

# SAFEGUARDING POLICY

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| Date of Policy                             | September 2018                |
| Approved by Principal                      | September 2018                |
| Next Review Date                           | September 2019                |
| Lead for Review                            | Principal, DSL                |
| Date agreed and ratified by Governing Body | 30 <sup>th</sup> October 2018 |

This policy will be reviewed at least annually and/or following any updates to national and local guidance and procedures.

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## CONTACT NUMBERS - CANTERBURY

|   |                                     |               |
|---|-------------------------------------|---------------|
| Severine Collins                              | Designated Safeguarding Lead        | 07717 884 801 |
| Will Goulder – Assistant Deputy Head Pastoral | Deputy Designated Safeguarding Lead | 07713 311 316 |
| Lucy White – Boarding Manager                 | Deputy Designated Safeguarding Lead | 07500 968 775 |
| Christine Somerton                            | Deputy Designated Safeguarding Lead | 07739 094 249 |
| Sarah Lockyer                                 | Principal                           | 07825 395 584 |
| Stuart White                                  | Safeguarding & Chair of Governors   | 07921 062 862 |

|   |  |   |
|---|--|---|
| Children Social Services (CSS)                                | Central Duty Team                                      | 03000 41 11 11  |
| Children Social Services (CSS)                                | Out of Hours Central Duty Team                         | 03000 41 91 91  |
| Children Social Services - Early Help and Prevention Services | Tier 1 and Tier 2                                      | 03000419222   |
| Local Authority Designated Officer (LADO)                     | LADO Team  | 03000 410 888<br>kentchildrenslado@kent.gov.uk  |
| Area Education Safeguarding Advisor                           | Catherine Holmberg –<br>Catherine.holmberg@kent.gov.uk | 03000418503<br>07786191359  |
| CONTACT/PREVENT Concerns                                      | Quentin Carrington-Moss - 07971452963                  | Quentin.Carrington-Moss@kent.pnn.police.uk<br>channel@kent.pnn.police.uk – referral form to contact point                                       |
| Kent Safeguarding Children’s Board (KCSB)                     | Guidance information on all safeguarding matters       | <a href="http://www.kscb.org.uk/professionals.aspx">http://www.kscb.org.uk/professionals.aspx</a>   |
| DfE non- emergency advice                                     | For staff and governors                                | 02073407264<br>Counter-extremism@education.gsi.gov.uk   |
| Prevent Duty Guidance   |  | <a href="https://www.gov.uk/government/publications/prevent-duty-guidance">https://www.gov.uk/government/publications/prevent-duty-guidance</a> |
| Operation Willow – CSE direct reportable hotline              | Police – quoting operation Willow                      | 101   |
| Say Something helpline  | Anonymous police hotline                               | 116 000   |
| FGM reporting:  | Police   | 101   |
| If the person is already abroad                               | Foreign and Commonwealth Office                        | fcocorrespondence@fco.gov.uk<br>020 7008 1500   |

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| Whistleblowing helpline | NSPCC | 0800 028 0285 (8:00 AM to 8:00 PM Monday to Friday) or email: help@nspcc.org.uk |
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## 1. Introduction

1. CATS Canterbury is a community and all those directly connected (staff, volunteers, governors, parents, families and pupils) have an essential role to play in making it safe and secure. CATS Canterbury recognises our statutory responsibility to safeguard and promote the welfare of all children; and to work together with other agencies to ensure adequate arrangements within our college to identify, assess, and support those children who are suffering or are likely to suffer from harm.
2. This policy has been developed in accordance with the principles established by the Children Acts 1989 and 2004 and related guidance. This includes:
  - o DfE guidance Keeping Children Safe in Education 2018 (KCSIE)
  - o Working Together to Safeguard Children 2018 (WTSC)
  - o Ofsted guidance 'Inspecting safeguarding in early years, education and skills settings' (2018)
  - o Framework for the Assessment of Children in Need and their Families (2000)
  - o Kent and Medway Safeguarding Children Procedures (Online)
  - o Prevent Duty Guidance: for England and Wales (March 2015)
3. Section 175 of the Education Act 2002 requires school governing bodies, local education authorities and further education institutions to make arrangements to safeguard and promote the welfare of all children who are pupils at a school, or who are students under 18 years of age. Such arrangements will have to have regard to any guidance issued by the Secretary of State.
4. All staff believes that our college should provide a caring, positive, safe and stimulating environment that promotes the social, physical and moral development of the individual student.
5. The aims of this policy are:
  - a. To support the student's development in ways that will foster security, confidence and independence.
  - b. To provide an environment in which young people feel safe, secure, valued and respected, feel confident and know how to approach adults if they are in difficulties, believing they will be effectively listened to.
  - c. To raise the awareness of all teaching and non-teaching staff of the need to safeguard children and of their responsibilities in identifying and reporting possible cases of abuse.
  - d. To provide a systematic means of monitoring young people known or thought to be at risk of harm or children in need, and ensure we, the college, contribute to assessments of need and support packages for those children.
  - e. To emphasise the need for good levels of communication between all members of staff.

- f. To develop a structured procedure within the college that will be followed by all members of the college community in cases of suspected abuse.
- g. To develop and promote effective working relationships with other agencies, especially the Police and Social Care.
- h. To ensure that all staff working within our college who have substantial access to children have been checked as to their suitability, and that a central record is kept for audit.
- i. To ensure that when a safeguarding issue is raised, the student's wishes and feelings are taken into account when determining what action to take and what services to provide. Ultimately the systems in place to value and hear from our students will operate with the best interest of the child at their heart.

## 2. Safeguarding Policy Statement

### 1. We will ensure that:

- a. All members of the governing body understand and fulfil their responsibilities, namely to ensure that:
  - There is a Child Protection/Safeguarding policy together with a staff behaviour (code of conduct) policy (See Appendix 5).
  - The college operates safer recruitment procedures by ensuring that there is at least one person on every recruitment panel that has completed the DfE Safer Recruitment training.
  - The college has procedures for dealing with allegations of abuse against staff and volunteers and to make a referral to the DBS if a person in regulated activity has been dismissed or removed due to safeguarding concerns, or would have had they not resigned.
  - A Senior Leader is assigned as Designated Safeguarding Lead (DSL) responsibility. On appointment, the DSL undertakes interagency training, via the KSCB and also undertakes a DSL 'new to role' and an 'update' course every 2 years.
  - Ensure the activities of the DSL can be delegated to appropriately-trained deputies (DDSLs). Whilst the activities of the DSL may be delegated to the deputies, the ultimate lead responsibility for safeguarding and child protection remains with the DSL and this responsibility will not be delegated.
  - All other staff have Safeguarding training updated as appropriate.
  - Any weaknesses in Child Protection are remedied immediately.
  - The CATS Safeguarding Governor, Stuart White, is nominated to liaise with the LA and DOLA on Child Protection issues and in the event of an allegation of abuse made against the Principal.
  - Child Protection/Safeguarding policies and procedures are reviewed annually and the Child Protection/Safeguarding Policy is available on the college intranet and main website.
  - Students are taught a broad and balanced curriculum covering relevant issues through Personal, Social, Health and Economic education (PSHEe).
  - The Recruitment Policy ensures safer recruitment practices in safeguarding young people at the College.

- All staff, paid and unpaid, recognise their duty and feel able to raise concerns about poor or unsafe practice in regard to students and that such concerns are addressed sensitively and effectively in a timely manner in accordance with the whistle-blowing policy.
  - Any concern/allegation of abuse made against a member of staff will be reported straight away to the Principal as the employer and in their absence the Chair of Governors. In cases where the Principal is the subject of a concern/allegation, it will be reported to the Chair of Governors without first notifying the Principal.
- b. The DSL **Severine Collins** is a member of the Senior Leadership Team. The Principal, **Sarah Lockyer**, oversees all child protection/safeguarding issues. The Deputy DSLs are **Will Goulder, Lucy White, Christine Somerton** and **Anna Brzozowska- Kuzniarowska**. These Officers have undertaken the relevant training, and, upon appointment will undertake 'DSL' new to role' training followed by biannual updates.
  - c. The DSL and Senior Leaders who are involved in recruitment and at least one member of the governing body will also complete safer recruitment training (currently on-line on the DfE website) to be renewed every 5 years.
  - d. All members of staff and volunteers are provided with child protection awareness information at induction, including a 'meet the Lead DSL' session, access to the college safeguarding policy and are given a copy of the KCSIE 2018 guidance.
  - e. All members of staff complete the HAYS online e-safeguarding training including anti bullying, peer on peer abuse, online safety, Prevent Duty, FGM, forced marriages, honour-based violence and sexual exploitation, and receive regular updates in online safety and on reporting concerns. The e-Learning training is provided by Hays Training, accredited by Ofsted.
  - f. All other staff and senior leadership group members have child protection awareness training, updated by the DSL as appropriate, to maintain their understanding of the signs and indicators of abuse.
  - g. All members of staff, volunteers, and governors know how to respond to a student who discloses abuse by the first meeting with the DSL.
  - h. All parents/carers are made aware of the responsibilities of staff members with regard to child protection/Safeguarding procedures through publication of the college's Child Protection/Safeguarding Policy.
  - i. Our visitor's policy will seek to ensure the suitability of adults working with children on college sites at any time.
  - j. Community users organising activities for children are aware of the college's child protection guidelines and procedures.
  - k. We refer to the Disclosure and Barring Service (DBS) anyone who has harmed or poses a risk of harm to a child, or if there is reason to believe the member of staff has committed one of a number of listed offences, and who has been removed from working (paid or unpaid) in regulated activity, or would have been removed had they not left. The DBS will consider whether to bar the person. If these circumstances arise in relation to a member of staff at our school, a referral will be made as soon as possible after the resignation or removal of the individual in accordance with advice from the LADO and/or Schools Personnel Service.

2. Our procedures will be regularly reviewed and updated to take into account locally agreed interagency procedures as informed by KCSB. The full KSCB procedures and additional guidance relating to specific safeguarding issues can be found on the KSCB website [www.kscb.org.uk](http://www.kscb.org.uk)
3. The School Leadership Team and DSL will work to establish strong and co-operative relationships with relevant professionals in other agencies.
4. The name of the designated members of staff for Safeguarding and Child Protection, the DSLs and Deputies, will be clearly advertised in the college.
5. All members of staff have been provided with a copy of Part One of “Keeping Children Safe in Education” (2018) which covers Safeguarding information for all staff. School leaders will read the entire document. School leaders and all members of staff who work directly with children will access Annex A within Keeping Children Safe in Education 2018. Members of staff will sign to confirm that they have read and understood Part One and Annex A.
6. The DSL will ensure that all new staff and volunteers (including temporary staff) are aware of the school’s internal safeguarding processes.
7. All staff members (including temporary staff) will receive training to ensure they are aware of a range of safeguarding issues. All staff should be aware of indicators of abuse and neglect so that they are able to identify cases of children who may be in need of help or protection.
8. All staff members (including temporary staff) will receive regular safeguarding and child protection updates, at least annually.
9. All staff members (including temporary staff) will be made aware of the schools expectations regarding safe and professional practice via the staff code of conduct (see Appendix 5).
10. The policy is available publicly on the college website. Parents/carers are made aware of this policy and their entitlement to have a copy of it via the college’s newsletter and website.
11. All staff recognise and accept that abuse can occur in any situation including the home, college, all forms of clubs and societies, and everyone having contact with young people, whether paid or voluntary, has a role to play in safeguarding the welfare of children and preventing their abuse. Staff also recognise that we have a duty to children in need of additional support.
12. The College ensures access to confidential information is restricted to the appropriate staff and the appropriate external authorities.
13. CATS Canterbury recognises that safeguarding within a residential boarding environment is paramount in maintaining a safe and secure safeguarding environment for students. To ensure safeguarding of students the following processes are in place:
  - Exeat process;
  - Curfew Checks;

- House Parents log all visitors in the log book;
- House Parents on duty when Boarding Houses are open;
- Emergency Duty Manager on call after college hours;
- Segregation of ages and gender as appropriate within accommodation. Door alarms set each night in accommodation for students under 17;
- Window restrictors on windows on under 17 residences;
- Shackleton database for dissemination of student Information pertinent to the student care and support required;
- One to one tuition takes place in a classroom with the door open or where there are glass panels in the door;
- Driving student in cars: staff cannot drive students in their own car unless they have business insurance and have logged all documents with the DSL. Any student needing transportation must therefore be by our registered Taxi company whose drivers are all DBS checked.

### 3. Responsibilities

1. The Designated Safeguarding Lead is responsible for:

- Referring a child if there are concerns about possible abuse to the Children’s Social Care Team, and acting as a focal point for staff to discuss concerns. Referrals should be made in writing, following a telephone call using the Single Request for Support Form unless in an emergency. The LOCAL AUTHORITY DESIGNATED OFFICER OR TEAM OF OFFICERS or Education Safeguarding Team will be contacted for advice/guidance. The police will be contacted for a crime that may have been committed.
- Keeping written records of concerns about a child even if there is no need to make an immediate referral. Detailed guidance on Record Keeping is found in a separate document “Guidelines for Safeguarding Record Keeping in Schools”, September 2018 ([https://www.kelsi.org.uk/data/assets/pdf\\_file/0017/65051/Safeguarding-record-keeping-guidelines.pdf](https://www.kelsi.org.uk/data/assets/pdf_file/0017/65051/Safeguarding-record-keeping-guidelines.pdf)).
- Ensuring that all such records are kept confidentially and securely and are separate from student records, until the child’s 25th birthday.
- Ensuring that an indication of the existence of the additional file, as above, is marked on the student’s records.
- Liaising with other agencies and professionals including the Disclosure and Barring Service and/or Police (in cases where a crime may have been committed).
- Ensuring that either they or the staff member attend case conferences, core groups, or other multi-agency planning meetings, contribute to assessments, and provide a report which has been shared with the parents.
- Ensuring that any student currently with a child protection plan who is absent in the educational setting without explanation for two days is referred to their key worker’s Social Care Team.
- Organising Safeguarding induction and update training every 3 years, for all college staff and undertake refresher training every 2 years for Principal, DSL and Deputy DSL.
- Providing, with the Principal, an annual report for the governing body, detailing any changes to the policy and procedures, training undertaken by the DSL and by all staff and

governors, number and type of incidents/cases, and number of children on the child protection register (anonymised).

2. The college will recognise the importance of the role of the DSL and ensure she has the time and training to undertake her duties and will undergo refresher training every 2 years.
3. It is the responsibility of Children Social Services (CSS) and/or the police to determine whether or not abuse has taken place. It is everyone's responsibility to report any concerns. Where there are serious concerns, contact must be made with local agencies within 24 hours in writing.
4. All staff who work with children must comply with this policy in conjunction with the CEG's Staff handbook and Code of Conduct.
5. It is the responsibility of the individual staff member to familiarise themselves with Safeguarding Literature and attend all training provided by CATS Canterbury. At any point staff can take concerns direct to CSS if they deem it necessary.
6. On occasion, staff may pass information about a child to the DSL but remain anxious about action subsequently taken. Staff should feel able to check the progress of a case with the DSL so that they can reassure themselves the child is safe and their welfare is being considered.
7. The college may, under Section 47 of the Children Act 2004, be required to inform other agencies of Child Protection concerns with or without parental/guardian consent.
8. In order to comply with the Children Act 2004, the college will record all students transferring to another school (see Appendix 4) and will inform the school of any child protection issues – This information will be sent by recorded delivery and a telephone check made to ensure the information has been received.

## 4. Supporting Students

1. We recognise that a student who is abused or witnesses violence may feel helpless and humiliated, may blame themselves, and find it difficult to develop and maintain a sense of self-worth.
2. We recognise that the college may provide the only stability in the lives of students who have been abused or who are at risk of harm.
3. We accept that research shows that the behaviour of a child in these circumstances may range from that which is perceived to be normal to aggressive or withdrawn.
4. Our college will support all students by:
  - a. Encouraging self-esteem and self-assertiveness, through the curriculum as well as our relationships, whilst not condoning aggression or bullying.
  - b. Promoting a caring, safe and positive environment within the college.
  - c. Liaising and working together with all other support services and those agencies involved in the safeguarding of children – locally this includes the KELSI process for early intervention services via the Kent safeguarding Children's Board.
  - d. Notifying Social Services as soon as there is a significant concern.

- e. Providing continuing support to a child about whom there have been concerns who leaves the college by ensuring that appropriate information is copied under confidential cover to the child's new setting and ensuring the college's medical records are forwarded as a matter of priority, with relevant permissions.
- f. Encouraging students to gain support via the independent listeners and have help line contact numbers to be able to have independent support outside of the college Community.
- g. Supporting students to learn about and manage online risks effectively and supporting all members of staff to become aware and alert to the need to keep children safe online.

## 5. Recognising Abuse

1. Even for those experienced in working with student abuse, it is not always easy to recognise a situation where abuse may occur, or has already taken place. Whilst it is accepted that staff are not experts at such recognition, staff do have a responsibility under Section 11 of the 2004 Children Act to 'know how to recognise and refer signs of abuse'. (see Appendix 1)
2. All staff have a duty to discuss any concerns they may have about the welfare of a person immediately with their Designated Safeguarding Lead or line manager, or another senior member of staff. All serious concerns must be reported directly to the DSL and the Principal. The DSL and Principal will discuss with the DESIGNATED OFFICER FOR LOCAL AUTHORITY (LADO) OR TEAM OF OFFICERS as per government guidance.
3. Abuse can happen wherever there are children, and children of any age can be abused. The effects of abuse can be damaging and if untreated they may follow a person into adulthood. All staff should have an understanding of abuse and neglect and know how and when to take action.
4. Children with Special Educational Needs (SEN) and disabilities can face additional safeguarding challenges. Additional barriers can exist when recognising abuse and neglect in this group of Children. These can include:
  - Assumptions that indicators of abuse such as behaviour, mood and injury relate to a child's disability without further exploration
  - Children with SEN and disabilities can be disproportionately impacted by bullying- without outwardly showing any signs
  - Children with SEN can have communication difficulties that can be barriers and have difficulty overcoming these

**CATS Canterbury will put in place training and support programmes to ensure that all staff are able to deal effectively with any suspicions of abuse, poor practice or neglect.**

See Appendix 1 for Definitions of Abuse

## 6. Confidentiality

1. We recognise that all matters relating to child protection/safeguarding are confidential.
2. The Principal or DSL will disclose any information about a child to other members of staff on a need to know basis only in line with the Kent sharing Information protocol.
3. All staff must be aware that they have a professional responsibility to share information with other agencies in order to safeguard children.
4. All staff must be aware that they cannot promise a child to keep secrets which might compromise the child's safety or wellbeing.
5. We will always undertake to share our intention to refer a child to Social Care with their parents /carers unless to do so could put the child at greater risk of harm, or impede a criminal investigation. If in doubt, we will consult with the Education Safeguarding Team on this point.

## 7. Supporting Staff

1. We recognise that staff working in the college who have become involved with a child who has suffered harm, or appears to be likely to suffer harm may find the situation stressful and upsetting.
2. We will support such staff by providing an opportunity to talk through their anxieties with the DSL and to seek further support as appropriate.

## 8. Allegations against Staff/Volunteers

1. All college staff/volunteers should take care not to place themselves in a vulnerable position with a child. It is always advisable for interviews or work with individual children or parents to be conducted in view of other adults.
2. All staff/volunteers should be aware of the college's own Staff Code of Conduct (see Appendix 5) policy.
3. Guidance about conduct and safe practice, including safe use of mobile phones by staff and volunteers will be given at induction<sup>1</sup>.
4. We understand that a student may make an allegation against a member of staff or a volunteer.

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<sup>1</sup> Refer to "Guidance for Safe Working Practice for the Protection of Children and Staff in Education Settings" available on the DfE website.

5. If such an allegation is made, or information is received which suggests that a person may be unsuitable to work with children, the member of staff receiving the allegation or aware of the information, will immediately inform the Principal<sup>2</sup>.
6. The Principal on all such occasions will discuss the content of the allegation with the Local Authority Designated Officer (LADO OR TEAM OF OFFICERS) within one working day.
7. If the allegation made by a member of staff concerns the Principal, the person receiving the allegation will immediately inform the CATS Canterbury's Chair of Governors who will consult as in 8.6 above, without notifying the Principal first.
8. The college will follow the LADO OR TEAM OF OFFICERS procedures for managing allegations against staff/volunteers. Under no circumstances will we send a child home, pending such an investigation, unless this advice is given exceptionally, as a result of a consultation with the LADO OR TEAM OF OFFICERS.
9. Suspension of the member of staff/volunteer, excluding the Principal, against whom an allegation has been made, needs careful consideration, and the Principal will seek the advice of the LADO OR TEAM OF OFFICERS and HR in making this decision.
10. In the event of an allegation against the Principal, the decision to suspend will be made by the CATS Canterbury's Chair of Governors with advice as in 8.8 above.
11. Consideration is given to making a referral to the Teaching Regulatory Agency where a teacher has been dismissed (or would have been dismissed had he or she not resigned) and a prohibition order may be appropriate, because of 'unacceptable professional conduct', 'conduct that may bring the profession into disrepute', or a 'conviction at any time for a relevant offence'

## 9. Whistleblowing

1. We recognise that children cannot be expected to raise concerns in an environment where staff fail to do so.
2. All staff should be aware of their duty to raise concerns, where they exist, about the management of child protection, which may include the attitude or actions of colleagues. If it becomes necessary to consult outside the school, they should speak in the first instance, to the Area Education Officer/LADO OR TEAM OF OFFICERS following the Whistleblowing Policy.
3. Whistle-blowing regarding the Principal should be made to the CATS Canterbury Managing Director and Chair of Governors – Stuart White whose contact details are on the front of this policy.

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<sup>2</sup> CATS Canterbury's Chair of Governors - Stuart White, in the event of an allegation against the Principal.

4. The NSPCC Whistleblowing helpline is available for staff who do not feel able to raise concerns regarding child protection failures internally. Staff can call: 0800 028 0285 (8:00 AM to 8:00 PM Monday to Friday) or email: [help@nspcc.org.uk](mailto:help@nspcc.org.uk).

## 10. Physical Intervention

1. We acknowledge that staff must only ever use physical intervention as a last resort, when a child is endangering him/herself or others, and that at all times it must be the minimal force necessary to prevent injury to another person.
2. Staff should adhere to the Use of Reasonable Force policy and any such event should be recorded and signed by a witness.
3. We understand that physical intervention of a nature which causes injury or distress to a child may be considered under child protection or disciplinary procedures.
4. We recognise that touch is not appropriate in the context of working with children, and all staff have been given 'Safe Practice' guidance to ensure they are clear about their professional boundaries.<sup>3</sup>

## 11. Anti-Bullying

1. Our college policy on anti-bullying is set out in a separate document and acknowledges that to allow or condone bullying may lead to consideration under child protection procedures. This includes all forms e.g. cyber, racist, homophobic, gender based violence/sexual assault and sexting. We keep a record of known bullying incidents. All staff are aware that children with SEND and / or differences or perceived differences are more susceptible to being bullied / victims of child abuse.

Please refer to CATS Canterbury's Anti-Bullying Policy and Charter

## 12. Peer on Peer Abuse

1. It is important to recognise that in some cases of abuse, it may not always be an adult abusing a student. An abuser may be a young person, abusing another young person, for example. Peer to Peer abuse can be gender based and include: sexting/sexual assault/initiation/hazing types of violence.
2. At CATS Canterbury Peer on peer abuse will never be tolerated- it will not be classed as 'banter' or 'part of growing up – It will be reported and action taken under advisement from the AEO.
3. Peer on peer abuse is of a gendered nature (i.e. it is more likely that girls will be victims and boys perpetrators), but all peer on peer abuse is unacceptable and will be taken seriously.
4. If a disclosure of abuse is made by a student against another student, then the DSL must be informed. The DSL will liaise with the Principal and obtain advice from the Safeguarding Education Team - or liaise directly with Social Services to determine the next steps.

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<sup>3</sup> 'Guidance on Safer Working Practices is available on the DfE website.'

5. The allegation must be recorded in writing and the report passed to the DSL. The young person making the allegation must be treated with care and respect and their welfare safeguarded during the process.
6. Consideration will always need to be given to the welfare of both the victim(s) and perpetrator(s) in these situations. Both will be supported as individuals with the specific arrangements depending on the circumstances of the case. Confidentiality from the wider College community will be maintained where possible.
7. Reports of sexual abuse of children by children are likely to be complex and require difficult professional decisions to be made, often quickly and under pressure. Ultimately, any decisions will need to be made on a case-by-case basis, with the DSL (or deputy) taking a leading role and using their professional judgement, supported by other agencies, such as children's social care and the police as required.
8. Detailed advice is available in 'Sexual violence and sexual harassment between children in schools and colleges' (DfE May 2018), [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/719902/Sexual\\_violence\\_and\\_sexual\\_harassment\\_between\\_children\\_in\\_schools\\_and\\_colleges.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/719902/Sexual_violence_and_sexual_harassment_between_children_in_schools_and_colleges.pdf).

Note \* A bullying incident will be treated as a child protection concern where there is 'reasonable cause to suspect that a child is suffering, or likely to suffer, significant harm' and this policy will take regard of the College's Anti-Bullying policy.

### 13. Racist Incidents

1. Our policy on racist incidents is set out separately, and acknowledges that repeated racist incidents or a single serious incident may lead to consideration under child protection procedures. We keep a record of racist incidents. This record is kept by the Welfare Team and is confidential.

### 14. Prevention

1. We recognise that the college plays a significant part in the prevention of harm to our children by providing children with good lines of communication with trusted adults, supportive friends and an ethos of protection.
2. The college community will therefore:
  - Work to establish and maintain an ethos where students feel secure, are encouraged to talk and are always listened to. This includes regular consultation with children, e.g. through PSHEe participation.
  - Encourage students to report if they are unhappy either to staff directly or through the Tell Us buttons.
  - Ensure students know there is an adult in the college whom they can approach if they are worried or in difficulty.
  - Include safeguarding across the curriculum, including PSHEe opportunities, which equip students with the skills they need to stay safe from harm and to know who they should turn to for help. In particular this will include anti-bullying and e-safety.

- Ensure all staff are aware of college guidance for their use of mobile technology and have discussed safeguarding issues around the use of mobile technologies and their associated risks.

## 15. Health & Safety

1. Our Health & Safety Policy, set out in a separate document, reflects the consideration we give to the protection of our children both physically within the college environment, for example, in relation to internet use, and when away from the college such as undertaking college trips and visits.
2. Visitors on Site: Visitors to the college should be accompanied and sign in at Reception. In Canterbury, a yellow lanyard will be given to the visitors and this indicates that they are not DBS checked and must not be left alone with students. A visitor's policy is in place and must be adhered to at all times.
3. Access to Boarders' Accommodation: Visits to boarder's accommodation need to be pre-arranged with the House Parents and visitors must sign in upon arrival. Visitors must be accompanied by staff at all times whilst in the accommodation. Staff must pre-arrange a time to visit the boarding house and sign in upon arrival.

## 16. E-Safety and use of media

1. We recognise that the online environment and mobile technology presents positive opportunities, but also significant risks. As such emerging technologies will be examined for educational benefit.
2. We recognise that abuse can take place wholly online, or technology may be used to facilitate offline abuse.
3. The DSL and leadership team have read annex C regarding Online Safety within 'Keeping Children Safe in Education' 2018.
4. To mitigate risks the following arrangements are in place with respect to staff and students:
  - The College has WiFi within the teaching spaces and the Boarding Houses has a security filtering system installed;
  - The College will take all reasonable precautions to ensure that users access only appropriate material. However, due to the global and connected nature of Internet content, it is not possible to guarantee that access to unsuitable material will never occur via a College access or if via 3G, 4G or 5G services;
  - The use of computer systems without permission or for inappropriate purposes could constitute a criminal offence under the Computer Misuse Act 1990.
5. With respect to staff:
  - Staff will be issued with a College phone where contact with students is required. It is not permitted for staff to use their personal mobile phone, email or any online social media accounts to communicate with students.
  - Additional advice for staff is included in the Staff Code of Conduct (Appendix 5).
6. With respect to students:

- Mobile phones should only be used as part of a lesson during lesson time. The sending of abusive or inappropriate text, picture or video messages is forbidden.
- WiFi access in the Boarding Houses enables students to contact home via the internet on a regular basis, but is not available overnight in the Boarding Houses to allow students ample time for rest and to aid them in their sleep time management.
- The College recognises that as a multi-cultural community we must be sensitive to Internet related issues experienced by students outside the College environment e.g. on social networking sites. We provide education in e-safety and offer appropriate welfare support and advice.

## Cyberbullying

1. It is essential that students, College staff, parents and carers understand how cyberbullying is different from other forms of bullying, how it can affect people and how to respond and combat misuse. Promoting a culture of confident users will support innovation and safety.
2. Cyberbullying (along with all forms of bullying) will not be tolerated in College. Full details are set out in the College's Anti-bullying Policy. There is welfare support available to any students who have been affected by Cyberbullying.

## Media imagery

1. There is evidence that some people use the leisure environment as an opportunity to take inappropriate photographs or film footage of young people in vulnerable positions. CATS Canterbury's Guidelines should be implemented at all times when photographic or any other filming equipment is being used.
2. In recognition of this fact CATS Canterbury asks all staff members to be alert to any suspicious activity, particularly where students may be involved, and encourages them to report any such incidents at the earliest opportunity.
3. The college only uses images of subjects in suitable dress or, where the dress is situational, appropriate to reduce the risk of inappropriate use. There are some sports activities – swimming, gymnastics and athletics for example where the risk of potential misuse is much greater. With these sports the content of the photograph should usually focus on the activity and not focus solely on a particular subject.

## 17. Substance Misuse, Mental Health, Self-Harm and Safeguarding

1. The discovery that a young person is misusing substances, legal or illegal, or reported evidence of their substance misuse will be investigated to assess the level of ongoing support required and intervention services available for the young person to access where there is evidence or reasonable cause:
  - To believe the young person's substance misuse may cause him or her to be vulnerable to other abuse such as sexual abuse.
  - To believe the young person's substance misuse related behaviour is a result of abusing or endangering pressure or incentives from others, particularly adults.
  - Where the misuse is suspected of being prompted by serious parent/carer drug misuse.
2. Children of Substance Abusing Parents

Further enquiries and/or further action will be taken when the college receives reliable information about drug and alcohol abuse by a child's parents/carers in the following circumstances:

- The parental misuse is regarded as problematic (i.e. multiple drug use including injection).
- A chaotic and unpredictable home environment exists which can be attributed to drug or alcohol misuse.
- The young person is not being provided with acceptable or consistent levels of social and health care.
- The young person is being exposed to criminal behaviour.

Please refer to the colleges Misuse of Non-Prescribed Drugs Policy.

### 3. Mental Health/Self Harm /Eating Disorders

The discovery that a young person has mental health/self-harm or eating disorders in itself may initiate further assessment to initiate Safeguarding proceedings, but where the child is at risk of harm to themselves or others then a referral will be made to Social Services after advice from the Area Education Advisor.

The college will consider the below actions:

- Refer the student to seek appropriate professional help.
- Support the student through the referral process.
- Liaise with professionals to ensure we provide wrap-around child care.
- Liaise with parents with the agreement of the child, where appropriate.

Please see the Medical Care Policy for Self-harm and eating disorders and the SEND policy for Mental Health Support and guidance.

## 18. Responding to Suspicions & Allegations of Abuse

1. Any concerns for the welfare of a student arising from abuse or harassment by a member of staff (including Volunteers) must be reported immediately to the Principal, or in his/her absence, the CATS Canterbury Safeguarding Governor, Stuart White.
2. Allegations made against the Principal should be referred to the CATS Canterbury Chair of Governors, Stuart White.
3. CATS Canterbury assures all staff that it will fully support and protect anyone who, in good faith (without malicious intent), reports his or her concerns about a colleague's practice or the possibility that a student may be being abused.
4. False allegations of abuse do occur. However, if a student says or indicates that he/she is being abused, or information is obtained which gives concern that a student is being abused, this should never be ignored.

Any member of staff can report a concern direct to Social Services. There is a flow diagram in Appendix 2 for what to do if you suspect or need to respond to a student child protection allegation/concern.

5. Any child at risk of harm needs an immediate referral to Social Services. Any child in need who is not at immediate risk of harm may need an alternative intervention such as a KFSF (Kent Family Support Framework) or TAC (Team around the Child) approach – this will be implemented by the DSL with guidance from Social Services. All allegations must be reported to the DOLA OR TEAM OF OFFICERS Officer immediately or within one working day.
6. A member of staff receiving information concerning disclosure should:
  - React calmly so as not to frighten the student.
  - Reassure the student that he/she was right to tell.
  - Not make promises of confidentiality, but let them know you will have to tell another adult.
  - Take what the student says seriously, recognising the difficulties inherent in interpreting what is said by a student.
  - Keep questions to an absolute minimum to ensure a clear and accurate understanding of what has been said. Questions should not be leading. Questions should only consist of Who...? What...? When...? Where...? It should be information gathering and fact finding; under no circumstances should you investigate the incident. It should include:
    - a. The nature of the allegation.
    - b. A description of any visible bruising or other injuries using the body map on reverse of log sheet.
    - c. The student's account, if it can be given, of what has happened and how any bruising or other injuries occurred.
    - d. Witnesses to the incident(s).
    - e. Any times, dates or other relevant information.
    - f. A clear distinction between what is fact, opinion or hearsay.

Make a full written record of what has been said, heard and/or seen as soon as possible using the appendix 3 –logging a concern sheet and updating on Shackleton using the safeguarding box and writing in the pink section only.

## 6. Actions to be avoided

The person receiving the disclosure should not:

- Panic.
- Allow their shock or distaste to show.
- Probe for more information than is offered.
- Speculate or make assumptions.
- Make negative comments about the alleged abuser.
- Approach the alleged abuser.
- Make promises to agree to keep secrets.
- Discuss the issue with anyone other than their DSL or Senior Management.

Staff are not responsible for deciding whether or not student abuse is taking place. However, there is a responsibility and a duty to act on any concerns and to protect students in order that appropriate agencies can then make enquiries and take the necessary action to protect the student (see Appendix 2 for flow diagram, and recording and reporting procedures).

Any allegations against a member of staff (including volunteers) must be referred to the DOLA OR TEAM OF OFFICERS within one working day. This referral will be made by the

Principal. If a crime may have been committed then this will be reported to the Police by the Principal in liaison with the DSL.

7. Residential Staff and Allegations:

If a residential member of staff is suspended pending an investigation regarding a safeguarding allegation then the college will accommodate the member of staff elsewhere in the college ensuring that there is no access to students.

## 19. Children in Care

The Principal carries responsibility for children in care and will monitor educational outcomes and pastoral issues in conjunction with the Additional Learning Support Coordinator.

## 20. Responding to Extremism and Terrorism

1. CATS Canterbury recognises that it has a duty to protect students from being drawn into terrorism. Being drawn into terrorism includes not just violent extremism but also non-violent extremism, which can create an atmosphere conducive to terrorism and can popularise views which terrorist can exploit. Cats Canterbury strives to be a space in which young people can understand and discuss sensitive topics, including terrorism and the extremist ideas that are part of terrorist ideology and learn how to challenge these ideas.
  - CATS Canterbury will ensure its PSHEE programme teaches students the broad knowledge of public institutions and services in England and encourages students to respect fundamental British values of democracy, the rule of law, individual liberty, mutual respect and tolerance of those with different faiths and beliefs.
  - CATS Canterbury will ensure staff know how to report extremist concerns with regards to a student/staff at the College. (see appendix 7)
  - The college will ensure that an up to date risk assessment is in place and this is reviewed alongside the safeguarding policy.
  - The college will ensure that the DSL will liaise with the CONTACT point designated person within the police force to report any concerns and gain insight into the assessed risk of the local area

## 21. Missing Children from Education

1. CATS Canterbury recognises that all children, regardless of their circumstances, are entitled to a full time education which is suitable to their age, ability, aptitude and any special educational needs they may have. Children missing education (CME) are at significant risk of underachieving, being victims of abuse, and becoming NEET (not in education, employment or training) later on in life.
2. CATS Canterbury will monitor students' attendance daily and act upon missing students using the Missing Student Policy if necessary and the Attendance Policy.
3. Unexplained absences will be investigated and addressed appropriately, including reporting to the Local authority as per KCSIE Guidance September 2018.

## 22. Sexting in College – Youth Produced Sexual Imagery

1. Making, possessing and distributing any imagery of someone under 18 which is 'Indecent' is illegal. This includes sexual imagery a young person under the age of 18 has produced themselves.
2. The school will respond to cases of "sexting" (or Youth Produced Sexual Imagery) in line with the UKCCIS "Sexting in Schools and Colleges" guidance and KSCB guidance, 2016, <https://www.safeguardingschools.co.uk/wp-content/uploads/2016/08/Sexting-in-schools-and-colleges-UKCCIS-August-2016.pdf>.
3. All incidents involving youth produced sexual imagery will be reported to the Designated Safeguarding Lead.
4. The Designated Safeguarding Lead will follow the procedural protocol as stated in the online (e- safety) Policy.
5. Under no circumstances are staff to copy or download ANY indecent imagery shown to them by another person (staff or student) onto their own electronic device or the internet. Confiscation of an electronic device is allowed and the device should be handed to the DSL.

## 23. Monitoring and Review Procedures

1. All school staff (including temporary staff and volunteers) will have access to a copy of this policy. The policy will also be available to parents/carers.
2. This policy is formally presented to the Governors each October for review, alongside the Principal's report on Safeguarding. The Designated Governor queries the college's policy and practice and, when satisfied, signals approval by signing off the policy and report. Any recommendations for change in the light of the previous years' experience or statutory changes to safeguarding are incorporated into the updated policy.
3. Governors regularly visit the college to check compliance and that all safeguarding processes are in fully in place and operating correctly.

## Appendix One - Types of abuse and neglect

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

**Physical abuse:** a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

**Emotional abuse:** the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

**Sexual abuse:** involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

**Neglect:** the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

## Risk Indicators

The factors described in this section are frequently found in cases of child abuse. Their presence is not proof that abuse has occurred, but:

- Must be regarded as indicators of the possibility of significant harm.
- Justifies the need for careful assessment and discussion with designated / named / lead person, manager, (or in the absence of all those individuals, an experienced colleague).
- May require consultation with and / or referral to Children's Services.

The absence of such indicators does not mean that abuse or neglect has not occurred.

In an abusive relationship the child may:

- Appear frightened of the parent/s.
- Act in a way that is inappropriate to her/his age and development (though full account needs to be taken of different patterns of development and different ethnic groups).

The parent or carer may:

- Persistently avoid child health promotion services and treatment of the child's episodic illnesses.
- Have unrealistic expectations of the child.
- Frequently complain about/to the child and may fail to provide attention or praise (high criticism/low warmth environment).
- Be absent or misusing substances.
- Persistently refuse to allow access on home visits.
- Be involved in domestic abuse.

Staff should be aware of the potential risk to children when individuals, previously known or suspected to have abused children, move into the household.

## Assessment

In order to more fully determine the nature of the incident the following factors should be given consideration. The presence of exploitation in terms of:

**Equality** – consider differentials of physical, cognitive and emotional development, power and control and authority, passive and assertive tendencies.

**Consent** – agreement including all the following:

- Understanding what is proposed based on age, maturity, development level, functioning and experience.
- Knowledge of society's standards for what is being proposed.
- Awareness of potential consequences and alternatives.
- Assumption that agreements or disagreements will be respected equally.
- Voluntary decision.
- Mental competence.

**Coercion** – the young perpetrator who abuses may use techniques like bribing, manipulation and emotional threats of secondary gains and losses that is loss of love, friendship, etc. Some may use physical force, brutality or the threat of these regardless of victim resistance.

In evaluating sexual behaviour of children and young people, the above information should be used only as a guide.

## Child Sexual Exploitation

*Child Sexual Exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child Sexual Exploitation does not always involve physical contact; it can also occur through the use of technology.*

The following list of indicators is not exhaustive or definitive but it does highlight common signs which can assist professionals in identifying children or young people who may be victims of sexual exploitation. Signs include:

- Underage sexual activity.
- Inappropriate sexual or sexualised behaviour.
- Sexually risky behaviour, 'swapping' sex.
- Repeat sexually transmitted infections.
- In girls, repeat pregnancy, abortions, miscarriage.
- Receiving unexplained gifts or gifts from unknown sources.
- Having multiple mobile phones and worrying about losing contact via mobile.
- Having unaffordable new things (clothes, mobile) or expensive habits (alcohol, drugs).
- Changes in the way they dress.
- Going to hotels or other unusual locations to meet friends.
- Seen at known places of concern.
- Moving around the country, appearing in new towns or cities, not knowing where they are
- Getting in/out of different cars driven by unknown adults.
- Having older boyfriends or girlfriends.
- Contact with known perpetrators.
- Involved in abusive relationships, intimidated and fearful of certain people or situations.
- Hanging out with groups of older people, or anti-social groups, or with other vulnerable peers.
- Associating with other young people involved in sexual exploitation.
- Recruiting other young people to exploitative situations.
- Truancy, exclusion, disengagement with school, opting out of education altogether.
- Unexplained changes in behaviour or personality (chaotic, aggressive, sexual).
- Mood swings, volatile behaviour, emotional distress.
- Self-harming, suicidal thoughts, suicide attempts, overdosing, eating disorders.
- Drug or alcohol misuse.
- Getting involved in crime.
- Police involvement, police records.
- Involved in gangs, gang fights, gang membership.
- Injuries from physical assault, physical restraint, sexual assault.
- Breast ironing

## Forced Marriage (FM)

This is an entirely separate issue from arranged marriage. It is a human rights abuse and falls within the Crown Prosecution Service definition of domestic violence. Young men and women can be at risk in affected ethnic groups. Whistle-blowing may come from younger siblings. Other indicators may be detected by changes in adolescent behaviours. Never attempt to intervene directly as a school or through a third party.

## Domestic Violence

As defined by HM Government: any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality.

The abuse can encompass, but is not limited to:

- psychological
- physical
- sexual
- financial
- emotional

## Female Genital Mutilation (FGM)

It is essential that staff are aware of FGM practices and the need to look for signs, symptoms and other indicators of FGM. Suspicion of FGM or a child being at risk of FGM, must be reported to the police.

What is FGM? - It involves procedures that intentionally alter/injure the female genital organs for non-medical reasons.

### 4 types of procedure:

- Type 1 Clitoridectomy – partial/total removal of clitoris.
- Type 2 Excision – partial/total removal of clitoris and labia minora.
- Type 3 Infibulation entrance to vagina is narrowed by repositioning the inner/outer labia.
- Type 4 All other procedures that may include: pricking, piercing, incising, cauterising and scraping the genital area.

### Why is it carried out?

Belief that:

- FGM brings status/respect to the girl – social acceptance for marriage.
- Preserves a girl's virginity.
- Part of being a woman / rite of passage.
- Upholds family honour.
- Cleanses and purifies the girl.
- Gives a sense of belonging to the community.
- Fulfils a religious requirement.
- Perpetuates a custom/tradition.
- Helps girls be clean / hygienic.
- Is cosmetically desirable.
- Mistakenly believed to make childbirth easier.

### Is FGM legal?

FGM is internationally recognised as a violation of human rights of girls and women. It is illegal in most countries including the UK.

Circumstances and occurrences that may point to FGM happening:

- Child talking about getting ready for a special ceremony.
- Family taking a long trip abroad.
- Child's family being from one of the 'at risk' communities for FGM (Kenya, Somalia, Sudan, Sierra Leone, Egypt, Nigeria, Eritrea as well as non-African communities including Yemeni, Afghani, Kurdistan, Indonesia and Pakistan).
- Knowledge that the child's sibling has undergone FGM.
- Child talks about going abroad to be 'cut' or to prepare for marriage.

**Signs that may indicate a child has undergone FGM:**

- Prolonged absence from school and other activities.
- Behaviour change on return from a holiday abroad, such as being withdrawn and appearing subdued.
- Bladder or menstrual problems.
- Finding it difficult to sit still and looking uncomfortable.
- Complaining about pain between the legs.
- Mentioning something somebody did to them that they are not allowed to talk about.
- Secretive behaviour, including isolating themselves from the group.
- Reluctance to take part in physical activity.
- Repeated urinal tract infection.
- Disclosure.

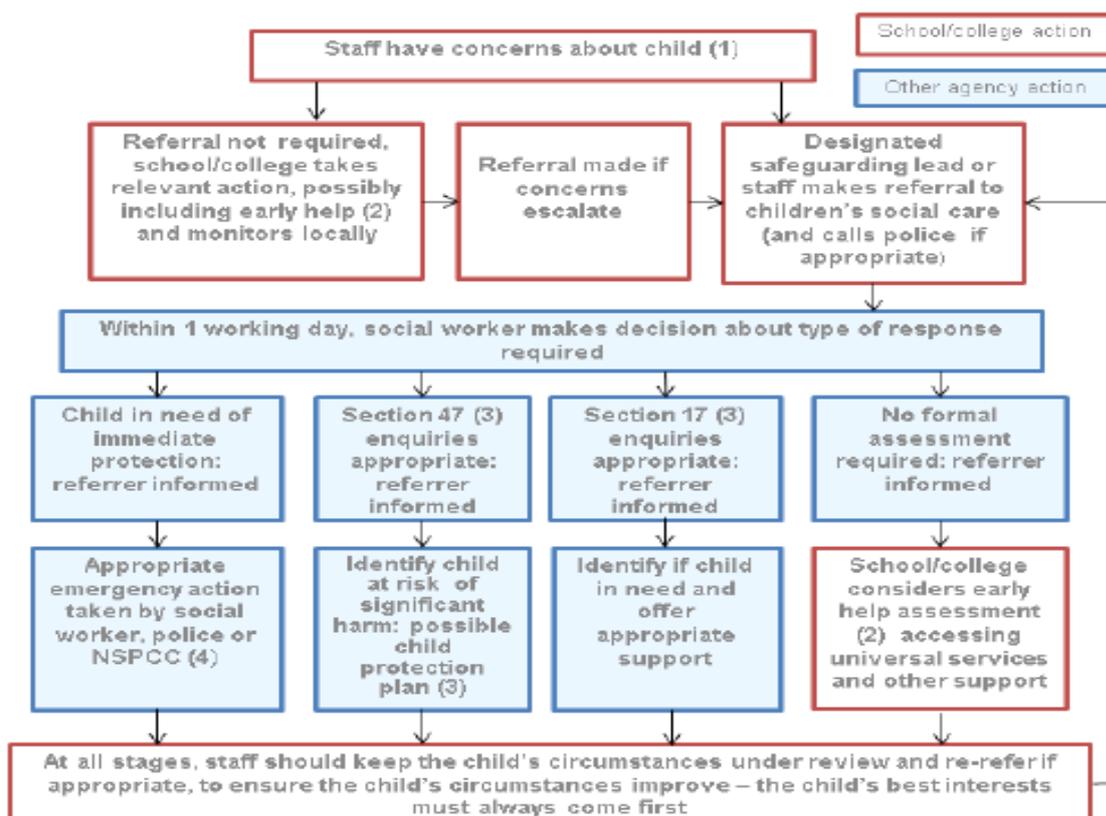
**The 'One Chance' rule**

As with Forced Marriage there is the 'One Chance' rule. It is essential that settings /schools/colleges take action without delay.

## Appendix Two - Action where there are concerns about a child

This diagram illustrates what action should be taken and who should take it when there are concerns about a child. If, at any point, there is a risk of immediate serious harm to a child a referral should be made to children's social care immediately. ANYONE CAN MAKE A REFERRAL

### Actions where there are concerns about a child



1. In cases which also involve an allegation of abuse against a staff member, see Part four of this guidance.
2. Early help means providing support as soon as a problem emerges at any point in a child's life. Where a child would benefit from co-ordinated early help, an early help inter-agency assessment should be arranged. Chapter one of [Working together to safeguard children](#) provides detailed guidance on the early help process.
3. Under the Children Act 1989, local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare. This can include s17 assessments of children in need and s47 assessments of children at risk of significant harm. Full details are in Chapter one of [Working together to safeguard children](#).
4. This could include applying for an Emergency Protection Order (EPO).

## Appendix Three - Logging a Concern about a Child's Safety and Welfare

|   |           |                          |
|---|-----------|--------------------------|
| Name and Address of School/Establishment or Agency  |           |                          |
| Child's Full Name   |           |                          |
| DOB   | Ethnicity | Gender                   |
| Today's Date – D/M/Y  |           | Time                     |
| Your Name (print)   |           | Your Signature           |
| Your Role   |           |                          |
| Date of Concern/Incident  |           | Time of Concern/Incident |
| Describe the incident as factually as possible. Include who was involved, where it happened, exactly what happened etc. Remember to describe clearly any behavioural or physical signs you have observed. |           |                          |

(Check to make sure your report is clear now - and will also be clear to anyone reading it in the future.)

Action taken .....

Received by ..... Designated Person for Child Protection

Date ..... Time .....

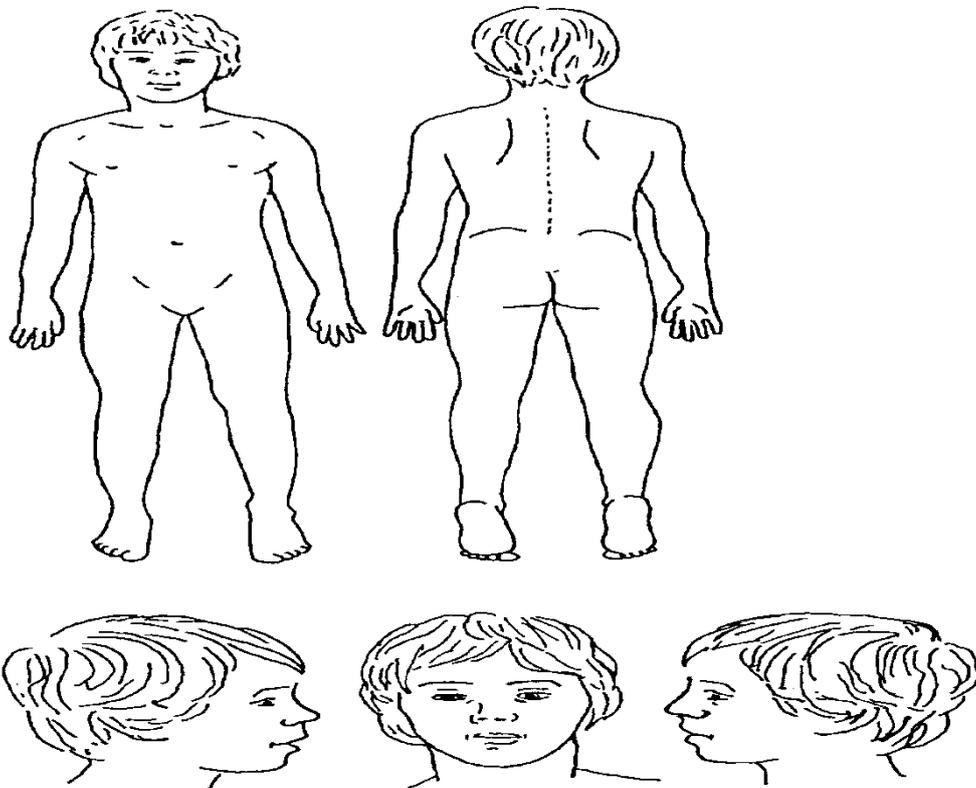
Action by the Designated Person .....

.....

.....

(continue on a separate sheet if necessary)

**BODY MAP**



Note\*: If using this chart please only indicate what is visible- at no point would the College consider it necessary to ask a student to remove non out clothing.



## Appendix Five - Code of Conduct/Behaviour: Good Practice Guidelines

All staff will be encouraged to demonstrate exemplary behaviour in order to protect themselves from false allegations and to avoid putting themselves at risk. The following are common sense guidelines of how this can be achieved (the list is not exhaustive):

- a. Never make sexually suggestive comments to students in jest or fun, or engage in rough, physical or sexually provocative games, including horseplay.
- b. Never ask for personal information without providing an explanation of the reason for asking it and how the information is going to be used and stored.
- c. Do not guarantee confidentiality and/or privacy.
- d. Never do things of a personal nature for a student that they can do for themselves.
- e. If a student approaches you inappropriately, discourage them and ensure you implement safe working practices such as never being alone with them, and informing your line manager immediately or as soon as possible. In addition, make a written record of what has happened, including dates and times, what you said to your student, who you spoke with after the event and what advice you were given.
- f. If you find yourself in the position of teaching one on one, always notify your line manager or another member of staff of the situation. If you have to move location then this also needs to be made known. Always leave the classroom door open and always ask the student to sit nearest the door. Where this is not possible, never obstruct the exit pathway of the student by placing yourself between the exit and the student.
- g. If you have to speak to a student on a personal matter it is always best practice to have another member of staff present. Where this is not possible, notify your immediate line manager prior to speaking to the student and where this is not feasible, as soon as you possibly can, remembering to record notes about the interaction.
- h. It is not appropriate for staff to socialise with students without the college being aware, and it is not appropriate for staff to use chat rooms or other online forums not set up by the college to communicate with students (i.e. Facebook and Twitter). Staff should always communicate within clearly defined boundaries. Staff should ensure that:
  - Personal social networking sites are set to private and never listed as approved contacts.
  - Staff never use or access social networking sites of students.
  - Staff do not give their personal contact details to students, including their mobile telephone number.
  - Staff only use equipment e.g. mobile phones, provided by the College to communicate with children, making sure that parents have given permission for this form of communication to be used.
  - Staff only make contact with students for professional reasons and in accordance with any college policy.
  - Staff recognise that text messaging should only be used a part of an agreed protocol and when other forms of communication are not possible.
  - Staff do not use internet or web-based communication channels to send personal messages to a young person.

- Staff need to be fully aware of guidance on Prevent and Female Genital Mutilation and must have completed the online safeguarding course which covers these areas as well as whole staff training on safeguarding.
  - Staff should be aware of the CEG Whistleblowing policy and be secure in their knowledge they are always welcome to raise issues of concern without fear of consequences.
  - Staff may not register or post on the CATS Facebook page without the express permission of the Principal. A new account must be created without any personal details or friends on and students may not access any personal information about you. Your college email should be used to sign up and not a personal one.
- i. Staff should under no circumstance take a student into their car unless they have a Business insurance and have provided the DSL with a copy of their insurance and driving license.
  - j. Staff should not accept, offer or promise expensive gifts from students. As per the CEG anti-bribery policy, all members of staff are required to read the anti-bribery policy and declare any gifts that may be given to them. Please refer to the CEG policy on the G drive.
  - k. Staff are asked to declare a physical or mental impairment which has a substantial and long term adverse effect on their ability to carry out normal day-to-day activities. Should circumstances change, staff must disclose any changes that may result in not being able to carry out the duties for which they are employed.
  - l. As the University Foundation Programme has a shelf life of two years and students can re-sit IB modules up to two years after a student has left the college, it is not considered appropriate for staff to have contact with former students during this period. Staff may however contact students or former students at any time using their CATS Canterbury email.
  - m. In terms of physical contact with students, always consider whether behaviour is situationally appropriate - a hug initiated by the student at graduation in the presence of others would be viewed differently to a hug initiated by you alone in a classroom. Consider that with allegations, a history of initiating contact is seen as a contributing factor.

**NB:** The above guidance should not be considered exhaustive and more detailed guidance may be required for specific posts/activities. If staff have any concerns regarding the appropriateness of any practice/action they should contact their line manager/senior manager/Designated Safeguarding Lead (DSL).

## Appendix Six - Internal Inquiries and Suspension – College Procedure

All allegations of abuse will be taken seriously unless otherwise stated. In all instances where a student makes an allegation against a member of staff it will be reported to the Principal. The DSL will be available to advise the Principal. Allegations will be referred immediately to DOLA OR TEAM OF OFFICERS for allegations against staff and Social Services for allegation of abuse of a student within one working day of the allegation.

The DOLA OR TEAM OF OFFICERS will direct any investigation and give advice and support to the DSL and College on all investigations as deemed necessary.

Allegations made against the DSL or Deputy DSL should be referred to the Principal of the College in the first instance.

Allegations made against the Principal should be referred to the CATS Canterbury's Chair of Governors, Stuart White at Kett House, who will investigate alongside a Designated Safeguarding Lead. The Principal is not to be made aware of the referral to the Chair of Governors – It will be up to the Chair of Governors, with advice from DOLA, of when to inform the Principal.

CATS Canterbury is duty bound to take all complaints seriously, it promotes that:

*Since any future proceeding investigation may have profound implication upon the physical, social, mental, psychological and practical aspects of an individual career and life, the responsibility and onus for safeguarding against any Safeguarding accusation, allegation or complaint is solely placed on the shoulders of the staff member.*

This is because, depending upon the nature of the allegation, the accused may be removed, and/or suspended from their post or position until a full investigation has taken place.

Where there is a complaint of abuse against a member of staff or volunteer, there may be two broad types of investigation: Internal and/or External.

In all allegations internal procedures will be triggered in line with advice from the DOLA OF OFFICERS Officer. These consist of, (but are by no means exhaustive):

- Immediate risk assessment to determine the needs of the student and the DSL will take such steps as they feel appropriate to ensure the safety of the student in question and any other student who may be at risk.
- DSL to converse with CSS/DOLA OR TEAM OF OFFICERS team and Principal.
- If agreed with DOLA OR TEAM OF OFFICERS Officer the DSL to form and chair a Safeguarding team to oversee the internal investigation. In most instances this team will comprise the DSL, Deputy DSL, the Vice- Principal, and other members of staff that may have a direct connection with the alleged incident.
- A report compiled and meeting held between DSL and Vice-Principal to determine way forward.

If, following consideration and weighing up the probabilities, there is no case to be answered then all events are accurately recorded and filed in Safeguarding register held in DSL. The DSL is ultimately responsible for this procedure.

If, following consideration and investigation, the allegation is clearly about poor practice, the Principal along with the DSL or/and the Vice Principal will deal with it as a misconduct issue and will follow CATS Canterbury disciplinary procedure.

If, following consideration and investigation, the allegation is clearly about certain misunderstandings, then the Principal along with the DSL or/and the Vice Principal, will offer as part of a support package, advice, guidance, opportunities to students parents and members of staff.

If it is felt, weighing up the probabilities, that there is a case to be heard then in all instances the Designated Safeguarding Lead will contact social services for consultation.

There are several outcomes for any Safeguarding investigation and depending upon the nature and circumstances of the allegation will dictate which outcomes are forthcoming.

**Suspension of Staff/Volunteers:** In line with statutory guidance, CATS Canterbury will seek alternatives before suspending. The Guidance contains suggestions, such as redeployment of staff, moving the student(s) to other classes (making it clear that this is not a punishment), or providing an assistant to be present when the member of staff has contact with students. If immediate suspension is considered necessary, the rationale should be agreed with the DOLA OR TEAM OF OFFICERS and recorded. This should include what alternatives were considered and why they were rejected.

The individual may face, (not mutually exclusive), Internal Disciplinary Procedures, Criminal Proceedings and/or civil proceedings, instigated by the person/family of the person who alleged the abuse. The results of the Police and CLA Social Services investigation may influence the CATS disciplinary investigation, but not necessarily. It is important to realize that irrespective of the findings of CLA Social Services or of police inquiries, CATS Canterbury will treat all individual cases under disciplinary procedures.

The college is duty bound to report to the DBS any dismissal of any person (whether employed, contracted, volunteer or student) with regard to allegations of abuse against a young person within the set criteria laid out by the DBS and will do so promptly. CATS Canterbury is also under a duty to consider making a referral to the Teaching Regulation Agency where a teacher has been dismissed (or would have been dismissed had he/she not resigned) and where a prohibition order may be appropriate. The reasons for such an order would be considered are: “unacceptable professional conduct”, “conduct that may bring the profession into disrepute” or a “conviction, at any time, for a relevant offence”. Further guidance is published on the TRA website. Where a referral has been made to the DBS, it is not necessary for a referral also to be made to TRA, as information is shared between the two bodies. Where a dismissal does not reach the threshold for DBS referral, separate consideration must be given to a TRA referral.

## Appendix Seven - Extremism and Terrorism Procedural Guidelines:

Definitions: (KCSIE, 2018, p.82-83)

- **Radicalisation:** refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.
- **Extremism:** is the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces.
- **Prevent:** The duty placed on specified authorities (such as schools) to have “*due regard to the need to prevent people from being drawn into terrorism*”.

This section provides ways in which a person can be vulnerable to radicalisation and the indicators that might suggest vulnerabilities- however, it should not be assumed that the characteristics or experiences set out below necessarily indicate a person is either committed to terrorism or may become a terrorist.

- Engagement with a group, cause or ideology
- Changing style of dress or appearance in accordance with ideology group
- Day to day behaviour/thoughts/ideas become centred around ideology group or cause
- Loss of interest or friends/activities not associated with ideology group or cause
- Possession of material or symbols associated with an extremist cause
- Attempts to recruit others to the group/cause/ideology
- Communications with others to suggest identification with group/cause/ideology

At the College if you are concerned about a young person’s ideology or staff ideology then please in the first instance report your concerns to the Designated Safeguarding Lead (DSL). The DSL will liaise with the Senior Management Team and if necessary liaise directly with the ‘CHANNEL CONTACT LEAD’.

Channel is a government led initiative to protect vulnerable people from being drawn into terrorism. Channel’s aim is to support and protect vulnerable people from becoming extremists by placing a good support network around the person that challenges the ideology that supports terrorism, protects the individual person and provides adequate and relevant support.

## Appendix Eight - Other Resources

Keeping Children Safe in Education: [www.gov.uk/government/publications/keeping-children-safe-in-education--2](http://www.gov.uk/government/publications/keeping-children-safe-in-education--2)

Working Together to Safeguard Children 2018 [www.gov.uk/government/publications/working-together-to-safeguard-children--2](http://www.gov.uk/government/publications/working-together-to-safeguard-children--2)

Bullying including Cyberbullying: <http://www.gov.uk/government/publications/preventing-and-tackling-bullying>

Sexual violence and sexual harassment between children in schools and colleges: [www.gov.uk/government/publications/sexual-violence-and-sexual-harassment-between-children-in-schools-and-colleges](http://www.gov.uk/government/publications/sexual-violence-and-sexual-harassment-between-children-in-schools-and-colleges)

### Support for staff

- Education Support Partnership: <http://www.educationsupportpartnership.org.uk>
- Professional Online Safety Helpline: <http://www.saferinternet.org.uk/helpline>

### Support for children

- NSPCC: <http://www.nspcc.org.uk>
- ChildLine: <http://www.childline.org.uk>
- Papyrus: <http://www.papyrus-uk.org>
- Young Minds: <http://www.youngminds.org.uk>
- The Mix: <http://www.themix.org.uk>

### Support for adults

- Family Lives: <http://www.familylives.org.uk>
- Crime Stoppers: <http://www.crimestoppers-uk.org>
- Victim Support: <http://www.victimsupport.org.uk>
- Kidscape: <http://www.kidscape.org.uk>
- The Samaritans: <http://www.samaritans.org>
- Mind: <http://www.mind.org.uk>
- NAPAC (National Association for People Abused in Childhood): <http://www.napac.org.uk>
- MOSAC: <http://www.mosac.org.uk>

Drugs: [www.gov.uk/government/publications/drugs-advice-for-schools](http://www.gov.uk/government/publications/drugs-advice-for-schools)

### Support for Learning Disabilities

- Respond: <http://www.respond.org.uk>
- Mencap: <http://www.mencap.org.uk>

### Honour based Violence

- Forced Marriage Unit: <http://www.gov.uk/guidance/forced-marriage>

### Sexual Abuse and CSE

- Lucy Faithfull Foundation: <http://www.lucyfaithfull.org.uk>

- Stop it Now!: <http://www.stopitnow.org.uk>
- Parents Protect: <http://www.parentsprotect.co.uk>
- CEOP: <http://www.ceop.police.uk>
- Marie Collins Foundation: <http://www.mariecollinsfoundation.org.uk>
- Internet Watch Foundation (IWF): <http://www.iwf.org.uk>

### Online Safety

- Childnet International: <http://www.childnet.com>
- UK Safer Internet Centre: <http://www.saferinternet.org.uk>
- Parents Info: <http://www.parentinfo.org>
- Internet Matters: <http://www.internetmatters.org>
- Net Aware: <http://www.net-aware.org.uk>
- ParentPort: <http://www.parentport.org.uk>
- Get safe Online: <http://www.getsafeonline.org>

### Radicalisation and hate

- Educate against Hate: <http://www.educateagainsthate.com>
- Counter Terrorism Internet Referral Unit: <http://www.gov.uk/report-terrorism>
- True Vision: <http://www.report-it.org.uk>

**Trafficking:** <http://www.gov.uk/government/publications/safeguarding-children-who-may-have-been-trafficked-practice-guidance>

## Appendix Nine - Additional Polices

The following polices can be read alongside the Safeguarding and Child Protection Policy and are available on request by emailing the Registrar ([registrar@catscanterbury.com](mailto:registrar@catscanterbury.com)) or staff can find them on Shackleton.

- Attendance
- Anti-Bullying, including cyber-bullying
- Equality and Diversity
- Use of Reasonable Force
- Medical Care
- First Aid
- Misuse of Non-Prescribed Drugs
- Educational visits
- E-safety
- Visitors and Staff Guests
- Safer Recruitment
- Behaviour, Discipline and Exclusions
- Confidentiality
- Pastoral Principles, Welfare and Practice
- Missing Students Policy
- CEG Staff Code of Conduct

## Appendix Ten - DSL and DDSL Job Descriptions

### Designated Safeguarding lead

The Designated Safeguarding Lead (DSL) is a senior member of staff, from the College's leadership team. Together with the two Deputy DSL, they have a legal responsibility for dealing with safeguarding issues, providing advice and support to staff, liaising with the Local Authority, and working with a range of other agencies. The Designated Safeguarding Lead need not be a teacher but must have the status and authority within the management structure to carry out the duties of the post.

### Manage referrals

- refer cases of suspected abuse to the local authority children's social care as required;
- support staff who make referrals to local authority children's social care;
- refer cases to the Channel programme where there is a radicalisation concern as required;
- support staff who make referrals to the Channel programme;
- refer cases where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service as required; and
- refer cases where a crime may have been committed to the Police as required.

### Work with others

- liaise with the Principal to inform her of issues especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations;
- as required, liaise with the "case manager" and the designated officer(s) at the local authority for child protection concerns in cases which concern a staff member;
- liaise with staff (pastoral support staff, school matron, IT Technicians, and SENCO) on matters of safety and safeguarding, including online and digital safety, and when deciding whether to make a referral by liaising with relevant agencies; and
- act as a source of support, advice and expertise for all staff.

### Training

The designated safeguarding lead will undergo training to provide them with the knowledge and skills required to carry out the role. This training will be updated at least every two years.

The designated safeguarding lead will undertake Prevent awareness training.

In addition to the formal training set out above, their knowledge and skills will be refreshed (this might be via e-bulletins, meeting other designated safeguarding leads, or simply taking time to read and digest safeguarding developments) at regular intervals, as required, and at least annually, to allow them to understand and keep up with any developments relevant to their role so they:

- understand the assessment process for providing early help and statutory intervention, including local criteria for action and local authority children's social care referral arrangements.
- have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so;
- ensure each member of staff has access to, and understands, the College's child protection policy and procedures, especially new and part time staff;

- are alert to the specific needs of children in need, those with special educational needs and young carers;
- are able to keep detailed, accurate, secure written records of concerns and referrals;
- understand and support the College with regards to the requirements of the Prevent duty and are able to provide advice and support to staff on protecting children from the risk of radicalisation;
- are able to understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online at College;
- can recognise the additional risks that children with SEN and disabilities (SEND) face online, for example, from online bullying, grooming and radicalisation and are confident they have the capability to support SEND children to stay safe online;
- obtain access to resources and attend any relevant or refresher training courses; and
- encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the College may put in place to protect them.

### **Raise Awareness**

- ensure the College's child protection policies are known, understood and used appropriately;
- ensure the College's child protection policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with governing bodies or proprietors regarding this;
- ensure the child protection policy is available publicly and parents are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the College in this; and
- link with the local LSCB to make sure staff are aware of any training opportunities and the latest local policies on local safeguarding arrangements.

### **Child protection file**

Where children leave the College ensure their child protection file is transferred to the new College or School as soon as possible. This should be transferred separately from the main pupil file, ensuring secure transit, and confirmation of receipt should be obtained. Receiving schools and Colleges should ensure key staff such as designated safeguarding leads and SENCOs or the named person with oversight for SEN in Colleges, are aware as required.

In addition to the child protection file, the designated safeguarding lead should also consider if it would be appropriate to share any information with the new College in advance of a child leaving. For example, information that would allow the new College to continue supporting victims of abuse and have that support in place for when the child arrives.

### **Availability**

During term time the designated safeguarding lead (or a deputy) should always be available (during College hours) for staff in the College to discuss any safeguarding concerns. Whilst generally speaking the designated safeguarding lead (or deputy) would be expected to be available in person, in exceptional circumstances availability via phone and or Skype or other such media is acceptable.

### **Boarding**

- With other members of the College's Senior Leadership Team oversee the creation and maintenance of all welfare and boarding policies, risk assessments and other documents.
- Lead and manage the Boarding Manager and support their role in managing the House Parent Team to ensure the successful implementation of procedures in the boarding house, and proactively evaluate and improve standards of welfare support for students.
- Manage the College's Matrons to ensure the effective dissemination of information and the provision of effective and appropriate healthcare advice and support to students.
- With the Boarding Manager, lead on the appointment boarding staff and assist the Senior Leadership Team with interviewing applicants for more senior posts.
- Manage the training needs of the boarding staff from induction, CPD and INSET to diploma level as required.

### **Deputy Designated Safeguarding lead (DDSL) Job Description**

The Designated Safeguarding Lead (DSL) is a senior member of staff, from the College's leadership team. Together with the DSL, the three Deputy DSLs have a legal responsibility for dealing with safeguarding issues, providing advice and support to staff, liaising with the Local Authority, and working with a range of other agencies.

#### **Manage referrals**

- refer cases of suspected abuse to the local authority children's social care as required;
- support staff who make referrals to local authority children's social care;
- refer cases to the Channel programme where there is a radicalisation concern as required;
- support staff who make referrals to the Channel programme;
- refer cases where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service as required; and
- refer cases where a crime may have been committed to the Police as required.

#### **Work with others**

- liaise with the Principal to inform her of issues especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations;
- as required, liaise with the "case manager" and the designated officer(s) at the local authority for child protection concerns in cases which concern a staff member;
- liaise with staff (pastoral support staff, school matron, IT Technicians, and SENCO) on matters of safety and safeguarding, including online and digital safety, and when deciding whether to make a referral by liaising with relevant agencies; and
- act as a source of support, advice and expertise for all staff.

#### **Training**

The deputy designated safeguarding lead will undergo training to provide them with the knowledge and skills required to carry out the role. This training will be updated at least every two years.

The deputy designated safeguarding lead will undertake Prevent awareness training. In addition to the formal training set out above, their knowledge and skills will be refreshed (this might be via e-bulletins, meeting other designated safeguarding leads, or simply taking time to read

and digest safeguarding developments) at regular intervals, as required, and at least annually, to allow them to understand and keep up with any developments relevant to their role so they:

- understand the assessment process for providing early help and statutory intervention, including local criteria for action and local authority children's social care referral arrangements.
- have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so;
- ensure each member of staff has access to, and understands, the College's child protection policy and procedures, especially new and part time staff;
- are alert to the specific needs of children in need, those with special educational needs and young carers;
- are able to keep detailed, accurate, secure written records of concerns and referrals;
- understand and support the College with regards to the requirements of the Prevent duty and are able to provide advice and support to staff on protecting children from the risk of radicalisation;
- are able to understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online at College;
- can recognise the additional risks that children with SEN and disabilities (SEND) face online, for example, from online bullying, grooming and radicalisation and are confident they have the capability to support SEND children to stay safe online;
- obtain access to resources and attend any relevant or refresher training courses; and
- encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the College may put in place to protect them.

### **Raise Awareness**

- ensure the College's child protection policies are known, understood and used appropriately;
- ensure the College's child protection policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with governing bodies or proprietors regarding this;
- ensure the child protection policy is available publicly and parents are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the College in this; and
- link with the local LSCB to make sure staff are aware of any training opportunities and the latest local policies on local safeguarding arrangements.

### **Availability**

During term time the deputy designated safeguarding lead should always be available (during College hours) for staff in the College to discuss any safeguarding concerns. Whilst generally speaking the deputy designated safeguarding lead would be expected to be available in person, in exceptional circumstances availability via phone and or Skype or other such media is acceptable.

