



SAFEGUARDING POLICY: HE and FE

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STATEMENT OF INTENT

Everyone employed by the Arts Educational Schools (ArtsEd) has a responsibility for safeguarding children and young people. Increasingly, schools and colleges are expected to work with, support and sometimes engage with different agencies to enable the most appropriate form of intervention to take place.

Although the students on our HE and FE courses are adults, government policy requires us to take the same steps and follow the same procedures for safeguarding students as those for younger children, including preventing them from being drawn into terrorism. This policy is adapted from the one developed for the ArtsEd Day School and Sixth form. The Day School policy should be referred to for more detailed guidance on child protection issues. This policy covers procedures for our HE and FE students, all of whom are 18 or over.

The policy aims to outline ArtsEd's statutory duties, the procedures that staff should follow and guidance on issues related to safeguarding generally. However, it is not exhaustive. All staff should use, as a rule of thumb, the needs and safety of the student as being at the centre of any decision they make. Our policy applies to all staff, trustees and students at ArtsEd.

ArtsEd is committed to safeguarding and promoting the welfare of students and expects all staff and students to share this commitment.

Foreword

This policy was revised in November 2018 in line with:

- The ArtsEd Day School/Sixth Form Safeguarding Policy
- Keeping children safe in education, September 2016
- Ofsted: Safeguarding children and young people and young vulnerable adults policy: February 2015
- Ofsted: Inspecting safeguarding in early years, education and skills settings: August 2015
- Prevent Duty Guidance: for higher education institutions in England and Wales: revised September 2015
- Prevent Duty Guidance: for further education institutions in England and Wales: revised September 2015
- Guidance on Prevent and the Channel Programme

Objectives

Everyone at ArtsEd shares an objective to help keep students safe by contributing to:

- Providing a safe environment for students to learn and achieve,
- Actively promoting the welfare of students,
- Identifying students who may be in need of extra support, are suffering or likely to suffer abuse or significant harm in college, on line, at home or in relationships,
- Taking appropriate action, working with other services as needed, with the aim of making sure that students are kept safe both at home and at college,
- Identifying students who may be at risk of being drawn into terrorism
- Taking appropriate action, working with other services as needed, to support students identified as being at risk of being drawn into extremism of any kind

The objectives referred to above are achieved through developing systems within the school aimed at;

- establishing a safe environment in which students can learn, develop and achieve
- raising awareness of individual responsibilities in identifying and reporting possible cases of abuse
- providing a systematic means of monitoring, recording and reporting of concerns and cases
- providing guidance on recognising and dealing with suspected abuse or significant harm
- promoting safe practice and challenging poor and unsafe practice
- providing a framework for inter-agency communication and effective liaison
- identifying strategies and interventions available to support students at risk
- ensuring we practice safe recruitment in checking the suitability of staff and visiting practitioners to work with students
- ensuring we comply with our duties under the Prevent strategy
- promoting the fundamental British values of democracy, the rule of law, individual liberty and mutual respect and tolerance for those with different lifestyles, race, ethnicity, social or economic background, faith or beliefs.

IMPORTANT CONTACT DETAILS

Hounslow First Contact Team (Adult Services)	020 8583 3100
Hetsie van Rooyen - Hounslow LADO	020 8583 3066
DfE dedicated phonenumber for non-emergency advice	020 7340 7264
Police force - non emergency	101
Local community police support officer Sgt Kevin Sinclair	020 8247 6415
Hounslow Prevent Coordinator Najeeb Ahmed	07890 540433 najeeb.ahmed@hounslow.gov.uk
Hounslow Prevent Education Officer Karmi Rekhi	020 8583 2573 07976 721119
Prevent co-ordinators – London area Sarah McClure and Chris Rowell	Sara McClure – 020 7783 8659 ext 228658 Sara.MCCLURE@education.gov.uk Chris Rowell - 020 7783 8659 ext 228658 chris.rowell@education.gov.uk
Prevent adviser OfS Richard Huzzey	0117 931 7119 r.huzzey@officeforstudents.org.uk

PROCEDURE

At ArtsEd we adopt the principles and pursue the objectives contained within the statutory guidance. The guidance on safeguarding stresses the importance of establishing channels of communication with relevant government agencies so that students requiring support receive prompt attention and any allegations of abuse or significant harm can be properly investigated.

All staff and Trustees to receive regular training in safeguarding every 3 years and are issued with relevant information/certification.

Any safeguarding cases or referrals to the Channel programme would be evaluated after the event and examined to establish whether or not due process had been followed and whether or not there was scope for any improvements to be made.

1. The roles of the Designated Safeguarding Lead and Designated Safeguarding Officer

The Board of Trustees are required to ensure that ArtsEd designates an appropriate senior member of staff to take lead responsibility for safeguarding. This person should have the status and authority within the institution to carry out the duties of the post including committing resources and, where appropriate, supporting and directing other staff. The Designated Safeguarding Lead (DSL) is the Deputy Headteacher of the Day School/Sixth form, Claire Parker-Wood.

The Principal, Chris Hocking, is the Designated Safeguarding Officer (DSO) for HE/FE. Any concerns should first be raised with the DSO, who will consult with the DSL about the appropriate next step. Either the DSL or DSO may refer to Hounslow Adult Protection Services for advice.

The Designated Safeguarding Lead is responsible for:

- co-ordinating action within the college and liaising with social care and other agencies over cases of abuse and suspected abuse
- holding current, relevant safeguarding documents and being fully conversant with these procedures
- acting as a source of expertise and advice within the school, briefing staff on the relevant contents of current government guidance, receiving reports of alleged or suspected abuse within the school, or reported by a student relating to incidents at home or outside ArtsEd and making safeguarding referrals, recording and reporting accordingly
- giving appropriate levels of safeguarding training to FE/HE Heads of Department, in order that they have the relevant knowledge and expertise to induct new staff (including part time staff)
- reviewing ArtsEd's safeguarding policies after each incident to ensure the policies are robust enough. These amendments would be reported to the trustee with overall responsibility for safeguarding
- conducting an annual review of ArtsEd's safeguarding policy in conjunction with the designated safeguarding trustee and DSO and feedback to the board of trustees in November
- liaising with all relevant LEA's

The DSL/DSO will:

- refer all cases of suspected abuse to the local authority social care department and:
 1. The local authority designated officer (LADO) for safeguarding concerns (all cases which concern a staff member);
 2. Disclosure and Barring Service (cases where a person is dismissed or left due to risk/harm to a student); and/or

3. Police (cases where a crime may have been committed).

- liaise with Social Services and other agencies about individual cases
- promote a culture of listening to students
- ensure that appropriate strategies for recording and reporting incidents are kept at ArtsEd
- provide appropriate feedback to members of staff as and when necessary
- if a student's situation does not seem to improve the DSL/DSO will press for reconsideration

Training

The DSL will:

- organise training on safeguarding for ArtsEd HE/FE Heads of Department every 3 years
- undertake level 3 refresher training every 2 years
- keep a training log of all safeguarding training attended by staff each year
- liaise with the HR Manager and/or Principal to arrange specialist safeguarding training e.g. Prevent duty/Suicide prevention

2. The role of all members of staff (APPENDIX 1)

Any member of staff who is told of an incident or who has a strong suspicion of abuse or significant harm to a student occurring on the premises, outside ArtsEd or at home must report it to the DSO immediately, who will consult the DSL. The safeguarding lead will usually decide whether to make a referral to social services, but it is important to note that any staff member can refer their concerns to social services, or the police, or directly inform the First Contact Team (Adult Services) at Hounslow: 020 8583 3100

If the allegations of abuse are about the Designated Safeguarding Lead or Designated Safeguarding Officer the report should be made to the Deputy Principal.

If, at any point, there is a risk of immediate serious harm to a student a referral should be made to social services immediately. Anybody can make a referral. If the student's situation does not appear to be improving the staff member with concerns should press for re-consideration. Concerns should always lead to help for the student at some point.

At all times staff should:

- be alert to the signs of abuse as detailed in this policy
- report any concerns immediately to the DSO or DSL
- consult with the DSO or DSL if in any doubt as to how to proceed
- maintain an attitude of 'it could happen here'
- follow the advice given in this policy in relation to how to handle disclosures
- contribute through the curriculum by developing students' understanding, awareness and resilience.

For students at risk, college may be the one stable place from which they can expect security and reassurance. It is not only about being alert to potential abuse or harm but providing the support to help students through difficult times, providing them with

the coping skills that can help avoid situations arising and deal with the emotional difficulties afterwards if they do.

Early identification of students who may not be at risk of significant harm but are in need of additional support from one or more agencies is also essential. The cases should lead to inter-agency assessments using the Local Authority processes. If a staff member feels that a student is in need of additional support as mentioned above they should record and report their concerns to the DSO or DSL.

Whistle-blowing

ArtsEd values its staff and has a robust system of reporting and handling of concerns, including poor or unsafe practice and potential failures in our safeguarding procedures. All staff are required to report to the Designated Safeguarding Lead, any concern or allegations about the behaviour of colleagues or practices which are likely to put students at risk of abuse or other serious harm. Any report made to the Designated Safeguarding Lead will be handled with complete sensitivity. The member of staff reporting the alleged incident should be assured that they would not face any retribution as a result of their actions.

3. The Role of the Board of Trustees

The Board of Trustees must ensure that they comply with their duties under legislation. They must also have regard to *KCSIE 2015* to ensure that the policies, procedures and training in the school are effective and comply with the law at all times.

The Board of Trustees will:

- ensure that ArtsEd designates an appropriate senior member of staff to take lead responsibility for safeguarding. This person should have the status and authority within the school to carry out the duties of the post including committing resources and, where appropriate, supporting and directing other staff
- ensure sufficient funding, time, supervision and support are given to the DSL in order to carry out their responsibilities effectively
- nominate a senior trustee to take responsibility for safeguarding arrangements at ArtsEd. The designated safeguarding trustee (DST) is Diana Maine
- it is also the role of the DST to liaise with the local authority and/or partner agencies on issues of safeguarding and in the event of allegations of abuse made against the Principal or a Trustee
- ensure there is an effective safeguarding policy in place together with a staff behaviour policy (see Appendix 5: Staff Code of Conduct). Both should be provided to all staff
- be responsible for undertaking annual reviews of the procedures that apply to safeguarding and judging the efficiency with which the related duties have been discharged
- consider how students may be taught about safeguarding through teaching and learning opportunities
- ensure there are procedures in place to handle allegations against members of staff and visiting practitioners.
- **make a referral to social services immediately if there is a risk of immediate serious harm to a student. Anybody can make a referral.**

Definition of abuse (APPENDIX 2)

Abuse is a form of maltreatment. Somebody may abuse or neglect a student by inflicting harm, or by failing to act to prevent harm. The abuser can be any age.

It is not the responsibility of school staff to decide whether abuse is occurring but we are required to act on any concerns and report them to the appropriate party. The health, safety and protection of the student are paramount.

Abuse might fall into the categories of:

- physical
- emotional
- sexual
- neglect
- discrimination (see also ArtsEd's Harassment Policy)

Knowing what to look for is vital to early identification of abuse. Appendix 2 outlines the signs and forms of abuse.

Abuse by one or more students against another: Should a staff member suspect that a student is suffering or is likely to suffer significant harm from another student/s the same procedures will apply.

Unwanted Sexual Attention: Recent high profile media stories including the 'Me Too' twitter campaign have highlighted the need to take active steps to prevent sexual harassment and abuses of power, change historic attitudes, and empower everyone in the industry, including students, to call such behaviour out and report it. In response we have reviewed current policies and ArtsEd's Harassment Policy sets out the code of behaviour expected of students and staff and the procedures to follow if any breaches of this code should occur. More detail is given in Appendix 3 below.

4. How should staff deal with allegations of abuse? (APPENDIX 1)

ArtsEd policy is that brief notes should be kept at the time of the incident - or immediately after. Records may be used in legal proceedings and must be kept accurate and secure. All records should be copied to the Designated Safeguarding Officer and DSL and should include factual information rather than assumption or interpretation. All information is stored in the HR Manager's office under lock and key. If English is the student's second language, the student's own language should be used to quote rather than a translation. *Staff should never reassure a student that what they are saying will be kept in confidence.* Records may be used at a later date to support a referral to an external agency.

5. Action by the Designated Safeguarding Lead when a concern is raised

The Designated Safeguarding Lead will;

- make a decision whether to continue to monitor the situation or take the referral further. This decision should be communicated to the individual making the initial referral.
- contact Hounslow's Social services if unsure at any stage
- follow-up the referral using the critical incident sheet as a basis for consideration before action
- make additional records of discussions and any investigation that takes place

- inform the Principal of the allegation unless he/she is the subject of the allegation
- take any necessary steps for the longer-term protection and support of each student who has made allegations of abuse, or is alleged to have suffered from abuse, taking his/her wishes fully in account
- ensure that any student being interviewed by police has available a supportive member of staff of his/her own choice if necessary
- inform the Hounslow Senior Advisor for Safeguarding; Sally Phillips (020 8583 3061) or Lyn Wilson
- if a student's situation does not seem to improve press for reconsideration.

6. Confidentiality

Educational staff have a professional responsibility to share relevant information about the protection of students with the investigative agencies. Members of staff should not promise confidentiality but can let the student know that only those who need to know will be informed, and always for the student's own sake. Time should be taken to reassure the student and confirm that information given will be treated sensitively. The member of staff should listen sympathetically and non-judgmentally.

Staff should be careful in subsequent discussions and ensure that information is only given to the appropriate person. All staff should be kept aware of issues relating to confidentiality and the status of information they may hold. Members of staff, other than the designated member and those involved closely, should only have enough details in order to help them to act sensitively and appropriately. Sensitive information regarding pastoral issues is kept securely in a lockable filing cabinet. Discretion should be used when talking about the personal and changing circumstances of students, for example if a student is seeing the Counsellor or is undergoing treatment for a mental health condition.

7. Allegations of abuse against a member of staff

Introduction

Allegations of abuse are difficult and distressing for all concerned. It is essential that policies and procedures are in place to manage these cases. Underpinning these procedures are the following principles: that there should be adequate protection for the student and also that the procedures should ensure that allegations against a member of staff are dealt with fairly, quickly and consistently.

Step 1: Initial considerations

Discussing the allegation. Allegations regarding staff should be made to the DSL and in their absence the Principal. If the allegations are about the Principal or DSL they should be reported to the Chair of Trustees. The Designated Safeguarding Lead should discuss the allegation with the Principal and/or the Designated Safeguarding Trustee (DST) to establish that the allegation is not blatantly false or malicious. KCSIE 2015 advises that a case manager is appointed; this would be either the Principal or the DST. The role of the case manager is to liaise with the DSL and lead on any decisions made.

The procedures for dealing with allegations need to be applied with common sense and judgement. Many cases may not warrant consideration of either a police investigation or enquiries by local authority social care services. In these cases, local school procedures should be followed to resolve cases without delay. Where the initial consideration decides that the allegation does not involve a possible criminal

offence it will be for the school to deal with it. Borderline case discussions with the LADO can be held informally and without naming the school or individual.

The initial sharing of information with the LADO and evaluation may lead to a decision that no further action is to be taken in regard to the individual facing the allegation or concern; in which case this decision and a justification for it should be recorded by both the case manager and the LADO, and agreement reached on what information should be put in writing to the individual concerned and by whom.

The following terms should be used when determining the outcome of allegations investigations; substantiated, malicious, false, unsubstantiated.

Step 2: Informing parents.

The needs and safety of the student are always at the centre of any decision. Therefore the DSO and DSL will consult with the student over whether to inform their parents about the allegation of abuse by a member of staff. Where a strategy discussion is required, or police or social care services need to be involved, the case worker should not contact the student's parents until those agencies have been consulted and have agreed what information can be disclosed to the parents or carers.

Step 3: Informing the member of staff. The person who is the subject of the allegation needs to be informed as soon as possible after consultation between the case worker and LADO. Where it is likely that police and / or children's social services will be involved, an agreement needs to be made with those agencies as to what information can be disclosed to the member of staff. If the staff member is a member of a trade union or professional association, he or she should be advised to seek support from them. It is advisable that they should also seek independent legal advice.

If the police decide to investigate, the school would not start their own investigation before the police have decided whether or not they intend to take the case through the criminal courts.

The school would seek to support the member of staff as much as possible as they are likely to feel threatened and isolated from others.

Ethos

For the sake of the student, their family (if informed) and the member of staff involved, it is important that an investigation is rigorous, timely, executed in a professional manner with due consideration for confidentiality and collaboration with other relevant agencies. The findings of the investigation and the rationale for any action taken must be recorded.

Suspending the member of staff

Suspension as a course of action would be considered where there is cause to suspect a student is at risk of significant harm, or the allegation warrants investigation by the police, or is so serious that it might be grounds for dismissal. Staff should not be automatically suspended, alternatives should also be considered. Suspension in a case of this kind is a procedural step only and must be viewed as a neutral action that does not presuppose guilt or innocence. Suspension itself does not constitute disciplinary action, and the member of staff will continue to receive full pay. Any disciplinary action would follow the procedures laid out in the Staff Handbook.

Investigations into an allegation of abuse should start with the presumption that the member of staff is innocent of any wrongdoing unless proven otherwise.

Confidentiality

As of October 2012 restrictions have been put into place on the reporting or publishing of allegations against teachers. The School will make every effort to maintain confidentiality and guard against unwanted publicity.

Criminal investigations

The police will aim to complete their enquiries as quickly as possible, consistent with a fair and thorough investigation. The police are expected to set a review of progress date at the outset of their investigation which should be no later than four weeks after the initial evaluation.

Disciplinary Action

Where it is clear that an investigation by the police or children's social care services is unnecessary or if the Crown Prosecution Service decides against criminal proceedings, disciplinary proceedings must always be considered. Where the initial consideration decides that the allegation does not involve a possible criminal offence it will be for the school to deal with it. In such cases, if the nature of the allegation does not require formal disciplinary action, the Headteacher/ caseworker should institute appropriate action within 3 working days. If a disciplinary hearing is required, the investigating officer should aim to provide the Head with a report within 10 working days.

Resignation and Compromise agreements

If a person tenders their resignation during an investigation, or before an investigation has started, the investigation should still be continued and recorded. Compromise agreements must not be used in such cases. Such an agreement may include restrictions on the employer in respect of sharing details of the case.

The school will refer individuals to the Disclosure and Barring Service where the school ceases to use that person's services (or they left) due to risk/harm to a child.
Failure to make a report to the DBS constitutes an offence.

Schools and colleges have a legal duty to refer to the DBS anyone who has harmed, or poses a risk of harm, to a child or vulnerable adult, or if there is reason to believe the member of staff has committed one of a number of listed offences, and who has been removed from working (paid or unpaid) in regulated activity, or would have been removed had they not left.

Action in respect of false or unfounded allegations

If the allegation is found to be false, and the person has been suspended, then the School will support him or her as best it can, if necessary with the provision of a mentor to return to work, and will attempt to minimise contact with the student(s) involved in making the allegation if they remain at ArtsEd. The school will consider serious disciplinary action against a student who has been found to make deliberately false allegations. The school may consider asking the police to ascertain whether or not they can take any action against the person responsible.

Records

A record should be kept of all allegations and the individual's confidential personnel file with a copy to the person concerned. The record should be kept until the member of staff's retirement age or for 10 years, depending on which is longer.

Allegations which are found to have been malicious should be removed from the staff member's personal records.

8. General advice to staff on physical contact with students

All tutors should be aware of issues related to touching and the way in which this might be misconstrued. This relates particularly to any sensitive areas of the body. Particular care needs to be taken when making corrections. At the beginning of each year staff discuss the issue of touching and physical contact and ask for any students to let them know if they do not wish to be touched.

In the event of physical restraint it is important that only the minimum amount is used in order to prevent the student from causing injury to themselves, others or property.

9. Safer recruitment procedures

The nature of ArtsEd with its large number of visiting industry creatives and practitioners poses significantly more challenges regarding safer recruitment. Please refer to the ArtsEd Safer Recruitment Policy for more detailed employment procedures.

It is our aim that all staff working within the HE/FE department should have undergone the following recruitment checks before they start to work unsupervised with students:

- There has been an identity check and a List 99/DBS check.
- Proof of identification has been received
- Two written references have been received and one of the references has been checked with a follow up phone call.
- The school has been provided with a full CV
- Checks have been carried out to establish the right to work in the UK
- The applicant is informed that their appointment is subject to a satisfactory DBS check and references.

It may not always be possible to undertake all the above checks for visiting tutors, industry creatives and practitioners, as a cornerstone of the vocational training at ArtsEd rests on the strong industry links forged with as wide a variety of industry professionals as possible. Some of these visitors may visit only once, others to teach short modules (e.g. 2 hours a week for five weeks). In these cases, DBS checks from another institution will be accepted. If no DBS check exists, a Google search will be undertaken, photo ID will be checked on arrival, and the visitor will be accompanied.

A single central register is kept of all staff's vetting information (including DBS and list 99 checks) by the HR Manager Cheryl Jarman. ArtsEd ensures that staff are appropriately trained regarding safer recruitment.

10. Prevent (APPENDIX 4)

Since the 1st July 2015 all schools, colleges and universities have been expected to have due regard to the need to prevent people from being drawn into terrorism. We are required to think about what we can do to protect students from the risk of radicalisation. This is known as the Prevent Duty. The Designated Prevent Lead is Deputy Principal Jane Morton, with Claire Parker-Wood taking lead on any issues relating to the Day School and Sixth Form. Any staff member who is concerned that a student may be at risk of being drawn into extremism of any kind which could lead to criminal activity are required to take these concerns to the Deputy Principal, who

will ask for advice and support from the London Prevent co-ordinators, who may refer the case to the Channel Programme for assessment.

The statutory Prevent guidance summarises the requirements on schools, HE institutions and FE colleges in terms of five general themes:

- **Risk Assessment**

An initial risk assessment was undertaken in October 2014 of all our provision, covering both the Day School/Sixth form and the HE/FE departments. This identified our risk of students being drawn into terrorism as very low risk/no risk. An action plan is in place to ensure that these two needs are met. Prevent has been added to the institution Risk Register, which is reviewed by the Board of Trustees in November each year.

- **Working in partnership**

The process for referrals of any concerns is set out in Appendix 3. If staff are concerned that a student may be at risk of being exploited or radicalised, they should inform the Principal, who will make a referral to the Channel Programme.

We have consulted our HEFCE Prevent co-ordinator Richard Huzzey and have made contact with the Prevent co-ordinators in London. Hounslow Borough Council are in the process of recruiting for a Prevent Co-ordinator, and we have yet to receive confirmation of the identity of our local Channel Police Practitioner. We will make contact with these people once the recruitment process is complete.

- **Staff training**

The risk assessment identified the need to provide Prevent training for all HE/FE staff. Senior staff have been given initial Prevent training and have completed the online training module on Channel General Awareness. Further training will be provided in December 2017. Heads of Department are responsible for ensuring that any staff they line manage are aware of the Prevent Duty and the process for raising any concerns.

- **IT policy**

It has always been a breach of ArtsEd IT policy to download or disclose information which is obscene, sexually, violently, racially or religiously graphic, inflammatory or discriminatory in nature.

Previously all online activity on ArtsEd computers has been screened, but did not allow for detailed reporting. The risk assessment identified the need for a more sophisticated internet filtering system. New software has been ordered (Bloxx) which can be set to restrict inappropriate content or extremist activity and generate detailed reporting to identify any user of the network, whether on wi-fi or networked computers, who is accessing sites which could put them at risk of radicalisation. Any student identified by the screening software will be referred to the Principal, and may be referred to the Channel Programme. The IT Policy is being updated to make specific reference to the Prevent duty.

- **Policy on External Speakers**

As noted above, the conservatoire training in the HE/FE departments is supported by the policy of employing high profile professional practitioners and industry creatives to work with students on projects, productions and short modules and to talk to students about their experience of working in the theatre, film and television industry. The only other visiting speakers who are invited in to ArtsEd are those who offer specialist knowledge in relation to student support, for example talks on Nutrition, Sexual Health, Staying Safe Online, Stress Management or Drugs Awareness.

As set out below under Chaplaincy Support, ArtsEd does not encourage students to create separate faith groups or societies. We have no plans to develop a policy on external speakers as the only speakers invited in to ArtsEd are those directly involved in the education and training of students for their chosen career.

- **Pastoral care**

ArtsEd takes its responsibilities for promoting student welfare very seriously, and has well established systems for providing student support. We operate an open door policy, and students are encouraged to discuss any problems or anxieties they may be experiencing with any trusted member of staff.

- **Chaplaincy support**

There is no demand for chaplaincy provision at ArtsEd and none provided. Students who request a prayer room will be accommodated using the normal room booking procedure, and on request students will be granted leave of absence for significant religious festivals which fall during term time.

Our full-time Acting and Musical Theatre courses are focused on training students for careers in the theatre, film and television industry. This industry has a history of promoting acceptance and celebration of diversity, whether this relates to ethnicity, race, sexual orientation, disability, or religious or political belief. In this context, ArtsEd does not encourage students to create separate faith groups or societies, as our policy is to promote open discussion and inclusion.

11. Reviewing policies and procedures

The DSL will keep informed of any statutory changes or information from the government and ensure that ArtsEd's safeguarding policy and procedures reflect any changes.

The DSL will conduct an annual review of the School's safeguarding policies in conjunction with the Designated Safeguarding Trustee and DSO and will feedback to the Board of Trustees.

In the case of an allegation made against a staff member, the DSL and Designated Trustee will review the Safeguarding policy after the allegation and feedback to the Trustees any amendments made to the policy.

The DSL will conduct a review of ArtsEd's safeguarding policies after each incident to ensure the policies are robust enough. These amendments would be reported to the Trustee with overall responsibility for safeguarding.

Review of HE/FE Safeguarding Policy

HE/FE Safeguarding Policy developed	October 2015
Most recently reviewed and updated:	January 2018
Next review date:	January 2019

Circulation to:

The Principal, Deputy Principal, Board of Trustees, Executive teams and teaching staff. Students will be able to access the policy on the website, a hard copy will be kept in the Library, and further copies will be provided on request.

APPENDIX 1 - Responding when students disclose acts of abuse

It is necessary to create the right atmosphere when meeting and communicating with students, to help them feel at ease. Students will need reassurance that they will not be victimised for sharing information or asking for help or protection. It is essential that any accounts of adverse experiences coming from students are as accurate and complete as possible. Accuracy is key, for without it effective decisions cannot be made and, equally, inaccurate accounts can lead to students remaining unsafe, or to the possibility of wrongful actions being taken.

If a staff member is the recipient of a student's confidence it is their responsibility to Observe, Record and Report. It is not the responsibility of staff to investigate possible abuse or neglect. They have a key role to play by referring concerns to the Designate Safeguarding Lead, providing information for police investigations and by contribution towards assessments. The DSL will in turn will refer concerns onto the Local Authority (Hounslow) First Contact Team in the Adult Social Care department.

FIRST CONTACT TEAM: 020 8583 3100

Staff should:

- Listen with care, allow silence
- Reassure the student that he/ she is not to blame and was right to tell you.
- Not show disbelief
- Not appear shocked or angry
- Not give a guarantee of confidentiality
- Take all allegations seriously
- Avoid being judgemental about the information given by the student
- Do not pursue matters by direct questioning; a student may become distressed when faced with resistant questioning. 'Open ended' questions should be used rather than 'leading' questions. The student should never be interrogated
- Ask the student what steps they would like taken to protect them now that they have made the allegation, and assure them that the school will try to follow their wishes.
- Alleged victims, perpetrators, those reporting abuse and others involved should not be interviewed by ArtsEd staff beyond the point at which it is clear there is an allegation of abuse. Interviewing of students at risk of abuse is now carried out by specially trained staff only, following procedures agreed by the Local Education Authority and the police
- Write a written report as soon as possible and make a copy available to the DSL
- Refer to the DSL in accordance with the School guidelines

REMEMBER

Keep detailed notes and make a record of them on the same day

Be vigilant for signs of abuse and never assume abuse is impossible within the school

The identity of the alleged perpetrator, be they staff, an adult or another student, will not be disclosed to anyone outside of the statutory reporting procedures.

APPENDIX 2 - Indicators of abuse

It is important to note that such lists as below are neither completely definitive nor exhaustive. A student may be subjected to a combination of different kinds of abuse. It is also possible that a student may show no outward signs and hide what is happening from everyone

Physical Abuse

A form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a student.

Signs of possible physical abuse

- Unexplained recurrent injuries or burns
- Injuries that form a shape or pattern that may look like the object used to make the injury (e.g. buckle, hand, iron, teeth, cigarette burns)
- Improbable excuses or refusal to explain injuries
- Wearing clothes to cover injuries, even in hot weather
- Refusal to change for physical classes
- Bald patches
- Running away
- Fear of medical help or examination
- Self-destructive tendencies
- Aggression towards others
- Fear of physical contact - shrinking back if touched
- Admitting that they are punished, but the punishment is excessive
- Fear of suspected abuser being contacted

Sexual Abuse

Involves forcing or enticing a young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the student is aware of what is happening.

Signs of sexual abuse

- Being overly affectionate or sexual
- Medical problems such as chronic itching, pain in the genitals, venereal diseases
- Other extreme reactions, such as depression, self-mutilation, suicide attempts, running away, overdoses, anorexia
- Personality changes such as becoming insecure or clinging
- Regressing to younger behaviour patterns
- Sudden loss of appetite or compulsive eating
- Being isolated or withdrawn
- Inability to concentrate
- Lack of trust or fear of someone they know well
- Over sexualised behaviour, promiscuity
- Pregnancy, particularly when reluctant to name father
- Become worried about clothing being removed
- Suddenly drawing sexually explicit pictures
- Drugs, alcohol or solvent abuse
- Trying to be 'ultra-good' or perfect; overreacting to criticism

Emotional Abuse

The persistent emotional maltreatment of a young person such as to cause severe and adverse effects on the student's emotional development. Refusing or failing to give adequate love of affection.

Signs of possible emotional abuse are:

- Physical, mental and emotional development lags
- Low self-esteem
- Sudden speech disorders
- Continual self-depreciation ('I'm stupid, ugly, worthless, etc')
- Overreaction to mistakes
- Extreme fear of any new situation
- Inappropriate response to pain ('I deserve this')
- Neurotic behaviour (rocking, hair twisting, self-mutilation)
- Running away
- Extremes of passivity or aggression

Female Genital Mutilation (FGM)

FGM is a criminal offense, and as an educational institution we have a mandatory duty to report any suspected cases to the police within one month of initial disclosure/identification.

A girl or woman who's had FGM may:

- have difficulty walking, sitting or standing
- spend longer than normal in the bathroom or toilet
- have unusual behaviour after an absence from college
- be particularly reluctant to undergo normal medical examinations
- ask for help, but may not be explicit about the problem due to embarrassment or fear.

Call the FGM helpline if you're worried a student is at risk of, or has had, FGM.

[0800 028 3550](tel:08000283550) [or email fgmhelp@nspcc.org.uk](mailto:fgmhelp@nspcc.org.uk)

If you're worried that a student has suffered FGM, look out for unusual behaviour.

The student could become:

- withdrawn
- suddenly behaves differently
- anxious
- clingy
- depressed
- aggressive
- problems sleeping
- eating disorders
- wets the bed
- soils clothes
- takes risks
- misses college
- changes in eating habits
- obsessive behaviour
- nightmares
- misuse of drugs and/or alcohol
- self-harm
- thoughts about suicide

Neglect

This is where parents/carers have failed to meet the basic essential needs of children, and this may have resulted in the serious impairment of the child's health or development by the time they reach adulthood and enrol on the HE/FE courses.

Signs of possible neglect are:

- Constant hunger
- Poor personal hygiene
- Constant tiredness
- Poor state of clothing
- Emaciation
- Untreated medical problems
- No social relationships
- Compulsive scavenging
- Destructive tendencies

A student going missing from an educational setting is a potential indicator of abuse or neglect. We will act to identify any risk of abuse and neglect, including sexual abuse or exploitation.

If you suspect a student might be a victim of neglect, [contact the NSPCC helpline](#) on [0808 800 5000](#).

Appendix 3: Sexual harassment, unwanted sexual attention, language or inappropriate behaviour of a sexual nature or intent

Sexual harassment is defined as any unwanted conduct of a sexual nature, or other conduct based on sex, affecting a person's dignity. This can include unwelcome physical, verbal or non-verbal conduct whereby the behaviour is inappropriate, offensive or distressing for the recipient; and such conduct creates an environment in which to work or study which is intimidating, hostile, humiliating or sexualised for the recipient. Conduct or comments become harassment when they are unwelcome to others or make others feel uncomfortable or threatened, even if they are intended as a joke. Intention is not the same as impact.

Unwanted sexual attention can take many forms, and the list below is not exhaustive. Conduct may include:

- i. Insinuating and sexualised remarks
- ii. Grabbing, deliberate touching
- iii. Suggestive gestures and jokes
- iv. Staring, meaningful glances
- v. Seemingly accidental touching
- vi. Demand for sexual attention
- vii. Derogatory remarks about an individual's body, manner or sexual activities
- viii. Insult after rejection of an advance and/or repeated propositions
- ix. Showing, sending or display or pornography
- x. Promise of advantage for sexual concessions
- xi. Threat of disadvantage for rejection of advances
- xii. Physical force, or threat of force, for sexual action

The procedure to follow when reporting allegations of this kind is set out in the **Harassment policy** which should be read alongside this document.

APPENDIX 4 – Prevent duty and the Channel programme

What is Channel?

Channel is an early intervention multi-agency process designed to safeguard vulnerable people from being drawn into violent extremist or terrorist behaviour.

Channel is designed to work with individuals of any age who are at risk of being exploited by extremist or terrorist ideologues. The process is shaped around the circumstances of each person and can provide support for any form of radicalisation or personal vulnerabilities.

Channel interventions are delivered through local partners and specialist agencies. The support may focus on a person's vulnerabilities around health, education, employment or housing, as well as specialist mentoring or faith guidance and broader diversionary activities such as sport. Each support package is tailored to the person and their particular circumstances.

How to recognise the signs of radicalisation

Staff are directed to the online Channel General Awareness training course on http://course.ncalt.com/Channel_General_Awareness.

The course takes about 20 minutes to complete. It gives general guidance on recognising the signs of radicalisation, and explains what Channel does to support people who may be vulnerable to exploitation, or may already be posing a risk to others.

What to do if you have a concern

ArtsEd's Designated Prevent Lead is the Deputy Principal, Jane Morton. If you believe that someone is vulnerable to being exploited or radicalised, inform Jane and she will seek advice and support from our local Prevent co-ordinator. However **anyone can ask for advice or make a referral**.

Referrals should be made to the safeguarding team of the student's borough of residence, and copied to our local authority Prevent co-ordinator Joan Conlon at Hounslow Borough Council, who will refer on to the Channel programme if required.

If you have any immediate concerns:

Phone the Police non-emergency line: 101

Otherwise, the Prevent contacts below are there to offer support and advice:

Hounslow Prevent Education Officer Karmi Rekhi	020 8583 2573 07976 721119
Hounslow Prevent Coordinator Najeeb Ahmed	07890 540433 najeeb.ahmed@hounslow.gov.uk
Hounslow Prevent co-ordinator	Joan.Conlon@hounslow.gov.uk
Local Channel Police Practitioner PC Tim Pope	Tim.Pope@met.pnn.police.uk
Prevent co-ordinators – London area Sarah McClure and Chris Rowell	Sara McClure – 020 7783 8659 ext 228658 Sara.MCCLURE@education.gov.uk Chris Rowell - 020 7783 8659 ext 228658 chris.rowell@education.gov.uk
Prevent adviser OfS Richard Huzzey	0117 931 7119 r.huzzey@officeforstudents.org.uk

APPENDIX 5

STAFF CODE OF CONDUCT

The purpose of this Code of Conduct is designed to give clear guidance on the standards of behaviour all ArtsEd staff are expected to observe.

At ArtsEd staff are expected to:

- Demonstrate consistently high standards of professional conduct in order for students to do the same.
- Maintain high standards of ethics and behaviour both in and outside ArtsEd.
- Maintain appropriate boundaries between professional and personal life.
- Treat students, colleagues and visitors equitably, professionally and respectfully.
- Place the needs and safety of the student at the centre of any decision they make.
- Be aware of how behaviour may be perceived: intention is not the same as impact.
- Avoid any professional or personal behaviour which could risk damaging ArtsEd's reputation within the industry or the local community.

If a member of staff does not follow this code of conduct this may lead to disciplinary procedures.

Other relevant policies/documents:

- Safeguarding Policy – HE/FE
- Equal Opportunities Policy
- Policy on Harassment, Bullying and Unwanted Sexual Attention
- Student Charter
- Staff Handbook

Day School/Sixth Form:

Staff working in the Day School/Sixth Form are subject to a more detailed Staff Code of Conduct, available from the Deputy Headteacher and Designated Safeguarding Lead, Claire Parker-Wood.