



RENDCOMB  
COLLEGE  
NURSERY • JUNIOR • SENIOR

# Safeguarding Children (Child Protection) Policy and Procedures

**(ISI: 7a)**

**Monitoring:**

DSL and DDSLs

**Reviewed by:**

Safeguarding  
Governors

**Reviewed:**

August 2022

**Next Review:**

August 2023 and  
also as issues  
arise and lessons  
are learned or  
when guidance  
changes.

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## Policy statement and principles.

Rendcomb College fully recognises its responsibilities for safeguarding children (child protection). This policy is made available via the Rendcomb College website, the parental handbook and on request. This policy is reviewed on an annual basis by Governors within the Education & Personnel Committee.

Our policy applies to the whole college including EYFS and to all staff (teaching and business support), Headmaster, Governors and volunteers in the college. The procedures are consistent with those of the Local Safeguarding Children's Partnership.

This policy was drawn up in accordance with the Department for Education guidance 'Keeping Children Safe in Education' September 2021, The Ofsted Review of Sexual Abuse in Schools and Colleges, and 'Working together to Safeguard Children' March 2015, the Education (Independent Schools Standards) (England) Regulations 2014.

## Our core safeguarding principles are:

- safeguarding is everyone's responsibility
- the college's responsibility to safeguard and promote the welfare of children is of paramount importance
- safer children make more successful learners
- policies will be reviewed at least annually unless an incident or new legislation or guidance suggests the need for an interim review.
- preventing impairment of children's mental and physical health or development;

## Policy aims

- To provide all staff with the necessary information to enable them to meet their child protection responsibilities
- To ensure consistent good practice
- To demonstrate the college's commitment regarding child protection to pupils, parents and other partners

### Terminology

**Safeguarding** and promoting the welfare of children refers to the process of protecting children from maltreatment, preventing the impairment of health or development, ensuring that children grow up in circumstances consistent with the provision of safe and effective care and taking action to enable all children to have the best outcomes.

**Child protection** refers to the processes undertaken to protect children who have been identified as suffering or being at risk of suffering significant harm.

**Staff** refers to all those working for or on behalf of the college, full time or part time, temporary or permanent, in either a paid or voluntary capacity.

**DSL** refers to the designated safeguarding lead at the college

**Child** includes everyone under the age of 18.

**Parent** refers to birth parents and other adults who are in a parenting role, for example step-parents, foster carers and adoptive parents.

## Safeguarding legislation and guidance

**The following safeguarding legislation and guidance has been considered when drafting this policy:**

- Section 157 of the Education Act 2002 (Independent Schools only, including academies and Free Schools)
- The Education (Independent Schools Standards) Regulations 2014 (Independent Schools only, including academies and Free Schools)
- The Safeguarding Vulnerable Groups Act 2006
- The Teacher Standards 2012
- Working Together to Safeguarding Children 2018
- Working Together: Transitional Guidance 2018
- Keeping Children Safe in Education 2022
- What to do if you're worried a child is being abused 2015
- The Ofsted Review of Sexual Abuse in Schools and Colleges 2021
- Prevent 2015 Guidance
- Relationship and Sex Education Statutory Guidance

## Roles and responsibilities

### Key personnel

**The designated safeguarding lead (DSL) for the whole college (including EYFS) child protection is:**

Jonnie Howorth

Contact details:

Email: [dhp@rendcombcollege.org.uk](mailto:dhp@rendcombcollege.org.uk)

Phone: 07801 273353 (mobile), 01285 832333 (office) or 01285 832338 (home)

The DSL is also the Mental Health Lead, the designated person in charge of looked after children and is responsible for early help.

### **The deputy designated leads are:**

Caroline Collett: email [collettc@rendcombcollege.org.uk](mailto:collettc@rendcombcollege.org.uk). (Senior Medical Sister)

Fiona Auster: email [austerf@rendcombcollege.org.uk](mailto:austerf@rendcombcollege.org.uk) (Junior School Assistant Head)

Marian James: email [jamesm@rendcombcollege.org.uk](mailto:jamesm@rendcombcollege.org.uk) (Head of PSHEE)

**In emergency if all Safeguarding staff are off ill, contact the most senior on-site member of staff available who will liaise with the LADO/Local Authority. Or staff are able to contact the LADO/LA themselves (contact numbers at bottom of this box)**

**The School Counsellor** is Amanda Fletcher and appointments can be booked through any of the above or the Medical Centre Sisters

**The Independent Listener** is Fiona Womersley who can be contacted on [fwomersley@aol.com](mailto:fwomersley@aol.com) or 07785 994373

**The Head Teacher** is Rob Jones

Contact details: Email is [headofcollege@rendcombcollege.org.uk](mailto:headofcollege@rendcombcollege.org.uk)

**The nominated child protection governors are:** Prue Hornby & Sara Arkle.

DoE Preventing extremism in schools and children's services: telephone 020 7340 7264  
[counter.extremism@education.gov.uk](mailto:counter.extremism@education.gov.uk)

**LADO** – Nigel Hatton 01452 426994

Local Authority Safeguarding contact numbers and emails

During Office Hours: Telephone: 01452 426565 (option 1) or [childrenshelpdesk@gloucestershire.gov.uk](mailto:childrenshelpdesk@gloucestershire.gov.uk)

## The Designated Safeguarding Lead (DSL):

The designated safeguarding lead (DSL) takes **lead responsibility** for safeguarding and child protection (including online safety) in the college. As Deputy Head (Pastoral) and a member of SLT, the DSL has the status and authority within the college to carry out the duties of the post, which include:

- ensuring the child protection policies are known, understood and used appropriately by staff, reviewed annually and publically available
- advising and supporting staff on child protection and safeguarding matters
- encouraging a culture of listening to children and ensuring that all policies and protocols are child-centric
- managing safeguarding referrals to children’s social care, the police, or other agencies
- taking part in strategy discussions and inter-agency meetings
- liaise with the mental health staff and support networks throughout the College
- liaising with the “case manager” and the designated officer(s) at the local authority where allegations are made against staff
- keep a clear and comprehensive summary of all concerns, details on how the concern was followed up and resolved and a note of any action taken, decisions reached and the outcomes.
- making staff aware of training courses and the latest local safeguarding arrangements available through the local safeguarding partner arrangements □ transferring the child protection file to a child’s new school.
- undergoing training and receiving regular updates to maintain the knowledge and skills required to carry out the role, including Prevent awareness training.
- Take a lead role in promoting educational outcomes by knowing the welfare, safeguarding and child protections issues that children in need are experiencing or have experienced.
- Ensure information is shared to ensure identification of all forms of abuse and neglect and promote children’s welfare, including their educational outcomes.
- Complete inter-agency Level 3 Safeguarding training every two years.
- Ensure that staff receive appropriate training updates at least annually
- Create and manage any risk assessments relating to safeguarding matters, including examining future safety of any onsite locataions
- Promote and create appropriate opportunities to teach pupils about safeguarding
- Lead reviews into lessons learnt from cases involving safeguarding matters
- Undertake other roles as stipulated in detail by Annexe C of KCSIE

## The deputy designated safeguarding lead(s):

Is/are trained to the same level as the DSL and supports the DSL with safeguarding matters as appropriate. In the absence of the DSL, the deputy DSL carries out those functions necessary to ensure the ongoing safety and protection of pupils. In the event of the longterm absence of the DSL, the deputy will assume the functions above.

## The safeguarding governors:

Are trained to the same level as the DSL and Deputy DSLs and are responsible for ensuring the Safeguarding team dispense their duties correctly. The Safeguarding governors will have termly meetings with the DSL, as well as regular phone calls and email communications regarding safeguarding practices (including boarding and EYFS). The DSL will keep the Safeguarding governors updated on pressing matters relating to the safeguarding of children in the College. They will also, in conjunction with the DSL, carry out a full Safeguarding review which is then presented to the whole governing body. This occurs at least once an academic year or more frequently as a result of lessons learnt from issues arising.

All Governors undertake the same level of Safeguarding training as all members of staff on an annual basis. There is a Governor of the Month visit (co-ordinated by the Bursar) where every Governor will meet pupils and staff to discuss any pressing matters.

## Covid-19 Pandemic

<https://www.gov.uk/government/publications/actions-for-schools-during-the-coronavirus-outbreak>

During the Covid-19 Pandemic there has been additional guidance offered to assist schools during this time. The link above offers guidance with regards to the latest Covid-19 requirements.

Additional information has been added to Annexe C of KCSIE 2020 which covers online working and keeping/storing of records. As schools and colleges increasingly work online, it is essential that children are safeguarded from potentially harmful and inappropriate online material. We continue to ensure appropriate filters and appropriate monitoring systems are in place.

As the pandemic continues we have pupils who will be remote learning during periods of enforced isolation due to Covid. These pupils have work set through Microsoft Teams and are monitored and liaised with by tutors.

Should the College be forced to return fully to remote learning, this will all be done via the Microsoft Teams platform to ensure safety and security of both staff and pupils during this time. Additional guidance would be sent out at such a time when a switch to full remote learning is required.

# Child protection procedures

## Abuse

### **Recognising abuse**

To ensure that our pupils are protected from harm, we need to understand what types of behaviour constitute abuse and neglect.

Abuse and neglect are forms of maltreatment. Somebody may abuse or neglect a child by inflicting harm, for example by hitting them, or by failing to act to prevent harm, for example by leaving a small child home alone, or leaving knives or matches within reach of an unattended toddler.

Abuse may be committed by adult men or women and by other children and young people (Teenage Relationship Abuse).

## Four categories of abuse

### **Physical abuse**

Physical abuse is a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Although they can be much less serious and violent and do not need to be such 'high level' actions to be considered physical abuse. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child. (This used to be called Munchausen's Syndrome by Proxy, but is now more usually referred to as fabricated or induced illness).

### **Emotional abuse**

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature 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. It may involve seeing or hearing the

illtreatment of another. It may involve serious bullying (including cyber bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

### **Sexual abuse**

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. They may also include 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**

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); or
- ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

## **Indicators of abuse**

Physical signs can indicate some types of abuse, for example, bruising, bleeding or broken bones resulting from physical or sexual abuse, or injuries sustained while a child has been inadequately supervised. The identification of physical signs is complicated, as children may go to great lengths to hide injuries, often because they are ashamed or embarrassed, or their abuser has threatened further violence or trauma if they 'tell'. It is also quite difficult for anyone without medical training to categorise injuries into accidental or deliberate with any degree of certainty. For these reasons it is vital that staff are also aware of the range of behavioural indicators of abuse and report any concerns to the designated senior person.

**It is the responsibility of staff to report their concerns. It is not their responsibility to investigate or decide whether a child has been abused.**

A child who is being abused, neglected or exploited may:

- have bruises, bleeding, burns, fractures or other injuries
- show signs of pain or discomfort
- keep arms and legs covered, even in warm weather
- be concerned about changing for PE or swimming
- look unkempt and uncared for
- change their eating habits
- have difficulty in making or sustaining friendships
- appear fearful
- be reckless with regard to their own or other's safety
- self-harm
- frequently miss school, arrive late or leave the school for part of the day
- show signs of not wanting to go home
- display a change in behaviour – from quiet to aggressive, or happy-go-lucky to withdrawn
- challenge authority
- become disinterested in their school work
- be constantly tired or preoccupied
- be wary of physical contact
- be involved in, or particularly knowledgeable about drugs or alcohol
- display sexual knowledge or behaviour beyond that normally expected for their age □  
acquire gifts such as money or a mobile phone from new 'friends'

Individual indicators will rarely, in isolation, provide conclusive evidence of abuse. They should be viewed as part of a jigsaw, and each small piece of information will help the DSL to decide how to proceed.

**It is very important that staff report their concerns – they do not need 'absolute proof' that the child is at risk.**

## Impact of abuse

The impact of child abuse, neglect and exploitation should not be underestimated. Many children do recover well and go on to lead healthy, happy and productive lives, although most adult survivors agree that the emotional scars remain, however well buried. For some children, full recovery is beyond their reach, and the rest of their childhood and their

adulthood may be characterised by anxiety or depression, self-harm, eating disorders, alcohol and substance misuse, unequal and destructive relationships and long-term medical or psychiatric difficulties.

## Taking action

**Any child, in any family in any school could become a victim of abuse. Staff should always maintain an attitude of “it could happen here”.** Key points for staff to remember for acting are:

- In an emergency take the action necessary to help the child (including calling 999)
- Report your concern as soon as possible to the DSL, definitely by the end of the day
- Do not start your own investigation
- Share information on a need-to-know basis only – do not discuss the issue with colleagues, friends or family
- Complete a record of concern using Myconcern.
- Seek support for yourself if you are distressed.

## Mental Health

All staff should also be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation and is therefore an immediate safeguarding concern. Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one. Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children’s experiences, can impact on their mental health, behaviour and education. If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following their child protection policy and speaking to the designated safeguarding lead or a deputy.

## Bullying

While bullying between children is not a separate category of abuse and neglect, it is a very serious issue that can cause considerable anxiety and distress. At its most serious level, bullying can have a disastrous effect on a child’s wellbeing and in very rare cases has been a feature in the suicide of some young people.

All incidences of bullying, including cyber-bullying and prejudice-based bullying should be reported and will be managed through our anti-bullying policy. All pupils and parents receive a copy of these procedures in the pupil handbook on joining the college and the subject of bullying is addressed at regular intervals in PSHEE education. If the bullying is particularly serious, or the anti-bullying procedures are deemed to be ineffective, the DSL will consider implementing child protection procedures.

## Cyber bullying

Cyberbullying may be defined as ‘the use of electronic communication, particularly mobile phones and the internet, to bully a person, typically by sending messages of an intimidating or threatening nature’. It can take a number of different forms: threats and intimidation, harassment or ‘cyber-stalking’ (e.g. repeatedly sending unwanted texts or instant messages), sexting (e.g. sending and receiving sexually explicit messages, primarily between mobile phones) vilification/defamation, exclusion/peer rejection, impersonation, unauthorised publication of private information/images and ‘trolling’ (abusing the internet to provoke or offend others online). It can be an extension of face-to-face bullying, with technology providing the bully with another route to harass their target.

## Child-on-child abuse/sexual violence/sexual harassment.

Children may be harmed by other children or young people both in and outside of the College and the College has a zero-tolerance policy for any such child-on-child abuse, sexual violence and harassment. The College recognises that even if none is reported it could be taking place. Staff will be aware of the harm caused by bullying and will use the college’s anti-bullying procedures where necessary. However, there will be occasions when a pupil’s behaviour warrants a response under child protection rather than anti-bullying procedures. This policy includes procedures for dealing with such instances of child-on-child abuse, sexual violence and sexual harassment both in and outside the College.

Child-on-Child abuse can take many forms, including but not limited to (as listed in KCSIE 2022):

- bullying (including cyberbullying, prejudice-based and discriminatory bullying);
- abuse in intimate personal relationships between peers;
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse);
- sexual violence, such as rape, assault by penetration and sexual assault; (this may include an online element which facilitates, threatens and/or encourages sexual violence);

- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse;
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party;
- consensual and non-consensual sharing of nudes and semi 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; and
- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation, both online or in person, used as a way of initiating a person into a group and may also include an online element).

Abuse is abuse and should never be tolerated or passed off as 'banter' or 'part of growing up'. The College recognises that girls are more likely to be victims and boys the perpetrators, however this is not always the case. Different gender issues can be prevalent when dealing with child-on-child abuse, for example girls being sexually touched/assaulted or boys being subject to initiation/hazing type violence. At our college, we take the following steps to minimise or prevent the risk of child-on-child abuse and to ensure that we help prevent problematic, abusive or violent behaviour in the future.

- An open and honest environment where young people feel safe to share information about anything that is upsetting or worrying them. Support systems are easily accessible, including house staff, tutors, teachers, Medical Centre, Safeguarding Team, School Listener, activities and clubs aimed at promoting well-being and relationships.
- Committees aimed at giving students a voice on such issues at the College include the weekly Equality, Diversity and Inclusivity (EDI) Committee and the LGBTQIA+ group meetings which are overseen by staff and provide a safe space for students to raise their concerns.
- Assemblies, talks and PSHEE lectures are used to provide a moral framework outlining acceptable behaviour and stressing the effects of bullying. These will also teach about relationships, sex and health education. This is done using the College's counselling services as well as the PSHEE programme.
- RE, PSHEE and other group activities are used to reinforce the message through stories, role play, current affairs and other suitable activities as part of our preventative education approach.

- Staff will endeavour always to create surroundings where everyone feels confident and at ease in college.
- Staff should understand that even if there are no reported cases of child-on-child abuse, such abuse may still be taking place and is simply not being reported.
- Staff will recognise that it is more likely that girls will be victims and boys perpetrators, but that all child-on-child abuse is unacceptable and will be taken seriously
- Staff will also recognise that those pupils who identify as part of the LGBTQIA+ community may require additional support and the DSL liaises regularly with the staff and pupils on the EDI and LGBTQIA+ committees.
- We will ensure that the college is well supervised, especially in areas where children might be vulnerable.
- All staff should be able to reassure victims that they will be supported and kept safe. A victim will never be made to feel ashamed for making a report. They will often feel extremely distressed which may be heightened if the alleged perpetrator is also at the College. It is also noted that siblings may be affected by such incidents occurring.
- All staff will receive training on recognising the signs of this and how to act in such circumstances.

All allegations of child-on-child abuse should be passed to the DSL immediately (via email, phone, in-person or via the MyConcern portal). All information will then be added to a MyConcern so accurate record keeping may commence. They will then be investigated and dealt with as follows.

- Information gathering – children, staff and witnesses will be spoken with as soon as possible to gather relevant information quickly to understand the situation and assess whether there was intent to cause harm.
- Decide on action – if it is believed that any young person is at risk of significant harm, a referral will be made to children’s social care. The DSL will then work with children’s social care to decide on next steps, which may include contacting the police. The College notes that a victim may ask the school not to tell anyone about the sexual violence or harassment incident. If a victim does not give consent to share information, the school may still lawfully share it and the DSL will then make the decision on next steps to ensure the pupil is safeguarding at home and at school. The

DSL will make the decision balancing the victim's wishes against the school's duty to protect the victim and other children at the school.

- Inform parents - as with other concerns of abuse, the college will normally seek to discuss concerns about a pupil with parents. Our focus is the safety and wellbeing of the pupil and their wishes so if the college believes that notifying parents could increase the risk to the child or exacerbate the problem, advice will first be sought from children's social care and/or the police before parents are contacted.

## Supporting those involved

The support required for the pupil who has been harmed will depend on their circumstance and the nature of the abuse. Support could include counselling, mentoring, the support of family and friends and/or support with improving peer relationships or some restorative justice work.

Support may also be required for the pupil that harmed. We will seek to understand why the pupil acted in this way and consider what support may be required to help the pupil and/or change behaviours. Once those needs have been met, the consequences for the harm caused or intended will be addressed. As KCSIE states "taking disciplinary action and still providing appropriate support are not mutually exclusive actions. They can, and should, occur at the same time if necessary."

If the report is found to be unsubstantiated, unfounded, false or malicious a full written report should be made. The DSL should then look at why the allegation has been made and if it is a cry for help. Appropriate referral should be made.

The school will also consider the role of social media in potentially exacerbating an incident and also spreading false rumours or exposing a victim's identity online.

Further help and advice is available from the NSPCC framework on harmful sexual behaviour and the Lucy Faithfull Foundation HSB Toolkit.

## Serious violence

All staff are made aware of indicators that children are at risk from or are involved with serious violent crime. These include increased absence, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries.

Unexplained gifts could also indicate that children have been approached by or are involved with individuals associated with criminal gangs and may be at risk from exploitation.

All staff should be aware of the range of risk factors which increase the likelihood of involvement in serious violence, such as being male, having been frequently been absent from school, having experience child maltreatment and having been involved in offending such as theft or robbery. Information about County Lines is available via Annexe B of KCSIE. Any concerns must be immediately reported to the DSL.

## Online safety

As schools increasingly work online, it is essential that children are safeguarded from potentially harmful and inappropriate material. Staff receive training in online safety and recognising the signs of online-abuse at the start of each year. The use of technology has become a significant component of many safeguarding issues, such as child sexual exploitation, radicalisation and sexual predation. All aspects are covered in staff training.

The breadth of issues covered within online safety is considerable but can be clarified into four categories:

- Content: inappropriate or harmful material
- Contact: harmful interactions
- Conduct: personal behaviour that causes harm to others or themselves
- Commerce: gambling, gaming etc

We have ensured that appropriate wifi-filters and monitoring systems are in place to manage the content available to pupils, who can contact our pupils and the personal conduct of our pupils online. Pupils must abide by the Acceptable Usage Policy, which they will sign upon joining. Updates are publicised to pupils via assemblies and tutor groups. Pupils also receive regular lessons on appropriate use of technology as well as visiting speakers and PSHEE Online Safety days, with parents invited to annual parental talks on online safety.

Usage of Mobile phones, smart and other technology is carefully managed and changes as students age and progress through the College. Mobile phones are not permitted to be used around campus and must only be used in communal areas (day pupils) and in rooms (boarders). Godman House (years 7-9) has a stricter policy governing the use of phones as pupils learn to live alongside technology. Any person (including staff, visitors, parents or other pupils) in the EYFS are not permitted to use mobile phones or cameras in that age group setting.

Staff should also be aware that pupils with a particular skill or interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime. If there is a concern this should be reported to the DSL who may consider referring to the Cyber Choices

programme supported by the Home Office. The National Cyber Security Centre – NCSC.GOV.UK provides advice which can be followed.

## Youth Produced Sexual Imagery and Sexting

There is no accepted definition of 'sexting' but most professionals agree that it refers to the sending or posting of sexually suggestive images, including nude or semi-nude photographs of a person under 18 years of age, via mobiles or over the internet. The UKCIS advice document refers to this as 'youth produced sexual imagery'.

All incidents involving youth produced sexual imagery will be responded to as follows:

- The incident will be referred to the DSL immediately and the DSL will hold an initial review meeting with appropriate staff. If appropriate, this may include seizure of devices and interviews with the young people involved.
- Parents will be informed at an early stage and involved in the process unless there is good reason to believe that involving parents would put the young person at risk of harm.
- At any point in the process, if there is a concern a young person has been harmed or is at risk of harm a referral will be made to children's social care and/or the police immediately in accordance with this policy. Non-consensual sharing of images is illegal and abusive. The College will follow the UKCIS guidance on sharing of nudes and semi-nude images and videos.
- At no point should an adult, including the DSL look for images. For images to be removed from the device, the DSL will advise the child to remove the images from their device and the DSL (or DDSL dependent on gender if appropriate) will then check to see the images have been deleted.
- Consensual image sharing, especially between older children of the same age, may require a different response. It might not be abusive but pupils will be informed that it is illegal. Again the guidance of UKCIS will be followed.

It may be necessary to refer the matter to the police. Once a report is made to the police, the report must be recorded and the police will investigate. This may include seizure of devices and interviews with the young people involved.

## Child Sexual Exploitation (CSE)

CSE involves an individual or group of adults taking advantage of the vulnerability of an individual or groups of children or young people, and victims can be boys or girls and it is a form of child sexual abuse. Children and young people are often unwittingly drawn into sexual exploitation through the offer of friendship and care, gifts, drugs and alcohol, and sometimes accommodation. Sexual exploitation is a serious crime and can have a long-lasting adverse impact on a child's physical and emotional health. It may also be linked to child trafficking.

The college includes the risks of sexual exploitation in the PSHEE curriculum. A common feature of sexual exploitation is that the child often doesn't recognise the coercive nature of the relationship and doesn't see themselves as a victim. The child may initially resent what they perceive as interference by staff, but staff must act on their concerns, as they would for any other type of abuse.

Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE). Both CSE and CCE are forms of abuse and both occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal activity. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources. In some cases, the abuse will be in exchange for something the victim needs or wants and/or will be to the financial benefit or other advantage (such as increased status) of the perpetrator or facilitator. The abuse can be perpetrated by individuals or groups, males or females, and children or adults.

All staff are made aware of the indicators of sexual exploitation and all concerns are reported immediately to the DSL. Indicators of CSE include:

- Unexplained gifts or money
- Change in emotional well-being
- Misuse of drugs or alcohol
- Missing from education for periods of time
- Older boyfriends/girlfriends
- Suffer from sexually transmitted infections
- Display sexualised behaviour beyond expected sexual development age

More information is available in Annexe B of KCSIE

## Honour-Based Abuse

'Honour-based' abuse (HBA) (previously Honour-based Violence) encompasses crimes which have been committed to protect or defend the honour of the family and/or the community,

including Female Genital Mutilation (FGM), forced marriage, and practices such as breast ironing. All forms of HBA are abuse.

### **Forced Marriage**

A forced marriage is a marriage in which a female (and sometimes a male) does not consent to the marriage but is coerced into it. Coercion may include physical, psychological, financial, sexual and emotional pressure. It may also involve physical or sexual violence and abuse. In England and Wales, the practice is a criminal offence under the Anti-Social Behaviour, Crime and Policing Act 2014.

Children may be married at a very young age, and well below the age of consent in England. College staff receive training and should be particularly alert to suspicions or concerns raised by a pupil about being taken abroad and not be allowed to return to England.

A forced marriage is not the same as an arranged marriage. In an arranged marriage, which is common in several cultures, the families of both spouses take a leading role in arranging the marriage but the choice of whether to accept the arrangement remains with the prospective spouses.

Since June 2014 forcing someone to marry has become a criminal offence in England and Wales under the Anti-Social Behaviour, Crime and Policing Act 2014

### **Female Genital Mutilation**

FGM is the collective name given to a range of procedures involving the partial or total removal of external female genitalia for non-medical reasons. It has no health benefits and harms girls and women in many ways. The practice, which is most commonly carried out without anaesthetic, can cause intense pain and distress and long-term health consequences, including difficulties in childbirth.

FGM is carried out on girls of any age, from young babies to older teenagers and adult women, so college staff are trained to be aware of risk indicators. Many such procedures are carried out abroad and staff should be particularly alert to suspicions or concerns expressed by female pupil about going on a long holiday during the summer vacation period.

In England, Wales and Northern Ireland, the practice is illegal under the Female Genital Mutilation Act 2003. Any person found guilty of an offence under the Female Genital Mutilation Act 2003 is liable to a maximum penalty of 14 years imprisonment or a fine, or both. Section 5B of the 2003 Act<sup>1</sup> means that there is a mandatory reporting duty which requires all teachers in England and Wales to report 'known' cases of FGM in under 18s.

### **Reporting cases of FGM**

Whilst all staff should speak to the DSL immediately with any concerns about FGM, there is a specific legal duty on teachers. Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a statutory duty upon teachers to report to the Police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18.

Those failing to report such cases will face disciplinary sanctions. It will be rare for teachers to see visual evidence, and they should not be examining pupils, but the same definition of what is meant by “to discover that an act of FGM appears to have been carried out” is used for all professionals to whom this mandatory reporting duty applies.

A teacher must personally report to the Police cases where they discover that an act of FGM appears to have been carried out. They should also discuss any such case with the Designated Safeguarding Lead. The member of staff should call Gloucestershire Police on 101 or if there is an immediate risk to life or serious harm 999.

## Child Criminal Exploitation (CCE)

Criminal exploitation of children is a geographically widespread form of harm that is a typical feature of county lines criminal activity: drug networks or gangs exploiting children to carry drugs and money from urban areas to suburban and rural areas, market and seaside towns. County lines exploitation can affect any child under the age of 18 years. It can still be exploitation even if the activity appears consensual, can involve force and/or enticement based methods of compliance and is often accompanied by violence or threats of violence. County lines exploitation can be perpetrated by individuals or groups, males or females, and young people or adults and is typified by some form of power imbalance such as age, gender, cognitive ability, physical strength, status, and access to economic or other resources. Children can become trapped by this type of exploitation as perpetrators can threaten victims with violence. Children involved in CCE may also commit crimes themselves and their vulnerability as victims is often blurred by their actions.

Staff need to be aware of the signals to show that children are at risk from, or are involved in serious violent crime, including from organised crime groups involved in county lines. It is vital to note that the indications and experiences for boys and girls from CCE may be very different. Indicators include:

- Increased absences from school.
- A change in friendships or relationships with older individuals or groups.
- A significant decline in performance
- Signs of self harm or a decline in emotional wellbeing □ Signs of assault/unexplained injuries.
- Unexplained gifts/new possessions

- Going missing and subsequently being found in areas away from their home.
- Having been the victim or perpetrator of serious violence, e.g. knife crime.
- Having multiple bank accounts

### **Procedures for reporting concerns**

- Concerns should initially be reported to the DSL/DDSL
- They will assess if the child is in imminent danger. If so, they will contact the local Police Protection Officer/Safer Schools Officer who will either apply for an emergency protection order or they will make a referral through the National Referral Mechanism.
- If the assessment is that the Child is not in immediate danger, the college will follow local safeguarding procedures.
- Unless there are child protection reasons not to, parents/guardians will be contacted.
- Further information can be found in Annexe B of KCSIE

## **Domestic abuse and violence**

This is any incident of threatening behaviour, violence or abuse (psychological, physical, sexual, financial or emotional) between adults who are or have been intimate partners or family members, regardless of gender or sexuality.

The Domestic Abuse Act 2021 recognises the impact of domestic abuse on children, as victims in their own right. Domestic abuse covers a range of abusive behaviours including physical, emotional and economic abuse as well as coercive and controlling behaviour.

During Covid enforced lockdowns, incidents of domestic abuse nationwide increased. Staff should be aware that students can blame themselves when they see or hear physical or verbal violence at home. Students can also be unsettled by an increase in minor quarrels in the home.

Any concerns should be reported to the DSL who will make a referral to GDASS.

## **Other considerations relating to abuse**

It is important to note that children may be adversely affected or vulnerable to abuse, exploitation and neglect in the following circumstances:

### **Child abduction and community safety incidents**

Child abduction is the unauthorised removal or retention of a minor from a parent or anyone with legal responsibility for the child. Child abduction can be committed by parents or other family members; by people known but not related to the victim (such as neighbours, friends and acquaintances); and by strangers.

Other community safety incidents in the vicinity of a school can raise concerns amongst children and parents, for example, people loitering nearby or unknown adults engaging children in conversation.

As children get older and are granted more independence (for example, as they start walking to school on their own) it is important they are given practical advice on how to keep themselves safe. Many schools provide outdoor-safety lessons run by teachers or by local police staff.

It is important that lessons focus on building children's confidence and abilities rather than simply warning them about all strangers. Further information is available at: [www.actionagainstabduction.org](http://www.actionagainstabduction.org) and [www.clevernevergoes.org](http://www.clevernevergoes.org).

### **Children and the court system**

Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. There are two age appropriate guides to support children 5-11-year olds and 12-17 year olds.

The guides explain each step of the process, support and special measures that are available. There are diagrams illustrating the courtroom structure and the use of video links is explained.

Making child arrangements via the family courts following separation can be stressful and entrench conflict in families. This can be stressful for children. The Ministry of Justice has launched an online child arrangements information tool with clear and concise information on the dispute resolution service. This may be useful for some parents and carers.

### **Children with family members in prison**

Approximately 200,000 children in England and Wales have a parent sent to prison each year. These children are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. The National Information Centre on Children of Offenders, NICCO provides information designed to support professionals working with offenders and their children, to help mitigate negative consequences for those children.

### **Modern Slavery and the National Referral Mechanism**

Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including: sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs.

Further information on the signs that someone may be a victim of modern slavery, the support available to victims and how to refer them to the NRM is available in the Modern Slavery Statutory Guidance. Modern slavery: how to identify and support victims - GOV.UK ([www.gov.uk](http://www.gov.uk))

## Cybercrime

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

If there are concerns about a child in this area, the designated safeguarding lead (or a deputy), should consider referring into the **Cyber Choices** programme. This is a nationwide police programme supported by the Home Office and led by the National Crime Agency, working with regional and local policing. It aims to intervene where young people are at risk of committing, or being drawn into, low level cyber-dependent offences and divert them to a more positive use of their skills and interests.

Note that **Cyber Choices** does not currently cover 'cyber-enabled' crime such as fraud, purchasing of illegal drugs on-line and child sexual abuse and exploitation, nor other areas of concern such as on-line bullying or general on-line safety.

Additional advice can be found at: Cyber Choices, 'NPCC- When to call the Police' and National Cyber Security Centre - NCSC.GOV.UK

## Radicalisation and Extremism

The government defines extremism as vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs.

Some children are at risk of being radicalised: adopting beliefs and engaging in activities which are harmful, criminal or dangerous. Islamic extremism is the most widely publicised form and schools should also remain alert to the risk of radicalisation into white supremacy extremism and Incel culture. College staff receive training in inclusivity and diversity to help to identify signs of extremism. Opportunities are provided in the curriculum to enable pupils to discuss issues of religion, ethnicity and culture and the college promotes fundamental British Values as part of PSHEE.

**Any child, in any family in any college could become a victim of abuse. Staff should always maintain an attitude of "it could happen here".**

## Private fostering arrangements

A private fostering arrangement occurs when someone other than a parent or a close relative cares for a child for a period of 28 days or more, with the agreement of the child's parents. It applies to children under the age of 16, or aged under 18 if the child is disabled. Children looked after by the local authority or who are placed in a residential school, children's home or hospital are not considered to be privately fostered.

Private fostering occurs in all cultures, including British culture and children may be privately fostered at any age.

Most privately fostered children remain safe and well but safeguarding concerns have been raised in some cases so it is important that schools are alert to possible safeguarding issues, including the possibility that a child has been trafficked into the country.

By law, a parent, private foster carer or other persons involved in making a private fostering arrangement must notify children's services as soon as possible.

Where a member of staff becomes aware that a pupil may be in a private fostering arrangement they will raise this with the DSL and the college should notify the local authority of the circumstances.

## Staff induction

To ensure all staff at Rendcomb College are aware of their safeguarding duties we run a thorough safeguarding induction for all new staff.

Staff joining the College at the start of the academic year will:

- Receive a training session from the DSL during their new staff induction day, which will introduce them to:
  - o Who the Safeguarding team are
  - o What to do if they need to make a referral or receive a disclosure
  - o The procedures for dealing with child-on-child abuse
  - o Training on usage of the MyConcern safeguarding portal
  - o A chance to complete the online SafeSmart safeguarding training, which incorporates compulsory training on the Prevent legislation as part of the course.
  - o Attend the all staff safeguarding update (delivered by the DSL)
  - o Attend any staff safeguarding training delivered by an external provider
  - o Links to all key documents to read, including the Safeguarding and Child Protection policy, which includes guidance on Low Level Concerns, the Pupil Behaviour Policy, the Whistleblowing Policy, the Online Safety and Acceptable Use of IT Policies, the Staff Code of Conduct which includes guidance on staff/pupil relationships

Staff joining the College during any part of the academic year will:

- Receive a training session from the DSL during their new staff induction day, which will introduce them to:
  - Who the Safeguarding team are
  - What to do if they need to make a referral or receive a disclosure
  - The procedures for dealing with child-on-child abuse
  - Training on usage of the MyConcern safeguarding portal
  - A chance to complete the online SafeSmart safeguarding training, which incorporates compulsory training on the Prevent legislation as part of the course.
  - An update from the DSL on important safeguarding matters in the College
  - Links to all key documents to read, including the Safeguarding and Child Protection policy which includes guidance on Low Level Concerns, the Pupil Behaviour Policy, the Whistleblowing Policy, the Online Safety and Acceptable Use of IT Policies, the Staff Code of Conduct which includes guidance on staff/pupil relationships,

All new staff whose job involves regular and direct contact with pupils will read, and confirm understanding, of KCSIE Part 1 and Annex B. Those whose job does not involve regular direct contact with pupils will read Annexe A, which is the abridged version of Part 1.

## Staff guidance

To assist all staff (teaching and business support) the college will provide:

- Regular INSET training (every year, both online and face to face.)
- Documentation from the INSET training
- Regular updates from the relevant safeguarding bodies and authorities including updates on KCSIE
- Guidance on: managing reports of child-on-child abuse and of reports of abuse, exploitation and neglect; the local early help process; the referral process to children's social care.
- Reinforcement of how to support victims including by reassuring them that they are being taken seriously and that they will be supported and kept safe so that no victim will be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment and no victim ever be made to feel ashamed for making a report.

## Links for Staff (induction and training)

All Staff (existing and new joining) **must** sign a form (which is held on file) to show they read and understood the following documents which are linked with the Safeguarding Children Policy and are available in the Staff Handbook:

- Safeguarding Code of Conduct for staff
- Part 1 of Keeping Children Safe in Education or the abridged version Annexe A (As mentioned in the Staff Induction section).
- Acceptable Use Policy for IT (including use of mobile technology)

In addition to this Teaching staff **must** also have read the following:

- Anti-Bullying Policy and Procedures (including cyberbullying and sexting)
- Safer Recruitment Policy
- Physical Restraint Policy
- Mental Health Policy
- Whistleblowing Policy
- Drugs Policy
- Pupil Behaviour Policy
- Children Missing in Education section of this policy (Page 29)

## Elective Home-Education

Many home educated children have an overwhelmingly positive learning experience. We would expect the parents' decision to home educate to be made with their child's best education at the heart of the decision. However, this is not the case for all, and home education can mean some children are less visible to the services that are there to keep them safe and supported in line with their needs. The College will inform the LA of all deletions from their admission register when a child is taken off roll without the appropriate school transfer process being followed.

Where a parent/carer has expressed their intention to remove a child from school with a view to educating at home, the College will liaise with the Local Authority and other key professionals to coordinate a meeting with parents/carers where possible. Ideally, this would be before a final decision has been made, to ensure the parents/carers have considered what is in the best interests of each child. This is particularly important where a child has SEND, is vulnerable, and/or has a social worker.

## Safeguarding students with Special Educational Needs

We recognise that children with special educational needs (SEN) and disabilities can face additional safeguarding challenges and this policy reflects the fact that additional barriers, including mental health, peer group isolation and bullying can exist when recognising abuse and neglect in this group of children. This can include:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration;
  - Children with SEN and disabilities can be disproportionately impacted by issues such as bullying (particularly cyberbullying) sometimes without showing any obvious signs; and
- There are sometimes communication barriers due to physical or social issues, which means that students do not or are not able to make a disclosure.

To ensure that we effectively safeguard our students with special educational needs, the DSL liaises regularly with the college SENCO. This includes a weekly meeting where students are discussed and joint strategies put in place. Communication to relevant parties involved in that child's care is regular and appropriate.

When applying disciplinary measures such as restraint or isolation in response to incidents involving children with SEN and disabilities, it is important to consider the risks carefully, given the additional vulnerability of the group. To safeguard a pupil others, it may be necessary to use restraint and yet restraint is likely to impact on the well-being of the child. Consequently it is important to plan positive and proactive behaviour support, which will reduce the occurrence of risky behaviour and the need to use restraint. Guidance is available here: use of reasonable force in schools.

## Children with a social worker

Children may need a social worker due to safeguarding or welfare needs. Children may need this help due to abuse, neglect and complex family circumstances. A child's experiences of adversity and trauma can leave them vulnerable to further harm, as well as educationally disadvantaged in facing barriers to attendance, learning, behaviour and mental health. The designated safeguarding lead should hold and use this information so that decisions can be made in the best interests of the child's safety, welfare and educational outcomes. This should be considered as a matter of routine. There are clear powers to share this information under existing duties on both local authorities and schools and colleges to safeguard and promote the welfare of children.

## Looked after children

The most common reason for children becoming looked after is as a result of abuse or neglect. The college ensures that staff have the necessary skills and understanding to keep looked after children safe. The designated teacher for looked after children is the DSL who will have information about a child's looked after legal status and care arrangements, including the level of authority delegated to the carer by the authority looking after the child as well as details of the child's social worker and the name and contact details of the local authority's virtual head for children in care. As part of any referral the College will provide all relevant information on such arrangements as part of a referral to the appropriate bodies so any

assessment to consider all the available evidence is available to enable a contextual approach to address such harm.

## Children Missing in Education

**Children Missing Education (CME)** refers to 'any child of compulsory school age who is **not** registered at any formally approved education activity e.g. school, alternative provision, elective home education, **and** has been out of education provision for at least 4 weeks'.

**CME** also includes those children who are **missing** (family whereabouts unknown), and are usually children who are registered on a school roll/alternative provision. This might be a child who is not at their last known address **and either**

- has not taken up an allocated school place as expected, or
- has 10 or more days of continuous absence from the college without explanation, or
  - left the college suddenly and the destination is unknown

For this reason it is vital that prolonged absences are referred to the DSL who will consider a referral to: Access to Education Team, Shire Hall, Westgate Street, Gloucester GL1 2TP. Tel 01452 328774 / 426015 or email [missingpupils@gloucestershire.gov.uk](mailto:missingpupils@gloucestershire.gov.uk)

## Children staying with host families

The college may arrange for pupils to stay with a host family during a foreign exchange trip or sports tour while some overseas pupils may reside with host families during college terms.

It is not possible for schools to obtain criminal record information from the DBS about adults abroad. Where pupils stay with families abroad, we will agree with partner schools a shared understanding of the arrangements in place. Staff will use their professional judgement to satisfy themselves that the arrangements are appropriate to safeguard the pupils, which will include ensuring pupils understand who to contact should an emergency occur, or a situation arise which makes them feel uncomfortable. We will also make parents aware of these arrangements.

The college follows the guidance in Annex E of *Keeping Children Safe in Education (2019)* to ensure that hosting arrangements are as safe as possible.

## Confidentiality

All staff will understand that child protection issues warrant a high level of confidentiality, not only out of respect for the pupil and staff involved but also to ensure that information being released into the public domain does not compromise evidence.

Staff should only discuss concerns with the DSL, Headteacher/principal or chair of governors (depending on who is the subject of the concern). That person will then decide who else needs to have the information and they will disseminate it on a 'need-to-know' basis.

Child protection information will be stored and handled in line with the General Data Protection Regulation (GDPR). Information sharing is guided by the following principles;

The information is:

- necessary and proportionate relevant
- adequate
- accurate
- timely
- secure.

Information sharing decisions will be recorded, whether or not the decision is taken to share.

Record of concern forms and other written information will be stored in a locked facility or kept electronically secure on our specialist encrypted database. Any electronic information will be password protected or encrypted and only made available to relevant individuals.

Child protection information will be stored separately from the pupil's college file and the college file will be 'tagged' to indicate that separate information is held.

The DSL will normally obtain consent from the pupil and/or parents to share sensitive information within the college or with outside agencies. Where there is good reason to do so, the DSL may share information *without* consent, and will record the reason for not obtaining consent.

If any member of staff receives a request from a pupil or parent to see child protection records, they will refer the request to the DSL.

The GDPR does not prevent college staff from sharing information with relevant agencies, where that information may help to protect a child.

## Safer recruitment

Our college complies with the requirements of Keeping Children Safe in Education (2021) and the local safeguarding partner arrangements by carrying out the required checks and verifying the applicant's identity, qualifications and work history. The college's Staff Recruitment policy

and procedures set out the process in full. At least one member of each recruitment panel will have attended safer recruitment training.

## Volunteers

Volunteers, including governors will undergo checks commensurate with their work in the college, their contact with pupils and the supervision provided to them. Under no circumstances will a volunteer who has not been appropriately checked be left unsupervised.

## Site security and external visitors

Visitors to the college are asked to sign in and are given a badge, which confirms they have permission to be on site. Parents who are simply delivering or collecting their children do not need to sign in. All visitors are expected to observe the college's safeguarding and health and safety regulations. The head teacher will exercise professional judgement in determining whether any visitor should be escorted or supervised while on site.

For visitors who attend the College in a professional capacity, an ID check will be carried out and when appropriate a DBS check will be required. This can be seen by the accompanying staff member or the DSL/DDSL in advance.

When use of a contractor on site is required the College will outline the safeguarding requirements via the Reception Manager.

## Extended school and off-site arrangements

All extended and off site activities are subject to a risk assessment to satisfy health and safety and safeguarding requirements. Where extended school activities are provided by and managed by the college, our own child protection policy and procedures apply. If other organisations provide services or activities on our site on behalf of the college, we will check that they have appropriate procedures in place and inspect them where necessary, including safer recruitment procedures. When there is a transfer of control of the site (ie a Summer Camp), the College will ensure that safeguarding requirements are included in such a transfer. Failure to comply by the leasing company would result in the termination of the contract.

When our pupils attend off-site activities, including day and residential visits and work related activities, we will check that effective child protection arrangements are in place.

## Disguised Compliance

Disguised compliance occurs when a parent or carer gives the appearance of co-operating with child welfare agencies to avoid raising suspicions, to allay professional concerns and ultimately to diffuse professional intervention. Published case reviews highlight that professionals sometimes delay or avoid interventions due to parental disguised compliance. The learning from these reviews highlights that professionals need to establish the facts and gather evidence about what is actually happening, rather than accepting parent's presenting behaviour and assertions. By focussing on outcomes rather than processes professionals can keep the focus of their work on the child.

### Risk factors in disguised compliance

- **Missing opportunities to make interventions** - A reduction or downgrading in concern on the part of professionals can allow cases to drift, so losing the opportunity to make timely interventions.
- **Removes the focus from the child** - Disguised compliance can lead to a focus on adults rather than on achieving safer outcomes for the child.
- **Over optimism about progress** - Professionals can become over optimistic about progress being achieved, again delaying timely interventions.

### Recognising disguised compliance

- **Parents deflecting attention** - Parents focus on engaging well with one set of professionals, for example in education, to deflect attention from their lack of engagement with other services.  
**Criticising professionals** - Parents criticise or are confrontational to professionals within the college and other organisations to divert attention away from their own behaviour.
- **Failure to engage with services as recommended** - Parents promise to take up services offered but then fail to attend.
- **Avoiding contact** - Parents promise to change their behaviour and then avoid contact with professionals.

### Improved practice to avoid disguised compliance

Recording can become focussed on the adult's participation and parenting capacity. Instead the focus should be on recording the children's perspective and situation and for this reason,

- The child should be spoken to in order to establish facts, ideally before parents or carers.
- Focus should be on outcomes rather than process, so that attention cannot be deflected by good intent or an appearance of participation.
- Identify and establish clear, understandable and measurable outcomes and take action when outcomes are not achieved within agreed time scales.
- In addition, it is sometimes easy to become overly optimistic about change that has occurred or will occur as a result of promises but not action. It is therefore important to see evidence of actual progress and to make timely referrals when this is not forthcoming.

## Procedures for Safeguarding Children at Rendcomb College:

### Overview

It is college policy to comply fully with the child protection procedures established by Gloucester County Council for use in educational establishments.

The college has an important role in its frequent contact with the children. The staff get to know the children quite well: they form trusting relationships; they see changes in behaviour, and they are available for the sharing of concerns.

It is the policy of Rendcomb College to safeguard the welfare of the children by protecting them from physical, sexual and emotional abuse, neglect and bullying. As such staff are informed of the definitions of these and other forms of Child Abuse through the Definitions of Child Abuse in the staff handbook and in Part 1 of 'Keeping Children Safe in Education'. A bullying incident will be treated as a child protection concern where there is reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm. Where an allegation is made against a pupil of the college, the college's Behaviour Policy shall apply. The college will take advice from child protection agencies as to appropriate action to ensure the safety and welfare of all members of the college community involved including the alleged abuser. Parents will be informed as soon as possible, unless it is not in the best interests of the child to do so.

It is the responsibility of each member of staff (that is anyone working in the college, paid, unpaid, contracted for services or not including supply staff and volunteer) to ensure that their behaviour is appropriate at all times. If there is an allegation or suspicion of abuse, this must be referred immediately to the college Designated Safeguarding Lead. In the college, the Designated Safeguarding Lead (DSL) is Jonnie Howorth (Deputy Head Pastoral) who is a member of the Senior Leadership Team. The college deputies are Caroline Collett, who is a

Sister in our Medical Centre, Fiona Auster who is the J5 Teacher and Marian James who is a Senior school teacher and Head of PSHEE. For the Early Years Foundation Stage the responsibility is devolved to the Junior College Deputy DSL, although the college DSL will have the overall responsibility.

The college is not an investigation or intervention agency. At all times the child's welfare must be paramount. Swift reporting will enable the correct authorities to give advice and take appropriate action. There is an obligation for the college to act in this way.

Any information conveyed by a member of staff to the college DSL must not be withheld or filtered but must be passed on immediately to the correct agency. These procedures are not negotiable; they enable the Governors to fulfil their legal as well as moral responsibilities. The member of staff should never give absolute guarantee of confidentiality but assure the pupil or adult that they will only pass on information to the minimum number of people who need to be told. They should also emphasise that they will take whatever steps are necessary to protect the informing pupil or adult from any retaliation or unnecessary stress that might be feared after a disclosure of alleged abuse has been made.

Any allegations made against volunteers or staff should be directly and immediately referred to the Headmaster. If the Headmaster is absent the allegation will be passed to the Chair of Governors. No investigation or questioning is to be undertaken. If the Headmaster is implicated the information must be sent directly to the Chair of Governors without informing the Headmaster. If the allegation involves the DSL, immediately inform Headmaster. All allegations or suspicions are to be referred, no matter how insignificant they may seem to be, or when they occur.

The DSL will:

- keep a full record of reports made in a separate confidential file
- consider the wishes of the pupil concerned (taking into account the pupil's maturity and understanding), provided they have been properly informed and consulted. Circumstances may arise where the pupil's wishes need to be overridden.
- consider the parents' wishes, provided informing the parents does not put the pupil at risk and they have no interest which would conflict with the pupil's best interests.
- give a broad view to the Headmaster where necessary and appropriate and within the guidelines provided by the Safeguarding Policy and Procedures. (if the allegation involves the Headmaster, the Chair of Governors will be informed under similar guidelines).

Once a concern or complaint has been reported, the DSL will contact the Local Authority Designated Officer for advice on deciding whether to make a formal referral in a case of alleged or suspected abuse.

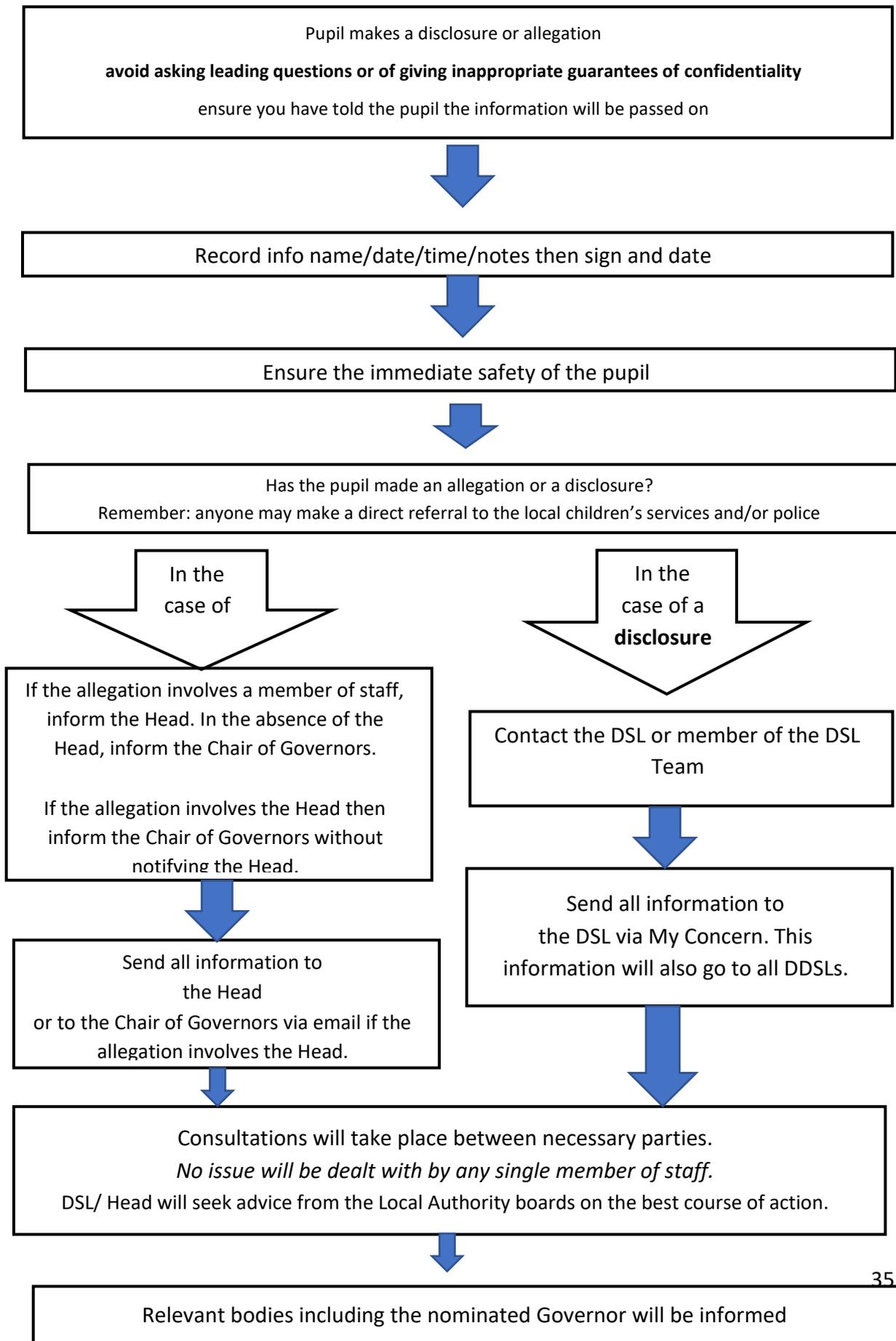
The college will not do anything that may jeopardise a police investigation. As soon as sufficient concern exists that a child is at risk of significant harm, the DSL will refer the matter **without delay** to the child protection agencies (and in any event within 24 hours of disclosure or suspicion of abuse), **without further investigation within the college.**

A complaint involving a serious criminal offence will always be referred to the social services or the police.

All further responsibility for gathering information and deciding what happens next will rest primarily with the child protection agencies.

## Safeguarding Procedures and reporting concerns at Rendcomb College

### Summary Procedure



## Further details on Safeguarding procedures at Rendcomb College:

Jonnie Howorth; tel: 01285 832333 or 07801273353; or you can email [dhp@rendcombcollege.org.uk](mailto:dhp@rendcombcollege.org.uk)

If they are unavailable, you may contact the Deputy Designated Safeguarding Leads:  
Caroline Collett tel: 01285 832369 or 07791831190 or you can email [CollettC@rendcombcollege.org.uk](mailto:CollettC@rendcombcollege.org.uk) or Marian James on [JamesM@RendcombCollege.org.uk](mailto:JamesM@RendcombCollege.org.uk) or tel: 01285 832365

If the matter involves children in the Junior please contact Fiona Auster, tel: 01285 832310 or email [AusterF@rendcombcollege.org.uk](mailto:AusterF@rendcombcollege.org.uk) or contact any of the above named.

If there is any injury to the child which requires treatment, the member of staff responsible for the child should contact Sister in the Medical Centre: tel: 01285 832329; mobile: 07786 653983

At all times, the college DSL will follow the guidelines given in The Gloucestershire Safeguarding Children Board's Handbook which can be found here <https://www.gloucestershire.gov.uk/media/2103929/gloucestershire-revised-loi-guidance-v8-july-2021.pdf>

In order to decide whether the concern meets the necessary threshold for referral, the DSL will consult the Gloucestershire's levels of intervention guidance

If the DSL is still unsure if the concern meets the necessary threshold for referral, the DSL will have a discussion with the Children and Families helpline via the 'Front Door' 01452 426565 (option 3) or the Community Social Worker for the Cotswolds 01452 328101.

In cases where the Designated Safeguarding Lead decides that either an Early help referral or a social work assessment is required, in the case of a 'child in need', a referral will be made in the first instance using the Multi Agency Service Request Form. If the concern is that the child is 'at risk' an urgent referral will be made via the GSCB 'Front Door' 01452 426565 option 1 (urgent).

If there is a concern for immediate safety out of hours, the emergency duty team will be contacted on 01452 614194. If the child is felt to be in any danger, he or she should not be allowed to go home, if this is at all possible.

If the DSL/DDSL has a concern about a pupil being radicalised they will contact either 101, or the Department for Education's dedicated helpline (020 7340 7264) or email [counter.extremism@education.gsi.gov.uk](mailto:counter.extremism@education.gsi.gov.uk). In emergency situations, such as a child being at

immediate risk of harm or in the event of a security incident, normal emergency procedures will be followed.

If you feel there is a concern about child protection failures internally, or have concerns about the way a concern is being handled by the College, staff can call 0800 0280285 from 8am to 8pm or email [help@nspcc.org.uk](mailto:help@nspcc.org.uk)

Charity Commission guidance on charity and trustee duties to safeguard children is available at Gov.Uk

**Disclosures:** If a child discloses to you:

- Stay calm
- Do not communicate shock, anger or embarrassment
- Reassure the child: tell them you are pleased that they are speaking to you
- Reassure them also that they will be taken seriously, supported and kept safe and not made to feel that they are creating a problem for reporting abuse, sexual harassment or sexual violence.
- Never agree or promise to keep it a secret: confidentiality is not possible.
- Assure them that you will try to help but let the child know that you will have to tell other people in order to do this. State who this will be and why
- Report this immediately to the DSL or in their absence a DDSL.
- Make a clear record of what the child has said to you and give this via My Concern (or if necessary directly) to the DSL or DDSL.
- Do not ask leading questions.
- Do not make any comments about the alleged offender.
- Remain supportive but neutral.
- Write down either at the time or as soon as possible afterwards the disclosure using the child's own words as far as possible
- If the child is injured you must not take a photograph but simply note the injury in your report. Do not examine any part of the child's body normally covered by clothing.
- Record any questions you may have asked, but do not include any personal opinions or comments. Add the time and date and sign the report. Ensure that a member of the Safeguarding team receives this report immediately.
- Ensure that the child is safe.
- Take the child to the Medical Centre if appropriate.
- Do tell the child that you must speak immediately to the DSL or a DDSL and that a member of the Safeguarding or Medical will then keep them safe.
- Be guided by the DSL or DDSL as to what you should do next: do not

investigate yourself.

- Do not discuss the issue with colleagues, friends, family or anyone else unless otherwise directed by the DSL or DDSL.
- If you just suspect abuse but there is no disclosure, report your suspicion immediately to the DSL or in their absence a DDSL.
- Be aware that should the need arise you may directly contact local children's services and/or the Police directly; in such cases it is helpful to advise the DSL or a DDSL of the action you have taken.
- If DSL/DDSL not available, report to the most senior member of staff available or report yourself using the contact details at the start of this policy.
- and then inform the DSL at the earliest opportunity.

**Disclosures of child-on-child abuse including sexual harassment or sexual violence:**

If a child or anyone else discloses to you:

- Follow the guidance for disclosures above
- Report this immediately to the DSL or in their absence a DDSL.
- Make a clear record of what the child has said to you or of the information given to you.
- Be guided by the DSL or DDSL as to what you should do next: do not investigate yourself.
- Remember that there is zero tolerance of child-on-child abuse including harassment.
- If you just suspect abuse but there is no disclosure, report your suspicion immediately to the DSL or in their absence a DDSL.

**Allegations against staff, including volunteers, contractors and supply staff, other than the Head:** if you wish to make an allegation:

- Report an allegation immediately to the Head without informing the person against whom the allegation has been made.
- Ensure that any child involved is safe.
- Do not discuss the issue with colleagues, friends, pupils, family or anyone else unless otherwise directed by the Head.
- Be aware that you may directly contact local children's services and/or the Police directly.

**Allegations against the Head:** if you wish to make an allegation:

- Report this immediately to the Chair of Governors without informing the Head.
- Ensure that any child involved is safe.
- Do not discuss the issue with colleagues, friends, pupils, family or anyone

else unless otherwise directed by the Chair of Governors

- Be aware that should the need arise you may directly contact local children's services and/or the Police directly.

#### **Low-level Allegations/Concern (Further details of this are on page 40)**

- A Low Level Allegation/Concern is a concern that does not meet the harms threshold as outlined in KCSIE 2021. If you have a niggling doubt about any situation involving staff, report this immediately to the Head or if it concerns the Head to the Chair of Governors, without informing the person regarding whom you have a niggling doubt or any other person.

#### **Duty of care:**

- all staff and volunteers must take reasonable care of pupils under their supervision, protecting them from harm and seeking to promote and safeguard their welfare.

#### **Professional Conduct:**

- everyone should always consider whether their words and actions are warranted, proportionate, safe and applied equitably;
- all pupils must be treated the same – favouritism of any sort is unacceptable;
- be aware of pupils' emotional needs – personal comments, sarcasm, embarrassing or humiliating words are always unprofessional;
- avoid language that is sexual, sexist or racist in tone or talk that is discriminatory or intimidating in nature;
- avoid inappropriate conversation, including innuendo, salacious gossip or swearing;
- never behave in a way that demeans or undermines a pupil, his/her parents, carers, friends or relatives;
- particular care should be taken by peripatetic or other staff who may work or teach on a one-to-one basis, by those involved in the personal care of children, and by those who may come into physical contact in the course of educational demonstrations with pupils;
- should the need for reasonable restraint arise, this should be reported immediately to the Head or Deputy Head Pastoral.

#### **Personal integrity:**

- recall that employees and volunteers occupy a professional "position of trust" and so, by law, must not attempt to cultivate any sort of intimate or sexual relationship with a pupil;
- avoid behaviour and conversation that might cause a reasonable adult to question your suitability to work with other people's children;
- avoid dressing in a way that might be construed as sexually provocative;

- never behave in a way that might be thought of as showing favouritism to individual children;
- staff and volunteers should talk immediately to a member of the senior leadership if they sense a possibility their demeanour, words or actions might have been misconstrued.

**Social contact:**

- nobody should arrange to contact or meet pupils outside the school setting except for reasons associated with work at the School and agreed in advance by the senior leadership;
- at School or when on School business (e.g. trips and visits), never meet pupils one-to-one behind a closed door;
- never cover the glass panels in classroom doors, or close curtains or blinds when meeting pupils in School;
- be aware of pupils' personal space – physical contact is wholly inappropriate, except in very limited circumstances (when a necessary part of the employee's professional duties);
- never smoke or take drugs in the presence of pupils: only drink alcohol when pupils are present if the occasion is sanctioned by the senior leadership;
- staff and volunteers should never take pupils on a journey in their car – except in circumstances appropriately sanctioned and covered by the School's policy on Educational Visits;

**Treatment of pupils:**

- everyone should value and respect pupils as individuals, behaving towards them in a safe, fair, mature and considered manner:
- never seek personal friendship with pupils;
- build relationships with pupils that have a professional character – treat all pupils equally;
- never make unprofessional remarks about pupils' appearance and dress, or make comments touching on physique or body image;
- avoid trivialising the significance of smoking, alcohol and drug abuse;
- never make inappropriate attempts at humour touching on anxiety and depression, harassment or self-harm;
- staff and volunteers should avoid discussing their intimate personal relationships in conversation with pupils;
- pupils should never be made to feel that they are creating a problem by reporting bullying or harassment;
- remember that at all times that zero tolerance means exactly that – all inappropriate pupil conduct must be challenged and reported: it is not a sign of weakness to seek support from others should you find it difficult to challenge inappropriate pupil behaviour.

**Behaviour online:**

- nobody should ever exchange personal contact details (address, e-mail, details, telephone number) with a pupil at the School:
- never use social networking sites to have personal contact with pupils at the School;
- never take or store photographs of pupils on the memory of any personal device;
- take special care when posting personal photographs on sites like Facebook – think of such sites as places where images are on public display.

**Confidentiality:**

- no employee or volunteer should ever promise to keep confidential or secret something told them by a pupil.

**Further information on managing allegations and Low Level Concerns**

If an allegation is made or information is received about an adult who works at Rendcomb College which indicates that they may be unsuitable to work with children, the member of staff receiving the information should inform the Head of College immediately. The Head will contact the LADO and seek guidance immediately.

Should an allegation be made against the Head, this will be reported to the Chair of Governors

In the event that neither the Head of College nor the Chair of the Governing Body is contactable on that day, the information must be passed to and dealt with by either the member of staff acting as Head or the Vice Chair of Governors as appropriate.

The Head or Chair of Governors will seek advice from the LADO immediately. No member of staff or the governing body will undertake further investigations before receiving advice from the LADO.

We do recognise that sometimes the behaviour of adults may lead to an allegation of abuse being made.

All information and records relating to Low Level Concerns will be kept by the Head of College as stipulated by KCSIE 2021. The Head of College will review and monitor such concerns so any patterns of concerning, problematic or inappropriate behaviour can be identified and responded to. Any records of Low-Level Concerns relating to the Head of College will be kept by the Chair of the Governing Body.

We will take all possible steps to safeguard our children and to ensure that the adults in our school are safe to work with children. We will always ensure that the procedures outlined in the relevant parts of *'Keeping Children Safe in Education'*, are adhered to and will seek appropriate advice from the Local Authority Designated Officer (LADO).

Rendcomb College will follow KCSIE guidance where it is alleged that anyone working in the school or School that provides education for children under 18 years of age, including supply teachers and volunteers has:

- behaved in a way that has harmed a child, or may have harmed a child;
- possibly committed a criminal offence against or related to a child;
- behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children; or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children.

The KCSIE guidance relates to members of staff, supply staff and volunteers who are currently working in any school or School regardless of whether the school or School is where the alleged abuse took place.

Allegations against a teacher who is no longer teaching should be referred to the police. Historical allegations of abuse should also be referred to the police.

Where Rendcomb College is not the employer of an individual we still have responsibility to ensure allegations are dealt with appropriately and that they liaise with relevant parties (this includes supply teachers and volunteers).

The school will not cease to use a supply teacher due to safeguarding concerns, without finding out the facts and liaising with the LADO to determine a suitable outcome. The Head will discuss with the agency whether it is appropriate to suspend the supply teacher, or redeploy them to another part of the school, whilst they carry out their investigation.

Any member of staff or volunteer who does not feel confident to raise their concerns with the Head or Chair of Governors should contact the LADO directly (see contact details at the start of this policy).

The NSPCC [whistleblowing helpline](#) is available for staff who do not feel able to raise concerns regarding child protection failures internally.

The School has a legal duty to refer to the Disclosure and Barring Service anyone who has harmed, or poses a risk of harm, to a child, or if there is reason to believe the member of staff has committed one of a number of listed offences, and who has been removed from working (paid or unpaid) in regulated activity, or would have been removed had they not left. The DBS will consider whether to bar the person. If these circumstances arise in relation to a member of staff at our school, a referral will be made as soon as possible after the resignation or removal of the individual in accordance with advice from the LADO and/or HR. The DSL has a responsibility to inform Barring service. The School will also consider whether or not to refer a teacher whose employment ceases to the TRA.

You can contact the Disclosure and Barring Service via PO Box 3963, Royal Wootton Bassett, SN4 4HH, Tel: 03000 200 190 as well as to the Teacher Regulation Agency, Ground Floor, South, Cheylesmore House, 5 Quinton Road, Coventry, CV1 2WT. Tel: 0207 593 5393 Email: [misconduct.teacher@education.gov.uk](mailto:misconduct.teacher@education.gov.uk).

*Early Years Foundation Stage* – the Headmaster will inform Ofsted as soon as reasonably practicable and at the very latest within 14 days of the allegation being made of any allegation of serious harm or abuse by any person living working or looking after children at the premises (whether that allegation relates to harm or abuse committed on the premises or elsewhere).

## **Suspension**

Suspension will not be an automatic response to an allegation but will be considered where the circumstances warrant it, including:

- there is cause to suspect a child or other children at the college is or are at risk of significant harm
- the allegation warrants investigation by the police
- the allegation is so serious that it might be grounds for dismissal
- it is necessary to progress the investigation.

If suspension is deemed appropriate, the reasons and justifications will be recorded by the college and the individual will be notified of the reasons usually within one working day. Arrangements will be made for alternative accommodation (away from children) where a member of the boarding staff is suspended pending investigation.

## **Record keeping**

The college will keep a clear and comprehensive record of any allegation made, the action taken and decisions reached. However, any malicious allegations will be removed from personnel records entirely. The college will provide the accused person with a copy of the record following consultation with the appropriate agencies and agreement has been reached as to what information can be disclosed. The record will be kept confidentially on the personnel file.

## **Malicious allegations**

The Headmaster will consider whether to take disciplinary action where an allegation by a pupil is shown to be malicious or deliberately invented.

Those allegations which are determined to be unfounded, unsubstantiated or malicious will not be included in references.

## Timescales

It is in everyone's interest for cases to be resolved as quickly as possible consistent with a fair and thorough investigation.

### EARLY HELP

- Early help means providing support as soon as a problem emerges at any point in a child's life. Providing early help is more effective in promoting the welfare of children than reacting later. A child in need is defined as a child who is unlikely to achieve or maintain a reasonable level of health or development; or whose health and development is likely to be significantly or further impaired, without the provision of services; or a child who is disabled.
- Effective early help relies upon local agencies working together to identify children and families who would benefit from early help, to undertake an assessment of the need for early help and to provide targeted early help services to improve the outcomes for the child and prevent needs escalating to a point where intervention from children's services would be needed.
- Inter-agency assessments should take place when a child and family would benefit from coordinated support from more than one agency (e.g. education, health, housing, police). The assessment should be undertaken by a lead professional who should provide support to the child and family and coordinate the delivery of support services. The lead professional could be a teacher, family support worker, health visitor or GP and the decision about who should be the lead professional should be informed by the child and their family. Examples of support services include family and parenting programmes, assistance with health issues and help for problems relating to drugs and alcohol.
- For early help assessment to be effective: the assessment should be undertaken with the agreement of the child and their parents and should involve the child and the family as well as the professionals working with them; and professionals should be able to discuss concerns they may have about a child and family with a social worker in the local authority.
- If consent is not given for an early help assessment, the DSL should consider how the needs of the child might be met. If at any time it is considered that the child may be a child in need or that the child has suffered significant harm or is likely to do so, a referral to the local authority's children's service should be made immediately.
- Staff should discuss emerging problems and early help requirements with the DSL. If early help is appropriate, the DSL will generally lead on liaising

with other agencies and setting up an inter-agency assessment. Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead professional as appropriate.

- Any such cases should be kept under constant review and consideration given to a referral to local authority's children's service for assessment for statutory services if the child's situation does not appear to be improving or is getting worse. Referrals to Children's Social Care/Services for statutory assessments are made under the Children Act 1989:
- Section 17, Child in Need: a child in need is a child who is unlikely to achieve or maintain a reasonable level of health or development, or whose health and development is likely to be significantly or further impaired, without the provision of services. Local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare.
- Section 47, Child suffering or likely to suffer significant harm: local authorities, with the help of other organisations as appropriate, have a duty to make enquiries if they have reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm. Such enquiries enable them to decide whether they should take any action to safeguard and promote the child's welfare and must be initiated where there are concerns about maltreatment, including all forms of abuse and neglect, female genital mutilation or other so-called honour-based violence and extra-familial threats like radicalisation and sexual exploitation.
- There may be a need for children's social care and services and/or the police to provide immediate protection whilst an assessment or enquiries are carried out.
- The DSL is responsible for maintaining effective records of all such cases.
- Any child may benefit from early help, but all staff should be particularly alert to the potential need for early help for a child who :
  - is disabled and has specific additional needs
  - has special educational needs (whether or not they have a statutory Education, Health and Care Plan)
  - is a young carer
  - is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups
  - is frequently missing/goes missing from care or from home
  - is at risk of modern slavery, trafficking or exploitation
  - is at risk of being radicalised or exploited
  - 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 themselves
- has returned home to their family from care
- is a privately fostered child