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Contents

Quick Read Guide to Safeguarding at Treloar's 4

Aim of Policy 6

Statement of Policy 6

Scope of policy 7

Key Principles 8

- Legal responsibilities 8
- Student focus 9
- Equality and diversity 9
- Self-determination and consent 9
- Sharing information and confidentiality 10
- Staff training and support 11
- Definitions 11

Roles and responsibilities 12

- Designated Safeguarding Lead 12
- Governors & Trustees 12
- The Principal/CEO 12
- The Head of Safeguarding 13
- Managers 14
- Staff 14

Key Procedures: 15

- Prevention 15
- Early Help 15
- Children in Need 16
- Child Protection Plans 17
- Looked after children 17
- Adults with care and support needs 18
- Peer on peer (or "child on child") abuse 21
- Transition 23
- Radicalisation & PREVENT 23
- Female Genital Mutilation (FGM) 23
- Safeguarding Records 24
- External Notification & Investigation 24
- Employment 25

Links with Other Policies and Procedures 27
Communication Requirements 28
Monitoring and Review 28
Revision History 28
Further sources of information:- 30
Appendix 1 - Staff safeguarding guidelines for when harm is suspected, disclosed or witnessed 31
Appendix 2: Managers safeguarding guidelines for when harm is suspected, disclosed or witnessed 35
Appendix 3 - Types of abuse 36
Appendix 4 – Sexual Behaviour in children and young people 37
Appendix 5 –Challenge - staff guide 44
Appendix 6: Out of Hours Safeguarding Managers' Guide 46
Appendix 7 - Safeguarding on-call Guidelines for Safeguarding Manager 48
Appendix 8 - Allegations against staff procedure 51
Appendix 9 - Safeguarding investigation procedure 53
Appendix 10 - Safeguarding case review procedure 55
Appendix 11 - Whistleblowing in a Safeguarding Context 57

Quick Read Guide to Safeguarding at Treloar's

Are you worried about a student? Do you think that they are being abused, or that they could be hurt or harmed?

Make sure they are safe and call the safeguarding manager on

07825 262 418

for advice and support– 24 hours a day, 365 days a year

IF IN DOUBT, SPEAK OUT

Are you worried about the behaviour of a member of staff (or visitor, volunteer)?

Could this behaviour harm a student?

Make sure students are safe and call the safeguarding manager on

07825 262 418

for advice and support– 24 hours a day,

365 days a year

Aim of Policy

The aim of this policy is to set out how Treloar's School and College will ensure that all students are safeguarded from harm in line with statute, regulation, guidance, national minimum standards and good practice.

This policy also incorporates the Child Protection and Peer-on-Peer Abuse policies.

Statement of Policy

This policy provides the framework whereby Treloar's will safeguard and protect children and young adults from harm regardless of the source of harm – be that from within the individual's' home environment, harm caused by peers, harm from staff or volunteers or self-harm.

We hope to provide all students with a safe and caring atmosphere, but will always maintain an attitude of "**it could happen here**" where safeguarding is concerned.

Whilst the focus of this policy will be on Treloar students, we have a duty and responsibility to safeguard all children and adults with whom we may come into contact, be they students, tenants, visitors, siblings, staff members, apprentices, volunteers or members of the public.

This policy incorporates Treloar's **child protection policy** and **adult safeguarding policy**.

Although principles are similar, the safeguarding and protection of adults and children are governed by different legislation. A child is subject to legislation on account of their age, an adult by virtue of their care and support needs.

Treloar's recognises the right of all people to live, study and work in a safe environment and in an environment where they feel safe. We are committed to safeguarding and promoting the welfare of children, young people and adults with care and support needs and will do this by adopting the following principles.

Everyone at Treloar's has a responsibility to prevent, recognise and act on harm, abuse and neglect.

Everyone has the right to live free from abuse and neglect.

Everyone has the right to be treated with respect and dignity, with a right to privacy.

To ensure this Treloar's will:

- help students keep themselves safe
- keep the interests of students at the centre of any safeguarding activity
- involve students and the parents and family as appropriate in decision-making and investigations of abuse
- ensure our students are aware of safeguarding policies and procedures.
- ensure all staff and volunteers understand their role in relation to safeguarding. We will provide appropriate training and ensure staff are competent in preventing, recognising and acting on abuse, exploitation and neglect, and create the conditions whereby all are kept safe.
- promote an organisational culture of openness, so that staff, volunteers and students can raise their concerns, and know that they will be listened to, without worrying that something bad will happen as a result.
- ensure that all actions will take into account and respond to individuals' race, culture, religion, gender, sexual orientation, disability and communication needs.
- ensure that individuals against whom an allegation has been made have the right to fair and unbiased treatment, and to be kept fully informed, whilst prioritising the safety of children and adults who use our service.
- take positive action where abuse, exploitation or neglect is identified or suspected.
- ensure that processes are in place to check suitability of staff (including contractors and external students, volunteers and students working closely with students). All will have undergone recruitment processes, including DBS disclosures in line with Government guidance.
- operate an effective whistle blowing policy.
- not tolerate any form of abuse, bullying or discrimination.
- create an environment where the likelihood of harm is reduced.

This policy is consistent with Hampshire Safeguarding Children Partnership (HSCP) child protection procedures and Hampshire Safeguarding Adults Board (HSAB) safeguarding procedures.

The college, school secondary and primary stages, and early years all have different needs. While this policy applies to all age groups, they will have different needs, and staff should respond accordingly. Different stages are subject to different regulations and managers will take heed of these in planning services.

Scope of policy

The policy applies to all staff, (including agency staff), employed by the school and college, temporary staff, trustees and governors, volunteers, apprentices, contractors and students.

The policy applies to children and adults unless stated otherwise.

Key Principles

Legal responsibilities

Treloar's operates with a legal framework and will ensure that all staff work within this.

Treloar's will ensure its policies and procedures comply with statute including:

- Children Acts 1989 and 2004,
- Mental Capacity Act, 2005
- Safeguarding Vulnerable Groups Act 2006.
- Care Act 2014
- General Data Protection Regulation (GDPR)
- Data Protection Act 2018
- Data (Use and Access) Act 2025

It will also comply with associated regulation and statutory guidance including:

- Working Together to Safeguard Children
- National Minimum Standards, CGC and Ofsted registration standards and Local Safeguarding Children Board and local authority procedures.
- Keeping Children Safe in Education
- Mental Capacity Act Code of Practice
- Deprivation of Liberty Safeguards Code of Practice.
- Care Act Guidance 2014
- Prevent Duty Guidance
- Child Care Act 2006 including guidance on those disqualified under this legislation.
- Statutory framework for the early year's foundation stage

Unlawful behaviour will not be tolerated and where appropriate regulatory and investigatory authorities will be informed.

Student focus

The student who is at risk of or suffering abuse, exploitation or neglect is the focus of intervention. They must be treated with dignity and respect and involved as much as is practicable in the process outlined in this document. Where communication or other difficulties impede participation, steps should be taken to overcome them.

Students can be perpetrators as well as victims and their needs must be considered as long as is consistent with this policy. Further detail regarding how to respond to concerns about “peer on peer” abuse is contained within Policy SMT048 Peer-on-peer Abuse.

Students at Treloar’s are supported to be able to raise worries and to talk to any member of staff. All staff receive training in how to respond to and support students with concerns and disclosures of abuse in order to help reduce any barriers that may otherwise prevent students in speaking out about their worries.

Students reporting concerns should always be taken seriously, kept safe and should never be made to feel like they are creating a problem by reporting abuse, sexual violence or harassment.

If a student wishes to speak to the Head of Safeguarding about any matter this should be encouraged. Staff should call the safeguarding number (07825 262 418) as soon as possible so that this can be arranged, or alternative support be considered.

Equality and diversity

Any activities must take into account and respond to students' race, culture, religion, gender, sexual orientation, disability and communication needs.

Self-determination and consent

Students should have the greatest possible control over their lives. Available information and options should be clearly outlined to assist students in expressing their wishes.

For students over the age of 16 the Mental Capacity Act 2005 applies and there is a presumption that they have capacity to make decisions, unless proven otherwise. This does not however override our duty to ensure that students are safe and protected from harm.

Sharing information and confidentiality

There is a presumption that information will be shared with those who need to know. Most personal information will only be shared with the informed consent of the student, however, there will be occasions when lack of consent will be overridden, for example when it is used to prevent harm, a crime has been committed or when it is assessed that the student does not have capacity to make the decision.

No member of staff should ever promise absolute confidentiality, and should always consider that information may need to be shared to protect the student, or others.

An assessment of whether a child is capable or competent to giving the necessary consent will depend on the child's maturity and understanding and the nature of the consent required. The child must be capable of making a reasonable assessment of the advantages and disadvantages of the course of action proposed, so the consent, if given, can be properly and fairly described as true consent.

An assessment of whether a student aged 16 or over is able or not to give consent will be governed by the Mental Capacity Act.

The Data Protection Act 2018 and the GDPR place duties on organisations and individuals to process personal information fairly and lawfully and to keep the information they hold safe and secure. **The Data Protection Act 2018 and GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare and protect the safety of children. (Working Together to Safeguard Children)**

It should also be noted that GDPR also allows for the withholding of information where necessary to prevent harm, for example not disclosing the address of a parent or child who are sheltering in a refuge. Any such queries should be directed to the Head of Safeguarding who will support staff to determine the best course of action in correspondence with our data controller.

Further information and support regarding information sharing is available within the Hampshire Safeguarding Children Partnership Information Sharing Toolkit.

Staff training and support

All staff, volunteers and governors and trustees will receive safeguarding training, support and supervision appropriate to their role. At Treloar's we expect that all staff attend in-depth Safeguarding training every three years, or sooner if required.

This training supports all staff at Treloar's, regardless of role, to understand why safeguarding is important, what to look out for, and how to support a student who may be at risk of, or discloses harm. This is essential given that students may speak to any member of staff.

At Treloar all staff are expected to have completed Safeguarding training either prior to starting their role, or shortly after starting as part of their induction. This should be completed within 6 weeks of their start date[1] in line with NICE guidance.

All staff will receive safeguarding updates relating to changes in legislation, regulation, guidance and good practice as appropriate. This will be through inset-day training sessions, emails, information on SharePoint, staff briefings and focused training for specific groups of staff. Whilst the expectation is that all receive at least a yearly update in practice this will be more frequent.

All staff, including support staff, volunteers, governors and trustees, will read and understand Part One of Keeping Children Safe in Education 2026.

Additional training, advice and support for all staff is available from the Hampshire Safeguarding Children Partnership.

Definitions

Abuse is a violation of an individual's human and civil rights by any other person or persons.

A child is anyone up their 18th birthday. Young people below the age of 18 will be referred to as children in this policy.

An adult with care and support needs is someone 18 years or over and defined in the Care and Support (Eligibility Criteria) Regulations 2014. All adults at Treloar's, by virtue of their being admitted, have care and support needs.

[1] Recommendations | Safeguarding adults in care homes | Guidance | NICE

Peer-on-peer relates to the risk of abuse or harm occurring between students. This may also be called **child-on-child** abuse; however we have consciously referred to "peer-on-peer" throughout this policy acknowledging that the impact can be as significant for adult (over 18) as for child (under 18) students.

A parent is anyone with parental responsibility for a child.

Safeguarding goes beyond protection and involves creating the conditions whereby harm is prevented and students' welfare is promoted

Types of abuse
See Appendix 3

Roles and responsibilities

Designated Safeguarding Lead

The Head of Safeguarding is the Designated Safeguarding Lead for Treloar's, including the school, college and wider charity activities. This is reflected in the job description for this role.

The Chief Executive is the Deputy Designated Safeguarding Lead.

Additional staff (e.g. Head of Residential Services, Director of Education) may also be nominated as DDSL's.

Governors & Trustees

Governors and Trustees have a responsibility to hold the Principal/CEO to account for the effectiveness of Treloar's policies and procedures. This includes ensuring that there are appropriate policies in place that are understood and used effectively and that their effectiveness is regularly monitored.

The Principal/CEO

The Principal/CEO of the school and college has a responsibility to ensure that the policies, procedures and systems are effective in safeguarding children and adults with care and support needs. They also have a responsibility to ensure that members of the Senior Management Team prioritise safeguarding.

The Principal/CEO is also a trained Designated Safeguarding Lead and receives training in line with this responsibility.

The Head of Safeguarding

The Head of Safeguarding is responsible for:

- having lead responsibility for safeguarding and child/adult protection in Treloar's
- ensuring that effective policies, procedures and systems are in place for safeguarding students;
- briefing the Principal/CEO, senior managers, governors and trustees of relevant safeguarding issues
- the effective implementation and operation of safeguarding policies, procedures and systems;
- ensuring that staff are provided with high quality safeguarding training;
- enabling students to discuss safeguarding matters with a trusted adult;
- ensuring that Treloar's works with outside agencies where necessary. This will include cooperating with the police and local authorities in the investigation abuse and the prevention of harm, CQC and Ofsted.
- ensuring that concerns, discussions and decisions made relating to safeguarding issues are recorded appropriately, and are shared where necessary.
- Referring cases where a person is dismissed or left due to risk/harm to a student to the Disclosure and Barring Service as required
- acting as a "point of contact" with the three safeguarding partners
- liaising with the Local Authority Designated Officer, CQC and other bodies as required
- acting as a source of support, advice and expertise regarding safeguarding matters for all staff

The Head of Safeguarding is the Designated Safeguarding Lead (DSL) for Children and Adults.

The Head of Safeguarding also represents Independent Schools within the Hampshire Safeguarding Children Partnership.

The Head of Safeguarding will ensure that s/he (or an appropriately trained deputy) is available when students are present on campus. Treloar's will ensure clear arrangements for DSL and deputy cover at all times when students are present and whenever safeguarding concerns may require a response.

The Head of Safeguarding will help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children(including children with a social worker) are experiencing, or have experienced, with teachers and school and college leadership staff. They will help ensure that staff know who these children are, understand their academic progress and attainment and maintain a culture of high aspirations for this cohort; support teaching staff to identify the challenges that children in this group might face and the additional academic support and adjustments that they could make to best support these children.

Further information about the DSL for children can be found at:
https://www.gov.uk/government/publications/keeping-children-safe-in-education

Managers

All managers have the responsibility for:

- ensuring safeguarding is considered when undertaking all activities;
- promoting a positive culture of challenge and transparency;
- promoting awareness of this policy and related procedures though supervision and distribution of guidance;
- ensuring their staff receive agreed safeguarding training;
- ensuring that appropriate action is taken in line with this policy wherever safeguarding concerns arise;
- promoting the safety of students;
- calling on emergency services appropriately where there is immediate danger;
- making students aware of the policy and procedures;
- cooperating with any enquiry into safeguarding matters conducted by the Head of Safeguarding and statutory agencies;
- working with other professionals to prevent abuse.

Staff

All staff have the following responsibilities to:

- treat all students with dignity and respect;
- ensure students' welfare is the paramount consideration in all they do;
- follow care plans, training and guidance provided to them by qualified professionals, and to only operate in line with their level of professional expertise;
- take action against abuse wherever it is suspected with reference to policy and guidance;

- cooperate with the police, local authorities, CQC and Ofsted in the investigation of abuse and prevention of harm;
- reassure students that they will be listened to;
- work with other professionals to prevent abuse;
- be aware of the signs of abuse;
- ensure their training is updated according to Treloar's policy;
- report safeguarding concerns to their manager or DSL without delay;
- share information (within the law) whenever necessary to safeguarding students and promote their welfare.

Key Procedures:

Prevention

Treloar's recognises that safeguarding children and adults with care and support needs requires more than a response when abuse or risk of abuse is identified. It will therefore strive to create the conditions where abuse and neglect is prevented from occurring in the first place. It will do this by:

- operating a policy of zero tolerance of abuse and bullying;
- empowering students to take responsibility for their own behaviour;
- ensuring access to managers with expertise in safeguarding;
- ensuring that students have trusted adults to speak with when the behaviour of others concerns them;
- ensuring students have knowledge of abuse and what to do when they see it;
- ensuring students have knowledge of relationships and sexuality;
- operating a Sexuality and Further Education (SAFE) policy which covers personal relationships;
- ensuring that all staff are familiar with this policy and receive appropriate regular training;
- ensuring that appropriate safeguards are in place to monitor and filter online use by students and staff, and that students and staff are supported to understand both the benefits and risks of technology use, and how to address any concerns

Early Help

In 2023 Working Together to Safeguarding Children expanded the definition of "safeguarding" to include *"providing help and support to meet the needs of children as soon as problems emerge"*.

All school and college staff should be prepared to identify children who may benefit from early help. Early help means providing support as soon as a problem emerges at any point in a child's life, from the foundation years through to the teenage years. In the first instance, staff should discuss early help requirements with the designated safeguarding lead. Staff may be required to support other agencies and professionals in an early help assessment.

While most children at Treloar's will receive significant community services, it is important to recognise that needs change over time and emerging needs may require external referral.

Any child may benefit from early help, but all school and college staff should be particularly alert to the potential need for early help for a child (whether a Treloar's student or simply someone whom we are aware of) who:

- is disabled and has specific additional needs
- has special educational needs (whether or not they have a statutory Education, Health and Care Plan)
- is a young carer
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups
- is frequently missing/goes missing from care or from home
- is at risk of modern slavery, trafficking or exploitation
- is at risk of being radicalised or exploited
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- is misusing drugs or alcohol themselves
- has returned home to their family from care
- is a privately fostered child
- Has a mental health need
- Is persistently absent from education

Children in Need

Treloar's will work closely with students, families, local authorities and partner agencies where Treloar's students are identified as being "Children in Need".

Section 17 of the Children Act 1989 defines a "Child in Need" is being a child where:

(a)he is unlikely to achieve or maintain, or to have the opportunity of achieving or maintaining, a reasonable standard of health or development without the provision for him of services by a local authority under this Part;
(b)his health or development is likely to be significantly impaired, or further impaired, without the provision for him of such services; or (c)he is disabled,

As such we consider the majority of our students to be entitled to assessment and will support families and professionals to request this where unmet needs present.

We will seek to identify appropriate professionals to attend meetings that are arranged, and to contribute to the multi-agency plan. Ordinarily the Student's Progress Coordinator would attend and coordinate input from any other relevant Treloar's professionals.

Details of children who have Child in Need status are saved within the "Student Support" section of SharePoint.

Child Protection Plans

Where students are considered at risk of significant harm and a Child Protection Plan is in place the Head of Safeguarding will coordinate support at Treloar's to ensure that there is effective contribution from Treloar's to the multi-agency safety plan, and so that the student is given support as necessary.

Good practice dictates that key staff (e.g. members of MDT, key care staff) would be informed of the plan and actions arising from it so that all can work together to help the student thrive and ensure their safety.

Looked after children

Treloar's is proud of the support that it looks to offer children who are "looked after". The majority of students who are looked after at Treloar's have this status under Section 20 of the Children Act and Short Breaks legislation, while Treloar's also provides support to those who are accommodated due to a Care Order and those who have previously been looked after.

The Head of Safeguarding should be informed of any student who is either being placed at Treloar's as a child who is Looked After, or where there is a proposed change of status. The Head of Safeguarding will ordinarily attend the initial placement planning meeting, and the initial CLA review, whilst members of the wider Treloar's MDT will attend and contribute as needed.

Adults with care and support needs

All Treloar students will likely have care and support needs as per the Care Act 2014. Parents, carers, siblings, partners of students and staff may also have care and support needs themselves.

Where a student or their family require support in accessing assessments from a local authority or clinical commissioning group, we will seek to support this where possible to ensure that needs are well met with appropriate support in place.

Where there is information to suggest that an adult with care and support needs is at risk of abuse or neglect this should be treated as a safeguarding concern.

Online safety and harm

Treloar's recognises that technology is an integral part of students' lives and can provide significant educational, social and communication benefits. However, online activity can also expose children to safeguarding risks, including abuse, exploitation, harmful content and inappropriate contact. Online safety is therefore a safeguarding issue and a whole-setting responsibility.

All staff should understand that safeguarding incidents can take place both online and offline and that children may be harmed through the use of technology, mobile devices, gaming platforms, social media, messaging applications and emerging digital technologies. Staff should maintain an attitude of "it could happen here" and remain vigilant to indicators of online harm.

Online risks may include, but are not limited to:

- Child sexual exploitation and abuse.
- Online grooming.
- Bullying and cyberbullying.
- Harassment, including sexual harassment.
- Sharing of nude or semi-nude images.
- Coercion, exploitation and extortion.
- Exposure to harmful, violent or extremist content.
- Misinformation, disinformation and conspiracy theories.
- Criminal exploitation.
- Technology-facilitated child-on-child abuse.
- Abuse involving artificial intelligence (AI), including manipulated, generated or altered images and videos.

Treloar's recognises the increasing risks presented by generative artificial intelligence and digitally manipulated content. Harm may occur through the creation, possession or sharing of AI-generated nude or semi-nude images, "deepfakes", "deep nudes", impersonation, image manipulation, harassment or other forms of abuse. Any concerns relating to AI-generated content will be treated as safeguarding concerns and managed in accordance with safeguarding procedures. Please see ICT012 Artificial Intelligence policy for more information.

The term "making or sharing nudes and semi-nudes" includes photographs, videos, livestreams and other visual images created, shared or stored by children under the age of 18. This includes images that have been digitally altered or wholly generated using artificial intelligence. Staff must not view, copy, print, store or share such images unless explicitly directed as part of an agreed safeguarding response and should seek immediate advice from the Designated Safeguarding Lead (DSL).

Treloar's will maintain appropriate filtering and monitoring systems to help protect students while recognising that no technical system can eliminate all risk. Filtering and monitoring arrangements will be reviewed regularly to ensure they remain effective, proportionate and responsive to emerging risks.

Staff will receive training and updates regarding online safety risks, including emerging technologies, online abuse, harmful sexual behaviour facilitated by technology, AI-related risks and local and national safeguarding trends. Students will be supported through the curriculum and wider pastoral provision to understand how to keep themselves safe online, how to report concerns and how to access support when needed.

Any member of staff who becomes aware of an online safety concern must take it seriously and report it promptly to the Designated Safeguarding Lead or deputy DSL in line with this policy. Concerns involving exploitation, abuse, sharing of sexual images, grooming, harmful content or significant risk of harm will be managed as safeguarding matters and referred to external agencies where appropriate. Please see ICT004 E-Safety Policy for more information.

The Governing Body and senior leaders will receive regular assurance regarding the effectiveness of filtering and monitoring arrangements. These arrangements will be formally reviewed by the e-safety committee at least annually, with records maintained of decisions and actions taken.

Students Requiring Mental Health Support

Treloar's recognises that mental health problems can, in some cases, be an indicator that a student has suffered or is at risk of suffering abuse, neglect, exploitation or other adverse experiences. While only appropriately trained professionals should attempt to make a diagnosis of a mental

health condition, all staff should be aware of signs that may indicate a student is experiencing emotional or mental health difficulties and should be prepared to respond appropriately.

All staff should remain alert to students who may be experiencing:

- Persistent sadness, anxiety or low mood.
- Significant changes in behaviour, mood or presentation.
- Withdrawal from friends, activities or usual routines.
- Changes in sleep, eating or personal care.
- Increased emotional distress or dysregulation.
- Expressions of hopelessness or worthlessness.
- Self-harm or thoughts of self-harm.
- Suicidal thoughts, statements or behaviours.
- Risk-taking or self-destructive behaviours.
- Deterioration in attendance, engagement or educational outcomes.

Where staff have a concern about a student's mental health or emotional wellbeing, they should discuss this promptly with the Designated Safeguarding Lead (DSL), Deputy DSL or an appropriate senior manager. Mental health concerns should be considered alongside any other safeguarding concerns and staff should consider whether the student's presentation may indicate that they are experiencing abuse, neglect, exploitation, bullying, peer-on-peer abuse or other forms of harm.

Treloar's will work collaboratively with students, families, health professionals, social care and other agencies as appropriate to ensure that students receive timely and effective support. Where concerns do not meet statutory safeguarding thresholds, consideration should be given to Early Help, pastoral support, healthcare involvement or other appropriate interventions.

Any student who is believed to be at immediate risk of serious harm, suicide or significant self-injury will be treated as an emergency. Staff must take immediate action to secure the student's safety and seek urgent assistance from emergency services and appropriate healthcare professionals where necessary. The Designated Safeguarding Lead must be informed as soon as possible.

Treloar's promotes a culture in which students feel safe to talk about their mental health and wellbeing and where seeking help is encouraged. Students will be supported to access trusted adults and appropriate internal or external support whenever concerns arise.

For further information and support please see:

- SMT083 Self-harm and suicide prevention policy
- SMT011 Counselling Policy and Procedures

Peer on peer (or "child on child") abuse

Please see supplementary policy and procedure - Managing allegations against pupils ("peer on peer abuse")

Treloar's recognises that peers (whether children or adults) can abuse other peers and that such abuse can occur both inside and outside of school or college, online and offline. All staff should understand that peer-on-peer abuse is a safeguarding issue and should never be dismissed as "banter", "part of growing up", "just having a laugh" or "students being students". Abuse is abuse and will be taken seriously regardless of the age, gender, disability, sexual orientation or role of those involved.

Peer-on-peer abuse can take many forms and may include:

- Bullying, including cyberbullying, prejudice-based and discriminatory bullying.
- Physical abuse, including hitting, kicking, shaking, biting or other acts of violence.
- Sexual violence.
- Sexual harassment.
- Harmful sexual behaviour.
- Abuse within intimate personal relationships between peers.
- Hazing-type behaviours.
- Initiation rites or activities.
- Coercive or controlling behaviour.
- upskirting (which is a criminal offence), which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or alarm, and initiation/hazing type violence and rituals.
- Image-based abuse, including the sharing of nude or semi-nude images.
- Abuse facilitated through technology, social media, online gaming or artificial intelligence (AI).

Treloar's recognises that peer-on-peer abuse may be associated with power imbalances linked to age, gender, disability, special educational needs, communication ability, social status or perceived vulnerability. Staff should remain alert to the possibility that students may be both victims and perpetrators of abuse and should consider the welfare and support needs of all young people involved.

Reports of peer-on-peer abuse will always be taken seriously. Students who report concerns, or who disclose that they have experienced abuse, sexual violence or sexual harassment, will be

listened to, supported and kept safe. No student should ever be made to feel ashamed, dismissed or responsible for the abuse they have experienced.

Where concerns are identified, Treloar's will undertake an appropriate assessment of risk and need, considering the safety and welfare of the victim, any alleged perpetrator and the wider student community. Decisions will be made on a case-by-case basis by the Designated Safeguarding Lead (DSL) and relevant professionals, taking into account the age, developmental stage and needs of those involved.

Particular consideration will be given to harmful sexual behaviour, sexual harassment and sexual violence. Treloar's adopts a zero-tolerance approach to sexual violence and sexual harassment and recognises the importance of creating a culture where such behaviours are challenged and addressed promptly.

Peer-on-peer abuse may occur between children, between young adults with care and support needs, or between children and young adults where they live, learn or socialise together. Treloar's recognises that the impact of abuse can be equally significant regardless of whether those involved are under or over the age of 18, and safeguarding responses will be proportionate to the circumstances and relevant legal framework.

Any concerns regarding peer-on-peer abuse must be reported immediately to the Designated Safeguarding Lead or deputy DSL in accordance with this policy. Where appropriate, parents, carers, social care, the police and other relevant agencies will be involved to ensure that students receive appropriate protection and support.

Further guidance regarding sexual violence, sexual harassment, harmful sexual behaviour and risk management can be found within Treloar's Peer-on-Peer Abuse Policy and the procedures set out in Part Five of *Keeping Children Safe in Education 2026*.

Transition

At Treloar's we are aware of the added vulnerability that transitions between schools, colleges and care providers can create for students with complex needs. This can create additional safeguarding risks.

Where students leave Treloar's we will typically support the transition, sharing care plans and relevant information, and often supporting with in-person visits from therapists and other staff. If safeguarding concerns are raised at any point during the transition staff should communicate these directly with the safeguarding lead of the provider concerned, unless to do so would place the student at risk of significant harm. The Head of Safeguarding should be informed of all such concerns to support both partnership working and onward referral if necessary.

Radicalisation & PREVENT

Any student could be at risk of being drawn into terrorism, extremism or non-ideology related extreme violence.

All staff should have an awareness and will be provided with training related to this as part of their safeguarding training.

Should a member of staff be concerned that a student is at risk of radicalisation, extremism or non-ideology related extreme violence they should contact the safeguarding number. The Head of Safeguarding (or a deputy) will manage any onward referral to CHANNEL or PREVENT and consider any wider needs or risks.

Female Genital Mutilation (FGM)

FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs for non-medical reasons. It has no health benefits and harms girls and women in many ways. It involves removing and damaging healthy and normal female genital tissue, and hence interferes with the natural function of girls' and women's bodies.

The age at which girls undergo FGM varies enormously according to the community. The procedure may be carried out when the girl is newborn, during childhood or adolescence, just before marriage or during the first pregnancy. However, the majority of cases of FGM are thought to take place between the ages of 5 and 8 and therefore girls within that age bracket are at a higher risk.

FGM is illegal in the UK.

On the 31 October 2015, it became mandatory for teachers to report known cases of FGM to the police. 'Known' cases are those where either a girl informs the person that an act of FGM – however described – has been carried out on her, or where the person observes physical signs on a girl appearing to show that an act of FGM has been carried out and the person has no reason to believe that the act was, or was part of, a surgical operation within section 1(2)(a) or (b) of the FGM Act. In these situations, the Head of Safeguarding will be informed and they will support the member of teaching staff to contact the police to report suspicion that FGM has happened.

At no time will staff examine pupils to confirm concerns, although if concerns are noted during routine provision of intimate care they will be referred in the same manner.

For cases where it is believed that a girl may be vulnerable to FGM or there is a concern that she may be about to be genitally mutilated, the staff will inform the Head of Safeguarding who will report it as with any other child protection concern.

Safeguarding Records

Safeguarding matters will be recorded securely by the Head of Safeguarding in a confidential file for each student.

For students who leave Treloar's to attend another education setting this file will be sent with the student in line with KCSIE. This is to allow the new school or college to continue supporting children who have had a social worker and been victims of abuse and have that support in place for when the child arrives. This is a legal duty under GDPR and thus consent is not required.

Where students join Treloar's it is the responsibility of the previous setting to transfer safeguarding records to Treloar's, as set out in KCSIE. Treloar's Head of Safeguarding will support this by making efforts to contact the settings of previous settings to both remind them of this requirement and to request details. Where relevant safeguarding information emerges the Head of Safeguarding will look to share this with SMT and relevant staff.

External Notification & Investigation

When a safeguarding issue arises as defined by Hampshire Safeguarding Children Partnership (HSCP) or Hampshire Safeguarding Adult Board (HSAB) procedures, the Head of Safeguarding or their deputy will alert relevant authorities. If the harm has occurred at Treloar's or involved Treloar's staff or volunteers a referral will be made to Hampshire County Council Children or Adult Services as relevant in line with HSCP and HASB procedures, with notification to the Local

Authority Designated Officer. If a criminal offence appears to have been committed or alleged the police will also be informed. The students funding authority will also be informed.

CQC will be notified of referrals for safeguarding matters in the areas that they have responsibility. If the harm relates to students' home or home area, the home local authority will be notified as any investigation will be their responsibility. If there is doubt, for example it is not clear where an injury occurred, Hampshire County Council must always be notified. If there is any dispute or concern that Local Authorities are not taking appropriate responsibility with regards to a safeguarding concern the Head of Safeguarding will escalate this in line with Local Safeguarding Adult/Children's Board procedures for the relevant authority.

Treloar's is registered with the Charity Commission, and has a duty to notify regarding a "serious incident", for example where:

- a student or tenant has been or is being abused or mistreated while under our care or by someone connected with Treloar's;
- there's been an incident where someone has been abused or mistreated and this is connected with the activities of Treloar's; or
- there has been a breach of procedure or policies at Treloar's which has put beneficiaries at risk – including the failure to carry out proper checks before appointing trustees, governors, staff or volunteers.

Employment

Treloar's has detailed policies detailing

- safer recruitment practice;
- our Code of Conduct ("Safer Working Practice Guidelines");
- allegations management

These policies will relate to employed staff, contractors, trainee teachers, volunteers, governors and trustees and look to create a culture where Safeguarding is of paramount importance, and continues throughout employment, not just at the point of recruitment. An attitude of "**it could happen here**" is vital.

All those recruited to Treloar's will undergo pre-employment vetting in line with our Safer Recruitment policy.

If a member of staff has any concerns about the behaviour or conduct of a member of staff, volunteer, visitor or other person with access to students at Treloar's they should be prepared to

challenge the behaviour, make sure that students are safe and contact safeguarding as soon as possible.

This would also include “low-level” concerns and where others feel “uncomfortable” about behaviour or conduct.

Safeguarding and “Quality”

Treloar’s seeks to fully embrace a culture of quality improvement, with “striving for excellence” a key Treloar value.

Where quality of care does not meet the standards that we aspire to this can present risks to the safety and welfare of those in our care. The distinction between poor practice, a quality concern and a safeguarding concern is not always easy to determine.

Hampshire Safeguarding Adult Board provides the following guidance (Hampshire Safeguarding Adult Board, 2023):

> *There are a number of factors to consider when determining if a quality concern is also a safeguarding concern or not.*
>
> *You will need to make a decision if the concerns are quality of care issues that do not require action under the safeguarding process and could be managed under a quality framework this could be:*
>
> - *Where it is a ‘one off’ incident to one individual (where there is no pattern/history/trend).*
> - *Resulted in no harm to the adult or others.*
> - *Where there is a clearly defined action to address the quality of care in a person-centred way.*

Where there are quality concerns (e.g. medicine errors, pressure wounds, concerns about care), at Treloar’s we will look to manage in line with the above guidance, acknowledging that the majority these will have some safeguarding element, but may not meet the children’s (significant harm) or adult’s (adult with care and support needs, suffering abuse or neglect) thresholds.

Where possible we will look to share information in the interest of transparency about quality concerns, and actions taken to address these irrespective of safeguarding thresholds.

Please see respective Medication and Skin Integrity policies for further information about these specific areas.

Links with Other Policies and Procedures

- Managing allegations against pupils (“peer on peer abuse”)
- Disciplinary and Capability Procedures
- Whistleblowing Policy
- Restraint Policy
- Deprivation of Liberty Safeguards – Practice and Procedures
- Sexuality and Further Education (SAFE)
- Recruitment Policy and Procedures
- Safer Working Practice Guidelines (“Code of Conduct”)
- Confidentiality and Disclosure of Information
- Harassment and Bullying Policy
- Supervision Policy
- DBS Policy
- E-Safety Policy
- Anti-bullying policy
- Looked after children policy
- Missing children Policy
- Visitors and Guest Speakers Policy
- Mental Capacity Act Policy

Communication Requirements

How will the Policy/procedure be communicated:	SharePoint School and College Briefings Team meetings Safeguarding Training
Who will ensure the above communication is carried out:	Head of Safeguarding Managers

Do the changes made to this policy/procedure affect any other policies/procedures? If yes, has this been communicated to the policy/procedure author/owner	No

Monitoring and Review

The effectiveness of the policy will be monitored through safeguarding Quality Assurance processes.

Revision History

- 2016 - Changes to incorporate changes in Government Guidance, Keeping Children Safe in Education 2016 and Care Act 2014 Guidance
- 2016 - Additional duty to report suspected FGM
- 2017 - Reporting changes dictated by EFSA contract
- 2018 – Updated to incorporate Working Together 2018 & KCSiE 2018
- 2019 – references to Safeguarding Board amended to Safeguarding Partnership
  Updated re: KCSiE 2019
  Clarified training arrangements
  Introduced clearer “Safeguarding Whistleblowing” appendix for clarity
  Quick Guide added to start
  Appendix 4 – sexual behaviour information and risk assessment added in line
  Appendix 8 – revised to include information on definition of concerns, complaints and allegations
- 2020 o Updates in line with KCSIE2020 o reference to Principal/CEO also being a DSL
  - Additional information regarding DSL role in promoting welfare of children with a social worker
  - Addition to “managing allegations” appendix regarding transferrable harm
- 2021 o Updates in line with KCSIE 2021
  - Improved information for staff regarding “what to do”

- Additional information regarding responsibilities to CIN/CLA students o Information regarding safeguarding records

April 2022

- o Formatting and date revision
- o Amended “headteacher” to correctly refer to “Principal/CEO”
- o Added “apprentices” to scope of policy given registration as an Apprenticeship Provider

August 2022

- Contents page added to improve accessibility for those with screen readers
- Updates in line with KCSIE 2022 o P15 – added section on Transition o P13 – Revision to CIN information o P14 – Safeguarding records clarified
- Appendix 3 – types of abuse – visual representation provided, with link to KCSIE as appropriate reference source
  - August 2023 o Updates in line with KCSIE 2023 o P8 further clarification about training for all staff, regardless of role o Appendix 8 – more information added in the introduction section regarding allegations
    - Removal of EY safeguarding appendices as Nursery is no longer open
  - August 2024
    - o Adding in of exploitation (where neglect is covered)
    - o Definition of peer to peer abuse
    - Made it clear we may need to report to multiple LAs as students placed not just from local LA
    - Section added on Adults with care and support needs
  - August 2025
    - Addition of HSCP Toolkits and resources
    - Revision of definition of “parent” in line with DfE guidance
  - August 2026
    - Revision in line with KCSIE 2026
    - All staff to read part one of KCSIE
    - Added content around online safety
    - Clarified “peer-on-peer” as opposed to child-on-child
    - Added mental health info
    - New support tool for out of hours managers

November 2026

- Revisions following Governor/Trustee review:
  - Adjusted allegations process following Principal/CEO now being same role (report to chair of trustees)

Further sources of information:-

- Working Together to Safeguard Children
- Keeping Children Safe in Education
- Care Act Guidance
- Mental Capacity Act 2005 Code of Practice
- HSAB Safeguarding Policy
- HSCP Child Protection Procedures
- What to do if you are worried a child is being abused

See links in Appendices for relevant further information

IMPORTANT NOTES:

It is essential for those with designated responsibilities to familiarise themselves with the sources of information, referred to above.

Policy documents describe mandatory minimum standards and will be subject to audit and review. Line managers are required to ensure suitable and sufficient arrangements are in place to meet policy requirements, including the provision of information and instruction to staff.

Appendix 1 - Staff safeguarding guidelines for when harm is suspected, disclosed or witnessed

CONCERNED ABOUT A STUDENT?

IF IN DOUBT SPEAK OUT – CALL 07825 262 418

These guidelines include:-

- What to do if you are worried a student is being harmed or at risk of being harmed.
- Staff conduct when faced with a student says they have been abused or are at risk of abuse.
- Flowchart of procedures to follow when abuse is witnessed or disclosed
- Further explanation of flowchart.

Please also see "What to do if you're worried a child is being abused: Advice for Practitioners"

What to do if you are worried a student is being harmed or at risk of being harmed.

If you are worried a student may have been harmed or at risk you must discuss the concerns with your manager or the Head of Safeguarding[2] in person or by phone without delay. The whereabouts of the Head of Safeguarding are held with the Principal/CEO's Office

If the student is in danger, you should first **make sure they are safe**.

If urgent medical attention is needed you should first contact the Health Centre without delay. If the student has marks or injuries contact the Health Centre and request, they provide any necessary medical care and complete a body map on Nourish. If a nurse is not available complete a skin map (see below).

The Head of Safeguarding or the duty safeguarding manager can be contacted on **07825 262418**

The on-call residential manager can be contacted on 07736 080 220

If the Head of Safeguarding is not available a message can be left, but must be followed up if no response is received in an hour. If the Head of Safeguarding is still unavailable, another member of SMT must be contacted. If in doubt, discuss with your senior. If the concern arises out of hours, contact your shift

[2] NB out of hours, the on call residential manager should be contacted.

manager or on call residential manager in the first instance. They may need to liaise further with the on call Safeguarding Manager See below for details

Do not rely on email or any other written communication to make a safeguarding referral – SPEAK TO SOMEONE IN PERSON OR VIA PHONE.

Once the student is safe and you have informed the Head of Safeguarding or a suitable manager, record the details of any incident and email the Head of Safeguarding. This should include:

- Why you are concerned
- If it is an incident, what happened;
- If a student has told you something, use their own words;
- Who witnessed it;
- What action you have taken to protect the student;
- What further action is planned.

What to do if you a student tells you they are being harmed or are worried about being harmed

If a student tells you that they have been abuse or neglected, or if they are frightened, they might be, or if they know some else in that position, follow **the 5 Rs**.

Recognise:

- Listen to what is being said without displaying shock or disbelief
- Accept what is being said without judgement
- Take it seriously

Reassure:

- Reassure the student, but only so far as is honest and reliable
- Don't make promises that you can't be sure to keep, e.g. "I'll stay with you" or "everything will be all right now"
- Don't promise confidentiality – you have a duty to report your concerns.
- Tell the student that you will need to tell some people, but only those whose job it is to protect people
- Acknowledge how difficult it must have been to talk
- Never agree to keep secrets – be honest
- Reassure he or she is right to talk about any worries they may have

Respond

- Listen quietly, carefully and patiently
- Do not investigate, interrogate or decide if the student is telling the truth
- Don't ask leading questions, e.g. "What did he do next?" This assumes he did something next and you don't know that.
- Ask open questions like "Is there anything else that you want to tell me?"
- Do not criticise the alleged abuser; the student may love him/her and criticism may affect any disclosure made
- Do not ask the student to repeat what they have told you to another member of staff. Explain what you have to do next and whom you have to talk to

Record:

- Write up notes of your conversation as soon as possible
- Record the date, time, place, words used by the child and how the child appeared to you – be specific. Record the actual words used, including any swear words or slang, or student words or signs for actions or body parts.
- If any bruises or other injuries are present ask the Health Centre to record these on a body map on Nourish
- Distinguish between fact and opinion. Opinions based on your experience and knowledge are important, but you must give evidence about why you hold an opinion
- Do not assume anything – don't speculate or jump to conclusions

Report

- **Speak to your manager or** phone the Safeguarding Phone - 07825262418
- Don’t rely on email or any other text-based communication
- Email to the Head of Safeguarding a record of your concern

Appendix 2: Managers safeguarding guidelines for when harm is suspected, disclosed or witnessed

These guidelines are written in conjunction with Hampshire child protection and adult safeguarding procedures, and are consistent with them. Nothing in this document overrules those procedures.

Initial response

- Ensure the safety of the individual and if in immediate danger, contact the relevant emergency services e.g. Police, Ambulance, GP as appropriate
- Support and reassure the student, and staff reporting the incident ensuring that staff record what is said and/or observed but avoid asking leading questions
- Ensure staff recorded the incident – ask all for a written account
- Inform the Head of Safeguarding or SMT member in **person or by phone**. The whereabouts of the Head of Safeguarding are held with the Principal/CEO's Office. Follow up in writing the same day.
- If the Head of Safeguarding is not available a message can be left on the safeguarding mobile number, but must be followed up in no response is received within one hour. If the Head of Safeguarding is still unavailable, another member of SMT must be contacted.
- Do not rely on email or any other written communication when making a safeguarding referral.
- Managers must use their discretion and contact another manager if the matter is urgent.
- Ensure in conjunction with Head of Safeguarding a plan to ensure the safety of students
- Ensure all discussions and decisions are recorded
- If a criminal offence may have been committed, make sure evidence is preserved.

Notification

- Liaise with the local authority (including safeguarding referral) if agreed with the Head of Safeguarding. See appendix 7 for guidance.
- Inform parents as appropriate.
- Notify CQC and others as agreed with Head of Safeguarding

NB if Head of Safeguarding is not available then Martin Ingram will in the first instance act as the Deputy Designated Safeguarding lead, or failing that the on call SMT manager or any other SMT member should be contacted

Out of hours

See appendix 6 of the safeguarding policy.

Allegations against staff

Refer to appendix 8

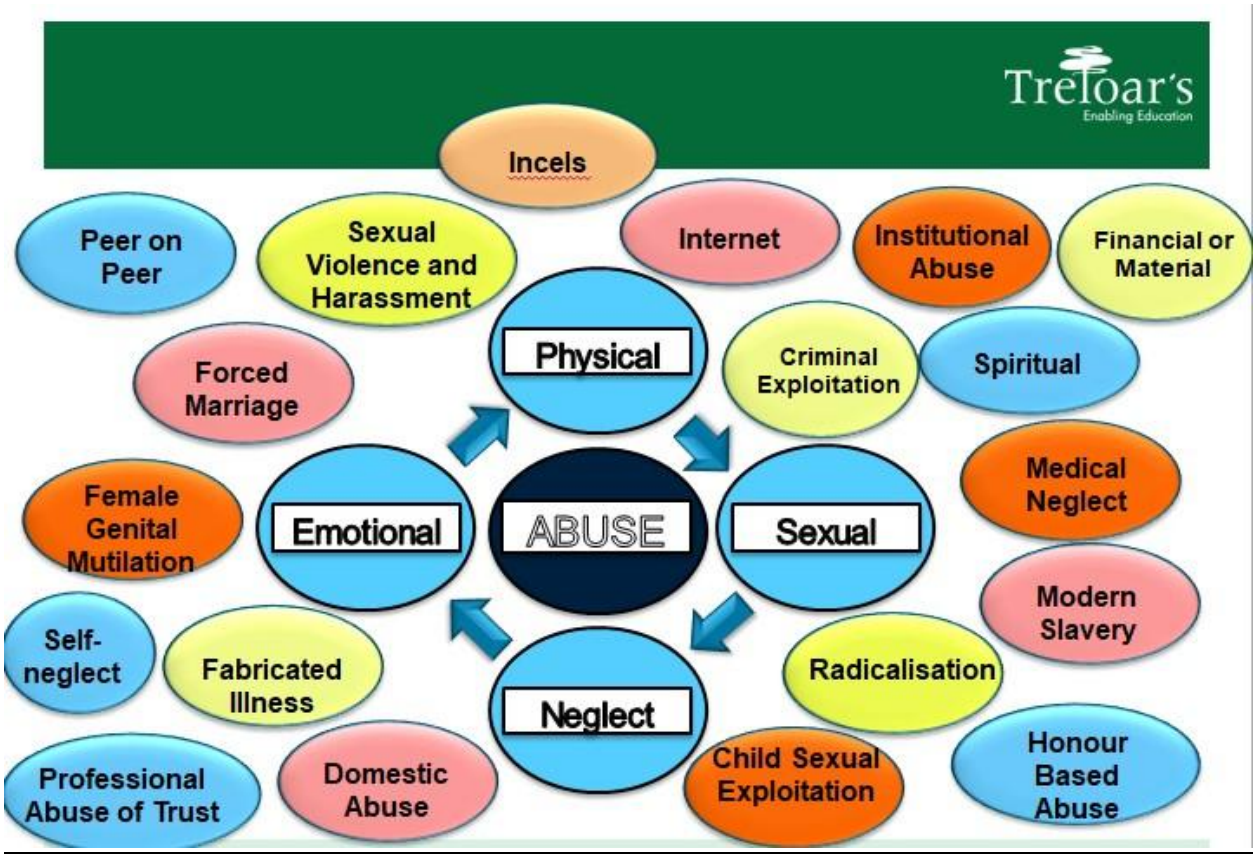
On call Safeguarding Manager guidelines

See appendix 7

Appendix 3 - Types of abuse

For further information please see PART ONE of Keeping Children Safe in Education

Below is a visual illustration of different types of abuse or harm which could affect students at Treloar's:



Appendix 4 – Sexual Behaviour in children and young people

Please also see SMT048 Managing Allegations Against Pupils if concerned about students posing a risk of sexual harm to others

Brook sexual behaviours traffic light tool – training is available, please contact HR

Behaviours: age 0 to 5

All green, amber and red behaviours require some form of attention and response. It is the level of intervention that will vary.

What is a green behaviour?

Green behaviours reflect safe and healthy sexual development. They are displayed between children or young people of similar age or developmental ability. They are reflective of natural curiosity, experimentation, consensual activities and positive choices

What can you do?

Green behaviours provide opportunities to give positive feedback and additional information.

Green behaviours

- holding or playing with own genitals
- attempting to touch or curiosity about other children's genitals
- attempting to touch or curiosity about breasts, bottoms or genitals of adults
- games e.g. mummies and daddies,
- doctors and nurses
- enjoying nakedness
- interest in body parts and what they do
- curiosity about the differences between boys and girls

What is an amber behaviour?

Amber behaviours have the potential to be outside of safe and healthy behaviour. They may be of potential concern due to age, or developmental differences. A potential concern due to activity type, frequency, duration or context in which they occur.

What can you do?

Amber behaviours signal the need to take notice and gather information to assess the appropriate action.

Amber behaviours

- preoccupation with adult sexual
- behaviour
- pulling other children's pants down/skirts up/trousers down against their will
- talking about sex using adult slang
- preoccupation with touching the genitals of other people
- following others into toilets or changing rooms to look at them or touch them
- talking about sexual activities seen on TV/online

What is a red behaviour?

Red behaviours are outside of safe and healthy behaviour. They may be excessive, secretive, compulsive, coercive, degrading or threatening and involving significant age, developmental, or power differences. They may pose a concern due to the activity type, frequency, duration or the
context in which they occur

What can you do?

Red behaviours indicate a need for immediate intervention and action.

Red behaviours

- persistently touching the genitals of other children
- persistent attempts to touch the genitals of adults
- simulation of sexual activity in play
- sexual behaviour between young children involving penetration with objects
- forcing other children to engage in sexual play

This is intended to be used as a guide only. Please refer to the guidance tool at https://www.brook.org.uk/our-work/the-sexualhttps://www.brook.org.uk/our-work/the-sexual-behaviours-traffic-light-toolbehaviours-traffic-light-tool for further information

Print date: 01/10/2015 - Brook has taken every care to ensure that the information contained in this publication is accurate and up to-date at the time of being published. As information and knowledge is constantly changing, readers are strongly advised to use this information for up to one month from print date. Brook accepts no responsibility for difficulties that may arise as a result of an individual acting on the advice and recommendations it contains.
Brook sexual behaviours traffic light tool adapted from Family Planning Queensland. (2012). Traffic Lights guide to sexual behaviours. Brisbane: Family Planning Queensland, Australia.

Behaviours: age 5 to 9 and 9 to 13

All green, amber and red behaviours require some form of attention and response. It is the level of intervention that will vary.

What is a green behaviour?

Green behaviours reflect safe and healthy sexual development. They are displayed between children or young people of similar age or developmental ability and reflective of natural curiosity, experimentation, consensual activities and positive choices

What can you do?

Green behaviours provide opportunities to give positive feedback and additional information.

Green behaviours 5-9

- feeling and touching own genitals
- curiosity about other children's genitals
- curiosity about sex and relationships, e.g. differences between boys and girls, how sex happens, where babies come from, same-sex relationships
- sense of privacy about bodies
- telling stories or asking questions using swear and slang words for parts of the body

Green behaviours 9-13

- solitary masturbation
- use of sexual language including swear and slang words
- having girl/boyfriends who are of the same, opposite or any gender
- interest in popular culture, e.g. fashion, music, media, online games, chatting online
- need for privacy
- consensual kissing, hugging, holding hands with peers

What is an amber behaviour?

Amber behaviours have the potential to be outside of safe and healthy behaviour. They may be of potential concern due to age, or developmental differences. A potential concern due to activity type, frequency, duration or context in which they occur.

What can you do?

Amber behaviours signal the need to take notice and gather information to assess the appropriate action.

Amber behaviours 5-9

- questions about sexual activity which persist or are repeated frequently, despite an answer having been given
- sexual bullying face to face or through texts or online messaging
- engaging in mutual masturbation
- persistent sexual images and ideas in talk, play and art
- use of adult slang language to discuss sex

Amber behaviours 9-13

- uncharacteristic and risk-related behaviour, e.g. sudden and/or provocative changes in dress, withdrawal from friends, mixing with new or older people, having more or less money than usual, going missing
- verbal, physical or cyber/virtual sexual bullying involving sexual aggression
- LGBT (lesbian, gay, bisexual, transgender) targeted bullying
- exhibitionism, e.g. flashing or mooning
- giving out contact details online
- viewing pornographic material
- worrying about being pregnant or having STIs

What is a red behaviour?

Red behaviours are outside of safe and healthy behaviour. They may be excessive, secretive, compulsive, coercive, degrading or threatening and involving significant age, developmental, or power differences. They may pose a concern due to the activity type, frequency, duration or the context in which they occur

What can you do?

Red behaviours indicate a need for immediate intervention and action.

Red behaviours 5-9

- frequent masturbation in front of others
- sexual behaviour engaging significantly younger or less able children
- forcing other children to take part in
- sexual activities
- simulation of oral or penetrative sex
- sourcing pornographic material online

Red behaviours 9-13

- exposing genitals or masturbating in public
- distributing naked or sexually provocative images of self or others
- sexually explicit talk with younger
- children
- sexual harassment
- arranging to meet with an online acquaintance in secret
- genital injury to self or others
- forcing other children of same age, younger or less able to take part in sexual activities
- sexual activity e.g. oral sex or intercourse
- presence of sexually transmitted infection (STI)
- evidence of pregnancy

This is intended to be used as a guide only. Please refer to the guidance tool at https://www.brook.org.uk/our-work/the-sexualhttps://www.brook.org.uk/our-work/the-sexual-behaviours-traffic-light-toolbehaviours-traffic-light-tool for further information

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Brook sexual behaviours traffic light tool adapted from Family Planning Queensland. (2012). Traffic Lights guide to sexual behaviours. Brisbane: Family Planning Queensland, Australia.

Behaviours: age 13 to 17

All green, amber and red behaviours require some form of attention and response. It is the level of intervention that will vary.

This is intended to be used as a guide only. Please refer to the guidance tool at https://www.brook.org.uk/our-work/the-sexual-behaviours-traffic-lighthttps://www.brook.org.uk/our-work/the-sexual-behaviours-traffic-light-tooltool for further information

Print date: 01/10/2015 - Brook has taken every care to ensure that the information contained in this publication is accurate and up-to-date at the time of being published. As information and knowledge is constantly changing, readers are strongly advised to use this information for up to one month from print date. Brook accepts no responsibility for difficulties that may arise as a result of an individual acting on the advice and recommendations it contains.

Brook sexual behaviours traffic light tool adapted from Family Planning Queensland. (2012). Traffic Lights guide to sexual behaviours. Brisbane: Family Planning Queensland, Australia.

What is a green behaviour?

Green behaviours reflect safe and healthy sexual development. They are displayed between children or young people of similar age or developmental ability and reflective of natural curiosity, experimentation, consensual activities and positive choices

What can you do?

Green behaviours provide opportunities to give positive feedback and additional information.

Green behaviours

- solitary masturbation
- sexually explicit conversations with peers
- obscenities and jokes within the current cultural norm
- interest in erotica/pornography
- use of internet/e-media to chat online
- having sexual or non-sexual relationships
- sexual activity including hugging, kissing, holding hands
- consenting oral and/or penetrative sex with others of the same or opposite gender who are of similar age and developmental ability
- choosing not to be sexually active
- receipt of gifts or money in exchange for sex

What is an amber behaviour?

Amber behaviours have the potential to be outside of safe and healthy behaviour. They may be of potential concern due to age, or developmental differences. A potential concern due to activity type, frequency, duration or context in which they occur.

What can you do?

Amber behaviours signal the need to take notice and gather information to assess the appropriate action.

Amber behaviours

- accessing exploitative or violent pornography
- uncharacteristic and risk-related behaviour, e.g. sudden and/or provocative changes in dress,
- withdrawal from friends, mixing with new or older people, having more or less money than usual, going missing
- concern about body image
- taking and sending naked or sexually provocative images of self or others
- single occurrence of peeping, exposing, mooning or obscene gestures
- giving out contact details online
- joining adult- only social networking sites and giving false personal information
- arranging a face to face meeting with an online contact alone

What is a red behaviour?

Red behaviours are outside of safe and healthy behaviour. They may be excessive, secretive, compulsive, coercive, degrading or threatening and involving significant age, developmental, or power differences. They may pose a concern due to the activity type, frequency, duration or the context in which they occur

What can you do?

Red behaviours indicate a need for immediate intervention and action.

Red behaviours

- exposing genitals or masturbating in public
- preoccupation with sex, which interferes with daily function
- sexual degradation/humiliation of self or others
- attempting/forcing others to expose genitals
- sexually aggressive/exploitative behaviour
- sexually explicit talk with younger children
- sexual harassment
- non-consensual sexual activity
- use of/acceptance of power and control in sexual relationships
- genital injury to self or others
- sexual contact with others where there
- is a big difference in age or ability
- sexual activity with someone in authority and in a position of trust
- sexual activity with family members
- involvement in sexual exploitation and/or trafficking
- sexual contact with animals

Sexual Violence and Sexual Harassment between Children Risk and Needs Assessment Template

(This template is offered as a framework and should be seen as a starting point for development to fit your school's individual context. Each reported incident should be managed on a case-by-case basis) **EXAMPLE assessment**

Brook Traffic Light Assessment	What are the risks? Who might be harmed & how?	Action	Action by Who?	Action by when?	Action status or Date Completed & Outcome including further actions
Red Behaviour: Forcing other children to engage in sexual activity. Subject is a male child. A female child has been taken into the boys' toilets. Subject has exposed himself, grabbed the girl by the wrist and forced her to touch his genitals. Subject is under the age of criminal responsibility. Subject has no known CP history There have been no previous concerns about the Subject.	All pupils in the class may be forced or coerced into sexual activity. Early indication is that female pupils may be more at risk.	Key members of staff with supervisory responsibility have been briefed by the DSL and will increase monitoring at break times. Subject will be escorted to the toilet.	DSL Staff AB, CD & EF ELSA	From Immediate effect	✓01/02/2019. Increased monitoring & toilet supervision in place
	Other children within the community	Subject's parents Informed re: Incident & behaviour and the risk plan put in place. Made aware of referral to CSD. Agreement for • Referral to CAMHS • Increased monitoring & toilet. supervisor • Keep safe work.	DSL	01/02/19	✓01/02/19 Contract of agreement has been signed by the parents to include increased. monitoring, toilet supervision and keep safe work.
		Referral to Children's social care	DSL	01/02/19	✓01/02/19 Children & Family Assessment to be completed by CAST
		Victim's parents informed, and child's views gained. Child offered keep safe work.	DSL	01/02/19	✓Parents are satisfied with the school's actions & safeguarding measures so far. Child & family want child to remain in the same class. Keep safe work accepted.
		Referral to CAMHS	DSL	02/02/19	Referral made. ACTION – follow up with CAMHS as to the status of referral after 10 working days if not heard before

		Safeguarding measures to be reviewed.	DSL & key Staff members	09/02/19	No additional concerns raised. ACTION - Review plan again in one week's time
Brook Traffic Light Assessment	**What are the risks? Who might be harmed & how?**	**Action**	**Action by Who?**	**Action by when?**	**Action status or Date Completed & Outcome including further actions**
		Keep safe work to be completed. Combination of whole class and targeted work to be carried out	ELSA	23/02/2019	OUTSTANDING Work planned and due to be delivered w/c 16/02
	Community Impact Assessment LOW The parents of the Subject and the victim are satisfied that the school is taking all necessary safeguarding measures to manage the risk. There are no indications at this stage for community unrest. This will be kept under review.	DSL and SLT to be aware of any community noises about the incidents.	DSL and SLT	05/04/2019	
	Media Media and communication team to be informed if community impact assessment risk increases	SLT to contact HCC communication team if required. Monitor during term	SLT	05/04/2019	
	Information Sharing. All information sharing has been completed in line with the school's CP and GDPR policies.	Relevant information to be recorded on each child's CP file as required.			
	Social Media There are no currents risks from community use of social media. This will be kept under review.	Monitoring of social media during the term	Key staff	05/04/2019	

Brook Traffic Light Assessment	What are the risks? Who might be harmed & how?	Action	Action by Who?	Action by when?	Action status or Date Completed & Outcome including further actions
Red Behaviour:					

Brook Traffic Light Assessment	What are the risks? Who might be harmed & how?	Action	Action by Who?	Action by when?	Action status or Date Completed & Outcome including further actions
Red Behaviour:					
Amber Behaviour:					

Appendix 5 –Challenge - staff guide



Staff Guide

Worried about a student?



Discuss with shift leader



If you cannot find shift leader or are still worried



Phone on call Res. Manager



If still worried - phone safeguarding 07825 262418

Appendix 6: Out of Hours Safeguarding Managers' Guide

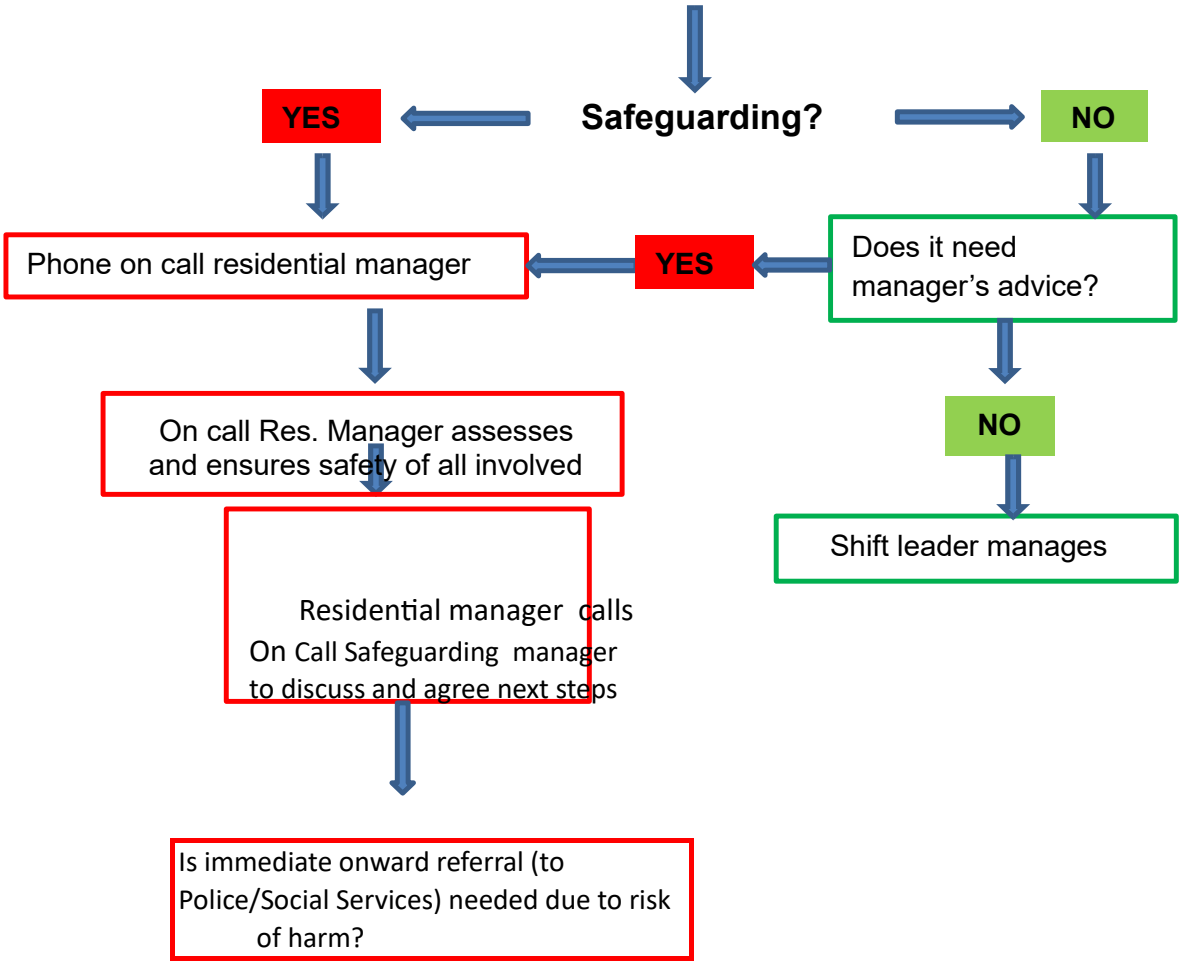


Safeguarding support tool for managers – follow link above

Guidance based on Treloar Policies, KCSIE, Hampshire Children's Services and Hampshire Adult Services guidance.

All managers should use discretion when using support tool.

Concern reported to Shift-leader



*NB if on call residential manager cannot reach safeguarding, they should act in accordance with guidelines

Appendix 7 - Safeguarding on-call Guidelines for Safeguarding Manager

These guidelines are for the on-call safeguarding manager when they are contacted by staff. The guidelines are not prescriptive and are not a substitute for professional judgement at the time, e.g., several minor assaults may require referral. *If in doubt it is best to refer.* Referral means contacting the relevant agency to report the incident or concern.

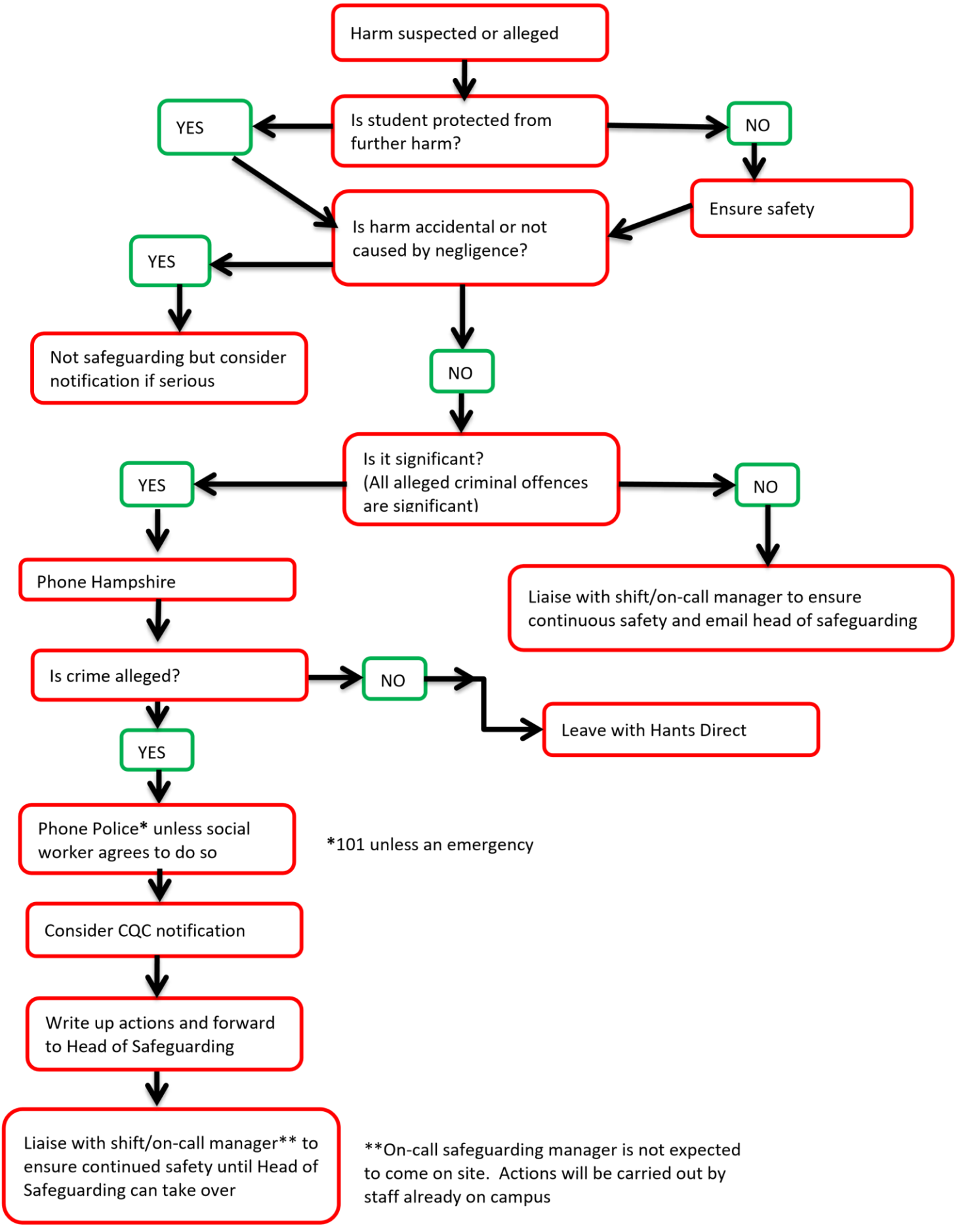
Role of on-call safeguarding manager

- To instruct staff on actions to take to safeguard students.
- To ensure correct processes are followed when a safeguarding incident arises
- To contact external agencies, e.g. local authorities, police, when necessary or ensure it is done

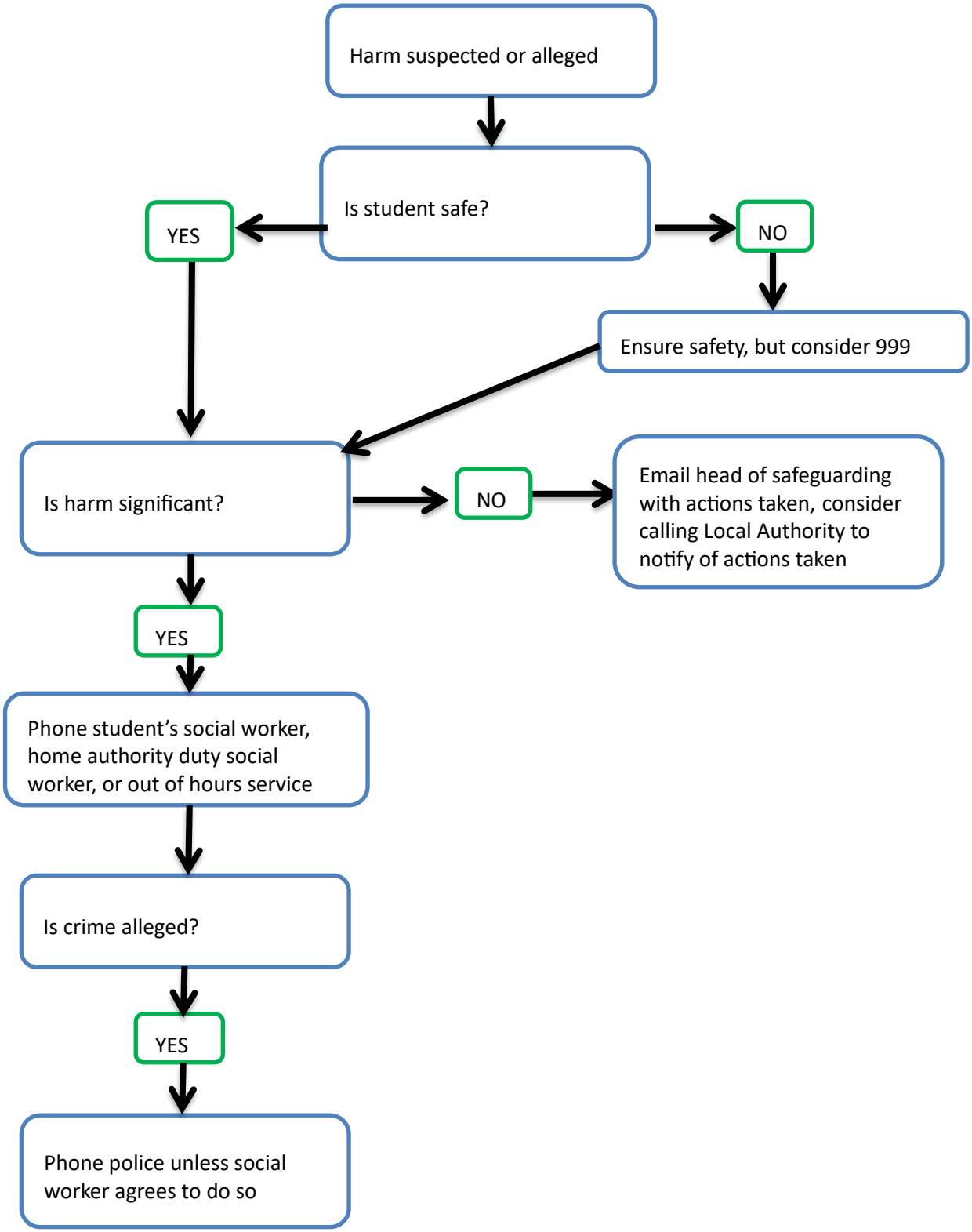
Classification

Safeguarding cases are divided into Internal and External concerns. There are different referral points depending on whether the student is a child (i.e. under 18) or an adult.

N.B. It is not relevant whether it is school or college for safeguarding purpose; the age is the important factor.


Harm suspected or alleged
Is student protected from further harm?
YES
NO
Ensure safety
Is harm accidental or not caused by negligence?
YES
Not safeguarding but consider notification if serious
NO
Is it significant?
(All alleged criminal offences are significant)
YES
NO
Phone Hampshire
Liaise with shift/on-call manager to ensure continuous safety and email head of safeguarding
Is crime alleged?
NO
Leave with Hants Direct
YES
Phone Police* unless social worker agrees to do so
*101 unless an emergency
Consider CQC notification
Write up actions and forward to Head of Safeguarding
Liaise with shift/on-call manager** to ensure continued safety until Head of Safeguarding can take over
**On-call safeguarding manager is not expected to come on site. Actions will be carried out by staff already on campus

EXTERNAL


Harm suspected or alleged
Is student safe?
YES
NO
Ensure safety, but consider 999
Is harm significant?
NO
Email head of safeguarding with actions taken, consider calling Local Authority to notify of actions taken
YES
Phone student's social worker, home authority duty social worker, or out of hours service
Is crime alleged?
YES
Phone police unless social worker agrees to do so

Appendix 8 - Allegations against staff procedure

Working Together to Safeguard Children states that organisations should have clear policies in line with those from the LSCB for dealing with allegations against people who work with children. Those policies should make a clear distinction between an allegation, a complaint or a concern about the quality of care or practice.

At Treloar's we are committed to supporting staff to raise all worries they may have, be they in relation to allegations, complaints or low-level concerns, as voicing these, and taking action in response, is key to creating a safe and open culture.

If you are unsure as to whether something is an allegation, a complaint or a low-level concern you should call the safeguarding number (07825 262 418) without delay.

Allegations as defined by KCSiE should be reported to the LADO. Complaints or concerns can be managed independently by the school or college under internal procedures.

Keeping Children Safe in Education defines an **allegation** as being where someone states or believes that an employee or volunteer has:

- behaved in a way that has **harmed a student**, or **may have harmed a student**;
- possibly **committed a criminal offence** against or related to a student; or
- behaved towards a student in a way that indicates he or she would pose **a risk of harm** if they work regularly or closely with children or adult with care and support needs.
- behaved or may have behaved in a way that indicates they may not be suitable to work with children.

Complaints could include:-

- Failure to follow policy, procedure or guidance
- Any breach of data protection or confidentiality
- Poor behaviour management
- Inappropriate use of social media
- Misadministration of medication

Concerns could include:-

- Inappropriate use of language, shouting or swearing
- Discussing personal or sexual relationships with, or in the presence, of pupils
- Making (or encouraging others to make) unprofessional comments which scapegoat, demean or humiliate children, or might be interpreted as such.
- Breaches of the Code of Conduct

Concerns and complaints should be addressed in line with Treloar's Complaints and Disciplinary procedures, with clear record made of decision making.

In dealing with **allegations** relating to the conduct of someone working, or volunteering at Treloar's:

- First, ensure that students are safe from harm, or risk of harm
- Report any concerns about the conduct of any member of staff or volunteer to the Head of Safeguarding (07825 262 418) as soon as possible.
- If an allegation is made against the Head of Safeguarding, the concerns need to be raised with Principal/CEO as soon as possible.
- If an allegation is made against the Principal/CEO, the concerns need to be raised with Head of Safeguarding or Safeguarding Governor as soon as possible. The Safeguarding Governor's contact details can be obtained from clerktogovernors@treloar.org.uk, or from the CEO's PA office in the TRAILL.

- Once an allegation has been received by the Head of Safeguarding, Principal/CEO or Safeguarding Governor they will:

    - Contact the Local Authority Designated Officer - 01962 876364 (if relating to a child) or Hants Direct Adult referral line - 0300 555 1386 (if relating to an adult).
    - If a criminal offence is alleged the police should also be contacted (101 for non-emergencies) unless the local authority agree that they will do so.

- In liaison with the LADO/Adult Services, Treloar's will determine how to proceed and if necessary, the LADO will refer the matter to Children's Social Care and/or the police.
- Managers must always liaise with HR whenever and allegation is received against a member of staff that may result in disciplinary action, in line with procedures set out in Chapter 4 of KCSiE.
- The student and/or parents should be informed of the allegation unless there is a good reason not to do so.

Further guidance is contained in Keeping Children Safe in Education and the HSCP procedures (for children) or Care Act Guidance (2014) and HSAB procedures (for adults).

Appendix 9 - Safeguarding investigation procedure

Introduction

Safeguarding students from abuse and neglect is fundamental to all work at Treloar's. While most care is carried out in a professional way there will be occasions when students are harmed through the actions of a member of Treloar's staff[3] student or visitor; the harm may or may not have been caused intentionally. There will also be incidents where no harm has ensued, but the actions or omissions of staff members made harm a much greater possibility. In these cases, the Head of Safeguarding or delegate will investigate.

Key responsibilities

The scale and nature of the investigation will depend on the circumstances of incident. The majority of incidents involving staff will be dealt with informally. The need for a formal investigation will be determined by the Principal/CEO or Head of Safeguarding. HR must always be consulted when there is a possibility of disciplinary proceedings under the Disciplinary Policy HR-06 and Disciplinary Procedure HR 06/PR 01.

Information gathering

Before an investigation is commissioned the Head of Safeguarding will gather sufficient information to determine whether it is necessary. An investigation may be carried out owing to the seriousness of the allegation or because it is requested by an interested party, such as a student, a parent or a funder.

Purpose of investigation

The purpose of the investigation is to establish what happened, why and if there are any lessons to be learned. The investigation is not part of disciplinary processes and its function is not to establish blame. The investigation looks into incidents not individuals. However, the information gathered can be used by managers to consider action under other processes as necessary. If the investigation suggests that the practice of a member of staff may put students or others at risk, the investigator will immediately inform the manager.

Formal investigations

Investigations will vary according to circumstance. In some cases, the investigation will stem from a complaint, in others from an internal notification. In some cases, the facts will be clear, in others not. The Head of Safeguarding will determine in consultation with colleagues and other interested parties the scope, timescale and methodology of the investigation.

Timescales

If an allegation is made against a member of staff the quick resolution of that allegation should be a clear priority to the benefit of all concerned.

In response to an allegation staff suspension should not be the default option. An individual should only be suspended if there is no reasonable alternative. If suspension is deemed appropriate, the reasons and the justification should be recorded and the individual notified of the reasons.

It is in everyone's interest to resolve cases as quickly as possible consistent with a fair a thorough investigation. All allegations must be investigated as a priority so as to avoid any delay. The time taken to investigate and resolve individual cases depends on a variety of factors including the nature, seriousness and complexity of the allegation. It is expected that 80 per cent of cases should be resolved within one month, 90 per cent within three months, and all but the most exceptional cases should be completed within 12 months.

[33] For the purpose of this procedure, staff should be understood to refer to all employed staff, bank staff, volunteers, governors, trustees, agency staff, consultants and contractors
Any findings that require urgent attention must be communicated to the relevant manager immediately and not wait until the investigation has been completed.

For cases where it is clear immediately that the allegation is unfounded or malicious then it is expected that they should be resolved within one week. If the investigation finds that the nature of the allegation does not require formal disciplinary action, appropriate action should take place within 3 days. If a disciplinary hearing is required and can be held without further investigation, the hearing should be held within 15 working days.

Scope
These guidelines refer to safeguarding incidents where it is alleged that harm has been caused (or where it is likely harm would have ensued if action not been taken) by fellow students, staff, governors, trustees, contractors, volunteers and visitors. It applies to acts of commission or omission.

Exclusions
Safeguarding incidents that occur when Treloar's does not have a duty of care, e.g., if they occur when within the family or when away from Treloar's in the care of others.

Links to other policies and guidance
In some cases, different investigations will be necessary. It is essential that any safeguarding investigation takes place in liaison with line managers, HR, and external bodies. A safeguarding investigation must not compromise disciplinary investigations, but can be carried out in parallel. The Head of Safeguarding is responsible for ensuring coordination whilst ensuring students' safety.

No formal internal investigations will be carried out if the matter requires reporting to Hampshire County Council as a safeguarding matter until there is agreement with them as to how any investigation will be conducted

Appendix 10 - Safeguarding case review procedure

Introduction
When a serious incident occurs relating to a student it is important for all to carry out a review to determine whether there are lessons to be learned and whether there are any improvements to be made to Treloar's procedures or practice to help prevent similar events in the future.

A case review is not an investigation of the case which will be completed separately. It is a review of policy, procedure and practice

Responsibilities

The Principal/CEO is responsible for commissioning the review and agreeing terms of reference.

The Head of Safeguarding will conduct the review unless otherwise agreed with the Principal/CEO;

TLT and SMT members are responsible for conducting the review on the instructions of the Principal/CEO as appropriate.

Criteria
A review must take place in the following circumstances

When an allegation is substantiated that a member of staff [3]has behaved in a way that: o has harmed a child or adult with care and support needs, or may have harmed a child or adult with care and support needs;
  - possibly committed a criminal offence against or related to a child or adult with care and support needs; or
  - behaved towards a child or children in a way that indicates he or she would pose a risk of harm if they work regularly or closely with children or adult with care and support needs

- Where an alert concerning an internal safeguarding matter results in a child protection or adult safeguarding conference.
- Any other case where the Principal/CEO considers useful lessons may be learned from a review.

Content
Each review will contain its own terms of reference agreed by the Principal/CEO which may include:

- Recruitment;
- Training;
- Supervision and performance;
- Recording;
- Investigation;
- Procedures;
- Management;
- Operation systems.

[3] The phrase member of staff should be interpreted to mean, staff, volunteers, governors, trustees, contractors and any one else commissioned or facilitated to provide services to Treloar's students or tenants.

This list is not exhaustive.

If a member of staff has been suspended the review should consider the decision to suspend the member of staff, the duration of the suspension and whether or not suspension was justified. Lessons should also be learnt from the use of suspension when the individual is subsequently reinstated. The Local Authority Designated Office (LADO) and manager conducting the review should consider how future investigations of a similar nature could be carried out without suspending the individual.

When the review follows a substantiated allegation involving a child or when the substantiated allegation suggests that a member of staff may pose a risk to children, the LADO must be consulted at the start of the review.

The report will include:

- Introduction;
- Terms of Reference;
- Methodology
- A brief narrative of events;
- Findings;
- Conclusions; and
- Recommendations.

Appendix 11 - Whistleblowing in a Safeguarding Context

While the Treloar's has a separate whistleblowing policy, this is a summary sheet that outlines the process when there is a concern that safeguarding issues have not been reported or followed correctly.

This does not replace the whistleblowing policy and should be read in conjunction with the Treloar's policy.

Whistleblowing is a term that is used when staff want to report a concern within their organisation that involves their manager or a person senior to them in the organisation which may prevent them from following the normal reporting systems.

There are a limited number of areas that can be called Whistleblowing, and the policy protects staff from being punished for raising concerns.

Within Treloar's, the Principal/CEO is the senior manager and responsible for all staff.

If you are concerned that any member of staff within the Treloar's is not following safeguarding processes or behaving in a way that is placing children at risk, you should in the first place make the Head of Safeguarding aware, who will notify the Principal/CEO.

If your concern is about the Principal/CEO, you should raise this with the Chair of Trustees. The Head of Safeguarding or Head of HR are available to support this.

If your concern is about the Head of Safeguarding, you should raise this with the Principal/CEO.

If you would prefer to raise your concerns outside of the Treloar's, then you are able to contact the NSPCC whistleblowing line on 0800 028 0285 or email help@nspcc.org.uk for national organisations or make contact with Hampshire County Council on 0300 555 1384.

If you believe that a member of the Treloar's staff is harming a child (an allegation) and this has been reported to the Head of Safeguarding or Principal/CEO (as Designated Safeguarding Leads) and no / insufficient action has been taken, or the member of staff you have concerns about is the Head of Safeguarding or Principal/CEO (as Designated Safeguarding Leads), then you are able to contact the LADOs on 01962 876364 or child.protection@hants.gov.uk . Further information is available at https://www.hants.gov.uk/socialcareandhealth/childrenandfamilies/safeguardingchildren/allegations

If you believe that a child is being abused by individuals outside of Treloar's, you should make a referral to Hampshire Children's Social Care by calling 0300 555 1384 (office hours) or 0300 555 1373 (outside of office hours).

Equality Impact Assessment (EIA) – Stage 1

Name of Policy / Function/Decision	Safeguarding Children and Adults with Care and Support Needs Policy and Procedure
Name of Assessor / Author /Lead	Lorna Woodcroft
Start Date	6th August 6, 2024
This EIA is being undertaken because it is:	• A result of a policy revision

Screening	
Does the policy affect employees, students or other stakeholder groups? Could the impact be significant to that group of people?	Y
Is it a major policy with a significant effect on how our core business is delivered?	Y
Does it involve a significant commitment of resources?	Y
Does it relate to an area where there are known inequalities (e.g. gender pay gap, hate crime, accessibility of IT)	Y
If the answer to any of these questions is 'YES' then continue to complete Equality impact assessment. If you are unsure about the answer to any of these questions please contact EDI Co-ordinator or Head of Quality for further support.	

Has the screening identified the policy as having relevance to the any of the following groups?					
Age	Y	Disability	Y	Sexual Orientation	Y
Race	Y	Sex/Gender	Y	Religion or Belief	Y
Gender Reassignment	Y	Pregnancy or Maternity	Y	Marriage or civil partnership	Y

Have we shown due regard for the 9 protected characteristics within the policy/procedure/decision?	Yes X No ☐
Are all opportunities to promote equality taken within the policy/procedure/decision?	Yes X No ☐
Have we stated how we will monitor the implementation and impact of this policy/decision?	Yes X No ☐
Date of Screening	6th August 2024
Approval by EDI	
Refer Policy/Procedure to EDI Co-ordinator for further Stage 2 Assessment (if required)	Yes ✠ No ☐