


Authorisation and Amendment Record

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Safeguarding legislation and guidance

The following safeguarding legislation and guidance has been considered when drafting this policy and can be referenced for further details.

- ☐ *Working Together to Safeguarding Students 2018*
- ☐ *Working Together: Transitional Guidance 2018*
- ☐ *Keeping Students Safe in Education 2023*
- ☐ *What to do if you're worried a student is being abused 2015*
- ☐ *Section 157 of the Education Act 2002*
- ☐ *The Safeguarding Vulnerable Groups Act 2006*
- ☐ *The Teacher Standards 2012 (July 2011 (introduction updated June 2013, latest terminology update December 2021)*

Policy statement and principles

Safeguarding determines the actions that we take to keep students safe and protect them from harm in all aspects of their provider life. As a provider we are committed to safeguarding and promoting the welfare of all our students.

The actions that we take to prevent harm; to promote wellbeing; to create safe environments; to educate on rights, respect, and responsibilities; to respond to specific issues and vulnerabilities all form part of our safeguarding responsibilities.

We recognise our moral and statutory responsibility to safeguard and promote the welfare of all students.

We endeavour to provide a safe and welcoming environment where students are respected and valued.

We are alert to the signs of abuse and neglect and follow our procedures to ensure that students receive effective support, protection, and justice.

The procedures contained in this policy apply to all adults, staff, volunteers, and governors and are consistent with those of the local safeguarding partner arrangements.

Our core safeguarding principles are:

- ☐ safeguarding is everyone's responsibility
- ☐ Our responsibility to safeguard and promote the welfare of students is of paramount importance
- ☐ safer students 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
- ☐ The welfare of the student is paramount
- ☐ All students, regardless of age, gender, ability, culture, race, language, religion or sexual identity, have equal rights to protection
- ☐ All staff have an equal responsibility to act on any suspicion or disclosure that may suggest a student is at risk of harm
- ☐ Students and staff involved in student protection issues will receive appropriate support

Some areas, such as Health and Safety, are a specialist area of safeguarding and a separate lead for this area is in place.

Safeguarding processes are intended to put in place measures that minimise harm to students.

All students in our provision can talk to any member of staff about situations or to share concerns which are causing them worries. The staff will listen to the student, take their worries seriously and share the information with the safeguarding lead. In addition, we provide students with information of who they can talk to outside of provider both within the community and with local or national organisations who can provide support or help.

This policy is available on the Cirque website and copies are available from the office. It aims:

- ☐ To provide all staff with the necessary information to enable them to meet their student protection responsibilities and to signpost them to additional guidance
- ☐ To ensure consistent good practice
- ☐ To demonstrate our commitment regarding student protection to students, parents and other partners

Terminology

- ☐ **Safeguarding** and promoting the welfare of students refers to the process of protecting students from maltreatment, preventing the impairment of health or development, ensuring that students grow up in circumstances consistent with the provision of safe and effective care and taking action to enable all students to have the best outcomes.
- ☐ **Child protection** refers to the processes undertaken to protect students 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 provider, full time or part time, temporary or permanent, in either a paid or voluntary capacity.
- ☐ **DSL** refers to the designated safeguarding lead at Cirque and **DDSL** their deputies
- ☐ **Student** 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.

Roles and responsibilities

The DSL for student protection is Vanessa Jones	
DCST Early Help	01302 737777 (Out of Hours 01302 796000) childrenassessment@dcstrust.co.uk One Front Door https://www.doncaster.gov.uk/Eforms/SimpleEform/Boot/2370100
DCST Urgent Placements	01302 734110 fostering&adoption@dcstrust.co.uk
Nominated Student Protection Governor	Vesta Rying
The Headteacher	Vanessa Jones
The phone number for Cirque and to contact any member of the safeguarding team is: 01302 340107 and all named DSL staff will receive notification the call in and out of school hours	
You can also e mail: vanessa.jones@cirque.org.uk	
Contact Student’s Services (Referrals are made to the LA where the student lives)	

Local Authority	Contact Details
Doncaster Metropolitan Borough Council	01302 736000
Fire Service	0114 272 7202 (General Enquiries Number)
Doncaster Royal Infirmary	01302 366666
Yorkshire Water	0345 124 2424
Northern Power Grid	0800 011 3332
South Yorkshire Police	101
Prevent	Report concerns that a student may be at risk of radicalisation or involvement in terrorism, following the Prevent referral process The Department of Education has also set up a dedicated telephone helpline for staff and governors to raise concerns around Prevent (020 7340 7264)

Be prepared to refer directly (to the LA the student’s home address is in) or to the police if appropriate, if there is a risk of significant harm and the DSL or their Deputy is not available.

Local Authority Designated Officer (LADO)

The LADO Service manages allegations against individuals who work or volunteer with students. If you have a concern regarding someone who works with students please contact the LADO on **01302 734100**

Following a report of concerns the DSL must:

Using the relevant guidance for the LA, decide whether there are sufficient grounds for suspecting reason to refer to partner agencies. (One Front Door or similar)

The DSL will report concerns directly to the role school unless immediate action is required to protect a child, in which case the school will be informed as soon as practically possible. This will take the form of an initial telephone call informing them of the issue during which first actions will be discussed and agreed. This will be followed up by a safeguarding report in an appropriate timescale that will be sent by e-mail to the DSL at the host school. A direct referral may be made at the following address:

<https://www.doncaster.gov.uk/Eforms/SimpleEform/Boot/2370100>

Normally the DSL should try to discuss any concerns about a student’s welfare with the family and where possible to seek their agreement before making a referral. However, this should only be done when it will not place the student at increased risk or could impact a police investigation. The student’s views should also be taken into account.

If there are grounds to suspect a student is suffering, or is likely to suffer, significant harm or abuse the DSL must contact the appropriate safeguarding partner. If a student is in immediate danger and urgent protective action is required, the Police (dial 999) must be called. The DSL must also notify the LA safeguarding partner of the occurrence and what action has been taken

If the DSL feels unsure about whether a referral is necessary, they can phone first to discuss concerns.

If there is not a risk of significant harm, the DSL will either actively monitor the situation or consider offering early help.

Where there are doubts or reservations about involving the student’s family, the DSL should clarify with the LA safeguarding partner or the police whether the parents should be told about the referral and, if so, when and by whom. This is important in cases where the police may need to conduct a criminal investigation.

When a student is in need of urgent medical attention and there is suspicion of abuse the DSL or their Deputy should take the student to the accident and emergency unit at the nearest hospital, having first notified the relevant Local Authority safeguarding partner/team depending on which county the student lives in. The DSL should seek advice about what action the safeguarding partner will take and about informing the parents, remembering that parents should normally be informed that a student requires urgent hospital attention.

The exception to this process will be in those cases of known FGM where there is a mandatory requirement for the teacher to report directly to the police. The DSL should also be made aware.

The Designated Safeguarding Lead (DSL)

The designated safeguarding lead (DSL) takes **lead responsibility** for safeguarding and student protection (including online safety). The DSL has the status and authority 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 publicly available
- ☐ advising and supporting staff on child protection and safeguarding matters
- ☐ encouraging a culture of listening to students

- ☐ managing safeguarding referrals to students' social care, the police, or other agencies
- ☐ taking part in strategy discussions and inter-agency meetings
- ☐ liaising with the "case manager" and the designated officer(s) at the local authority where allegations are made against staff
- ☐ making staff aware of training courses and the latest local safeguarding arrangements available through the local safeguarding partner arrangements
- ☐ transferring the student protection file to a student's new provider
- ☐ undergoing training and receiving regular updates to maintain the knowledge and skills required to carry out the role, including Prevent awareness training.

The Deputy Designated Safeguarding Leads (DDSLs):

Are trained to the same level as the DSL and support the DSL with safeguarding matters as appropriate. In the absence of the DSL, the deputy DSL will carry out those functions necessary to ensure the ongoing safety and protection of students.

Students in Need (S17)

A Student in Need is defined under the Students Act 1989 as a student 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 student who is disabled. Local authorities are required to provide services for students in need for the purposes of safeguarding and promoting their welfare. A student who is deemed to be a Student in Need will have been assessed by Students' Social Care under section 17 of the **Students Act 1989**.

Students suffering or likely to suffer significant harm (S47)

Local authorities, with the help of other organisations as appropriate, have a duty to make enquires under section 47 of the **Students Act 1989** if they have reasonable cause to suspect that a student 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 student'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 extrafamilial threats like radicalisation and sexual exploitation. Should an investigation occur, then our involvement and any action may be determined on the advice given by the investigating agency.

Good practice guidelines

Good practice includes:

- ☐ treating all students with respect
- ☐ setting a good example by conducting ourselves appropriately
- ☐ involving students in decisions that affect them
- ☐ encouraging positive, respectful and safe behaviour among students
- ☐ being a good listener
- ☐ being alert to changes in students' behaviour and to signs of abuse, neglect and exploitation
- ☐ recognising that challenging behaviour may be an indicator of abuse
- ☐ reading and understanding our student protection policy, staff behaviour policy and guidance documents on wider safeguarding issues
- ☐ being aware that the personal and family circumstances and lifestyles of some students lead to an increased risk of abuse
- ☐ referring all concerns about a student's safety and welfare to the DSL, or, if necessary, directly to police or students' social care.
- ☐ staff working in line with the staff **Code of Conduct**.

All staff

A member of staff who is approached by a student should listen positively and try to reassure them. They cannot promise complete confidentiality and should explain that they may need to pass information to other professionals to help keep the student or other students safe. The degree of confidentiality should always be governed by the need to protect the student.

Additional consideration needs to be given to students with communication difficulties and for those whose preferred language is not English. It is important to communicate with them in a way that is appropriate to their age, understanding and preference.

All staff should know who the DSL is and who to approach if the DSL is unavailable.

Guiding principles – The Seven R’s

Receive	<ul style="list-style-type: none"> • Listen to what is being said, without displaying shock or disbelief • Accept what is said and take it seriously • Make a note of what has been said as soon as practicable
Reassure	<ul style="list-style-type: none"> • Reassure the student, but only so far as is honest and reliable • Do not make promises you may not be able to keep e.g. ‘I’ll stay with you’ or ‘everything will be alright now’ or ‘I’ll keep this confidential’ • Do reassure, for example, you could say ‘I believe you’, ‘I am glad you came to me’, ‘I am sorry this has happened’, ‘we are going to do something together to get help’
Respond	<ul style="list-style-type: none"> • Respond to the student only as far as is necessary for you to establish whether or not you need to refer this matter, but do not interrogate for full details • Do not ask ‘leading’ questions i.e. ‘did he touch your private parts?’ or ‘did she hurt you?’ Such questions may invalidate your evidence (and the student’s) in any later prosecution in court • Do not ask the student why something has happened. • Do not criticize the alleged perpetrator; the student may care about him/her, and reconciliation may be possible • Do not ask the student to repeat it all for another member of staff. Explain what you have to do next and whom you have to talk to. Reassure the student that it will be a senior member of staff
Report	<ul style="list-style-type: none"> • Share concerns with the DSL immediately.
	<ul style="list-style-type: none"> • If you are not able to contact your DSL or the Deputy DSL, and the student is at risk of immediate harm, contact the C-SPA or Police, as appropriate directly • If you are dissatisfied with the level of response you receive following your concerns, you should press for re-consideration

Record	<ul style="list-style-type: none"> • If possible, make some very brief notes at the time, and write them up as soon as possible • Keep your original notes on file • Record the date, time, place, person/s present and noticeable nonverbal behaviour, and the words used by the student. If the student uses sexual ‘pet’ words, record the actual words used, rather than translating them into ‘proper’ words • If appropriate, complete a body map to indicate the position of any noticeable bruising • Record facts and observable things, rather than your ‘interpretations’ or ‘assumptions’
Remember	<ul style="list-style-type: none"> • Support the student: listen, reassure, and be available • Complete confidentiality is essential. Share your knowledge only with appropriate professional colleagues • Get some support for yourself if you need it
Review (led by DSL)	<ul style="list-style-type: none"> • Has the action taken provided good outcomes for the student? • Did the procedure work? • Were any deficiencies or weaknesses identified in the procedure? Have these been remedied? • Is further training required?
<p>inform the DSL in person or by phone as soon as possible so that you are sure that they are aware.</p>	

Safeguarding Record Keeping

At Cirque, we record all safeguarding concerns electronically. As required, all concerns are distributed to the relevant stakeholders.

Dealing with disclosures

It is important that concerns are followed up and it the DSL’s responsibility to ensure that they are.

The member of staff should be informed by the DSL what has happened following a report being made. If they do not receive this information, they should seek it out.

If they have concerns that the disclosure has not been acted upon appropriately, they might inform the Principle or Safeguarding Governor of Cirque and/or may contact the Local Authority safeguarding partner.

Receiving a disclosure can be upsetting for the member of staff and providers should have a procedure for supporting them after the disclosure. This might include reassurance that they have followed procedure correctly and that their swift actions will enable the allegations to be handled appropriately.

In some cases, additional counselling might be needed, and staff should be encouraged to recognise that disclosures can have an impact on their own emotions.

If you are concerned about a student’s welfare but there is no disclosure

There will be occasions when staff may suspect that a student may be at risk. The student’s behaviour may have changed, they may display a level of confusion or distress, or physical signs may have been noticed. In these circumstances, staff will try to give the student the opportunity to talk and ask if they are OK or if they can help in any way.

Staff should record these early concerns electronically. If the student does reveal that they are being harmed, staff should follow the advice below. Following an initial conversation with the student, if the member of staff has concerns, they should discuss their concerns with the DSL.

The information may be part of a bigger picture that the DSL is already aware of.

Taking action & Reporting Concerns

Any student, in any family in any provider 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:

- ☐ report your safeguarding concern as soon as possible to the DSL, interrupt any meeting if necessary and ensure that any information is shared and logged by the end of the day, and straight away where possible
- ☐ complete a record of concern form (attached to the end of this policy if you do not have access to the system) and pass to the DSL
- ☐ do not promise confidentiality to a student
- ☐ do not start your own investigation
- ☐ do not contact home, the DSL will manage this
- ☐ Do not discuss the issue with colleagues, friends or family
- ☐ remember your mandatory FGM reporting duty for those with QTS
- ☐ in any emergency take the action necessary to help the student (including calling 999)

Notifying parents

Our focus is the safety and wellbeing of the student. Therefore, if the DSL believes that notifying parents could increase the risk to the student or exacerbate the problem, advice will first be sought from students' social care and/or the police before parents are contacted.

We will normally seek to discuss any concerns about a student with their parents. This must be handled sensitively, and the DSL/DDSL will be the person who will contact the parent in the event of a concern, suspicion or disclosure.

Referral to students' social care

The DSL will make a referral to students' social care if it is believed that a student is suffering or is at risk of suffering significant harm. The student (subject to their age and understanding) and the parents will be told that a referral is being made, unless to do so would increase the risk to the student.

Any member of staff may make a direct referral to students' social care if they genuinely believe independent action is necessary to protect a student.

Reporting directly to student protection agencies

Staff should follow the reporting procedures outlined in this policy. However, they may also share information directly with students' social care, police or the NSPCC if:

- ☐ the situation is an emergency and the designated safeguarding lead and their deputy are all unavailable
- ☐ they are convinced that a direct report is the only way to ensure the student's safety

- ☒ for any other reason they make a judgement that direct referral is in the best interests of the student.

Confidentiality and sharing information

All staff will understand that student protection issues warrant a high level of confidentiality. Staff should only discuss concerns with the DSL or deputy (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.

Student protection information will be stored in line with statutory requirements.

Information sharing will take place in a timely and secure manner and where:

- ☒ it is necessary and proportionate to do so; and
- ☒ the information to be shared is relevant, adequate and accurate.

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

Safeguarding forms and other written information will be kept in locked storage and any electronic information will be password protected and only made available to relevant individuals.

Student protection information will be stored separately from the student's provider file and Cirque file will be 'tagged' to indicate that separate information is held.

The DSL will normally obtain consent from the student and/or parents to share sensitive information within Cirque 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 student or parent to see student protection records, they will refer the request to the data protection officer and headteacher.

The GDPR and the Data Protection Act 2018 do not prevent provider staff from sharing information with relevant agencies, where that information may help to protect a student.

Our confidentiality and information-sharing policy is available to parents and students on request.

Students who may be particularly vulnerable

Some students may have an increased risk of abuse. Many factors can contribute to an increase in risk, including prejudice and discrimination, isolation, social exclusion, communication issues and reluctance on the part of some adults to accept that abuse can occur.

To ensure that our students receive equal protection, we will give special consideration to students who are:

- ☒ diagnosed with special educational needs and disabilities
- ☒ living away from home or in temporary accommodation
- ☒ living in chaotic and unsupportive home situations
- ☒ living transient lifestyles
- ☒ affected by parental substance misuse, domestic violence or parental mental health needs
- ☒ vulnerable to being bullied, or engaging in bullying
- ☒ vulnerable to discrimination and maltreatment on the grounds of race, ethnicity, religion,

- disability or sexuality
- ☒ using English as a second language
- ☒ at risk of sexual exploitation, female genital mutilation, forced marriage or being drawn into extremism.

This list provides examples of additionally vulnerable groups and is not exhaustive. Special consideration includes the provision of safeguarding information and resources in community languages and accessible formats for students with communication needs.

Mental health

Our staff see the students day in, day out. They know them well and are well placed to spot changes in behaviour that might indicate an emerging problem with the mental health and emotional wellbeing of students.

The balance between the risk and protective factors can also be disrupted when difficult events happen in students' lives. These include:

- ☒ loss or separation – resulting from death, parental separation, divorce, hospitalisation, loss of friendships (especially in adolescence), family conflict or breakdown that results in the student having to live elsewhere, being taken into care or adopted
- ☒ life changes – such as the birth of a sibling, moving to a new house or changing providers or during transition from primary to secondary provider, or secondary provider to sixth form
- ☒ traumatic events such as bereavement, abuse, domestic violence, bullying, violence, accidents, injuries or natural disaster

When concerns are identified, Cirque staff will provide opportunities for the student to talk or receive support within the environment.

Parents will be informed of the concerns and a shared way to support the student will be discussed. Where the needs require additional professional support referrals will be made to the appropriate team or service with the parent's agreement or student's if they are considered to be competent.

If staff have a mental health concern about a student that is also a safeguarding concern, immediate action will be taken, following our child protection policy and procedure and speaking to the designated safeguarding lead or a deputy.

All staff should also be aware that mental health problems can, in some cases, be an indicator that a student has suffered or is at risk of suffering abuse, neglect or exploitation.

Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem.

Staff however, are well placed to observe students 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 students 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 students' experiences, can impact on their mental health, behaviour and education.

The DfE has published advice and guidance on Preventing and Tackling Bullying, and Mental Health and Behaviour in Schools (which may also be useful for providers).

In addition, Public Health England has produced a range of resources to support secondary teachers to promote positive health, wellbeing and resilience among young people including its guidance Promoting students and young people's emotional health and wellbeing.

Its resources include social media, forming positive relationships, smoking and alcohol. See Rise Above for links to all materials and lesson plans.

Students with special educational needs and disabilities

We recognise that students with special educational needs (SEN) and disabilities can face additional safeguarding challenges.

Additional barriers can exist when recognising abuse and neglect in this group, including:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the student's disability without further exploration
- Students being more prone to peer group isolation than other students
- Communication barriers and difficulties in overcoming these barriers to disclose
- The potential for students with SEN and disabilities being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs

Recognising abuse

To ensure that our students 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 student by inflicting harm, for example by hitting them, or by failing to act to prevent harm, for example by leaving a small student home alone.

Abuse may be committed by adult men or women and by other students and young people.

At Cirque, we consider the various factors that have interplay with the life of any student about whom we have concerns and the level of influence that these factors have on their ability to be protected and remain free from harm.

The term 'abuse' is often used as an umbrella term. All staff should be aware of indicators of abuse and neglect so that they are able to identify cases of students who may be in need of help or protection. Abuse and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap with one another.

Abuse is a form of maltreatment of a student. Somebody may abuse or neglect a student by inflicting harm or by failing to act to prevent harm. Students may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. They may be abused by an adult or adults or by another student or students.

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 student. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a student.

Signs of physical abuse can include:

- injuries to parts of the body where accidents are unlikely, such as thighs, back, abdomen;
- respiratory problems from drowning, suffocation or poisoning;
- untreated or inadequately treated injuries;
- bruising which looks like hand or finger marks or caused by an implement;
- cigarette burns, human bites; or
- scarring, scalds and burns.

Emotional abuse

Emotional abuse is the persistent emotional maltreatment of a student such as to cause severe and adverse effects on the student's emotional development.

It may involve conveying to a student 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 student 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 students. These may include interactions that are beyond a student's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the student from participating in normal social interaction.

It may involve seeing or hearing the ill-treatment of another.

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

Domestic abuse

Domestic abuse represents one quarter of all violent crime. It is actual or threatened physical, emotional, psychological or sexual abuse. It involves the use of power and control by one person over another. It occurs regardless of race, ethnicity, gender, class, sexuality, age, religion, mental or physical ability. Domestic abuse can also involve other types of abuse.

We use the term domestic abuse to reflect that a number of abusive and controlling behaviours are involved beyond violence. Slapping, punching, kicking, bruising, rape, ridicule, constant criticism, threats, manipulation, sleep deprivation, social isolation, and other controlling behaviours all count as abuse.

Living in a home where domestic abuse takes place is harmful to students and can have a serious impact on their behaviour, wellbeing and understanding of healthy, positive relationships. Students who witness domestic abuse are at risk of significant harm and staff are alert to the signs and symptoms of a student suffering or witnessing domestic abuse.

Emotional abuse often occurs when the student sees or hears domestic abuse occurring in the home. The cross-government definition of domestic violence and abuse is any incident or pattern of incidents

of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members. The abuse can encompass but is not limited to: psychological; physical; sexual; financial; and emotional.

Exposure to domestic abuse and/or violence can have a serious, long lasting emotional psychological impact on students. In some cases, a student may blame themselves for the abuse or may have had to leave the family home as a result. Signs of emotional abuse tend to be behavioural rather than physical.

Sexual abuse

Sexual abuse involves forcing or enticing a student or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the student 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 students in looking at, or in the production of, sexual images, watching sexual activities, encouraging students to behave in sexually inappropriate ways, or grooming a student in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse.

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

The sexual abuse of students by other students is a specific safeguarding issue in education. Signs of sexual abuse displayed by students may include:

- Pregnancy
- sexually transmitted infection/diseases;
- pain/itching/bleeding/bruising/discharge to the genital area/anus/mouth;
- urinary infections;
- difficulty walking or sitting or standing;
- persistent sore throats; or
- stomach ache.

Neglect

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

Once a student 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 student 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 student's basic emotional needs. Signs of possible neglect include:

- the student seems underweight or is very small for their age, or their weight deteriorates;
- the student seems very overweight for their age;
- they are poorly clothed, with inadequate protection from the weather;
- they are often absent from provider for no apparent reason; or persistently arrive late; or

- they are regularly left alone, or in charge of younger brothers or sisters.

Child on Child abuse

We believe that all students have a right to attend education provision and learn in a safe environment. Students should be free from harm by adults and other students.

We recognise that students are capable of abusing other students and their peers and this will be dealt with under our student protection policy and in line with KCSIE (2023)

We are clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up

We will minimise the risk on child on child abuse by:-

Prevention

Taking a whole provider approach to safeguarding

Providing training to staff

Providing a clear set of values and standards, underpinned by our behaviour policy and pastoral support.

Engaging with specialist support and interventions.

Responding to reports of sexual violence and sexual harassment

All staff must be alert to possible indicators of safeguarding concerns which may indicate child on child abuse. This is most likely to include, but may not be limited to:

- bullying (including cyberbullying);
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm;
- sexual violence and sexual harassment;
- sexting (also known as youth produced sexual imagery);
- initiation/hazing type violence and rituals; and
- ‘upskirting’

Students making a report of sexual violence or sexual harassment including “upskirting” (which is a criminal offence) will be taken seriously, kept safe and be well supported.

If the report includes an online element staff will be mindful of the Searching, Screening and Confiscation: advice for providers (DfE 2018) guidance.

Staff taking the report will inform the DSL or the Deputy DSL immediately.

Staff taking a report will never promise confidentiality.

Parents or carers should usually be informed (unless this would put the student at greater risk).

Risk Assessment:-

Following a report, the DSL will make an immediate risk and needs assessment on a case-by-case basis.

The risk assessment will consider;

The victim, especially their protection and support.

The alleged perpetrator, their support needs and any discipline action.

All other students at the provider.

The victim and the alleged perpetrator sharing classes and space at provider. The risk assessment will be recorded and kept under review.

Where there has been other professional intervention and/or other specialist risk assessments, these professional assessments will be used to inform our approach to supporting and protecting students.

Action: The DSL will consider:-

The wishes of the victim.

The nature of the incident including whether a crime has been committed and the harm caused.

Ages of the students involved.

Developmental stages of the students.

Any power imbalance between the students. Any previous incidents.

Ongoing risks.

Other related issues or wider context.

Options:

Manage internally

Early Help intervention

Request for support to the C-SPA

Report to the police (generally in parallel with a request for support to the C-SPA)

Ongoing Response:

The DSL will manage each case individually and will ensure the risk assessment is reviewed regularly with relevant partner agencies, for example the Police and Students' Social Care.

Where there is a criminal investigation into a rape, assault by penetration or sexual assault, the alleged perpetrator should be removed from any classes they share with the victim.

The DSL will consider how best to keep the victim and perpetrator a reasonable distance apart on provider premises and on transport where appropriate.

Where a criminal investigation into a rape or assault by penetration leads to a conviction or caution, Cirque will take suitable action. In all but the most exceptional of circumstances, the rape or assault is likely to constitute a serious breach of discipline and may lead to the view that allowing the perpetrator to remain in the same provider or college would seriously harm the education or welfare of the victim (and potentially themselves and other students).

Where a criminal investigation into sexual assault leads to a conviction or caution, Cirque or college will, if it has not already, consider any suitable sanctions in light of their behaviour policy, which may include consideration of permanent exclusion. Where the perpetrator is going to remain at Cirque or college, the Headteacher should continue keeping the victim and perpetrator in separate classes and continue to consider the most appropriate way to manage potential contact on provider and college premises and transport. The nature of the conviction or caution and wishes of the victim will be especially important in determining how to proceed in such cases.

The victim, alleged perpetrator and any other students & adults affected will receive appropriate support and safeguards on a case-by-case basis.

Cirque will take any disciplinary action against the alleged perpetrator in accordance with Cirque behaviour policy.

Cirque recognises that taking disciplinary action and providing appropriate support are not mutually exclusive actions and will occur at the same time if necessary.

References:

Harmful Sexual Behaviour

The Brook Traffic Light Tool uses a traffic light system to categorise the sexual behaviours of young people and is designed to help professionals:

- Make decisions about safeguarding students and young people
- Assess and respond appropriately to sexual behaviour in students and young people
- Understand healthy sexual development and distinguish it from harmful behaviour
- By categorising sexual behaviours, Cirque can work with other agencies to the same standardised criteria when making decisions and can protect students and young people with a multi-agency approach.

Cirque recognises that it is vital that professionals agree on how behaviours should be categorised regardless of culture, faith, beliefs, and their own experiences or values.

Anti-Bullying/Cyberbullying

Our provider policy on anti-bullying is set out in a separate document and acknowledges that to allow or condone bullying may lead to consideration under student protection procedures.

We keep a record of known bullying incidents which is shared with and analysed by the governing body. All staff are aware that students with SEND and/or differences/perceived differences are more susceptible to being bullied/victims of student abuse.

When there is 'reasonable cause to suspect that a student is suffering, or is likely to suffer, significant harm' a bullying incident should be addressed as a student protection concern. If the anti-bullying procedures are seen to be ineffective, the Headteacher and the DSL will also consider student protection procedures.

PSHE education regularly provides opportunities for students to understand bullying is wrong, its impact and how to deal with it.

Online Safety

Cirque has a digital safety policy which explains how we try to keep students safe in provider and how we respond to online safety incidents.

Students increasingly use electronic equipment on a daily basis to access the internet, share and view content and images via social media sites such as Facebook, twitter, Instagram, snapchat and voodoo and for online gaming.

Some adults and other students use these technologies to harm students. The harm might range from sending hurtful or abusive texts or emails, to grooming and enticing students to engage in extremist or sexual behaviour involving webcam photography or face-to-face meetings.

Students may also be distressed or harmed by accessing inappropriate material such as pornographic websites or those which promote extremist behaviour, criminal activity, suicide or eating disorders.

Students are taught about online safety throughout the curriculum and all staff receive online safety training which is regularly updated. Cirque's digital safety coordinator is Vanessa Jones.

Racist Incidents

Repeated racist incidents or a single serious incident may lead to consideration under student

protection procedures. We keep a record of racist incidents, however, at the time this document version was completed, no incidents have been recorded.

One Chance Rule

All staff are aware of the 'One Chance' Rule' in relation to forced marriage, FGM and HBA. Staff recognise they may only have one chance' to speak to a student who is a potential victim and have just one chance to save a life.

Honour Based Abuse (HBA) (including Female Genital Mutilation (FGM), Forced Marriage (FM) and breast flattening)

Cirque is aware that if the victim is not offered support following disclosure that the 'One Chance' opportunity may be lost. Therefore, all staff are aware of their responsibilities and obligations when they become aware of potential forced marriage, FGM and HBA cases.

HBA includes all incidents or crimes which have been committed to protect or defend the honour of the community and/or the family, and commonly involve practices such as FGM, forced marriage and/or breast flattening.

Abuse often involves a wider network of family or community pressure and therefore it is important to be aware of this dynamic and consider risk factors when deciding on action.

If staff have a concern that a student may be at risk of Honour Based Abuse, they should alert their DSL immediately.

Female Genital Mutilation (FGM)

FGM is abuse that encompasses all procedures involved in the partial or total removal of female external genitalia and is illegal in the UK. Whilst all staff should speak to the DSL (or deputy DSL) with regards to any concerns about FGM, there is a specific legal duty on teachers under the FGM Act (2003) to report FGM. If a teacher, in the course of their work in the profession, discovers that an act of FGM appears to have been carried out on a girl under the age of 18, it is mandatory that the teacher must report this to the police using the telephone number 101.

Forced Marriage (FM)

Forcing a person into marriage is a crime in England and Wales. FM is one entered into without the full and free consent of one or both parties and where violence, threats or any form of coercion is used to cause a person to enter into a marriage. The FM Unit provides more guidance and Multi- Agency guidelines, which focuses on the role of providers.

Breast Flattening

Breast flattening, also known as breast ironing, is the pounding and massaging of a pubescent girl's breasts, using hard or heated objects, to try to make them stop developing or disappear. It is typically carried out by the girl's mother, who will say she is trying to protect the girl from sexual harassment and rape to prevent early pregnancy that would tarnish the family name, or to allow the girl to pursue education, rather than be forced into early marriage. See Annex A of KCSIE for further details.

Behavioural signs of abuse and neglect

If a student is being abused, their behaviour may change in a number of ways. For example, they may:

- behave aggressively or be disruptive, act out, demand attention and require more discipline than

other students;

- become angry or disinterested and/or show little creativity;
- seem frightened of certain adults;
- become sad, withdrawn or depressed;
- have trouble sleeping;
- become sexually active at a young age;
- exhibit inappropriate sexual knowledge for their age or sexualised behaviour in their play with other students;
- refuse to change for gym or participate in physical activities;
- develop eating disorders;
- self-harm;
- refuse to attend provider or run away from home;
- lack confidence or have low self-esteem; or
- use drugs or alcohol.

Signs of abuse or neglect manifested by the parents or other responsible adult

- places unrealistic expectations on the student, i.e. demands a level of academic or physical performance of which they are not capable;
- offers conflicting or unconvincing explanation of any injuries to the student;
- appears indifferent to, or overtly rejects, the student;
- denies existence of or blames the student for the student's problems at home or at provider;
- sees and describes the student as entirely worthless, burdensome or in another negative light;
- refuses offers of help for the student's problems; or
- is isolated physically/emotionally.

Grooming

Grooming is the process by which an individual prepares a student, significant adults and the environment for abuse of this student. Students and young people can be groomed online or in the real world, by a stranger or by someone they know. Groomers may be male or female, of any gender identity. They could be any age. Many students and young people do not understand that they have been groomed, or that what has happened is abuse. The signs of grooming are not always obvious. Groomers will also go to great lengths not to be identified.

Students may:

- be very secretive, including about what they are doing online;
- have older boyfriends or girlfriends;
- go to unusual places to meet friends;
- have new things such as clothes or mobile phones that they can't or won't explain;
- have access to drugs and alcohol;
- go missing from home or provider;
- display behavioural changes;
- have sexual health issues; or
- present as suicidal, self/harming, feeling depressed, unworthy.

In older students, signs of grooming can easily be mistaken for 'normal' teenage behaviour, but you may notice unexplained changes in behaviour or personality, or inappropriate sexual behaviour for their age. See the NSPCC website for further information about grooming.

Signs of grooming and/or online abuse

A student may be experiencing abuse online if they:

- spend lots, much more, or much less time online, texting, gaming or using social media;
- are withdrawn, upset or outraged after using the internet or texting;
- are secretive about who they're talking to and what they're doing online or on their mobile phone; and/or
- have lots of new phone numbers, texts or e-mail addresses on their mobile phone, laptop or tablet.

Signs of grooming manifested by sex offenders

It is important to remember that not all sex offenders will exhibit the signs listed below and if an individual exhibits some or all of these signs, it does not mean that they are a sex offender:

- Overly affectionate behaviour with a student;
- Affording special attention or preferential treatment to a student;
- Excessive time spent alone with a student outside of the classroom/provider;
- Frequently spending time with a student in private or isolated areas;
- Transporting a student to or from the provider;
- Making friends with a student's parents and visiting their home;
- Acting as a particular student's confidante;
- Giving small gifts, money, toys, cards, letters to a student;
- Using texts, telephone calls, e-mails or social networking sites to inappropriately communicate with a student; and/or
- Flirtatious behaviour or making suggestive remarks or comments of a sexual nature around a student.

Modus operandi of institutional grooming

- Target vulnerable victim: Perpetrators target victims who are vulnerable, isolated, insecure and/or have greater emotional needs.
- Gain victim's trust: Offenders may allow a student to do something (e.g. eat ice cream, stay up late, view pornography) which is not normally permitted by the student's parents or Cirque in order to foster secrecy.
- Gain the trust of others: Institutional offenders are often popular with students and parents, successfully grooming not only the victim but also other members of the victim's family and the community at large.
- Filling a need/becoming more important to the student: This can involve giving gifts, rewards, additional help or advice, favouritism, special attention and/or opportunities for special trips or outings.
- Isolating the student: The perpetrator may encourage dependency and subtly undermine the victim's other relationships with friends or family members.
- Sexualising the relationship: This can involve playful touches, tickling and hugs. It may involve adult jokes and innuendo or talking as if adults, for example about marital problems or conflicts.
- Maintaining control and secrecy: Offenders may use their professional position to make a student believe that they have no choice but to submit to the offender.

Radicalisation, Extremism and Terrorism

The Prevent Duty for England and Wales (2015) under section 26 of the Counter-Terrorism and Security Act 2015 places a duty on education and other student's services to have due regard to the need to prevent people from being drawn into terrorism.

Extremism is defined 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. We

also include in our definition of extremism calls for the death of members of our armed forces, whether in this country or overseas.

Terrorism is an action that endangers or causes serious violence to a person/people; causes serious violence to a person/people; causes serious damage to property; or seriously interferes with an electronic system. The use or threat **must** be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

Some students are at risk of being radicalised; adopting beliefs and engaging in activities which are harmful, criminal or dangerous. This can happen both online and offline.

Cirque is clear that exploitation of vulnerable students and radicalisation should be viewed as a safeguarding concern and follows the Department for Education guidance for providers and student care providers on preventing students and young people from being drawn into terrorism.

Cirque seeks to protect students and young people against the messages of all violent extremism including, but not restricted to, those linked to Islamist ideology, or to Far Right / Neo Nazi / White Supremacist ideology, Irish Nationalist and Loyalist paramilitary groups, and extremist Animal Rights movements.

Cirque staff receive training to help identify early signs of radicalisation and extremism.

Cirque provides an environment that enables students to discuss issues of religion, ethnicity and culture and Cirque follows the DfE advice Promoting Fundamental British Values as part of SMSC (spiritual, moral, social and cultural education) in Providers (2014).

Cirque's governors, the Headteacher and the Designated Safeguarding Lead (DSL) will assess the level of risk within Cirque and put actions in place to reduce that risk. Risk assessment may include, due diligence checks for external speakers and private hire of facilities, anti-bullying policy and other issues specific to our profile, community and philosophy.

When any member of staff has concerns that a student may be at risk of radicalisation or involvement in terrorism, they should speak with the DSL in the first instance.

They should then follow the safeguarding procedures and refer cases following the Prevent referral process and use the Prevent referral form. If the matter is urgent then Police must be contacted by dialling 999. In cases where further advice from the Police is sought dial 101 or speak to the Prevent Supervisor for the relevant LA.

The Department for Education has also set up a dedicated telephone helpline for staff and governors to raise concerns around Prevent (020 7340 7264).

Indicators of vulnerability to radicalisation

Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism leading to terrorism.

Extremism is defined by the Crown Prosecution Service as:

- The demonstration of unacceptable behaviour by using any means or medium to express views which:
- Encourage, justify or glorify terrorist violence in furtherance of particular beliefs;
- Seek to provoke others to terrorist acts;
- Encourage other serious criminal activity or seek to provoke others to serious criminal acts; or
- Foster hatred which might lead to inter-community violence in the UK.

There is no such thing as a “typical extremist”: those who become involved in extremist actions come from a range of backgrounds and experiences, and most individuals, even those who hold radical views, do not become involved in violent extremist activity.

Students may become susceptible to radicalisation through a range of social, personal and environmental factors - it is known that violent extremists exploit vulnerabilities in individuals to drive a wedge between them and their families and communities. It is vital that provider staff are able to recognise those vulnerabilities.

Indicators of vulnerability include:

- Identity Crisis – the student / student is distanced from their cultural / religious heritage and experiences discomfort about their place in society;
- Personal Crisis – the student / student may be experiencing family tensions; a sense of isolation; and low self-esteem; they may have dissociated from their existing friendship group and become involved with a new and different group of friends; they may be searching for answers to questions about identity, faith and belonging;
- Personal Circumstances – migration; local community tensions; and events affecting the student
 - / student’s country or region of origin may contribute to a sense of grievance that is triggered by personal experience of racism or discrimination or aspects of Government policy;
- Unmet Aspirations – the student / student may have perceptions of injustice or a feeling of failure,
- Experiences of Criminality – which may include involvement with criminal groups, imprisonment, and poor resettlement / reintegration;
- Special Educational Needs and Disability – students / students may experience difficulties with social interaction, empathy with others, understanding the consequences of their actions and awareness of the motivations of others.

However, this list is not exhaustive, nor does it mean that all young people experiencing the above are at risk of radicalisation for the purposes of violent extremism.

More critical risk factors in all of the above could include:

- Being in contact with extremist recruiters;
- Accessing violent extremist websites, especially those with a social networking element;
- Possessing or accessing violent extremist literature;
- Using extremist narratives and a global ideology to explain personal disadvantage;
- Justifying the use of violence to solve societal issues;
- Joining or seeking to join extremist organisations;
- Significant changes to appearance and / or behaviour;
- Experiencing a high level of social isolation resulting in issues of identity crisis and / or personal crisis.

The Department of Education guidance [The Prevent Duty](#) can be accessed via this link.

Signs of grooming for radicalisation

All providers and colleges are subject to a duty under section 26 of the Counter Terrorism and Security Act 2015, in the exercise of their functions, to have “due regard to the need to prevent people from being drawn into terrorism”. This duty is known as the Prevent duty. For more information, please see the Preventing Extremism and Radicalisation Policy and Annex A of KCSIE.

There is no single way of identifying whether a student is likely to be susceptible to an extremist

ideology. Background factors combined with specific influences such as family and friends may contribute to a student's vulnerability. Similarly, radicalisation can occur through many different methods (such as social media or the internet) and settings (such as within the home).

As with other safeguarding risks, staff should be alert to changes in student's behaviour, which could indicate that they may be in need of help or protection. Staff should use their judgement in identifying students who might be at risk of radicalisation and act proportionately which may include the designated safeguarding lead (or deputy) making a Prevent referral. There are no known definitive indicators that a young person is vulnerable to radicalisation, but there are a number of signs that together increase their risk of being groomed in this way.

Signs of vulnerability include:

- Underachievement;
- Being in possession of extremist literature;
- Poverty;
- Social exclusion;
- Traumatic events;
- Global or national events;
- Religious conversion;
- Change in behaviour;
- Extremist influences;
- Conflict with family over lifestyle;
- Confused identity;
- Victim or witness to race or hate crimes; and
- Rejection by peers, family, social groups.

Student Criminal Exploitation (CCE) and Serious Violence

CCE is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a student into any criminal activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial or other advantage of the perpetrator or facilitator and/or (c) through violence or the threat of violence.

The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact; it can also occur through the use of technology. CCE can include students being forced to work in cannabis factories, forced to shoplift or pickpocket, or to threaten other young people.

CCE also involves students and young people being coerced into moving drugs or money across the country; this is commonly referred to as County Lines.

County Lines usually occurs through engaging students into gangs and using them to carry money or drugs from urban areas to suburban and rural areas, market and seaside towns. Further information on the signs of a student's involvement in county lines is available in guidance published by the Home Office.

All staff should be aware of indicators which may signal that students are at risk from, or are involved with, serious violent crime. These can include increased absence from provider; a change in friendships or relationships with older individuals or groups; a significant decline in performance; signs of self-harm or a significant change in wellbeing; or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that students have been approached by, or are involved with, individuals associated with criminal networks or gangs.

More information can be found in KCSIE (2020), in the Home Office’s ‘Preventing youth violence and gang involvement’ and its ‘Criminal exploitation of students and vulnerable adults: county lines guidance’.

Contextual Safeguarding

Contextual Safeguarding is an approach to understanding, and responding to, young people’s experiences of significant harm beyond their families. It recognises that the different relationships that young people form in their neighbourhoods, providers and online can feature violence and abuse. Parents and carers have little influence over these contexts, and young people’s experiences of extra-familial abuse can undermine parent-student relationships.

The contextual safeguarding approach says that student’s social care practitioners, student protection systems and wider safeguarding partnerships need to engage with individuals and sectors who do have influence over/within extra-familial contexts, and recognise that assessment of, and intervention with, these spaces are a critical part of safeguarding practices.

Contextual Safeguarding, therefore, expands the objectives of student protection systems in recognition that young people are vulnerable to abuse beyond their front doors.

This also includes the risk of abuse occurring in or outside of provider.

Student Sexual Exploitation (CSE)

CSE is a form of abuse and occurs where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a student into sexual 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 students or adults.

The abuse can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence. Victims can be exploited even when activity appears consensual and it should be noted exploitation as well as being physical can be facilitated and/or take place online. CSE can affect any student or young person (male or female) under the age of 18 years, including 16-and 17-year olds, who can legally consent to have sex.

It can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity and may occur without the student or young person’s immediate knowledge (e.g. through others copying videos or images they have created and posted on social media).

The above CCE indicators can also be indicators of CSE, as can:

- students who have older boyfriends or girlfriends; and
- students who suffer from sexually transmitted infections or become pregnant.

For more information, see Student Sexual Exploitation: Guide for Practitioners

Students Missing In Education

All staff should be aware that students going missing, particularly repeatedly, can act as a vital warning sign of a range of safeguarding possibilities. This may include abuse and neglect, which may include

sexual abuse or exploitation and can also be a sign of student criminal exploitation including involvement in county lines. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation or risk of forced marriage.

Early intervention is necessary to identify the existence of any underlying safeguarding risk and to help prevent the risks of a student going missing in future. Staff should be aware of their provider's unauthorised absence and their local authority's students missing from education procedures.

Students Missing Out on Education

The vast majority of students engage positively with their provision and attend regularly. However, in order to flourish, some students require a modified timetable to support a return to full time education. It is recognised that students accessing a reduced or modified timetable may have additional vulnerabilities. Ofsted refer to these as Students Missing Out On Education (PMOOE), because they are not accessing their education in the 'usual way'.

In such cases, Cirque will keep the placement and timetable under review and involve parents in the review. Reviews will be frequent enough to provide assurance that the modified timetable is achieving its objectives and that the student is benefitting from it;

Cirque will monitor and track students attending alternative provision to ensure that the provision meets the needs of the student.

Cirque will comply with regular data returns requested by the Local Authority, regarding all students, of statutory school age on a reduced or modified timetable.

Cirque's leadership will report to governors information regarding the use and effectiveness of the modified timetables.

Cirque Attendance and Behaviour

Additional policies and procedures are in place regarding attendance and behaviour.

Cirque recognises that absence from provision may be indicators of abuse and neglect, including the exploitation of students. The DSL will regularly liaise with members of staff to ensure risk is identified and appropriate intervention is in place to protect students from harm.

Staff will be alert to signs of students at risk of travelling to conflict zones, female genital mutilation and forced marriage.

Restrictive Physical Intervention

We acknowledge that staff must only ever use physical intervention as a last resort, when a student is at immediate risk of harming him/herself or others, and that at all times it must be the minimal force necessary to prevent injury to another person. Such events should be fully recorded and signed by a witness.

Staff who are likely to need to use physical intervention will be appropriately trained in 'CPI' (crisis prevention institute) techniques using the Team Teach approach.

Staff understand that physical intervention of a nature which causes injury or distress to a student may be considered under student protection and/or disciplinary procedures.

We recognise that touch is not appropriate in the context of working with students, and all staff have been given 'Safe Practice' guidance to ensure they are clear about their professional boundaries.

When applying disciplinary measures such as physical intervention or isolation for students with SEND Cirque will consider the risks, given the additional vulnerabilities of these students.

Students with family members in prison

Providers should be aware if they have any students or young people on their roll whose parent or close family member is in prison and provide additional support. Approximately 200,000 students in England and Wales have a parent sent to prison each year. These students are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. NICCO provides information designed to support professionals working with offenders and their students, to help mitigate negative consequences for those students.

Students who have a social worker

Students may need a social worker due to safeguarding or welfare needs. Students may need this help due to abuse, neglect and complex family circumstances. A student'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. Local authorities should share the fact a student has a social worker and inform providers whether the student is subject to a Student in Need (s17) or Student Protection (s47) Plan. The DSL should attend all 'plan reviews'.

Where students need a social worker, this should inform provider decisions about safeguarding (for example, responding to unauthorised absence or missing education Student suffering or likely to suffer significant harm Students in need Early help Safeguarding and Student Protection Policy and Procedure 23 September 2020 where there are known safeguarding risks) and about promoting welfare (for example, considering the provision of pastoral and/or academic support, alongside action by statutory services).

Youth produced sexual imagery / 'Sexting'

Whilst many professionals refer to the issue as 'sexting', there is no clear definition of 'sexting'. According to research, many professionals consider sexting to be 'sending or posting sexually suggestive images, including nude or semi-nude photographs, via mobiles or over the internet.' Yet, recent NSPCC research has revealed that when students are asked 'What does sexting mean to you?' they are more likely to interpret sexting as 'writing and sharing explicit messages with people they know.'

Similarly, a recent Student Line survey has revealed that many parents think of sexting as flirty or sexual text messages, rather than images. This policy only covers the sharing of sexual imagery by students. Possessing, creating, sharing and distributing sexual photos and videos of under-18s is illegal, and therefore causes the greatest complexity for providers (amongst other agencies) when responding. It also presents a range of risks which need careful management.

On this basis, this policy introduces the phrase 'youth produced sexual imagery' and uses this instead of 'sexting'.

This is to ensure clarity about the issues this advice addresses.

What is youth produced sexual imagery?

'Youth produced sexual imagery' best describes the practice because:

- 'Youth produced' includes students sharing images that they, or another student, have created of themselves.
- 'Sexual' is clearer than 'indecent'. A judgement of whether something is 'decent' is both a value judgement and dependent on context.
- 'Imagery' covers both still photos and moving videos (and this is what is meant by reference to imagery throughout the policy).

What types of incidents are covered by this policy?

Yes:

- A student creates and shares sexual imagery of themselves with a peer (also under the age of 18).
- A student shares sexual imagery created by another student with a peer (also under the age of 18) or an adult.
- A student is in possession of sexual imagery created by another student.

No:

- The sharing of sexual imagery of students by adults as this constitutes student sexual abuse and providers should always inform the police.
- Students sharing adult pornography or exchanging sexual texts which do not contain imagery.
- Sexual imagery downloaded from the internet by a student.
- Sexual imagery downloaded from the internet by a student and shared with a peer (also under the age of 18) or an adult.

This is in accordance with the new advice Sexting in providers and colleges: responding to incidents and safeguarding young people, which has been published by the UK Council for Student Internet Safety.

All members of staff (including non-teaching staff) should be aware of how to recognise and refer any disclosure of incidents involving youth produced sexual imagery. Disclosure about youth produced sexual imagery can happen in a variety of ways. The student affected may inform a class teacher, the DSL in provider, or any member of Cirquestaff. They may report through an existing reporting structure, or a friend or parent may inform someone in provider or a colleague, or inform the police directly. Any direct disclosure by a student should be taken very seriously. A student who discloses they are the subject of sexual imagery is likely to be embarrassed and worried about the consequences. It is likely that disclosure in provider is a last resort and they may have already tried to resolve the issue themselves.

Handling incidents

All incidents involving youth produced sexual imagery should be responded to in line with this policy. When an incident involving youth produced sexual imagery comes to a member of staff's attention:

- The incident should be referred to the DSL as soon as possible;
- The DSL should hold an initial review meeting with appropriate provider staff;
- The DSL will follow the procedures and guidance set out in 'Sexting in providers and colleges: responding to incidents and safeguarding young people';
- There should be interviews with the students involved (if appropriate);
- Parents of each student should be informed at an early stage and involved in the process unless there is good reason to believe that involving parents would put the student at greater risk of harm and jeopardise any police/social care investigation; and
- At any point in the process, if there is a concern that a student has been harmed or is at risk of harm, a referral should be made to Students' Social Care and/or the police immediately.

Private fostering

What is private fostering? Private fostering is when a student or young person under 16 years old (or 18 if they have a disability) is looked after for 28 days or more by someone who is not a close relative, legal guardian or person with parental responsibility. Close relatives only include parents, stepparents, aunts, uncles and grandparents. It is not private fostering if the student is 'looked after' by the Local Authority (also known as 'in care' and which includes placement in residential care, with an approved foster carer or a 'kinship' carer).

Private fostering occurs in all cultures, including British culture, and students may be privately fostered at any age. Examples of private fostering situations include:

- students and young people living apart from their families for a variety of reasons e.g. a parent is ill, has had to temporarily move for work or there has been conflict, separation or divorce;
- students whose parents work or study elsewhere in the UK or overseas;
- students sent to this country by their parents for education and health care;
- young people living with the family of a boyfriend or girlfriend; and
- students on holiday exchanges. People become private foster carers for all sorts of reasons.

Private foster carers can be a family friend, or someone who is willing to care for the student of a family they do not know, for example host families supplied by a Guardianship Organisation.

If a host family is going to be caring for a student for 28 days or longer, they are classed as private foster carers and the Local Authority must be notified. Why does your Local Authority Students' Services need to know? By law, the Local Authority must be informed about all private fostering situations. The student's parents, private foster carers and anyone else involved in the arrangement or who becomes aware of the arrangement, e.g. guardianship agencies, providers or health professionals are legally required to inform Students' Services. Students' Services have a legal duty to make sure all private fostering arrangements are safe for the student. Once informed of the arrangement, they will check the suitability of private foster carers, make regular visits to the student and ensure advice,

help and support is available when needed. Where a member of staff becomes aware that a student may be in a private fostering arrangement, s/he should raise this with the DSL.

Where Students' Social Care are not already aware of the circumstances, the DSL should make a referral to them.

Timescales for informing the Local Authority:

- ☐ The student is not yet living with the private foster carers Within 6 weeks beforehand
- ☐ The student will move in with the private foster carers within 6 weeks Immediately
- ☐ The student is already living with the private foster carers. Immediately

Looked After Students

A student who is being 'looked after' by their Local Authority is usually known as a 'Student in Care' or a 'Looked After Student'. They might be living with foster parents or at home with their parents under an Interim Care Order granted to social care, or in residential students' homes, or other residential settings like providers or secure units.

A student who is adopted is not a Looked After Student. Occasionally, students are placed into Local Authority foster care under an Interim Care Order when an adoption breaks down and the adoptive

parents relinquish the student.

Once a Full Care Order is agreed, the student remains on long term foster care. The adoptive parents may or may not have continued contact with the student, depending on the situation and the emotional impact on the student. An Interim Care Order will remain in place until care proceedings are concluded (within 26 weeks in most authorities). At the conclusion of care proceedings in any situation, the student will either stay in long term foster care (under a Full Care Order) until they reach the age of 18 years, return to their parents (usually under a Supervision Order), reside with other family members/friends (usually under a Special Guardianship Order), or in some cases be adopted. In all of the latter situations, it is most usual for parents to have agreed contact arrangements with their student, most commonly three times per year.

A student may also have been placed in care voluntarily by their parents who are struggling to manage their students' behaviour, or meet their student's needs due to their own illnesses or disabilities (under section 20, Students Act 1989). In these cases, rehabilitation will always be the aim, but if this is not possible, the Local Authority will apply for an Interim Care Order and finally a Full Care Order. Usually, these parents will have continued contact with their student.

As a result of their experiences both before and during care, Looked After Students are at greater risk than their peers; they are, for example, four times more likely than their peers to have a mental health difficulty. Providing a secure, caring environment and enabling such 6 Section 67(1) of the Students Act 1989 amended by the students Act 2004) and the Students (Private Arrangements for Fostering) Regulations 2005 Safeguarding and Student Protection Policy and Procedure 35 September 2020 students to develop strong, trusting and stable relationships with professionals is critical to their safety and wellbeing.

The LAC lead ensures that staff receive training on Looked After Students, including on the reasons students become looked after, their legal status, the support that staff can provide to keep such students safe and the ways in which they can maximise educational stability for Looked After Students.

The Looked After Students Lead, in collaboration with the DSL, (a) is responsible for ensuring that any looked after students are adequately supported by staff in provider; (b) has contact details of the student's social worker and the name and contact details of the Virtual Provider Head for students in care;

(c) ensures that relevant staff members have sufficient information about the student's looked after legal status and care arrangements; (d) works with the Virtual Provider Head to discuss how staff can best support the progress of Looked After Students in Cirque and meet the needs in the student's Personal Education Plan; and (e) attends Looked After Students reviews and other meetings they are required to attend.

Child on child abuse

All staff should be alert to the risk of child-on-child abuse and understand their role in preventing, identifying and responding to it. Staff should know that students are capable of abusing their peers. They should never dismiss abusive behaviour as a normal part of growing up, 'banter' or 'just having a laugh', and should not develop high thresholds before Safeguarding and Student Protection Policy and Procedure 38 September 2020 taking action. Abuse is abuse and child on child abuse should be taken as seriously as abuse by adults.

What is child on child abuse?

For these purposes, child on child abuse is any form of abuse perpetrated by a student towards another student. It can take many different forms, including, but not limited to, serious bullying

(including cyber-bullying), relationship abuse, domestic violence, student sexual exploitation, youth and serious youth violence, ‘upskirting’ (see below), harmful sexual behaviour (see below) and gender-based violence.

These categories of abuse rarely take place in isolation and often indicate wider safeguarding concerns. For example, a teenage girl may be in a sexually exploitative relationship with a teenage boy who is himself being physically abused by a family member or by older boys.

Equally, while students who abuse may have power over those who they are abusing, they may be simultaneously powerless to others. Youth produced sexual imagery can but does not always constitute abusive behaviour. All incidents involving youth produced sexual imagery should be responded to with reference to our policy and in accordance with this policy (see above).

What role does gender play?

Students of all gender identities can both perpetrate and be the victim of child on child abuse, but this often manifests itself differently; girls seem to be at greater risk of sexual assault and/or exploitation, whereas boys seem to be at greater risk of physical gang-related violence and serious youth violence.

When does behaviour become abusive?

It can be difficult to distinguish between abusive behaviour, which should be dealt with in accordance with the procedure set out below, and behaviour which does not constitute abuse, such as low-level bullying (where our Anti-Bullying Policy should be followed) or age-appropriate sexual experimentation.

Factors which may indicate that behaviour is abusive include: a) where it is repeated over time and/or where the perpetrator intended to cause serious harm; b) where there is an element of coercion or pre-planning; and c) where there is an imbalance of power, for example, as a result of age, size, social status or wealth. This list is not exhaustive, and staff should always use their professional judgment and discuss any concerns with the DSL.

How can I identify victims of child-on-child abuse?

Identifying child on child abuse can be achieved by being alert to students’s well-being and to general signs of abuse. Signs that a student may be suffering from child-on-child abuse overlap with those relating to other types of abuse – see indicators of abuse, earlier in this document.

Signs can include:

- a) failing to attend provider, disengaging from classes or struggling to carry out provider related tasks to the standard you would ordinarily expect.
- b) physical injuries.
- c) having difficulties with mental health and/or emotional wellbeing.
- d) becoming withdrawn, shy, experiencing headaches, stomach aches, anxiety, panic attacks, suffering from nightmares or lack of sleep or sleeping too much.
- e) drugs and/or alcohol use.
- f) changes in appearance and/or starting to act in a way that is not appropriate for the student’s age.

This list is not exhaustive and the presence of one or more of these signs does not necessarily indicate abuse.

Are some students particularly vulnerable to abusing or being abused by their peers?

Any student can be affected by child-on-child abuse and staff should be alert to signs of such abuse amongst all students. Research suggests that:

- a) child on child abuse is more prevalent amongst students aged 10 and older, although it also affects younger students, including by way of harmful sexual behaviour.
- b) students who are particularly vulnerable to abuse or to abusing others include those who have (i) witnessed or experienced abuse or violence themselves; (ii) suffered from the loss of a close family member or friend; or (iii) experienced considerable disruption in their lives.
- c) students with SEN/D and those who identify as LGBT+ are particularly vulnerable to both abuse and child on child abuse.

How prevalent is child on child abuse?

Recent research suggests that child on child abuse is one of the most common forms of abuse affecting students in the UK. For example, more than four in ten teenage provider girls aged between 13 and 17 in England have experienced sexual coercion (Barter et al 2015). Two thirds of contact sexual abuse experienced by students aged 17 or under was perpetrated by someone who was also aged 17 or under (Radford et al 2011) and over a third of young boys in England admitted to watching porn and having negative attitudes towards women (University of Bristol and University of Central Lancashire, 2015).

What should I do if I suspect either that a student may be being abused, or that a student may be abusing others?

If a member of staff thinks for whatever reason that a student may be at risk of abuse from another student or young person, or that a student may be abusing others, the member of staff should report their concern to the DSL without delay in accordance with this policy. If a student is in immediate danger, or at risk of harm, a referral to Students's Social Care and/or the police should be made immediately.

How will the DSL respond to concerns of child-on-child abuse?

The DSL will discuss the behaviour with the member of staff and will, where necessary, take any immediate steps to ensure the safety of the victim(s) or any other student. Where the DSL considers or suspects that the behaviour might constitute abuse, Students' Social Care will be contacted immediately and, in any event, within 24 hours of the DSL becoming aware of it. The DSL will discuss the incident with Students' Social Care and agree on a course of action, which may include (a) taking any steps to ensure the safety and wellbeing of any students affected; (b) further investigation; (c) referral to other agencies such as the police (where a crime may have been committed), CAMHS, a specialist harmful sexual behaviour team and/or youth offending services.

Any response should be decided in conjunction with Students's Social Care and other relevant agencies and should:

- investigate the incident and the wider context and assess and mitigate the risk posed by the perpetrator(s) to the victim(s) and to other students;
- consider that the abuse may indicate wider safeguarding concerns for any of the students involved;
- treat all students (whether perpetrator or victim) as being at risk - while the perpetrator may pose a significant risk of harm to other students, s/he may also have considerable unmet needs and be at risk of harm themselves;

- take into account the complexity of child-on-child abuse and of students' experiences and consider the interplay between power, choice and consent.

While students may appear to be making choices, if those choices are limited, they are not consenting;

- take appropriate action in respect of the perpetrator – any action should address the abuse, the causes of it, attitudes underlying it and the support that may be needed if the perpetrator is at risk.

Factors to consider include: the risk the perpetrator(s) poses and will continue to pose to other students, their own unmet needs, the severity of the abuse and the causes of it.

Disciplinary action may be appropriate, including (a) to ensure that the perpetrator takes responsibility for and realises the seriousness of his or her behaviour; (b) to demonstrate to the perpetrator and others that abuse can never be tolerated; and (c) to ensure the safety and wellbeing of the victim and other students in the provider. Permanent exclusion will only be considered as a last resort and only where necessary to ensure the safety and wellbeing of the victim(s) and other students in the provider;

- provide on-going support to victim(s) including by (a) ensuring their immediate safety; (b) responding promptly and appropriately to the abuse; (c) assessing and addressing any unmet needs; (d) following the procedures set out in this Safeguarding Policy (including where the student is in need of early help or statutory intervention); (e) monitoring the student's wellbeing closely and ensuring that s/he receives on-going support from all relevant staff members within the provider; (f) engaging with the student's parents and any external agencies to ensure that the student's needs are met in the long- term; and

- consider the lessons that can be learnt from the abuse and put in place measures to reduce the risk of such abuse recurring.

This may include, for example: gender and equalities work, work around provider safety, security and supervision, awareness raising for staff, students and parents about a particular form of abuse, training for staff on handling certain types of incidents or abuse.

How does Cirque raise awareness of, and reduce the risk, of child on child abuse?

Staff are informed on the nature, prevalence and effect of child on child abuse, and how to prevent, identify and respond to it. Cirque actively seeks to prevent all forms of child on child abuse by educating students and staff, challenging the attitudes that underlie such abuse, encouraging a culture of tolerance and respect amongst all members of Cirque community, and responding to all cases of child on child abuse and any cases of bullying (no matter how trivial) promptly and appropriately.

Students are educated about the nature and prevalence of child on child abuse via RE and RSE; they are told what to do if they witness or are victims of such abuse, the effect that it can have on the victims and the possible reasons for it, including vulnerability of the perpetrator. They are regularly informed about our approach to such issues, including its policy towards all forms of bullying and child on child abuse.

Sexual Violence and Sexual Harassment between Students

Child on child abuse can include two specific forms, known as Sexual Violence and Sexual Harassment. Any response to these should fall within, and be consistent with, our wider approach to peer-on-peer abuse (see above). Sexual Violence includes sexual offences which fall under the Sexual Offences Act

2003. Sexual Harassment refers to ‘unwanted conduct of a sexual nature’.

This can occur online (including, but not limited to non-consensual sharing of images, making sexual comments on social media) and offline (including but not limited to making sexual comments, sexual taunting or ‘jokes’, and physical contact, for example, brushing against someone deliberately or interfering with their clothes).

Sexual Violence and Sexual Harassment can:

- occur between any two students, or a group of students against one individual or group;
- be perpetrated by a student of any age against a student of any age;
- be perpetrated by a student of any sexual orientation against a student of any sexual orientation;
- include behaviours that exist on an often progressive continuum and may overlap; and/or
- be online and offline (physical or verbal).

Advice from the Department for Education on Sexual Violence and Sexual Harassment Between Students in Providers and Colleges (2017) provides information about what sexual violence and sexual harassment is, how to minimise the risk of it occurring, and what to do when incidents occur, or are alleged to have occurred.

The DfE advice highlights best practice and cross-references other advice, statutory guidance and the legal framework. Cirque will apply the principles set out in it when considering their approach to sexual violence and sexual harassment between students.

Key Points

The above guidance:

- stresses the importance of making it clear that sexual violence and sexual harassment are not acceptable, will never be tolerated, and are not an inevitable part of growing up
- highlights the risks of tolerating or dismissing any forms of sexual violence or sexual harassment, and encourages early intervention to avoid potential escalation;
- advises on how to embed training and education on these issues within a strong pastoral system, and a planned taught programme across the whole curriculum;
- encourages forums that enable students to talk about issues openly;
- includes a list of possible topics that any taught programme could cover - including consent, gender roles, stereotyping and equality, healthy relationships, and power imbalances in relationships;
- advises on how to manage a disclosure, either from the student who has suffered abuse or from other students;
- provides guidance on when to carry out a risk and needs assessment for students affected by sexual violence or sexual harassment;
- provides guidance on initial considerations which providers should take into account when faced with a concern or allegation of sexual violence or sexual harassment - including the age and developmental stages of the students, and any power imbalance between them; and
- provides guidance on difficult scenarios which providers might encounter, for example, how to handle an incident between two students which is alleged to have taken place away from our premises.

Upskirting

The Voyeurism (Offences) Act, which is commonly known as the Upskirting Act, came into force on 12 April 2019. ‘Upskirting’ is where someone takes a picture under a person’s clothing (not necessarily a skirt) without their permission and or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation,

distress or alarm. It is a criminal offence. Anyone of any gender, can be a victim. Students with Special Educational Needs (SEN) are potentially more vulnerable, and there may be barriers in recognising abuse in this group of students. In addition, students who are perceived by their peers to be LGBT or identify themselves as LGBT may potentially be more vulnerable.

Bullying

While bullying between students is not a separate category of abuse and neglect, it is a very serious issue that can cause anxiety and distress. All incidences of bullying, including cyber-bullying and prejudice-based bullying should be reported and will be managed through our anti-bullying procedures.

Online safety

It is essential that students are safeguarded from potentially harmful and inappropriate material. The use of technology has become a significant component of many safeguarding issues, such as student sexual exploitation, radicalisation and sexual predation.

We have ensured that appropriate filters and monitoring systems are in place to manage the content available to students, who can contact our students and the personal conduct of our students online and have policies in place which pertain specifically to these procedures.

Staff training

It is important that all staff receive training to enable them to recognise the possible signs of abuse, neglect and exploitation and to know what to do if they have a concern.

New staff will receive training during their induction, which includes our student protection policy and staff behaviour policy, reporting and recording arrangements, and details for the DSL. All staff, volunteers will receive training that is regularly updated. All staff will also receive safeguarding and student protection updates via email, e-bulletins, website access and staff meetings throughout the year.

Safer recruitment

Cirque complies with the requirements of [DfE Keeping Students Safe in Education](#) (updated September 2022) and the local safeguarding partner arrangements by carrying out the required checks and verifying the applicant's identity, qualifications and work history. Cirque's Staff Recruitment policy and procedures sets out the process in full.

At least one member of each recruitment panel will have attended safer recruitment training.

Cirque obtains written confirmation from supply agencies or third-party organisations that agency staff or other individuals who may work in Cirque have been appropriately checked and are suitable to work with students.

Cirque maintains a single central record of recruitment checks undertaken.

Abuse of a position of trust

All provider staff are aware that inappropriate behaviour towards students is unacceptable and that their conduct towards students must be beyond reproach.

Staff understand that under Section 16 of the Sexual Offences Act 2003, it is a criminal offence for a person aged 18 or over to have a sexual relationship with students under 18 where that person is in a position of trust in respect of that student; even if the relationship is consensual or where the person does not teach the student. Such relationships/contact are a serious breach of trust and professional standards even where the student is over 18 and regardless of whether or not the student consents to that activity. It is also unacceptable for a member of staff to have any kind of sexual or intimate relationships/contact with a student of any age in attendance at any other provider. Members of staff are also prohibited from forming any kind of sexual or intimate relationships/contact with an individual under the age of 18, who is no longer in provider attendance. This forms part of our staff Code of Conduct.

Staff/student online relationships & communication

Cirque provides advice to staff regarding their personal online activity, including in the Code of Conduct, and has strict rules regarding online contact and electronic communication with students. Staff found to be in breach of these rules may be subject to disciplinary action or student protection investigation. Staff must only use their own work e mail addresses to communicate with students and students should only contact staff using their own provider e mail address. Staff and students should not be in contact on social media and students should not have or use staff personal telephone numbers. The staff Code of Conduct contains full guidance.

Allegations against staff

Staff who are concerned about the conduct of an adult (staff, volunteer, visitor etc.) towards a student are undoubtedly placed in a very difficult situation. They may worry that they have misunderstood the situation and they will wonder whether a report could jeopardise their colleague's career. All staff must remember that the welfare of the student is paramount.

All concerns of poor practice or possible student abuse by colleagues should be reported to the headteacher immediately. Complaints about the headteacher/principal should be reported to the chair of governors, chair of the management committee or proprietor.

Staff may also report their concerns directly to student's social care, the Local Authority Designated Officer (LADO) or the police if they believe direct reporting is necessary to secure action.

When an allegation is made against a member of staff, our set procedures must be followed. The full procedures for dealing with allegations against staff can be found in *Keeping Students Safe in Education (DfE, 2022)* and in our *Allegations of Abuse Against Staff/Adults policy and procedures*.

Allegations concerning staff who no longer work at the provider, or historical allegations will be reported to the police.

Role of Chairman and Safeguarding

The Chairman has a duty to ensure that Cirque meets its statutory responsibilities and ensure that the students and young people attending Cirque are safe.

The statutory guidance, '[Keeping Students Safe in Education](#)', places statutory requirements on all education providers.

The Chairman must make sure their provider has policies and procedures in place and take into account any statutory guidance issued by the Secretary of State, any local authority guidance and locally agreed inter-agency procedures.

Volunteers

Volunteers will undergo checks commensurate with their work in the provider, their contact with students and the supervision provided to them. Under no circumstances will a volunteer who has not been appropriately checked be left unsupervised. Volunteers are expected to abide by this policy and the code of conduct and to attend annual safeguarding training in order to visit the provider.

Contractors

We check the identity of all contractors working on site and requests DBS with barred list checks where required by statutory guidance. Contractors who have not undergone checks will not be allowed to work unsupervised during the teaching times.

Site security

Visitors to the provider, including contractors, 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 students do not need to sign in. All visitors are expected to observe our safeguarding and health and safety regulations. The headteacher will exercise professional judgement in determining whether any visitor should be escorted or supervised while on site.

Extended provider 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 provider activities are provided by and managed by the provider, our own safeguarding and student protection policy and procedures apply.

If other organisations provide services or activities on our site on behalf of our provider, we will check that they have appropriate procedures in place, including safer recruitment procedures.

When our students attend off-site activities, including day and residential visits and work related activities, our policies and safeguarding procedures still apply.

Signposting to further information

Annex A of KCSIE contains further guidance on a range of specific safeguarding issues, some of which are above. This section must be read by all staff that work directly with students. Any person that has a concern about a student within Cirque must follow the procedures outlined within this document. If staff have any concerns about a student's welfare, they should act on them immediately. Where a student is suffering, or is likely to suffer from harm, it is important that a referral to Students' Social Care (and if appropriate the police) is made immediately.

Annex A of KCSIE contains guidance on the following issues:

- Students and the court system
- Students missing from education
- Students with family members in prison
- Student sexual exploitation
- Student criminal exploitation: county lines
- Domestic abuse
- Homelessness
- So-called 'honour-based' violence

- Preventing radicalisation
- Child on child abuse
- Sexual violence and sexual harassment between students in providers and colleges
- Upskirting

Passing on safeguarding records when a student leaves the provider

Information sharing is vital in identifying and tackling all forms of abuse. When a student leaves the provider, it is the responsibility of the DSL to ensure that a copy of their safeguarding records is transferred securely and confidentially to the new provider. Before transferring, the DSL will arrange a telephone call with the DSL or Headteacher in the receiving provider. Following the conversation, they will arrange for the secure transfer of documentation.

Ensure that an indication of the existence of the additional student protection file is marked on the student provider file record.

Ensure that when a student transfers provider (including in-year), their student protection file is passed to the new provider as soon as possible, and within statutory timescales (separately from the main student file and ensuring secure transit) and that confirmation of receipt is received.

Ensure that where a student transfers provider and is on a student protection plan or is a student looked after, their information is passed to the new provider immediately and that the student's social worker is informed. In addition, consideration should be given to a multi-agency providers transition meeting if the case is complex or on-going.

If the transit method requires that a copy of the Student Protection file is retained until such a time that the new provider acknowledges receipt of the original file, the copy should be securely destroyed on confirmation of receipt.

Confidentiality, Sharing and Withholding Information

All matters relating to student protection will be treated as confidential and only shared as per the [‘Information Sharing Advice for Practitioners’ \(DfE 2018\) guidance](#).

Cirque will refer to the guidance in the in the data protection: toolkit for providers - <https://www.gov.uk/government/publications/data-protection-toolkit-for-providers> guidance to support providers with data protection activity, including compliance with the GDPR. Information will be shared with staff within Cirque who ‘need to know’.

Relevant staff have due regard to Data Protection principles which allow them to share (and withhold) information.

All staff must be aware that they have a professional responsibility to share information with other agencies in order to safeguard students and that the Data Protection Act 1998 and General Data Protection Regulations are not a barrier to sharing information where a failure to do so would place a student at risk of harm. There is a lawful basis for student protection concerns to be shared with agencies who have a statutory duty for student protection.

All staff must be aware that they cannot promise a student to keep secrets which might compromise the student's safety or wellbeing. However, staff are aware that matters relating to student protection and safeguarding are personal to students and families, in this respect they are confidential and the DSLs will only disclose information about a student to other members of staff on a need to know basis.

All staff will always undertake to gain parent/carers consent to refer a student to Social Care unless to do so could put the student at greater risk of harm or impede a criminal investigation.

(Continue on a separate page if necessary but indicate here and attach).

Received by:	DSL / DDSL / Headteacher / Chairman	Signature	
Name:		Date & Time:	

National Contacts

NSPCC 24/7 Helpline Tel: 0808 800 5000 Email: help@nspcc.org.uk NSPCC Text line 88858
NSPCC Student Line Tel: 0800 1111
NSPCC FGM helpline Tel: 0800 028 3550 Email: fgmhelp@nspcc.org.uk
NSPCC Whistleblowing helpline Tel: 0800 028 0285 (8am – 8pm) Email: help@nspcc.org.uk
DfE Prevent helpline for providers & parents Tel: 020 7340 7264 (non-emergency) Email:
counter.extremism@education.gsi.gov.uk
The Lucy Faithfull Foundation (LFF) Tel: 0800 1000 900 Email: help@stopitnow.org.uk
www.parentsprotect.co.uk
National Bullying Helpline Tel: 0845 22 55 787
UK Safer Internet Centre helpline for Provider Staff Tel: 0844 381 4772 Email:
helpline@saferinternet.org.uk
Internet Watch Foundation hotline for reporting criminal content www.iwf.org.uk Educate Against
Hate <http://educateagainsthate.com>

Studentnet International –making the internet a great and safe place for students. Includes
resources for professionals and parents <http://www.studentnet.com/>
Safer Internet Centre <http://www.saferinternet.org.uk/>
Contextual Safeguarding Network <https://www.contextualsafeguarding.org.uk/>

Related safeguarding Policies & Guidance

This policy should be read alongside our other safeguarding policies and staff Code of Conduct.

Reporting Forms:

- Low Level Concerns
- Allegations of Abuse against Staff/Adults
- Whistleblowing Policy

Guidance:

- Keeping Students Safe in Education 2022
- statutory guidance Working Together to Safeguard Students;
- departmental advice What to do if you are Worried a Student is Being Abused - Advice for Practitioners; and
- departmental advice Sexual Violence and Sexual Harassment Between Students in Providers and Colleges

A copy of our policies can be requested from Cirque office.

Covid-19

- <https://www.gov.uk/government/publications/covid-19-safeguarding-in-providers-colleges-and-other-providers/coronavirus-covid-19-safeguarding-in-providers-colleges-and-other-providers>

Cirque has a Risk Assessment in place and the Behaviour Policy reflects the CV19 updates around behaviours.