

Safeguarding Children (including Child Protection) Policy

Every pupil should feel safe and protected from any form of abuse and maltreatment which could impair his/her/their mental and/or physical health or development. In this policy, this means any kind of physical, emotional or sexual abuse or ill-treatment, or neglect.

There are a wide range of adults to whom pupils can turn for help. These include Housems, Teaching staff, House staff, the Chaplain, the College Medical staff, the Designated Safeguarding Lead, the Deputy Designated Safeguarding Leads, the Senior Deputy Head, the Deputy Head, the Director of Pastoral Welfare, College Counsellors and the College's Independent Listeners.

The College aims to raise pupils' awareness of Safeguarding issues through induction processes, the curriculum, and Life Skills lessons as well as through the tutorial system and within the Houses. Pastoral care and College Policies ensure that pupils have a range of contacts and strategies for their own protection and an understanding of the importance of protecting others. In performing its safeguarding duties and when responding to safeguarding situations, the College will consider at all times what is in the best interests of the child.

The policy is updated annually and has been updated in response to Keeping Children Safe in Education (KCSiE), September 2026; it is ratified by the College Council in December having been checked by the Vice Chair of the College Council and Chair of the College Board, Sue Duff, and the Safeguarding Governor, Andy Collins, in September. It is further updated if needed to reflect emerging and evolving safeguarding issues, including lessons learnt.

The trustees of the Corporation of Malvern College (the "Council") have delegated oversight for Safeguarding and Child Protection to the Malvern College Board (the "Board"). The Board is a sub-committee with duties and responsibilities to monitor the School's compliance, and encourage the highest quality outcomes for all parts of the Independent School Standards Regulations (ISSRs) and the National Minimum Standards (NMS) for boarding. The Board terms of reference (the "ToR") are defined by Council, and specify that:

1. one member of the Board shall be responsible for the oversight of safeguarding arrangements;
2. the Board will regularly update Council on its work, through the publication of minutes and other reports as appropriate.

The Council includes a designated Safeguarding trustee (Mr. Andy Collins) who chairs the Safeguarding and Child Protection sub-committee. This sub-committee meets a minimum of once per term to review the relevant policies, plans, and procedures in place. It is attended by the safeguarding Board member of each of Malvern College, The Downs Malvern, MCIL and MCEL.

Whilst the Council remains responsible for safeguarding and has active involvement, oversight has been delegated. The Chairs of both the College Board and of the Safeguarding Committee present to Council three times per year.

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Who's Who in Safeguarding: Key Personnel

Mrs Emma Brown is the Designated Safeguarding Lead (DSL). The DSL has lead responsibility for the safeguarding of pupils at the College, for ensuring staff are recruited and trained safely (working closely with the Head of Human Resources, Liz Zidani), and for monitoring the progress of any pupil needing additional support or protection. Mrs Brown is also the Prevent Single Point of Contact and the Child Sexual Exploitation (CSE) Lead. The DSL is also responsible for online safety. **See Appendix 3, Responsibilities of the Designated Safeguarding Lead**, for additional information.



Mrs Brown can be contacted on 01684 581609 or by email: emma.brown@malverncollege.org.uk and safeguarding@malverncollege.org.uk (this is a shared mailbox also accessible to the Deputy DSLs).

Deputy DSLs:

Ms Hannah Clarke is Deputy DSL; she can be contacted on 01684 581685 or by email: hannah.clarke@malverncollege.org.uk

Mrs Vanessa Young is the Director of Pastoral Welfare, Mental Health Lead and Deputy DSL. Mrs Young can be contacted on 01684 581642 or by email: vanessa.young@malverncollege.org.uk

Mr Mark Hardinges is the Director of Sport and Deputy DSL. He can be contacted by email on mark.hardinges@malverncollege.org.uk

Mrs Emily King is Deputy DSL and **Online Safety Co-Ordinator**. She can be contacted by email on emily.king@malverncollege.org.uk

Mr Lewis Faulkner is the Deputy Head and also a Deputy DSL. He can be contacted on 01684 581691 or by email lewis.faulkner@malverncollege.org.uk

Mrs Penny Bijl is a Deputy DSL and can be contacted by email on penny.bijl@malverncollege.org.uk

Other Staff Supporting Safeguarding

Mr Steve Cragg is Director of ICT Services, Data Compliance Officer and **Online Safety Officer**. He can be contacted by email steve.cragg@malverncollege.org.uk

Mrs Emily Ireson is the Attendance Officer and **Mrs Vanessa Young** is the Attendance Champion.

Mr Andy Collins is the Safeguarding Governor and can be contacted through Sarah Clifton (Assistant Clerk to Council): sarah.clifton@malverncollege.org.uk.

Who this document applies to:

- This document applies to all young people under 18 at Malvern College, and to all pupils on the College roll who are 18 and over.
- Anyone coming into contact with our pupils or visiting the College site must abide by this policy.
- Everyone working at the College as a member of staff, supply teacher or volunteer has a duty to safeguard and protect our pupils. They must read this policy and agree to work to it. Visitors (e.g. visiting speakers) and contractors must also comply with it.

Valuing Diversity

Diversity is a strength, and we promote inclusive behaviours and respect for all people and groups. Discrimination can be a safeguarding issue and we will take appropriate action if pupils' behaviour or comments are discriminatory, including racist, working with other agencies if necessary. If staff or volunteers behave in a way that discriminates against particular groups, or is racist, we will act immediately to rectify the issue in line with the College's Code of Conduct.

Human Rights Act

The Human Rights Act 1998 (HRA) sets out the fundamental rights and freedoms that everyone in the UK is entitled to and contains the Articles and protocols of the European Convention on Human Rights (ECHR) that are deemed to apply in the UK.

Being subjected to harassment, violence or abuse, including that of a sexual nature, may breach any or all of these rights, depending on the nature of the conduct and the circumstances. Further information can be found at <https://www.equalityhumanrights.com/en>.

Further Information

In addition to this Safeguarding Policy, the following documents are available in the staff handbook and copies can be obtained from the Designated Safeguarding Lead:

- 'Working Together to Safeguard Children' 2026.
- Keeping Children Safe in Education, (Department for Education) September 2026 (note it is a statutory requirement for all staff to read and understand Part 1 of this document).
- Guidance for Safer Working Practice for Adults who work with Children and Young People in Education Settings (February 2022) <https://c-cluster-110.uploads.documents.cimpress.io/v1/uploads/d71d6fd8-b99e-4327-b8fd-1ac968b768a4~110/original?tenant=vbu-digital>
- Malvern College Staff Code of Conduct.

Introduction

Malvern College recognises the contribution it can make to protect and support pupils in the school. The aim of this policy is to safeguard and promote our pupils' welfare, safety, health and well-being by creating an honest, open, caring and supportive environment in which pupils' welfare is of paramount importance. This policy is based on the following legislation and guidance:

- The Children Act 1989 and 2004
- The Rehabilitation of Offenders Act 1974, amended 2023
- Section 175 of the Education Act 2002
- Education Acts 2002 and 2011
- Sexual Offences Act 2003
- Female Genital Mutilation Act 2003
- Counter Terrorism and Security Act, 2015
- Data Protection Act 2018, UKGDPR (2021) and the Data (Use and Access) Act 2025
- Voyeurism Offences Act 2019
- Domestic Abuse Act 2021
- Online Safety Act 2023 (including illegal content duties, March 2025 and child safety duties, July 2025)
- Children's Wellbeing and Schools Act 2026

Key Guidance, including statutory guidance:

- 'Keeping Children Safe in Education' September 2026
- 'Working Together to Safeguard Children' 2026
- Education (Independent School Standards) Regulations 2014 (amended 2024)
- "What to do if you're worried a child is being abused" (March 2015).
- SEND Code of Practice 2015 (Updated 2020)
- Relationship Education, Relationships and Sex Education (RSE) and Health Education 2019 (updated July 2025)
- Mandatory Reporting of FGM, Guidance 2020
- Child Sexual Exploitation, DfE 2017
- Guidance for safer working practice for those working with children and young people in education settings, February 2022 (Safer Recruitment Consortium)
- Behaviour in schools. Advice for headteachers and school staff (February 2024).
- Searching, Screening and Confiscation, DfE July 2022
- Domestic Abuse Guidance 2022
- Prevent Duty Guidance for England and Wales, HM Government, September 2023
- DfE The Prevent Duty: safeguarding learners vulnerable to radicalisation, updated September 2023
- Forced Marriage Guidance 2023
- UKCIS Sharing nudes and semi-nudes: advice for education settings working with children and young people (2020, updated March 2024)
- Information Sharing, DfE May 2024
- Children Missing Education: Statutory Guidance for Local Authorities DfE August 2024
- Working Together to Improve School Attendance 2024 (DfE, 2024)
- Meeting Digital and Technology Standards in Schools and Colleges (DfE 2022, 2025)
- Charity Commission Guidance
- Restrictive interventions, including use of reasonable force in schools, guidance for schools in England, April 2025
- Modern slavery, statutory guidance for England and Wales 2020

The College will also fulfil its national and local responsibilities as laid out in the following additional documents:

West Midlands procedures [Welcome to the West Midlands Regional Safeguarding...](#)

Joint Herefordshire and Worcestershire Safeguarding 'Multi-Agency Levels of Need' Guidance: [JN2526.179 Herefordshire and Worcestershire Levels of Need](#) (Sept. 2025).

Malvern College (the College) also recognises its moral and statutory responsibilities for safeguarding and promoting the welfare of children, including the importance of understanding and working with multi-agency safeguarding arrangements.

The College works with local partners from Worcestershire Safeguarding Children Partnership (WSCP) to identify and respond to children's needs and supplies information as requested by the safeguarding partners. The College also works with the police, health and other services, supports Family Help referrals when additional needs of pupils are identified and contributes to multi-agency plans for pupils subject to child protection plans. We allow access as appropriate for local authority Children's Social Care to conduct or consider whether to conduct a section 17 or section 47 assessment.

Our policy applies to all full-time and part-time teaching and support staff, governors, temporary staff, trainee teachers, volunteers and contractors working in the College. (Please note that separate Safeguarding Policies operate at The Downs Malvern, and Malvern College International schools).

The policy applies wherever staff, supply staff or volunteers are working with pupils even where this is away from the College, for example at an activity centre or on an educational visit.

There are five main elements to our policy:

- Ensuring we practise safer recruitment in checking the suitability of staff and volunteers to work with children;
- Raising staff awareness of child protection issues and equipping our pupils with the skills needed to keep them safe;
- Developing and then implementing procedures for identifying and reporting cases, or suspected cases, of abuse;
- Supporting pupils who have been identified as in need of safeguarding support, including those in need of family help or at risk of harm and, if appropriate, in accordance with his/her/their agreed Child Protection, Child in Need or Family Help plan;
- Establishing a safe environment in which our pupils can learn and develop.

We recognise that because of the day-to-day contact with children, College staff are well placed to identify concerns early and to observe the outward signs of abuse.

The College will therefore:

- Establish and maintain an environment where pupils feel safe, secure, valued and respected and are encouraged to talk, believing they will be listened to and their

points of view valued;

- Ensure pupils know that there are adults in the College whom they can approach if they are worried;
- Have regard to the DfE statutory guidance “Relationships Education, relationships and sex education (RSE) and health education” (June 2019, updated 2025) by including opportunities in the curriculum, including through Life Skills, new pupil induction and regular talks (eg assemblies), for pupils to develop the skills they need to recognise and stay safe from abuse and to know who they should turn to for help.

We seek to ensure that the pupil's wishes and feelings are taken into account when determining what action to take and what services to provide to protect them from harm.

To this end, the College will:

- Ensure there are systems in place for pupils to express their views and give feedback e.g. through College/House councils, peer mentors, Pupil Thrive, the pastoral questionnaire, regular well-being questionnaires, Whisper (anonymous online reporting service) and the promotion of anti-bullying and online safety initiatives;
- Ensure that the pupil's thoughts/wishes and feelings are sought and recorded when making referrals to other agencies.

Part One

Safeguarding Principles: A Whole school approach

We will follow the West Midlands Safeguarding Procedures, work closely with Worcestershire Safeguarding Children Partnership ([WSCP - Worcestershire Safeguarding Boards](http://wscp-worcestershire-safeguarding-boards.safeguardingworcestershire.org.uk) (safeguardingworcestershire.org.uk) and take account of guidance issued by the Department for Education (DfE).

The College Board is responsible for ensuring that all staff understand their safeguarding responsibilities. The College will:

- Ensure it has a Designated Safeguarding Lead (DSL) who represents safeguarding on the Senior Leadership team and has received appropriate training and support for the DSL role;
- Ensure it has at least one member of staff who will act in the absence of the DSL;
- Ensure it has a nominated governor or governors responsible for safeguarding children;
- Ensure every member of staff (including temporary and supply staff, volunteers and contractors) and the College Council knows the name of the DSL and any deputies and understand their roles;
- Ensure that a DSL and/or a deputy DSL is always available to speak to during College hours (including by phone and/or TEAMS), and has made adequate and appropriate cover arrangements for any out of hours/out of term time activities;
- Ensure all staff and volunteers who come into contact with pupils are alert to the potential need for Early or Family Help, are aware of those children whose vulnerabilities may indicate a greater need and are aware of the role they may play in supporting other agencies and professionals in a Family Help assessment;
- Ensure all staff and volunteers understand their responsibilities in being alert to the signs of abuse and neglect, including the specific issues of Child-on-Child abuse, Female Genital Mutilation (FGM), Child Sexual Exploitation (CSE), Child Criminal Exploitation (CCE), Modern Slavery, Children Missing Education (CME), Radicalisation and Extremism (Prevent), Serious Violence, and Sexual Violence and Sexual Harassment, and maintain an attitude of 'it could happen here';
- Ensure all staff and volunteers understand their responsibility for referring any concerns to the DSL, Deputy DSLs or Headmaster in a timely manner and are aware that they may raise concerns directly with Local Authority Children's Social Care Services if they believe their concerns have not been listened to or acted upon;
- Ensure that parents have an understanding of the responsibility placed on the College and staff for child protection by publishing its policy on the College website;
- Operate a vetting policy which ensures the suitability of adults working with children on College sites at any time;
- Ensure that community users organising activities for children are aware of, and understand the need for compliance with, the College's child protection guidelines and procedures;
- Ensure that the duty of care towards its pupils and staff is promoted by raising awareness of illegal, unsafe and unwise behaviour and assist staff to monitor their own standards and practice;
- Ensure that all staff and volunteers feel able to raise concerns about poor or unsafe practice and are aware of whistleblowing procedures and helplines;
- Be aware of and follow procedures set out by the DfE and WSCP where an allegation of abuse is made against a member of staff or volunteer, including making a referral to the local authority Designated Officer (LADO);

- Ensure that a referral is made to the DBS and/or Teaching Regulation Agency (TRA) if a person in regulated activity has been dismissed or suspended or removed from regulated activity where the harm criterion is met, or would have been had they not resigned;
- Operate safer recruitment practice, ensuring that at least one member on every recruitment panel has completed safer recruitment training.

Our procedures will be regularly reviewed and updated at least annually unless an incident or new legislation or guidance requires the need for an interim review. We recognise the expertise our staff builds by undertaking safeguarding training and managing safeguarding concerns on a daily basis. We therefore invite relevant staff to contribute to and shape this policy and associated safeguarding arrangements.

Abuse of Position of Trust: all College staff are aware that inappropriate behaviour towards pupils is unacceptable and that their conduct towards pupils must be beyond reproach. They know that, under the Sexual Offences Act 2003, it is an offence for a person over the age of 18 to have a sexual relationship with a person under the age of 18, where that person is in a position of trust, even if the relationship is consensual. It is also unacceptable for any member of staff to have a sexual relationship with a pupil over 18, where the member of staff is in a position of trust.

Reporting Principles and Procedures

Take Action: A member of staff needs only reasonable cause for concern in order to take action. One sentence from a child indicating abuse, exploitation or neglect, or non-accidental injury, provides reasonable grounds and is sufficient need to act. This may also apply if clear information comes from another child or adult.

The member of staff must report the matter to the DSL or, in her absence, to one of the Deputy DSLs, as soon as possible, unless it is an allegation against a member of staff or volunteer in which case the procedures set out in Part 4 of this document should be followed.

All members of staff, including volunteers working with children at our College, are advised to maintain an attitude of 'it could happen here' where safeguarding is concerned, should always act in the interests of the child and have a responsibility to take action as outlined in this policy. They should not assume a colleague or another professional will take action and must share information that might be critical in keeping children safe.

All staff should be aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. For example, children may feel embarrassed, humiliated or threatened. This could be due to their vulnerability, disability and/or sexual orientation or due to language barriers. This should not prevent staff from having a **professional curiosity** and speaking to the DSL if they have concerns about a child. It is also important that staff determine how best to build trusted relationships with children and young people, which facilitate communication.

If a child is in immediate danger or at risk of harm, the DSL must be informed, and a referral made (preferably by the DSL) to Local Authority Children's Social Care and/or the police immediately or within 24 hours.

Key points for staff:

- In an emergency, and/or there is a risk of immediate serious harm to a pupil, take the action necessary to help the child/young person (including calling 999);
- Report the concern as soon as possible to the DSL (or a Deputy DSL), definitely by the end of the day;
- Do not start your own investigation;
- Share information relevant to the safeguarding concern but on a need-to-know basis (do not discuss with other colleagues, friends or family);
- Complete a record of concern as requested by the DSL;
- Seek support for yourself if you are distressed by the situation. (The DSL and/or the Mental Health Lead can advise and help.)

If there is a concern about a pupil's welfare/suspicion a pupil may be at risk: All staff are encouraged to report any concerns that they have and not see these as insignificant. On occasions, a referral is justified by a single incident such as an injury or disclosure of abuse. More often, however, concerns accumulate over a period of time and are evidenced by building up a picture of harm over time; this is particularly true in cases of emotional abuse and neglect. In these circumstances, it is crucial that staff record and pass on concerns to the DSL, in accordance with this policy, to allow the DSL to build up a picture and access support for the child at the earliest opportunity. A reliance on memory without accurate and contemporaneous records of concern could lead to a failure to protect.

The Safeguarding Reporting Form at Appendix 2 of this policy may be used to document concerns, and hard copies are also available from the General Office and the DSL. The CPOMS safeguarding recording system is also used to document safeguarding concerns and responses.

A member of staff may refer a matter directly to Local Authority Children's Social Care in exceptional circumstances such as in an emergency or if there is a genuine concern that appropriate action has not been taken.

It is not the responsibility of College staff to **investigate** welfare concerns or determine the truth of any disclosure or allegation. Their duty is to recognise concerns and pass the information on in accordance with the procedures outlined in this policy.

The Designated Safeguarding Lead (DSL) should be used as the first point of contact for concerns and queries regarding any safeguarding concern in the College. Any member of staff or visitor to the College who receives a disclosure that a child is being abused, exploited or neglected, or suspects that a child is at risk of harm, must report it immediately to the DSL or, if unavailable, to one of the Deputy Designated Safeguarding Leads. In the absence of any of the above, the matter should be brought to the attention of the most senior member of staff.

Following receipt of any information raising a concern, the DSL will consider what action to take and seek advice from Local Authority Children's Services as necessary. There will be appropriate discussions with parents/guardians prior to referral to local authority children's social care or another agency unless to do so would put the child at risk or compromise an investigation. All information and actions taken, including the reasons for any decisions made, will be fully documented.

Where we identify children in need of support, we will act in accordance with the Regional Child Protection Procedures [Welcome to the West Midlands Regional Safeguarding...](#) and Joint Herefordshire and Worcestershire Safeguarding 'Multi-Agency Levels of Need' Guidance: [JN2526.179 Herefordshire and Worcestershire Levels of Need](#) (Sept. 2025).

If the pupil's situation does not appear to be improving, or the concern is not addressed, the staff member with concerns should press for re-consideration by raising the matter again with the DSL and/or the Headmaster or directly with Local Authority Children's Services. Concerns should always lead to help for the pupil at some point.

Where unmet needs have been identified for a pupil but there is no evidence of significant risk, the DSL will oversee the delivery of an appropriate Family Help response. This may include a multi-agency response and/or ongoing school focused support.

Figure 1 Flowchart: actions taken where there are concerns about a child

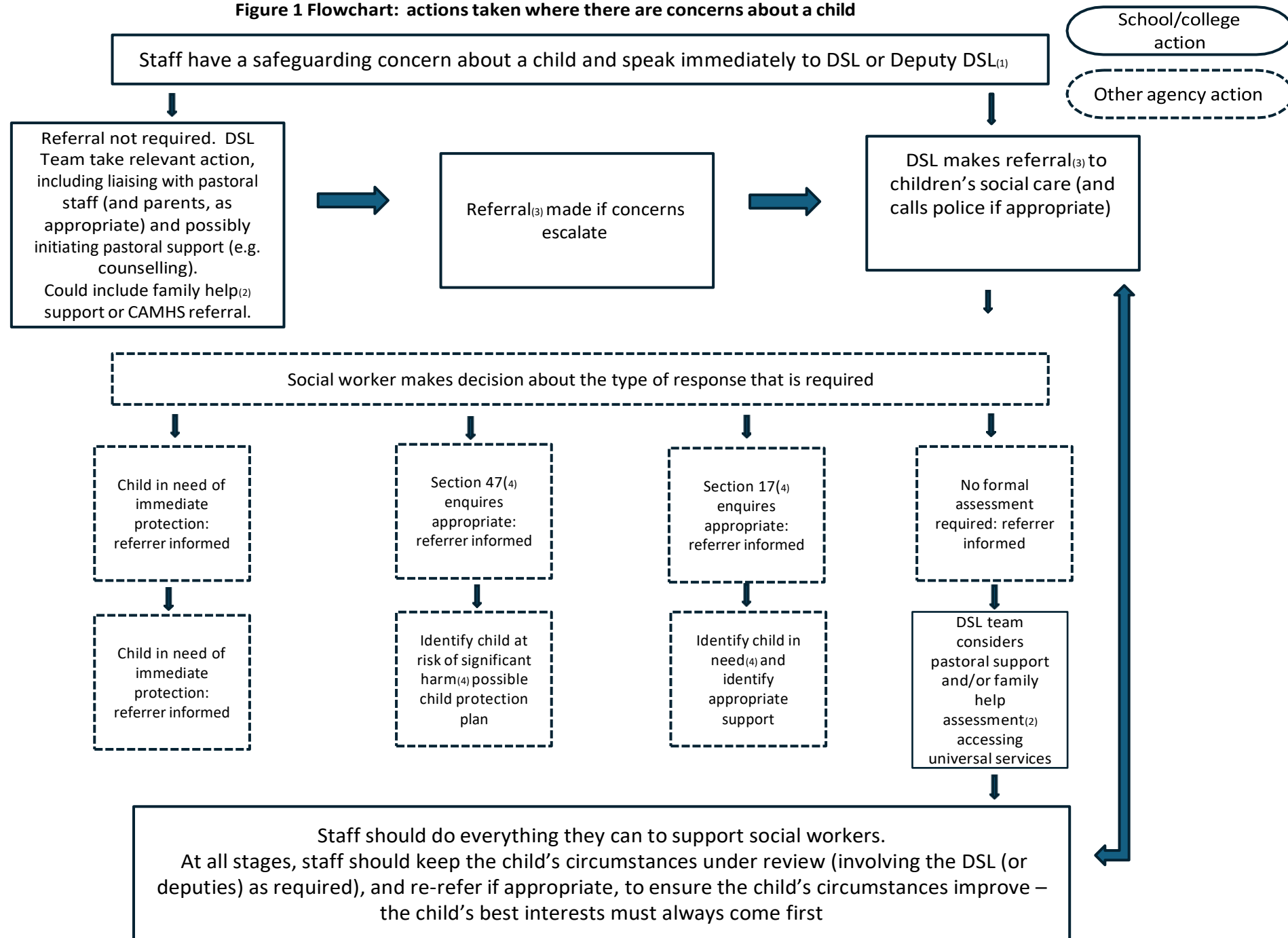


Figure 1 Flowchart: actions taken where there are concerns about a child

- 1) In cases which also involve a concern or an allegation of abuse against a staff member, staff speak to the Headmaster (or to the DSL if a low-level concern).
- 2) Family 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 family help, a family help inter-agency assessment should be arranged. Working Together to Safeguard Children provides detailed guidance on the family help process.
- 3) Referrals should follow the process set out in the local threshold document and local protocol for assessment. See [Working together to safeguard children 2026: statutory guidance](#)
- 4) 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. Children in need may be assessed under section 17 of the Children Act 1989. Under section 47 of the Children Act 1989, where a local authority has reasonable cause to suspect that a child is suffering or likely to suffer significant harm, it has a duty to make enquires to decide whether to take action to safeguard or promote the child's welfare. Full details are in [Working together to safeguard children 2026: statutory guidance](#)
- 5) This could include applying for an Emergency Protection Order (EPO).

Staff Safeguarding Training

When staff join Malvern College, they will be informed of the arrangements in place to safeguard children. All staff will be given a copy of this policy including its Appendices, and relevant sections of KCSiE.

The DSL and deputies will be supported to access and provide additional training, as appropriate, including training in behaviour and mental health.

All staff will receive appropriate safeguarding and child protection training (including in online safety) at induction. They will also be familiar with the Safeguarding Policy, the Promoting Good Behaviour and Discipline policy, the Staff Code of Conduct, the College's policy on Children Missing from Education (CME) and be informed about the role of the designated safeguarding lead (including the identity of the Designated Safeguarding Lead and any deputies).

The induction programme will include basic child protection information relating to promoting pupils' welfare, including their mental as well as their physical health, recognising signs and symptoms of abuse, how to manage a disclosure from a child, when and how to record a concern about the welfare of a child, online safety and advice on safe working practice. Induction training and regular update training will ensure that staff have an understanding of the expectations, roles and responsibilities in relation to the College's ICT filtering and monitoring systems.

All volunteers, temporary staff and regular visitors to our College will be told where our policy is kept, given the name of the DSL and deputies and informed of the College's procedures in reporting concerns.

All operational staff will receive training in child protection and safe working practice, updated at least once every three years. Training will include signs and symptoms of abuse and neglect, as well as specific safeguarding issues, such as sexual or criminal exploitation, County Lines, honour or faith-based abuse, FGM, Prevent, serious crime, line safety (and sexting), and child-on-child abuse, specifically including responding to and reporting allegations of sexual violence and sexual harassment.

All College staff will also be trained to be vigilant in recognising and responding to need arising from health conditions, young people's mental health needs, from having a parent in prison (or being affected by parental offending) and in understanding the risks to a child who is persistently missing from education. Training will also include how to record and report abuse to Local Authority Children's Social Care.

In addition, teaching staff and staff responsible for pastoral care will receive ongoing safeguarding and child protection refresher training and updates covering current safeguarding trends and issues, including in online safety and the filtering and monitoring systems, from the DSL (and online safety team), as required, but at least annually (eg via email, staff meetings, INSET training etc). Staff are also supported to attend Youth Mental Health First Aid training. Refresher training is available every three years.

Staff with specific responsibility for safeguarding children will undertake both single and inter- agency training at a level suitable to their role and responsibilities, updated every two years. In addition to formal training the DSL and deputy/ies will update their knowledge and

skills via briefings, WSCP newsletters and briefings, and safeguarding seminars or conferences, at regular intervals, and at least annually.

Staff with leadership responsibilities will undertake further relevant training in safeguarding related issues such as CSE, FGM, Radicalisation, Sexual Violence and Sexual Harassment, and the Management of Allegations of Abuse, as appropriate, and cascade the learning from this training to relevant staff.

The College's Lower Sixth pupils and Peer Mentors are provided with safeguarding training during their induction and in addition, aspects of anti-bullying and child-on-child abuse policies and guidance are discussed with members of the Pupil and Staff Thrive groups, demonstrating that pupils and staff are consulted.

Our Governors and trustees receive appropriate and regular safeguarding and child protection training (including online safety and an understanding of the expectations of filtering and monitoring) to enable them to oversee the safeguarding culture of the College, and to ensure that there is an effective whole school approach to safeguarding.

The Safeguarding Governor receives additional training to empower him/her to challenge the DSL and support the delivery of high quality safeguarding across the College.

DSL/Deputy DSL Training

The Designated Safeguarding Lead and Deputy Designated Safeguarding Leads undertake child protection training and training in multi-agency working (to understand the processes, procedures and responsibilities of other agencies) and will attend refresher training at two-yearly intervals in order to:

- understand the assessment process for providing family help and intervention, for example through locally agreed common and shared assessment processes such as family help assessments;
- 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;
- be alert to the specific needs of children in need, those with special educational needs and young carers;
- be able to keep detailed, accurate, secure written records of concerns and referrals, using CPOMS as appropriate;
- obtain access to resources and attend any relevant or refresher training courses;
- encourage, among all staff, a culture of listening to children and taking account of their wishes and feelings, in any measures the College may put in place to protect them and to meet the requirements and procedures of the Worcestershire Safeguarding Children Partnership.
- The DSL undertakes Prevent Awareness training as appropriate and will support the

College regarding the Prevent Duty requirements, providing advice and support to staff on protecting children from risk of radicalisation.

Safeguarding Responsibilities

The College Board will oversee and ensure that the appropriate arrangements are in place to enable staff to understand and discharge their safeguarding roles and responsibilities, and will facilitate a whole-school approach to safeguarding and to promoting the welfare of pupils, ensuring that safeguarding and child protection are central to relevant process and policy development.

The College Board will nominate the Safeguarding Governor, Andy Collins, to take leadership responsibility for safeguarding children and liaise with the DSL and/or Headmaster in matters relating to safeguarding. It will ensure that:

- the DSL takes lead responsibility for safeguarding and child protection and does not delegate this responsibility;
- the DSL and Deputy DSL roles are explicit in the role holders' job descriptions, which reflect KCSiE guidance;
- safeguarding policies and procedures are in place, available to parents on the College website or by other means and are reviewed at least annually;
- safeguarding responses are put in place in cases where children go missing from education;
- an annual report on the effectiveness of the College's safeguarding procedures is presented to the College Board and any returns requested by the local authority/WSCP are completed in a timely manner;
- any weaknesses brought to its attention relating to safeguarding are remedied without delay;
- it complies with all legislative duties, including the duty to report suspected or known cases of FGM and the duty to prevent young people from being drawn into terrorism.

The Headmaster will ensure that:

- The Safeguarding policies and procedures are effectively implemented and followed by all staff;
- Sufficient funding, support, time and resources are allocated to enable the DSL and other staff to discharge their responsibilities with regard to child protection;
- All staff feel able to raise concerns about poor or unsafe practice and that these are handled sensitively and in accordance with the whistleblowing procedures;
- All allegations of abuse involving Members of Staff are reported to the Local Authority Designated Officer (LADO) in a timely manner.

The DSL will co-ordinate action and risk assessments for safeguarding and promoting the welfare of children within the College setting and will discuss regularly with the Headmaster.

The DSL and deputies will work closely with teachers to promote educational outcomes where they have safeguarding or child protection concerns.

The Role of the DSL (See Appendix 3 of this policy)

The role of the DSL at Malvern College reflects the expectations and requirements set out in KCSiE 2026 (Annex B)

The DSL takes lead responsibility for:

- Safeguarding and Child Protection (including online safety), and will not delegate this responsibility;
- Providing training to ensure that all staff understand and are able to discharge their roles and responsibilities as set out in Part One of Keeping Children Safe in Education;
- Undertaking, in conjunction with the Headmaster and Safeguarding Governor, an annual audit of safeguarding procedures;
- Managing safeguarding referrals to external agencies;
- Making use of the Levels of Need guidance when making a decision about whether the threshold for Family Help or Social Care intervention is met;
- Keeping secure records of concerns about children, including the use of body maps, even where there is no need to refer the matter immediately;
- Ensuring that, when children leave the College, their child protection file is transferred to the new school or college as soon as possible, and within 5 days for an in-year transfer or within the first 5 days of the start of a new term to allow the new school or college to have support in place promptly. The DSL will ensure secure transit, and confirmation of receipt; this file will be transferred separately from the main pupil file. Receiving schools/colleges should ensure that key staff (eg DSLs, SENDCos) are aware as required.
- Developing effective links with relevant agencies and other professionals, including Senior Mental Health Leads, and co-operating as required with their enquiries regarding safeguarding matters including co-operation with serious case reviews, attendance at strategy meetings, initial and review child protection conferences, core group and “child in need” review meetings;
- Liaising with other staff (for example Housems, pastoral support staff, medical centre staff or counsellors, the online safety team, the SENDCo and ICT) on matters of safety and safeguarding and when deciding whether to make a referral by liaising with relevant agencies;
- Liaising with the Head of Life Skills (Mrs Heidi Andrews), to co-ordinate a programme of safety, health and well-being through the curriculum, including issues of protective behaviours, healthy relationships and staying safe online: [Relationships Education, Relationships and Sex Education and Health Education guidance](#) (July 2025).
- Liaising with the Deputy Head (Mr Lewis Faulkner) regarding the promotion of democratic values;
- Acting as a source of support, advice and expertise for all staff;
- Helping to promote educational outcomes by sharing with teachers and the College Leadership team, where appropriate, information about the welfare, safeguarding and child protection issues that pupils are experiencing or have experienced. This is to ensure an understanding of factors affecting pupils’ academic progress and attainment, to aid identification of additional academic support and adjustments that could be made to support these pupils and to maintain a culture of high aspirations for this cohort.

Any steps taken to support a pupil who has a safeguarding vulnerability must be reported to the DSL or deputies.

Staff will be informed of relevant details regarding a safeguarding incident or circumstances when the DSL feels that their having knowledge of a situation will improve their ability to support an individual pupil or family.

During term time, the DSL (or deputy) will be available during College hours for staff in the school to discuss any safeguarding concerns. Adequate and appropriate contact or cover arrangements will be made for out of term time.

Part Two

Specific Safeguarding Issues

Mental Health

KCSiE emphasises the impact of abuse, neglect or other potential adverse childhood experiences on mental health, behaviour and education in children and young people.

All staff will be made aware that mental health problems can sometimes be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

All staff will take immediate action and speak to the DSL or Mental Health Lead (or one of the Deputy DSLs), as well as the relevant Housem, if they have a mental health safeguarding concern about a pupil. DfE guidance is available in the Mental Health in Schools guidance: Mental health and behaviour in schools - GOV.UK (www.gov.uk)

College pupils are also supported by two qualified counsellors (Lucy Davies and Bex Allport), who are employed by the College, work closely with the Housems and Safeguarding Team and to whom pupils can self-refer. The counsellors can be contacted via the College Medical Centre.

The Director of Pastoral Welfare is the Mental Health Lead, heading up a Mental Health Team to include (but not limited to) the DSL and deputy DSL(s), Deputy Head, Head of Life Skills (PSHE), College counsellor, Mental Health First Aid trainer and SENDCo.

Child-on-Child Abuse

Details of Malvern College's response to concerns about or instances of Child-on-Child Abuse can be found in in our separate Child-on-Child Abuse Policy.

We recognise that children are potentially vulnerable to physical, sexual and emotional abuse by other children, their peers or siblings and that abuse perpetrated by children can be just as harmful as that perpetrated by an adult, so it is important to remember the impact on the victim of the abuse as well as to focus on the response and support for the child or young person exhibiting the harmful behaviour (the perpetrator).

The College takes a zero-tolerance approach to child-on-child abuse and staff understand the importance of challenging inappropriate behaviours. Such behaviours, including sexual harassment and sexual violence, should never be tolerated or passed off as "banter", "just having a laugh" or "part of growing up" etc.

Malvern College also recognises, as identified in KCSiE 2026 that it is more likely that girls will be victims and boys perpetrators, but that all child-on-child abuse is unacceptable and will be taken seriously. Staff are aware that some groups are potentially more at risk, for example, children with SEND and LGB and gender-questioning children.

The different forms child-on-child abuse can take include but are not limited to:

- sexual violence, such as rape, assault by penetration and sexual assault (and which may include an online element which facilitates, threatens and/or encourages sexual violence);
- sexual harassment (such as sexual comments, remarks or jokes and online sexual harassment which may be stand-alone or part of a broader pattern of abuse);
- abuse within intimate personal relationships between peers;
- causing someone to engage in sexual activity without consent, such as forcing

someone to strip, touch themselves sexually or to engage in sexual activity with a third party;

- upskirting, which typically involves taking a picture under a person's clothing (not necessarily a skirt) without their permission and/or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification or cause the victim humiliation, distress or alarm. This is now a criminal offence. Anyone of any gender can be a victim;
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (and potentially including an online element which facilitates, threatens and/or encourages physical abuse);
- consensual and non-consensual sharing of nudes and semi-nudes as images (visual content, such as photographs, videos or livestreams);
- bullying (including cyberbullying, prejudice-based and discriminatory bullying)
- gender-based violence/sexual assaults and sexting
- initiation/hazing type violence and rituals.

All staff are made aware of the College policy and processes in dealing with instances of child-on-child abuse (See Child-on-Child Abuse Policy and the Anti-Bullying Policy). Our staff understand that, even if there are no reports of child-on-child abuse, this does not mean that it is not happening; it may be that it is not being reported.

We aim to make sure that there are accessible systems through which pupils can report abuse, and to create a whole-school culture in which pupils feel able to share concerns, by:

- ensuring the response is sensitive, proportionate and prompt;
- ensuring that there is a range of people with whom pupils can raise concerns/report abuse (including House staff, the safeguarding team, Medical Centre personnel, the Chaplain, school counsellors and Peer Mentors);
- developing discreet locations in which pupils can talk with privacy (including the Safeguarding Office, Well-Being Room, Medical Centre and Chaplaincy);
- developing an online anonymous reporting facility which allows pupils to ask questions, ask for help or express concerns;
- providing information about external sources of help (eg Childline).

We will ensure, through training, that staff, volunteers and College Board will have an understanding of the range of child-on-child abuse, including sexual violence and sexual harassment, and will be made aware of how to recognise, report and manage such issues.

Staff should be aware that such incidents and/or behaviours can be associated with factors outside the College and can occur between children outside the College. Staff, and particularly the DSLs, should always be aware of contextual safeguarding issues and consider whether pupils are at risk of abuse or exploitation in situations outside their families and/or online.

Where the abuse is physical, verbal, bullying or cyber-bullying, the response, recording of such incidents and sanctions will be applied in line with the child-on-child abuse response outlined in this policy and in the separate Child-on-Child Abuse Policy, and with the Promoting Good Behaviour and Discipline Policy (which reflects the DfE Behaviour in Schools Guidance 2024: [Behaviour in schools - GOV.UK](https://www.gov.uk/guidance/behaviour-in-schools) and the College's Anti- Bullying policy. Where a child discloses safeguarding allegations of a sexual nature against another pupil in the same setting, the DSL will refer to the DfE guidance, West Midlands Safeguarding Children procedures website and seek advice from

police, Worcestershire Safeguarding Children Partners or a Community Social Worker, as appropriate, before commencing an investigation or contacting parents. This may mean, on occasions, that the College is unable to conduct its own investigation into such incidents. All such incidents will be recorded using our child protection/safeguarding recording system (CPOMS).

Support for the victims of abuse will be in line with support outlined in the College's Behaviour and Anti-Bullying policies. For victims of sexual abuse, the College will follow advice given by Local Authority Children's Social Care and consider using external agencies, such as Family Help or West Mercia Rape and Sexual Abuse Support Centre to provide additional support and expertise.

Depending on the nature of the abuse, the College may need to consider a risk assessment to protect and support the victim, the alleged perpetrator and other pupils and/or staff in the College. The risk assessment should be recorded and kept under review.

As a boarding school with residential accommodation, we are alert to the potential for abuse resulting from inappropriate pupil relationships, and ensure that our safeguarding protocols comply with The National Minimum Standards for Boarding Schools.

Sexual Violence and Sexual Harassment

Malvern College has zero tolerance of sexual violence and/or sexual harassment; however, such incidents are usually complex and require difficult professional decisions. All decisions and actions are therefore reviewed regularly and policies updated accordingly.

Sexual violence and sexual harassment can occur between two children of any age and sex or through a group of children sexually assaulting or sexually harassing a single child or group of children. Sexual violence and sexual harassment exist on a continuum and may overlap; they can occur online and/or face to face (both physically and verbally) and are never acceptable. We emphasise to staff that downplaying abuse, or the scale of abuse, leads to a dangerous culture in which harmful behaviours can thrive or become normalised. Staff are expected to observe an "it could happen here" approach.

Malvern College will carefully consider any report of sexual violence and/or sexual harassment. The DSL (or Deputy DSL) is likely to have a complete safeguarding picture and is the most appropriate person to advise on the College's initial response. Important considerations will include:

- the wishes of the victim in terms of how they want to proceed. We will support victims to be given as much control as is reasonably possible over decisions regarding how any investigation will be progressed and any support that they will be offered. This will, however, need to be balanced against the College's duty and responsibilities to protect other children and to report potentially criminal incidents to the police;
- the nature of the alleged incident(s), including whether a crime may have been committed and consideration of harmful sexual behaviour;
- the ages of the young people involved;
- the developmental stages of the young people involved;
- any power imbalance between those involved. For example, is the perpetrator(s) significantly older, more mature or more confident? Does the victim have a disability or learning difficulty?

- whether the alleged incident is a one-off or part of a sustained pattern of abuse (eg it could be accompanied by other forms of abuse and a sustained pattern may not be just of a sexual nature)?

In line with KCSiE, we use the term “**victim**” to refer to those who have been subjected to abuse, and the term “**alleged perpetrator(s)**”, and where appropriate “**perpetrator(s)**”, though this term is used with caution as in some cases the abusive behaviour will have been harmful to the perpetrator as well. We also recognise that not every “victim” will view themselves as such, and we will be sensitive to the child’s perception and wishes.

All victims of sexual violence and/or harassment will be reassured that they are being taken seriously, will be supported and kept safe, and all staff are aware of the importance of this. A victim will never be made to feel that they are creating a problem by reporting abuse or be made to feel ashamed. We also recognise that reports may sometimes be indirect and may stem from overheard conversations or observed changes in behaviour that arouse concern.

We are aware that sexual assault can result in a range of health needs and will ensure that pupils experiencing sexual abuse or assault can access specialist NHS support or support from an appropriate sexual abuse referral centre.

Further considerations will include how to manage pupils sharing a classroom or boarding environment, and other ongoing risks to the victim, other pupils or College staff.

Proportionality of response is important, and action taken, including support and sanctions, will be considered on a case-by-case basis and will reflect the guidance in KCSiE 2026 Part 5.

Appropriate professional support will also be provided to the alleged perpetrator (eg signposting to sources of support, information about harmful sexual behaviours etc.).

If a report of sexual violence or sexual harassment is found to be unfounded/unsubstantiated, false or malicious, the DSL, the Director of Pastoral Welfare and the Deputy Head will consider whether the person making the allegation needs support (eg if this is a cry for help) and/or whether disciplinary processes would be appropriate.

Sharing Nudes and Semi-Nudes

This involves the sending or posting of nude or semi-nude images (visual content, such as photographs, videos or livestreams by young people under the age of 18 via, for example, social media or chat apps. (NB The sharing of nudes/semi-nudes of under 18s by adults is child sexual abuse and will be referred immediately to the police.)

Any incident involving the sharing of nudes or semi nudes by pupils must be reported to the DSL, Director of Pastoral Welfare and the Online Safety Officer immediately. The DSL will establish whether the incident is experimental (with no adult involvement or attempt to harm) or aggravated (involving additional or abusive elements), and will respond to the incident in line with DfE and UKCIS Guidance March 2024

(<https://www.gov.uk/government/publications/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people/>) and the College policy on The Acceptable use of ICT and Online Safety. The following practice should be followed:

- Do not view, copy, share, print, store or save the imagery or ask the pupil to do so. (If you have viewed the image(s) accidentally, report this to the DSL and seek support.)

- Do not delete imagery, ask the pupil to delete it or ask the pupil to disclose information about it. This is the DSL's responsibility.
- Do not share the information with other staff, the young person(s) it involves or their or other parents/carers.
- Do not apportion blame/shame to the pupil(s) involved.
- Explain that the incident needs to be reported to the DSL and that support will be available.

The College's approach to responding to such incidents emphasises the protection and education of the pupils concerned, and pupils will always be offered support.

Anti-Bullying

Our policy on anti-bullying is set out in a separate document but we acknowledge that to allow or condone bullying may lead to consideration under child protection procedures. All incidences of bullying, including cyber-bullying, racist, homophobic, biphobic and gender-related bullying, will be dealt with in accordance with our anti-bullying policy. We recognise that children with special needs/disabilities are more susceptible to being bullied.

The DSL maintains a log of bullying incidents in College, through CPOMS.

We recognise that there will be occasions when bullying incidents will fall within child protection procedures or may be deemed criminal activity and that it may be necessary to report the concerns to Worcestershire Safeguarding Children Partners (Family Front Door)/Local Authority Children's Social Care and/or to the Police.

Racist Incidents

Our policy on racist incidents is set out within the Anti-Bullying Policy and acknowledges that repeated racist incidents or a single serious incident may lead to consideration under child protection procedures.

We maintain a log of racist incidents in College through the CPOMS recording system.

Special Educational Needs and Disabilities (SEND)

The College recognises that children with special educational needs (SEN) and disabilities, or certain health conditions, can face additional safeguarding risks and challenges. Specific challenges exist in recognising abuse and neglect in this group of children. These can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration;
- being more prone to peer group isolation than other children;
- the potential for children with SEN and disabilities being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs;
- communication barriers and difficulties in overcoming these barriers.

We will always consider extra pastoral support for children with SEND to address these additional challenges. In addition, the DSL and SENDCo work closely together to ensure appropriate support and packages of care for pupils with SEND.

Online Safety

The DSL understands the risks associated with online activity and, working closely with the Online Safety Co-Ordinator, Emily King, and the Online Safety Officer, Steve Cragg, as well as with the ICT department, has the relevant knowledge and capability to maintain pupils' online safety at school, and ensure appropriate filtering and monitoring on school networks and school devices.

There are potentially 4 areas of risk linked to online safety:

Content: exposure to illegal, inappropriate, or harmful content, for example: pornography, racism, misogyny, self-harm, suicide, antisemitism, radicalisation, extremism, extreme sexual or physical violence, misinformation, disinformation (including fake news) and conspiracy theories.

Contact: being subjected to harmful online interaction with other users or generative AI applications that simulate this; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.

Conduct: online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images, including those generated using AI and online bullying.

Commerce: risks such as online gambling, inappropriate advertising, phishing and/or financial scams.

The DSL recognises the additional risks that children with SEN and disabilities face online, for example from online bullying, grooming and radicalisation and has the capability to support SEND children to stay safe online.

All members of staff are trained in and receive regular updates in online safety and in recognising and reporting concerns. All staff are aware that abuse can take place solely online.

Our Policy on the Acceptable Use of ICT and Online Safety is available on the parent portal and recognises that internet safety is a whole College responsibility (staff, pupils, governors and parents). We understand that many children have unlimited and unrestricted access to the internet via mobile phone networks (eg 4G and 5G). This access means that some children are able to sexually harass, bully and control others via their mobile and smart technology, share nude or semi-nude images consensually and non-consensually (often via large chat groups) and view and share pornography and other harmful content. We carefully consider how to manage this on the College premises and document our processes and procedures in the above policy.

Children and young people may expose themselves to danger, whether knowingly or unknowingly, when using the internet and other technologies. Additionally, some young people may find themselves involved in activities which are inappropriate or illegal (cybercrime). We therefore recognise our responsibility to educate our pupils, teaching them

the appropriate behaviours and critical thinking skills to enable them to remain both safe and legal when using the internet and related technologies., including artificial intelligence. We will ensure that appropriate filters are in place to limit or prevent access to unsuitable sites and we will monitor the use of the College network and internet to ensure that any pupil or staff member attempting to access inappropriate, abusive or harmful material is appropriately advised and/or supported. The leadership team and relevant staff have an awareness and understanding of the provisions in place, know how to manage them effectively and how to escalate concerns. We also consider the age range of pupils, the number of pupils, how often they access the IT systems and the proportionality of response verses safeguarding risks.

Gender Questioning Pupils

Malvern College has issued separate Gender Questioning Children Guidelines, available for staff, pupils and parents on request; this issue is also covered in our Equal Opportunities Policy.

The College is an inclusive learning environment, and should be free from discrimination, harassment and victimisation. We treat all gender questioning children with dignity and respect: staff and governors receive appropriate professional advice and training, and gender questioning pupils will always be given practical and emotional support and guidance, in partnership with the child's parents (unless, in very rare circumstances, involving parents would constitute a risk of harm to the child/young person). We recognise that children questioning their gender may have wider vulnerabilities and children and families will be encouraged to seek appropriate clinical advice and help.

Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)

We know that different forms of harm often overlap, and that perpetrators and alleged perpetrators may subject children and young people to multiple forms of abuse, such as criminal exploitation (including county lines) and sexual exploitation. We recognise that CSE is a form of child sexual abuse. Some specific forms of CCE can include children being manipulated into transporting drugs or money through county lines, shoplifting etc. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence. This exploitation could constitute modern slavery. Further information is available in the Modern Slavery Statutory Guidance 2020.

In some cases, the exploitation or abuse will be in exchange for something the victim needs or wants (for example, money, gifts or affection), and/or will be to the financial benefit or other advantage, such as increased status, of the perpetrator or facilitator. Children can be exploited by adult males or females, as individuals or in groups. They may also be exploited by other children, who themselves may be experiencing exploitation – where this is the case, it is important that the child perpetrator is also recognised as a victim. The experience of girls who are criminally exploited may be very different to that of boys.

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

All staff and governors are made aware of the indicators of sexual exploitation, the fact that

the victim may have been sexually exploited even if the sexual activity appears consensual and that it does not always involve physical contact but can occur through the use of technology. All concerns of CSE are reported immediately to the DSL, who is the College's CSE Lead.

Serious Violence

There are a number of indicators which may signal children are at risk from, or are involved in committing serious violence. These may include: increased absence from school or college, a change in friendships or relationships with older individuals or groups, a significant decline in educational performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation. The likelihood of involvement in serious violence may be increased by factors such as: being male, having been suspended, spent time in Alternative Provision or permanently excluded from school, having experienced child maltreatment, having been involved in offending, such as theft or robbery, having used drugs or alcohol in early adolescence, and having previously been a victim or previously perpetrated violence. We are aware that violence can often peak when pupils are travelling to and from school and can concentrate in particular places. We will consult with pupils, staff and wider partners such as the local police as appropriate to help build understanding of the local context beyond the college.

Domestic Abuse

Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical sexual, financial or emotional abuse. Children can be victims of domestic abuse and/or may engage in child to parent or care giver abuse. They may see, hear or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of these experiences can have a detrimental and long-term impact on their health, well-being, development and ability to learn.

Where we identify that a victim of domestic abuse may be high risk, we will consider a referral for a MARAC (multi-agency risk assessment conference). The purpose of MARAC is to share information and establish a multi-agency action plan to support and protect the victim. The College, through the DSL, will continue to provide help and support to safeguard the children concerned. MARAC does not replace a referral to local authority children's social care.

We will ensure that our pupils understand what a healthy relationship looks like through, for example, the Life Skills curriculum and resources from the [Domestic abuse support | Worcestershire County Council](#). Further information is available from the DSL and Refuge runs the National Domestic Abuse Helpline, which can be called free of charge and in confidence, 24 hours a day on 0808 2000 247.

Operation Encompass

Malvern College receives Operation Encompass notifications. Operation Encompass highlights when a domestic abuse incident has occurred and the police have been called, enabling staff at the College to keep an eye on the child, noting and responding to any changed behaviour.

Children with Family Members in Prison

Children with family members in prison are at risk from poor outcomes resulting from stigma,

isolation and poor mental health. NICCO provides information to support professionals working with offenders and their children, to help mitigate negative consequences for those children. Staff are made aware on a need-to-know basis of pupils with family members who are in, or have been in, prison to ensure the provision of appropriate practical and emotional support.

Female Genital Mutilation (FGM)

With effect from October 2015, all schools are subject to a mandatory reporting requirement in respect of female genital mutilation (FGM). When a teacher suspects or discovers that an act of FGM is going to be or has been carried out on a girl aged under 18, that teacher has a statutory duty to report it directly to the Police.

Failure to report such cases will result in disciplinary sanctions.

The teacher will also discuss the situation with the DSL.

All staff are up to date on the latest advice and guidance provided to assist in addressing specific vulnerabilities and forms of exploitation around;

- Forced Marriage
- FGM
- Honour or Faith-Based Abuse
- Trafficking
- Criminal Exploitation & Gang Affiliation

Our staff will be supported to recognise warning signs and symptoms in relation to each specific issue, and include such issues, in an age-appropriate way, in relevant lesson plans such as Life Skills.

Radicalisation and Extremism (PREVENT)

With effect from 1st July 2015 (updated 2023), all schools are subject to a duty to have “due regard to the need to prevent people from becoming terrorists or supporting terrorism” (section 26, Counter Terrorism and Security Act 2015). This is known as The Prevent Duty.

The current threat from terrorism in the United Kingdom may include the exploitation of vulnerable people, to involve them in terrorism or in activity in support of terrorism. The normalisation of extreme views may also make children and young people vulnerable to future manipulation and exploitation.

Definitions of terrorism, radicalisation and extremism, and indicators of vulnerability to radicalisation, are given in Appendix 4.

Malvern College values freedom of speech and the expression of beliefs and ideology as fundamental rights underpinning our society's values. Pupils and teachers have the right to

speak freely and voice their opinions. However, free speech is not an unqualified privilege; it is subject to laws and policies governing equality, human rights, community safety and community cohesion.

Risk Reduction:

The Safeguarding Governor, Headmaster and the DSL will assess the level of risk within the school and put actions in place to reduce that risk. Risk assessment may include (but is not limited to) consideration of the school's RS, History and Politics curriculums, SEND policy, the use of school premises by external agencies, integration of pupils by gender and SEND, anti-bullying policy and other issues specific to the College's profile, community and philosophy. To this end, open source due diligence checks will be undertaken on all external speakers invited to the College.

We are clear that exploitation and radicalisation must be viewed as a safeguarding concern and that protecting pupils from the risk of radicalisation from any group (including, but not restricted to, those linked to Islamist ideology, to Far Right/Neo-Nazi/White Supremacist ideology, to Domestic Terrorism, INCEL ideology, and to extremist Animal Rights movements) is part of our safeguarding duty.

All staff are alert to changes in a pupil's behaviour or attitudes which could indicate that they are vulnerable to exploitation or radicalisation and/or need help or protection.

College staff are also aware of and vigilant regarding the role of social media in promoting radicalisation and encouraging travel to join proscribed terrorist groups. We are required to identify a Prevent Single Point of Contact (SPOC) who will be the lead within the organisation for safeguarding in relation to protecting individuals from radicalisation and involvement in terrorism: this will normally be the DSL. The DSL and deputies are aware of local procedures for making a Prevent referral. The Prevent SPOC at Malvern College is Mrs Emma Brown.

There are systems in place for safeguarding pupils from extremist material when accessing the internet in College, by using effective filtering, monitoring and usage policies. The College has in place appropriate ICT filters and monitoring systems to enable us to identify and, where appropriate, limit children's exposure to online extremist material. However, we aim to ensure that "overblocking" does not lead to unreasonable restrictions that could compromise learning.

We will use relevant information, tools and resources to help our staff **and parents** recognise and address extremism and radicalisation in young people, for example

<https://educateagainsthate.com/>

Channel:

The school has a duty to cooperate with the Channel programme in the carrying out of its functions, and with the Police in providing information about an individual who is referred to Channel (Section 38, Counter Terrorism and Security Act 2015).

Channel is a voluntary, confidential support programme which focuses on providing support at an early stage to people identified as vulnerable to being drawn into terrorism. Prevent referrals may be passed to a multi-agency Channel Panel for assessment. It is led by the West Midlands Police Counter-Terrorism Unit, and it aims to:

- Establish an effective multi-agency referral and intervention process to identify vulnerable individuals;

- Safeguard individuals who might be susceptible to being drawn into terrorism so that they are not at risk of being drawn into terrorist-related activity;
- and provide early intervention to protect and divert people away from the risks they face and reduce vulnerability.

Further guidance about duties relating to the risk of radicalisation is available in the Advice for Schools from the DfE: [The Prevent duty: safeguarding learners vulnerable to radicalisation - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/the-prevent-duty-safeguarding-learners-vulnerable-to-radicalisation)

An individual will be required to provide their consent before any support delivered through the Channel programme is provided.

Children who are Absent from Education (see the College's CME Policy)

A child who is missing or absent from education, particularly repeatedly and/or for prolonged periods, can be vulnerable to a range of safeguarding risks, including abuse and neglect, which may include sexual abuse or exploitation; child criminal exploitation; mental health problems; substance abuse and other issues. Early intervention is necessary to identify the existence of any underlying safeguarding risks and to help prevent the risk of them going missing in future.

We hold two or more emergency contact numbers for each pupil and our Attendance Officer, Mrs Emily Ireson, working closely with the Director of Pastoral Welfare, who is also the College's Attendance Champion, will adapt attendance monitoring on an individual basis to ensure the safety of each pupil. We will take, and be able to demonstrate that we have taken, reasonable enquiries to ascertain the whereabouts of pupils considered "missing" or absent and will work closely, where appropriate, with the local authority CME Team, School Admissions Service and the Elective Education Team.

The College has a separate Attendance Policy, and work around attendance and pupils missing from education will be coordinated with safeguarding interventions.

The College will notify the Local Authority of any pupil who fails to attend school regularly after making reasonable enquiries or has been absent for a continuous period of 10 days or more.

The College must also notify the Local Authority of any pupil who is to be deleted from the admission register for reasons set out in 'Annex A: Grounds for deleting a pupil from the school admission register' of the DfE statutory guidance 'Children Missing Education' September 2025: [Children missing education: statutory guidance for local authorities and schools - GOV.UK](https://www.gov.uk/government/publications/children-missing-education-statutory-guidance)

Elective Home Education

Where a parent expresses a wish to remove a pupil from school to home educate, we will endeavour to meet with the parent(s) prior to a final decision to ensure that the parents/carers have considered what is in the best interests of the child.

County Lines

County Lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs into one or more importing areas within the UK, using dedicated mobile phone lines or other form of "deal line". Children and vulnerable adults are exploited to move and store drugs and money. Offenders use violence (including sexual), coercion,

intimidation and weapons to ensure the victim's compliance, and can target and recruit children from schools.

Indicators of involvement include missing episodes (from home and school). If a pupil is identified as at risk of exploitation, the DSL will consider completion of a GET SAFE risk assessment (which will be referred to the local authority Children's Services for assessment and support), and or referral to WSCP Family Front Door.

Looked After Children and previously Looked After Children

The most common reason for children becoming looked after is as a result of abuse or neglect. The College will ensure that staff have the necessary skills, knowledge and understanding to keep looked after, and previously looked after, children safe.

Appropriate staff will, where relevant, have information about a child's looked after legal status and contact arrangements with birth parents or those with parental responsibility. They will also have information about the child's care arrangements, if relevant, including the level of authority delegated to the carer by the authority looking after the child. If the College is supporting looked after children on roll, a designated teacher for looked after children and the DSL will have details of the child's social worker and the name and contact details of the Local Authority's Virtual Head for children in care/looked after children and previously looked after children.

Private Fostering Arrangements

Many adults find themselves looking after someone else's child without realising that they may be involved in private fostering. A private fostering arrangement is one that is made privately (without the involvement of local authority Children's Services) for the care of a child under the age of 16 (under 18, if disabled) by someone other than a parent or immediate relative. If the arrangement is to last, or has lasted, for 28 days or more, it is categorised as private fostering.

The Children Act 1989 defines an immediate relative as a grandparent, brother, sister, uncle or aunt (whether of full blood or half blood or by marriage or civil partnership), or a stepparent.

People become involved in private fostering for all kinds of reasons. Examples of private fostering include:

- Children/young people who need alternative care because of parental illness;
- Children/young people whose parents cannot care for them because their work or study involves long or antisocial hours;
- Children/young people sent from abroad to stay with another family, usually to improve their educational opportunities;
- Unaccompanied asylum seeking and refugee children/young people;
- Teenagers who stay with friends (or other non-relatives) because they have fallen out with their parents;
- Children/young people staying with families while attending a school away from their home area.

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

If we become aware of a private fostering arrangement, we will check that Local Authority Children's Social Care have been informed.

Supporting Pupils who have been Abused

We recognise that children who are abused or witness violence may find it difficult to develop a sense of self-worth. They may feel helplessness, humiliation and some sense of blame.

We acknowledge that College may be the only stable, secure and predictable element in the lives of children who have been abused or who are at risk of harm.

We are aware that research shows that at school their behaviour may be challenging and defiant or they may be withdrawn.

The College will endeavour to support all pupils by:

- Encouraging self-esteem and self-assertiveness through the curriculum, as well as promoting respectful relationships, and challenging bullying and humiliating behaviour;
- Promoting a positive, supportive and secure environment, giving pupils a sense of being valued;
- Enforcing a consistently applied College behaviour policy (known as the Promoting Good Behaviour and Discipline Policy) which is aimed at supporting vulnerable pupils. The College will ensure that the pupil knows that some behaviour is unacceptable but that they are valued and not to be blamed for any abuse which has occurred;
- Liaising with other agencies that support the pupil such as Local Authority Children's Social Care Services, Child and Adult Mental Health Service (CAMHS) and those agencies involved in the safeguarding of children;
- Engaging Family Help services, when appropriate;
- Notifying Local Authority Children's Social Care Services (Worcs.Family Front Door) immediately there is a significant concern;
- Providing continuing support to a pupil about whom there have been concerns and who leaves the College by ensuring that appropriate information is forwarded under confidential cover to the pupil's new setting, within 5 days.

Part Three

Information Management

Data Protection, Information Sharing and Confidentiality

We recognise that all matters relating to child protection are confidential, but information sharing is vital in identifying and tackling all forms of abuse.

The Data Compliance Officer is Mr Steve Cragg and the Head of Compliance is Mrs Ria Wilkins.

The school is fully aware of the obligations which the Data Protection Act 2018 and the GDPR places on organisations and individuals to process personal information fairly and lawfully and to keep the information they hold safe and secure. However, the Data Protection Act 2018 UK GDPR and the Data (Use and Access) Act 2025 do not prevent, or limit, the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare and protect the safety of children.

Malvern College staff are proactive in sharing information as early as possible to help identify, assess and respond to risks or concerns about the safety and welfare of our pupils, whether this is when problems are first emerging or where a child is already known to the local authority children's social care. Staff understand that "safeguarding of children and individuals at risk" is a processing condition that allows practitioners to share special category data. This includes sharing information without consent where there is good reason to do so and where the sharing of information will enhance the safeguarding of a child in a timely manner, but it is not possible to gain consent, it cannot be reasonably expected that a practitioner gains consent, or if to gain consent would place a child at risk.

The Headmaster or DSL will disclose any information about a pupil to other members of staff on a need to know basis only. All staff must be aware that they have a professional responsibility to share information with other agencies in order to safeguard children.

All staff must be aware that they cannot promise a child to keep secrets which might compromise the child's safety or well-being, or that of others.

Safeguarding and Child Protection information will be dealt with in a confidential manner. Safeguarding records will be stored securely, separately from academic records. Individual safeguarding files will be kept for each pupil, where relevant: the school will not keep family files. Files will be kept for at least the period during which the pupil is attending the school, and beyond that in line with current data legislation and guidance. Because we use CPOMS and store the majority of our records electronically, we do not hold paper files for all pupils.

We will not disclose to a parent/guardian any information held on a pupil if this could put the pupil at risk of significant harm.

If a pupil moves from the College, Child Protection and Safeguarding records will be forwarded on to the DSL at the new school, with due regard to their confidential nature and in line with current government guidance on the transfer of such records. Direct contact between the two schools may be necessary. We will record where and to whom the records have been passed, and the date.

Communication with Parents

We recognise that good communication with parents is crucial in order to safeguard and promote the welfare of children effectively.

We will always undertake appropriate discussion with parents prior to involvement of another agency unless to do so could place the child or an adult at further risk of harm or would impede a criminal investigation.

We will ensure that parents have an understanding of the responsibilities placed on the College and staff to safeguard children and their duty to co-operate with other agencies in this respect.

Record Keeping

Any member of staff receiving a disclosure of abuse from a child or young person, or noticing signs or symptoms of possible abuse, will make notes as soon as possible (within the hour, if possible), writing down exactly what was said, using the child's own words as far as possible. All notes should be timed, dated and signed, with name printed alongside the signature. Concerns will be recorded using the College's Safeguarding Children recording system (CPOMS).

All records of a child protection nature will be passed to the DSL including case conference minutes and written records of any concerns. Child protection records are kept securely and/or are password protected, with only appropriate persons having access to them.

Child Protection records should include:

- a summary of the concern
- details of how the concern was managed and resolved
- a note of actions taken, decisions reached and the rationale for those decisions, and the outcome.

Any referrals made to other agencies will be copied prior to sending and stored in the pupil's child protection file.

The DSL will maintain and regularly audit the College's child protection records and ensure that each stand-alone Child Protection file includes a chronology of significant events, and that information and contact details are accurate and up to date.

The DSL will transfer the child protection record in a safe and timely manner when a child moves College, ensuring receipt of transfer is obtained.

The DSL may copy child protection records generated by the College prior to transfer and retain for as long as is necessary (normally d.o.b. + 25 years), where there is justification for believing that the records may be required as evidence of the College's involvement with the child for statutory purposes (e.g. court cases or serious case reviews). When the records are no longer required, they will be disposed of securely.

Part Four

Staff Safeguarding Matters

Support and Supervision of Staff

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.

We will support such staff by providing an opportunity to talk through their anxieties with the DSL and to seek further support such as counselling or regular supervision, as appropriate.

Regular supervision will be offered to the DSL and Deputy DSLs, and may be extended to other members of staff as deemed appropriate.

We recognise the importance of practice oversight and multiple perspectives in safeguarding and child protection work. We will support staff by providing opportunities for reflective practice including opportunity to talk through all aspects of safeguarding work within education with the DSL or DDSs and to seek further support as appropriate.

Staff will be made aware of safer working practice guidance and will be given opportunities to develop their understanding of what constitutes safe and unsafe behaviour.

Safer Recruitment and Selection

The College has a written recruitment and selection policy statement and procedures linking explicitly to this policy. The statement is included in all job advertisements, recruitment websites, and candidate information packs.

The recruitment process is robust in seeking to establish the commitment of candidates to support the College's measures to safeguard children and to identify, deter or reject people who might pose a risk of harm to children or are otherwise unsuited to work with them. References are requested, scrutinised and discrepancies followed up. All offers of appointment are conditional until satisfactory completion of mandatory pre-employment checks. Individuals who have lived or worked outside the UK undergo the same checks.

All staff working within our College who have substantial access to children have been checked as to their suitability, including verification of their identity, qualifications and a satisfactory barred list check, enhanced DBS check and a right to work in the UK check.

All teachers working within our College have been checked using the Teacher Services website to ensure they have been awarded QTS, where appropriate, they have completed their teacher induction, where appropriate, and that there are no prohibitions, sanctions or restrictions in place that might prevent them from taking part in certain activities or working in specific positions (e.g. management posts).

Our governors are subject to an enhanced DBS check without barred list check unless they are in Regulated Activity in which case an enhanced DBS check with barred list check will be undertaken.

Any member of staff taking up a management position will be checked to ensure s/he is not

subject to a section 128 direction made by the Secretary of State.

A number of staff, including all members of the Human Resources team, are safer recruitment trained.

The College maintains a single central record of recruitment checks.

Any member of staff working or volunteering in regulated activity prior to receipt of a satisfactory enhanced DBS check will not be left unsupervised and will be subject to a risk assessment. A children's barred list check will also be carried out.

Volunteers who are not working in regulated activity, will be supervised at all times. A risk assessment will be undertaken, if appropriate, to help decide whether or not an enhanced DBS check, without barred list check, is required.

The College seeks written assurance from supply and third-party agencies, alternative providers, initial teacher training providers and contractors that they have undertaken all appropriate checks on any of their staff that work with or have regular contact with our pupils.

Responding to an Allegation against a Member of Staff

The College recognises that there are two levels of allegation/concern which may be made against a member of staff, including supply teachers, volunteers and contractors:

- Allegations that meet the harms threshold and indicate a person would pose a risk of harm;
- Allegations/concerns that do not meet the harm threshold ("low level concerns").

The College has a duty of care towards its employees and as such, it must ensure that effective support is provided for anyone facing an allegation. The College will take action in accordance with part four of Keeping Children Safe in Education 2026 and the College's employment procedures.

This procedure must be used in any case in which it is alleged that a member of staff, Governor/Trustee, visiting professional, volunteer or contractor has:

- Behaved in a way that has harmed a child/young person or may have harmed a child/young person;
- Possibly committed a criminal offence against or related to a child/young person; or
- Behaved towards a child/children in a way that indicates s/he may pose a risk of harm to children/young people.
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children/young people (including behaviour that may have occurred outside school).

Although it is an uncomfortable thought, it needs to be acknowledged that there is the potential for staff in school to abuse pupils. All staff working within our organisation must report any potential safeguarding concerns about an individual's behaviour towards children and young people immediately.

Allegations or concerns about staff, colleagues and visitors must be reported directly to the Headmaster who will liaise with the Local Authority Designated Officer (LADO) Team, who

will decide on any action required. He may also liaise with the DSL. Low level concerns should be reported to the DSL.

Low Level Concerns

The term “low level concern” does not mean that it is insignificant: it is *any* concern that an adult working in or on behalf of Malvern College may have acted in a way that:

- Is inconsistent with our staff code of conduct, including inappropriate conduct outside work and
- Does not meet the harm threshold or is otherwise not serious enough to consider a referral to the LADO (Local Authority Designated Officer).

Examples might include but are not limited to:

- being over friendly with children
- having favourites
- taking photographs of children contrary to school policy
- engaging with a child on a one to one basis for non-academic or pastoral reasons in a secluded area or behind a closed door
- humiliating pupils.

Low level concerns may be reported to the DSL and will be recorded in writing. The record should include details of the concern, the context in which the concern arose, and action taken. The name of the individual sharing their concerns should also be noted but if the individual wishes to remain anonymous, this will be respected as far as reasonably possible. Records will be securely retained and will be reviewed regularly so that potential patterns of concerning behaviour can be identified. Should the level of concern reach the harms threshold the case will be reported to the Headmaster and referred to the LADO.

Staff are also encouraged to feel confident to self-refer if they feel that they have been in a situation which could be misinterpreted as being compromising or if they feel that they may have behaved in a way that falls below the expected standards of professionalism.

Allegations that meet the Harms Threshold

If the concern relates to the Headmaster, it must be reported immediately to the Chair of the College Board, who will liaise with the Designated Officer (LADO) and they will decide on any action required.

The Headmaster (or Chair of College Board) on all such occasions will discuss the content of the allegation with the LADO, prior to undertaking any investigation.

If it is not possible to report to the Headmaster or Chairman of the College Board in the circumstances set out above, a report should be made immediately to the Designated Safeguarding Lead. The Designated Safeguarding Lead will take action in accordance with these procedures and will as soon as possible inform the Headmaster or, where appropriate, the Chairman of the College Board or nominated member of the College Board.

The College will follow the DfE, West Midlands Safeguarding Children and Local Authority procedures for managing allegations against staff, copies of which are available from the DSL. It is important both to look after the welfare of the pupil involved, and to investigate and support the person subject to the allegation.

The parents of the pupil(s) involved will be informed of the allegation as soon as possible or appropriate if they do not already know of it.

Where the LADO advises that a strategy discussion is needed, or that the police or children's social care need to be involved, the case manager will not inform the accused or the parents until these agencies have been consulted and it has been agreed what information can be disclosed.

The reporting restrictions preventing the identification of a teacher who is the subject of such an allegation in certain circumstances will be observed.

Malicious Allegations:

Where an allegation by a pupil is shown to have been deliberately invented or malicious, the Headmaster will consider whether to take disciplinary action in accordance with the College's Promoting Good Behaviour & Discipline Policy.

Where a parent has made a deliberately invented or malicious allegation the Headmaster will consider whether to require that parent to withdraw their child or children from the College on the basis that they have treated the College or a member of staff unreasonably.

Whether or not the person making the allegation is a pupil or a parent (or other member of the public), the College reserves the right to contact the police to determine whether any action might be appropriate.

Whistleblowing

We recognise that children cannot be expected to raise concerns in an environment where staff fail to do so.

All staff should be aware of their duty to raise concerns, where they exist, about the attitude or actions of colleagues using the College's confidential reporting (Whistleblowing) policy.

Whistleblowing concerns about the Headmaster should be raised with the Chair of College Board.

Staff will be made aware that if they feel unable to raise a child protection failure internally, they can contact the NSPCC <https://www.nspcc.org.uk/keeping-children-safe/reporting-abuse/dedicated-helplines/whistleblowing-advice-line/>

Complaints or Concerns expressed by Pupils, Parents, Staff or Volunteers

We recognise that listening to children is an important and essential part of safeguarding them against abuse and neglect. To this end, any expression of dissatisfaction or disquiet in relation to an individual child will be listened to and acted upon in order to safeguard his/her welfare.

We will also seek to ensure that the child or adult who makes a complaint is informed not only about the action the College will take but also the length of time that will be required to resolve the complaint. The College will also endeavour to keep the child or adult regularly informed as to the progress of his/her complaint. The College's complaints procedures are

readily available.

Restrictive Interventions and the Use of Reasonable Force

Our policy on restrictive interventions and the use of reasonable force is set out in our Restrictive Interventions Policy and acknowledges that staff must only ever use physical intervention as a last resort, and that at all times it must be proportionate and involve the minimal force necessary to prevent injury or damage to property.

We understand that physical intervention of a nature that causes injury or distress to a child may be considered under management of allegations or disciplinary procedures.

However, there are circumstances when it is appropriate for staff in school to use a physical intervention to safeguard children and young people. The term 'reasonable force' covers the broad range of actions used by staff that involves a degree of physical contact to control or restrain children/young people. This can range from guiding a child/young person to safety by the arm, to more extreme circumstances such as breaking up a fight or where a child/young person needs to be restrained to prevent violence or injury. "Reasonable" in these circumstances means "using no more force than is necessary for the least amount of time, the application of which will depend upon the circumstances".

Departmental advice for schools is available here:

[Use of reasonable force and other restrictive interventions guidance](#)

Staff who are likely to need to use physical intervention will be appropriately trained.

All incidences of physical intervention will be recorded on the appropriate form in the Restrictive Interventions Policy, in accordance with recommended procedures.

We recognise that touch is appropriate in the context of working with children and all staff have been given 'safe working practice' guidance to ensure they are clear about their professional boundaries. We do not have a 'no contact' policy as this could leave our staff unable to fully support and protect their pupils and students.

We acknowledge that when applying reasonable force in response to risks presented by incidents involving pupils with SEN or disabilities or with medical conditions, it is important to recognise their additional vulnerability and make every effort to reduce the occurrence of challenging behaviour and the need to use reasonable force.

Photography and Use of Images (including hand-held devices)

The welfare and protection of our children is paramount, and consideration should always be given to whether the use of visual content such as photography, videos and livestreams will place our children at risk. Images may be used to harm children, for example as a preliminary to 'grooming' or by displaying them inappropriately on the internet, particularly social networking sites.

For this reason, consent is always sought when photographing children using any means and including iPads, smart phones or cameras and additional consideration given to photographing vulnerable children, particularly Looked After Children or those known to be fleeing domestic violence. Consent for potentially vulnerable pupils will be sought from those

with parental responsibility (this may include the Local Authority in the case of Looked After Children).

Many pupils own or have access to hand-held devices and parents are encouraged to consider measures to keep their children safe when using the internet and social media at home and in the community.

Staff/Pupil Online Communication

The College provides advice and training to staff regarding their personal online activity and has strict rules regarding online contact and electronic communication with pupils. This is contained in the Staff Acceptable Use of ICT Policy. Staff found to be in breach of these rules may be subject to disciplinary action or child protection investigation.

Part Five

Monitoring and Escalation

Challenge and Escalation

We recognise that professional disagreements may arise between any agencies and resolving problems is an integral part of co-operation and joint working to safeguard children.

As part of our responsibility for safeguarding children, we acknowledge that we must be prepared to challenge each other if we feel that responses to concerns, assessments or the way in which plans are implemented are not safeguarding the child and promoting their welfare.

We are aware of the WSCP Escalation Procedures in raising concerns in respect of poor practice and recognise our responsibility to utilise these as and when necessary, in the interests of safeguarding and promoting the welfare of children.

Monitoring and Evaluation

Our Safeguarding Children policy and procedures will be monitored and evaluated by:

- Completion of the annual safeguarding audit/report to the College Board;
- Pupil surveys and questionnaires;
- Discussions with children and staff;
- Scrutiny of data and risk assessments;
- Scrutiny of the College's single central record of recruitment checks;
- Scrutiny of College Board's minutes;
- Monitoring of logs of bullying/racist/behaviour incidents and PPI records;
- Supervision of staff involved in child protection;
- Case file audits undertaken by those College Governors with specific safeguarding responsibility.

The DSL will ensure that the procedures set out in this policy and the implementation of these procedures are updated and reviewed regularly, working with the College Board as necessary. Any child protection incidents at the College will be followed by a review of these procedures by the DSL and a report to the College Board. Where an incident involves a member of staff, the LADO will assist in this review to determine whether any improvements can be made to the College's procedures. Any deficiencies or weaknesses in regard to child protection arrangements at any time will be remedied without delay.

In addition, the College Board will ensure that the DSL will undertake an annual review of this policy. The outcome of the annual review by the DSL will be reported to the College Board and Council who will review the policy and the implementation of its procedures, including good cooperation with local agencies, and consider the proposed amendments to the policy, from both the DSL and its own members, before giving the revised policy its final approval. Detailed minutes recording the review by the College Board will be made.

Part Six

College Safety

Health and Safety

Our Health & Safety policy, set out in a separate document, reflects the consideration we give to the safeguarding of our children both within the College environment and when away from the College, for example when undertaking College trips and visits.

Risk Assessments are undertaken and reviewed regularly including the risk of children being drawn into terrorism or exposed to extremist behaviour.

Safe Environment

The College undertakes appropriate risk assessments and checks in respect of all equipment and of the building and grounds in line with local and national guidance and regulations concerning health and safety.

The College has adequate security arrangements in place in respect of the use of its grounds and buildings by visitors both in and out of College hours.

The College has an electronic sign-in registration system. All visitors must sign in on arrival and sign out on departure and are escorted at all times whilst on College premises by a member of staff or appropriately vetted volunteer. Prospective parents and visitors will also be given a name badge with the title 'Visitor' which must be clearly displayed and worn at all times whilst on the College premises.

Visitors to the College, for example visiting speakers, theatre groups or curriculum specialists, will be appropriately checked and vetted, to ensure they are not linked to extremist groups or promoting extremist or other harmful material.

All visitors to boarding houses must observe the necessity to be kept under sufficient staff supervision during their visit.

Use of College Premises for non-college activities:

Where College facilities/premises are hired or rented out to other organisations, the College Council will seek assurance that the body concerned has appropriate safeguarding and child protection procedures in place and that there are appropriate arrangements for liaison with the College on these issues.

Other Relevant Policies/Appendices

The College Board's statutory responsibility for safeguarding the welfare of children goes beyond basic child protection procedures. The duty is now to ensure that safeguarding permeates all activity and functions. This policy therefore complements and supports a range of other policies, for instance:

- Staff Code of Conduct
- Staff Exclusion for Misconduct Policy
- Complaints Procedure for Parents
- Child-on-Child Abuse Policy
- Promoting Good Behaviour and Discipline Policy
- Anti-Bullying Policy, including cyber-bullying
- Positive Handling Policy
- SEND and Learning Difficulties Policy
- Educational Visits Policy
- First Aid Policy
- Medical care Policy
- Health and Safety Policy
- Relationships and Sex Education Policy
- Managing Images Policy
- Social Media Policy
- Staff Acceptable Use of ICT Policy
- Policy on the Acceptable Use of ICT and Online Safety
- Equal Opportunities
- Whistleblowing (Confidential Reporting)
- Promotion of Democratic (British) Values Policy
- Transgender and Gender Questioning Children Guidelines

The above list is not exhaustive but when undertaking development or planning of any kind the College will need to consider safeguarding matters.

Appendices:

- Appendix 1: Recognition and Identification of Abuse
- Appendix 2: Safeguarding Reporting Form
- Appendix 3: Role of the DSL
- Appendix 4: Radicalisation and Extremism
- Appendix 5: Safeguarding Policy Guidance for TDM Staff



Appendix One - Recognition and Identification of Abuse

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. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects. 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. Children 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 verbal abuse, such as persistent criticism, belittling, or name-calling, as well as 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 from participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing 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 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 penetration with an object) 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. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education and all staff should be aware of it and of their school or college's policy and procedures for dealing with it.

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, for example, 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.

Keeping Children Safe in Education, September 2026

APPENDIX 2 - 2026-2027

FORM 1 - Logging a Concern about a Child's Safety and Welfare – all staff and visitors

Pupil's name:		d.o.b.	Year Group:
Date:		Time:	
Name:			
Print		Signature	
Position:			
Note the reason(s) for recording the incident.			
Details of concern/incident - record the who/what/where/when factually (continue on reverse of sheet if necessary):			
Any other relevant information (witnesses, immediate action taken)			
Action taken			
Reporting staff signature Date			
DSL – Response/Outcome			
DSL signature Date			

Check to make sure your report is clear now - and will also be clear to a stranger reading it next year.

PLEASE PASS THIS FORM TO YOUR DESIGNATED SAFEGUARDING LEAD

Continuation Sheet

Incident /Concern; other relevant information; Action Taken; Outcome

PUPIL NAME:

DATE

DETAILS

Signature



Appendix 3 - The Role of the Designated Safeguarding Lead

In accordance with Annex B of Keeping Children Safe in Education, 2026, the main responsibilities of the DSL at Malvern College are:

Managing Referrals:

The designated safeguarding lead is expected to refer cases:

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

Working with others:

The designated safeguarding lead is expected to:

- act as a source of support, advice and expertise for all staff;
- act as a point of contact with the safeguarding partners;
- liaise with the Headmaster to inform him of issues- especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations. This includes being aware of the requirement for children to be supported by an Appropriate Adult (PACE Code C 2019).
- as required, liaise with the "case manager" and the local authority designated officer(s) (LADO) for child protection concerns in cases which concern a staff member;
- liaise with staff (especially teachers, pastoral support staff, school nurses, IT Technicians, senior mental health leads and special educational needs coordinators (SEND CoS) on matters of safety and safeguarding and welfare (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies so that children's needs are considered holistically;
- liaise with the Mental Health Team, where safeguarding concerns are linked to mental health;
- promote supportive engagement with parents and/or carers in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances;
- work with the Headmaster and relevant strategic leads, taking lead responsibility for promoting educational outcomes by knowing the welfare, safeguarding and child protection issues that children in need are experiencing, or have experienced, and identifying the impact that these issues might be having on children's attendance, engagement and achievement at school or college. This includes ensuring that the school or college knows who its cohort of children who have or have had a social worker are, understands their academic progress and attainment, and maintains a culture of high aspirations for this cohort; and, supports teaching staff to provide additional academic support or reasonable adjustments to help children who have or have had a social worker reach their potential, recognising that even when statutory social care intervention has ended, there is still a lasting impact on children's educational outcomes.

Raising Awareness

The designated safeguarding lead should:

- ensure each member of staff has access to, and understands, the College's safeguarding/child protection policy and procedures, especially new and part-time staff;
- 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 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 school or college in this;
- link with the safeguarding partner arrangements to make sure staff are aware of any training opportunities and the latest local policies on local safeguarding arrangements and
- help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children who have or have had a social worker are experiencing with teachers and school and College leadership staff;
- have an understanding of the filtering and monitoring systems and processes in place, and ensure that all staff understand their responsibilities in relation to these.

The Deputy DSLs will carry out these roles when the DSL is not available.

Training, Knowledge and Skills:

The Designated Safeguarding Lead, and the Deputy Designated Safeguarding Leads have undertaken child protection training and training in inter-agency working, and will attend refresher training at two-yearly intervals in order to:

- understand the assessment process for providing family help and intervention, for example through locally agreed common and shared assessment processes such as family help assessments;
- 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 School's child protection policy and procedures, especially new and part time staff;
- be alert to the specific needs of children in need, those with special educational needs, those with relevant health conditions, and young carers;
- be able to keep detailed, accurate, secure written records of concerns and referrals;
- obtain access to resources and attend any relevant or refresher training courses;
- encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the School may put in place to protect them and to meet the requirements and procedures of the Worcestershire Safeguarding Children Partnership;
- understand the importance of information sharing, both within the College and with the safeguarding partners, other agencies, organisations and practitioners;
- understand the lasting impact that adversity and trauma can have, including on children's behaviour, mental health and well-being, and what is needed in responding to this in promoting educational outcomes;
- 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, with the Online Safety Team, required to keep children safe whilst they are online at school or college;
- can recognise the additional risks that children with special educational needs and disabilities (SEND) face online, for example, from online bullying, grooming and radicalisation and are confident they have the capability to support children with SEND to stay safe online;
- understand relevant data protection legislation and regulations, especially the Data Protection Act 2018, the UK General Data Protection Regulation (UK GDPR) and the Data (Use and Access) Act 2025.

In addition, the DSL will encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, and in any measures the College may put in place to protect them. The DSL will also be aware of and understand the difficulties that children may have in approaching staff about their circumstances and consider how to build trusted relationships which facilitate communication.

The DSL attends Prevent Awareness training as appropriate, and will support the College regarding the prevent duty requirements, providing advice and support to staff on protecting children from risk of radicalisation.

During term time the DSL or Deputy DSL(s) should be available (during College hours) for staff to discuss safeguarding concerns.

Appendix 4 - Radicalisation and Extremism Preventing Radicalisation

Children are vulnerable to extremist ideology and radicalisation. Similar to protecting children from other forms of harms and abuse, protecting children from this risk is part of our safeguarding approach.

- **Extremism** is the promotion or advancement of an ideology based on violence, hatred or intolerance, that aims to: negate or destroy the fundamental rights and freedoms of others; or to undermine, overturn or replace the UK's system of liberal parliamentary democracy and democratic rights; or to intentionally create a permissive environment for others to achieve these results.
- **Radicalisation** refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.
- **Terrorism** is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.
- **What is Prevent?** Prevent is the Government's strategy to stop people becoming terrorists or supporting terrorism, in all its forms. Prevent works at the pre-criminal stage by using early intervention to encourage individuals and communities to challenge extremist and terrorist ideology and behaviour. The Counter-Terrorism and Security Act (2015), places a duty on specified authorities, including schools and colleges, to have due regard to the need to prevent people from being drawn into terrorism ("the Prevent duty").
- **The Prevent duty** reinforces existing duties placed upon educational establishments for keeping children safe.

Educational establishments must

- Ensure a broad and balanced curriculum is in place in schools;
- Assess the risk of pupils being drawn into extremist views;
- Work in partnership with local authorities, police and communities;
- Train staff to provide them with the knowledge and ability to identify pupils at risk;
- Keep pupils safe online, using effective filtering, monitoring and usage policies.

Warning Signs/Indicators of Concern

There is no such thing as a "typical extremist": those who become involved in extremist actions come from a range of backgrounds and experiences, and most individuals, even those who hold radical views, do not become involved in violent extremist activity. Pupils may become susceptible to radicalisation through a range of social, personal and environmental factors. It is vital that school staff are able to recognise those vulnerabilities. However, this list is not exhaustive, nor does it mean that all young people experiencing the above are at risk of radicalisation for the purposes of violent extremism.

Factors which may make pupils more vulnerable may include:

- **Identity Crisis:** the pupil is distanced from their cultural/religious heritage and experiences discomfort about their place in society.
- **Personal Crisis:** the pupil may be experiencing family tensions; a sense of isolation; low self-esteem; they may have dissociated from their existing friendship group and become involved

with a new and different group of friends; they may be searching for answers to questions about identity, faith and belonging.

- Personal Circumstances: migration; local community tensions and events affecting the pupil's country or region of origin may contribute to a sense of grievance that is triggered by personal experience of racism or discrimination or aspects of Government policy.
- Unmet Aspirations: the pupil may have perceptions of injustice; a feeling of failure; rejection of civic life.
- Experiences of Criminality: involvement with criminal groups, imprisonment, poor resettlement or reintegration.
- Special Educational Need: pupils may experience difficulties with social interaction, empathy with others, understanding the consequences of their actions and awareness of the motivations of others.

Pupils who are vulnerable to radicalisation may also be experiencing:

- Substance and alcohol misuse
- Pressure
- Influence from older people or via the Internet
- Bullying
- Domestic Abuse
- Race/hate crime

Behaviours which may indicate a child is at risk of being radicalised or exposed to extremist views could include:

- Being in contact with extremist recruiters and/or spending increasing time in the company of other suspected extremists;
- Loss of interest in other friends and activities not associated with the extremist ideology, group or cause;
- Pupils accessing extremist material online, including through social networking sites;
- Possessing or accessing materials or symbols associated with an extremist cause;
- Using extremist narratives and a global ideology to explain personal disadvantage;
- Pupils voicing opinions drawn from extremist ideologies and narratives, this may include justifying the use of violence to solve societal issues;
- Graffiti symbols, writing or art work promoting extremist messages or images;
- Significant changes to appearance and/or behaviour increasingly centred on an extremist ideology, group or cause;
- Changing their style of dress or personal appearance to accord with the group;
- Attempts to recruit others to the group/cause;
- Using insulting to derogatory names for another group;
- Increase in prejudice-related incidents committed by that person – these may include: - physical or verbal assault, provocative behaviour, damage to property, derogatory name calling, possession of prejudice-related materials, prejudice related ridicule or name calling, inappropriate forms of address, refusal to co-operate, attempts to recruit to prejudice-related organisations, condoning or supporting violence towards others, Parental reports of changes in behaviour, friendship or actions and requests for assistance, Partner schools, local authority services, and police reports of issues affecting pupils in other schools.

Referral Process

Referral Process All concerns about young people vulnerable to radicalisation should be referred to the DSL in the first instance. The DSL will follow safeguarding procedures which could include:

- Talking to the young person about their behaviour/views/on-line activity/friends etc.;
- Discussion with parents/carers about the concerns;
- Checking out on-line activity, including social media if possible;
- Providing in-house support, if available;
- Providing Family Help targeted support if necessary.
- Referral to the Channel programme.

The Channel Programme

Channel is a voluntary, confidential support programme which focuses on providing support at an early stage to people who are identified as being susceptible to being drawn into terrorism. Prevent referrals are assessed and may be passed to a multiagency Channel panel, which will discuss the individual referred to determine whether they are at risk of being drawn into terrorism and consider the appropriate support required. A representative from the school or college may be asked to attend the Channel panel to help with this assessment. **An individual will be required to provide their consent before any support delivered through the programme is provided.**

Appendix 5: Safeguarding Policy Guidance for TDM staff

Visiting or Working at Malvern College

2026-27

Malvern College is committed to the highest standards of safeguarding for the pupils entrusted to our care. This appendix is designed to ensure that staff from The Downs, Malvern (TDM) who are visiting or working at Malvern College, College Road, understand their safeguarding responsibilities, the College's safeguarding processes and procedures and their role in responding to and reporting any safeguarding concerns.

All staff from TDM who regularly visit or work on the Malvern College site are required to read the Malvern College Safeguarding Policy (available on our website or from the DSL) and this Appendix, which provides key information for staff working on both sites.

If any member of TDM staff visiting Malvern College has a safeguarding concern, they should contact the DSL or a member of the Safeguarding Team, as soon as possible.

Malvern College DSL: Emma Brown 01684 581609 emma.brown@malverncollege.org.uk and safeguarding @malverncollege.org.uk (this is a shared mailbox which is also accessed by the Deputy DSLs).

Deputy DSLs:

Hannah Clarke 01684 581685 hannah.clarke@malverncollege.org.uk

Mark Hardinges mark.hardinges@malverncollege.org.uk

Vanessa Young (Director of Pastoral Welfare) 01684 581642 Vanessa.young@malverncollege.org.uk

Emily King (Online Safety Co-Ordinator) emily.king@malverncollege.org.uk

Lewis Faulkner (Deputy Head) lewis.faulkner@malverncollege.org.uk

Penny Bijl penny.bijl@malverncollege.org.uk

Staff can also request a Safeguarding Reporting Form from Reception; once completed, this should be given to the receptionist, who will ensure that it reaches the DSL or a Deputy DSL before the end of the working day. The form should be signed and dated by the reporting member of staff.

The Malvern College DSL (or a Deputy DSL) will add any relevant information to the child's CPOMS record, noting by whom the concern was raised and ensuring that, if appropriate, the Housem. and/or parents are made aware.

If the concern involves a child at risk of immediate harm, or is otherwise a safeguarding situation requiring immediate action, the TDM staff member should go to the Malvern College Reception office and ask to see the DSL, Headmaster or a member of the Safeguarding team immediately. If the situation or incident has arisen after 5pm and/or if Reception is closed, the College Medical Centre (01684 581535) can provide emergency on-call contact numbers and may be able to support/advise. It may also be appropriate to call 999 or the Worcestershire County Council Children's Services out of hours number: 01905 768020.

If a member of TDM staff is concerned about the behaviour of a member of Malvern College staff and believes their behaviour to be putting a child or another member of staff at risk, they should contact the Headmaster, Keith Metcalfe, directly keith.metcalfe@malverncollege.org.uk . If they have

concerns about the Headmaster, information should be shared with the Chair of the College Council (see below). Additional details re process and procedure can be found in the Malvern College Safeguarding Policy.

If the concern about a member of Malvern College staff is **a Low Level Concern** (i.e. any concern that they or another member of staff may have acted in a way that is inconsistent with the Code of Conduct, but does not otherwise meet the harms threshold set out in KCSiE), the TDM member of staff should contact the DSL, Mrs Emma Brown, as soon as possible.

Additional Guidance:

Appropriate relationships with children and young people should be based on mutual trust and respect, Children and young people are often spontaneously affectionate and tactile and it is important not to alienate them through lack of response or by appearing to reject this. You should, however, avoid touching pupils: please do not initiate physical contact. If you are working with a pupil on his/her own always ensure that the door is left open and/or that you can be visible to others. Do not photograph pupils, exchange emails or text messages, or give out your own personal contact details. Any unprofessional contact with pupils, eg through a social networking site, may leave you vulnerable to an allegation of abuse being made against you. Please see the Malvern College Safeguarding Policy and the Staff Code of Conduct for further details.

Additional Contact Information:

Malvern College Safeguarding Governor – Andy Collins operationsoffice@malverncollege.org.uk

Chair of College Council – Jonathan Penrice

Worcestershire LADO - 01905 846221

Appendix 6: Safeguarding Children and Young People for Summer School, Preparatory Courses delivered in partnership with Malvern College, MCEL Commercial Activities, and Third-Party Residential Lettings

This Appendix applies at any time when Malvern College is operating outside of term time and where:

- Malvern College term time pupils are not in residence, and
- The site is being used for MCEL-led activities or third-party residential lettings involving children or young people.

This includes, but is not limited to:

- School holiday periods (Half Terms, Easter and Summer holidays)
- Any additional periods where the College site is used for commercial or externally delivered activities involving children e.g. evenings or weekends.

Activation and Communication

Prior to any period during which this Appendix is in operation:

- Key safeguarding arrangements (including DSL cover and reporting routes) will be clearly communicated.

Third-party providers will be reminded of their safeguarding responsibilities and reporting expectations. The Malvern College Safeguarding Policy applies to the management of MCEL and third-party activities involving children and young people at Malvern College/on the Malvern College site, including any off-site activities/trips. There are two key areas of difference. These are:

- (i) The roles and responsibilities of staff who undertake the roles of Designated Safeguarding Lead/Deputy Designated Safeguarding Lead outside of term time (with oversight from the Malvern College Safeguarding Team)
- (ii) Management of the filtering and monitoring of devices used by children who are on our site for a short period of time; see section on filtering and monitoring.

Every child/young person should feel safe and protected from any form of abuse and maltreatment which could impair their mental and/or physical health or development. In the policy, this means any kind of physical, emotional or sexual abuse or ill-treatment, or neglect.

There are a wide range of adults to whom pupils can turn for help. These include Group Leaders, Houseparents, the Summer School Director, activity leaders, pastoral staff and the Designated Safeguarding Lead(s).

When performing safeguarding duties and when responding to safeguarding situations, the MCEL staff will consider at all times what is in the best interests of the child.

Key Safeguarding Staff

The key safeguarding staff for MCEL Activities are:

Luke McCluskey and Caroline Buchanan.

There is a safeguarding telephone: 07525 594509 which will be held by the nominated representative.

This appendix applies to:

- All employees and stakeholders of Malvern College Enterprises Ltd (MCEL)
- All young people under 18 attending Summer School and Partnership Programmes and Third Party Lets
- Young people aged 18 and over attending MCEL activities for children and young people, recognising that safeguarding responsibilities differ and the focus is on general welfare (unless the individual is deemed vulnerable)
- Anyone coming into contact with MCEL children/young people or visiting the College site.

All MCEL staff must read this document and the Malvern College Safeguarding Policy, and sign to say they agree to work to it. Visitors (eg visiting speakers) and contractors must also comply with it.

Third party providers must have completed the Safeguarding and Event Due Diligence Questionnaire and confirm in writing that:

- All staff have appropriate DBS checks
- Safer recruitment procedures have been followed
- Staff have received safeguarding training appropriate to their role
- Online safety has been considered in their policies and procedures.

MCEL Staff Safeguarding Training

All MCEL Summer School and Partnership Programme staff are DBS checked and will receive induction training before the course commences.

All MCEL permanent staff will receive training annually.

All temporary/seasonal staff must receive safeguarding induction training.

Training will include: vigilance in recognising and responding to need arising from child protection concerns and young people's mental health needs.

Staff will have access to a copy of the Malvern College Safeguarding Policy. There will be a briefing before a

course starts where they will be issued with a Professional Curiosity QR Code and the safeguarding contacts.

The Role of the MCEL DSL

The MCEL DSL will have day to day responsibility for all matters relating to safeguarding. However, a Malvern College DSL or Deputy DSL will be contactable for oversight and appropriate support. **In the event of a serious safeguarding incident, escalation to the Malvern College DSL is mandatory.**

The MCEL DSL is responsible for:

- ensuring that all staff understand and are able to discharge their roles and responsibilities as set out in Part One of Keeping Children Safe in Education;
- undertaking, in conjunction with the Headmaster and Safeguarding Governor, an annual audit of safeguarding procedures;
- managing safeguarding referrals to external agencies, in conjunction with the Malvern College DSL where appropriate;
- making use of the Levels of Need guidance when making a decision about whether the threshold for Family Help or Social Care intervention is met;
- keeping secure records of concerns about children, including the use of body maps, even where there is no need to refer the matter immediately;
- developing effective links with relevant agencies and other professionals, and co-operating as required with their enquiries regarding safeguarding matters including co-operation with serious case reviews, attendance at strategy meetings, initial and review child protection conferences, core group and “child in need” review meetings;
- liaising with Malvern College DSL when making a decision about reporting an incident or, very rarely (given the short-term and temporary nature of the young person’s stay with MCEL) making a referral to an external agency;
- acting as a source of support, advice and expertise for MCEL staff;
- working with the Malvern College DSL to provide training to ensure that all staff understand and are able to discharge their roles and responsibilities as set out in Part One of Keeping Children Safe in Education;
- acting as the first and primary contact for any safeguarding concern on any Malvern College proprietary course/festival
- acting as the primary contact for any safeguarding concern referred to MCEL from a DSL from a residential group/third party letting);

- ensuring that all third party residential events involving young persons under 18 have submitted their safeguarding policy, named their DSL (name, mobile number, email and relevant qualification), and provided their risk assessment;
- ensuring that this information is recorded and accessible to relevant staff members on duty;
- taking responsibility for the assessment, recording and reporting of any safeguarding referral by a child, a staff member, parent, other DSL, or member of the public;
- taking responsibility for any decision to request the removal of a child from an event due to safeguarding concerns either for the child or other members of the course;
- helping to promote educational outcomes by sharing with teachers and senior members of the MCSS staff, where appropriate, information about the welfare, safeguarding and child protection issues that pupils are experiencing or have experienced.
- Liaising with Steve Cragg, Head of ICT and trained Deputy DSL regarding any online safety concerns that arise.

Any steps taken to support a pupil who has a safeguarding vulnerability must be reported to the DSL or deputies.

Staff will be informed of relevant details regarding a safeguarding incident or circumstances when the DSL feels that their having knowledge of a situation will improve their ability to support an individual pupil or family.

Allegations against staff:

Low level concerns should be reported to the named DSL/DDSL on site or on call.

Any allegation against an MCEL or third-party staff member which meets the harm threshold must be reported immediately to the Headmaster and managed in line with LADO procedures. If the allegation is against the Headmaster, it must be reported to the Chair of College Council.

Missing child

Any missing child incident must be reported immediately to the MCEL DSL and escalated in line with College procedures, including police involvement where appropriate.

Filtering and Monitoring (Online Safety)

Wi-Fi Access & Safeguarding Measures

- **Under 18 Wi-Fi**
 - A dedicated network is provided for students.

- This network includes content filtering to block access to inappropriate or harmful websites.
- Access is automatically disabled between 22:00 and 07:00 to support healthy routines and safeguarding.
- **Staff / Adult / Leaders Wi-Fi**
 - A separate network is available for staff and authorised adults.
 - This network is accessible 24 hours a day.
- **Monitoring & Transparency**
 - Notices are clearly displayed in Houses and public areas informing users of acceptable use expectations and that use of the Wi-Fi **constitutes acceptance of these conditions.**

For Malvern College groups, the hours of use and access to on-line equipment is supervised and restricted, and there is no overnight access to Wi-Fi or devices. All the internet free time will take place in Common Areas.

For Third Party Groups: Malvern College / MCEL will share information about normal practice and alert groups to their responsibilities in relation to online safety. Malvern College/MCEL will recommend that groups adhere to Malvern College practices in relation to student access to devices.

Staff should report any concerns relating to online safety to the MCEL DSL.

Information Management and Record Keeping

Data Protection, Information Sharing and Confidentiality:

We recognise that all matters relating to child protection are confidential, but information sharing is vital in identifying and tackling all forms of abuse.

The Data Compliance Officer is Mr Steve Cragg.

MCEL is fully aware of the obligations which the Data Protection Act 2018 and the GDPR places on organisations and individuals to process personal information fairly and lawfully and to keep the information they hold safe and secure. However, the Data Protection Act 2018 and GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare and protect the safety of children. We are therefore proactive in sharing information as early as possible to help identify, assess and respond to risks or concerns about the safety and welfare of young people in our care.

All staff must be aware that they cannot promise a child to keep secrets which might compromise the child's safety or well-being, or that of others.

Staff working for third-party groups are expected to report day-to-day, safeguarding and child protection concerns to their own DSLs. The third-party DSLs **must** report any safeguarding or child protection concerns which might involve reporting to external agencies to the MCEL DSL. This includes but is not limited to the police, children's services, the LADO and RIDDOR reportable accidents etc. These should be reported as soon as possible, ideally on the same day and always within 24 hours.

Safeguarding and Child Protection incidents will be recorded and logged by the MCEL DSL, and information will be dealt with in a confidential manner.

Records should include:

- a summary of the concern
- details of how the concern was managed and resolved, including a timeline
- a note of actions taken, decisions reached and the rationale for those decisions, and the outcome.

Once the child or young person has left the MCEL course or event, any safeguarding records will be stored securely by the DSL or transferred securely to the appropriate body, which may be the child's school, the police, Children's Services or relevant medical services, in discussion with the Malvern College DSL.

Good communication with parents is crucial in order to safeguard and promote the welfare of children effectively. Appropriate discussion will always be undertaken with parents regarding a safeguarding concern and prior to involvement of another agency unless to do so could place the child or an adult at further risk of harm or would impede a criminal investigation. We will not disclose to a parent/guardian any information held on a pupil if this could put the pupil at risk of significant harm.

Additional safeguarding provisions

Child-on-child abuse

Child-on-child abuse is taken seriously and managed in line with the Malvern College Safeguarding Policy.

Whistleblowing

All staff must be aware of whistleblowing procedures and may raise concerns without fear of detriment.

Supervision & ratios

Appropriate staff-to-student ratios must be maintained at all times, particularly in boarding and activity settings.

Site controls

Third-party groups must adhere to College access, supervision and zoning requirements to ensure safeguarding separation where required.

Adults on Site and Safer Working Practices

The College recognises that, during MCEL activities and third-party residential lettings, a wide range of adults may be present on site, including third-party staff, contractors, visiting professionals, parents and spectators.

Safeguarding expectations

- All adults on site are expected to:
 - Behave in accordance with **appropriate professional and safeguarding standards**
 - Avoid **unsupervised or inappropriate contact with children**
 - Follow all **College safeguarding, supervision and access protocols**.

Third-party staff and group leaders

- Must:
 - Be **appropriately vetted (including DBS or equivalent)**
 - Be **clearly identifiable** (e.g. ID badges)
 - Remain responsible for the supervision of their group at all times.
- **Must not delegate supervision to MCEL staff unless formally agreed**

Visitors, spectators and parents

- Must:
 - Be **restricted to designated areas**
 - Not have access to **boarding houses or accommodation areas**
 - Not engage in **unsupervised contact with children**.

Contractors and external professionals

- Must:
 - Follow College **contractor safeguarding procedures**
 - Be supervised where appropriate
 - Wear identification at all times.

Access to accommodation / boarding areas

- Access is restricted to:
 - Authorised staff
 - Registered group leaders.
- **No unauthorised adult may enter pupil accommodation areas**

Reporting concerns about adults

- Any concerns regarding the behaviour of an adult on site must be:
 - Reported immediately to the MCEL DSL
 - Managed in line with **allegations against staff procedures**.

Pre-Operation Safeguarding Checks

Prior to the start of any period in which this Annex applies, the MCEL DSL will ensure that:

- DSL/DDSL cover is clearly defined
- Third-party safeguarding documentation has been received and reviewed, where appropriate
- Staffing, supervision and site access arrangements are confirmed
- Communication has been issued to all relevant staff.