

NOTRE DAME CATHOLIC SIXTH FORM COLLEGE

Child Protection and Safeguarding Policy and Procedures 2020-21



Notre Dame

CATHOLIC SIXTH FORM COLLEGE

Abbreviations:

- DSL – Designated Senior Leader
KCSie – Keeping Children Safe in Education (Statutory guidance – September 2018)
DBS – Disclosure and Barring Service
CLA – Child Looked After
LSCP – Local Safeguarding Children Partnership
LADO – Local Authority Designated Officer
SLT – Senior Leadership Team
SGT – Safeguarding Team
NDCSFC – Notre Dame Catholic Sixth Form College

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1. **Mission Statement**

At Notre Dame Catholic Sixth Form College, we are extremely proud of all our students' achievements, especially the individual progression that they each make in their time with us.

Our aim is to offer a 'World Class Catholic Education' by providing the best care, support and outcome for each individual student. As a Catholic College, we make Christ known to all members of our extended community through the way we work and the way we act. The values of **faithfulness, humility, truth, forgiveness, tolerance, dignity, service and respect** are at the centre of our teaching and guidance.

Our Mission and Ethos

'At the centre of our ethos is the dignity and uniqueness of each person'

2. **Introduction**

NDCSFC fully recognises its role in safeguarding and promoting the welfare of its students and works within the national and local guidelines. To protect and support students is rooted within the Catholic faith and our understanding that they are persons made in the image and likeness of God. We aim to support our students through building healthy self-esteem, self-worth and good mental health. We seek to protect those who are vulnerable in our community fulfilling our Catholic duty.

Safeguarding: Safeguarding means protecting children from abuse and maltreatment preventing harm to children's health or development ensuring young people grow up with the provision of safe and effective care taking action to enable all children and young people to have the best outcomes.

'young people' includes everyone under 18 and all vulnerable adults

Where a young person is suffering significant harm, or is likely to do so, action should be taken to protect that young person. Action should also be taken to promote the welfare of young people in need of additional support. NDCSFC has statutory duties to assist various agencies such as the Police and Social Care with their enquiries where they reasonably suspect that a young person is at risk.

NDCSFC seek:

- To prevent harm to young people by creating a safe environment where learning can take place.
- To take appropriate action to ensure young people are kept safe within the College as far as possible.
- To ensure that students know there are adults in the College whom they can approach if worried or in difficulty
- To endeavour to maintain effective working relationships with parents
- To provide opportunities for students to equip themselves with skills they need to keep safe
- To promote effective working relationships with outside agencies such as the Police, Social Services and other partners.
- To always act within the best interest of the young person with love, compassion and Christian values.

It is fully acknowledged that it is everyone's responsibility to safeguard children and provide a safe environment in which children can learn and that all professionals should make sure their approach is child-centered. This means that they should consider, at all times, what is in the best interests of the young person. (KCSiE 2018). The DSL is the Assistant Principal for students and the two DDSLs are the Pastoral Manager and the Student Services Manager.

3. **Legal Context and Framework**

The policy takes into account consideration the following statutory provisions:

- Children Act 1989 (as amended 2004 Section 52)
- Education Act (2002 s175/s157)

- Care Act 2014
- The Counter-Terrorism and Security Act (2015, section 26)

It is also compliant with:

- 'Keeping Children Safe in Education' (September 2018)
- 'Working Together to Safeguard Children' (July 2018)
- What to do if you're worried a child is being abused' (March 2015)
- Ofsted: Safeguarding children and young people and young vulnerable adult's policy.

4. The aims of the Policy

- Ensure that the College complies with statutory Child Protection guidelines.
- Give clear guidance and training to staff on how to respond when a case of harm, neglect or abuse is suspected.
- Ensure that all staff are aware of their responsibilities in their dealings with young people
- Ensure a prompt and effective response when concerns are raised
- Ensure that staff are adequately trained in recommended procedures to keep themselves safe
- Ensure that all staff understand the role of the Designated Senior Leads and key staff are known and their roles understood.

NDCSFC recognises its responsibilities with regard to the protection of young people from abuse and from inappropriate and inadequate care, and it is committed to acting in accordance with the guidelines in all cases where there is a concern. The main purpose of this document is to outline the policy procedures that should be adopted should any member of staff have cause to be concerned that a young person is being neglected or subject to abuse (including specific safeguarding issues such as Child Sexual Exploitation, Female Genital Mutilation and Forced Marriage) and to support staff in safe working practices as outline in safeguarding legislation and procedures in the Prevent Duty.

Our role in the prevention of abuse

The DSL and SGT have a role in creating opportunities for students to develop skills, concepts, attitudes and knowledge to promote and ensure their safety and well-being. These skills will be addressed through the curriculum, tutorials and assemblies ensuring that members of the college community are treated with respect and dignity, feel safe, and are listened to in-line with promoting a Catholic ethos which fosters self-worth and respect for us all as children of God.

Our role in supporting children and young people

We will offer appropriate directed support to individuals who have experienced abuse or who have abused others. In these cases, an individual support plan will be devised, implemented and reviewed regularly should the student require additional pastoral support/intervention. This plan will detail areas of internal and external sources of support, who will be responsible for the plan and the young person's wishes and feelings. Details of the support plan will be kept recorded appropriately.

Children and young people with additional needs

NDCSFC recognises that whilst all young people have a right to be safe, some children may be more vulnerable to abuse e.g. those with a disability, special educational needs and a range of other specific circumstances. The College follows the Leeds LSCP online multi-agency procedures and will, where necessary, have due regard to the government guidance for children in specific circumstances.

5. ROLES AND RESPONSIBILITIES

All adults working with young people in NDCSFC have a duty of care towards young people. There are key people within NDCSF who have specific responsibilities under Child Protection procedures.

a. Governing Body

The Governing Body should ensure that:

- They comply with their duties under legislation and have regard to the KCSiE2 guidance to ensure that the policies, procedures and training in the College are effective and comply with the law at all times
- The College has a Named Governor for Child Protection to take leadership responsibility for the organisation's safeguarding arrangements
- The College has an effective Safeguarding and Child Protection Policy and procedures in place in order for appropriate action to be taken in a timely manner to safeguard and promote young people's welfare. This policy should describe procedures which are in accordance with government guidance and are in keeping with locally agreed inter-agency procedures put in place by the Local Safeguarding Children Board (LSCP), be updated annually, and be available publicly
- The college pays full regard and commitment to following the safer recruitment, selection and pre-employment vetting procedures as outlined in KCSiE (2018). The College maintains a Single Central Record which demonstrates the relevant vetting checks required. A proportional risk based approach will be taken to the level of information that is provided to temporary staff and volunteers.
- All recruitment materials will include reference to the college's commitment to safeguarding and promoting the wellbeing of pupils. The college will ensure that all recruitment panels include at least one person that has undertaken safer recruitment training as recommended by Leeds LSCP.
- The College has written recruitment and selection policies and procedures in place. The Governing body should prevent people who pose a risk of harm from working with young people by adhering to statutory responsibilities
- At least one person on any appointment panel has undertaken safer recruitment training
- The College has procedures for dealing with allegations of abuse against members of staff and volunteers. Such allegations should be referred to the designated officer at the local authority
- An annual review of its policies and procedures takes place
- The Chair of the Governing body deals with any allegations made against the Principal
- To always act within the best interest of the young person with love, compassion and Christian values.

Neither the Governing body, nor individual Governors, have a role in dealing with individual student cases nor a right to know details of cases, except where exercising their disciplinary functions in respect of allegations against a member of staff.

To support the Governing Body with their fulfilment of their duties they will receive safeguarding training.

b. The Principal

The Principal will ensure that:

- The policies and procedures adopted by the Governing Board, particularly concerning referrals of cases of suspected abuse and neglect, are fully implemented and followed by all staff
- The contents of the College's 'Recruitment and Selection Policy and Procedures' is fully adhered to, including ensuring that:

- All new staff and volunteers undergo an Enhanced DBS3 check, a Barred List check (where appropriate), identity check, two reference checks and statutory qualification check before employment commences. This applies to all staff and volunteers who are engaged in regulated activity
- The selection of new staff will include a review of the application form including employment history and a formal selection process as appropriate for the role
- On the rare occasion that there is a need for employment to commence without the outcome of the enhanced DBS3 being verified such staff will have a **risk assessment** undertaken which must be approved by the Principal or Deputy Principal prior to employment commencing
- Any member of the college community who is placed on the sex offenders register will have their employment terminated immediately, or, if that member of the community is a student, it is likely they will be permanently excluded from the college depending on the result of a risk assessment
- Sufficient resources and time are allocated to enable the DSL and other staff to discharge their responsibilities, including taking part in strategy discussions and other inter-agency meetings, and contributing to the assessment of young people
- All staff and volunteers feel able to raise concerns about poor or unsafe practice regarding young people, and such concerns are addressed sensitively and effectively in a timely manner
- To always act within the best interest of the young person with love, compassion and Christian values.

c. Designated Safeguarding Lead (DSL)

NDCSFC has one DSLs and two DDSLs who take lead responsibility for safeguarding and child protection. This responsibility is explicit in the job description for the role of Assistant Principal (Students); in their absence, the Principal will assume responsibility. Leeds Front Door provides advice and support to the DSL.

The Designated Safeguarding Leads will:

i) Manage Referrals

- Refer cases of suspected abuse to the local authority children's social care as required
- Refer cases to the Channel Programme where there is a radicalisation concern as required, in line with the Channel process, in line with the process shown in Appendix A.
- Refer cases where a person is dismissed or left due to risk/harm to a young person to the Disclosure and Barring Service
- Refer cases where a crime may have been committed to the Police as required
- Follow referral guidelines outlined by Leeds Safeguarding Children Board. LSCP procedural guidelines, including thresholds, can be found on the Leeds Safeguarding Children Board website:

<https://www.leedsscp.org.uk/Home>

ii) Work with others

- Liaise with the Principal to inform of any issues and ongoing investigations and ensure there is always cover for this role
- Seek supervision with Safeguarding Staff on matters of safety and safeguarding and when deciding whether to make a referral by liaising with relevant agencies. Act as a source of support, advice and expertise for staff
- Contribute to inter-agency working in line with statutory guidance Working Together to Safeguard Children. The College, mainly through the DSL, will work closely with social care, the police, health services and Leeds's Children's Board to promote the welfare of children and protect them from harm. The DSLs will access advice and guidance from relevant external agencies.

- Provide a co-ordinated offer of early help when additional needs of young people are identified and contribute to inter-agency plans to provide additional support to children subject to child protection plans
- Recognise the importance of information sharing between professionals and local agencies and refer to relevant guidance (Information sharing: Advice for practitioners) when doing so. It is recognised in respect of information sharing that whilst the Data Protection Act 1998 places duties on organisations and individuals to process personal information fairly and lawfully, it is not a barrier to sharing information where the failure to do so would result in a young person being placed at risk of harm. Fears about sharing information cannot be allowed to stand in the way of the need to promote the welfare and protect the safety of young people. To aid effective information sharing the College will refer to the 7 Golden Rules of Information Sharing as outlined in HM Government guidance on Information Sharing

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/419628/Information_sharing_advice_safeguarding_practitioners.pdf

iii) Training

DSL training:

- The DSLs will undergo training to provide them with the knowledge and skills required to carry out this role; this training should be updated at least every two years.
- The DSLs will undertake Prevent awareness training.
- In addition to formal training, their knowledge and skills should be refreshed at regular intervals, as required, but at least annually, to allow them to understand and keep up with any developments relevant to the role:
 - Understanding the assessment process for providing early help and intervention.
 - Knowledge of how local authorities conduct a child protection case conference and review conference. Where possible, and in most cases, it is expected a DSL will be able to attend and contribute to these effectively when required to do so
 - Being alert to the specific needs of children in need, those with special education needs and young carers
 - Being able to keep accurate and secure records of concerns and referrals
 - Supporting the College with regards to the requirements of the Prevent duty and be in a position to provide advice and support to staff on protecting children from the risk of radicalisation
 - Encouraging a culture of listening to young people and taking account of their wishes and feelings

Role of DSL for staff training:

- Ensure each member of staff has access to and understands the College's Safeguarding and Child Protection Policy and procedures
- Ensure all staff members receive appropriate safeguarding and child protection training which is regularly updated
- Ensure all staff member receive safeguarding and child protection updates as required, but at least annually, to provide them with the relevant skills and knowledge to safeguard children effectively
- Manage staff training to enable staff to recognise and identify signs of abuse, when it is appropriate to make a referral and how this should be done
- The DSL, the SGT and the nominated governor for child protection will attend relevant training at intervals of no longer than two years. The Principal will be properly briefed on child protection and safeguarding issues.
- All other staff will receive training on how to handle disclosures as part of their induction. Annual training for all staff will also be organised.

iv) Raising Awareness

- Ensure the College's **Safeguarding and Child Protection Policy is updated and reviewed annually** and the procedures and implementation are updated and reviewed regularly, and work with the Governing Board regarding this
- Ensure the College's Safeguarding and Child Protection Policy is known, understood and used appropriately
- Ensure the College's Safeguarding and 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 the College in this

- Link with the local LSCP to make sure staff are aware of training opportunities and the latest local policies on safeguarding
- The DSL will take lead responsibility for dealing with child protection issues, providing advice and support to other staff, liaising with the LEA, and working with other agencies. The DSL will have the status and authority within the College's management structure to carry out the duties of the post including committing resources to child protection matters, and where appropriate, directing other staff
- All other staff in college will undertake training to equip them to carry out their responsibilities for child protection effectively, which will be kept up to date by refresher training. Temporary staff and volunteers who work with children will be made aware of the College's arrangements for child protection and their responsibilities

v) Risk Assessments

Where risk and vulnerability are known [for example; those with a learning difficulty, or looked after children], the College prepares for the young person in terms of liaising with High Schools, College staff and carers as appropriate. These actions may be taken by the DSL, Learning Support Manager or a member of the Pastoral Team. As with all students any safeguarding concerns should be passed on to the DSL.

vi) Vulnerable Young Person

The College recognises that some young people are particularly vulnerable and may require enhanced support during their time at college.

The College recognises that each individual may require, or prefer, different levels of monitoring and support. We will therefore endeavour to agree individual support with the young person, and appropriate parties, based on their individual circumstance and progress.

Whilst this is not an exhaustive list the College classifies the following as indicators of increased vulnerability:

- **Child Looked After**

On the identification of a CLA the DSL's will seek to obtain, and record, further information in relation to the young person's looked after legal status, with due regard to KCSiE2 guidance (page 20). The DSL will liaise with the Student Services Manager to check what additional financial arrangements may be available. In discussion, and agreement, with the young person and appropriate parties, an appropriate level of additional support will be offered to the student.

- **Young Carer**

On the identification that a young person is a Young Carer the DSL will gather relevant information to consider what additional support is suitable. A leaner flag will be set on CEDAR to inform teachers.

- **Pregnancy**

A student who is pregnant should be referred to the DSL and Catholic Care to discuss any additional support requirements and for a risk assessment to be arranged with Estates (Health and Safety).

- **Parent**

A student who is a parent will be referred to Student Services to check appropriate financial support is in place and will have a flag on CEDAR to inform teachers.

- **Gender identity/ Transgender Students**

Support will be provided for individual students.

- **Special Educational Need and Disability (SEND)**

Young people with special educational needs (SEN) and disabilities can face additional challenges and the College is aware that additional barriers can exist when recognising abuse and neglect. Staff should ensure that indicators of possible abuse, such as behaviour, mood and injury do not automatically relate to the young person's disability and be conscious, where appropriate, to consider further exploration. Staff should be vigilant that young people with SEN/disabilities may be disproportionately impacted by things, such as bullying and that communication barriers may exist that make it more difficult to recognise this. Further information of the College's support for SEND students can be viewed in the Special Educational Need and Disability Policy.

- **Domestic Violence:**

Where a member of staff is aware of incidents of violence between adults in households where there are young person's attending college, they will share these concerns with the DSL. The DSL will consider the need for a formal referral to the Social Services Department / Police based on professional judgement and the level of any potential/actual risk to the individual or their siblings. Where police NV notifications are received, a member of the SGT will meet with the student that day to discuss support requirements.

In all of these examples the young person will have access to a Tutor who are responsible for their day-to-day monitoring and available for pastoral support and guidance. Academic progress can be supported via CEDAR and additional support can be accessed through the Learning Support team. Information will be shared proportionately with relevant college personnel.

vii) Child Protection Files Transfer

- NDCSFC will request to all schools that child protection files OR the FE safeguarding information form, are transferred securely as set out in 'The Education Regulations' (2005). It is understood that consideration will first be given to the pupil's wishes and feelings about their child protection information being passed on and that schools may retain original copies.
- When an individual about whom there are child protection concerns leaves the College, the College will endeavour to transfer the information to the individual's new college/school, if appropriate, as soon as possible.

viii) Information sharing

We recognise the need to effectively share information with partner agencies to help identify, assess and respond to risk whilst having due regard for The Data Protection Act and GDPR (2018). We appreciate that GDPR is not a barrier to sharing safeguarding information but acts as a framework to ensure personal information is shared appropriately.

NDCSFC will comply with information requests from partners within the multi-agency system, as outlined in 'Working Together to Safeguard Children' (July 2018) and will contribute to all reports. When there is a concern that a child is at risk of significant harm, all information held by the establishment will be shared with Children's Social Care, police and health professionals, in line with Section 47 of the Children Act (1989) and sections 10 and 11 of the Children Act (2004).

ix) Recording keeping

- All concerns, discussions and decision made and the reasons for those decisions should be recorded. Records should be stored in a secure area of CEDAR which is only accessible by authorised personnel who have designated safeguarding responsibilities. The College will comply with data protection legislation. The DSL will review young people with secure safeguarding CEDAR records so that any concerning patterns of behaviour can be identified and acted upon accordingly. In cases of alleged child abuse which come to court, the court may require the college to provide its child protection records. Similarly, Counselling logs can also be called for scrutiny if a serious allegation is made. The DSL records should include action taken in the cases where:
 - There is suspected child abuse
 - Where a young person had their name on a Child Protection Plan.

6. Safeguarding - All staff

a. Introduction

KCSiE2 recognises that colleges and their staff are an important part of the wider safeguarding system for children, particularly because they are able to identify concerns early, provide help for young people and prevent concerns from escalating.

All staff have a responsibility to safeguard and promote the welfare of young people act on any suspicion or disclosure that may suggest that a young person or vulnerable adult is at risk of any form of harm, and to identify young people who may benefit from early help and support.

The stress on staff involved in any aspects of child protection work is considerable and the College will ensure that such staff are properly supported. The Principal and the DSL will be responsible for supporting the staff concerned and, where necessary, seek help from outside the college.

All members of the College staff should be aware of systems within the college which support safeguarding, including:

- **The Safeguarding and Child Protection Policy**
- **The College Designated Safeguarding Team** and their role
- **Keeping Children Safe in Education (Part 1 - Information for all school and college staff)**

A key responsibility of staff is to be aware of the forms of abuse and neglect a young person may be subject to, be prepared to identify them and know what action to take should they be suspicious or receive a disclosure. Where staff have a safeguarding concern for a young person there should be a referral to the Designated Safeguarding Team Lead.

All staff will:

- read and be familiar with 'Keeping Children Safe in Education' Part 1 and Annex A (DfE 2018);
- remember that the child's welfare and best interests must be the paramount consideration at all times;
- be familiar with the college's child protection policy and procedures, including issues of confidentiality;
- be alert to signs and indicators of possible abuse, exploitation and radicalisation and maintain a culture of vigilance;
- deal with a disclosure of abuse from a child in line with College procedures and record concerns accurately on the relevant forms. These must be passed to a member of DST immediately. Staff should not take it upon themselves to investigate concerns or make judgments;
- be involved in on-going monitoring and recording to support the implementation of individual education programmes and inter-agency child protection and child support plans; take an active role in educating young people on all safeguarding issues;
- be subject to Safer Recruitment processes and checks, including DBS, whether they are new staff, supply staff, contractors, governors, volunteers etc.;
- be expected to behave in accordance with Guidance for Safer Working Practice for those Working with Children and Young People in Education settings (Safer Recruitment Consortium October 2015).
- always act within the best interest of the young person with love, compassion and Christian values.

b. Forms of abuse and neglect and other safeguarding issues

Abuse is defined as a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Young people may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others (e.g. via the internet). They may be abused by an adult or adults or by another young person or young people.

- **Physical Abuse:** Physical abuse may involve hitting, shaking, burning or scalding, drowning, suffocating or otherwise causing physical harm to a young person. It may be done deliberately or recklessly or be the result of a failure to prevent injury occurring. Physical harm may also be abused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a young person.
- **Neglect:** Neglect is the persistent failure to meet a young person's basic physical and/or psychological needs likely to result in the serious impairment of the young person's health or development.
- **Emotional Abuse:** The persistent emotional maltreatment of a young person such as to cause severe and adverse effects on the child's emotional development. It causes adverse effects on the young person's behaviour and emotional development and can result in feelings of low self-worth. A level of emotional abuse is involved in all types of maltreatment of a young person, although it may occur alone.
- **Sexual Abuse:** This involves forcing or enticing a young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the young person is aware of what is happening. Perpetrators of sexual abuse can be adult males, women or other young people.
- **Sexual violence and sexual harassment**

As outlined in DFE Guidance (Dec 2017), sexual violence and sexual harassment can occur between young people of either sex and may involve a single or a group of perpetrators. Sexual violence and sexual harassment exist on a continuum, may overlap and may be physical, verbal, person to person or online.

- **Peer on peer abuse**

We recognise that young people can be capable of abusing their peers and that peer on peer abuse can manifest in many different ways, including: on-line bullying, sexting, initiation/hazing and inappropriate/harmful sexualised behaviours. Where young people have exhibited inappropriate/harmful sexualised behaviour, the DSL will instigate a coordinated multi-agency approach in consultation with Leeds Social Care through a risk and vulnerabilities management plan (RVMP), which may include, parent/carers, police, youth justice children's social work service and health professionals. We will ensure that the needs of young people who abuse others will be considered separately from the needs of their victims. Young people who abuse others will be responded to in a way that meets their needs as well as protecting others within the school community through a multi-agency risk assessment.

If the alleged perpetrator also attends NDCSFC, a risk assessment will be undertaken to minimise the likelihood s/he will not come into contact with the victim whilst the police/college establish the facts of the case and until any criminal prosecution is completed. Should the investigation result in a conviction or caution, permanent exclusion of the perpetrator will be considered.

- **Sexual harassment** is the unwanted conduct of a sexual nature, often based on a power imbalance, that violates a young person's sense of dignity and leads to feelings of shame, degradation and intimidation. Sexual harassment may include: lewd comments, sexual taunting, physical behaviour such as unwanted touching or upskirting and online abuse such as non-consensual sharing of sexual images. Such behaviour will not be tolerated at NDCSFC, will not be seen as 'banter' or 'humour' and will result in sanctions such as exclusion being considered. Staff will challenge any exchanges that are seen as harassment and will report them immediately to the SGT.

Sexting – The College informs and reminds students of the law regarding the creation and sharing of sexual images and videos of under 18s. When an incident involving youth-produced sexual imagery is discovered or disclosed, the DSL will investigate, interviewing the relevant young people to find out how widely the image has been shared, its host location and its content (the DSL will avoid viewing the image).

The DSL will then:

- contact the police if the people involved are under 18; or if the images may relate to grooming, blackmail or coercion; or the images are violent or extreme
- consider sharing information with parent/carer, taking the student's wishes into consideration
- contact NetAware and the Internet Watch Foundation to try and have the image taken down

At all times, the focus will be on safeguarding the young person rather than criminalising the behaviour.

- **Child Sexual Exploitation:** Child sexual exploitation (CSE) involves exploitative situations, contexts and relationships where young people receive something (for example food, accommodation, drugs, alcohol, gifts, money or in some cases simply affection) as a result of engaging in sexual activities. Sexual exploitation can take many forms ranging from the seemingly 'consensual' relationship where sex is exchanged for affection or gifts, to serious organised crime by gangs and groups. What marks out exploitation is an imbalance of power in the relationship. The perpetrator always holds some kind of power over the victim which increases as the exploitative relationship develops. Sexual exploitation involves varying degrees of coercion, intimidation or enticement, including unwanted pressure from peers to have sex, sexual bullying including cyberbullying and grooming. However, it is also important to recognise that some young people who are being sexually exploited do not exhibit any external signs of this abuse.

Also known as County Lines, CCE (child criminal exploitation) refers to the use of young people under 18 to aid the supply of drugs to rural and coastal areas by urban gangs. Given the inner city location of NDCSFC, staff should be alert to signs of such exploitation (absences from college and home, unexplained acquisition of money or valuable items such as new mobile phones, excessive receipt of texts/phone message in college hours etc.) and which students may be vulnerable to such abuse. The DSL, in conjunction with the Catholic Care Social Worker, will refer such concerns to Leeds Safeguarding Board.

- **Honour Based Violence (HBV), including Female Genital Mutilation (FGM) and Forced Marriage**
So-called; honour-based' violence (HBV) encompasses crimes which have been committed to protect or defend the honour of the family and/or the community, including FGM and forced marriage. All forms of so called HBV are abuse (regardless of the motivation) and should be handled and escalated as such.
FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences. Section 5B of the Female Genital Mutilation Act 2003 places a statutory duty upon teachers to report to the police where they **discover** that FGM appears to be have been carried out on a girl under 18. Those failing to report such cases will face disciplinary sanctions. Teachers must personally report to the police cases where they discover that act of FGM appears to have been carried out; although they should still involve the Designated Safeguarding Leads and, where appropriate, Children's Social Care.
In suspected cases of FGM, where a teacher suspects a girl may be at risk, and in cases relating to girls aged 18 or over teachers should discuss their concerns with a DSL. The DSL will follow the College's normal safeguarding procedures and involve children's social care as appropriate.
- **Forced Marriage:** Forcing a person into a marriage is a crime in England. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any form of coercion is used to cause a person to enter into a marriage.

Any concerns or suspicions of so-called HBV, including FGM and Forced Marriage, should be discussed directly with a member of the Safeguarding Team, or the Principal in their absence.

Preventing Radicalisation

- Radicalisation is defined as the process by which people come to support terrorism and violent extremism and, in some cases, to then participate in terrorist groups.
- The Counter-Terrorism and Security Act places a duty on specified authorities, including education providers, in the exercise of their functions, to have due regard to the need to prevent people from being drawn into terrorism ("the Prevent duty"). Colleges which are required to have regard to KCSiE2 are listed in the Act as partners of the panel. The College has a designated Strategic Lead for the Prevent Duty, this is the Vice Principal and a Single Point of Contact which is a designated Director of Students.
- Prevent awareness training is provided to equip staff to identify students at risk of being drawn into terrorism and to challenge extremist ideas. Staff are informed to be alert to the possible signs of radicalisation and are informed to pass any such concerns to the College DSLs.
- Staff should understand their role with regard to 'the Prevent Duty'. Where there is concern for a student(s) the College will refer to the 'Channel Referral Process'. As per KCSiE2 any concerns in relation to possible radicalisation may be discussed with parents unless there is a specific reason to believe that to do so would put the student at risk.
- The College's IT policy is reviewed and updated to conform with the College's approach to preventing radicalisation.
- Further information on the Colleges approach to preventing radicalisation can be viewed in the Prevent Position Statement and the Prevent Risk Assessment and action plan.

Any concerns or suspicions of possible radicalisation should be discussed directly with a member of the Safeguarding Team, or Principal in their absence.

<https://www.leeds.gov.uk/docs/102%20-%20Radicalisation%20and%20preventing%20extremism.pdf>

On line safety

The use of technology has become a significant factor in many safeguarding issues as it provides a platform that potentially facilitates abuse in cases of CSE, radicalisation, sexual predation etc. As such, we recognise the need to safeguard NDCSFC students from potentially harmful and inappropriate material on line.

KSIE (2018) highlights three area of risk:

- Content – being exposed to illegal, harmful or inappropriate material
- Contact – being subjected to harmful online interaction
- Conduct – personal online behaviour that increases the likelihood of, or causes, harm

Smoothwall filters are used to alert the SGT if a student attempts to access inappropriate sites. The DSL will investigate concerns and this may include reviewing the student's browsing history and discussing the concern with the student and parent/carer. As part of the College's tutorial project, students will be informed about safe on-line practice and how to report concerns.

Children Missing from Education

A young person going missing from education is a potential indicator of abuse or neglect. In conjunction with the College's attendance officer, a member of the Safeguarding Team should be alert for students who absence is unexplained and, for an absence of more than five days, should make reasonable attempt to contact home and establish their whereabouts. A home visit by Catholic Care SW will be made if no phone contact is made.

Mental Health

NDCSFC recognise the growing need for addressing students' mental health needs and seek to be proactive in supporting students to maintain academic progress in the face of health challenges. The College also recognises that it's Christian duty is to support vulnerable young people to achieve tier potential. Staff should alert a member of the Safeguarding Team if they have concerns about a student. Students will then be supported and signposted to appropriate internal and external sources of support. NDCSFC has a number of Mental Health First Aiders (staff and students) who may be involved in supporting acute individuals. Mental health issues that may impact on young people include, but not exclusive to, anxiety, self-harm, suicidal ideation.

The College's SEND policy refers to the support offered for students with Social, Emotional and Mental Health Difficulties.

Other

- All staff should have an awareness of safeguarding issues in addition to those above; examples (but not exhaustive) are available in KCSiE2 (September 2016 - Page 12) and are listed on the staff safeguarding lanyard cards and office posters. Staff should be aware that behaviours linked to the likes of drug taking, alcohol abuse, truancing and sexting put young people in danger.
- All staff should be aware that safeguarding issues can manifest themselves via peer on peer abuse. This is most likely to include, but not limited to, bullying (including cyber bullying), gender based violence/sexual assaults and sexting. **Staff should be clear to discuss any such concerns with the College's Designated Safeguarding Leads immediately.**
- Expert and professional organisations are best placed to provide up-to-date guidance and practical support on specific safeguarding issues and links to relevant organisation are available from members of the Pastoral Team and can be found on Moodle. **Advice and guidance can, and should, be sought from the College's Designated Safeguarding Leads.**

c. Identifying abuse, neglect and safeguarding concerns:

Staff should be aware that abuse, neglect and safeguarding issues are rarely standalones events that can be covered by one definitive or label. In most cases, multiple issues will overlap with one another. Below is not a definitive list but some of the signs that may become apparent to staff and should read alongside **KCSiE Part 1** and **Annex A**.

Some Signs of Abuse	
Unexplained bites, burns or bruises	Continual self-deprecation
Admission of punishments to self or siblings which is significant	Fear of new situations/ persons
Shrinking from physical contact	Inappropriate emotional responses
Fear of returning home or parents being contacted	Self-harm
Fear of medical help	Compulsive stealing/ scrounging
Aggression or bullying	Drug or alcohol abuse
Unexplained patterns of absences/ poor, sporadic attendance	Detachment / 'don't care'
Eating disorders	Attention-seeking behaviour

d. Procedures for dealing with a child or young person at risk of serious harm

Where it is believed that a young person is suffering from, or is at risk of serious harm, we will follow NDCSFC’s and the LSCP’s child protection and safeguarding procedures. If a member of staff becomes aware that a young person may be at risk of serious harm or is suffering from abuse, s/he is responsible for informing the DSL, or a member of the SGT.

- If a young person discloses abuse, the member of staff must make clear that the information will be passed on. Details of the conversation should be recorded verbatim and these notes passed to the DSL. A Wellbeing Referral form should be completed.
- When abuse is disclosed, the SGT should gather sufficient information to establish a genuine cause for concern, and will take care to avoid possible contamination of evidence in the event of any future police action.
- The DSL will decide on action to be taken and will, where appropriate, liaise with other agencies as soon as possible;
- Secure child protection notes will be added to Cedar (electronic chronology).
- Parents/carers will be informed regarding the decision to make a referral except in cases where this may increase the risk of harm to the young person or where it may otherwise undermine an investigation. The young person’s wishes will always be considered.

Staff can at any time seek advice and guidance on safeguarding by meeting with a member of the College’s Safeguarding Team.

Any noticeable change in behaviour, appearance, attendance can be a possible cause for concern.

Do:	Do Not:
Be observant	Delay
Act promptly for concerns at any ‘level’	Make assumptions or judgements
Be aware of your position of trust / duty of care	Panic
Stop, listen and keep calm	Make a promise
Use open questions	Ask leading questions
Report promptly to the DSL	Criticise
Record accurately	Carry out an investigation
Keep the student informed	Keep sensitive information to yourself
Remember that the learner’s welfare is the paramount consideration	Keep concerns to yourself
Utilise available help, support and expertise; ask if you’re not sure!	

e. Early help

Early help means providing support as soon as a problem emerges at any point in a young person’s life. All staff should be alert to identifying where a young person may benefit from early intervention. Staff should discuss possible early help requirements with a student’s Tutor and/or a DSL. Where other agencies and/or professionals are involved in an early help assessment or providing support, staff may be required to provide support. In cases of early help intervention, a DSL will consider the most appropriate support package based on the individual circumstances of the individual. This may include seeking advice or support from external agencies such as Leeds Safeguarding Board. Parental agreement for an early help referral will usually be requested by a conversation with a parent and a DSL. Where a young person is identified as benefiting from early help a range of support can be offered from within college.

f. Confidentiality

-Information will only be shared on a ‘need to know’ basis.

-It is paramount that staff NEVER guarantee confidentiality to a young person and must never agree to ‘keep a secret’ as outlined in Safer Working Practice for Adults who work with Children and Young People in Education Settings (2015).

g. Acceptable Restraint

The College follows the guidance as outlined in the DFE publication and recommended by the LEA:

Use of Reasonable Force: advice for school [or, for the purposes of this policy, College] leaders, staff and Governing Bodies which can be accessed via:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/444051/Use_of_reasonable_force_advice_Reviewed_July_2015.pdf

This is non-statutory advice from the Department for Education. It is intended to provide clarification on the use of force to help staff feel more confident about using this power when they feel it is necessary and to make clear the responsibilities of school leaders and governing bodies in respect of this power.

h. What staff should do if they have concerns about another staff member

As outlined in KCSiE2 if staff members have concerns about another staff member, then this should be referred to the Principal. Where there are concerns about the principal, this should be referred to the chair of governors. Staff may consider discussing any concerns with the College's Designated Safeguarding Lead and make any referral via them.

i. What staff should do if they have concerns about safeguarding practices within college

All staff and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in the college safeguarding regime and know that such concerns will be taken seriously by the Senior Leadership Team. The College aims to promote a safe, comfortable and transparent environment where such concerns can be discussed appropriately.

Where a staff member feels unable to raise an issue other whistleblowing channels may be open to them. Guidance for this is outlined in KCSiE2 (page 9).

j. Relationships between staff and students

The College aims to provide a working and learning environment which enables staff and students each to realise their full potential and contribute to a vibrant and mutually supportive community. The College is keen to ensure that students' experience at the College is maximised, and acknowledges that as a part of achieving that goal, staff (both teaching and support staff) will form mutually rewarding and professional relationships with students.

However, to protect staff and students, the boundaries of personal and professional life must be fully recognised and respected.

Under the Sexual Offences Act 2003 it is a criminal offence for a person aged 18 or over ('A') to engage in prescribed sexual activity (including touching) with someone under the age of 18 ('B') where A is in a position of trust in relation to B. For these purposes, a position of trust includes where A looks after (including having responsibility for) persons under 18 who are receiving education at an educational institution and B is receiving education at that institution. The College also strictly prohibits any such activity.

In addition, any relationship which could impair professional judgement, compromise integrity or affect the proper teaching or reputation of the College must be avoided.

For the purposes of this policy, an 'Intimate Relationship' includes:

- a. any sexual or romantic relationship whether a heterosexual or same sex relationship'; and/or
- b. any relationship which could impair professional judgement, compromise integrity or affect the proper teaching or reputation of the College.

The College strictly prohibits intimate relationships between members of staff and students of the College. In order to protect the welfare of members of staff and former students, to preserve the reputation of the College and to avoid incidents and allegations of impropriety, bias, abuse of authority, discrimination and harassment, conflict of interest, favouritism and potential disruption to the teaching and learning environment, the College strongly discourages any sexual or romantic relationship (whether a heterosexual or same sex relationship) between members of staff and former students of the College (including, in particular, any individual whose student relationship with the College ceased in the previous 12 months and/or who is under the age of 18).

Staff should be aware that a breach of this policy could lead to action under the College's Disciplinary Policy and

Procedure, including sanctions up to and including dismissal.

k. Allegations of abuse made against teachers and other staff:

Where there are concerns about abuse by a member of staff, the Principal must be informed immediately. The procedures for dealing with allegations need to be applied with common sense and judgement, and will follow guidance as set out in KCSiE2 (Part four).

Any allegation of abuse made against a teacher or other member of staff or volunteer will be dealt with very quickly, in a fair and consistent way that provides effective protection for the child and at the same time supports the person who is the subject of the allegation.

The LADO will give appropriate advice on how to manage the allegation.

The Principal should inform the accused person about the allegation as soon as possible after consulting the LADO. However, where a strategy discussion is needed, or police or children's social care may need to be involved, the Principal should not do that until those agencies have been consulted, and have agreed what information can be disclosed to the person. If the person is a member of a union or professional body s/he should be advised to contact that body at the outset.

Suspension should be considered in any case where there is cause to suspect a young person is at risk of significant harm, or the allegation warrants investigation by the police, or is so serious that it might be grounds for dismissal. However, a person must not be suspended automatically, or without careful thought. In cases where it is decided on the conclusion of the investigation that a person who has been suspended can return to work, the college should consider how best to facilitate that.

Any staff/volunteers who are dismissed by the college for gross misconduct or cumulative misconduct relating to safeguarding of children/young people will be referred to the DBS for consideration of barring. Similarly, where the college has a reasonable belief that the member of staff/volunteer would have been dismissed by the college had they been employed at the time of the conclusion of investigations will be referred to the DBS. The college will keep written records of all of the above.

Where a staff member feels unable to raise an issue with their employer or feels that their genuine concerns are not being addressed, staff can contact any of the professionals named in the above paragraph, in addition to other whistleblowing channels which may be open to them.

To minimise the risk of unfounded allegations being made, staff should be aware of our Social Networking Guidance for Staff, Email Use Policy and our Acceptable Use Policy. The College's Induction training for new staff advises against the use of social networking sites with students and giving students access to personal mobile phone numbers or email addresses.

Caveat: Any allegation should be treated in the context of the circumstance and with careful communication with the LADO and the police or children's social care if necessary. There may be exceptions to the passing on of information to parents depending on the nature of the young person's home circumstances.

<https://www.leedsscp.org.uk/LSCP/media/Images/LADONotificationFormJune2017.doc>

l. The College Counsellor

By nature of the role, works confidentially with students who are facing significant difficulties. It is College's Policy that the College Counsellor must be a fully qualified BACP accredited counsellor who will offer specialist programmes of support and therapy. The Counsellor works closely with the DSL in order to continue to review and undertake appropriate procedures and best practice and to make safeguarding referrals to the DSL or as appropriate. The counsellor seeks advice and support for her role through formal supervision with an external accredited agency.

The Catholic Care Social worker

In addition to working with individual students in need, **offers** support and advice to members of the SGT, including offering peer supervision, and works closely with Leeds Social Care team.

7. Safety, Security and Safeguarding of Students:

a. Introduction

Notre Dame Catholic 6th Form College aims to ensure that it creates and maintains a safe and secure environment for all students, staff and visitors.

In seeking to implement this aim the college recognises that the security of its community relies upon:

- A secure site
- The creation and maintenance of a culture where mutual respect is an expectation and inappropriate behaviour is not tolerated
- The creation and maintenance of an anti-bullying culture
- Addressing safeguarding and security issues with students by the inclusion of such issues in the education programmes of all students
- Staff challenging inappropriate behaviour and acting to resolve the situation where this is deemed necessary
- The Principal being notified of all incidents that involve threats or violence. A note will be placed on the student record and appropriate action will be taken
- A clear focus on the development of the student as a whole person which includes, in addition to their academic development, moral, spiritual and social development. Students are encouraged to cultivate virtues that promote human flourishing.
- Students being provided with a programme of study that includes tutorial provision with specific reference to personal safety and security issues affecting young people
- The continued use of the College counsellor being available for students
- Where appropriate and available outside agencies being used, and involved in delivering specialist advice and information to students
- Overall responsibility for the security of students rests with the Principal and the Senior Leadership Team

b. Security on Site

The College aims to maintain a safe and secure physical environment with effective external fencing and locked gates when college is closed. CCTV covers many areas of the site so that security and behavioural incidents can be followed up quickly.

During induction, all students are issued with identity cards and lanyards and are expected to have these visible at all times. After completing signing in process at reception, all visitors to college are issued with a VISITOR badge and red lanyard which must be worn. Visitors will be escorted around college by a member of staff. Only DBS-checked visitors will be allowed to work unsupervised with students.

c. Online Safety

KCSiE highlights three areas of risk:

- Online content
- Contact (being subjected to harmful interaction with others online)
- Conduct (personal online behaviour that increase the likelihood of, or causes, harm)

Students are taught about safeguarding, including online and sexting, through their Programme of Study.

d. Where a student is subject to criminal investigation

The College understands the power of education in improving the life chances of all young people including those who may have been involved in criminal activity.

Where a student is subject to a criminal investigation, college may suspend the student until the criminal investigation and legal proceedings have concluded. However, this does not automatically preclude college from progressing its own disciplinary action.

Parent/carers will be kept informed of any action taken and included in meetings/risk assessments, where appropriate. The student and parents/carers should be reminded that whilst criminal investigations are underway they are obliged to keep the College informed of any progress and/or change in status regarding his/her case.

Where the nature of the alleged offence suggests that there may be risk to the safety of others, or where the student

accused of the offence may be at risk of harm the College will undertake a risk assessment and take appropriate action.

e. Illegal Substances/Substance Abuse (including new psychoactive substances previously known as legal highs)

When responding to incidents of substance use, care should be taken to avoid overreacting to drug use and under reacting to drug misuse. National strategy aims to reduce drug related damage to young people's potential – care should be taken to ensure that sanctions do not adversely affect potential to a greater degree than the substance misuse.

The primary concern of the College is to minimise harm, to all parties, from substance misuse and to promote healthy lifestyle choices. The College will consider each drug/substance related incident individually and will recognise that a variety of responses will be necessary to deal with each incident.

The College is committed to:

- Facilitating the prevention of alcohol and drug misuse by education and training
- Actively discouraging the non-medical use of drugs both on and off College premises
- Recognising and accepting the College's legal responsibility under the Misuse of Drugs Act (1993) in not knowingly permitting any user of College premises or grounds to produce, supply, possess or be under the influence of any banned or illegal substance
- Taking appropriate action in any instance where there are learners or staff possessing, using, dealing or producing any banned illegal substance
- Taking appropriate action in incidents where drug misuse is suspected

Procedures for Implementing the Illegal Substances/Substance Misuse Policy

- The College does not permit students to bring alcohol or illegal substances (including psychoactive substances) on site at any time and does not allow the consumption of such substances whilst the college is in session
- If it is considered that the condition of the learner is likely to put them or others at risk, they must not be allowed to take part in any College activities. In extreme cases, it may be necessary to call an ambulance

f. Anti-Bullying

NDCSFC seeks to protect and support students and these values are rooted within the Catholic faith and our understanding that they are persons made in the image and likeness of God.

What is bullying:

Bullying is the wilful and conscious desire to undermine, hurt, frighten, threaten or intimidate another person. It can be any words or actions that are aimed at causing someone to feel frightened or miserable in College. Bullying can be physical, verbal or take the form of psychological pressure. Bullying can also take the form of abusive or threatening text messages, emails or web based text or images.

Three main types of bullying are:

- Physical: such as hitting, kicking or taking belongings
- Verbal: such as name-calling, insulting or making offensive remarks
- Indirect: such as spreading rumours, exclusion from social groups, sending malicious emails or texts

As a College, we are committed to not only dealing with bullying, but to do all that we can to stop it happening in the first place. The College has a duty to provide a safe and caring environment for all its students and staff and all members of the College community have a responsibility to establish this.

Where bullying is identified, positive steps must be taken to deal with any incidents and the College will take very seriously any reported incidents and act immediately.

Awareness of Possible Signs of Bullying

All staff are in ideal positions to observe changes in student behaviour which may indicate that they are being bullied. Staff should be aware of the student who:

- Becomes withdrawn or moody

- Becomes uncharacteristically withdrawn or argumentative
- Displays uncharacteristic aggressive or depressive behaviour
- Exhibits a sudden lowering of their self-esteem
- Shows a sudden decline in academic achievement
- Becomes agitated about missing possessions
- Develops unexplained injuries
- Is reluctant to eat
- Tells of sleep disturbances or nightmares
- Makes them aware of lack of money for food or transport

Taken individually these signs might not be because of bullying, but a combination of some of them could be a good reason to suspect it. In these incidents staff members, should report their concerns to the Designated Safeguarding Leads.

Students who are being bullied should:

- Talk to an adult that they trust
- Be made aware that it is the bully who is in the wrong – not them
- Be made aware that they will be taken seriously
- Be made aware that they will be safe whilst the incident is being investigated

Staff who become aware of a bullying situation must:

- Listen to the student
- Take it seriously
- Make it clear to the student that they have done the right thing by confiding in a member of staff
- Make it clear to the student that the information must be passed on and cannot be confidential
- Pass the information on to a Safeguarding Lead.
- Provide a written record using CEDAR

Bullying by text messages, web sites, social media and email:

- In this age of increasing communication by text, email and social media the College is aware that this may become an increasing problem. As such:
 - Students should be aware of their responsibilities when logging on to a College computer
 - Students should be careful to whom they give their phone number
 - Students should save any offensive messages
 - Students should show offensive messages to a chosen member of staff
 - Offensive texts, web threads, comments or emails will be taken as seriously as any other type of bullying

Procedures for dealing with bullying

Staff who suspect that a student is being bullied, who witness an incident of bullying, or in whom a student confides, should report the matter to a Designated Safeguarding Lead.

Parents who suspect that their son/daughter is being bullied should do the same by a phone call or a letter, and if possible by making an appointment to discuss the problem in College.

Students are encouraged to take appropriate action i.e. make a disclosure to a member of staff, if they, or another student, are victims of bullying. This member of staff could be anyone, but the expectation is that it will be a member of staff the student feels comfortable with.

When an incident is disclosed to a member of staff, the following procedures will come into place
The disclosure will be immediately reported to a member of the SGT who will take the following action:

- Meetings will be held with all appropriate people
- Where appropriate, parents of both the victim and the person accused will be informed and involved in any progress
- The College takes bullying very seriously and disciplinary action will be taken against anybody found to be the perpetrator of bullying which may include exclusion

8. Safeguarding - Parents

It is essential that parents are made aware of the college's responsibilities regarding child protection including that where a student is suspected to be suffering abuse or neglect a referral to external agencies may be made. This will be done by including the following statement in the prospectus and making the Child Protection and Safeguarding Policy available online.

Safeguarding

At Notre Dame Catholic Sixth Form College, every student really does matter, and parents and carers should be aware that the College will take any reasonable action to ensure the safety and wellbeing of its students. If you are worried about a student, you can contact the Pastoral Team at the College.

We recognise the damage that can be caused by bullying, in all its forms and have a zero-tolerance policy towards any behaviour that causes anxiety or distress to others. We regard each person as worthy of the utmost respect.

Useful Contacts Numbers

Police: 101 or 999 in an emergency

Social Services: 0300 123 6720

Team Manager Education and Year Early Years Safeguarding Team: Raminder Aujla –0113 3951211

Leeds Information Governance Hub: 0113 3784351

Duty & Advice: 0113 3760336

LADO: Ted O'Sullivan or Carolyn Hargreaves Tel: 0113 2478457

Local Authority Prevent Lead – Nadeem Siddique 07891 275424

Forced Marriage Unit 0207 008 0151

Harmful Sexual Behaviour - Nathalie Fontenay: 0113 3952883

Whistleblowing:

NSPCC Whistle-blowing: 0808 800 5000

Public Concern at Work: 0207 404 6609

Ofsted: 0300 123 3155

whistleblowing@ofsted.gov.uk

Cruse Bereavement: 0113 234 4150

Rape Crisis: 0808 802 9999

Samaritans: 116 123

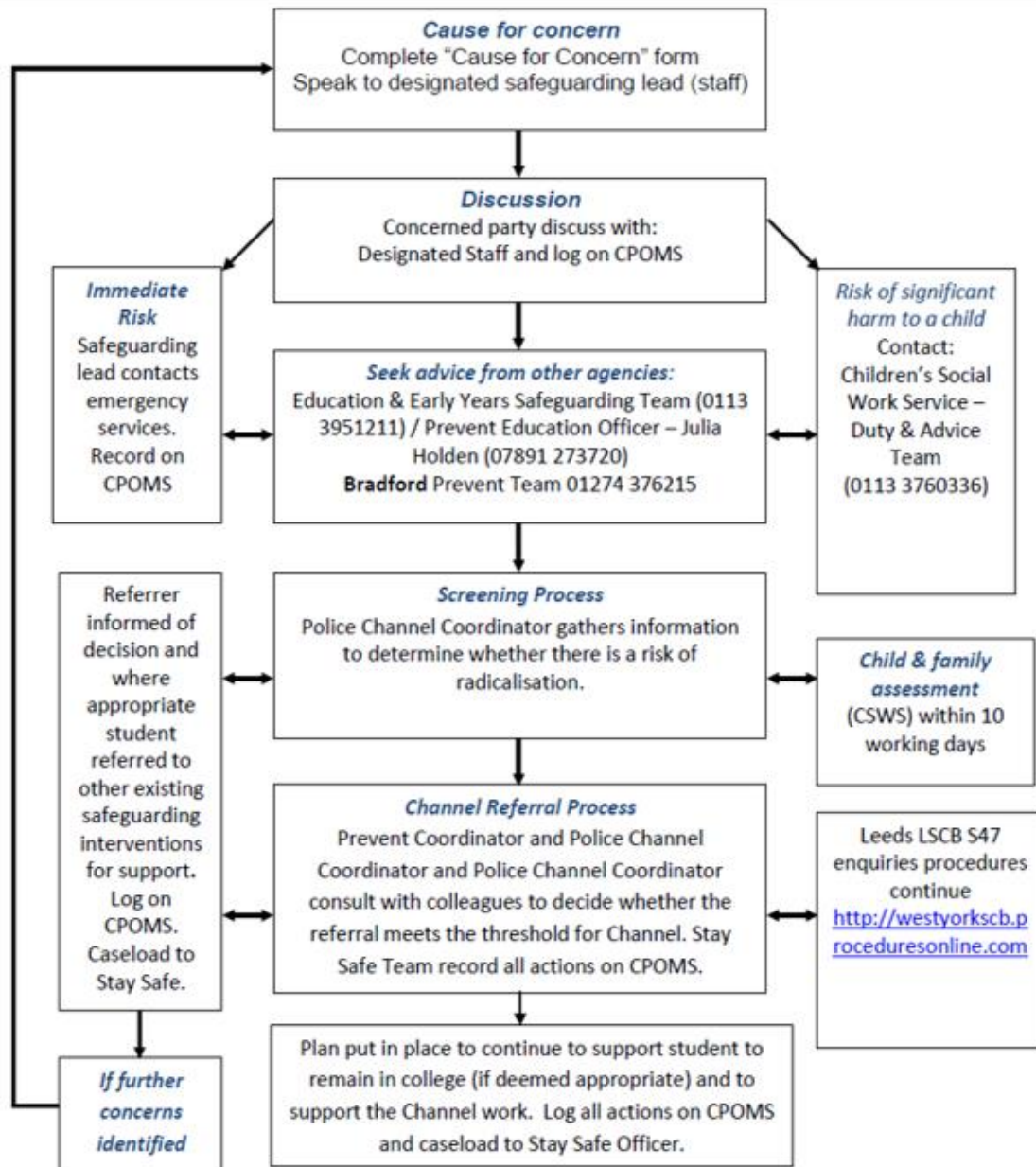
www.childline.org.uk

Mental Health Charities

Young Men www.thecalmzone.net

MIND: 0300 123 3393

Appendix A



Further information and relevant guidance documents referred to are available electronically

Staff are advised to notify the DSLs with any cause for concern in relation to the Prevent Duty.
The DSLs will liaise with the Principal throughout the process.

Contact details: Prevent Education Officer – Julia Holden (07891 273720)