

Catch22 College Safeguarding Policy

Maidstone

Policy Owner:	Head of Safeguarding
Local accountable officer:	Senior Operations Manager and lead teacher
Queries to:	Head of Safeguarding
Date created:	August 2018
Date of last review:	September 2025
Date of next review:	September 2026
Catch22 group, entity, hub:	Catch22 College
4Policies level (all staff or managers only)	All college staff

This policy will be reviewed annually.

Catch22 reserves the right to amend this policy, following consultation, where appropriate.

Catch22’s approach to safeguarding all of our learners is founded in the nature of our relationships. We prioritise assessing and managing the needs of our learners and have a dynamic approach to identification, assessment and response to risk.

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Important contacts

Senior Operations Manager	Roma Ferreria Roma.ferreria@catch-22.org.uk
Designated Safeguarding Lead (DSL)	Nazlihan Massey Nazlihan.massey@catch-22.org.uk Lorraine Butler Lorraine.butler@catch-22.org.uk Stacey Leggett Stacey.leggett@catch-22.org.uk
Deputy Designated Safeguarding Lead (Deputy DSL)	Sally-Ann Taylor Sally-Ann@catch-22.org.uk
Head of Operations	Ryan Weaver Ryan.Weaver@Catch-22.org.uk
Catch22 Head of Safeguarding	Graham Vagg Graham.vagg@catch-22.org.uk
Safegaurding & SEND Lead	Sally-Ann Taylor Sally-Ann.Taylor@Catch-22.org.uk
Multi Agency Safeguarding Help (MASH)	Worried about a child - Kent Safeguarding Children Multi-Agency Partnership 03000419191

Early Help	03000411111 Earlyhelp@kent.gov.uk
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Local Authority Designated Officer (LADO)	Email: lesasenquiries@kent.gov.uk Phone: 03000 41 11 11 (for urgent concerns) or 03000 41 91 91 (for outside office hours)

Local Safeguarding

- **Kent Safeguarding Children Multi-Agency Partnership:**
- [Phone: 03000 419191 \(24-hour emergency number\).](tel:03000419191)

- **Medway Safeguarding Children Partnership:**
- [Phone: 01634 334466 \(Monday to Friday: 9am to 5pm\).](tel:01634334466)
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- **Kent County Council:**
- [For reporting concerns about children, you can contact them through their official website.](#)

- **Local Authority Designated Officers (LADO):**
- [Email: lesasenquiries@kent.gov.uk](mailto:lesasenquiries@kent.gov.uk)

Partnership (LSP)

Local Adult Safeguarding Board	Adult safeguarding for professionals - Kent County Council

DFE dedicated helpline extremism	counter-extremism@education.gov.uk 020 7340 7264

1. Introduction

Catch22 College is the collective name we give to our sites across the country where we provide learning programmes to young people aged between 14 and 19, or up to 25 where they have an Education, Health and Care Plan (EHCP).

We specialise in providing learning and training opportunities for students who, for whatever reason, don't want to stay in a traditional ('mainstream') academic environment. We provide our students with a different option – the opportunity to carry on their learning in a smaller, highly supporting environment where the focus is on providing learning and vocationally focused training options to help them to gain skills, qualifications and experiences that will help them to achieve their goals in life. In most of our sites we also support local schools to expand their curriculum offer to their pre-16 student, or we have pre-16 students who are classified as Electively Home Educated, and therefore entitled to participate in our post-16 offer.

Catch22 is committed to providing promoting the health and wellbeing of all of our students and making sure that we do everything we can to keep them safe. The same is true in respect of staff and volunteers, and of any partner agencies that work with us to support our students. This policy sets out how we will fulfil this commitment.

2. Catch22 College safeguarding aims

Catch22 aims to ensure that:

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

3. Legislation and statutory guidance

This policy is based on the Department for Education's statutory guidance [Keeping Children Safe in Education \(2025\)](#) and [Working Together to Safeguard Children \(2023\)](#). We comply with this guidance

and the arrangements agreed and published by our 3 local safeguarding partners and the local adult safeguarding board.

This policy is also based on the following legislation:

[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 colleges duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism

The Disqualification Regulations”) and [Childcare Act 2006](#), which set out who is disqualified from working with children

The Care Act 2014 <http://www.legislation.gov.uk/ukpga/2014/23/contents/enacted> which outlines the duties and powers of the local authority for adult safeguarding.

4. Definitions

<p>Safeguarding and promoting the welfare of young people...</p>	<p>means:</p> <ul style="list-style-type: none"> • Protecting from maltreatment • Preventing the impairment of health and development • Ensuring that young people grow up in circumstances consistent with the provision of safe and effective care. • Taking action to enable all young people to have the best outcomes, or • protecting young people who may be in vulnerable circumstances. <p>Young people may be at risk of abuse or neglect due to the actions (or inaction) of another person or professional, or other staff working with them within and institution.</p>
<p>Child protection...</p>	<p>refers to activities undertaken to prevent children suffering, or being likely to suffer, significant harm.</p>
<p>Abuse...</p>	<p>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.</p>

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.
Child...	includes everyone under the age of 18 and staff must follow the procedures for children. (until their 18 th birthday)
Adult...	is anyone over the age of 18 and staff must follow the procedures for adults.

5. Equality statement

Some students have an increased risk of abuse, and additional barriers can exist for some students with respect to recognising or disclosing it. We are committed to anti-discriminatory practice and recognise student's diverse circumstances. We ensure that all children have the same protection, regardless of any barriers they may face.

We give special consideration to students who:

Have special educational needs (SEN) or disabilities

Are young carers

May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality

Have English as an additional language

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 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

6. Roles and responsibilities

Safeguarding and child protection is **everyone's** responsibility. This policy applies to all staff and volunteers of the College.

6.1 All staff

All staff will read and understand part 1, part 5 and annex B of the Department for Education's statutory safeguarding guidance, [Keeping Children Safe in Education](#), and review this guidance at least annually.

All staff will sign a declaration through 4 policies at the beginning of each academic year to say that they have reviewed the guidance.

All staff will be aware of:

- Our systems which support safeguarding, including this safeguarding policy, the staff code of conduct, the role and identity of the designated safeguarding lead (DSL) and deputies.
- The early help 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 adult 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 student 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 and neglect, as well as specific safeguarding issues, such as child on child abuse, child sexual exploitation (CSE), child criminal exploitation (CCE), indicators of being at risk from or involved with serious violent crime, FGM and radicalisation, self-neglect, financial abuse.
- The importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe

6.2 The designated safeguarding lead (DSL)

Our DSL is Nazlihan Massey, Lorraine Butler, Rowena Wellspring, Stacey Leggett

The DSL takes lead responsibility for child protection and wider safeguarding. During term time, the DSL will be available during College opening hours for staff to discuss any safeguarding concerns.

Our Deputy DSL is *****. When our DSL is absent, our Deputy DSL will act as cover.

If the DSL and deputy are not available, then you should contact your SOM Roma Ferrerio.

6.3 Governance

The Catch22 Safeguarding Board has responsibility for oversight and management of this policy.

Catch22's strong focus on governance means that all matters relating to safeguarding are overseen by the Safeguarding Board, which is comprised of designated Safeguarding Leads from each business area.

Alongside reviewing and monitoring safeguarding incidents through our safeguarding performance framework and organisational lessons learnt, the Safeguarding Board is the formal mechanism by which Catch22 disseminates safeguarding roles and responsibilities to staff as well as setting the strategic direction for safeguarding within its services. This group ensures effective communication between the managers and corporate departments and acts as the leadership group on safeguarding issues by:

- providing up to date knowledge on safeguarding matters
- ensuring that staff have access to appropriate safeguarding training

- reviewing how the safeguarding policies are working in practice.

6.4 An overview of organisational safeguarding structure

The **Chief Executive of Catch22** holds ultimate accountability for ensuring safeguarding arrangements, as delegated to this role by the **Board of Trustees**. As a registered charity, Catch22 has a **Safeguarding Trustee** on the Board of Trustees. The Board of Trustees has specific responsibilities in working with in line with the Charity Commission that can be found here <https://www.gov.uk/government/publications/safeguarding-children-and-young-people/safeguarding-children-and-young-people>.

Catch22 has an organisational Head of Safeguarding, who is an experienced and qualified safeguarding practitioner to ensure that safeguarding matters are central to the strategic management of Catch22.

6.5 The Senior Operations Manager

The regional manager is responsible for the implementation of this policy, including:

- Ensuring that staff (including temporary staff) and volunteers are informed of this policy as part of their induction
- Communicating this policy to parents when the young person joins the centre and via the centre website
- Ensuring that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent
- Ensuring that all staff undertake appropriate safeguarding and child and adult protection training and update this regularly
- Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate.

In most instances, the lead teacher will also be the Designated Safeguarding Lead for the Centre..

7. Confidentiality

The college will:

- Ensure confidentiality protocols are adhered to and information is shared appropriately. If in any doubt about confidentiality, staff will seek advice from a senior manager or Social Care Worker as required.
- The college follows the 'Information sharing: Guidance for practitioners and managers' <https://www.gov.uk/government/publications/safeguarding-practitioners-information-sharing>

[advice?utm_source=c891c883-79a7-4e30-bfaf-0dbde1b003eb&utm_medium=email&utm_campaign=govuk-notifications&utm_content=immediate](https://www.gov.uk/guidance/advise?utm_source=c891c883-79a7-4e30-bfaf-0dbde1b003eb&utm_medium=email&utm_campaign=govuk-notifications&utm_content=immediate)

- Ensure that the Designated Safeguarding Lead will only disclose any information about a student to other members of staff on a 'need to know' basis.
- Make all staff aware that they have a professional responsibility to share information with other agencies in order to safeguard students
- Ensure staff are clear with students that they cannot promise to keep secrets.
- Timely information sharing is essential to effective safeguarding
- Information must be shared on a 'need-to-know' basis, but you do not need consent to share information if a student is suffering, or at risk of, serious harm
- Confidentiality is also addressed in this policy with respect to record-keeping in section
- Further information on data protection can be found in Data Management and Protection policy.

8. Recognising abuse and taking action- Children

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 DSL (or deputy DSL)”.

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

Make a referral to children’s social care and/or the police **immediately** if you believe a child is suffering or likely to suffer from harm, or 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.

Referrals will be made in line with local procedures.

8.2 If a child makes a disclosure to you

If a child discloses a safeguarding issue to you, you should (NSPCC what to say to a child and how to respond):

- › **Listen carefully to what they are saying.** Be patient and focus on what you are being told. Try not to express your own views and feelings. Allow them time to talk freely and do not ask leading questions.
- › **Stay calm and do not show that you are shocked or upset.** If you appear shocked or as you do not believe them it could make them stop talking and take back what they have said.
- › **Let them know they have done the right thing in telling you.** Reassurance can be a big impact. If they have kept the abuse a secret it can have a big impact knowing they have shared what has happened.
- › **Tell them it is not their fault and they have done the right thing telling you.** Abuse is never a child’s fault. It is important they hear, and know this.
- › **Explain what will happen next and that you will have to pass this information on.** Do not promise to keep it a secret
- › **If you consider the child to be at immediate risk of harm, tell the DSL or deputy DSL straight away.**

- › **Write up your conversation as soon as possible on CPOMS in the child's own words.** Stick to the facts, and do not put your own judgement on it. Alert the DSL and deputy DSL's once entered on cpoms.
- › **Alternatively, if appropriate, make a referral to 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.

8.3 If you discover that FGM has taken place, or a pupil is at risk of FGM

The Department for Education's 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 pupil has already been subjected to FGM, and factors that suggest a student may be at risk, are set out in appendix 4.

Any teacher who discovers (either through disclosure by the victim or visual evidence) that an act of FGM appears to have been carried out on a **student under 18**, must immediately report this to the police, personally. This is a statutory duty, and teachers 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 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 **pupil under 18** must speak to the DSL and follow our local safeguarding procedures.

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

Any member of staff who suspects a pupil is *at risk* of FGM or suspects that FGM has been carried out, must speak to the DSL and report their concerns using CPOMS.

8.4 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)

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 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 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 as soon as possible.

Early help

If early help 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.

The DSL will keep the case under constant review and the college 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.

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 (see section 7.1), you must tell the DSL as soon as possible.

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.

8.5 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 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 [Channel](#), the government's programme for identifying and supporting individuals at risk of being drawn into terrorism, or the local authority children's social care team.

The Department for Education also has a dedicated telephone helpline, 020 7340 7264, which college staff can call to raise concerns about extremism with respect to a pupil. 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

8.6 If you have a mental health concern

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.

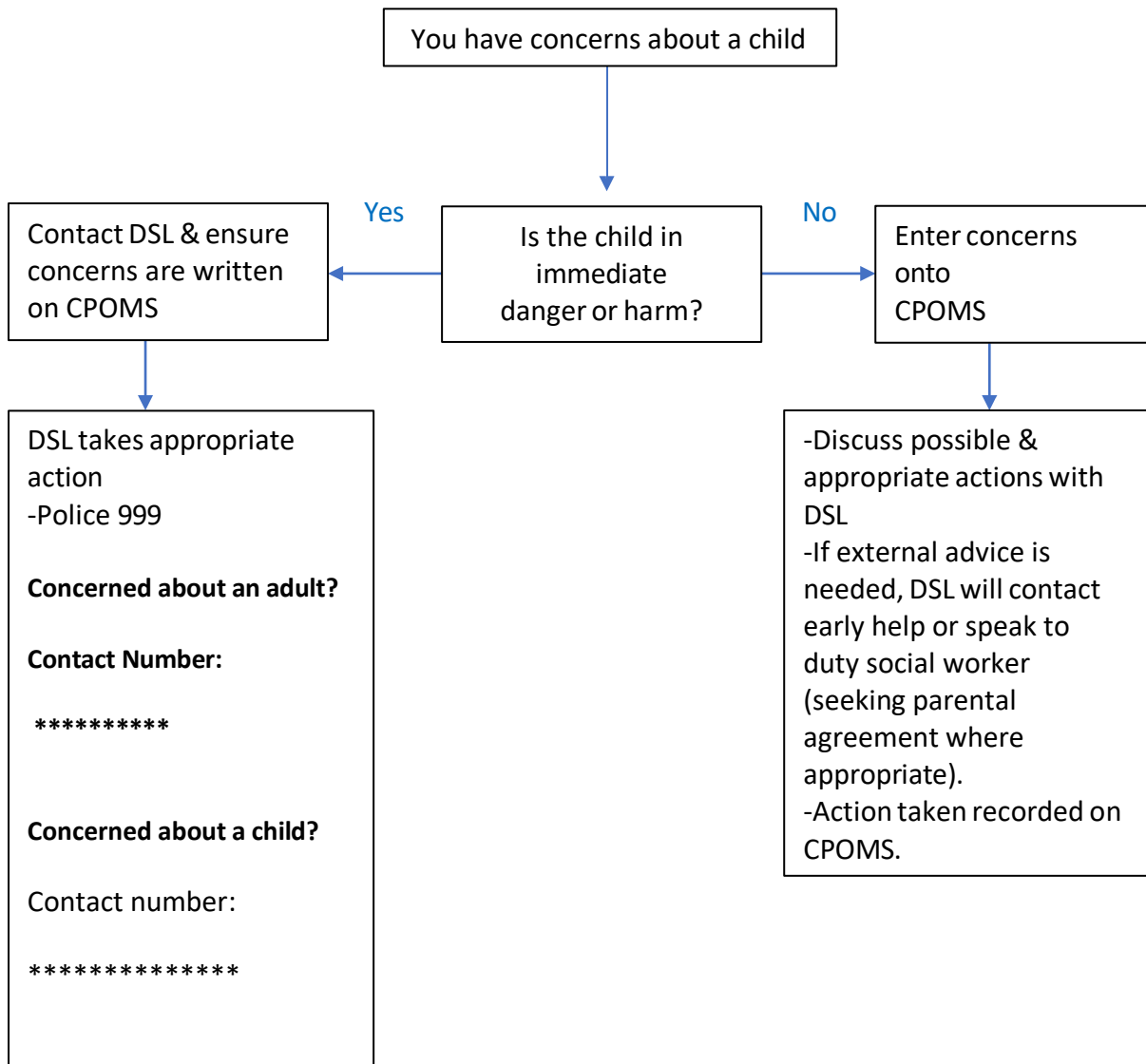
Staff will be alert to behavioural signs that suggest a child may be experiencing a mental health problem or be at risk of developing one.

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.)



9. Recognising abuse and taking actions- Adults

The Care Act 2014 sets out clear legal framework for how local authorities and other parts of health and care systems should protect adults at risk of abuse or neglect.

Adult safeguarding arrangements are about:

Empowerment:	Presumption of person-led decisions and informed consent.
Protection:	Support and representation for those in greatest need.
Prevention:	It is better to take action before harm occurs.
Proportionality:	Proportionate and least intrusive response appropriate to the risk presented.
Partnership:	Local solutions through services working with their communities have a part to play in preventing, detecting and reporting neglect and abuse.
Accountability:	Accountability and transparency in delivering safeguarding.

An adults' ability to give consent is important when safeguarding and protecting adults at risk. The Mental Capacity act 2005 provides a legal framework for making significant life decisions for adults who lack capacity to make decisions.

When working with adults at risk, a balance is needed between the interventions to protect them, and their right to live their lives without unwarranted or excessive interference, and to exercise autonomy and self-determination.

9.1 Adult abuse and raising a concern

Abuse is mistreatment by any other person or persons that violates a person's human and civil rights. The abuse can vary from treating someone with disrespect in a way which significantly affects the person's quality of life, to causing actual physical suffering.

Abuse can happen anywhere - in a residential home, a hospital, in the workplace, at a day centre or educational establishment, in supported housing or in the street.

Appendix 2 defines the forms of adult abuse.

If you are concerned an adult is being abused a referral will be made to adult social care duty team. If the adult's immediate safety is at risk call 999 straight away.

10. Concerns about a staff member, supply teacher or volunteer

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 follow guidance in Managing Allegations Policy and Low Level Concerns Policy.

Any concern regarding a member of staff will be escalated to the Catch22 Head of Safeguarding and People Partner.

11. 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”.

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 our college’s learner handbook, 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 students in the college at risk
- Is violent
- Involves students 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 students involved (including the victim(s), the student(s) against whom the allegation has been made and any others affected) with a named person they can talk to if needed

Creating a supportive environment in college 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, we 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 students are able to easily and confidently report abuse using our reporting systems

Ensure staff reassure victims that they are being taken seriously

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 college, 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 student’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:

- Students 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 student’s behaviour might indicate that something is wrong

That certain students may face additional barriers to telling someone because of their vulnerability, disability, gender, ethnicity and/or sexual orientation

That a student 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 peer-on-peer abuse and responding where they believe a student may be at risk from it

That they should speak to the DSL if they have any concerns

11.1 Sharing of nudes and semi-nudes (‘sexting’)

Your 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 (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 student 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 student to delete it

Ask the student(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 student(s) it involves or their, or other, parents and/or carers

Say or do anything to blame or shame any students involved

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

12. Reporting systems for our students

Where there is a safeguarding concern, we will take the student'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 students to confidently report abuse

Ensure our reporting systems are well promoted, easily understood and easily accessible for students

Make it clear to students that their concerns will be taken seriously, and that they can safely express their views and give feedback

Students can report concerns directly to college staff

Students are reminded how to report concerns through posters around the college site

13. How students are taught about safeguarding

Students are taught about safeguarding through the following;

- Personal, social and health education (PSHE) curriculum
- Relationship sex education (RSE) curriculum
- Votes for schools

All students receive an induction, and as part of their induction the DSL and Deputy DSL's are identified to them.

Students are taught how to keep themselves safe online and this is outlined in the E-Safety policy.

14. The students wishes

Where there is a safeguarding concern the DSL will ensure the students wishes and feelings are taken into account when determining what action to take and services to provide. Following a disclosure the DSL will discuss with the student and give them an opportunity to express their views. The student will always be told of next steps following any disclosure. The DSL will always operate with the best interest of the student at their heart.

15. Notifying parents

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

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

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

16. Online Learning

If online learning has to continue or be reinstated at any point, communication will only be through;

- College email
- Learning resources available online, included pre-recorded sessions

The following will be adhered to;

- No personal contact information will be shared with parents and carers or students.
- Microsoft TEAMS (using the whiteboards app or Powerpoint presentations which can be shared through screen share, not just with the teacher's face) will be the only platform used for live taught learning sessions.
- A timetable will be published of when lessons will be taught.
- At the start of every live lesson, students will be informed that the lesson is being recorded and their consent gained to continue participation in this session.
- Students will be reminded that they should also be in an appropriate place to take part in the lesson, not in their bedrooms and their clothing should be appropriate.
- Live lessons will be in groups only, there will be no 1:1 lessons.
- The background will need to be blurred and staff should be in professional dress.

17. Online Safety and Mobile Phones

We recognise the importance of safeguarding students 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, our college aims to:

- Have robust processes 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 **DSL must have an understanding** of filtering and monitoring to support decision-making and safeguarding responses.

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, anti-Semitism, 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; and
- **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 are a witness rather than a victim

Train staff on online safeguarding issues including cyber-bullying and the risks of online radicalisation. All staff members will receive refresher training at least once each academic year.

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:

- Staff are allowed to bring their personal phones to college for their own use, but will limit such use to non-contact time when students are not present
- Staff will not take pictures or recordings of students on their personal phones or cameras

Put in place robust filtering and monitoring systems to limit students exposure to the 4 key categories of risk (described above) from the college's IT systems

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.

Catch22 recognises that AI has many uses, including enhancing teaching and learning, and in helping to protect and safeguard pupils. 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.

Catch22 Colleges will treat any use of AI to access harmful content or bully pupils in line with this policy and our anti-bullying/behaviour 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 school.

18. Complaints and concerns about college safeguarding policies

18.1 Complaints against staff

Complaints against staff that are likely to require a child protection investigation will be handled in accordance with our procedures for dealing with Managing allegations against staff within the policy.

18.2 Other complaints

For further information read the Catch22 complaints policy.

18.3 Whistle-blowing

A separate Catch22 Whistle-blowing policy outlines the procedures for reporting a concern, how the college will respond and the protection available for staff who report another member of staff.

For further information read the Catch22 whistle-blowing policy.

Other contacts you may use;

- NSPCC number 0808 800 5000
- I have a concern email ihaveaconcern@catch-22.org.uk

19. Record-keeping

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

All safeguarding concerns, discussions, decisions made and the reasons for those decisions, must be recorded in writing using CPOMS. If you are in any doubt about whether to record something, discuss it with the DSL. Appendix 4 provides guidance on how to enter incidents onto CPOMS.

Non-confidential records will be easily 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.

Safeguarding records relating to individual children will be retained until their 23rd birthday.

Safeguarding records which contain information about allegations of sexual abuse will be retained for the Independent Inquiry into Child Sexual Abuse (IICSA), for the term of the inquiry.

The college shares information with other agencies and when this is appropriate, in line with local safeguarding procedures.

Appendix 3 sets out our policy on record-keeping specifically with respect to recruitment and pre-employment checks

20. 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 the visitors' book and wear a visitor's badge. Visitors will be issued with safeguarding information and told who the DSL is on site.

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 college facilities is not seeking to disseminate extremist views or radicalise students or staff.

21. Training

21.1 All staff

All staff members will undertake safeguarding and child protection training at induction and annually, including on whistle-blowing procedures, to ensure they understand the college's safeguarding systems and their responsibilities, and can identify signs of possible abuse or neglect.

All staff will have training on the government's anti-radicalisation strategy, Prevent, to enable them to identify students at risk of being drawn into terrorism and to challenge extremist ideas.

21.2 The DSL and deputies

The DSL and deputies will undertake child protection and safeguarding training at least every 2 years.

In addition, they will update their knowledge and skills at regular intervals and at least annually (for example, through e-bulletins, meeting other DSLs, or taking time to read and digest safeguarding developments).

They will also undertake Prevent awareness training.

21.3 Recruitment – interview panels

At least one person conducting any interview for a post at the college will have undertaken safer recruitment training. This will cover, as a minimum, the contents of the Department for Education's statutory guidance, Keeping Children Safe in Education, and will be in line with local safeguarding procedures. For further information please see our Recruitment and Selection policy.

22. Monitoring arrangements

This policy will be reviewed **annually** by the Head of Safeguarding. At every review, it will be approved by the Safeguarding board.

23. Links with other policies

This policy links to the following policies and procedures:

Learner handbook

Staff code of conduct

Complaints

Health and safety

Privacy notices

Whistle Blowing policy

Disclosure and Barring Service (DBS) checks policy

Recruitment and selection policy

Data Management and Protection policy

Managing Allegation Policy

Low Level Concerns Policy

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 one 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 cyberbullying), 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

It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Appendix 2: Adult abuse

Forms of abuse include (as defined in the Care Act 2014):

Physical abuse...	including hitting, slapping, and pushing, kicking, misuse of medication, restraint, or inappropriate sanctions
Domestic violence	including psychological, physical, sexual, financial, emotional abuse and honour based violence
Sexual abuse	including rape and sexual assault or sexual acts to which the adult at risk has not consented, or is incapable of giving informed consent or was pressured into consenting. This may involve contact or non-contact abuse (e.g. touch, masturbation, being photographed, teasing, and inappropriate touching)
Psychological abuse...	including emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, isolation or withdrawal from services or supportive networks
Financial or material abuse	including theft, fraud, exploitation, pressure in connection with wills, property or inheritance or financial transactions, or the misuse or misappropriation of property, possessions or benefits
Modern slavery...	encompasses slavery, human trafficking; forced labour and domestic servitude. Traffickers and slave masters use whatever means they have at their disposal to coerce, deceive and force individuals into a life of abuse, servitude and inhumane treatment.
Discriminatory abuse...	including racist, sexist, that based on a person's disability, culture and other forms of harassment, slurs or similar treatment
Organisational abuse...	(previously known as institutional abuse) Neglect and poor professional practice in care settings also need to be taken into account. It may take the form of isolated incidents of poor practice at one end of the spectrum, through to pervasive ill treatment or gross misconduct at the other. It can occur when the routines, systems, communications and norms of an institution compel individuals to sacrifice their preferred lifestyle and cultural diversity to the needs of that institution. Repeated instances of poor care may be an indication of more serious problems

Neglect and acts of omission...	including ignoring medical or physical care needs, failure to provide access to appropriate health, social care or educational services, and the withholding of the necessities of life, such as medication, adequate nutrition and heating
Self-neglect	Which covers a wide range of behaviours such as neglecting to care for one's personal hygiene, health or surroundings and includes behaviour such as hoarding

Any of these forms of abuse can be either deliberate or be the result of ignorance, or lack of training, knowledge or understanding. Often if a person is being abused in one way they are also being abused in other ways.

Appendix 3: safer recruitment and DBS checks – policy and procedures

We will record all information on the checks carried out in the college's single central record (SCR). Copies of these checks, where appropriate, will be held in individuals' personnel files. We follow requirements and best practice in retaining copies of these checks, as set out below.

Advertising

When advertising roles, we will make clear:

- Our college's commitment to safeguarding and promoting the welfare of children
- That safeguarding checks will be undertaken
- The safeguarding requirements and responsibilities of the role, such as the extent to which the role will involve contact with children
- Whether or not the role is exempt from the Rehabilitation of Offenders Act 1974 and the amendments to the Exceptions Order 1975, 2013 and 2020. If the role is exempt, certain spent convictions and cautions are 'protected', so they do not need to be disclosed, and if they are disclosed, we cannot take them into account

Pre-appointment of new staff

When appointing new staff, we will:

Verify their identity

Obtain (via the applicant) an enhanced DBS certificate, including barred list information for those who will be engaging in regulated activity. We will obtain the certificate before, or as soon as practicable after, appointment, including when using the DBS update service. We will not keep a copy of the certificate for longer than 6 months, but when the copy is destroyed we may still keep a record of the fact that vetting took place, the result of the check and recruitment decision taken

Ensure they are registered on the DBS update service.

Obtain a separate barred list check if they will start work in regulated activity before the DBS certificate is available

Verify their mental and physical fitness to carry out their work responsibilities

Verify their right to work in the UK. We will keep a copy of this verification for the duration of the member of staff's employment and for 2 years afterwards

Verify their professional qualifications, as appropriate

Ensure they are not subject to a prohibition order if they are employed to be a teacher

Carry out further additional checks, as appropriate, on candidates who have lived or worked outside of the UK. Where available, these will include:

- For all staff, including teaching positions: [criminal records checks for overseas applicants](#)
- For teaching positions: obtaining a letter of professional standing from the professional regulating authority in the country where the applicant has worked

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

We will ask for written information about previous employment history and check that information is not contradictory or incomplete.

We will seek references on all short-listed candidates, including internal candidates, before interview. We will scrutinise these and resolve any concerns before confirming appointments. The references requested will ask specific questions about the suitability of the applicant to work with children.

Regulated activity means a person who will be:

Responsible, on a regular basis in a school or college, for teaching, training, instructing, caring for or supervising children; or

Carrying out paid, or unsupervised unpaid, work regularly in a school or college where that work provides an opportunity for contact with children; or

Engaging in intimate or personal care or overnight activity, even if this happens only once and regardless of whether they are supervised or not

Existing staff

All staff will be registered on the DBS update service. These will be checked twice a year by Catch22 People Team to ensure there are no changes to their certificates and staff remain registered on the update service.

If we have concerns about an existing member of staff's suitability to work with children, we will carry out all the relevant checks as if the individual was a new member of staff. We will also do this if an individual moves from a post that is not regulated activity to one that is.

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

The individual has received a caution or conviction for a relevant offence, or there is reason to believe the individual has committed a listed relevant offence, under the [Safeguarding Vulnerable Groups Act 2006 \(Prescribed Criteria and Miscellaneous Provisions\) Regulations 2009](#); or

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

All staff are expected to maintain their subscription with the DBS update service. Checks on the update service will be completed every October and March.

Agency and third-party staff

We will obtain written notification from any agency or third-party organisation that it has carried out the necessary safer recruitment checks that we would otherwise perform, if these checks have not been completed we will not allow that individual to work in our college. We will also check that the person presenting themselves for work is the same person on whom the checks have been made.

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 the school.

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

Obtain references for the volunteer

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

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.

We will also consider whether it is necessary for barred list checks to be carried out on the individuals who supervise a pupil under 16 on work experience. This will depend on the specific circumstances of the work experience, including the nature of the supervision, the frequency of the activity being supervised, and whether the work is regulated activity.

Appendix 4: Specific safeguarding issues children

This appendix is based on the advice in annex B of Keeping Children Safe in Education and local safeguarding procedures. The college works with external agencies when it recognises a student is at risk and requires additional support to prevent any harm occurring.

Contextual safeguarding

Contextual safeguarding is an approach to practice and system design. It seeks to create a response to extra familial forms of abuse that can:

- Target the contexts in which that abuse occurs, from assessment through to intervention
- Framework to address extra-familial risk through the lens of child welfare, as opposed to crime reduction or community safety
- Utilise partnerships between children's services and agencies who have a reach into extra-familial contexts (such as transport providers, retailers, youth workers, residents' associations, parks and recreation services, schools and so on), and;
- Measure success with reference to the nature of the context in which harm has been occurring, rather than solely focusing on any behaviour changes displayed by young people who were at risk in those contexts.

Work to develop contextual safeguarding, happens in two tiers. The first tier involves acknowledging context more explicitly in all work with children and families. This could include talking with parents about the context in which they are trying to parent their child, and engaging young people in activities where they can explore their feelings of safety in public, as well as private, spaces.

At the second tier, work is undertaken to create resources and approaches for assessing and intervening with peer groups, schools and public spaces identified as ones in which young people have experienced abuse. This ranges from thinking about how to conduct observations in neighbourhoods, as one might already do of a home during a visit, through to creating processes to refer contexts into safeguarding hubs, as one might already do for families, and holding context conferences, in place of child protection conferences, to build plans for contexts that have been assessed.

At Tier 2, therefore, we not only recognise the contexts in which young people might experience harm but work actively to address them

Further information can be found here <https://contextualsafeguarding.org.uk/>

Children missing from education

A child going missing 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 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 go missing from education, particularly on repeat occasions, to help identify the risk of abuse 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 missing, 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, in 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, in 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 CSE 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.

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 and child/adolescent to parent violence and abuse. 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.

Older children may also experience domestic abuse and/or violence in their own personal relationships.

Exposure to domestic abuse and/or violence can have a serious, long-lasting emotional and psychological impact on children.

If police are called to an incident of domestic abuse and any children in the household have experienced the incident, the police will inform the key adult in school (usually the designated safeguarding lead) before the child or children arrive at school the following day.

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 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 children's social care.

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 pupil is at risk of FGM.

Indicators that FGM has already occurred include:

- A pupil confiding in a professional that FGM has taken place
- A mother/family member disclosing that FGM has been carried out
- A family/pupil 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 pupil 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 a 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 one 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.

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

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

The DSL will:

- Speak to the pupil 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 pupil to an education welfare officer, pastoral tutor, learning mentor, or school counsellor, as appropriate

Preventing radicalisation

Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups

Extremism is vocal or active opposition to fundamental British values, such as democracy, the rule of law, individual liberty, and mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces

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 have a duty to prevent children from being drawn into terrorism. The DSL will undertake Prevent awareness training and make sure that staff have access to appropriate training to equip them to identify children at risk.

We will assess the risk of children in our school being drawn into 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 pupils to stay safe online at school and at home.

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

Staff will be alert to changes in pupils' 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 Twitter
- Possessing extremist literature
- Being in contact with extremist recruiters and joining, or seeking to join, extremist organisations

Children 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 pupil, they will follow our procedures set out in section 7.5 of this policy, including discussing their concerns with the DSL.

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

Further information on the school's measures to prevent radicalisation are set out in other school policies and procedures.

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 and online.

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 peers

Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)

Sexual violence, such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence)

Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse

Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party

Consensual and non-consensual sharing of nudes and semi nudes images and/or videos (also known as sexting or youth produced sexual imagery)

Upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm

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 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.

Sexual violence and sexual harassment between children in schools

Sexual violence and sexual harassment can occur:

Between 2 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 sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

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 school

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.

Missing Students

Our procedures are designed to ensure that a missing child is found and returned to effective supervision as soon as possible. If a student goes missing/ absconds from site, we will notify their parents/ carers immediately, and/or their 'home school' if they are with us for only part of their educational delivery. If necessary, we will then report them missing to the police and keep parents/ carers updated throughout.

Appendix 5 CPOMS User Guide

If the student is at immediate harm, please inform the DSL. If the DSL is not on site inform the Deputy DSL.

CPOMS is our means of reporting any safeguarding concerns. It is vital that everyone follows the same procedures when using this system. Listed below are instructions for you so that you know what to do each time.

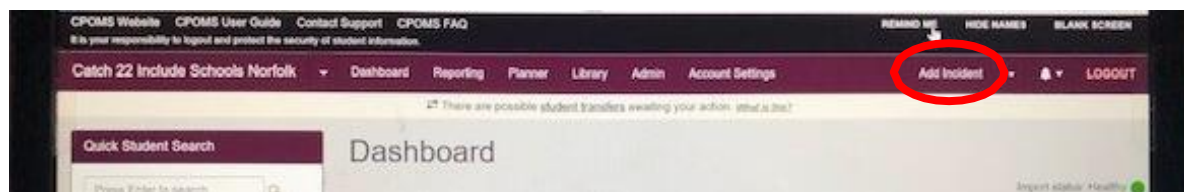
Please add the link to the main log in page <https://catch22college.cpoms.net/dash> to your favourites for ease of access.

Logging In:

Go to the main log in page (link above) and enter your email address and password.

Adding an Incident

Click on add incident.



Start typing the student's name in the 'Student' box. Then type in the details of the incident or concern in the box below. Please record facts, not opinions*. You might find using the following questions as prompts helpful.

- WHAT HAPPENED?
- WHERE DID IT HAPPEN?
- WHEN DID IT HAPPEN?
- WHO WAS PRESENT WHEN IT HAPPENED?
- HAS IT HAPPENED BEFORE?
- WHAT HAPPENED AFTERWARDS?
- WHAT HAPPENED BEFOREHAND?
- HAVE YOU TOLD ANYONE ELSE?

*IT IS OK TO STATE WHY YOU ARE CONCERNED BY THIS IN YOUR PROFESSIONAL OPINION

Use full names of staff and students when recording your incident.

Add Incident

Add Incident

Student

Start typing a student's name to log this incident against their record.

Incident

Categories
 Absconding Attendance Bullying Child Protection Criminal Behaviour Dangerous Behaviour Home issues LAC Mental Health
 Physical Injury Prevent Self-harm Sexual Exploitation Sexualised language/behaviour Substance Abuse

Linked Student(s)

Type a student's name to link them to this incident.

Date/Time

Alert Staff Members

After the incident has been typed, please select the category that you think is most relevant. You can select more than one.

Please ensure the date and time is accurate and represents when you were first made aware of the incident.

You may need to upload a file as part of the record. For example where a student may have written something that causes concern in a book and a photo is taken.

When you have completed all of the above click 'Add Incident'. Please ensure that you check over the report for any mistakes or inaccuracies as it cannot be deleted once saved.

Then type in names of staff to alert them to this incident.

Linked Student(s)

Type a student's name to link them to this incident.

Date/Time

Alert Staff Members

Type a colleague's name or select a user group to alert them to this incident. Colleagues highlighted in red would not normally be able to view this incident.

File(s)

Agency Involved
[Select Agencies](#)

CPOMS is completely secure –use full names when making reports. You can also access CPOMS from any internet connection (still secure).

Annex 1: Equality Impact Assessment

1. Summary

This EIA is for:	Catch22 College Safeguarding Policy
EIA completed by:	Head of Safeguarding
Date of assessment:	September 2025
Assessment approved by:	Catch22 College SLT

Catch22 is committed to always: avoiding the potential for unlawful discrimination, harassment and victimisation; advancing equality of opportunity between people who share a protected characteristic and those who do not; and, foster good relations between people who share a protected characteristic and those who do not.

An Equality Impact Assessment (EIA) is a tool for identifying whether or not strategies, projects, services, guidance, practices or policies have an adverse or positive impact on a particular group of people or equality group. Whilst currently only public bodies are legally required to complete EIA's under the Equality Act 2010, Catch22 has adopted the process in line with its commitment to continually improve our equality performance.

Policy owners are required to complete or review the assessment indicating whether the policy has a positive, neutral or negative impact for people who it applies to and who share one or more of the 9 protected characteristics under the Equality Act 2010.

Definitions are based on the Equality & Human Rights (EHRC) guidance.

Objectives and intended outcomes

This EIA has been completed in order to ensure that the implications and potential impact, positive and negative, of this policy have been fully considered and addressed, whether or not people share a protected characteristic.

2. Potential Impacts, positive and negative

Equality Area	Positive	Neutral	Negative	Please give details including any mitigation for negative impacts
Age Does this policy impact on any particular age groups or people of a certain age?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Disability Does this policy impact on people who have a physical or mental impairment which has a substantial and long-term adverse effect on that person's ability to carry out normal day to day activities?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Gender reassignment (transsexual, transgender, trans) Does this policy impact on people who are transitioning from one gender to another (at any stage)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Marriage and civil partnership Does this policy impact on people who are legally married or in a civil partnership?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Pregnancy and maternity (in work this is linked to maternity leave, non-work this is for 26 weeks after giving birth) Does this policy impact on people who are pregnant or in their maternity period following the birth of their child?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Race Does this policy impact on people as defined by their race, colour and nationality (including citizenship) ethnic or national origins	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	

<p>Religion and belief</p> <p>Does this policy impact on people who practice a particular religion or none, or who hold particular religious or philosophical, or political belief or none?</p>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
<p>Sex</p> <p>Does this policy impact on people because they are male or female?</p>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
<p>Sexual orientation</p> <p>Does this policy impact on people who are sexually attracted towards their own sex, the opposite sex or to both sexes?</p>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	

3. More information/notes