').

Children with a particular skill or special interest in computing and technology may inadvertently, or deliberately, stray into cyber-dependent crime.

Children Potentially at Greater Risk of Harm

Keeping Children Safe in Education (2021) informs that additional safeguarding challenges may be faced by children with special educational needs or disabilities (SEND) or certain health conditions, which affects all learners at Landmarks. These challenges include:

- Behavioural and/or mood changes being dismissed as relating to the child's difficulties.
- Being at increased risk of peer group isolation or bullying.
- The possibility of being abused, neglected, or exploited without children showing any signs that this may be happening.
- Communication barriers for non-verbal children and those with difficulty communicating in being able to report any concerns.

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Staff at Landmarks are skilled in being able to support all learners appropriately according to their individual needs. Support ratios ensure that learners are supervised and encouraged to develop personal and social development skills including resilience, and the ability to inform a trusted staff member when something is not right. Regular training ensures that staff are knowledgeable of the signs and indicators of abuse and how these may present across learners. Having a whole college approach to safeguarding ensures that staff members remain vigilant and speak to the safeguarding team with any concerns without delay.

It is important to note that while all children should be protected from harm, some groups of children are potentially at greater risk.

Children with a social worker – Children may have a social worker due to their Special Educational Need or Disability, but they may also need a social worker due to safeguarding or welfare needs.

Children missing from education – Children missing from education, especially those who a persistently missing, can act as a key warning sign to a range of safeguarding concerns including neglect, sexual abuse, and child criminal and sexual exploitation.

Elective home education – Many children who are educated at home have a positive learning experience, however it is not the case for all. Where a parent/carer has expressed their intention to remove their child from the college in order to educate at home, the local authority must be informed.

Children requiring mental health support – mental health difficulties can sometimes be an indicator of abuse, neglect or exploitation.

Looked after children and previously looked after children – The most common reason for children becoming looked after is as a result of abuse and/or neglect. A previously looked after child (a person who was classed as a looked after child, who is now 18 or over) remains vulnerable.

Annex 1 – Safeguarding Poster

Annex 2 – Safeguarding Partnership Contacts by Local Authority

Safeguarding Partners replace Local Safeguarding Children Boards and are comprised of a team of professionals from three sectors: the local authority; the clinical commissioning group for any area that falls under the local authority; and the chief officer of police for any area that falls under the local authority. The 3 Safeguarding Partners are responsible for agreeing on and implementing any new safeguarding strategies to improve multi-agency working capacity and improve the provision of safeguarding and child protection in the local area.

Derby and Derbyshire
Web: https://www.ddscp.org.uk/
Tel (including LADO): 01629 533190
Email: ddscp@derby.gov.uk

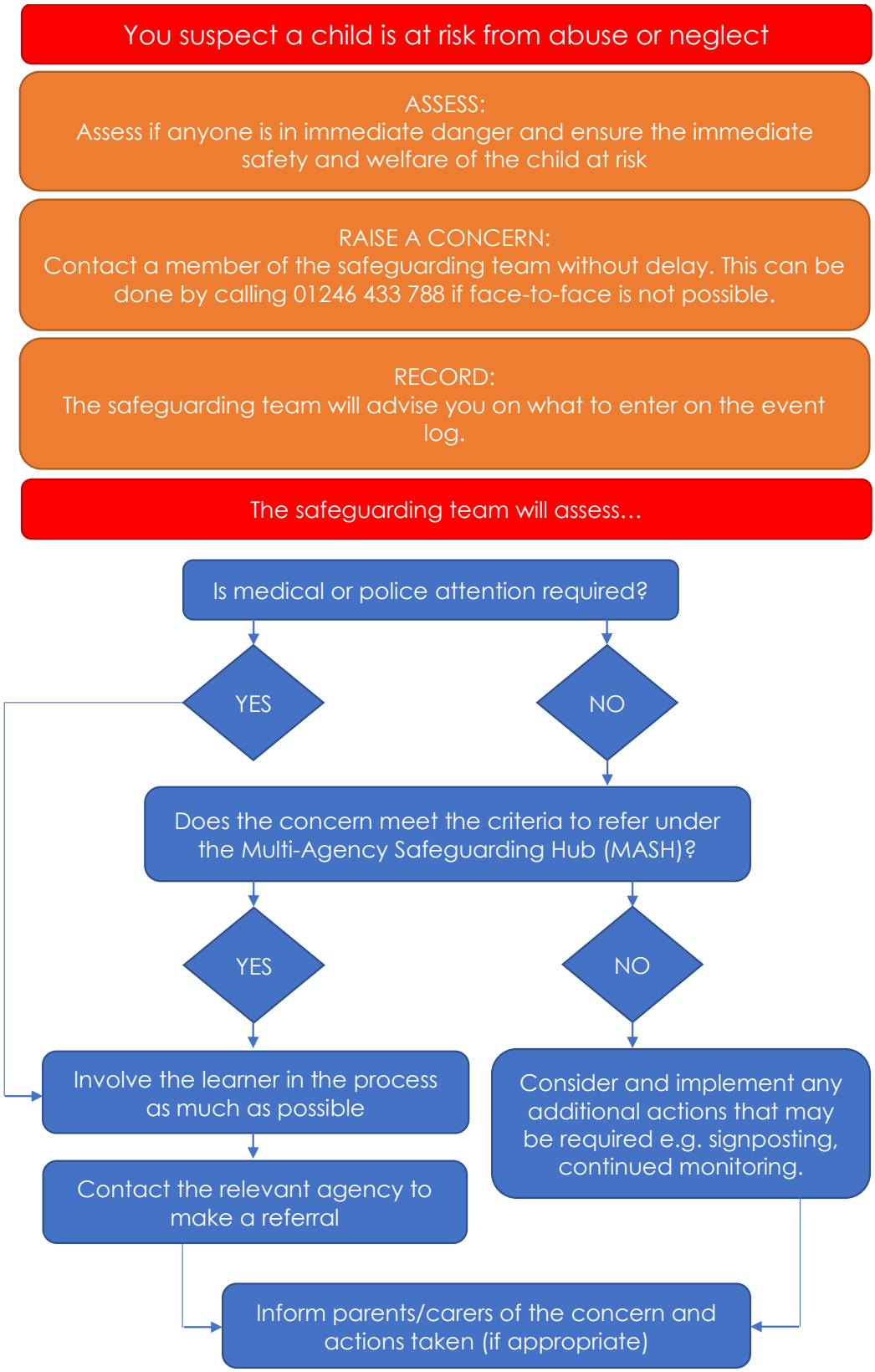
Nottinghamshire
Web: https://nscp.nottinghamshire.gov.uk/
Tel: 0115 9773935
Email: info.nscp@nottscc.gov.uk
LADO: 01159 773921

Nottingham City
Web: https://www.nottinghamcity.gov.uk/ncscp
Tel (including LADO): 0115 8764762
Email: safeguarding.partnerships@nottinghamcity.gov.uk

Rotherham
Web: http://www.rscp.org.uk/
Tel: 01709 254924
Email: CYPS-SafeguardingBoard@rotherham.gcsx.gov.uk
LADO: 01709 336080

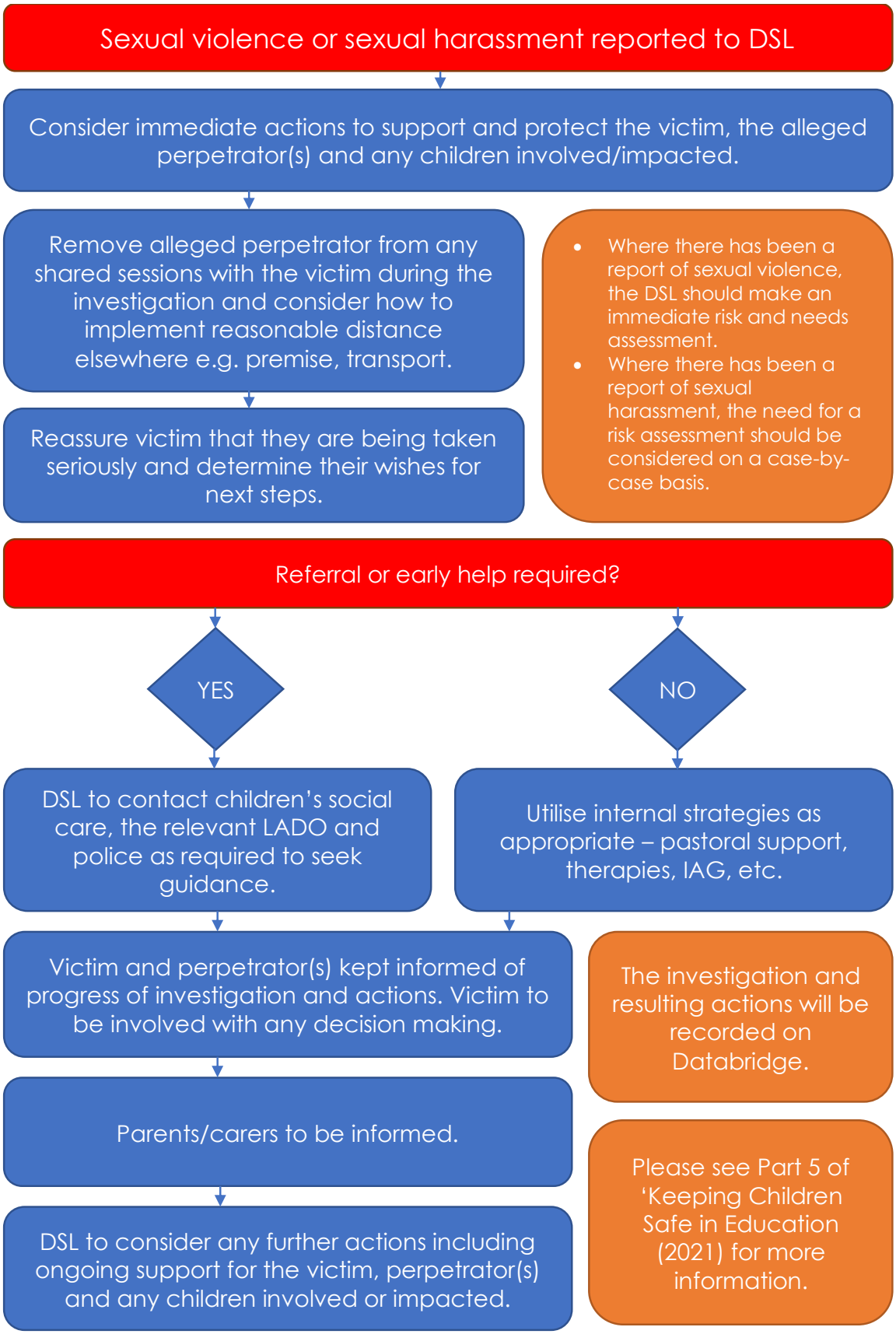
Sheffield
Web: https://www.safeguardingsheffieldchildren.org/sscb
Tel: 0114 273 4934
Email: scsp@sheffield.gov.uk
LADO: 01142 734855

Annex 3 – Procedure to follow in cases of suspected abuse or cause for concern about a child



Please note that it is unlikely that a staff member who makes a referral will hear the outcome of their concern due to confidentiality. Actions resulting from referrals will be shared on a need-to-know basis only.

Annex 4 – Child-on-child sexual violence or sexual harassment procedure



Annex 5 – Process for dealing with allegations against staff, volunteers, and contractors

These procedures should be followed in all cases in which there is an allegation or suspicion that a person working with children has:

- Behaved in a way that has harmed a child or may have harmed a child.
- Possibly committed a criminal offence against or related to a child.
- Behaved towards a child or children in a way that indicates he or she would pose a risk of harm to children.
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children (including behaviours that may have happened outside of college, known as transferable risk).

Part One: Initial response to an allegation

When an allegation is made, there are two aspects to consider:

1. Looking after the child's welfare – the DSL is responsible for ensuring the child is not at risk and referring cases of suspected abuse to the local authority's children's social care.
2. Investigating and supporting the person subject to the allegation – the DSL (or investigating officer) should discuss the nature, content, and context of the allegation with the LADO and agree a course of action.

When dealing with allegations, the college should:

- Apply common sense and judgement.
- Deal with allegations quickly, fairly, and consistently.
- Provide effective protection for the child and support the person who the allegation was made against.

Allegations will be managed by the DSL or an investigating officer, or the Chair of Trustees in the event that an allegation has been made against the Principal. The DSL or investigating officer may need to consider a variety of questions, for example:

- Was the person at college at the time of the allegation?
- Did the individual come into contact with the child, or could they have?
- Were there any witnesses?
- Is any CCTV footage available?

Suspension

Staff members under investigation due to an allegation will not automatically be suspended; all options to avoid suspension must firstly be considered. If immediate suspension is considered necessary, the DSL or investigating officer should record the rationale as part of the investigation and detail why alternatives to suspension were rejected.

Supporting the child:

- The welfare of a child is paramount and will be the prime concern in terms of investigating an allegation against a person in a position of trust.
- Children and their parents/carers should be formally told about the allegation as soon as possible. The DSL or investigating officer should liaise with the LADO or police on what information can be disclosed.
- Children and their parents/carers should be kept informed about the progress of the investigation but only in relation to the child – information about the staff member cannot be disclosed.
- Children and their parents/carers should be made aware of the requirement to maintain confidentiality and unwanted publicity about any allegations against staff while the investigation is in progress (as set out in section 141F of the Education Act, paragraphs 372-380)
- Please see page 5, 'Support for Learners' for more information.

Duty of care towards staff members in the event of an allegation:

- The stress caused by the allegation should be managed and minimised as much as possible.
- The individual should be informed as soon as possible of an allegation, with the likely course of action explained.
- The individual should be advised to seek support from their line manager.
- The college will appoint a named representative to keep the person informed about the progress of the case.
- The college will provide access to counselling or medical advice where appropriate (this may include advising the individual to refer to Westfield Health or their GP)
- In the event of a staff member being suspended, the college will not prevent social contact with work colleagues unless there is evidence to suggest this may affect the gathering of evidence.

Landmarks will make every effort to maintain confidentiality and guard against any unwanted publicity while an allegation is being considered or investigated.

Allegation Outcomes

The possible outcomes of an allegation are as follows:

- Substantiated – there is sufficient evidence to prove the allegation.
- Unsubstantiated – there is insufficient evidence to either prove or disprove the allegation.
- Malicious – there is sufficient evidence to disprove the allegation, and that there has been a deliberate act to deceive or cause harm through an allegation.
- False – there is sufficient evidence to disprove the allegation.

- Unfounded – where there is no evidence, or proper basis to support the allegation.

Part Two: Concerns that do not meet the harm threshold

A low-level concern is any concern that does not meet the criteria set out above and could include a concern about a staff member who:

- Is overly friendly with children.
- Has favourites.
- Uses inappropriate, sexualised, intimidating or offensive language.

Any concern, no matter how small, should be reported to the safeguarding team.

Annex 6 – Children who go missing in education

Definition - When a learner's whereabouts cannot be established; where the circumstances are out of character, or the context suggests the person may be the subject of a crime or at risk of harm to themselves or another.

Is the learner at significant risk?

A learner missing during college hours would be prioritised as significant risk where the risk posed is immediate and there are substantial grounds for believing that the child/young person is in danger through their own vulnerability. Vulnerability characteristics may include:

- Children on a plan (Early Help, Child in Need, Looked After or Child Protection Plan)
- A disability and/or special educational needs
- Substance misuse
- The risk posed is immediate and there are substantial grounds for believing that the public is in danger.
- There are indications that the child/young person has already come to harm (CSE, grooming, radicalisation etc.)

Other contributory factors should be taken into consideration when determining if the pupil is at significant risk, for example:

- Have there been past concerns about this child and family which together with the sudden disappearance are worrying?
- Is there any known history of drug or alcohol dependency within the family?
- Is there any known history of domestic violence?
- Is there concern about the parent/carer's ability to protect the child from harm?
- Is this very sudden and unexpected behaviour?
- Have there been any past concerns about the child associating with significantly older young people or adults?
- Was there any significant incident prior to the child's unexplained absence?
- Has the child been a victim of bullying?
- Are there health reasons to believe that the child is at risk? e.g. does the child need essential medication or health care?
- Was the child noted to be depressed prior to the child's unexplained absence?
- Are there religious or cultural reasons to believe that the child is at risk? e.g. rites of passage, female genital mutilation or forced marriage planned for the child?

Procedure

Once a learner is identified as missing by any member of staff, a Designated Safeguarding Officer (DSO) will be informed. The DSO will use professional judgement and risk asses the urgency of the situation to help inform the timeframe

required in establishing the learner's whereabouts before notifying the Police. Timeliness should be on a case-by-case basis.

The DSO should, together with the learner's personal tutor, assess the child's vulnerability and risk of immediate harm – where there is deemed to be significant risk, the Police will be contacted.

If the learner is known to abscond, details of any specific procedural requirements will be listed in their individual risk assessment. Where the learner is not known to abscond:

- The Personal Tutor or DSO will contact the learner's parents/carers to inform of the situation;
- Staff will attempt to locate the learner;
- If the learner is found, the Personal Tutor or DSO will contact the learner's parents/carers to either inform that the learner has returned to the college premises or has refused to return;
- If the learner is not found within the agreed timeframe, the DSO will inform the relevant MASH team and/or the Police;
- The learner's risk assessment will be updated to reflect the risk of going missing.

Annex 7 - Visiting Speaker & Events Risk Assessment

Name of Speaker / Event Lead	
Speaker's Organisation	
Speaker Email address	
Date of Proposed Visit	
Name of Contact at Landmarks	
Title of Talk / Topic	
Please outline below the information you wish to communicate in your talk to Landmarks learners'.	
Has the speaker been refused to speak publicly or at any other educational establishment before? If yes, please provide details.	
Yes / No	
Are there any other details about the event that should be noted, i.e. if the event is approved, is there a likelihood of media interest?	
Yes / No	
Please sign below to confirm: ▪ That the information you have provided is true and accurate ▪ That you agree to the 'Guidelines for Visiting Speakers' overleaf ▪ That you will bring valid photo ID (Driving License or Passport) with you on the day as proof of your ID.	
Signature:	Date:

Please now send this form back to your contact at Landmarks College as soon as possible.

Policy 1.6a – Safeguarding Children
Guidelines for Visiting Speakers

Landmarks values visits from speakers that enrich our learners' experience of College, providing them with information that helps them make decisions at different phases of their education, widening their understanding of world and global issues and providing motivational inspiration through the sharing of a speaker's experience. Our responsibility to our learners is to ensure that they can critically assess the information they receive as to its value to themselves, and that the information is aligned to the ethos and values of the College and British Values.

The 'Prevent Duty' statutory guidance requires colleges to have clear protocols for ensuring that any visiting speakers, whether invited by staff or learners, are suitable and appropriately supervised. As per the 'Prevent Duty' guidance, visiting speakers are required to agree to the following terms and conditions:

- The presentation must not incite hatred, violence, or call for the breaking of the law.
- The visiting speaker is not permitted to encourage, glorify or promote any acts of terrorism, including individuals, groups or organisations that support such acts.
- The visiting speaker must not spread hatred and intolerance of any minority group/s in the community.
- The visiting speaker must seek to avoid insulting other faiths or groups, within a framework of positive debate and challenge.
- Visiting speakers are not permitted to raise or gather funds for any external organisation of cause without express permission from the Principal.
- College staff have the right and responsibility to interrupt and/or stop the presentation for any violation of this agreement.

By signing this document, you are confirming that research has been carried out on the Speaker and the organisation(s) they are affiliated to.		
Please list research activities undertaken:		
Risk Level:	Low | Acceptable | Moderate | Extreme	
Decision by Organiser:	Signature of Organiser:	Date:
Approved | Not Approved		
Approved by DSL:		Date:

Risk Level	**Rating Description**
Low	The speaker or guest is a known expert in their field and is not known to be controversial, or to hold controversial views. His/her presence on college premises is not likely to be regarded as provocative in any way. The topic of the talk is not controversial nor is it likely to be regarded as offensive by anyone. Access to the event is limited to Landmarks learners and staff only.
Acceptable	The speaker or guest may hold a strong position on their topic, but this would not be regarded as controversial. The speaker / guest may not have a publicly established reputation in their field. The talk is not likely to be regarded as controversial. It is very unlikely to attract adverse media attention or require security presence. Attendance may be high, but the event is open to Landmarks learners and staff only.
Moderate	The speaker and/or topic may be uncontroversial, but the event is open to non-Landmarks learners and staffs, including the general public and high numbers are likely to attend. The topic may be regarded by some as controversial and this could be a cause for concern even if attendance is likely to be low.
Extreme	The speaker/guest and or topic are highly controversial and will likely attract adverse media attention. The speaker/guest has been refused permission to attend an event at Landmarks and other institutions before. High attendance is expected at the event. The speaker/guest and or topic may attract protest from other learners or outside organisations. Non-Landmarks learners and staff are invited to attend. Security presence would be essential. **The event should not take place unless strict controls are put in place to protect individuals and property.**

Annex 8 – Updates to Policy

This policy is updated annually in reflection to updates from key guidance – see references.

The updates to this policy are guided by Keeping Children Safe in Education (2021) and are as follows:

Location	Updates
Page 3	Roles and responsibilities have been updated to reflect changes within the team. Listed responsibilities have been removed - individual responsibilities of the safeguarding team are included within their job descriptions. Staff should refer to Keeping Children Safe in Education (2021) for more detail about role responsibilities.
Page 6	More detail about peer-on-peer abuse has been included.
Pages 7 & 10	Online safety, child abduction and community safety incidents, and cybercrime have been added as a specific safeguarding concern.
Page 10	A new section, 'Children potentially at greater risk of harm' has been included.
Page 12, Annex 1	Inclusion of the safeguarding poster
Page 14, Annex 3	The procedure for child-on-child sexual violence and sexual harassment has been separated from the main safeguarding concerns procedure to reflect the differences in managing a concern of this nature.
Page 15, Annex 4	The allegations process has been expanded to reflect updates to KCSIE (2021), including the addition of 'low level concerns'.
Page 25, Annex 9	This section has been updated to reflect the current situation in terms of safeguarding in relation to Covid-19.
Page 26, Annex 10	This section has been added to demonstrate Landmarks' response to Ofsted's review into sexual abuse in schools and colleges, including recommendations.

Annex 9 – References

Keeping Children Safe in Education (2021) - https://www.gov.uk/government/publications/keeping-children-safe-in-education--2

Working Together to Safeguard Children (2018) - https://www.gov.uk/government/publications/working-together-to-safeguard-children--2

Sexting in schools and colleges (2016) - https://www.gov.uk/government/publications/sexting-in-schools-and-colleges

Education Act (2011), paragraphs 372-380) - https://www.legislation.gov.uk/ukpga/2011/21/contents/enacted

College Safety Plan (2021) – https://landmarksspecialistcollege.sharepoint.com/:w:/g/safeguarding/EchA02SXBJhPqjFTe9xgkw4B3YD_GQIAva9nbW-a_bbQeg?e=jBDEjd

Annex 10 – Safeguarding Updates in Relation to Covid-19

Throughout the pandemic, Landmarks continues to have a duty of care to all learners in safeguarding them against abuse and neglect, whether they are learning at home or on site. It is therefore of vital importance that the College is able to maintain consistent, regular contact with learners and their families on an agreed level of frequency when learners are engaging in home learning.

It is equally important that Landmarks continues to work in partnership with other professionals to ensure the safety of learners during this time. The College will continue to keep open lines of communication with other professionals where safeguarding concerns do not meet MASH thresholds; for example, contacting adult social care, mental health support teams, or the learner's GP.

Landmarks recognises that online safety concerns may arise when learners are engaging in home education. Social isolation can cause online vulnerabilities which may have been affecting some learners since the first national lockdown. Landmarks continues to encourage safe use of the internet; a guide for parents/carers is available for supporting e-safety at home, and staff have recently undergone CEOP (Child Exploitation and Online Protection) training to refresh their knowledge and skills in this area.

It is expected that most, if not all, learners will have returned to their usual study programme at the time of this policy's publication (September 2021); nevertheless, learners may still need to temporarily participate in home learning if the need arises to self-isolate. Personal tutors will organize home learning and agree methods and frequency of contact as required.

The effects of the pandemic on learners' wellbeing may be long lasting and impact individuals in different ways. By implementing a whole college approach to safeguarding, Landmarks aims to provide input at the earliest opportunity to enable learners to feel safe and supported.

Updated: September 2021

Katie Simpson
Developing Independence Manager | DSL

Annex 11 – Landmarks Specialist College's response to Ofsted's review of sexual abuse in schools and colleges

Executive Summary and Recommendations

The review included visits to 32 schools and colleges. In these, we spoke to over 900 children and young people about the prevalence of peer-on-peer sexual harassment and sexual violence, including online, in their lives and the lives of their peers. We also spoke to leaders, teachers, governors, LSPs, parents and stakeholders. Finally, we reviewed the extent to which inspection has given sufficient oversight of this issue and considered how statutory guidance could be strengthened.

This rapid review does not report on individual schools and colleges or cases, all of which remain anonymous. We made a number of visits to schools named on the Everyone's Invited website, as well as others not named. But this should not be assumed to be a fully representative sample of all schools and colleges nationally. It presents a picture of strong and weaker practice across participating schools and colleges, from which we have drawn our conclusions. Our conclusions reflect the strengths and limitations of the evidence. They focus on what we were asked to report on. You can find a full description of the methodology at the end of this report.

This rapid thematic review has revealed how prevalent sexual harassment and online sexual abuse are for children and young people. It is concerning that for some children, incidents are so commonplace that they see no point in reporting them. This review did not analyse whether the issue is more or less prevalent for different groups of young people, and there may well be differences, but it found that the issue is so widespread that it needs addressing for all children and young people. It recommends that schools, colleges and multi-agency partners act as though sexual harassment and online sexual abuse are happening, even when there are no specific reports.

On our visits, girls told us that sexual harassment and online sexual abuse, such as being sent unsolicited explicit sexual material and being pressured to send nude pictures ('nudes'), are much more prevalent than adults realise. For example, nearly 90% of girls, and nearly 50% of boys, said being sent explicit pictures or videos of things they did not want to see happens a lot or sometimes to them or their peers. Children and young people told us that sexual harassment occurs so frequently that it has become 'commonplace'. For example, 92% of girls, and 74% of boys, said sexist name- calling happens a lot or sometimes to them or their peers. The frequency of these harmful sexual behaviours means that some children and young people consider them normal.

When we asked children and young people where sexual violence occurred, they typically talked about unsupervised spaces outside of school, such as parties or parks without adults present, although some girls told us they also experienced unwanted touching in school corridors.

Children and young people, especially girls, told us that they do not want to talk about sexual abuse for several reasons, even where their school encourages them to. For example, the risk of being ostracised by peers or getting peers into trouble is not considered to be worth it for something perceived by children and young people to be commonplace. They worry about how adults will react, because they think they will not be believed, or that they will be blamed. They also think that once they talk to an adult, the process will be out of their control.

Children and young people were rarely positive about the RSHE they had received. They felt that it was too little, too late and that the curriculum was not equipping them with the information and advice they needed to navigate the reality of their lives. Because of these gaps, they told us they turned to social media or their peers to educate each other, which understandably made some feel resentful. As one girl put it, 'It shouldn't be our responsibility to educate boys'.

In the schools and colleges we visited, some teachers and leaders underestimated the scale of the problem. They either did not identify sexual harassment and sexualised language as problematic or they were unaware they were happening. They were dealing with incidents of sexual violence when they were made aware of them, and following statutory guidance. But professionals consistently underestimated the prevalence of online sexual abuse, even when there was a proactive whole- school approach to tackling sexual harassment and violence.

In light of this, even where school and college leaders do not have specific information that indicates sexual harassment and online sexual abuse are problems for their children and young people, they should act on the assumption that they are. Leaders should take a whole-school/college approach to developing a culture where all kinds of sexual harassment and online sexual abuse are recognised and addressed. **To achieve this, schools and colleges need to create an environment where staff model respectful and appropriate behaviour, where children and young people are clear about what is acceptable and unacceptable behaviour, and where they are confident to ask for help and support when they need it.** Central to this should be a carefully planned and implemented RSHE curriculum, sanctions and interventions to tackle poor behaviour and provide support for children and young people who need it, training and clear expectations for staff and governors, and listening to pupil voice. Further guidance on many of these aspects can be found in 'Keeping children safe in education'.[footnote 2]

When it comes to sexual violence, it appears that school and college leaders are increasingly having to make difficult decisions that guidance does not equip them to make. For example, some school and college leaders told us that they are unsure how to proceed when criminal investigations do not lead to a prosecution

or conviction. Schools and colleges should not be left to navigate these 'grey areas' without sufficient guidance. Furthermore, the current guidance does not clearly differentiate between different types of behaviour or reflect the language that children and young people use, particularly for online sexual abuse.

Schools and colleges cannot tackle sexual harassment and sexual violence, including online, on their own, and neither should they. For example, the prevalence of children and young people seeing explicit material they do not want to see and being pressured to send 'nudes' is a much wider problem than schools can address. While they can play their part, it is not only their responsibility to solve it. The government will need to tackle this issue through the Online Safety Bill, and other interventions.

The LSPs that we met had varying levels of oversight and understanding of the issues for children and young people in their area. Some LSPs had been working closely with schools to track and analyse data from schools, and understood children's experiences of sexual harassment and violence, including online. However, a small number told us that they were not aware that sexual harassment and violence, including online, in schools and colleges were significant problems in their local area. In light of what children and young people told us, they almost certainly are significant problems in every area. Gaining an overview of the issues requires effective joint working between LSPs and all schools and colleges, something that is not currently happening consistently. **Some schools and colleges also reported that working across a number of local authorities presented challenges, as the level of support varied from area to area. Clearer guidance would help to overcome some of these difficulties, as would more learning and sharing of practice across LSPs, schools and colleges.**

A review of Ofsted and Independent Schools Inspectorate (ISI) frameworks, training and handling of complaints found that safeguarding is generally well covered on inspection, inspectors are prepared, and complaints are generally dealt with well. However, there are improvements that can be made. As a result of this review, both Ofsted and ISI will update training, inspection handbooks and inspection practices where necessary to strengthen inspectors' ability to inspect how schools and colleges are tackling sexual harassment and sexual violence, including online. Ofsted will follow up the publication of this report with a series of webinars and events for schools and colleges to discuss the findings of this review. ISI will also provide a series of webinars and events for schools about the findings of this review.

As a result of the findings of this review, we recommend the following.

Recommendations for school and college leaders

School and college leaders should create a culture where sexual harassment and online sexual abuse are not tolerated, and where they identify issues and intervene early to better protect children and young people.

In order to do this, they should assume that sexual harassment and online sexual abuse are happening in their setting, even when there are no specific reports, and put in place a whole-school approach to address them. This should include:

Recommendation	DSL Response
a carefully sequenced RSHE curriculum, based on the Department for Education's (DfE's) statutory guidance, that specifically includes sexual harassment and sexual violence, including online. This should include time for open discussion of topics that children and young people tell us they find particularly difficult, such as consent and the sending of 'nudes' high-quality training for teachers delivering RSHE routine record-keeping and analysis of sexual harassment and sexual violence, including online, to identify patterns and intervene early to prevent abuse	RSHE is school termed curriculum, however we do cover similar topics within PSD (Personal and Social Development) sessions. Given the safeguarding analysis of 2020-21, there is cause for us to examine how effective our delivery is around sexual harassment and violence. It is our expectation to focus on these areas in the new academic year. A new sequenced PSD curriculum will be published for review in September 2021. Sexual harassment and abuse will feature as a standing item on the safeguarding team agenda and the board will be notified of issues in the Principals report and at SPEC.
a behavioural approach, including sanctions when appropriate, to reinforce a culture where sexual harassment and online sexual abuse are not tolerated	Where appropriate these are in place. On occasion a learner's level of understanding and disability can have a contributory factor, especially in relation to capacity, therefore each case will be investigated thoroughly to determine whether this is intended harassment or a disability-linked misunderstanding which may require different sanctioning and support.
working closely with LSPs in the area where the school or college is located so they are aware of the range of support available to children and young people who are victims or who perpetrate harmful sexual behaviour	Working across different LA's has resulted in different levels of support, however we are confident of the support available and will utilise it more when delivering the new PSD curriculum. Work is also needed supporting parents and consideration is being given to online training from our CEOP ambassadors to parents as part of our parental engagement work.

support for designated safeguarding leads (DSLs), such as protected time in timetables to engage with LSPs	Time is available, with a number of DSLs having non-contact time to work with LSPs.
training to ensure that all staff (and governors, where relevant) are able to: better understand the definitions of sexual harassment and sexual violence, including online sexual abuse and identify early signs of peer-on-peer sexual abuse	CEOP Ambassadors to provide training and a review of training needs to be done in time for September, so that all staff improve their knowledge and awareness of signs and indicators of sexual abuse and or harassment. Trustee training to be included.
consistently uphold standards in their responses to sexual harassment and online sexual abuse	Develop a college safety plan that will ensure support, education, information and guidance is available at all levels and makes the presumption that Sexual harassment and online sexual abuse is present within the college. This is to be led and monitored by the DSL team.

The college safety plan will be reported to the SPEC committee and quarterly reports will be provided to the board.

Where new guidance is published, the college will consider it in light of its activities and actions and adapt plans accordingly.

Larry Brocklesby
Principal | Senior Safeguarding Lead