



Child Protection and Safeguarding Policy

(including Adult Safeguarding, safer recruitment, allegations against staff and low-level concerns)

August 2024

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Important SupaJam contacts

Role & Location	Name	Contact Details
Director of Safeguarding	Hannah Goslett	hannah.goslett@supajam-education.org
Swanley DSL	Hannah Goslett	hannah.goslett@supajam-education.org
Canterbury DSL	Rachel Maigrot	rachel.maigrot@supajam-education.org
Brighton DSL	Charlotte O'Brien	Charlotte.obrien@supajam-education.org

Safeguarding Statement

SupaJam is a post-16 specialist provider, specialising in Music, Maths, English and Life Skills. All staff, volunteers and partners are committed to safeguarding the welfare of every person within SupaJam. Our mission is to help young people to engage and achieve within a safe and inclusive environment. 1. Aims

SupaJam aims to ensure that:

- Appropriate action is taken in a timely manner to safeguard and promote children's welfare
- All staff are aware of their statutory responsibilities with respect to safeguarding
- Staff are properly trained in recognising and reporting safeguarding issues

2. Legislation and statutory guidance

This policy is based on the Department for Education's (DfE's) statutory guidance [Keeping Children Safe in Education \(2024\)](#) and [Working Together to Safeguard Children \(2023\)](#), the [Maintained Schools Governance Guide](#) and [Academy Trust Governance Guide](#). We comply with this guidance and the arrangements agreed and published by our 3 local safeguarding partners (see section 3).

This policy is also based on the following legislation:

Part 1 of the schedule to the [Non-Maintained Special Schools \(England\) Regulations 2015](#), which places a duty on non-maintained special schools to safeguard and promote the welfare of pupils at the school

[The Children Act 1989](#) (and [2004 amendment](#)), which provides a framework for the care and protection of children.

Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the [Serious Crime Act 2015](#), which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18.

[Statutory guidance on FGM](#), which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM

[The Rehabilitation of Offenders Act 1974](#), which outlines when people with criminal convictions can work with children

Schedule 4 of the [Safeguarding Vulnerable Groups Act 2006](#), which defines what 'regulated activity' is in relation to children

[Statutory guidance on the Prevent duty](#), which explains schools' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism

[The Human Rights Act 1998](#), which explains that being subjected to harassment, violence and/or abuse, including that of a sexual nature, may breach any or all of the rights which apply to individuals under the [European Convention on Human Rights](#) (ECHR)

[The Equality Act 2010](#), which makes it unlawful to discriminate against people regarding particular protected characteristics (including disability, sex, sexual orientation, gender reassignment and race). This means our governors and headteacher should carefully consider how they are supporting their pupils with regard to these characteristics. The Act allows our school to take positive action to deal with particular disadvantages affecting pupils (where we can show it's proportionate). This includes making reasonable adjustments for disabled pupils. For example, it could include taking positive action to support girls where there's evidence that they're being disproportionately subjected to sexual violence or harassment

[The Public Sector Equality Duty \(PSED\)](#), which explains that we must have due regard to eliminating unlawful discrimination, harassment and victimisation. The PSED helps us to focus on key issues of concern and how to improve pupil outcomes. Some pupils may be more at risk of harm from issues such as sexual violence; homophobic, biphobic or transphobic bullying; or racial discrimination

3. Definitions

Safeguarding and promoting the welfare of children means:

- Providing help and support to meet the needs of children as soon as problems emerge
- Protecting children from maltreatment whether that is within or outside the home, including online
- Preventing impairment of children's mental and physical health or development

- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- Taking action to enable all children to have the best outcomes

Child protection is part of this definition and refers to activities undertaken to protect specific children who are suspected to be suffering, or likely to suffer, significant harm. This includes harm that occurs inside or outside the home, including online.

Abuse is a form of maltreatment of a child, and may involve inflicting harm or failing to act to prevent harm. Appendix 1 explains the different types of abuse.

Neglect is a form of abuse and is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Appendix 1 defines neglect in more detail.

Sharing of nudes and semi-nudes (also known as sexting or youth-produced sexual imagery) is where children share nude or semi-nude images, videos or live streams. This also includes pseudo-images that are computer-generated images that otherwise appear to be a photograph or video.

Children includes everyone under the age of 18.

The following 3 **safeguarding partners** are identified in Keeping Children Safe in Education (and defined in the Children Act 2004, as amended by chapter 2 of the Children and Social Work Act 2017). They will make arrangements to work together to safeguard and promote the welfare of local children, including identifying and responding to their needs:

The local authority (LA)

- Integrated care boards (previously known as clinical commissioning groups) for an area within the LA
- The chief officer of police for a police area in the LA area

Victim is a widely understood and recognised term, but we understand that not everyone who has been subjected to abuse considers themselves a victim, or would want to be described that way. When managing an incident, we will be prepared to use any term that the child involved feels most comfortable with.

Alleged perpetrator(s) and **perpetrator(s)** are widely used and recognised terms. However, we will think carefully about what terminology we use (especially in front of children) as, in some cases, abusive behaviour can be harmful to the perpetrator too. We will decide what's appropriate and which terms to use on a case-by-case basis.

4. Equality statement

Some children have an increased risk of abuse, both online and offline, and additional barriers can exist for some children with respect to recognising or disclosing it. We are

committed to anti-discriminatory practice and recognise children's diverse circumstances. We ensure that all children have the same protection, regardless of any barriers they may face.

We give special consideration to children who:

- Have special educational needs and/or disabilities (SEND) or health conditions (see section 10)
- Are young carers
- May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
- Have English as an additional language (EAL)
- Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence
- Are at risk of female genital mutilation (FGM), sexual exploitation, forced marriage, or radicalisation
- Are asylum seekers
- Are at risk due to either their own or a family member's mental health needs
- Are looked after or previously looked after (see section 12)
- Are missing or absent from education for prolonged periods and/or repeat occasions
- Whose parent/carer has expressed an intention to remove them from college to be home educated

5. Roles and responsibilities

Safeguarding and child protection is **everyone's** responsibility. This policy applies to all staff and volunteers and in the college and is consistent with the procedures of the 3 safeguarding partners. Our policy and procedures also apply to extended college and off-site activities.

The college plays a crucial role in preventative education. This is in the context of a whole-school approach to preparing pupils for life in modern Britain, and a culture of zero tolerance of sexism, misogyny/misandry, homophobia, biphobia, transphobia and sexual violence/harassment. This will be underpinned by our:

- Policy for Promoting Positive Behaviour
- Pastoral support system using allocated key workers as primary wellbeing support for all students

- Planned programme of relationships, sex and health education (PSHE), which is inclusive and delivered regularly, tackling issues such as:
- Healthy and respectful relationships
- Boundaries and consent
- Stereotyping, prejudice and equality
- Body confidence and self-esteem
- How to recognise an abusive relationship (including coercive and controlling behaviour)
- The concepts of, and laws relating to, sexual consent, sexual exploitation, abuse, grooming, coercion, harassment, rape, domestic abuse, so-called honour-based violence such as forced marriage and FGM and how to access support
- What constitutes sexual harassment and sexual violence and why they're always unacceptable

5.1 All staff

Staff who work directly with children are expected to read part 1, part 5 and Annex B (about specific safeguarding issues) of Keeping Children Safe in Education 2024 (KCSIE).

All staff who **don't** work directly with children read part 1 of KCSIE or annex A of KCSIE (a condensed version of part 1).

All staff will:

- Read and understand part 1 and annex B of the Department for Education's statutory safeguarding guidance, [Keeping Children Safe in Education](#), and review this guidance at least annually.
- Confirm via SupaJam's CPOMS system that they have read and understood part one of KCSIE
- Reinforce the importance of online safety when communicating with parents and carers. This includes making parents and carers aware of what we ask children to do online (e.g. sites they need to visit or who they'll be interacting with online)
- Provide a safe space for students who are LGBTQ+ to speak out and share their concerns

All staff will be aware of and understand:

- SupaJam's systems that support safeguarding, including this child protection and safeguarding policy, the 'Staff Code of Conduct' policy, the role and identity of the designated safeguarding lead (DSL) and Deputy DSLs, the policy for promoting positive behaviour, online safety policy that includes the expectations, applicable roles and responsibilities in relation to filtering and monitoring, and SupaJam's attendance policy.

- The early help assessment process (sometimes known as the common assessment framework) and their role in it, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment
- The process for making referrals to local authority children's social care and for statutory assessments that may follow a referral, including the role they might be expected to play
- What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals
- The signs of different types of abuse, neglect and exploitation, including domestic and sexual abuse (including controlling and coercive behaviour, as well as parental conflict that is frequent, intense, and unresolved), as well as specific safeguarding issues, such as child-on-child abuse, grooming, child sexual exploitation (CSE), child criminal exploitation (CCE), indicators of being at risk from or involved with serious violent crime, FGM, radicalisation and serious violence (including that linked to county lines)
- New and emerging threats, including online harm, grooming, sexual exploitation, criminal exploitation, radicalisation, and the role of technology and social media in presenting harm
- The importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe
- The fact that children can be at risk of harm inside and outside of their home, at school and online
- The fact that children who are (or who are perceived to be) lesbian, gay, bisexual or gender questioning (LGBTQ+) can be targeted by other children
- That a child and their family may be experiencing multiple needs at the same time
- What to look for to identify children who need help or protection

Section 16 and appendix 4 of this policy outline in more detail how staff are supported to do this.

5.2 The Designated Safeguarding Lead (DSL)

The DSL is a member of the senior leadership team. Our Director of Safeguarding and DSL is Hannah Goslett. The Director of Safeguarding takes lead responsibility for child protection and wider safeguarding across the organisation. This includes online safety, and understanding our filtering and monitoring processes on college devices and networks to keep students safe online.

During term time, the Director of Safeguarding and the DSLs as stated at the top of the policy will be available during college hours for staff to discuss any safeguarding concerns.

When the DSL for each base is absent, the deputies (who are also the Base Leaders) – will act as cover.

If the Director of Safeguarding, DSLs and Deputies are not available, Richard Dwyer will act as cover.

The DSL will be given the time, funding, training, resources and support to:

- Provide advice and support to other staff on child welfare and child protection matters
- Take part in strategy discussions and inter-agency meetings and/or support other staff to do so
- Contribute to the assessment of children
- Refer suspected cases, as appropriate, to the relevant body (local authority children's social care, Channel programme, Disclosure and Barring Service, and/or police), and support staff who make such referrals directly
- Have a good understanding of harmful sexual behaviour
- Have a good understanding of the filtering and monitoring systems and processes in place at our school
- Make sure that staff have appropriate Prevent training and induction
- Act as a lead practitioner for the local authority

The DSL will also:

- Keep the Director of Safeguarding and the SLT informed of any issues, particularly including any barriers in carrying out any of their safeguarding duties.
- Liaise with local authority case managers and designated officers for child protection concerns as appropriate
- Discuss the local response to sexual violence and sexual harassment with police and local authority children's social care colleagues to prepare the school's policies
- Be confident that they know what local specialist support is available to support all children involved (including victims and alleged perpetrators) in sexual violence and sexual harassment, and be confident as to how to access this support
- Be aware that children must have an 'appropriate adult' to support and help them in the case of a police investigation or search

The full responsibilities of the DSL and Deputy DSL (Base Leaders) are set out in their job description.

5.3 The Director of Safeguarding

The Director of Safeguarding is responsible for the implementation of this policy, including:

Ensuring that staff (including temporary staff) and volunteers:

- Are informed of our systems that support safeguarding, including this policy, as part of their induction
- Understand and follow the procedures included in this policy, particularly those concerning referrals of cases of suspected abuse and neglect
- Communicating this policy to parents/carers when their child or young person joins the college and via the college website
- Ensuring that the DSLs has appropriate time, funding, training and resources, and that there is always adequate cover if the DSLs are absent
- Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate (see appendix 3)
- Making decisions regarding all low-level concerns, though they may wish to collaborate with the DSL on this
- Overseeing the safe use of technology, mobile phones and cameras in the setting

6. Confidentiality

SupaJam understands that the Data Protection Act 2018 isn't a barrier to sharing information and that it provides a framework which ensures that personal information about living individuals is shared appropriately.

SupaJam understands that it is important to be open and honest with the children, young person and their parents/carers where appropriate about why, what, how and with who we might or could share information with. SupaJam recognises that we may need to seek their agreement unless it's inappropriate or unsafe to do so.

SupaJam's designated safeguarding leads base information sharing decisions on considerations of the safety and wellbeing of the child or young person - as well as anyone else who may be affected by their actions, and ensure that the sharing of information is necessary for the purpose in which they share it. Information is shared with only those who need it and the DSL will ensure that the information is accurate, up-to-date and is shared in a timely manner and also shared securely.

All staff at SupaJam should never promise a child or young person that will not tell anyone about a report of abuse. If a victim asks SupaJam not to tell anyone, the DSL will have to balance the victim's wishes against their duty to protect the victim and other children who may be at risk. The DSL will consider that;

- The parents or carers should normally be informed (unless this puts the victim at further risk)
- The basic safeguarding principle is: if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to the Local Authority.
- Rape, assault by penetration and sexual assault are crimes. Where a report of rape, assault by penetration or sexual assault is made, this should be referred to the police. While the age of criminal responsibility is 10, if the alleged perpetrator is under 10, the starting principle of referring to the police remains.

Regarding anonymity, all staff will:

- Be aware of anonymity, witness support and the criminal process in general where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system
- Do all they reasonably can to protect the anonymity of any children involved in any report of sexual violence or sexual harassment – for example, carefully considering which staff should know about the report, and any support for children involved
- Consider the potential impact of social media in facilitating the spreading of rumours and exposing victims' identities

The government's [information sharing advice for safeguarding practitioners](#) includes the 7 'golden rules' for sharing information, and will support staff who are required to make decisions about sharing information.

If staff are in any doubt about sharing information, they should speak to the DSL (or deputy)

Confidentiality is also addressed in this policy with respect to record-keeping

7. Recognising abuse and taking action

All staff are expected to be able to identify and recognise all forms of abuse, neglect and exploitation and shall be alert to the potential need for early help for a child who:

- Is disabled
- Has special educational needs (whether or not they have a statutory education health and care (EHC) plan)
- Is a young carer
- Is bereaved

- Is showing signs of being drawn into anti-social or criminal behaviour, including being affected by gangs and county lines and organised crime groups and/or serious violence, including knife crime
- Is frequently missing/goes missing from education, care or home
- Is at risk of modern slavery, trafficking, sexual and/or criminal exploitation
- Is at risk of being radicalised or exploited
- Is viewing problematic and/or inappropriate online content (for example, linked to violence), or developing inappropriate relationships online
- Is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- Is misusing drugs or alcohol
- Is suffering from mental ill health
- Has returned home to their family from care
- Is at risk of so-called 'honour'-based abuse such as female genital mutilation (FGM) or forced marriage
- Is a privately fostered child
- Has a parent or carer in custody or is affected by parental offending
- Is missing education, or persistently absent from school, or not in receipt of full-time education
- Has experienced multiple suspensions and is at risk of, or has been permanently excluded

Staff and volunteers must follow the procedures set out below in the event of a safeguarding issue.

Please note – in this and subsequent sections, you should take any references to the DSL to mean “the DSLs in each SupaJam college (or deputy DSL)”.

7.1 If a child is suffering or likely to suffer harm, or in immediate danger

Make a referral to local authority children's social care and/or the police **immediately** if you believe a child is suffering or likely to suffer from harm, or is in immediate danger.

Anyone can make a referral.

Tell the DSL (see section 5.2) as soon as possible if you make a referral directly.

[Please see Local Safeguarding Procedures at the end of this policy](#)

7.2 If a child makes a disclosure to you

If a child or young person discloses a safeguarding issue to you, you should:

- Listen to and believe them. Allow them time to talk freely and do not ask leading questions
- Stay calm and do not show that you are shocked or upset

- Tell the child they have done the right thing in telling you. Do not tell them they should have told you sooner
- Explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret
- Write up your conversation as soon as possible in the child's own words. Stick to the facts, and do not put your own judgement on it
- Sign and date the write-up and pass it on to the DSL. Alternatively, if appropriate, make a referral to local authority children's social care and/or the police directly (see 7.1), and tell the DSL as soon as possible that you have done so. Aside from these people, do not disclose the information to anyone else unless told to do so by a relevant authority involved in the safeguarding process

Bear in mind that some children may:

- Not feel ready, or know how to tell someone that they are being abused, exploited or neglected
- Not recognise their experiences as harmful
- Feel embarrassed, humiliated or threatened. This could be due to their vulnerability, disability, sexual orientation and/or language barriers

None of this should stop you from having a 'professional curiosity' and speaking to the DSL if you have concerns about a child.

7.3 If you discover that FGM has taken place or a student is at risk of FGM

Keeping Children Safe in Education explains that FGM comprises "all procedures involving partial or total removal of the external female genitalia, or other injury to the female genital organs".

FGM is illegal in the UK and a form of child abuse with long-lasting, harmful consequences. It is also known as 'female genital cutting', 'circumcision' or 'initiation'.

Possible indicators that a student has already been subjected to FGM, and factors that suggest a student may be at risk, are set out in appendix 4 of this policy.

Any teacher or leader who either:

- Is informed by a girl under 18 that an act of FGM has been carried out on her; or
- Observes physical signs which appear to show that an act of FGM has been carried out on a girl under 18 and they have no reason to believe that the act was necessary for the girl's physical or mental health or for purposes connected with labour or birth

Must immediately report this to the police, personally. This is a mandatory statutory duty, and staff will face disciplinary sanctions for failing to meet it.

Unless they have been specifically told not to disclose, they should also discuss the case with the DSL and involve local authority children's social care as appropriate.

Any other member of staff who discovers that an act of FGM appears to have been carried out on a **student under 18** must speak to the DSL and follow our local safeguarding procedures.

The duty for teachers and leaders mentioned above does not apply in cases where a student is *at risk* of FGM or FGM is suspected but is not known to have been carried out. Staff should not examine students.

Any member of staff who suspects a student is *at risk* of FGM or suspects that FGM has been carried out: or discovers that a student **aged 18 or over** appears to have been a victim of FGM] should speak to the DSL and follow our local safeguarding procedures.

[Please see Local Safeguarding Procedures at the end of this policy](#)

7.4 If you have concerns about a child (as opposed to believing a child is suffering or likely to suffer from harm, or is in immediate danger)

Figure 1 below, before section 7.7, illustrates the procedure to follow if you have any concerns about a child's welfare.

Where possible, speak to the DSL first to agree a course of action.

If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to the Base Leader, a member of the leadership team or senior leadership team and/or take advice from local authority children's social care. You can also seek advice at any time from the NSPCC helpline on 0808 800 5000. Share details of any actions you take with the DSL and record on CPOMS as soon as practically possible.

Make a referral to local authority children's social care directly, if appropriate (see 'Referral' below). Share any action taken with the DSL and record on CPOMS as soon as possible.

Early help assessment

If an early help assessment is appropriate, the DSL will generally lead on liaising with other agencies and setting up an inter-agency assessment as appropriate. Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead practitioner.

We will discuss and agree, with statutory safeguarding partners, levels for the different types of assessment, as part of local arrangements.

The DSL will keep the case under constant review and SupaJam will consider a referral to local authority children's social care if the situation does not seem to be improving. Timelines of interventions will be monitored and reviewed.

[Please see Local Safeguarding Procedures at the end of this policy](#)

Referral

If it is appropriate to refer the case to local authority children's social care or the police, the DSL will make the referral or support you to do so.

If you make a referral directly due to identifying a child as at immediate risk of harm (see section 7.1), you must tell the DSL as soon as possible.

The local authority will make a decision within 1 working day of a referral about what course of action to take and will let the person who made the referral know the outcome.

The DSL or person who made the referral must follow up with the local authority if this information is not made available, and ensure outcomes are properly recorded on CPOMS.

If the child's situation does not seem to be improving after the referral, the DSL or person who made the referral must follow local escalation procedures to ensure their concerns have been addressed and that the child's situation improves.

[Please see Local Safeguarding Procedures at the end of this policy](#)

7.5 If you have concerns about extremism

If a child is not suffering or likely to suffer from harm, or in immediate danger, where possible speak to the DSL first to agree a course of action.

If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the leadership or senior leadership team and/or seek advice from local authority children's social care. Make a referral to local authority children's social care directly, if appropriate (see 'Referral' above). Inform the DSL or deputy as soon as practically possible after the referral.

Where there is a concern, the DSL will consider the level of risk and decide which agency to make a referral to. This could include the police or [Channel](#), the government's programme for identifying and supporting individuals at risk of becoming involved with or supporting terrorism, or the local authority children's social care team.

The DfE also has a dedicated telephone helpline, 020 7340 7264, which school staff and governors can call to raise concerns about extremism with respect to a student. You can also email counter.extremism@education.gov.uk. Note that this is not for use in emergency situations.

In an emergency, call 999 or the confidential anti-terrorist hotline on 0800 789 321 if you:

- Think someone is in immediate danger

- Think someone may be planning to travel to join an extremist group

- See or hear something that may be terrorist-related

7.6 If you have a concern about mental health

Mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

Staff will be alert to behavioural signs that suggest a child may be experiencing a mental health problem or be at risk of developing one.

If you have a mental health concern about a child that is also a safeguarding concern, take immediate action by following the steps in section 7.4.

If you have a mental health concern that is **not** also a safeguarding concern, speak to the DSL to agree a course of action.

Figure 1: procedure if you have concerns about a child's welfare (as opposed to believing a child is suffering or likely to suffer from harm, or in immediate danger)

(Note – if the DSL is unavailable, this should not delay action. See section 7.4 for what to do.)

7.7 Concerns about a staff member, supply teacher, volunteer or contractor

If you have concerns about a member of staff (including a supply teacher, volunteer or contractor), or an allegation is made about a member of staff (including a supply teacher, volunteer or contractor) posing a risk of harm to children, speak to the College Leader or Director of safeguarding as soon as possible. If the concerns/allegations are about the College Leader or Director of Safeguarding, speak to any other member of the SLT or the CEOs. If you have concerns about the SLT or CEOs you can report to the LADO directly.

The Director of Safeguarding will then follow the procedures set out in appendix 3, if appropriate.

If you have concerns about a member of staff (including a supply teacher, volunteer or contractor), or an allegation is made about a member of staff (including a supply teacher, volunteer or contractor) posing a risk of harm to children, speak to the College Leader or Director of Safeguarding as soon as possible. If the concerns/allegations are about the College Leader or Director of Safeguarding, speak to the proprietor.

The Director of Safeguarding or another member of the SLT will then follow the procedures set out in appendix 3, if appropriate.

If the concerns/allegations are about the Director of Safeguarding or another member of the SLT, speak to the CEOs.

If the concerns/allegations are about the Director of Safeguarding or another member of the CEOs, speak to the local authority designated officer (LADO).

Where you believe there is a conflict of interest in reporting a concern or allegation about a member of staff (including a supply teacher, volunteer or contractor) to the headteacher, report it directly to the local authority designated officer (LADO).

If you receive an allegation relating to an incident where an individual or organisation was using the school premises for running an activity for children, follow our school safeguarding policies and procedures, informing the LADO, as you would with any safeguarding allegation.

7.8 Allegations of abuse made against other students

We recognise that children are capable of abusing their peers. Abuse will never be tolerated or passed off as “banter”, “just having a laugh” or “part of growing up”, as this can lead to a culture of unacceptable behaviours and an unsafe environment for students.

We also recognise the gendered nature of child-on-child abuse. However, all child-on-child abuse is unacceptable and will be taken seriously.

Most cases of students hurting other students will be dealt with under SupaJam's policy for promoting positive behaviour, but this child protection and safeguarding policy will apply to

any allegations that raise safeguarding concerns. This might include where the alleged behaviour:

- Is serious, and potentially a criminal offence
- Could put pupils in the school at risk
- Is violent
- Involves pupils being forced to use drugs or alcohol
- Involves sexual exploitation, sexual abuse or sexual harassment, such as indecent exposure, sexual assault, upskirting or sexually inappropriate pictures or videos (including the sharing of nudes and semi-nudes)

See appendix 4 for more information about child-on-child abuse.

Procedures for dealing with allegations of child-on-child abuse

If a student makes an allegation of abuse against another student:

- You must record the allegation and tell the DSL, but do not investigate it
- The DSL will contact the local authority children's social care team and follow its advice, as well as the police if the allegation involves a potential criminal offence
- The DSL will put a risk assessment and support plan into place for all children involved (including the victim(s), the child(ren) against whom the allegation has been made and any others affected) with a named person they can talk to if needed. This will include considering school transport as a potentially vulnerable place for a victim or alleged perpetrator(s)
- The DSL will contact the children and adolescent mental health services (CAMHS), if appropriate

If the incident is a criminal offence and there are delays in the criminal process, the DSL will work closely with the police (and other agencies as required) while protecting children and/or taking any disciplinary measures against the alleged perpetrator. We will ask the police if we have any questions about the investigation.

[Please see Local Safeguarding Procedures at the end of this policy](#)

Creating a supportive environment in SupaJam and minimising the risk of child-on-child abuse

We recognise the importance of taking proactive action to minimise the risk of child-on-child abuse, and of creating a supportive environment where victims feel confident in reporting incidents.

To achieve this, SupaJam will:

- Challenge any form of derogatory or sexualised language or inappropriate behaviour between peers, including requesting or sending sexual images
- Be vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing type violence with respect to boys
- Ensure our curriculum helps to educate pupils about appropriate behaviour and consent
- Ensure pupils are able to easily and confidently report abuse using our reporting systems (as described in section 7.10 below)
- Ensure staff reassure victims that they are being taken seriously
- Be alert to reports of sexual violence and/or harassment that may point to environmental or systemic problems that could be addressed by updating policies, processes and the curriculum, or could reflect wider issues in the local area that should be shared with safeguarding partners
- Support children who have witnessed sexual violence, especially rape or assault by penetration. We will do all we can to make sure the victim, alleged perpetrator(s) and any witnesses are not bullied or harassed
- Consider intra-familial harms and any necessary support for siblings following a report of sexual violence and/or harassment
- Ensure staff are trained to understand:
 - How to recognise the indicators and signs of child-on-child abuse, and know how to identify it and respond to reports
 - That even if there are no reports of child-on-child abuse in school, it does not mean it is not happening – staff should maintain an attitude of “it could happen here”
 - That if they have any concerns about a child’s welfare, they should act on them immediately rather than wait to be told, and that victims may not always make a direct report. For example:
 - Children can show signs or act in ways they hope adults will notice and react to
 - A friend may make a report
 - A member of staff may overhear a conversation
 - A child’s behaviour might indicate that something is wrong
 - That certain children may face additional barriers to telling someone because of their vulnerability, disability, gender, ethnicity and/or sexual orientation

- That a pupil harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy
- The important role they have to play in preventing child-on-child abuse and responding where they believe a child may be at risk from it
- That they should speak to the DSL if they have any concerns
- That social media is likely to play a role in the fall-out from any incident or alleged incident, including for potential contact between the victim, alleged perpetrator(s) and friends from either side

The DSL will take the lead role in any disciplining of the alleged perpetrator(s). We will provide support at the same time as taking any disciplinary action.

Disciplinary action can be taken while other investigations are going on, e.g. by the police. The fact that another body is investigating or has investigated an incident doesn't (in itself) prevent our school from coming to its own conclusion about what happened and imposing a penalty accordingly. We will consider these matters on a case-by-case basis, taking into account whether:

1. Taking action would prejudice an investigation and/or subsequent prosecution – we will liaise with the police and/or local authority children's social care to determine this.
2. There are circumstances that make it unreasonable or irrational for us to reach our own view about what happened while an independent investigation is ongoing

7.9 Sharing of nudes and semi-nudes ('sexting')

All staff responsibilities when responding to an incident

If you are made aware of an incident involving the consensual or non-consensual sharing of nude or semi-nude images/videos, including pseudo-images, which are computer-generated images that otherwise appear to be a photograph or video (also known as 'sexting' or 'youth produced sexual imagery'), you must report it to the DSL immediately.

You must **not**:

- View, copy, print, share, store or save the imagery yourself, or ask a pupil to share or download it (if you have already viewed the imagery by accident, you must report this to the DSL)
- Delete the imagery or ask the pupil to delete it
- Ask the pupil(s) who are involved in the incident to disclose information regarding the imagery (this is the DSL's responsibility)
- Share information about the incident with other members of staff, the pupil(s) it involves or their, or other, parents and/or carers

- Say or do anything to blame or shame any young people involved

You should explain that you need to report the incident, and reassure the pupil(s) that they will receive support and help from the DSL.

Initial review meeting

Following a report of an incident, the DSL will hold an initial review meeting with appropriate college staff – this may include the staff member who reported the incident and the safeguarding or the Director of Safeguarding. This meeting will consider the initial evidence and aim to determine:

- Whether there is an immediate risk to student(s)
- If a referral needs to be made to the police and/or children's social care
- If it is necessary to view the image(s) in order to safeguard the young person (in most cases, images or videos should not be viewed)
- What further information is required to decide on the best response
- Whether the image(s) has been shared widely and via what services and/or platforms (this may be unknown)
- Whether immediate action should be taken to delete or remove images or videos from devices or online services
- Any relevant facts about the students involved which would influence risk assessment
- If there is a need to contact another school, college, setting or individual
- Whether to contact parents or carers of the student/s involved (in most cases parents/ carers should be involved)

The DSL will make an immediate referral to police and/or children's social care if:

- The incident involves an adult. Where an adult poses as a child to groom or exploit a child or young person, the incident may first present as a child-on-child incident. See appendix 4 for more information on assessing adult-involved incidents
- There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example, owing to SEN)
- What the DSL knows about the images or videos suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent
- The imagery involves sexual acts and any students in the images or videos is under 13

- The DSL has reason to believe a student is at immediate risk of harm owing to the sharing of nudes and semi-nudes (for example, the young person is presenting as suicidal or self-harming)

If none of the above apply then the DSL, in consultation with the College Leader and other members of staff as appropriate, may decide to respond to the incident without involving the police or children's social care. The decision will be made and recorded in line with the procedures set out in this policy.

Further review by the DSL

If at the initial review stage a decision has been made not to refer to police and/or children's social care, the DSL will conduct a further review to establish the facts and assess the risks.

They will hold interviews with the students involved (if appropriate), along with an appropriate adult for the students being interviewed.

If at any point in the process there is a concern that a student has been harmed or is at risk of harm, a referral will be made to children's social care and/or the police immediately.

Informing parents/carers

The DSL will inform parents/carers at an early stage and keep them involved in the process, unless there is a good reason to believe that involving them would put the student at risk of harm.

Referring to the police

If it is necessary to refer an incident to the police, this will be done through Kent Police Non-emergency.

Recording incidents

All incidents of sharing of nudes and semi-nudes, and the decisions made in responding to them, will be recorded. The record-keeping arrangements set out in section 14 of this policy also apply to recording these incidents.

Curriculum coverage

Students are taught about the issues surrounding the sharing of nudes and semi-nudes as part of our SMSC and Preparation For Adulthood programmes. Teaching covers the following in relation to the sharing of nudes and semi-nudes:

- What it is
- How it is most likely to be encountered
- The consequences of requesting, forwarding or providing such images, including when it is and is not abusive and when it may be deemed as online sexual harassment
- Issues of legality

- The risk of damage to people's feelings and reputatio
- Students also learn the strategies and skills needed to manage:
 1. Specific requests or pressure to provide (or forward) such images
 2. The receipt of such images

This policy on the sharing of nudes and semi-nudes is also shared with students so they are aware of the processes the school will follow in the event of an incident.

Teaching follows best practice in delivering safe and effective education, including:

- Putting safeguarding first
- Approaching from the perspective of the child
- Promoting dialogue and understanding
- Empowering and enabling children and young people
- Never frightening or scare-mongering
- Challenging victim-blaming attitudes

7.10 Reporting systems for our students

Where there is a safeguarding concern, we will take the child's wishes and feelings into account when determining what action to take and what services to provide.

We recognise the importance of ensuring students feel safe and comfortable to come forward and report any concerns and/or allegations.

To achieve this, we will:

Put systems in place for pupils to confidently report abuse

Ensure our reporting systems are well promoted, easily understood and easily accessible for students. Make it clear to pupils that their concerns will be taken seriously, and that they can safely express their views and give feedback

Reporting Systems and Education for Students:

- Staff receive extensive safeguarding training to ensure they are equipped manage safeguarding disclosures and escalating where required. Staff also spend time to ensure they promote a positive safeguarding culture where students feel safe to make direct disclosures to staff. The DSLs photo's are on a poster stating who they are and their role as a DSL.
- SupaJam's Safeguarding Team email address is placed around all SupaJam bases including classrooms, toilets common room areas, studios etc. The email inbox is

monitored by SupaJam DSLs and College Leaders. The emails address is safe@supajam-education.org

- SupaJam's Anonymous Safeguarding QR code is place around all SupaJam bases including classrooms, toilets, common room areas, studios etc. The QR code links to a Google Form that does not disclose the email address of the sender.
- A poster containing the QR code and a picture and names of the DSLs (base specific) are visible around all SupaJam bases to ensure that students are aware of who the safeguarding leads are.
- All students have a Key Worker LSP allocated to them in order to support them with low level pastoral and wellbeing.
- SupaJam students have a safeguarding workshop delivered to them by the DSLs at the start of the academic year outlining what safeguarding means, the importance of providing a safe environment at SupaJam, SupaJam's process for reporting and the role of the designated safeguarding lead.
- All SupaJam students take part in safeguarding workshops across the academic year to enhance the SMSC and Preparation for Adulthood Curriculum, such as sexual health and relationships, Drugs, Alcohol and Preventative Harm, online safety etc.

8. Online safety and the use of mobile technology

We recognise the importance of safeguarding children from potentially harmful and inappropriate online material, and we understand that technology is a significant component in many safeguarding and wellbeing issues.

To address this, SupaJam aims to:

- Have robust processes (including filtering and monitoring systems) in place to ensure the online safety of students, staff and volunteers
- Protect and educate the whole college community in its safe and responsible use of technology, including mobile and smart technology (which we refer to as 'mobile phones')
- Set clear guidelines for the use of mobile phones for the whole college community
- Establish clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate

The 4 key categories of risk

Our approach to online safety is based on addressing the following categories of risk:

Content – being exposed to illegal, inappropriate or harmful content, such as pornography, fake news, racism, misogyny, self-harm, suicide, antisemitism, radicalisation and extremism

Contact – being subjected to harmful online interaction with other users, such as 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, such as 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

To meet our aims and address the risks above, we will:

- Educate students about online safety as part of our curriculum. For example:
- The safe use of social media, the internet and technology
- Keeping personal information private
- How to recognise unacceptable behaviour online
- How to report any incidents of cyber-bullying, ensuring students are encouraged to do so, including where they're a witness rather than a victim
- Train staff, as part of their induction, on safe internet use and online safeguarding issues including cyber-bullying, the risks of online radicalisation, and the expectations, roles and responsibilities around filtering and monitoring. All staff members will receive refresher training as required and at least once each academic year
- Educate parents/carers about online safety via our website, communications sent directly to them and during parents' evenings. We will also share clear procedures with them so they know how to raise concerns about online safety
- Make sure staff are aware of any restrictions placed on them with regards to the use of their mobile phone and cameras, for example that:
 1. Staff are allowed to bring their personal phones to work for their own use, but will limit such use to non-contact time when students are not present
 2. Staff will not take pictures or recordings of students on their personal phones or cameras.
- Make all students, parents/carers, staff, volunteers and visitors aware that they are expected to sign an agreement regarding the acceptable use of the internet in SupaJam, use of the college ICT systems and use of their mobile and smart technology
- Explain the sanctions we will use if a student is in breach of our policies on the acceptable use of the internet and mobile phones

- Make sure all staff, students and parents/carers are aware that if there is reason to do so and with the approval of SLT, SupaJam has the power to search student's phones, as set out in the [DfE's guidance on searching, screening and confiscation](#)
- Put in place robust filtering and monitoring systems to limit children's exposure to the 4 key categories of risk (described above) from the college's IT systems
- Carry out an annual review of our approach to online safety, supported by an annual risk assessment that considers and reflects the risks faced by our college community
- Provide regular safeguarding and children protection updates including online safety to all staff, at least annually, in order to continue to provide them with the relevant skills and knowledge to safeguard effectively
- Review the child protection and safeguarding policy, including online safety, annually and ensure the procedures and implementation are updated and reviewed regularly

This section summarises our approach to online safety and mobile phone use. For full details about SupaJam policies in these areas, please refer to our online safety policy and mobile phone policies which can be found on our website www.semmuk.com

8.1 Artificial intelligence (AI)

Generative artificial intelligence (AI) tools are now widespread and easy to access. Staff, pupils and parents/carers may be familiar with generative chatbots such as ChatGPT and Google Bard.

SupaJam recognises that AI has many uses, including enhancing teaching and learning, and in helping to protect and safeguard students. However, AI may also have the potential to facilitate abuse (e.g. bullying and grooming) and/or expose pupils to harmful content. For example, in the form of 'deepfakes', where AI is used to create images, audio or video hoaxes that look real.

SupaJam will treat any use of AI to access harmful content or bully students in line with this policy and SupaJam's Anti Bullying Policy.

Staff should be aware of the risks of using AI tools whilst they are still being developed and should carry out risk assessments for any new AI tool being used by the college.

9. Notifying parents or carers

Where appropriate, we will discuss any concerns about a child with the child's parents or carers. The DSL will normally do this in the event of a suspicion or disclosure.

Other staff will only talk to parents or carers about any such concerns following consultation with the DSL.

If we believe that notifying the parents or carers would increase the risk to the child, we will discuss this with the local authority children's social care team before doing so.

In the case of allegations of abuse made against other children, we will normally notify the parents or carers of all the children involved. We will think carefully about what information

we provide about the other child involved, and when. We will work with the police and/or local authority children's social care to make sure our approach to information sharing is consistent.

The DSL will, along with any relevant agencies (this will be decided on a case-by-case basis):

- Meet with the victim's parents or carers, with the victim, to discuss what's being put in place to safeguard them, and understand their wishes in terms of what support they may need and how the report will be progressed
- Meet with the alleged perpetrator's parents or carers to discuss support for them, and what's being put in place that will impact them, e.g. moving them out of classes with the victim, and the reason(s) behind any decision(s)

10. Students with special educational needs, disabilities or health conditions

We recognise that students with SEND or certain health conditions can face additional safeguarding challenges. Children with disabilities are more likely to be abused than their peers. Additional barriers can exist when recognising abuse, exploitation and neglect in this group, including:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration
- Students being more prone to peer group isolation or bullying (including prejudice-based bullying) than other pupils
- The potential for pupils with SEN, disabilities or certain health conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs
- Communication barriers and difficulties in managing or reporting these challenges
- Cognitive understanding – being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in schools or colleges or the consequences of doing so

We offer pastoral support for these pupils where all students have a key worker who supports them in developing their independence, to help them overcome communication barriers or the impact of SEMH to their learning and progression.

Any abuse involving pupils with SEND will require close liaison with the DSL (or College Leader).

11. Students with a social worker

Students may need a social worker due to safeguarding or welfare needs. We recognise that a child's experiences of adversity and trauma can leave them vulnerable to further harm as well as potentially creating barriers to attendance, learning, behaviour and mental health.

The DSL and all members of staff will work with and support social workers to help protect vulnerable children.

Where we are aware that a pupil has a social worker, the DSL will always consider this fact to ensure any decisions are made in the best interests of the pupil's safety, welfare and educational outcomes. For example, it will inform decisions about:

- Responding to unauthorised absence or missing education where there are known safeguarding risks
- The provision of pastoral and/or academic support

12. Looked-after and previously looked-after children

We will ensure that staff have the skills, knowledge and understanding to keep looked-after children and previously looked-after children safe. In particular, we will ensure that:

Appropriate staff have relevant information about children's looked after legal status, contact arrangements with birth parents or those with parental responsibility, and care arrangements.

We will ensure that staff have the skills, knowledge and understanding to keep looked-after children and previously looked-after children safe. In particular, we will ensure that:

- Appropriate staff have relevant information about children's looked after legal status, contact arrangements with birth parents or those with parental responsibility, and care arrangement
- The DSL has details of children's social workers and relevant virtual school heads
- All DSLs will ensure that any safeguarding concerns regarding looked-after and previously looked-after children are quickly and effectively responded to
- The DSL will work with virtual school heads to promote the educational achievement of looked-after and previously looked-after children

13. Pupils who are lesbian, gay, bisexual or gender questioning

The section of KCSIE 2024 on gender questioning children remains under review, pending the outcome of the gender questioning children guidance consultation, and final gender questioning guidance documents being published.

We recognise that students who are (or who are perceived to be) lesbian, gay, bisexual or gender questioning (LGBTQ+) can be targeted by other children.

We also recognise that LGBTQ+ children are more likely to experience poor mental health. Any concerns should be reported to the DSL.

When families/carers are making decisions about support for gender questioning pupils, they should be encouraged to seek clinical help and advice. This should be done as early as possible when supporting pre-pubertal children.

When supporting a gender questioning student, we will take a cautious approach as there are still unknowns around the impact of social transition, and a student may have wider vulnerability, such as complex mental health and psychosocial needs, and in some cases, autism spectrum disorder (ASD) and/or attention deficit hyperactivity disorder (ADHD).

We will also consider the broad range of their individual needs, in partnership with their parents/carers (other than in rare circumstances where involving parents/carers would constitute a significant risk of harm to the student). We will also include any clinical advice that is available and consider how to address wider vulnerabilities such as the risk of bullying.

Risks can be compounded where children lack trusted adults with whom they can be open. We therefore aim to reduce the additional barriers faced and create a culture where students can speak out or share their concerns with members of staff.

14. Complaints and concerns about school safeguarding policies

Complaints against staff that are likely to require a child protection investigation will be handled in accordance with our procedures for dealing with allegations of abuse made against staff (see appendix 3).

14.3 Whistle-blowing

Whistleblowing is the term used when a worker passes on information concerning wrongdoing. In this guidance, we call that “making a disclosure” or “blowing the whistle”. The wrongdoing will typically (although not necessarily) be something they have witnessed at work. To be covered by whistleblowing law, a worker who makes a disclosure must reasonably believe two things. The first is that they are acting in the public interest. This means in particular that personal grievances and complaints are not usually covered by whistleblowing law. The second thing that a worker must reasonably believe is that the disclosure tends to show past, present or likely future wrongdoing falling into one or more of the following categories:

- criminal offences (this may include, for example, types of financial impropriety such as fraud)
- failure to comply with an obligation set out in law
- miscarriages of justice
- endangering of someone’s health and safety
- damage to the environment

- covering up wrongdoing in the above categories

Whistleblowing law is located in the Employment Rights Act 1996 (as amended by the Public Interest Disclosure (PIDA) Act 1998). It provides the right for a worker to take a case to an employment tribunal if they have been victimised at work or they have lost their job because they have 'blown the whistle'.

SupaJam recognises that it is good practice to create an open, transparent and safe working environment where staff feel able to speak up. Although the law does not require SupaJam to have a whistleblowing policy in place, the existence of a whistleblowing policy shows that SupaJam is committed to listening to the concerns of staff.

By having clear policies and procedures for dealing with whistleblowing, an organisation demonstrates that it welcomes information being brought to the attention of management.

SupaJam is committed to the following:

- Recognising staff are valuable ears and eyes
- Ensuring that our culture is open and supportive
- Training and support to ensure that staff can easily approach a range of people in the organisation.
- Being able to respond - ensuring that SupaJam investigates promptly, asks further questions where required and delivers the outcome of the investigation
- Embracing the whistleblowing policy so that managers have better information to make decisions and control risk.
- Recognising that it is important that staff feel they can report concerns internally so that SupaJam can act promptly and put right whatever wrongdoing is found.

See SupaJam's full Whistleblowing Policy for further information around its process and procedure. You can access the policy via SupaJam's website www.semmuk.com

15. Record-keeping

We will hold records in line with our records retention schedule.

All safeguarding concerns, discussions, decisions made and the rationale for those decisions, must be recorded in writing. This should include instances where referrals were or were not made to another agency such as local authority children's social care or the Prevent programme, etc. If you are in any doubt about whether to record something, discuss it with the DSL.

Records will include:

- A clear and comprehensive summary of the concern, including the identification of risk
- Details of how the concern was followed up and resolved (risk management)
- A note of any action taken, decisions reached and the outcome
- Concerns and referrals will be kept in a separate child protection file for each child.

Any non-confidential records will be readily accessible and available. Confidential information and records will be held securely and only available to those who have a right or professional need to see them.

When SupaJam receives a hard copy of a student's safeguarding file the DSL will complete the following actions:

- Confirm receipt of the file using the form provided by the sender, if the form is not provided they will email the DSL of the education provider to confirm.
- The confirmation of receipt will be scanned and uploaded to the student's digital safeguarding file on CPOMS.
- All safeguarding files received will be read within 5 working days from the date of receipt and will be scanned and uploaded onto the student's digital file on CPOMS.
- Key information will be summarised on the student's CPOMS profile confirming that the file has been read by the DSL or a member of the SLT
- All hard copies that have been scanned and uploaded will be stored securely until the end of the academic year when they will be shredded by an appointed member of staff by the DSL.
-

When SupaJam receives a digital safeguarding file by Egress or a similar encryption based platform, the DSL will complete the following:

- Confirm receipt of the file using a secure platform such as Egress or if via email they will use the initials only of the student and will include their date of birth in order to confirm the identity of the student to the relevant professional.
- All safeguarding files received will be read within 5 working days of receipt and will be scanned and uploaded onto the student's digital file on CPOMS.
- The digital file will be stored on the student's CPOMS profile.
- Key information will be summarised on the student's CPOMS profile confirming that the file has been read.

- Safeguarding records relating to individual children will be retained for a reasonable period of time after they have left the college.

When a student leaves SupaJam, the DSL will complete the following:

- Make sure the student's child protection file is transferred to their new school or college as soon as possible (within 5 days for an in-year transfer or within first 5 days of the start of a new term)
- Transfer it separately from the main student file (e.g. in separate envelopes)
- Transfer it securely and get proof of receipt (more on this below)
- They should also consider whether SupaJam should share any additional information with the new school/college before the student leaves, to help the new setting get ready to support the student and help them thrive.

Retention of Safeguarding Records

- Hard copies of student safeguarding records will be converted to electronic records on receipt. After a student has been with SupaJam for 1 year, SupaJam will only retain electronic copies of safeguarding records.
- Electronic safeguarding records relating to individual students will be retained for 10 years after they have left the college, as per GDPR retention of records guidance.
- Where a student transfers to another school/FE college setting, an electronic copy of safeguarding records will be transferred to the new setting within the statutory timeframe and proof of transfer will be obtained.

In addition, if there are significant or complex concerns, and/or social services are involved, the DSL will speak to the DSL of the receiving school/college and provide information to enable them to have time to make any necessary preparations to ensure the safety of the child or young adult.

All safeguarding records are made and kept on CPOMS. CPOMS accounts are set up for all staff regardless of whether they work directly with the students and are given appropriate access dependant on their roles and requirements for safeguarding. For example full access to information is given to DSLs and only necessary access to our learning support staff.

SupaJam will share safeguarding records in line with the Data Protection Act 2018 and with the young person and/or the parent/carers consent. However if the DSLs identify that a child is a risk of harm and the parent/carers and young person do not consent to information being shared, this will surpass the need for consent and DSLs will share the relevant information to concern or risk identified.

In addition:

Appendix 2 sets out our policy on record-keeping specifically with respect to recruitment and pre-appointment checks

Appendix 3 sets out our policy on record-keeping with respect to allegations of abuse made against staff

16. Training

16.1 All staff

All staff members will undertake safeguarding and child protection training at induction, including on whistle-blowing procedures/low level concerns, prevent, child sexual exploitation and online safety, to ensure they understand the SupaJam's safeguarding systems and their responsibilities, and can identify signs of possible abuse, exploitation or neglect.

This training will be regularly updated at least annually and will:

- Be integrated, aligned and considered as part of the whole-school safeguarding approach and wider staff training, and curriculum planning
- Include online safety, including an understanding of the expectations, roles and responsibilities for staff around filtering and monitoring
- Have regard to the Teachers' Standards to support the expectation that all teachers; manage behaviour effectively to ensure a good and safe environment and have a clear understanding of the needs of all students

All staff will have training on the government's anti-radicalisation strategy, Prevent, to enable them to identify children at risk of becoming involved with or supporting terrorism, and to challenge extremist ideas.

Staff will also receive regular safeguarding and child protection updates, including on online safety, as required but at least annually (for example, through emails, e-bulletins and staff meetings).

Contractors who are provided through a private finance initiative (PFI) or similar contract will also receive safeguarding training.

Volunteers will receive appropriate training, if applicable.

16.2 The DSL and Deputy DSL (College Leader)

The DSL and Deputies will undertake Level 3 safeguarding training every 2 years.

In addition, they will take initiative in updating their knowledge and skills at regular intervals throughout the academic year (for example, through external and internal training featuring a wider context of safeguarding, online updates, meeting other DSLs within and outside of the organisation in order to share best practice, taking time to read and digest safeguarding developments).

All DSLs must ensure that they maintain up to date of any statutory safeguarding developments.

They will also undertake more in-depth Prevent awareness training, including on extremist and terrorist ideologies.

16.5 Staff who have contact with students and families

All staff at SupaJam have access to the Employee Assistance Programme which will provide them with support, coaching and training, promote the interests of children and allow for confidential discussions of sensitive issues.

17. Links with other policies

This policy links to the following policies and procedures:

Promoting Positive Behaviour

Staff Code of Conduct

Complaints

Health and Safety (Including First Aid)

Attendance

Online safety

Mobile phone use

Equality and Diversity

Curriculum

Anti-Bullying

Whistle-Blowing

Acceptable Use

18. SupaJam's Policy For Safeguarding Adults (18+)

1. Key legislation and statutory policy/guidance reading list

- The Care Act 2014
- Care & Support Statutory Guidance (updated October 2018) - <https://www.gov.uk/government/publications/care-act-statutory-guidance/care-and-support-statutory-guidance#safeguarding->
- Disability Discrimination Act 1995 / Equality Act 2010
- Human Rights Act 1998

2. Purpose and aims of this policy

2.1 - The purpose of this document is to assist all staff, volunteers, and partners to safeguard and protect learners over the age of 18 who are at risk of abuse or neglect and promote their well-being. This policy also reflects the requirements of the government publication 'Care and Support Statutory Guidance (October 2018)'

2.2 - This policy sets out to promote the principles of the Care Act 2014 in safeguarding and providing support to our vulnerable adult learners with and without learning difficulties/ disabilities.

2.3- We will aim to safeguard adults by:

- Adopting adult protection guidelines through procedures for staff, volunteers, governors and partners.
- Sharing information about adult protection and good practice with young people/ adults, parents and carers, staff and volunteers.
- Sharing information about concerns with agencies who need to know, and involving adult learners appropriately.
- Carefully following the 'safer recruitment' procedures for recruitment and selection of staff and volunteers.
- Providing effective management for staff and volunteers through support, supervision and training

2.4 We are committed to reviewing our policy annually and striving for good practice.

3. Principles of The Care Act 2014

3.1 – The Care Act 2014 sets out six principles which aim to promote a person-centred approach to vulnerable adults' support and wellbeing. These six principles are;

- 1.** Empowerment - supporting vulnerable adults so they can confidently make their own decisions and give informed consent regarding their care, education and future career/ choices about the next stage in their life
- 2.** Protection – support adults in recognising when they may be subject of abuse and when to come for help as well as knowing how to refer to the appropriate authorities
- 3.** Prevention – spotting signs and symptoms early but also preventing any long lasting psychological damage following abuse
- 4.** Proportionality – utilising preventative measures or responses to a safeguarding issue in the most unobtrusive way possible and treating someone as an individual. Taking steps which is proportionate to the issue without applying a 'blanket policy'
- 5.** Partnership – working with partner agencies to support and protect vulnerable adults as well as the individual
- 6.** Accountability – being transparent and open with individuals about what we do and keep them up to date with any actions/outcomes. Consent must be given by the individual prior to any information being submitted.

3.2 – Sections 42 through 47 of the Care Act 2014 outline statutory responsibilities for reporting safeguarding concerns.

4. Commitment to safeguarding in SupaJam Education in Music & Media

4.1. SupaJam Education in Music & Media (SupaJam) is committed to providing all of its staff and students with a safe and enjoyable experience and the welfare of everyone is paramount. The Senior Leadership Team (SLT) will lead the example in creating a culture of vigilance in safeguarding.

4.2. The role of the Designated Safeguarding Leads is to be responsible for leading and championing good safeguarding practices and being the first point of contact for staff who have concerns about our learners. The DSL will usually be responsible for making referrals for any safeguarding concern – however, this does not mean that staff should not be able to take any action themselves. The Designated Safeguarding Leads (DSLs) will be contactable at all times of the working day either in person or via telephone to be able to provide support or guidance to all members of staff with any safeguarding concerns.

4.3. The DSLs will promote a culture of openness and being approachable so that everyone is able to speak openly about safeguarding concerns with confidence that they are being listened to. Regular safeguarding update meetings will occur to keep key members of staff up to date with any developments. Only need-to know information will be shared with staff members at regular team meetings.

4.4. All students will be involved in learning and understanding safeguarding through appropriate sessions, such as small group discussions, PowerPoints and class conversations. As well as being given support and guidance following any safeguarding incident.

4.5. It is also extremely important to recognise that SupaJam supports students who are aged 16- 25 and some are therefore adults who are also studying and socialising with children, as defined by law. SupaJam staff must therefore recognise signs where inappropriate friendships or relationships may develop and manage those situations effectively, maintaining high levels of communication with the Director of Safeguarding and DSLs.

5. Significant harm and abuse – signs & symptoms

5.1. Significant harm - There is no absolute criteria on which to rely when judging what constitutes significant harm. Consideration of the severity of ill-treatment may include the degree and the extent of physical harm, the duration and frequency of abuse and neglect, the extent of premeditation, and the presence or degree of threat, coercion, sadism, and bizarre or unusual elements.

5.2. In principle, safeguarding adults requires the same vigilance and intervention as safeguarding children and young people. Adults are also subject to physical, emotional and sexual abuse and neglect but are further at risk from other types of abuse.

5.3. It is acknowledged that an adult can be abused, harmed or neglected in a family, institution or community setting by someone known to them, or less commonly, by a stranger, this includes someone in a position of trust such as a teacher or other professional.

5.4. It is everyone's responsibility to be vigilant and report signs and symptoms of adult abuse. Staff should use the CPOMS system to report any concerns or incidents to the DSL or, if it is thought to be an emergency, staff should find a DSL or senior manager to report the concern directly to them.

5.5. Types of abuse and signs/symptoms – Please see Appendix A at the end of this document which outlines the different categories as well as some of the signs and symptoms.

6. Responding to Disclosures or Allegations

6.1 It is important that students trust all staff to be able to communicate with them and be able to make allegations/disclosures with the confidence that they will be listened to. When responding to any allegation or disclosure, all staff will;

- Stay calm, listen carefully to what is being said
- Find an appropriate early opportunity to explain that it is likely that the information will need to be shared with others - do not promise to keep secrets
- Allow the student to continue at their own pace
- Ask questions for clarification only, and at all times avoid asking leading questions.
- Reassure the student that they have done the right thing in telling you.
 - Tell them what you will do next and with whom the information will be shared
 - Record in writing what was said using the young person's own words as soon as possible, note the date, time, location, any names mentioned, to whom the information was given and ensure that the record is signed and dated .

6.2. Some students with special educational needs (SEN) may require a different approach from others e.g. in the way their physical/mental health condition might mask possible abuse. Particular attention may have to be given to adults with SEN who may have speech/ language impairments or difficulties as these can make communication difficult. Members of staff talking with these students should seek guidance from the college Designated Safeguarding Lead(s) who will advise as to how the matter should be discussed.

6.3. After an adult has disclosed abuse, the Designated Safeguarding Lead should carefully consider whether or not it is safe for the adult to return home to a potentially abusive situation. The DSL will assess the risk of harm and make the decision to either;

- Monitor the situation, collating evidence through the CPOMS system that may be needed in a later investigation.
- Refer the vulnerable adult to Adult Services within the relevant local authority. If in doubt, a consultation with Kent County Council's Adult Social Care Team should be completed by contacting 03000 416161 or completing the online form at https://kentcc-self.achieveservice.com/en/AchieveForms/?form_uri=sandbox-publish://AF-Process-7467f146-20ac-4fd3-ad8e-879f9d590cfb/AF-Stage-e61ce820-d057-4f3f-8ff9-486a7fff2afb/definition.json&redirectlink=%2Fen&cancelRedirectLink=%2Fen&consentMessage=yes

For SupaJam Brighton please contact Access Point on 01273 295555 or complete the online referral form at <https://www.brighton-hove.gov.uk/adult-social-care/keep-people-safe/help-adult-risk-abuse-or-neglect>

- Call 999 in the event of an immediate risk of harm to the vulnerable adult.

These appendices are based on the Department for Education's statutory guidance, Keeping Children Safe in Education.

Appendix 1: types of abuse

Abuse, including neglect, and safeguarding issues are rarely standalone events that can be covered by 1 definition or label. In most cases, multiple issues will overlap.

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

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Emotional abuse may involve:

- Conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person
- Not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate
- Age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction
- Seeing or hearing the ill-treatment of another
- Serious bullying (including cyber-bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children
- **Sexual abuse** involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve:
 - Physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing
 - Non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet)

Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse.

Once a child is born, neglect may involve a parent or carer failing to:

- Provide adequate food, clothing and shelter (including exclusion from home or abandonment)
- Protect a child from physical and emotional harm or danger
- Ensure adequate supervision (including the use of inadequate care-givers)
- Ensure access to appropriate medical care or treatment

Appendix 2: safer recruitment and DBS checks – policy and procedures

Safer recruitment policy

The safe recruitment of staff in education facilities is the first step to safeguarding and promoting the welfare of children in education. SupaJam is committed to safeguarding and promoting the welfare of all pupils in its care. As an employer, SupaJam expects all staff to possess the ability to work in a way that promotes the safety and wellbeing of young people at all times. In line with recent legislation including the Children Act 2004, Safeguarding Children and Safer Recruitment in Education Guidance DfES/04217/2006, The Independent Colleges Standards Regulations 2009 (Standards 4, 4A, 4B, 4C), the Safeguarding Vulnerable Groups Act 2006, and the Keeping Children Safe in Education with effect from September 2024, SupaJam takes seriously its duty of care for all pupils. In order to help safeguard and promote the welfare of all pupils, SupaJam is committed to a thorough and consistent Safer Recruitment Policy.

Aims and objectives

The aim of the Safer Recruitment policy is to help deter, reject or identify people who might cause harm to pupils or are otherwise unsuited to working with them, by having appropriate procedures for appointing staff.

SupaJam has a principle of open competition in its approach to recruitment and will seek to recruit the best applicant for the job. The recruitment and selection process should ensure the identification of the person best suited to the job, based on the applicant's

abilities, qualifications, experience and merit as measured against the job description and person specification.

The recruitment and selection of staff will be conducted in a professional, timely and responsive manner and in compliance with current employment legislation.

If a member of staff involved in the recruitment process has a close personal or familial relationship with an applicant, they must declare it as soon as they are aware of the individual's application and avoid any involvement in the recruitment, selection and decision-making process. Applicants are also encouraged to disclose any relationships they have with existing staff or persons connected to SupaJam on their application form.

This policy's objectives are to operate this procedure consistently and thoroughly whilst obtaining, collating, analysing and evaluating information from and about applicants applying for job vacancies at SupaJam Education in Music and Media.

Roles and responsibilities

It is the responsibility of the Advisory Board to:

- ensure SupaJam has effective policies and procedures in place for the recruitment of all staff and volunteers in accordance with DfE guidance and legal requirements. This will be maintained through regular check, challenge and quality assurance procedures.

It is the responsibility of the Senior Leadership Team (SLT) and other Leaders involved in recruitment to:

- ensure that SupaJam operates safe recruitment procedures and makes sure all appropriate checks are carried out on all staff and volunteers who work at SupaJam.
- monitor contractors' and agencies' compliance with this document.
- promote the welfare of children and young people at every stage of the procedure.

Definition of Regulated Activity and Frequency

Regulated activity for children and young people is unsupervised activity on a frequent basis, for example, teaching, training, care or supervision, advice or guidance on well-being, or driving a vehicle with children and young people as passengers.

Frequent is once a week or more, on an on-going basis, more than three days within a 30 day period, or overnight.

Recruitment and selection:

Advertising

To ensure equality of opportunity, SupaJam will advertise all vacant posts to encourage as wide a field of applicants as possible; normally this entails an external advertisement. Any advertisement will make clear SupaJam's commitment to safeguarding and promoting the welfare of children. All documentation relating to applicants will be treated confidentially in accordance with GDPR.

Application forms

SupaJam uses its own application form and all applicants for employment will be required to complete an application form in its entirety. Where CVs are received, for example from recruitment agencies, CVs will follow a shortlisting process to determine the candidates that will be asked to complete a full application form as part of the next stage of the recruitment process. CVs that have not been shortlisted to receive an application form will be disregarded.

The application form will include the applicant's employment and education history, and any gaps in employment will need to be explained. SupaJam will use its professional curiosity and caution with regards to any unexplained gaps or discrepancies in the application form. The application form will also include the applicant's declarations regarding any criminal cautions or convictions and whether or not they have lived or worked outside of the UK in the last 5 years. Should an application form be missing any information, SupaJam staff will return it and request that the information be submitted and the form fully completed.

Job descriptions and person specifications

A job description is a key document in the recruitment process, and must be finalised prior to taking any other steps in the recruitment process. It will clearly and accurately set out the duties and responsibilities of the job role. The job description and advert will include a specific reference to the suitability to work with children and young people.

The person specification, issued dependent on role, is of equal importance and informs the selection decision. It details the skills, experience, abilities and expertise that are required to do the job.

References

References for successful applicants will be requested before appointment with the formal offer of employment being subject to satisfactory references. Two professional/character references must be provided, with one being a candidate's current or most recent employer and the other being from an educational setting if they have worked for one. These will always be sought and obtained directly from the referee and their purpose is to provide objective and factual information to support appointment decisions. Any discrepancies or anomalies will be followed up with the referees. SupaJam does not accept open references, testimonials or references from relatives.

Shortlisting

All applications will be subject to fair shortlisting against the job specification and criteria. Candidates will be shortlisted against a matrix to ensure fair and equal shortlisting. Online searches of shortlisted candidates will take place as part of the recruitment process. In line with the recent update in Keeping Children Safe in Education September 2023, during the shortlisting the potential employee's online presence will be reviewed by the Operations Manager or a senior manager. This online search will be conducted via an internet search and a record of this check noted on the applicant tracking system. Any articles or images that are flagged as a concern will be raised with the shortlisting panel for review. Appropriate action will be taken as necessary.

Interviews

There will be a face-to-face interview wherever possible, and the shortlisting panel and interview panel will consist of the same two members of SupaJam staff throughout the recruitment process unless extenuating circumstances prevent this. The interview process will explore the applicant's ability to carry out the job specification and meet the job criteria through structured, pre-planned questions. It will enable the panel to explore any anomalies or gaps that have been identified in order to satisfy themselves that the chosen applicant can meet safeguarding criteria (in line with the KSCMP Safer Recruitment Training).

Any information in regard to past disciplinary action or allegations, cautions or convictions will be discussed and considered in the circumstance of the individual case during the interview process. At least one member of any interviewing panel will have undertaken safer recruitment training or refresher training as applicable. Safeguarding questions will be asked by the qualified safer recruitment panel member.

All successful applicants will be required to produce original documentation of their identity, address and qualifications along with documents to prove their 'Right to work in

the UK'. Acceptable proof of an applicant's right to work in the uk includes a biometric residence permit number, biometric residence card number, UK passport or national identity card.

Offering the post and onboarding

The appointment of all new employees is subject to the receipt of a satisfactory DBS Certificate, references, copies of qualification and proof of identity as well as documents to prove their 'Right to work in the UK'. A personnel file checklist will be used to track and audit paperwork obtained in accordance with the KSCMP Safer Recruitment Training. The checklist will be retained on personnel files.

The Rehabilitation of Offenders Act 1974

The Rehabilitation of Offenders Act 1974 does not apply to positions which involve working with, or having access to pupils. Therefore, any convictions and cautions that would normally be considered 'SPENT' must be declared when applying for any position at SupaJam.

SupaJam will not discriminate against those with past convictions but will take into consideration the nature of the crime, whether the conviction has been spent and the risk of re-offence.

DBS (Disclosure and Barring Service) Certificate (formerly known as CRB Disclosure)

All staff at SupaJam require an enhanced DBS Certificate, and if undertaking regulated activity, barred list checks. Therefore a DBS Certificate must be obtained before the commencement of employment of any new employee. Members of staff at SupaJam are aware of their obligation to inform the Senior Leadership Team of any cautions or convictions that arise following these checks taking place.

Dealing with convictions

SupaJam operates a formal procedure if a DBS Certificate is returned with details of convictions.

Consideration will be given to the Rehabilitation of Offenders Act 1974 and:
the nature, seriousness and relevance of the offence;

- how long ago the offence occurred;
- one-off or history of offences;

- changes in circumstances,
- decriminalisation and remorse.

A formal meeting will take place face-to-face to establish the facts with the Senior Leadership Team. A decision will be made following this meeting.

Proof of Identity, Right to Work in the UK & Verification of Qualifications and/or professional status

All successful applicants will be required to bring their identification documentation such as passport or birth certificate with them as proof of identity/eligibility to work in the UK in accordance with those set out in the Immigration, Asylum and Nationality Act 2006 and DBS Code of Practice Regulations. In addition, applicants must be able to demonstrate that they have obtained any academic or vocational qualification legally required for the position and claimed in their application form.

Medical Fitness

Anyone appointed to a post involving regular contact with young people must possess the appropriate level of physical and mental fitness to ensure students receive a high level of support. Where a candidate is concerned that they may not possess the appropriate levels, this should be discussed with the recruitment panel.

Overseas checks

All new employees where persons have lived outside the UK are subject to additional checks in accordance with Immigration, Asylum and Nationality Act 2006. If SupaJam hires new foreign members of staff, it will, in accordance with the UK Border Agency Code of Practice, sponsor said staff to work legally in the UK. In addition, applicants who have lived/travelled abroad for more than 3 months will need to obtain a police check from the relevant country.

Additional checks

When a new teacher joins SupaJam, a check is made against the NCTL List of Prohibited Teachers and the EEA sanctioned list.

Onboarding (Induction) process

To ensure that all staff are properly inducted into their roles at SupaJam, we will:

- Introduce them to the team

- Allow time to read policies and procedures including whistleblowing and safeguarding
- Deliver a safeguarding and health and safety introduction
- Ensure relevant training is provided
- Where possible, assign a regular mentor to guide them for the first term of employment.
- Check that candidates taking up a management position are not subject to a prohibition from management (section 128) direction made by the secretary of state.

Single Central Record of Members of Staff

In addition to the various staff records kept in SupaJam and on individual personnel files, a Single Central Record of recruitment and vetting checks is kept in accordance with the Department for Education's requirements. This will give an overview of:

- all employees who are employed to work at SupaJam
- all employees who are employed as supply staff to SupaJam whether employed directly or through an agency
- all others who have been chosen by SupaJam to work in regular contact with young people.

This will cover volunteers, advisors, peripatetic staff and people brought into SupaJam to provide additional teaching or instruction for pupils but who are not staff members e.g: yoga teachers etc.

The Operations Manager will be responsible for collecting all necessary information from staff in order to complete the Single Central Record. The Director of Safeguarding will be responsible for auditing the Single Central Record and reporting their findings to the full Advisory Board.

Probationary period

All permanent roles will be subject to a probationary period, as set out in the successful candidate's contract. Within this probation period, employees will be subject to a mid-term and end term review to ensure continued satisfactory performance. For agency workers or contractors that become permanent employees, the probationary period will come into effect as per the start date outlined in their SupaJam contract.

Employment and Existing Staff

In certain circumstances we will carry out all the relevant checks on existing staff as if the individual was a new member of staff. These circumstances are when:

- There are concerns about an existing member of staff's suitability to work with children; or

- An individual moves from a post that is not regulated activity to one that is; or
- There has been a break in service of 12 weeks or more

We will refer to the DBS anyone who has harmed, or poses a risk of harm, to a child or vulnerable adult where:

- We believe the individual has engaged in [relevant conduct](#); or
- We believe the individual has received a caution or conviction for a relevant (automatic barring either with or without the right to make representations) offence, under the [Safeguarding Vulnerable Groups Act 2006 \(Prescribed Criteria and Miscellaneous Provisions\) Regulations 2009](#); or
- We believe the 'harm test' is satisfied in respect of the individual (i.e. they may harm a child or vulnerable adult or put them at risk of harm); and
- The individual has been removed from working in regulated activity (paid or unpaid) or would have been removed if they had not left

Contractors

We will ensure that any contractor, or any employee of the contractor, who is to work at the school has had the appropriate level of DBS check (this includes contractors who are provided through a PFI or similar contract). This will be:

- An enhanced DBS check with barred list information for contractors engaging in regulated activity
- An enhanced DBS check, not including barred list information, for all other contractors who are not in regulated activity but whose work provides them with an opportunity for regular contact with children
- We will obtain the DBS check for self-employed contractors.

We will not keep copies of such checks for longer than 6 months.

Contractors who have not had any checks will not be allowed to work unsupervised or engage in regulated activity under any circumstances.

We will check the identity of all contractors and their staff on arrival at SupaJam

SupaJam recognises that safer recruitment and selection is not just about the start of employment, but should be part of a larger policy framework for all staff. SupaJam will therefore provide on-going training and support for all staff. Despite the best efforts to recruit safely there will be occasions when allegations of abuse against children and young people are raised. In cases relating to the behaviour of an employee that are within the context of the four categories of abuse (i.e: physical, sexual, emotional and neglect) SupaJam's Disciplinary Policy will apply. In cases of dismissal due to the above behaviour, SupaJam will inform the Department for Education and the Children's Safeguarding Unit of the circumstances of why the employee is leaving employment.

Agency Workers

All recruitment agencies are expected to send written confirmation that the necessary checks have been undertaken prior to an agency worker's placement at SupaJam. On the agency worker's first day at SupaJam, they will be asked to produce ID to confirm their identity. When an agency worker is taken on as a permanent employee, they will be required to complete an application form and the necessary checks will be conducted by the Operations Lead, including running a new DBS certificate. During this time, checks from their previous agency employer will fulfil the requirements of assessing the risk of the agency worker whilst working with our students.

Volunteers

We will:

- Never leave an unchecked volunteer unsupervised or allow them to work in regulated activity
- Obtain an enhanced DBS check with barred list information for all volunteers who are new to working in regulated activity
- Carry out a risk assessment when deciding whether to seek an enhanced DBS check without barred list information for any volunteers not engaging in regulated activity. We will retain a record of this risk assessment

Staff working in alternative provision settings

Where we place a student with an alternative provision provider, we obtain written confirmation from the provider that they have carried out the appropriate safeguarding checks on individuals working there that we would otherwise perform.

Adults who supervise pupils on work experience

When organising work experience, we will ensure that policies and procedures are in place to protect children from harm.

Visiting speakers

The College frequently makes use of external speakers covering both academic and wider curriculum topics.

Visiting speakers must:

- Agree to the code of conduct that outlines SupaJam's expectations around behaviour and content displayed to staff and young people (Expectations for Visitors and Guest Speakers)

- Have had an internet search completed by the member of staff organising the visit, prior to the event
- Be accompanied by a SupaJam member of staff at all times
- Wear a visitor's lanyard clearly identifying them as a visitor to SupaJam

Yellow Lanyard = has undergone relevant checks and is not required to be supervised

Red Lanyard = has not undergone relevant checks and requires supervision at all times

- Complete the visitor's induction with the receptionist and sign in before entering any SupaJam building

Monitoring and evaluation

The Director of Safeguarding will be responsible for ensuring that this policy is monitored and implemented throughout SupaJam. This policy has been impact assessed with regard to equality and inclusion and safeguarding.

Disclaimer

This policy does not form part of your term and conditions of employment. We reserve the right to amend, shorten or to not follow this policy for employees under two years service.

Appendix 3: allegations of abuse made against staff

Allegations against staff (including low-level concerns) policy

Section 1: allegations that may meet the harm threshold

This section applies to all cases in which it is alleged that a current member of staff, including a supply teacher, volunteer or contractor, has:

- Behaved in a way that has harmed a child, or may have harmed a child, and/or
- Possibly committed a criminal offence against or related to a child, and/or
- Behaved towards a child or children in a way that indicates they may pose a risk of harm to children, and/or
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children – this includes behaviour taking place both inside and outside of school

If we're in any doubt as to whether a concern meets the harm threshold, we will consult our local authority designated officer (LADO).

We will deal with any allegation of abuse quickly, in a fair and consistent way that provides effective child protection while also supporting the individual who is the subject of the allegation.

A 'case manager' will lead any investigation. This will be a member of SLT. The case manager will be identified at the earliest opportunity.

Our procedures for dealing with allegations will be applied with common sense and judgement.

If we receive an allegation of an incident happening while an individual or organisation was using the school premises to run activities for children, we will follow our safeguarding policies and procedures and inform our LADO (LESAS)

Suspension of the accused until the case is resolved

Suspension of the accused will not be the default position, and will only be considered in cases where there is reason to suspect that a child or other children is/are at risk of harm, or the case is so serious that there might be grounds for dismissal. In such cases, we will only suspend an individual if we have considered all other options available and there is no reasonable alternative.

Based on an assessment of risk, we will consider alternatives such as:

- Redeployment within the college so that the individual does not have direct contact with the child or children concerned
- Providing an assistant to be present when the individual has contact with children
- Redeploying the individual to alternative work in the college so that they do not have unsupervised access to children
- Moving the child or children to classes where they will not come into contact with the individual, making it clear that this is not a punishment and parents/carers have been consulted
- Temporarily redeploying the individual to another role in a different location, for example to an alternative base.

If in doubt, the case manager will seek views from the the designated officer at the local authority, as well as the police and local authority children's social care where they have been involved.

Definitions for outcomes of allegation investigations

Substantiated: there is sufficient evidence to prove the allegation

Malicious: there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive, or to cause harm to the subject of the allegation

False: there is sufficient evidence to disprove the allegation

Unsubstantiated: there is insufficient evidence to either prove or disprove the allegation (this does not imply guilt or innocence)

Unfounded: to reflect cases where there is no evidence or proper basis which supports the allegation being made

Procedure for dealing with allegations

In the event of an allegation that meets the criteria above, the case manager will take the following steps:

- Conduct basic enquiries in line with local procedures to establish the facts to help determine whether there is any foundation to the allegation before carrying on with the steps below
- Discuss the allegation with the designated officer at the local authority. This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or local authority children's social care services. (The case manager may, on occasion, consider it necessary to involve the police *before* consulting the designated officer – for example, if the accused individual is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. In such cases, the case manager will notify the designated officer as soon as practicably possible after contacting the police)
- Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the designated officer (and the police or local authority children's social care services, where necessary). Where the police and/or local authority children's social care services are involved, the case manager will only share such information with the individual as has been agreed with those agencies
- Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with children at the school is justified or whether alternative arrangements such as those outlined above can be put in place. Advice will be sought from the designated officer, police and/or local authority children's social care services, as appropriate
- Where the case manager is concerned about the welfare of other children in the community or the individual's family, they will discuss these concerns with the DSL and make a risk assessment of the situation. If necessary, the DSL may make a referral to local authority children's social care
- **If immediate suspension is considered necessary**, agree and record the rationale for this with the local authority designated officer. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at the school and their contact details
- **If it is decided that no further action is to be taken** in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the designated officer what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation

- **If it is decided that further action is needed**, take steps as agreed with the designated officer to initiate the appropriate action in college and/or liaise with the police and/or local authority children's social care services as appropriate

SupaJam will;

- provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and considering what other support is appropriate.
- Inform the parents or carers of the child/children involved about the allegation as soon as possible if they do not already know (following agreement with local authority children's social care services and/or the police, if applicable). The case manager will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against teachers (where this applies) while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice
- Keep the parents or carers of the child/children involved informed of the progress of the case (only in relation to their child – no information will be shared regarding the staff member)
- Make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child.

If SupaJam is made aware that the secretary of state has made an interim prohibition order in respect of an individual, we will immediately suspend that individual from teaching, pending the findings of the investigation by the Teaching Regulation Agency.

Where the police are involved, wherever possible SupaJam will ask the police at the start of the investigation to obtain consent from the individuals involved to share their statements and evidence for use in the college's disciplinary process, should this be required at a later point.

Additional considerations for supply teachers and all contracted staff

If there are concerns or an allegation is made against someone not directly employed by SupaJam, such as a supply teacher or contracted staff member provided by an agency, we will take the actions below in addition to our standard procedures.

- We will not decide to stop using an individual due to safeguarding concerns without finding out the facts and liaising with our LADO (LESAS) to determine a suitable outcome
- We will address issues such as information sharing, to ensure any previous concerns or allegations known to the agency are taken into account (we will do this, for example, as part of the allegations management meeting or by liaising directly with the agency where necessary)

- When using an agency, we will inform them of our process for managing allegations, and keep them updated about our policies as necessary, and will invite the agency's HR manager or equivalent to meetings as appropriate.

Timescales

We will deal with all allegations as quickly and effectively as possible and will endeavour to comply with the following timescales, where reasonably practicable:

- Any cases where it is clear immediately that the allegation is unsubstantiated or malicious should be resolved within 1 week
- If the nature of an allegation does not require formal disciplinary action, appropriate action should be taken within 3 working days
- If a disciplinary hearing is required and can be held without further investigation, this should be held within 15 working days

However, these are objectives only and where they are not met, we will endeavour to take the required action as soon as possible thereafter.

Action following a criminal investigation or prosecution

The case manager will discuss with the local authority's designated officer whether any further action, including disciplinary action, is appropriate and, if so, how to proceed, taking into account information provided by the police and/or local authority children's social care services.

Conclusion of a case where the allegation is substantiated

If the allegation is substantiated and the individual is dismissed or SupaJam ceases to use their services, or the individual resigns or otherwise ceases to provide their services, SupaJam will make a referral to the DBS for consideration of whether inclusion on the barred lists is required.

If the individual concerned is a member of teaching staff, SupaJam will consider whether to refer the matter to the Teaching Regulation Agency to consider prohibiting the individual from teaching.

Individuals returning to work after suspension

If it is decided on the conclusion of a case that an individual who has been suspended can return to work, the case manager will consider how best to facilitate this.

The case manager will also consider how best to manage the individual's contact with the child or children who made the allegation, if they are still attending SupaJam.

Unsubstantiated, unfounded, false or malicious reports

If a report is:

- Determined to be unsubstantiated, unfounded, false or malicious, the DSL will consider the appropriate next steps. If they consider that the child and/or person who made the

allegation is in need of help, or the allegation may have been a cry for help, a referral to local authority children's social care may be appropriate

- Shown to be deliberately invented, or malicious, SupaJam will consider whether any disciplinary action is appropriate against the individual(s) who made it

Unsubstantiated, unfounded, false or malicious allegations

If an allegation is:

- Determined to be unsubstantiated, unfounded, false or malicious, the LADO and case manager will consider the appropriate next steps. If they consider that the child and/or person who made the allegation is in need of help, or the allegation may have been a cry for help, a referral to local authority children's social care may be appropriate
- Shown to be deliberately invented, or malicious, SupaJam will consider whether any disciplinary action is appropriate against the individual(s) who made it

Confidentiality and information sharing

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

The case manager will take advice from the LADO (LESAS), police and local authority children's social care services, as appropriate, to agree:

- Who needs to know about the allegation and what information can be shared
- How to manage speculation, leaks and gossip, including how to make parents or carers of a child/children involved aware of their obligations with respect to confidentiality
- What, if any, information can be reasonably given to the wider community to reduce speculation
- How to manage press interest if, and when, it arises

Record-keeping

The case manager will maintain clear records about any case where the allegation or concern meets the criteria above and store them on the individual's confidential personnel file for the duration of the case.

The records of any allegation that, following an investigation, is found to be malicious or false will be deleted from the individual's personnel file (unless the individual consents for the records to be retained on the file).

For all other allegations (which are not found to be malicious or false), the following information will be kept on the file of the individual concerned:

- A clear and comprehensive summary of the allegation
- Details of how the allegation was followed up and resolved
- Notes of any action taken, decisions reached and the outcome
- A declaration on whether the information will be referred to in any future reference

In these cases, SupaJam will provide a copy to the individual, in agreement with local authority children's social care or the police as appropriate.

We will retain all records at least until the accused individual has reached normal pension age, or for 10 years from the date of the allegation if that is longer.

References

When providing employer references, we will:

- Not refer to any allegation that has been found to be false, unfounded, unsubstantiated or malicious, or any repeated allegations which have all been found to be false, unfounded, unsubstantiated or malicious
- Include substantiated allegations, provided that the information is factual and does not include opinions

Learning lessons

After any cases where the allegations are *substantiated*, the case manager will review the circumstances of the case with the local authority's designated officer to determine whether there are any improvements that we can make to SupaJam's procedures or practice to help prevent similar events in the future.

This will include consideration of (as applicable):

- Issues arising from the decision to suspend the member of staff
- The duration of the suspension
- Whether or not the suspension was justified
- The use of suspension when the individual is subsequently reinstated. We will consider how future investigations of a similar nature could be carried out without suspending the individual

For all other cases, the case manager will consider the facts and determine whether any improvements can be made.

Non-recent allegations

Abuse can be reported, no matter how long ago it happened.

We will report any non-recent allegations made by a child to the LADO in line with our local authority's procedures for dealing with non-recent allegations.

Where an adult makes an allegation to SupaJam that they were abused as a child, we will advise the individual to report the allegation to the police.

Section 2: concerns that do not meet the harm threshold

This section is based on 'Section 2: Concerns that do not meet the harm threshold' in part 4 of Keeping Children Safe in Education 2024.

This section applies to all concerns (including allegations) about members of staff, including supply teachers, volunteers and contractors, which do not meet the harm threshold set out in section 1 above.

Concerns may arise through, for example:

- Suspicion
- Complaint
- Safeguarding concern or allegation from another member of staff
- Disclosure made by a child, parent or other adult within or outside SupaJam
- Pre-employment vetting checks

We recognise the importance of responding to and dealing with any concerns in a timely manner to safeguard the welfare of children.

Definition of low-level concerns

The term 'low-level' concern is any concern – no matter how small – that an adult working in or on behalf of SupaJam may have acted in a way that:

Is inconsistent with the staff code of conduct, including inappropriate conduct outside of work, **and**

Does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the designated officer at the local authority

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

- Being overly friendly with children
- Having favourites
- Taking photographs of children on their mobile phone
- Engaging with a child on a one-to-one basis in a secluded area or behind a closed door
- Humiliating pupils

Sharing low-level concerns

We recognise the importance of creating a culture of openness, trust and transparency to encourage all staff to confidentially share low-level concerns so that they can be addressed appropriately.

We will create this culture by:

- Ensuring staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others
- Empowering staff to share any low-level concerns

- Empowering staff to self-refer
- Addressing unprofessional behaviour and supporting the individual to correct it at an early stage
- Providing a responsive, sensitive and proportionate handling of such concerns when they are raised
- Helping to identify any weakness in the SupaJam's safeguarding system

Responding to low-level concerns

If the concern is raised via a third party, the Director of Safeguarding will collect evidence where necessary by speaking:

- Directly to the person who raised the concern, unless it has been raised anonymously
- To the individual involved and any witnesses

The Director of Safeguarding will use the information collected to categorise the type of behaviour and determine any further action, in line with the SupaJam's Staff Code of Conduct. The Director of Safeguarding will be the ultimate decision-maker in respect of all low-level concerns, though they may wish to collaborate with the DSL of the base location or SLT.

Record keeping

All low-level concerns will be recorded in writing. In addition to details of the concern raised, records will include the context in which the concern arose, any action taken and the rationale for decisions and action taken.

Records will be:

- Kept confidential, held securely and comply with the DPA 2018 and UK GDPR
- Reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, we will decide on a course of action, either through our disciplinary procedures or, where a pattern of behaviour moves from a concern to meeting the harm threshold as described in section 1 of this appendix, we will refer it to the designated officer at the local authority
- Retained at least until the individual leaves employment at SupaJam. Where a low-level concern relates to a supply teacher or contractor, we will notify the individual's employer, so any potential patterns of inappropriate behaviour can be identified.

References

We will not include low-level concerns in references unless:

- The concern (or group of concerns) has met the threshold for referral to the designated officer at the local authority and is found to be substantiated; and/or
- The concern (or group of concerns) relates to issues which would ordinarily be included in a reference, such as misconduct or poor performance

Appendix 4: specific safeguarding issues

Assessing adult-involved nude and semi-nude sharing incidents

This section is based on annex A of the UK Council of Internet Safety's [advice for education settings](#).

All adult-involved nude and semi-nude image sharing incidents are child sexual abuse offences and must immediately be referred to police/social care. However, as adult-involved incidents can present as child-on-child nude/semi-nude sharing, it may be difficult to initially assess adult involvement.

There are two types of common adult-involved incidents: sexually motivated incidents and financially motivated incidents.

Sexually motivated incidents

In this type of incident, an adult offender obtains nude and semi-nudes directly from a child or young person using online platforms.

To make initial contact, the offender may present as themselves or use a false identity on the platform, sometimes posing as a child or young person to encourage a response and build trust. The offender often grooms the child or young person on social media, in chatrooms or on gaming platforms, and may then move the conversation to a private messaging app or an end-to-end encrypted (E2EE) environment where a request for a nude or semi-nude is made. To encourage the child or young person to create and share nude or semi-nude, the offender may share pornography or child sexual abuse material (images of other young people), including AI-generated material.

Once a child or young person shares a nude or semi-nude, an offender may blackmail the child or young person into sending more images by threatening to release them online and/or send them to friends and family.

Potential signs of adult-involved grooming and coercion can include the child or young person being:

- Contacted by an online account that they do not know but appears to be another child or young person

- Quickly engaged in sexually explicit communications, which may include the offender sharing unsolicited images
- Moved from a public to a private/E2EE platform
- Coerced/pressured into doing sexual things, including creating nudes and semi-nudes
- Offered something of value such as money or gaming credits
- Threatened or blackmailed into carrying out further sexual activity. This may follow the child or young person initially sharing the image or the offender sharing a digitally manipulated image of the child or young person to extort 'real' images

Financially motivated incidents

Financially motivated sexual extortion (often known as 'sextortion') is an adult-involved incident in which an adult offender (or offenders) threatens to release nudes or semi-nudes of a child or young person unless they pay money or do something else to benefit them.

Unlike other adult-involved incidents, financially motivated sexual extortion is usually carried out by offenders working in sophisticated organised crime groups (OCGs) overseas and are only motivated by profit. Adults are usually targeted by these groups too.

Offenders will often use a false identity, sometimes posing as a child or young person, or hack another young person's account to make initial contact. To financially blackmail the child or young person, they may:

- Groom or coerce the child or young person into sending nudes or semi-nudes and financially blackmail them
- Use images that have been stolen from the child or young person taken through hacking their account
- Use digitally manipulated images, including AI-generated images, of the child or young person
- The offender may demand payment or the use of the victim's bank account for the purposes of money laundering.
- Potential signs of adult-involved financially motivated sexual extortion can include the child or young person being
 - Contacted by an online account that they do not know but appears to be another child or young person. They may be contacted by a hacked account of a child or young person
 - Quickly engaged in sexually explicit communications which may include the offender sharing an image first
 - Moved from a public to a private/E2EE platform
 - Pressured into taking nudes or semi-nudes

- Told they have been hacked and they have access to their images, personal information and contacts
- Blackmailed into sending money or sharing bank account details after sharing an image or the offender sharing hacked or digitally manipulated images of the child or young person

Children who are absent from education

A child being absent from education, particularly repeatedly, can be a warning sign of a range of safeguarding issues. This might include abuse or neglect, such as sexual abuse or exploitation or child criminal exploitation, or issues such as mental health problems, substance abuse, radicalisation, FGM or forced marriage.

There are many circumstances where a child may be absent or become missing from education, but some children are particularly at risk. These include children who:

- Are at risk of harm or neglect
- Are at risk of forced marriage or FGM
- Come from Gypsy, Roma, or Traveller families
- Come from the families of service personnel
- Go missing or run away from home or care
- Are supervised by the youth justice system
- Cease to attend a school
- Come from new migrant families

We will follow our procedures for unauthorised absence and for dealing with children who are absent from education, particularly on repeat occasions, to help identify the risk of abuse, exploitation and neglect, including sexual exploitation, and to help prevent the risks of going missing in future. This includes informing the local authority if a child leaves the school without a new school being named, and adhering to requirements with respect to sharing information with the local authority, when applicable, when removing a child's name from the admission register at non-standard transition points.

Staff will be trained in signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns which may be related to being absent, such as travelling to conflict zones, FGM and forced marriage.

If a staff member suspects that a child is suffering from harm or neglect, we will follow local child protection procedures, including with respect to making reasonable enquiries. We will make an immediate referral to the local authority children's social care team, and the police, if the child is suffering or likely to suffer from harm, or in immediate danger.

Child criminal exploitation

Child criminal exploitation (CCE) is a form of abuse where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into criminal activity. It may involve an exchange for something the victim needs or wants, and/or for the financial or other advantage of the perpetrator or facilitator, and/or through violence or the threat of violence.

The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse.

The victim can be exploited even when the activity appears to be consensual. It does not always involve physical contact and can happen online. For example, young people may be forced to work in cannabis factories, coerced into moving drugs or money across the country (county lines), forced to shoplift or pickpocket, or to threaten other young people.

Indicators of CCE can include a child:

- Appearing with unexplained gifts or new possessions
- Associating with other young people involved in exploitation
- Suffering from changes in emotional wellbeing
- Misusing drugs and alcohol
- Going missing for periods of time or regularly coming home late
- Regularly missing school or education
- Not taking part in education

If a member of staff suspects CCE, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the local authority's children's social care team and the police, if appropriate.

Child sexual exploitation

Child sexual exploitation (CSE) is a form of child sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity. It may involve an exchange for something the victim needs or wants and/or for the financial advantage or increased status of the perpetrator or facilitator. It may, or may not, be accompanied by violence or threats of violence.

The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse.

The victim can be exploited even when the activity appears to be consensual. Children or young people who are being sexually exploited may not understand that they are being abused. They often trust their abuser and may be tricked into believing they are in a loving, consensual relationship.

CSE can include both physical contact (penetrative and non-penetrative acts) and non-contact sexual activity. It can also happen online. For example, young people may be persuaded or forced to share sexually explicit images of themselves, have sexual conversations by text, or take part in sexual activities using a webcam. CSE may also occur without the victim's immediate knowledge, for example through others copying videos or images.

In addition to the CCE indicators above, indicators of CSE can include a child:

- Having an older boyfriend or girlfriend
- Suffering from sexually transmitted infections or becoming pregnant

If a member of staff suspects CSE, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the local authority's children's social care team and the police, if appropriate.

Child-on-child abuse

Child-on-child abuse is when children abuse other children. This type of abuse can take place inside and outside of school. It can also take place both face-to-face and online, and can occur simultaneously between the two.

SupaJam has a zero-tolerance approach to sexual violence and sexual harassment. We recognise that even if there are no reports, that doesn't mean that this kind of abuse isn't happening.

Child-on-child abuse is most likely to include, but may not be limited to:

- Bullying (including cyber-bullying, prejudice-based and discriminatory bullying)
- Abuse in intimate personal relationships between children (this is sometimes known as 'teenage relationship abuse')
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
- Sexual violence, such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence)
- Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse

- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- Consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery)
- Upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm
- Initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element)

Where children abuse their peers online, this can take the form of, for example, abusive, harassing, and misogynistic messages; the non-consensual sharing of indecent images, especially around chat groups; and the sharing of abusive images and pornography, to those who don't want to receive such content.

If staff have any concerns about child-on-child abuse, or a child makes a report to them, they will follow SupaJam' procedures as set out in the Child On Child abuse section of this policy.

When considering instances of harmful sexual behaviour between children, we will consider their ages and stages of development. We recognise that children displaying harmful sexual behaviour have often experienced their own abuse and trauma, and will offer them appropriate support.

Domestic abuse

Children can witness and be adversely affected by domestic abuse and/or violence at home where it occurs between family members. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse (abuse in intimate personal relationships between children) and child/adolescent to parent violence and abuse. It can be physical, sexual, financial, psychological or emotional. It can also include ill treatment that isn't physical, as well as witnessing the ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects.

Anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socioeconomic status, sexuality or background, and domestic abuse can take place inside or outside of the home. Children who witness domestic abuse are also victims.

Older children may also experience and/or be the perpetrators of domestic abuse and/or violence in their own personal relationships. This can include sexual harassment.

Exposure to domestic abuse and/or violence can have a serious, long-lasting emotional and psychological impact on children and affect their health, wellbeing, development and ability to learn.

If police are called to an incident of domestic abuse and any children in the household have experienced the incident, the police will inform a key adult in SupaJam, Riannan Martin, Rachel Maigrot or Hannah Goslett, before the child or children arrive at college the following day. This is the procedure where police forces are part of Operation Encompass.

The DSL will provide support according to the child's needs and update records about their circumstances.

Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare.

The DSL and deputies will be aware of contact details and referral routes in to the local housing authority so they can raise/progress concerns at the earliest opportunity (where appropriate and in accordance with local procedures).

Where a child has been harmed or is at risk of harm, the DSL will also make a referral to local authority children's social care.

So-called 'honour-based' abuse (including FGM and forced marriage)

So-called 'honour-based' abuse (HBA) encompasses incidents or crimes committed to protect or defend the honour of the family and/or community, including FGM, forced marriage, and practices such as breast ironing.

Abuse committed in this context often involves a wider network of family or community pressure and can include multiple perpetrators.

All forms of HBA are abuse and will be handled and escalated as such. All staff will be alert to the possibility of a child being at risk of HBA or already having suffered it. If staff have a concern, they will speak to the DSL, who will activate local safeguarding procedures.

FGM

The DSL will make sure that staff have access to appropriate training to equip them to be alert to children affected by FGM or at risk of FGM.

Section 7.3 of this policy sets out the procedures to be followed if a staff member discovers that an act of FGM appears to have been carried out or suspects that a student is at risk of FGM.

Indicators that FGM has already occurred include:

1. A student confiding in a professional that FGM has taken place

2. A mother/family member disclosing that FGM has been carried out
3. A family/student already being known to social services in relation to other safeguarding issues

A girl:

- Having difficulty walking, sitting or standing, or looking uncomfortable
- Finding it hard to sit still for long periods of time (where this was not a problem previously)
- Spending longer than normal in the bathroom or toilet due to difficulties urinating
- Having frequent urinary, menstrual or stomach problems
- Avoiding physical exercise or missing PE
- Being repeatedly absent from school, or absent for a prolonged period
- Demonstrating increased emotional and psychological needs – for example, withdrawal or depression, or significant change in behaviour
- Being reluctant to undergo any medical examinations
- Asking for help, but not being explicit about the problem
- Talking about pain or discomfort between her legs

Potential signs that a student may be at risk of FGM include:

- The girl's family having a history of practising FGM (this is the biggest risk factor to consider)
- FGM being known to be practised in the girl's community or country of origin
- A parent or family member expressing concern that FGM may be carried out
- A family not engaging with professionals (health, education or other) or already being known to social care in relation to other safeguarding issues

A girl:

- Having a mother, older sibling or cousin who has undergone FGM
- Having limited level of integration within UK society
- Confiding to a professional that she is to have a "special procedure" or to attend special occasion to "become a woman"

- Talking about a long holiday to her country of origin or another country where the practice is prevalent, or parents/carers stating that they or a relative will take the girl out of the country for a prolonged period
- Requesting help from a teacher or another adult because she is aware or suspects that she is at immediate risk of FGM
- Talking about FGM in conversation – for example, a girl may tell other children about it (although it is important to take into account the context of the discussion)
- Being unexpectedly absent from school
- Having sections missing from her 'red book' (child health record) and/or attending a travel clinic or equivalent for vaccinations/anti-malarial medication

The above indicators and risk factors are not intended to be exhaustive.

Forced marriage

Forcing a person into marriage is a crime. A forced marriage is one entered into without the full and free consent of 1 or both parties and where violence, threats, or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological.

It is also illegal to cause a child under the age of 18 to marry, even if violence, threats or coercion are not involved.

Staff will receive training around forced marriage and the presenting symptoms. We are aware of the '1 chance' rule, i.e. we may only have 1 chance to speak to the potential victim and only 1 chance to save them.

If a member of staff suspects that a student is being forced into marriage, they will speak to the student about their concerns in a secure and private place. They will then report this to the DSL.

The DSL will:

- Speak to the student about the concerns in a secure and private place
- Activate the local safeguarding procedures and refer the case to the local authority's designated officer
- Seek advice from the Forced Marriage Unit on 020 7008 0151 or fm@fco.gov.uk
- Refer the student to the Local Authority Children's Integrated Services (Front Door)

Preventing radicalisation

Radicalisation refers to the process of a person legitimising support for, or use of, terrorist violence

Extremism is the promotion or advancement of an ideology based on violence, hatred or intolerance, that aims to:

- Negate or destroy the fundamental rights and freedoms of others; or
- Undermine, overturn or replace the UK's system of liberal parliamentary democracy and democratic rights; or
- Intentionally create a permissive environment for others to achieve the results outlined in either of the above points

Terrorism is an action that:

- Endangers or causes serious violence to a person/people;
- Causes serious damage to property; or
- Seriously interferes or disrupts an electronic system

The use or threat of terrorism must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

Schools and Colleges have a duty to prevent children and young people from becoming involved with or supporting terrorism. The DSL, or designated Prevent lead, will undertake in-depth Prevent awareness training, including on extremist and terrorist ideologies. They'll make sure that staff have access to appropriate training to equip them to identify children at risk.

We will assess the risk of children and young people in SupaJam from becoming involved with or supporting terrorism. This assessment will be based on an understanding of the potential risk in our local area, in collaboration with our local safeguarding partners and local police force.

We will ensure that suitable internet filtering is in place, and equip our students to stay safe online at college and at home.

There is no single way of identifying an individual who is likely to be susceptible to radicalisation into terrorism. Radicalisation can occur quickly or over a long period.

Staff will be alert to changes in students' behaviour.

The government website [Educate Against Hate](#) and charity [NSPCC](#) say that signs that a pupil is being radicalised can include:

- Refusal to engage with, or becoming abusive to, peers who are different from themselves
- Becoming susceptible to conspiracy theories and feelings of persecution
- Changes in friendship groups and appearance
- Rejecting activities they used to enjoy
- Converting to a new religion

- Isolating themselves from family and friends
- Talking as if from a scripted speech
- An unwillingness or inability to discuss their views
- A sudden disrespectful attitude towards others
- Increased levels of anger
- Increased secretiveness, especially around internet use
- Expressions of sympathy for extremist ideologies and groups, or justification of their actions
- Accessing extremist material online, including on Facebook or 'X'
- Possessing extremist literature
- Being in contact with extremist recruiters and joining, or seeking to join, extremist organisations

Children and young people who are at risk of radicalisation may have low self-esteem, or be victims of bullying or discrimination. It is important to note that these signs can also be part of normal teenage behaviour – staff should have confidence in their instincts and seek advice if something feels wrong.

If staff are concerned about a student, they will follow SupaJam's procedures set out in this policy, including discussing their concerns with the DSL.

Staff should **always** take action if they are worried.

Sexual violence and sexual harassment between children in schools

Sexual violence and sexual harassment can occur:

- Between two children of any age and sex
- Through a group of children sexually assaulting or sexually harassing a single child or group of children
- Online and face to face (both physically and verbally)
- Sexual violence and sexual harassment exist on a continuum and may overlap.

Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their

educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school.

If a victim reports an incident, it is essential that staff make sure they are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting any form of abuse or neglect. Nor should a victim ever be made to feel ashamed for making a report.

When supporting victims, staff will:

- Reassure victims that the law on child-on-child abuse is there to protect them, not criminalise them
- Regularly review decisions and actions, and update policies with lessons learnt
- Look out for potential patterns of concerning, problematic or inappropriate behaviour, and decide on a course of action where we identify any patterns
- Consider if there are wider cultural issues within the school that enabled inappropriate behaviour to occur and whether revising policies and/or providing extra staff training could minimise the risk of it happening again
- Remain alert to the possible challenges of detecting signs that a child has experienced sexual violence, and show sensitivity to their needs
- Some groups are potentially more at risk. Evidence shows that girls, children with SEN and/or disabilities, and lesbian, gay, bisexual and transgender (LGBT) children are at greater risk.

Staff should be aware of the importance of:

- Challenging inappropriate behaviours
- Making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up
- Challenging physical behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them

If staff have any concerns about sexual violence or sexual harassment, or a child makes a report to them, they will follow the procedures set out in section 7 of this policy, as appropriate. In particular, section 7.8 and 7.9 set out more detail about our school's approach to this type of abuse.

Serious violence

Indicators which may signal that a child is at risk from, or involved with, serious violent crime may include:

- Increased absence from college
- Change in friendships or relationships with older individuals or groups
- Significant decline in performance
- Signs of self-harm or a significant change in wellbeing
- Signs of assault or unexplained injuries

Unexplained gifts or new possessions (this could indicate that the child has been approached by, or is involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation (see above))

Risk factors which increase the likelihood of involvement in serious violence include:

- Being male
- Having been frequently absent or permanently excluded from school
- Having experienced child maltreatment
- Having been involved in offending, such as theft or robbery

Staff will be aware of these indicators and risk factors. If a member of staff has a concern about a pupil being involved in, or at risk of, serious violence, they will report this to the DSL.

SupaJam's uses this risk factor model for all students at SupaJam both over and under 18 years. SupaJam recognises that many of its students may be over 18 but have a lower cognitive age due to the SEND needs.

Checking the identity and suitability of visitors

All visitors will be required to verify their identity to the satisfaction of staff and to leave their belongings, including their mobile phone(s), in a safe place during their visit.

If the visitor is unknown to the setting, we will check their credentials and reason for visiting before allowing them to enter the setting. Visitors should be ready to produce identification.

Visitors are expected to sign into the visitors' system and wear a visitor's badge with the appropriate lanyard;

Yellow - Can be unsupervised

Red - Must be supervised at all times

Visitors to SupaJam who are visiting for a professional purpose, such as educational psychologists and school improvement officers, will be asked to show photo ID and:

- Will be asked to show their DBS certificate, which will be checked alongside their photo ID; or

- The organisation sending the professional, such as the LA or educational psychology service, will provide prior written confirmation that an appropriate level of DBS check has been carried out (if this is provided, we will not ask to see the DBS certificate)

All other visitors, including visiting speakers, will be accompanied by a member of staff at all times. We will not invite into the school any speaker who is known to disseminate extremist views, and will carry out appropriate checks to ensure that any individual or organisation using school facilities is not seeking to disseminate extremist views or radicalise pupils or staff.

Appendix 5

Local Contacts For Referrals

All members of staff in SupaJam are made aware of local support available.

Gateway to to the Kent integrated Children's services Portal (Front Door)

<https://webapps.kent.gov.uk/KCC.ChildrensPortal.Web.Sites.Public/Default.aspx>

KCC Safeguarding Adults

https://kentcc-self.achieveservice.com/en/AchieveForms/?form_uri=sandbox-publish://AF-Process-7467f146-20ac-4fd3-ad8e-879f9d590cfb/AF-Stage-e61ce820-d057-4f3f-8ff9-486a7fff2afb/definition.json&redirectlink=%2Fen&cancelRedirectLink=%2Fen&consentMessage=yes

social.services@kent.gov.uk

03000 41 61 61

Outside of hours emergency number: 03000 41 91 91

Brighton and Hove Front Door

<https://www.brighton-hove.gov.uk/families-children-and-learning/refer-child-or-family-front-door-families>

FrontDoorforFamilies@brighton-hove.gov.uk

01273 290 400

Brighton and Hove Safeguarding Adults

Access Point: 01273 29 55 55

hascsafeguardinghub@brighton-hove.gov.uk

Area Safeguarding Advisor 16-18 years

www.theeducationpeople.org

Online Safety in the Education Service

Tel 03000 415797

esafetyofficer@theeducationpeople.org

KENT LESAS (Previously the LADO)

All referrals to the LESAS should be made via the Kent Integrated Children's Portal

<https://kccchildrens.kent.gov.uk/web/portal/pages/home>

If you are unsure as to whether a concern meets the threshold for a referral you can seek advice through the LESAS enquiry [form](#).

Brighton and Hove LADO

For urgent LADO matters outside of office hours, at weekends and on public holidays contact 01273 335905.

Kent Police and Brighton and Hove Police

101 or 999 if there is an immediate risk of harm

Kent Safeguarding Children Multi Agency Partnership (KSCMP)

Tel 03000 421126

Email kscmp@kent.gov.uk

PREVENT KCC & Brighton and Hove

[Prevent National Referral Form](#)

Channel.Prevent@brighton-hove.gov.uk

SussexPrevent@thamesvalley.police.uk

Kent Education Officers

- Jill Allen (South & East Kent) jill.allen@kent.gov.uk
- Sally Green (Medway North & West Kent) sally.green2@kent.gov.uk Community Engagement Officer
- Georgia Dawson - Georgia.dawson@kent.gov.uk Channel Team
- Helene Morris, Dovetail Channel Supervisor dovetail@kent.gov.uk
- Lisa Coward & Courtne Carter, Dovetail Channel Coordinators dovetail@kent.gov.uk KCC Assistant Director Contest and Serious Organised Crime (SOC)
- Nick Wilkinson - nick.wilkinson@kent.gov.uk Kent and Medway Prevent Coordinator
- Jess Harman - jess.harman@kent.gov.uk Prevent Referrals • preventreferrals@kent.police.uk Education Officers

- Jill Allen (South & East Kent) jill.allen@kent.gov.uk
- Sally Green (Medway North & West Kent) sally.green2@kent.gov.uk Community

Engagement Officer

- Georgia Dawson - Georgia.dawson@kent.gov.uk Channel Team • Helene Morris, Dovetail

Channel Supervisor dovetail@kent.gov.uk

- Lisa Coward & Courtnie Carter, Dovetail Channel Coordinators dovetail@kent.gov.uk KCC

Assistant Director Contest and Serious Organised Crime (SOC)

- Nick Wilkinson - nick.wilkinson@kent.gov.uk Kent and Medway Prevent Coordinator • Jess Harman - jess.harman@kent.gov.uk Prevent Referrals