

Westminster Tutors



**Safeguarding and Child
Protection Policy**

2024-2025

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1. Policy Statement

- 1.1 We have a whole college approach to safeguarding, the golden thread running throughout every aspect of the college. All our college policies support this policy.

2. Definitions

- 2.1 Definition of safeguarding from KCSIE (currently in force): this is defined as providing help and support to meet the needs of children/young adults as soon as problems emerge; protecting children from maltreatment, inside or outside the home, including online; preventing impairment of children's/young adults' health or development; ensuring that children/young adults grow up in circumstances consistent with the provision of safe and effective care; and taking action to enable all children/young adults to have the best outcomes. Children include everyone under the age of 18.
- 2.2 The Difference between Safeguarding and Child Protection: safeguarding is a broader term than child protection. It encompasses all the elements set out above and is what a college must do for all children/young adults.
- 2.3 Child Protection is part of this definition and refers to activities undertaken to protect children/young adults who have been harmed or are at significant risk of being harmed. Where a child/young person is thought to be suffering significant harm or at risk of suffering significant harm, this must be reported to MASH immediately. Action must also be taken to promote the welfare of children/ young adults who are believed to need additional support, even if they are not suffering harm or at immediate risk. Such instances must be addressed through the local inter-agency assessment processes.
- 2.4 We differentiate between 'children at risk' who have suffered or are likely to suffer significant harm and 'children in need of additional support from one or more external agencies' inclusive of 'Early Help Assessment'. The DSL must immediately report such circumstances to the Children's Social Care Multi-Agency Safeguarding Hub (MASH).
- 2.5 Exploitation is also a form of child/young adult maltreatment and includes child criminal exploitation (CCE) and child sexual exploitation (CSE).

3. Guiding Principles

- 3.1 Safeguarding is everyone's responsibility. All who work, volunteer or supply services to our college have an equal responsibility to understand and implement this policy and its procedures both within and outside of normal college hours, including activities away from college. All employees and volunteers are required to sign that they have read, understood and will abide by our 'Child Protection Policy', 'Keeping Children Safe in Education (KCSIE) (DfE: September 2024) part one', and for those who work directly with young adults, 'KCSIE Annex A' along with our Safe Recruitment

Policy, Whistleblowing Policy, Staff Behaviour policy (Staff Code of Conduct) and The Teachers' Standards.

- 3.2 Everyone who comes into contact with children/young adults and their families and carers has a role to play in safeguarding children/young adults. To fulfil this responsibility effectively, all professionals should ensure their approach is student-centred. This means that they should consider, at all times, what is in the best interests of the child/young adult.
- 3.3 The college recognises that effective child protection work requires good inter-agency cooperation and a competent and confident workforce in responding to child protection situations. This policy fully considers the child protection procedures agreed by [Kensington and Chelsea, and Westminster Safeguarding Children Partnership](#) and statutory guidance [Working Together to Safeguard Children \(WtSC\)](#). Our approach at the College is student-centred.
- 3.4 Our procedures regarding young adults missing from education and Students being withdrawn from College comply with [London Safeguarding Children Procedures Guidance](#) and with [KCSIE](#) (currently in force): if a student is withdrawn from the college, all efforts will be made to identify the college to which the student is being admitted; their confidential educational and student protection records will be sent separately. For those students under the age of 18 or those with an EHCP, the parent/guardian/carer fails to provide information regarding the new college, an urgent referral will be made to the [Education Welfare Service \(EWS\)](#), unless the College has safeguarding concerns about the child in which case it will be via the [MASH](#).
- 3.5 This policy is amended in accordance with the Safeguarding Arrangements set out by the [London Safeguarding Children Partnership \(LSCP\)](#). Our DSL is also provided with external supervision and can directly access advice as required without first referring to the Governance Advisory Board. This enables there to be a separation between the DSL and the Governance Advisory Board.
- 3.6 We recognise that vigilance in online safety is vital for ensuring that our approach to safeguarding is successful. Therefore, this policy should be read and understood in conjunction with our Online Safety Policy. The internet and technology are increasingly essential tools for learning and socialising, and so our approach to online safety is designed to enable the College to make the most of these hugely valuable resources while preventing the risks associated with them and mitigating negative effects.

4. Safeguarding Oversight

- 4.1 The College has a Governance Advisory Board appointed by, and accountable to, the proprietor rather than a governing body. The proprietor has ensured that a member of the senior leadership team, appointed as designated safeguarding lead (DSL), is able to discharge that role with sufficient independence. This is particularly in relation to any allegations involving the proprietor or members of the proprietor's family.

- 4.2 The written confirmation of the appointment as DSL states that part of the duties of the post involves contacting the Local Authority Designated Officer (LADO) on any matter that the DSL considers cannot be properly dealt with internally.

Our DSL is also provided with external supervision and can directly access the external supervisor without first referring to the proprietor. This enables there to be a separation between the DSL and the proprietor

5. The Main Elements of Our Safeguarding Policy

- 5.1 The three main elements to our college's safeguarding policy are:

Prevention:

- 5.2 We safeguard young adults whether they are at risk of maltreatment or abuse or in need of specific local authority or inter- agency care.
- 5.3 Our Safe Recruitment procedures include checking and recording the suitability of staff and volunteers developing procedures to deal with safeguarding issues which may be specific to individual young adults in our college and local area.
- 5.4 We work with other agencies to reduce risks.
- 5.5 The college seeks to promote the welfare of students at all times.
- 5.6 Staff must be alert to situations where students appear to be unhappy or where there are marked changes in behaviour.
- 5.7 The aim will be to 'listen' to students through the provision of early help, either through the college or through young adults' services under 'child in need' provision.

Protection:

- 5.8 Staff are trained and supported to respond appropriately and sensitively to all safeguarding concerns following our agreed procedures.
- 5.9 We identify and act on early signs of abuse, neglect, or exploitation and reassess concerns when situations do not improve to ensure the right help at the right time to address risks and prevent risks from escalating.
- 5.10 We ensure that allegations, concerns, suspicions and complaints against staff are dealt with promptly, and in accordance with DfE and local guidance.
- 5.11 We keep accurate records and share relevant information quickly in order to challenge inactivity.

5.12 Additionally, we take all practical and appropriate steps to ensure that our college premises are as secure as circumstances permit.

Support:

5.13 We support young adults who may have been at risk of significant harm (which includes the way staff respond to their concerns and any work that may be required) or young adults who have been abused, in accordance with their agreed child protection plan.

5.14 We seek to address both the mental and emotional welfare of young adults and families through; the provision of individual mentoring, providing a positive and safe college environment, careful and vigilant tutoring, accessible pastoral care, good adult role models, and by promoting full co-operation with and contributions to the provision of appropriate coordinated support and/or early help from external agencies.

5.15 Additionally, we operate robust and sensible health and safety procedures and along with clear and supportive policies on drug, alcohol and substance misuse.

5.16 We recognise that young adults have a right to feel secure and cannot learn effectively unless they do so.

5.17 Any adult can harm a young adult either by direct acts or failure to provide proper care, or both. This may be through neglect, emotional, physical or sexual abuse or a combination of such types.

5.18 Our young adults have the right to respect and protection from maltreatment. They have the right to feel valued and confident, knowing how to approach adults if they are in difficulty.

5.19 The college treats incidents of bullying as a child protection concern when there is reasonable cause to suspect that a young adult is suffering, or likely to suffer, significant harm.

5.20 Our Safeguarding Child Protection Policy is also dove-tailed with the Behaviour Management Policy and Anti-Bullying Policy. The DSL and Deputy DDSL are the appointed officers to manage incidents of bullying.

5.21 Whilst the college will work openly with parents/carers/guardians as far as possible, the college reserves the right to contact MASH or the police, without notifying parents/carers/guardians, if this is in the young adult's best interests.

5.22 In preparing this policy, we have been attentive to the nature, age range and other significant features of the college in the provisions made for safeguarding.

5.23 In the college with the age range of our students, we are aware of the potential scope for problems relating to emotional health issues, body image, eating disorders, self-harm, and also radicalisation and extremism.

- 5.24 This policy provides staff, volunteers, Principal and Proprietor with the guidance they need in order to keep young adults safe and secure in college and informs parents/carers/guardians how we will safeguard their young adults whilst they are in our care. The college promotes safe practice and professional conduct to safeguard young adults and to mitigate against the potential for misunderstandings or situations being misconstrued so staff are not vulnerable to allegations. Our Staff maintains an attitude of 'it could happen here' as far as safeguarding is concerned. We understand the importance of young adults receiving the right help at the right time to address risks and prevent issues escalating.

6. Roles and Responsibilities

- 6.1 Main Responsibilities of the DSL: the Proprietor ensures that a member of the Senior Leadership Team, is appointed to the role of the DSL and has the appropriate status and authority within the college to carry out the duties of the post. The DSL takes lead responsibility for safeguarding and child protection (including online safety and understanding the filtering and monitoring systems and processes in place in accordance with DfE guidance), and this is explicit in the role holder's job description. The DSL has the additional time, funding, training, resources and support to carry out the role effectively. A detailed list of responsibilities for the DSL/Deputy DSL is given in KCSIE: currently in force and also in Appendix 3 below.

All Staff And Volunteers:

- 6.2 Safeguarding is everyone's responsibility. It applies to all who work, or volunteer, or learn, or supply services to our college.
- 6.3 All staff and volunteers have an equal responsibility to understand and implement this policy and its procedures both within and outside of normal college hours including activities away from college. This includes a duty to act upon any suspicion, concern or disclosure that may suggest that a student is at risk of significant harm or in need of support services.
- 6.4 All staff and volunteers should be alert to students at risk of being radicalised or drawn into extremism or child sexual exploitation whether from an adult or another student.
- 6.5 Staff and volunteers are required to report instances of actual or suspected child abuse or neglect to the DSL or Deputy DSL. Additionally, they are expected to make themselves available for appropriate training and to read and understand both this policy and Part 1 of the latest edition of KCSIE along with 'What to do if you are worried a student is being abused' latest edition.
- 6.6 Special arrangements will be put in place if anyone working in the college whose command of English is insufficient to enable them to read and digest the contents of this policy and Part 1 of KCSIE.

Visitors and visiting speakers

- 6.7 Appropriate safeguarding and prevent duty checks upon visiting speakers and other visitors will be made and recorded.
- 6.8 All visitors and visiting speakers will be required to undergo an identity check on arrival and wear a visitor's badge. They will not be allowed unsupervised access to students.
- 6.9 The college keeps a digital visitor's book at Reception.
- 6.10 All visitors must sign in on arrival and sign out on departure and are escorted whilst on college premises by a member of staff or appropriately vetted volunteer.
- 6.11 Unidentified visitors will be challenged by staff or reported to the Principal or college Office.
- 6.12 We have protocols for ensuring that any visiting speakers, who might fall within the scope of the Prevent duty, whether invited by staff or by the students themselves, are suitable and appropriately supervised.
- 6.13 This will if appropriate include a barred list check and internet search.
- 6.13 At the college, speakers are never left alone with students.
- 6.14 The interaction between the Prevent requirement to check speakers and the KCSIE (Currently in force) is likely to mean in practice that checks on visiting speakers will be recordable on the SCR either as checks on staff or un-prescribed checks on volunteers.
- 6.15 In accordance with the ISSR, checks are recorded in the SCR by reference to the usual considerations such as role, frequency, supervision, payment and employment by another organisation.

Safeguarding Arrangements For Staff Employed By Another Organisation

- 6.16 We ensure procedures are followed to enable appropriate student protection (including DBS checks) and are applied to staff employed by other organisations in contact with the college (including obtaining written confirmation that DBS checks have been completed) students including working on another site (please see policy on Educational Visits).
- 6.17 The College will obtain DBS checks on contractor staff, who also receive safeguarding training from the DSL.
- 6.18 In no circumstances will the college decide to cease to use a supply teacher due to safeguarding concerns, without finding out the facts and liaising with the Local Authority designated officer (LADO) to determine a suitable outcome.

- 6.19 The Governance Advisory Board will discuss with the supply agency whether it is appropriate to suspend the supply teacher subject to an allegation or concern, or redeploy them to another part of the college, whilst an investigation is carried out.
- 6.20 The College, in co-operation with the LADO, police and/or social services and the supply agency, will usually take the lead on an investigation of this nature.

7. Key Contacts

Internal Contacts

- 7.1 Our College's Designated Safeguarding Lead (DSL) and Deputy Designated Safeguarding Lead (DDSL), who are members of the Senior Leadership Team (SLT), will also assist the Prevent Officer responsible for the prevention of radicalisation, extremism and being drawn into terrorism. Their telephone numbers are prominently displayed at the college. Their contact details are:

Designated Safeguarding Lead and Prevent Officer
Sean Doherty, Principal
Situated in Room 6 Ext: 203
Email: sean@westminstertutors.co.uk

Deputy Designated Safeguarding Lead and Deputy Prevent Officer
Monika Loewy, Pastoral Coordinator
Situated in Room 18
Email: monika@westminstertutors.co.uk

DSL Trained SLT members
Virginia Maguire, Senior Consultant/Director of Studies
Situated in Room 8
Email: virginia@westminstertutors.co.uk

Will Bynoe, Director of Studies (Academic)
Situated in Room 1
Email: will@westminstertutors.co.uk

Proprietor
David Game
Email: dgame@davidgame-group.com

Chair of the College's Governance Advisory Board
(The Proprietor's designated person for safeguarding is)
Penny Johnson
Email: penny@westminstertutors.co.uk

Out of Hours Contact

- 7.2 In the case of an emergency, please contact the Emergency Services on 999.
- 7.3 When the College is open, a DSL trained member of SLT is available for discussion of concerns during college hours (9:00 a.m. to 6:00 p.m. term time and 10 a.m. to 4 p.m. non-term time).
- 7.4 Outside of college hours, non-emergency safeguarding concerns should be emailed to dsl@westminstertutors.co.uk and will be picked up the next working day.

External Contacts

- 7.5 External responsibilities and therefore details of any external personnel named below may be subject to change without notification to the college. Westminster and the Royal Borough of Kensington and Chelsea share some services, and names and positions may be identical across both.

In an emergency call the police on 999.

The Local Authority Designated Officer (LADO) for Kensington and Chelsea
Aqualma Daniel
Telephone 020 7361 2120
Email: KCLADO.Enquiries@rbkc.gov.uk

Local Safeguarding Children Partnership Kensington & Chelsea and Westminster
Telephone: 07739 315388.

Kensington and Chelsea Duty Line
Telephone: 020 7361 3013
The out of hours (5:00 p.m. to 9.00 a.m.): 020 7361 3013

Children's Social Care (CSC) and the Multi Agency Safeguarding Hub (MASH) for Children at Risk and Children in Need /Early Help /Intervention and Assessment Services
Sharon Aggor
Family Support and Child Protection Adviser
Mobile: 07929 822 2840
Email: sharon.aggor@rbkc.gov.uk

Multi Agency Safeguarding Hub (MASH):
Hammersmith & Fulham - telephone: 020 8753 6610
Kensington and Chelsea - socialservices@rbkc.gov.uk or telephone: 020 7361 3013
Westminster - accesstochildrenservices@westminster.gov.uk or telephone: 020 7641 4000

For MASH general enquiries please contact the Tri-Borough MASH Team Manager
Catherine Hoy
choy@westminster.gov.uk or

Policed Child Abuse Investigation Team – call 101

Police Domestic Abuse Investigation Team – call 10

Child Sexual Exploitation
Sarah Stalker (Child Exploitation Lead)
(Monday/Tuesday and Wednesday only)
Telephone: 020 7598 4640
Mobile: 07971 322 482
Email: sarah.stalker@rbkc.gov.uk

Family Support and Child Protection Adviser:
Anna Richards Mobile: 07974 613 180
Email: anna.richards@rbkc.gov.uk

South Kensington Safeguarding Adults at Risk of Harm
Social Services Line: 020 7361 3013
Emergency Duty Team - 020 7373 2227.

Child Death Review Team - North West London Child Death Review queries
Interim CDR Manager Tanya Nanuwan
nwlccgs.cdr@nhs.net

Specialist Nurse (for Hammersmith and Fulham Kensington and Chelsea and Westminster):
Duduzile Hlatshwayo, Telephone: 0782 454 86330.

The Prevent Coordinators: contact the LBHF/ RBKC Prevent team on:
Telephone: 020 8753 5727
Email: prevent@lbhf.gov.uk

NSPCC Child Protection Helpline:
Telephone: 0808 800 5000

Childline:
Telephone: 0800 1111

The NSPCC Whistleblowing Helpline
Telephone: 0800 028 0285
Email: help@nspcc.org.uk

8. Making Independent External Referrals

- 8.1 Keeping Children Safe in Education (currently in force) makes it clear that anybody can make a direct referral to the MASH including the LADO in line with the referral threshold set by the Local Safeguarding Children Partnership.
- 8.2 If a child's situation does not appear to be improving the staff member with concerns should press for re-consideration.
- 8.3 Where the designated safeguarding does not make referrals lead the designated safeguarding lead should be informed, as soon as possible, that a referral has been made.

9. Sequence Of Events To Be Followed When A Young Person Discloses Abuse Or Neglect

- 9.1 Our guiding principles when a student discloses information are: Receive, Reassure, Respond, Report Record Report and Review (led by the DSL).
- 9.2 Create a safe environment by offering the young adult a private and safe place if possible.

Stay calm and reassure the young person, stressing that they are not to blame.

Tell the young adult that you know how difficult it must have been to confide in you, and that they have done the right thing in telling.

If there is a need for medical attention seek assistance without delay.

- 9.3 Listen, hear and believe carefully and uncritically, at the young adult's pace, to what they have to say. Stay calm, take what is said seriously, reassuring the child but advising that you cannot promise to keep a secret or assure confidentiality (as this may ultimately not be in the best interest of the young adult).
- 9.4 Do not promise everything will be okay (it might not).
- 9.5 A suggested form of words that may help when talking to young adults are as follows: "I will keep our conversation confidential and agree with you what information I can share, unless you tell me something that will affect your personal safety or that is illegal, but I will tell you if I am going to pass information on and who to."
- 9.6 Tell the young adult what you are going to do next after the disclosure.
- 9.7 When talking to the young adult, do not interview the young adult and keep questions to a minimum.

- 9.8 Encourage the young adult to use their own words and do not ask leading questions, interrupt their dialogue, probe for more information or make assumptions which might give particular answers.
- 9.9 Do not paraphrase or offer alternative explanations or suggestions.
- 9.10 Do not repeat the disclosure or ask the young adult to repeat their disclosure other than to clarify what is being said.
- 9.11 Do not panic, or display shock or disbelief.
- 9.12 Seek consent from the young adult to share any information disclosed but should consent not be given, an explanation can be given as to why the DSL must be told.
- 9.13 Record in detail the circumstances and timings of the disclosure including the nature and extent of any injuries, explanations given by the young adult (as much as possible in the young adult's own words) and the action taken (which may be used in any subsequent court proceedings), without personal comment (e.g., negative comments about the alleged abuser; personal observations), within 24 hours after the disclosure, record in writing the child's name, address and date of birth along with the child's behaviour and emotional state, who else was present at the time of the disclosure.
- 9.14 Sign (with time and date) all notes made and give them to the DSL.
- 9.15 When the young adult has finished speaking, do not leave the young adult alone, but speak to someone who can help keep the young adult safe.
- 9.16 Call for immediate assistance from the DSL or Deputy DSL.
- 9.17 The DSL (or other responsible person within the scope of this policy) will then deal with the matter, and this responsible person only.
- 9.16 The young adult has chosen to tell an adult and this account will be believed and actions taken accordingly.
- 9.17 Do not take responsibility for investigating the allegation yourself, as investigation is the sole statutory responsibility of Children's Services and/or the police.
- 9.18 Do not attempt to contact in any way any person mentioned in the disclosure.
- 9.20 Reassure the young adult that you will ensure the matter will be dealt with.
- 9.21 Immediately inform the DSL so that any appropriate action can be taken to protect the student if necessary.

- 9.22 The DSL will consider the information and decide on the next steps.
- 9.23 Every complaint or suspicion of abuse from within or outside the college will be taken seriously and action taken in accordance with this policy.
- 9.24 Never take photographs of injuries or examine marks and injuries solely to assess whether they may have been caused by abuse or investigate or probe, aiming to prove or disprove possible abuse.
- 9.25 Never try to deal with it yourself.
- 9.26 Do not assume that someone else will take the necessary action.
- 9.27 Do not speculate or accuse anybody, confront another person (adult or child) allegedly involved, offer opinions about what is being said or about people allegedly involved or forget to record what you have been told.
- 9.28 Never fail to pass the information on to the correct person or ask a young adult to sign a written copy of the disclosure or a 'statement'.
- 9.29 Never 'gossip' with colleagues about what has been said to you.
- 9.30 Although referrals are normally managed by the DSL, anyone may refer a young adult if necessary.
- 9.31 Our approach is student/child- centered and at all times, we will act in the best interests of the child/young adult.
- 9.32 Staff will reassure victims that they are being taken seriously and that they will be supported and kept safe.
- 9.33 Staff are also clear that the victim should never be given the impression that they are creating a problem by reporting abuse, sexual violence, or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.
- 9.34 Our staff are aware that young adults 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.
- 9.35 By building trusting relationships with our young adults, staff can facilitate communication and know that they can speak to the DSL if they have any concerns about a young adult.

10. Concerns And Allegations Against Staff, Volunteers, DSL, Principal, Governance Advisory Board and Proprietor

- 10.1 This applies where an adult within the college community has behaved in a way that has harmed, may have harmed, or poses a risk of harm to a child. This also applies when an adult within the college community may have possibly committed a criminal offence against or related to a child.
- 10.2 Allegations concerning all, other than the Principal, are to be reported straight away to the Principal (or in their absence, the DSL). The Principal will immediately contact the LADO to discuss the allegation. The individual against whom the allegation is made, is not to be informed.
- 10.3 Allegations concerning the Principal are to be immediately reported to the Chair of the College's Governance Advisory Board (contacted on 07825211191) who will immediately contact the LADO to discuss the allegation. The named Principal is not to be informed.
- 10.4 Allegations against an adult who is no longer employed by the College, or historical allegations, will be referred to the police.
- 10.5 In each case above, the LADO will be given sufficient detail to allow consideration of the nature, content and context of the allegation and to agree a course of action including any involvement of the police.
- 10.6 Guidance will be sought from the LADO and/or police to enable the college to make decisions about whether the person against whom an allegation has been made should be allowed to remain on college premises and if so what, if any, conditions should apply.
- 10.7 If given information that suggests that a member of staff was abusing a student who is not a student at the college, the DSL reports immediately to the LADO and follows the procedure as if it was one of our own students.
- 10.8 In borderline cases, where there is room for doubt as to whether a referral should be made, the DSL will consult with the LADO on a no names basis without identifying the family.
- 10.9 However, as soon as sufficient concern exists that a student may be at risk of significant harm, a referral to MASH will be made without delay.
- 10.10 The college will not investigate allegations without first gaining the agreement of the LADO. In the case of serious harm, the police will be informed from the outset. Discussions will be recorded in writing, with any communication with both the individual and the parents of the child/young adult agreed.
- 10.11 The college will make every effort to maintain confidentiality and guard against publicity if there are allegations against staff up to the point where the accused person is charged with an offence.

- 10.12 The following definitions will be used when determining the outcome of all allegation investigations:
- Substantiated: there is sufficient evidence to prove the allegation;
 - Malicious: there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive;
 - False: there is sufficient evidence to disprove the allegation;
 - Unsubstantiated: there is insufficient evidence to either prove or disprove the allegation. The term, therefore, does not imply guilt or innocence;
 - Unfounded: to reflect cases where there is no evidence or proper basis which supports the allegation being made.
- 10.13 Unsubstantiated, false or malicious allegations: If a report is determined to be unsubstantiated, unfounded, false or malicious, the Designated Safeguarding Lead will consider whether the child and/or the person who has made the allegation needs help or may have been abused by someone else and this is a cry for help.
- 10.14 In such circumstances, a referral to Children's Social Care may be appropriate. Where an allegation by a student is proven to have been deliberately invented or malicious, the Principal will consider whether to take disciplinary action in accordance with the college Behaviour Policy.
- 10.15 Where a parent has made deliberately invented or malicious allegations, the Principal will consider whether to terminate the student's placement at college on the basis that they have treated the college or a member of staff unreasonably, unless a working relationship based on trust, respect and transparency is established moving forward.
- 10.16 The college reserves the right to contact the MASH to determine the appropriate action. We have a duty of care towards our employees by ensuring that effective support is provided for anyone facing an allegation through the College Human Resources (HR)/Personnel arrangements.

Low-Level Concerns

- 10.17 A low-level concern is defined thus; when a member of staff may have acted in a way that is inconsistent with the Staff Behaviour Policy (Staff Code of Conduct), including inappropriate conduct outside of work and does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.
- 10.18 Examples of such behaviour could include, but are not limited to:
- Being over friendly with young adults, having favourites, taking photographs of young adults on their mobile phone;
 - Engaging with a young adult on a one-to-one basis in a secluded area or behind a closed door;
 - Using inappropriate sexualised, intimidating or offensive language.
- 10.19 All low-level concerns about a member of staff should be reported to the Principal or DSL in their absence.

- 10.20 If the concern related to a person employed by a supply agency, that concern should be recorded, shared with the Principal and also the supply agency or employer.
- 10.21 Records of Low-level concerns will be recorded in the same manner as allegations that meet the harms threshold to ensure that any patterns in behaviour are identified and a course of action decided upon.
- 10.22 The harms threshold is the point at which a concern is no longer low-level and constitutes a threat of harm to a student. This threshold is defined as accusations that an adult has:
- Behaved in a way that has harmed a student or may have harmed a student, possibly committed a criminal offence against, or related to, a student or behaved towards a student in a way that indicates they may pose a risk of harm to students;
 - Behaved in any way that indicates they may not be suitable to work with students.

11. The College's Safeguarding Responsibilities

- 11.1 The college takes seriously its responsibility under Section 157 of the Education Act 2002 to safeguard and promote the welfare of young adults; and to work together with other agencies to ensure adequate arrangements within our College to identify, assess, and support those young adults who are suffering harm.
- 11.2 The college is committed to the Equality Act and equal treatment for all, regardless of age, race, sex, disability, religion or belief, sexual orientation, gender reassignment, pregnancy or maternity, marriage and civil partnership.
- 11.3 Furthermore, our staff should not promote any partisan political views or distribute related literature whilst on the premises representing the College.
- 11.4 The College is also committed to promoting and upholding British values and taking very seriously its responsibilities under the Prevent strategy.
- 11.5 Abuse, Neglect, and Exploitation: Working Together to Safeguard Children (currently in force) defines abuse as a form of maltreatment of a student. Somebody may abuse, neglect, or exploit a student by inflicting harm or by failing to act to prevent harm through these means.
- 11.6 All staff at the College are aware that technology is a significant component in many safeguarding and wellbeing issues, specifically that young adults are at risk of abuse online as well as face to face, and that online and offline incidents may occur concurrently or be interlinked.
- 11.7 Young adults may be abused by a family member, institution or a community setting, by those known to them or more rarely by others; e.g. online abuse, any type of abuse that happens on the web, whether through social networks, playing online games or using mobile phones. They may be abused by an adult or adults or another student or young adults.

- 11.8 Online abuse by other young adults can take the form of abusive, harassing, discriminatory, misogynistic/misandrist messages, the non- consensual sharing of indecent images (especially around group chats) and the sharing of abusive images or pornography to those who do not want to receive such content. They may be abused through being witnesses to domestic abuse and young adults can suffer domestic abuse in their relationships.
- 11.9 It is important to remember that significant harm can be ‘actual’ (happening now) or ‘likely’ (events are leading to a situation where harm is probable). To be considered a safeguarding concern or allegation, it is likely that some of the following features may be found (PENS):
- Physical abuse - violence, particularly pre-planned/deliberate; causing injuries such as bruises, broken bones, burns or cuts; forcing others to use drugs or alcohol.
 - Emotional abuse – also known as psychological abuse; blackmail or extortion; emotional maltreatment; threats and intimidation; can cause young adults serious harm.
 - 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.
 - Sexual abuse – indecent exposure/touching or sexual assaults/harassment; forcing others to watch pornography or; sexting, encouraging other students to attend inappropriate parties; photographing or videoing other students performing indecent acts. and child sexual exploitation in which young adults are sexually exploited for money, power or status.
- 11.10 Expert organisations provide guidance and practical support on specific safeguarding issues. The NSPCC offers information for colleges on the TES website and also on its own website www.nspcc.org.uk/preventing-abuse/. Additionally, government guidance is listed on the GOV.UK website: <https://www.gov.uk/>.
- 11.11 When a student needs urgent medical attention and there is suspicion of abuse an ambulance should be called. If the response from the emergency services states that the College should take the child to the hospital then the DSL, with an escort, should take the young person to the Accident and Emergency Unit at the nearest hospital. They should first notify MASH and seek advice about what action the MASH or the police will take and how the parents will be informed. Normally, parents would be informed that a child requires urgent hospital attention.
- 11.12 If the suspected abuse is sexual then the medical examination should be delayed until the MASH and the police can liaise with the hospital unless the needs of the young person are such that medical attention is the priority.
- 11.13 There must at all times be a responsible adult with the young person, whether from the College, MASH or the police, if the parents are not included.
- 11.14 All unnecessary delays should be eradicated and inaction at any level can and should be challenged. In borderline cases, this can be done informally and without giving names in the first instance.

- 11.15 The college will not investigate allegations without first gaining the agreement of the LADO. In the case of serious harm, the police will be informed from the outset.
- 11.16 Discussions will be recorded in writing, with any communication with both the individual and the parents of the young adult agreed.

12. Prevent and Radicalisation

(Please see our Prevent Policy)

- 12.1 If an adult working in our college has concerns or identifies a student as being at risk of radicalisation, the adult should immediately make a referral to our Designated Safeguarding Lead, our Prevent Officer, who will consider the most appropriate referral, which could include Channel or Children's Social Care.
- 12.2 Although decisions to seek support for a child in need, or about whom there are concerns relating to radicalisation, would normally be taken in consultation with parents and students, their consent is not required for a referral when there are reasonable grounds to believe that a child is at risk of significant harm.

13. Thresholds for Intervention

- 13.1 Thresholds for Intervention: If staff have any concerns about a child's welfare, they should act on them immediately, following the procedures set out in this policy. Please see Appendix 4 which sets out the process the College staff will go through if they have concerns about a young person. Options will then include:
- Managing any support for the young person internally via the College or College's own pastoral support processes;
 - An early help assessment; or
 - A referral for statutory services, for example as the child might be in need, is in need or suffering or likely to suffer harm.

Early Help

- 13.2 Early Help: In the first instance staff should discuss early help requirements with our DSL. The DSL will lead on liaising with other agencies and in setting up an inter-agency assessment as appropriate, by using the London Safeguarding Children Procedures Thresholds of Need document to consider the severity of the concern. Early Help in the College allows students to be supported at any point in their life by a range of external support agencies enabling potential concerns to be addressed, to prevent further problems arising or before a young adult may come into immediate danger. Targeted early help services, arranged by the local authority, address the assessed needs of a young adult and their family. It is expected that staff will complete an Early Help Assessment (EHA) when a young adult:

- Is disabled or has certain health conditions and has specific additional needs;
- Has special educational needs (whether or not they have a statutory Education, Health and Care Plan);
- Has a mental health need;
- Is a young carer;
- Is showing signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines;
- Is frequently missing/goes missing from care or from home;
- Is at risk of modern slavery, trafficking, sexual or criminal exploitation;
- Is at risk of being radicalised or exploited;
- Has a family member in prison, or is affected by parental offending;
- Is in a family circumstance presenting challenges for the young adult, such as drug and alcohol misuse, adult mental health issues and domestic abuse; is misusing drugs or alcohol themselves;
- Has returned home to their family from care and/or is showing early signs of abuse and/or neglect;
- Is at risk of honour-based abuse such as Female Genital Mutilation, Breast Ironing, Forced Marriage, etc.
- Is a privately fostered child;
- Is persistently absent from education.

13.3 After gaining consent from the young adult/family to share information gathered from discussions, relevant professionals will be invited to come together in a multi-agency service to assess the young adult's needs and decide with the young adult /family a course of action to provide the services needed.

13.4 The multi-agency service is a team of practitioners established on a case-by-case basis to support a young adult and their family. Where appropriate, students will be provided with a personal risk assessment and/or safeguarding plan.

Allegation Threshold Not Met

13.5 If the allegation threshold is not met, the LADO will agree with the college an appropriate response (e.g. for the agency to undertake further enquiries or undertake an internal investigation).

Allegation Threshold Met

13.6 If the allegation threshold is met a strategy meeting will normally be held either by phone or in person. Normally a member of SLT/safeguarding lead, the LADO, HR, police and social care are invited to attend.

13.7 Relevant information is shared, risks to young adults are considered and appropriate action agreed; e.g. child protection and other enquiries, disciplinary measures or criminal proceedings.

- 13.18 A record of the meeting will be made, and regular reviews will take place until a conclusion is reached.
- 13.19 After gaining consent from the young adult /family to share information gathered from discussions, relevant professionals will be invited to come together to assess the young adult's needs and decide with the young adult/family a course of action to provide the services needed.
- 13.20 This is a multi-disciplinary team of practitioners established on a case-by-case basis to support a young adult and their family.

Child in Need - S17 of the Children Act 1989

- 13.21 A 'Child in Need' referral should be considered where the needs of the young adult are unlikely to be met under an EHA, such as a young adult with complex disabilities, when a social work led assessment is required.
- 13.22 Section 17 of the Children Act says that an assessment for services should be undertaken by the Local Authority in the following circumstances:
- Child(ren)/ young adult(s) are unlikely to achieve or maintain, or to have opportunity to achieve or maintain a reasonable standard of health or development, without the provision of services by a Local Authority.
 - Their health or development is likely to be impaired, or further impaired without the provision of such services.
 - They are disabled.
 - This could include young adults who self-harm or disclose an intent to commit suicide.

Child Protection - S47 Children Act 1989

- 13.23 The Local Authority has a statutory duty to investigate when there is reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm due to the actions or inactions of others.
- 13.24 It is not possible to rely on one absolute criterion when judging what constitutes significant harm.
- 13.25 Consideration of the severity of ill-treatment may include the extent of the harm suffered, the context within which it occurred and its duration.
- 13.26 In order to understand and evidence 'significant harm', it is necessary to consider the family context, together with the young adult's development within their wider social and cultural environment.
- 13.27 Significant harm may also arise from a combination of significant events which are both acute and long standing and which may impair the young adult's physical, psychological and social development.
- 13.28 If staff or volunteers have significant concerns about any young adult, they should make them known to the DSL.

- 13.29 A referral to social care will be made immediately if there is risk of immediate harm to a child and, if a crime may have been committed, the matter will be reported to the police.
- 13.30 It is important to understand that anyone can make a referral.

Working with our Safeguarding Partners

- 13.31 The college will work with social care, the police, health services and other services to promote the welfare of young adults and protect them from harm.
- 13.32 This includes providing a coordinated offer of early help when additional needs of young adults are identified and will contribute to inter-agency plans to provide additional support to young adults subject to child protection plans.
- 13.33 We allow access for social care from the host Local Authority and, where appropriate, from a placing Local Authority, for that authority to conduct, or to consider whether to conduct, various regulated assessments.
- 13.34 Contextual Safeguarding: the college recognises that young adults' behaviours, levels of vulnerability and levels of resilience are all informed by the social/public, as well as private, contexts in which young people spend their time.
- 13.35 When spending time in these extra-familial contexts young people may be exposed to healthy norms which promote pro-social relationships, or they may encounter harmful norms that are conducive to abusive and exploitative relationships.
- 13.36 As a result, we identify, assess and intervene where possible in all the social environments where abuse and exploitation of young people can occur, in essence to take a 'contextual' approach to safeguarding.
- 13.37 Additionally, we help to promote a culture of safety within the curriculum and around the college regarding students' online activities, a place where young people spend an increasing amount of time, raising their vulnerability to potential abuse. We will provide as much contextual information as possible to social care, when a referral is made.

Serious Violent Crime and Serious Violence

- 13.38 Staff are aware of the indicators, which may signal that young adults are at risk from, or are involved with serious violent crime.
- 13.39 These may include increased absence from college, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries.

- 13.40 Unexplained gifts or new possessions could also indicate that young adults have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation.
- 13.41 All staff are made aware of the range of risk factors that increase the likelihood of involvement in serious violence, such as being male, having been frequently absent or permanently excluded from education, having experienced previous maltreatment and having been involved in offending, such as theft or robbery.
- 13.42 If staff suspect that a student is at risk of serious violence, this will be reported to the DSL immediately.

Concerns And Allegations Of Abuse Made Against Other Young Adults

13.43 Please refer to the college. Our policies include:

- Anti-Bullying Policy
- Online Safety
- Behaviour Policy

Child-on-child abuse

- 13.44 Staff are clear as to our policy and whole College approach with regards to child-on-child abuse whether inside or outside college or online and are trained to manage a report of child-on-child sexual violence and sexual harassment.
- 13.45 The College understands that such abuse may still be taking place and simply not being reported.
- 13.46 We recognise the gendered nature of child-on-child abuse (i.e. that it is more likely that females will be victims, and males the perpetrator(s)), but that all child-on-child abuse is unacceptable and will be taken seriously. We have a zero-tolerance approach to abuse and that it should never be tolerated or dismissed as 'just banter', 'just having a laugh', 'part of growing up' or 'boys being boys' and downplaying certain behaviours can lead to a culture of unacceptable behaviours, an unsafe environment for young adults and in worst case scenarios a culture that normalises abuse leading to young adults accepting it as normal and not coming forward to report it.
- 13.47 Child-on-child abuse can take many forms, including:
- Bullying (including cyberbullying, prejudice-based and discriminatory bullying);
 - Abuse in intimate personal relationships between peers;
 - Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse);
 - Sexual violence, such as rape, assault by penetration and sexual assault;(this may include an online element which facilitates, threatens and/or encourages sexual violence);

- Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse;
- 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;
- Consensual and non-consensual sharing of nudes and semi nudes images and or videos (also known as sexting or youth produced sexual imagery);
- Up skirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm; and
- Initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

13.48 When dealing with abuse by young people on peers, we follow the key safeguarding documents, Keeping Children Safe in Education (currently in force) and Working Together to Safeguard Children (currently in force), even where an alleged perpetrator(s) is a child. The Proprietor is aware of their obligations under the Human Rights Act and the Equality Act alongside our local multi-agency safeguarding arrangements. This includes careful consideration to how the College supports our students with regard to particular protected characteristics - including disability, sex, sexual orientation, gender reassignment and race.

13.49 Sexualised abuse, including verbal abuse by peers is a safeguarding issue and is included in the College's broader approach to safeguarding. If the college received an allegation of abuse by one or more students that is alleged to have taken place outside of the college premises, our safeguarding principles remain the same, and we would still carry out a referral to children's services as necessary.

13.50 However, where there is 'reasonable cause to suspect that a student is suffering, or likely to suffer significant harm' the concern or allegation of Child-on-child abuse must be reported to the DSL immediately, who will then refer to the MASH to discuss the case.

13.51 A factual record should be made of the concern or allegation, but no attempt at this stage should be made to investigate the circumstances. A copy of the discussions and outcomes will be kept in both students' files. Additionally, if appropriate the DSL will also refer students to an external safeguarding agency such as Childline and NSPCC. This will entail:

- Effective implementation of the College's usual safeguarding and anti-bullying policies (and recognition that sexualised abuse, including verbal abuse, by peers is a potential safeguarding issue);
- Seeking advice from statutory agencies, as appropriate, and readiness to make a referral if an incident meets the referral threshold set by the local Safeguarding Children Partnership;
- If a young adult is in immediate danger or is at risk of harm, an immediate referral to social care and/or the police;
- Following the advice for practitioners in: What to do if you're worried a child is being abused;
- Effective information sharing with any agencies or other professionals involved;

- Where allegations of abuse or assault have been made against one or more of our students, a thorough risk-assessment of the situation and risk-based decision-making (with the benefit of the advice of statutory authorities, where appropriate) should be carried out with a view to ensuring the safety of all students and that both alleged victims and perpetrator students receive appropriate support.
- Decisions arising that might include, for example, whether the accused student should be removed from the College for a period of time, or from certain classes; whether contact with certain individuals should be prevented or supervised,
- The availability of counselling, the adequacy of arrangements for listening to young adults etc;
- Good record keeping of related conversations, meetings and communications.

Minimising the Risk of Child-On-Child Abuse

13.52 The college recognises the wide variety of students' backgrounds and cultures who attend the college and as such, the requirement for us to promote students to respect, tolerate and show good will toward each other.

13.53 We have employed a number of procedures to help minimise the risk of child-on-child abuse, with the majority of these focusing on educating our students about what is and what is not appropriate with regards to all forms of relationships with their peers.

13.54 As part of our PSHCE sessions, we promote healthy and respectful communications and behaviours between our students and provide an environment which challenges inappropriate behaviour. We teach our students to look out for potential signs that there may be an imbalance in power or control, the importance of permission-seeking and giving in relationships with friends, peers and adults and what to do to seek support.

13.55 We make it explicit to our students what constitutes sexual harassment and sexual violence and why these are always unacceptable. We also teach our students about different types of bullying (including cyberbullying), the impact of bullying, responsibilities of bystanders (primarily reporting bullying to an adult) and how to get help.

13.56 Staff also understand that young adults may be reluctant to report child-on-child abuse when it occurs on social media platforms or gaming sites which they might regard as inappropriate. It is made clear that any instances of child-on-child abuse will be handled with a view to protecting pupils, irrespective of the medium.

Sexual Violence and Sexual Harassment Between Young Adults

13.57 At the college, we take our definition of sexual violence from the Sexual Offences Act 2003, which considers rape, assault by penetration and sexual assault, all types of sexual violence.

- 13.58 The college recognises that sexual violence can happen both inside and outside of college and can occur online and offline. In addition, we define sexual violence as ‘unwanted conduct of a sexual nature’ that can occur online and offline.
- 13.59 Sexual violence and sexual harassment can be between two young adults, or a group of young adults of any age and sex. Both sexes may be affected, although girls are more likely to be victims of sexual violence, and boys are more likely to be perpetrators of sexual harassment. Sexual violence and sexual harassment exist on a continuum and may overlap; they can occur online and face to face (both physically and verbally) and are never acceptable.
- 13.60 We recognise, and reflect in our SEND Policy which is available on the website, that Young adults with SEND are likely to be more vulnerable.
- 13.61 The college is aware that online sexual violence or sexual harassment can be more complex, such as images shared at another college or across the internet, or the victim being excluded offline as well as online.
- 13.62 Sexual harassment is likely to: violate a young adult’s dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment.
- 13.63 We recognise that sexual violence and harassment can occur both online and offline, both physically and verbally and is never acceptable. We make it clear that all forms of sexual violence and harassment are unacceptable and will not be tolerated. Whilst not intended to be an exhaustive list, sexual harassment can include:
- Sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names,
 - Sexual “jokes” or taunting;
 - Up skirting;
 - Physical behaviour, such as: deliberately brushing against someone, interfering with someone’s clothes (this may cross a line into sexual violence) and displaying pictures, photos or drawings of a sexual nature; and online sexual harassment, which might include; non-consensual sharing of nude and semi-nude images and or videos (both often referred to as sexting); inappropriate sexual comments on social media; exploitation; coercion and threats.
- 13.64 Online sexual harassment may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence.
- 13.65 Responding to reports of sexual violence and sexual harassment: Sexual harassment (as set out above) creates an atmosphere that, if not challenged, can normalise inappropriate behaviours and provide an environment that may lead to sexual violence.
- 13.66 We recognise that young adults may not find it easy to tell staff about their abuse verbally and that staff may be informed by a third party or through behaviour indicators of the victim.

- 13.67 We understand the importance of the college role in acting upon any concerns immediately and making sure all victims are reassured and that they are being taken seriously, regardless of how long it has taken them to come forward. Though it may not be necessary to report one-off issues of sexual harassment to the police, each allegation of abuse will be taken seriously, and the Designated Safeguarding Lead will still refer these allegations to social care, who will support the college in deciding whether the victim or alleged perpetrator(s) are in need of protection or other services.
- 13.68 However, all allegations of sexual violence will be reported to the police, in parallel with social care.
- 13.69 Though young adult sexual behaviours can be developmentally expected, some more harmful sexual behaviours may cause developmental damage.
- 13.70 Harmful Sexual Behaviour (HSB) can occur online and/or face-to-face.
- 13.71 Reports of sexual violence are often complex and require difficult decisions to be made, on a case-by-case basis, with the DSL taking the lead role, supported by external agencies such as social care or the police.
- 13.72 Some situations are statutorily clear: a child under the age of can never consent to sexual activity (the age of consent is 16); sexual intercourse without consent is rape (as defined in law); creating or sharing sexual images or videos of under 18s is illegal, including young adults making or sharing these themselves.
- 13.73 Actions following a report of sexual violence and/or sexual harassment: A factual record should be made of the concern or allegation, taking the victim seriously, but no attempt at this stage should be made to investigate the circumstances, unless a child/young adult is in immediate danger or is at risk of harm, in which case, an immediate referral will be made to social care and/or the police. Every report will be considered on a case-by-case basis.
- 13.74 Additionally, in cases where there is a report of rape, assault by penetration or sexual assault this should be passed to the Police.
- 13.75 Victims will never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment; they will not be made to feel ashamed for making a disclosure.
- 13.76 We explain to our students in such a way that avoids alarming or distressing them that the law is in place to protect young people rather than criminalise them.
- 13.77 The DSL will follow the advice for practitioners in: what to do if you're worried a child is being abused, and will follow through the outcomes of the discussion and if so advised by social care, will make a formal referral if the incident meets the referral threshold set by the London Safeguarding Children Procedures for Chelsea and Kensington, ensuring effective information sharing with any agencies or other professionals involved.

- 13.78 The DSL will ensure good record keeping of related conversations, meeting and communications with a copy of the discussions, and outcomes will be kept securely.
- 13.79 Staff should not assume that someone else is dealing with the incident and should discuss concerns with the DSL.
- 13.80 Where an incident between students takes place away from the college, the college duties and procedures remain the same.
- 13.81 College Staff are trained as per Part One of KCSIE on how to manage a disclosure and are aware of anonymity in cases where an allegation is progressing through the criminal justice system.
- 13.82 The college will do all they reasonably can to protect the anonymity of any young adults involved in any report of sexual violence or sexual harassment, including considering the impact of social media.
- 13.83 The DSL will make an immediate written risk and needs assessment where there has been a report of sexual violence, considering the victim, alleged perpetrator(s) and other young adults and staff at the college (including actions to protect them).
- 13.84 Where there has been a report of sexual harassment, the need for a risk assessment should be considered on a case-by-case basis.
- 13.85 Risk assessments will be kept under review. 8 In cases of sexual violence a professional risk assessment by external specialists may be required, and should be used to inform the college's own risk assessment.
- 13.86 The college will carefully consider any report of sexual violence or harassment and act in the best interests of the child/young adult.
- 13.87 The college will also consider carefully when to inform the alleged perpetrator(s), and this may be discussed with relevant agencies.
- 13.88 The college actively considers the risks posed to our students and ensures adequate measures are in place to protect students and keep them safe.
- 13.89 Staff may be expected to participate in any early help assessment, child protection enquiry, strategy discussion or other outcome, following a referral.
- 13.90 With any report of sexual violence and/or harassment, the DSL will consider:
- The wishes of the victim in terms of how they want to proceed. Victims will 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;
 - 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 adults involved, the developmental stages of the young adults involved;
- Any power imbalance between the young adults, including age gaps or differences in maturity, cognition or understanding (including SEND or learning difficulties);
- If the alleged incident is a one-off or a sustained pattern of abuse;
- Intra familial harms and any necessary support for siblings following incidents;
- That sexual violence and sexual harassment can take place within intimate personal relationships between peers;
- Are there ongoing risks to the victim, children, other young adults, adults, students or college staff and
- Other related issues and wider context.

Managing the Report

13.91 Whatever the college's response, it is underpinned by the principle that sexual violence and sexual harassment is never acceptable and will not be tolerated.

13.92 All concerns, discussions, decisions and reasons for decisions will be recorded. Dependent on the disclosure of sexual violence or sexual harassment, the college will consider the following courses of action:

- Managing internally: in some cases of sexual harassment (such as one-off incidents) the college may manage the incident internally, without the involvement of early help, following our behaviour management policy;
- Involve early help: when a report may not require the use of statutory intervention, involving early help is particularly useful in addressing non-violent, harmful sexual behaviour and may prevent escalation;
- Referral to social care: in cases where there has been harm, is at risk of harm, or there is an immediate danger, a referral will be made to social care. Parents/carers/guardians will generally be informed of this, unless there is a clear reason not to at this stage. A risk and needs assessment will also be produced at this stage;
- Reporting to the police: in cases where rape, assault by penetration or sexual assault is reported. The College will not wait for the outcome of a police investigation before protecting the victim, perpetrator and other young adults in the College. The DSL will work closely with the police to ensure that the College actions do not jeopardise the police investigation. If a young adult is convicted or cautioned, the college will update the risk assessment and consider suitable action through the Behaviour Policy.

13.93 It is important for the college to ensure the victim and perpetrator remain protected, especially from bullying or harassment.

13.94 Where no further action is taken, or a young adult found not guilty, the college will continue to support the victim and perpetrator.

How Victims of Child-On-Child Abuse Will Be Supported

- 13.95 All students involved, whether perpetrator or victim, are treated as being 'at risk'; a thorough risk-assessment and risk-based decision-making (with the benefit of the advice of statutory authorities, where appropriate) will be carried out with a view to ensuring the safety of all students, whether the accused student should be removed from college for a period, or removal of the alleged perpetrator(s) from classes and any transport etc. which is shared with the victim, whether contact with certain individuals should be prevented or supervised, the availability of counselling such as referring students to an external safeguarding agency such as ChildLine and NSPCC and the adequacy of arrangements for listening to young adults etc.
- 13.96 We recognise that any actions taken will be in the best interests of both young adults and is not perceived to be a judgement of guilt of the alleged perpetrator(s).
- 13.97 Additionally, the College:
- Support for the victim will consider their age, the nature of the allegations and the risk of further abuse; an alleged perpetrator(s) may have unmet needs themselves;
 - Ensures needs and wishes of the victim will be paramount, and they will be able to continue their normal routine as far as possible, so that college is a safe space for them;
 - Will be prepared to support a victim over a long period of time;
 - The college will do everything we reasonably can to protect victims from bullying or harassment as a result of any report they have made.
 - Ensures that if a victim or perpetrator moves to another college it is important that the new establishment is made aware of any ongoing support needs.
 - Must ensure the victim is safeguarded, but still provide the perpetrator with an education and support as necessary.
 - May discipline the alleged perpetrator(s), including while the police or social care investigation is ongoing, although they will liaise with these bodies to assist in determining any sanctions.
 - Will be clear about when their actions are to support the victim or perpetrator, and when their actions are to discipline the perpetrator for their past conduct.
- 13.98 A student against whom an allegation of abuse has been made may be excluded from the college for a fixed period during the investigation and the college's policy on behaviour will apply.
- 13.99 If it is necessary for a student to be interviewed by the police in relation to allegations of abuse, the college will ensure that, subject to the advice of social care, the student's parents are informed as soon as possible, and that the student is supported during the interview by an appropriate adult.
- 13.100 Normally, the DSL will try to discuss any concerns about a young adult's welfare with the family and where possible to seek their agreement to make a referral to MASH if necessary.
- 13.101 However, in accordance with DfE guidance, this will only be done when this will not place the young adult at increased risk.

13.102 The young adult's views will also be considered.

13.103 Where neither social services nor the police accepts the complaint, a thorough college investigation should take place into the matter using the college's usual disciplinary procedures.

13.104 In situations where the college considers a safeguarding risk is present, a risk assessment will be prepared along with a preventative supervision plan.

13.105 The plan should be monitored, and a date set for a follow-up evaluation with everyone concerned. We draw upon the support offered by The National Organisation for the Treatment of Abusers (NOTA) to support staff training on sexual violence and harassment between peers.

Working With Parents and Carers

13.106 The college will, in most cases, engage with the parents of both the victim and the perpetrator and will consider carefully what information they provide.

13.107 It is good practice for the college to meet the victim's parents with the victim present to discuss safeguarding arrangements and also good practice to meet the perpetrator's parents to discuss what arrangements are being put in place, such as moving them out of classes.

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

13.109 Where appropriate, the DSL should help the parents understand that a referral is in the interests of the young adult and that the college will be involved in the enquiry or police investigation.

3.110 Supporting witnesses of sexual violence or sexual harassment: Consideration should be given to supporting young adults who have witnessed sexual violence, especially rape and assault by penetration.

13.111 Witnessing such an event is likely to be traumatic and support may be required. Following any report of sexual violence or sexual harassment, it is likely that some young adults will take "sides".

13.112 The college should be doing all they can to ensure both the victim and alleged perpetrator(s), and any witnesses, are not being bullied or harassed.

13.113 Social media is very likely to play a significant role in the fall out from any incident or alleged incident.

13.114 There is the potential for contact between victim and alleged perpetrator(s) and a very high likelihood that friends from either side could well harass the victim or alleged perpetrator(s) online.

13.115 When writing a risk-assessment for the students involved in an incident of sexual violence or sexual harassment, the college will consider any additional potential support needs to keep all our students safe.

14. Preventing Extremism and Radicalisation

(Also please refer to our Preventing Extremism and Radicalisation Policy)

- 14.1 The College also ensures that we can 'demonstrate activity', as required by the statutory guidance, in the following key areas: risk assessment of students being drawn into terrorism, including support for extremist ideas that are part of terrorist ideology, working in partnership, staff training and IT policies. This is wholly in keeping with the College ethos and approach to promote a broad, tolerant and open-minded understanding of the world around us, including an appreciation of the democratic process and precluding the promotion of partisan political views in the classroom, in extra and co-curricular activities, or in any other aspect of College activities.
- 14.2 The College is able to demonstrate a general understanding of the risks affecting students and young people in the area.
- 14.3 Protecting students from the risk of radicalisation is seen as part of the College's wider safeguarding duties, and is similar in nature to protecting students from other harms (e.g. drugs, gangs, neglect, sexual exploitation), whether these come from within their family or are the product of outside influences. We understand that during the process of radicalisation, it is possible to intervene to prevent vulnerable people from being radicalised.
- 14.4 We consider the level of risk of students identified as being at 'risk of radicalisation' and make an appropriate referral, which can include Channel or social care. Our Prevent Strategy demonstrates a specific understanding of the risks affecting young adults and an identifying students who may be at risk of radicalisation, including the support we can give.

Prevent duty

- 14.5 The DSL receives appropriate training, in accordance with Annex B of KCSIE (including higher level Prevent awareness training) at least every two years in order to:
- Provide advice and support to members of staff on protecting students from radicalisation;
 - Equip staff through Prevent, Channel and other appropriate training to identify and assess students at risk of being drawn into terrorism and to challenge extremist ideas;
 - Liaise with those responsible for Personal, Social, Health and Economic Education and other appropriate curricular programmes actively to promote British values and to teach students about the dangers of radicalisation and extremism and;
 - Liaise with those responsible for the College electronic systems seriously to limit through appropriate filtering mechanisms the scope for access through these systems to any website or Internet source deemed problematic from a Prevent perspective.

- 14.6 Teaching students how to Keep Safe (Educating students about safeguarding and radicalisation including the delivery of the prevent strategy): Our programme for PSHCE supports the process of helping our students develop an understanding of keeping safe and maintaining wellbeing as part of a broad and balanced curriculum.
- 14.7 Within our PSHCE curriculum, we have a programme for Relationship and Sex Education (RSE) which includes issues such as:
- “Sexting”, “banter”, sexual assault between young people and gender-based issues, healthy and respectful relationships;
 - What respectful behaviour looks like, gender roles, stereotyping, equality;
 - Body confidence and self-esteem, prejudiced behaviour;
 - Keeping safe whilst online, when accessing remote learning, the dangers of Cyber-bullying and
 - That sexual violence and sexual harassment is always wrong; and addressing cultures of sexual harassment.

15. Promoting Positive Relationships

- 15.1 We ensure that our students are aware of the dangers of these safeguarding issues and promote positive relationships based on mutual respect.
- 15.2 We make it clear to all of our students that sexual relationships between students are strictly prohibited.
- 15.3 Through our college values, we encourage students to respect others, in particular within this topic.
- 15.4 Age-appropriate anti-bullying assemblies are held during anti-bullying week and as part of our PSHCE programme during the college year. Additionally, whenever appropriate subjects in the curriculum and co-curriculum activities will be used to reinforce the messages given.
- 15.5 We follow the standards for safeguarding and protecting young adults in sport stated by the NSPCC Child Protection in Sport Unit NSPCC Standards for Safeguarding in Sport.
- 15.6 Staff will determine, in consultation with parents, when it is appropriate to address issues of sexting and inappropriate banter with our students.
- 15.7 If a member of staff becomes aware of an allegation or suspected case which involves sexting, inappropriate banter or sexual assault between young students, gender based or otherwise, this will be considered as a safeguarding concern and reported to the DSL, who will consider the allegation on a case-by-case basis.
- 15.8 Depending on the severity of the case, this may involve the college's anti-bullying procedures or the parents of the students involved.

15.9 In the case of serious harm, a referral to the MASH will be completed and the police are informed from the outset.

16. LGBTQIA+

16.1 Whilst we recognise that a child or a young person who may be LGBTQIA+ is not in itself an inherent risk factor for harm, young adults who are LGBTQIA+ can be targeted by other young adults.

16.2 In some cases, a child who is perceived by other young adults to be LGBTQIA+ (whether they are or not) can be just as vulnerable as young adults who identify as LGBTQIA+.

16.3 The college endeavours to reduce the additional barriers faced for these pupils and we will provide a safe space for them to speak out or share their concerns with a trusted member staff as required.

16.4 We build LGBTQIA+ inclusion into part of our Relationships Education, Relationship and Sex Education and Health Education curriculum, including how to counter LGBTQIA+ bullying and abuse.

17. Racist Incidents:

17.1 Our policy on racist incidents is set out separately under our Behaviour /Anti-bullying policies, which acknowledge that repeated racist incidents or a single serious incident may lead to consideration under child protection procedures.

17.2 We keep a record of any racist incidents.

Online Safety

(Please see our Online Safety Policy for more details)

17.3 We have an effective whole college approach to online safety which empowers us to protect and educate our students and staff in their use of technology and establishes mechanisms to identify, intervene in, and escalate any concerns where appropriate.

17.2 The Proprietor and the Senior Leadership Team ensure that students are safe from potentially harmful and inappropriate content including terrorist and extremist material when accessing the internet on college systems through appropriate levels of filtering, internet safety rules and online safety education with the curriculum in line with our Online Safety Policy.

17.3 We ensure our approach to online safety is compliant with the filtering and monitoring standards and this is reviewed regularly to ensure effectiveness. However, we are careful to ensure “over blocking does not lead to unreasonable restrictions.

- 17.4 We have a whole college approach to online safety, including a clear policy on the use of mobile technology which is integrated, aligned and considered as part of the overarching safeguarding approach.
- 17.5 We ensure staff are appropriately trained in online safety and we carefully consider how to measure mobile data usage on the college premises through our Behaviour Policy
- 17.6 As part of staff training, the leadership team ensure that staff know how to escalate concerns they may have about a student in relation to online safety.
- 17.7 Staff are aware that technology is a significant component in many safeguarding and wellbeing issues.
- 17.8 Young adults are at risk of abuse online as well as face to face. In many cases abuse will take place concurrently via online channels and in daily life.
- 17.9 Students understand the risks posed by adults or young people, who use the internet and social media to bully, groom, abuse or radicalise young people, especially students and vulnerable adults.
- 17.10 In planning curriculum input in relation to online safety we will ensure materials are differentiated to take account of the different ages, levels of understanding and vulnerabilities of our students so that all students are enabled to access this input effectively.
- 17.11 We acknowledge that as well as providing a variety of positive opportunities, the use of technology has become a significant component of many safeguarding issues and can provide the platform that facilitates exploitation of young adults and young people. This includes the rise of harmful online challenges and online hoaxes, which the college educates about within our online safety curriculum. The breadth of issues classified within online safety are considerable but can be categorised into four areas of risk:
- Content: being exposed to illegal, inappropriate or harmful content.
 - Contact: being subjected to harmful online interaction with other users.
 - conduct: personal online behaviour that increases the likelihood of, or causes harm, such as the sending of explicit images or online bullying.
 - Commerce: risks such as online gambling, inappropriate advertising, phishing and or financial scams.
- 17.12 Staff are in regular contact with parents and carers, communicating the requirements of students' online usage, including which online resources students are required to use for their studies and who from the college they may be interacting with.
- 17.13 Staff also support parents and carers in providing links to current advice and guidance on digital safety, including social media and online radicalisation risks.

Use of Mobile Phones, Cameras and Electronic Devices

- 17.14 Staff should not use personal mobile telephones in the presence of students and must never be used for taking or storing images or recordings of students.
- 17.15 Any images or recordings should only be taken, edited or stored on college computers.
- 17.16 Photographs or recordings should only be made where there is a legitimate college purpose; students' privacy and dignity must be preserved at all times.
- 17.17 Images or recordings should not be transmitted to third parties without permission of the Principal or parents of the student involved.
- 17.18 The College's' Acceptable Use Policy sets out the expectations for students and parents on the use of mobile phones and cameras whilst at the college.
- 17.19 Staff should not use any other electronic device capable of capturing images of students other than a college camera, iPad or iPod. This is in line with the whole college policy on the use of mobile phones and cameras.
- 17.20 The LADO is to be informed if there is any contravention of the college policy regarding the use of personal mobile phones, cameras or other electronic and communication devices by adults working or volunteering at the college.
- 17.21 During staff induction, staff are reminded that they must keep their mobile phones secure and not use them during lessons and that only cameras provided by the college may be used to capture images of young adults (for use in the learning journal and other legitimate record keeping).
- 17.22 The LADO is to be informed if there is any contravention of the college policy regarding the use of personal mobile phones, cameras or other electronic and communication devices by adults working or volunteering at the college

18. On-Going Training

- 18.1 Our arrangements for the level and focus of role-appropriate and refresher training is in accordance with KCSIE 2024.
- 18.2 All staff are provided with copies of key documents which they are required to understand.
- 18.3 If staff have difficulty reading English, our college takes steps to ensure that they understand key information. This includes the active promotion of British values and an understanding of extremism and radicalisation and child exploitation.

- 18.3 All our staff are made aware of the systems which support safeguarding in our college and these are explained to them, as part of their staff induction as well as on-going training. This includes:
- The child protection policy (safeguarding policy); their role in the early help process; the identity of the DSL and Deputy DSL's and information about their roles (such as the implications for mental health and pastoral care and how to identify students at risk of radicalisation);
 - The college's policy and procedures for dealing with child-on-child abuse, including how to manage a report of child-on-child sexual violence and sexual harassment;
 - The college's safeguarding response to young adults who go missing from education, including being given a copy of the college's Students Missing Education Policy.
 - The Staff Code of Conduct (which covers as a minimum, acceptable use of technologies, staff student relationships low-level concerns and communications, including via social media and whistleblowing);
 - Part one of KCSIE (DfE: Sept. 2024) and 'Annex A' (which includes some types of abuse formerly mentioned in Part One of KCSIE) and copies of policies (such as behaviour management policy, anti-bullying (Countering Bullying) Policy, whistleblowing policy, young adults who are missing education and online safety including cyber bullying);
 - The college's student behaviour policy, including our measures to prevent bullying, including cyberbullying, prejudice-based and discriminatory bullying;
 - Ensuring all staff are sensitised to act when any incident may be referred to as bullying, tyrannize, terrorise, intimidate, harass, etc., even if the alleged person has no history of that behaviour;
 - Effective Behaviour Management, ensuring a good and safe educational environment that meets the needs of all students;
 - Annual Child Protection (including online safety) and Prevent Duty training.
- 18.4 Our Governance Advisory Board will also be expected to fully understand Part Two of KCSIE (DfE: Currently in force) also.
- 18.5 We assist staff in understanding and undertaking their roles and responsibilities as set out in Part One of KCSIE. This includes talking new staff through the content of Part One in a level and depth appropriate and proportionate to the person and/or to the particular role for which they are being inducted.
- 18.6 Updates and refreshers will also be given during staff meetings. There is also training and reminders in staff meetings.
- 18.7 The DSL monitors the outcome of staff training through post-training discussions with staff, highlighting any gaps in staff knowledge or failings on procedures.
- 18.8 All staff undertake Prevent awareness training and are able to refer students to the DSL for further help.

- 18.9 Staff are informed of arrangements to listen to students by the use of counsellors, listeners, helplines and other systems to gain views and insight. When relevant, we would work in partnership with our local Prevent co-ordinator. When available in our Local Authority for our students' age group, WRAP training will be provided for all staff.
- 18.10 Our Safeguarding training for the Governance Advisory Board equips them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place are effective and support the delivery of a robust whole-college approach to safeguarding.
- 18.11 Our staff receive annual online safety training which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring (including at Induction) highlighting key requirements from our online safety policy.
- 18.12 Online safety training for staff is integrated, aligned and considered as part of the overarching safeguarding approach. In addition, all staff receive safeguarding and child protection updates (for example, via email, e-bulletins and staff meetings) as required but at least annually, to provide them with the relevant skills and knowledge to safeguard students effectively.
- 18.13 Our Staff are also made aware of the early help process and understand their role in it. This includes identifying emerging problems, liaising with the DSL, sharing information with other professionals to support early identification and assessment and, in some cases, acting as the lead professional in undertaking an early help assessment.
- 18.14 Our staff are made aware of the process for making referrals to MASH and statutory assessments under the Young adults Act of 1989 that may follow a referral, along with the role they might be expected to play in such assessments.
- 18.15 The DSL makes it clear in induction, in other training, and in guidance provided for staff they have a responsibility to speak up about safeguarding and welfare matters within the college and to external agencies where necessary. This is one part of our establishing a positive safeguarding culture. This applies not only to new staff but also to those already in post. There is also training and reminders in staff meetings.
- 18.16 All staff members and the Proprietor will undertake appropriate child protection training.
- 18.17 The College provides an annual update to all staff.
- 18.18 The DSL and Deputy DSL attend training every 2 years in line with requirements within KCSIE, inter-agency working.
- 18.19 Such training will include local inter-agency protocols and training in the approach to Prevent duties. Additionally, Prevent Training is included at the beginning of college year INSET.

18.20 Governance Advisory Board members receive online safety training as part of their safeguarding training – this training is not the same as staff, and focuses on their role and responsibilities regarding online safety and the college’s online safety procedures. They ensure that our delivery is effective and that our approach to online safety is robust.

19. Students who are particularly vulnerable

19.1 We recognise that some students are more vulnerable to abuse, neglect, and exploitation and that additional barriers exist when recognising abuse for some young adults.

19.2 We understand that this increase in risk is due more to societal attitudes and assumptions or child protection procedures, which fail to acknowledge students’ diverse circumstances, rather than the individual’s personality, impairment or circumstances, such as young carers or those with special educational needs or disabilities.

19.3 A young carer is a person under 18 who provides or intends to provide care for another person (of any age, except generally where that care is provided for payment, pursuant to a contract or as voluntary work).

19.4 The young adult may be more prone to peer group isolation or bullying (including prejudice-based bullying) and disproportionately impacted by the behaviour without outwardly showing any signs that they are experiencing it. In some cases possible indicators of abuse, such as a young adult’s mood, behaviour or injury, might be assumed to relate to the young adult’s impairment or disability rather than giving a cause for concern; or a focus may be on the child’s disability, special educational needs or situation without consideration of the full picture. In other cases, such as bullying, the child may be disproportionately impacted by the behaviour without outwardly showing any signs that they are experiencing it.

19.5 Some young adults may also find it harder to disclose abuse due to communication barriers and difficulties in managing or reporting these challenges, lack of access to a trusted adult or not being aware that what they are experiencing is abuse.

19.6 Particular vigilance will be exercised in respect of students who are the subjects of Child Protection Plans and any incidents or concerns involving these students will be reported immediately to the allocated Social Worker (and confirmed in writing).

19.7 If a student discloses that they have witnessed domestic violence, or it is suspected that they may be living in a household which is affected by family violence, this will be referred to the DSL as a safeguarding issue.

19.8 If it comes to our notice that a child under the age of 13 is, or may be, sexually active, this will result in an immediate referral to MASH and advice being given to the DSL. This will determine how and when information will be shared with parents/guardians/carers and the investigating agencies.

Safeguarding Disabled Students and Students With Medical Conditions

- 19.9 Our staff are alert to those students with longer-term medical conditions who are young carers or have special educational needs or disabilities the college is aware that disabled students (especially those who board at the college) experience greater risks, vulnerability and barriers to services and resources.
- 19.20 They may have additional needs relating to physical, sensory, cognitive and/or communication impairments.
- 19.21 Some disabled students may be more vulnerable to abuse because it could be assumed that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration; they may have fewer outside contacts (isolation) than other students; receive intimate, personal care; have an impaired capacity to resist or avoid abuse; have communication difficulties; fear losing services or; be more vulnerable to peer abuse (e.g. bullying, sexual assault, intimidation).
- 19.22 Our staff are alert to the medical needs of students including those students with longer-term medical conditions or disabilities and offer additional pastoral support to these students.

Listening to the Wishes of Young Adults and Young People

- 19.23 If the college becomes aware of a safeguarding concern, the college will ensure the student's wishes and feelings are taken into account when determining what action to take and what services to provide, though the college will operate with the best interests of the child at heart.
- 19.24 We believe it is critical that our students have an adult who they can trust and the College ensures that there are appropriate systems so students know who they can turn to and that staff will listen to them. These include: the Student Voice; Staff and therapists; PSHCE and Spiritual, Moral, Social and Cultural (SMSC) Curriculum and Helplines such as NSPCC and Child line (Contact numbers are at the end of this policy).
- 19.25 The college actively encourages a sensitive and open 'listening' environment in which staff and students may feel free to discuss general matters relating to safeguarding and to raise specific concerns.
- 19.26 Members of staff should use the college's whistleblowing policy should they have any concerns about the handling of safeguarding matters either in general or in specific cases.

20. Looked After Young adults

- 20.1 The Principal will ensure staff have the skills, knowledge and understanding necessary to keep safe young adults who are looked after by a Local Authority if they have such young adults on roll. This

includes ensuring that there is a designated member of staff with responsibility for their welfare and progress and educational achievement and ensuring this person has up to date assessment information from the relevant Local Authority to ensure prompt action is taken where necessary to safeguard these young adults.

- 20.2 The DSL will also have responsibility for promoting the educational achievement of young adults who have left care through adoption, special guardianship or child arrangement orders or who were adopted from state care outside England and Wales. This includes the young adult's social worker, the most recent care plan and contact arrangements with parents, and delegated authority to carers including the young adult's legal status.

21. Student Mental Health and Wellbeing

(Please also refer to the College Mental Health and Wellbeing Policy)

- 21.1 The College takes its responsibilities towards students that may be experiencing mental health difficulties seriously.
- 21.2 We provide support including having links with therapists, psychiatrists and the NHS.
- 21.2 The staff team being responsible for the safety and wellbeing of students, operate an 'open door' policy to encourage students to seek help themselves and for staff to refer any concerns so they are dealt with quickly and appropriately.
- 21.2 We work closely with these professionals to maintain the student's safety within the college and adhere to any advice and guidance we are given.
- 21.3 We want to make sure our students are happy, healthy and thrive and understand we all need a little help from time to time with the busy and stressful lives we have today.
- 21.4 We ensure all staff are aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.
- 21.5 We ensure all staff are aware that mental health concerns are also considered as a safeguarding concern, as in some cases, it can be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.
- 21.6 Staff should pass on concerns to the DSL and follow the procedures set out in this policy.
- 21.7 Whilst we refer students to trained professionals for a diagnosis of a mental health problem, our staff are well placed to observe young adults day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.

- 21.8 Where young adults have suffered abuse, neglect, or exploitation, or other potentially traumatic adverse childhood experiences, we recognise this can have a lasting impact throughout childhood, adolescence and into adulthood.
- 21.9 Staff are aware of how these young adults' experiences, can impact on their mental health, behaviour and education.
- 21.10 If staff have a mental health concern about a child that is also a safeguarding concern, our Safeguarding procedures are followed, by speaking to the DSL.

22. Students Missing From Education

(Please also refer to our Students Missing From Education Policy)

- 22.1 Our staff will follow the college's separate procedures for dealing with young adults who go missing or have unexplained and persistent absences.
- 22.2 All staff should be aware that young adults going missing, particularly repeatedly, can act as a vital warning sign of a range of safeguarding possibilities.
- 22.3 They should act to identify any risk of abuse or neglect, including sexual abuse or exploitation. Staff are alert to signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns such as mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation or risk of forced marriage.
- 22.4 It may indicate early intervention is necessary to identify the existence of any underlying safeguarding risk and in the case of absent pupils, helps prevent the risk of them becoming a child missing education in the future.
- 22.5 The College has an admission register and an attendance register.
- 22.6 We will follow-up unexplained absences of any child with a telephone call from the college on the morning of the first day of absence and notify social services if there is an unexplained absence of more than two days of a student who is on a Child Protection Plan.
- 22.7 Wherever possible, we will hold three emergency contact details for each student to make contact with a responsible adult if necessary.
- 22.8 The college and the DSL shall also inform the applicable Local Authority of any child who has been absent without the college's permission for a continuous period of 10 college days or more, at such intervals as are agreed between the college and the Local Authority (or in default of such agreement, at intervals determined by the Secretary of State).
- 22.9 Additionally, the DSL will notify the Local Authority of any child who is going to be deleted from the Admission Register where he or she:

- Has been taken out of college by his/her parents and are being educated outside the college system e.g. home education;
- Has ceased to attend the College and no longer lives within reasonable distance of the College;
- Has been certified by a doctor as unlikely to be in a fit state of health to attend the College before ceasing to be of compulsory college age, and neither he/she nor his/her parent has indicated the intention to continue to attend the College after ceasing to be of compulsory college age;
- Is in custody for a period of more than four months due to a final court order and the College does not reasonably believe he/she will be returning at the end of the period; or has been permanently excluded.

22.10 The applicable Local Authority must be notified as soon as the grounds for deletion are met, but no later than deleting the student's name from the register. This will assist the Local Authority to fulfil its duty to identify students of compulsory college age who are missing in education and follow up with any student who might be in danger of not receiving an education and who might be at risk of abuse or neglect.

23. Notifiable Incidents

- 23.1 This is an incident involving the care of a child that meets any of the following criteria:
- A child has died (including cases of suspected suicide) and abuse or neglect is known or suspected;
 - A looked after child has died (including cases where abuse is not known or suspected);
 - A child has been seriously harmed and abuse or neglect is known or suspected;
 - A child in a regulated setting or service has died (including cases where abuse is not known or suspected).

24. Physical restraint

- 24.1 Our policy on physical restraint is compliant with the local authority's 'Physical Restraint in Colleges' guidance along with guidance from the DfE.
- 24.2 Events are recorded and signed by a witness.
- 24.3 Staff who are likely to need to use physical intervention are appropriately trained.
- 24.4 We ensure that all staff understand when it is and is not appropriate to use reasonable force, to ensure a student does not harm themselves or others and staff understand that the term 'reasonable' means using no more force than is needed.
- 24.5 We understand that physical intervention of a nature that causes injury or distress to a young adult may be considered under child protection or disciplinary procedures.

- 24.5 Where a young adult has been or alleges they have been subject to chastisement through the use of an implement or substance, this will immediately be reported for investigation to the LADO.
- 24.5 We understand that physical intervention, of a nature that causes injury or distress to a student, may be considered under child protection or disciplinary procedures.
- 24.6 Risk assessments will be carried out where individual students have additional needs or challenges that mean there is an increased likelihood of physical interventions being required and individual plans will be developed and shared/agreed with the parents/ carers.

25. Sharing of Information

- 25.1 Written notes will be kept of all incidents relating to individual students.
- 25.2 These may be shared with other agencies.
- 25.3 All contact with parents and external agencies relevant to Child Protection will be logged and kept in confidential records which are kept separate from educational records and can only be accessed by designated people within the college.
- 25.4 The content of Child Protection reports will be shared with the parents/guardians/carers in advance of any meetings.
- 25.5 Referrals made to the college are recorded on the Inter-agency Referral form.
- 25.6 All concerns, discussions and decisions made and the reason for those decisions should be recorded in writing. If in doubt about recording requirements, staff should discuss this with the DSL. As part of meeting a student's needs, we recognise we have clear powers to share, hold and use information between our professionals and local agencies and we follow procedures set out in 'Working Together to Safeguard Children.'
- 25.7 In line with KCSIE, when students leave our college, the DSL ensures their child protection file is transferred to the new college 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 college or college to have support in place for when the student arrives.
- 25.6 The designated safeguarding lead (DSL) ensures secure transit, and confirmation of receipt is to be obtained.
- 25.7 This is transferred separately from the main student file. The receiving college or college should ensure key staff such as the DSL and special educational needs co-ordinators (SENCOs) or the named persons with oversight for special educational need and disabilities (SEND) in a college are aware as required.

- 25.8 Our Data Protection Officer and DSL provide guidance to staff to ensure they are confident with processing information for safeguarding purposes and also the sharing of safeguarding information without permission where there is a good reason to do so. This may also include withholding information where the serious harm test under the legislation is met.
- 25.9 Fears about sharing information will not be allowed to stand in the way of the need to safeguard and promote the welfare of young adults. Records will include:
- A clear and comprehensive summary of the concern;
 - Details of how the concern was followed up and resolved;
 - A note of any action taken, decisions reached and the outcome. The College uses MyConcern software in support of this purpose.
- 25.10 Staff should not assume a colleague or another professional will take action and share information that might be critical in keeping young adults safe.
- 25.11 Although inter-agency working and information sharing are vital in identifying and tackling all forms of abuse, it is clear they are especially important to identify and prevent child sexual exploitation.
- 25.12 Records concerning allegations of abuse must be preserved for the term of the Independent Inquiry into Child Sexual Abuse and at least until the accused has reached normal pension age or for 10 years from the date of the allegation if it is longer.

College website safeguarding statement

- 25.13 To ensure the privacy and safety of students where young adults are named, only their first names are given.
- 25.14 Where a student is named, no photograph of that student is displayed.
- 25.15 Where a photograph is used which shows a student, no name is displayed.
- 25.16 By observing these points, the college ensures that visitors to the website cannot link images of students to the names of students.
- 25.17 When choosing photographs for the website, the college is mindful of the way students may appear in them and will not include images that are in any way inappropriate.
- 25.18 The college follows a policy of seeking parent, guardian or carer's permission before using images that show students on the website or in the local press.
- 25.19 The list showing the students who are barred from appearing in the press, or on the website, is kept in the College Office and is available whenever photographers are present.

25.20 No private information about students is published on the website such as surnames or contact details.

26. Staff Code of Conduct

26.1 Guidance is provided in the Staff Code of Conduct, David Game College Employee Handbook, and Teachers' Standards on how adults can ensure that their behaviour and actions do not place students or themselves at risk of harm or of allegations of harm to a student (for example, in one-to-one tuition, sports coaching, conveying a student by car, engaging in inappropriate electronic communication with a student, and so on).

26.2 The Staff Code of Conduct is wide-ranging and covers staff/students relationships and communications including use of social media, "breach of trust" and expands on the whistle-blowing statement in this policy.

26.3 It sets out our expectations regarding professional conduct online.

26.4 Staff must seek medical advice if they are taking medication which may affect their ability to care for young adults, and any staff medication must be securely stored and out of the reach of students at all times.

27. Organisations or Individuals Using College Premises

26.5 The colleges may receive an allegation relating to an incident that happened when an individual or organisation was using the college premises for the purposes of running activities for young adults (for example community groups, sports associations, or service providers that run extra-curricular activities).

26.5 As with any safeguarding allegation, the college will follow our safeguarding policy, including informing the LADO.

26.6 We ensure that any external organisation who is using our college site adheres to the Keeping Young adults Safe in Out-of-college Settings Guidance.

26.7 Safeguarding arrangements during mandatory college closures /remote working (such as COVID-19): the college considers safeguarding of critical importance at a time when our college is required to close and will do all it can to continue to protect its students and staff, especially those who are vulnerable. This includes arrangements for online/remote learning spaces and the monitoring of attendance to those lessons.

26.8 Whilst additional arrangements have been established, all the college's policies, rules and guidelines remain in place and adherence to all statutory guidance is expected.

- 26.9 We will incorporate any updated advice from the LA about local arrangements, including changes to contact details or referral thresholds.
- 26.10 Additional detail regarding the behaviour and conduct of both staff and students, including our arrangements for remote learning and 1:1 meetings can be found in our Safeguarding Arrangements for Remote Working Policy.

27. College Closure/Remote Working Risk Assessment

- 27.1 As part of our additional safeguarding arrangements, we have developed a 'College Closure/Remote Working' risk assessment, which identifies and addresses the risks associated with students being required to stay at home.
- 27.2 The mitigation measures devised by this risk assessment will enable the college to ensure we can, as effectively as possible, safeguard students who are not physically at the college. Although not an exhaustive list, below are some specific examples of how staff will safeguard students:

Teaching and support staff will:

- Be available during their normal working hours (either full college day or part-time as specified in their contracts) to respond to email and other appropriate work software alerts.
- Keep a register of attendance of video lessons and a log of work completed, feeding back concerns in attendance to the DSL.
- Attend any relevant meetings via telephone or video conference as requested.
- Report any safeguarding or pastoral concerns as normal through 'My Concerns' and follow-up with DSLs as usual.
- Know which students/students are vulnerable and will ensure regular contact is made both with the families and the young adult's social worker (if applicable), particularly if students are unable to physically attend college.

Senior Leadership Team will:

- Be available during their normal working hours (either full college day or part-time as specified in their contracts) to respond to email and other appropriate work software alerts.
- Establish a system to monitor safeguarding and attendance patterns and respond accordingly where there are concerns for the safety of young adults.
- Attend/chair any relevant meetings via telephone or video conference as requested.
- Inform all staff on a regular basis by email of safeguarding training or updates.
- Know which students/students are vulnerable and will ensure regular contact is made both with the families and the young adult's social worker (if applicable).
- Ensure that there is always a DSL /Deputy DSL available to contact throughout the year, in the event that a DSL is unwell.

Safeguarding students engaged in close, one-to-one teaching:

- 27.3 We recognise that young adults may be more vulnerable when working with adults in a close one-to-one teaching provision.
- 27.4 Please refer to the College Staff Code of Conduct and Teachers' Standards on how adults can ensure that their behaviour and actions do not place students or themselves at risk of harm or of allegations of harm to a student (for example, in one-to-one tuition, sports coaching, conveying a student by car, counselling and so on).
- 27.5 The Staff Code of Conduct is wide-ranging and covers staff/students' relationships (including working alone with students) and communications including the use of social media, "breach of trust" and expands on the whistle-blowing statement in this policy. The following guidance and arrangements have been taken from our Staff Behaviour (Code of Conduct) Policy which aims to safeguard students in one-to-one teaching situations:
- Staff must conduct themselves professionally in their relationships with students, parents and staff and must not behave in a way that could bring the College into disrepute or risk allegations being made.
 - No member of staff should ever be behind a locked door with a student.
 - One-to-one meetings should, wherever possible, take place in public or semi-public places such as classrooms or offices. If in classrooms, ensure you are seated so that you and the child can be seen through the visibility panel in the door.
 - When in a private meeting with a child or one-to-one session, staff should ensure furniture is positioned to allow easy access into or out of the room and that the glass panel in the door is not obscured.
 - Staff will at no time travel unaccompanied outside of the College with young adults.
 - Staff should ensure that a meeting is arranged during normal College hours when there are plenty of other people about;
 - Staff will avoid sitting or standing in close proximity to the student, except as necessary to check work.
 - Staff must report any incident that causes concern to the Designated Safeguarding Lead in accordance with the College's Child Protection Policy, and make a written record (signed and dated); and
 - report any situation where a student becomes distressed or angry to the Designated Safeguarding Lead.

28. Whistleblowing

(Please see our Whistleblowing Policy)

- 28.1 Our whistleblowing policy is integrated into training and codes of conduct.

- 28.2 We make it clear both in induction and other training and in guidance provided for staff that they have a responsibility to speak up about safeguarding and welfare matters within our college and to external agencies where necessary. This is one part of the way in which we establish in our college, a positive safeguarding culture.
- 28.3 We have an open environment and culture of safety where staff feel free to raise concerns.
- 28.4 There are procedures for reporting and handling concerns, including poor or unsafe practice and potential failures in the safeguarding regime, provision for mediation and dispute resolution where necessary.
- 28.5 Training and support are provided for staff including transparency and accountability in relation to how concerns are received and handled. The College has regard to KCSIE and as a result has clear processes for reporting and recording allegations.
- 28.6 The NSPCC whistleblowing helpline is available for staff who do not feel able to raise concerns regarding child protection failures internally. Staff can call: 0800 028 0285 or Email: help@nspcc.org.uk

29. Working in Partnership and Responding to Parents and Carers

- 29.1 Our college works in partnership with parents/guardians/carers and local authorities communicating as clearly as possible with them for the best outcomes for young adults.
- 29.2 Parents are welcome to approach the Designated Safeguarding Lead if they have any concerns about the welfare of any child in the college.
- 29.3 If preferred, parents may discuss concerns in private with the child's class teacher or the Principal who is our DSL in accordance with these procedures.

30. Reporting to the Disclosure and Barring Service (DBS) / Teaching Regulation Agency (TRA)

- 30.1 If a member of staff or volunteer tenders his or her resignation, or is dismissed and a prohibition order may be appropriate, any child protection allegations will still be followed up by the college in accordance with this policy and a referral will be made to the Disclosure and Barring Service and the TRA as soon as possible if the criteria are met.
- 30.2 Where the college dismisses or ceases to use the services of a teacher because of serious misconduct or might have dismissed them or ceased to use their services had they not left first, we will consider whether to refer the case to the Secretary of State via the Teaching Regulation Agency (TRA).

- 30.3 We also ensure that 'Compromise Agreements' or 'ACAS Agreements' never apply in such circumstances.
- 30.4 Ceasing to use a person's services includes:
- Dismissal
 - Non-renewal of a fixed-term contract
 - No longer engaging/refusing to engage a supply teacher provided by an employment agency
 - Terminating the placement of a student teacher or other trainee
 - No longer using staff employed by contractors
 - No longer using volunteers
 - Resignation; and
 - Voluntary withdrawal from supply teaching, contract working, a course of initial teacher training, or volunteering.
- 30.5 We would ensure that such reports include as much evidence about the circumstances of the case as possible.
- 30.6 We would never use 'Compromise agreements' to prevent a referral being made to the DBS when it is legally required, nor an individual's refusal to cooperate with an investigation.
- 30.7 The Proprietor is also under a duty to consider making a referral to the TRA where a teacher has been dismissed (or would have been dismissed had he/she not resigned) and a prohibition order may be appropriate. The Proprietor delegates this duty to the college Principal.
- 30.8 The reasons such an order would be considered are:
- Unacceptable professional conduct
 - Conduct that may bring the profession into disrepute; or
 - Conviction, at any time, for a relevant offence

31. Monitoring and Review

- 31.1 This policy is subject to continuous monitoring, refinement, and audit by the Senior Leadership Team (SLT) which includes the Designated Safeguarding Lead (DSL) and Deputy Designated Safeguarding Lead/Principal (DDSL).
- 31.2 The external supervision of the DSL is by the Chair of our Governance Advisory Board.
- 31.3 The Proprietor, and the Principal will undertake a full annual review of this policy and procedures, inclusive of its implementation and the efficiency with which the related duties have been discharged.
- 31.4 The Proprietor recognises the expertise staff build by undertaking safeguarding training and managing safeguarding concerns. As such, staff can contribute to and shape our safeguarding arrangements and child protection policy.

- 31.5 Any deficiencies or weaknesses recognised in arrangements or procedures will be remedied immediately and without delay.
- 31.6 All staff will be informed of the update/review, and it is made available to them in either a hard copy or electronically.
- 31.7 This policy will be reviewed and agreed by the Governance Advisory Board at the college for Autumn 2024 and will next be reviewed no later than Autumn 2025 or earlier if significant changes to the systems and arrangements take place, or if legislation, regulatory requirements or best practice guidelines so require.

Appendix 1 - Types And Signs Of Abuse, Neglect, and Exploitation Including Possible Indicators

Types of Abuse and Neglect Including Specific Safeguarding Issues

We are aware that abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap with one another. Abuse may take place wholly online, or technology may be used to facilitate offline abuse. Issues could include: *physical abuse; neglect (physical or emotional); peer abuse; extremism/radicalisation; domestic violence; drug/alcohol abuse; emotional abuse; abuse of trust; young adults who sexually abuse; witnessing, hearing, or experiencing domestic abuse or violence; child sexual exploitation (CSE); child exploitation and online safety; student sexual exploitation; female genital mutilation (FGM); forced marriages; fabricated or induced illness; faith abuse; safeguarding disabled young adults; disability and vulnerability; honour-based violence vulnerable groups; bullying including cyberbullying; vulnerable students; young adults in need; child missing education (young adults who run away or go missing); child missing from home or care; missing young adults and adults strategy; young carers; cared for young adults and significant harm; gangs and youth violence; gender-based violence/violence against women and girls (VAWG); hate; mental health; private fostering; homeless; family members in prison; preventing radicalisation; teenage relationship abuse; sexting; trafficking.* Expert and professional organisations are best placed to provide up-to-date guidance and practical support on specific safeguarding issues. For example, NSPCC offers information for colleges and colleges on the TES website and also on its own website www.nspcc.org.uk/preventing-abuse/ and other government websites.

PHYSICAL ABUSE: The nature of 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. Most young adults collect cuts and bruises quite routinely as part of the rough and tumble of daily life. Clearly it is not necessary to be concerned about most of these minor injuries. But accidental injuries normally occur on the *bony prominences* e.g. shins. Injuries on the *soft* areas of the body are more likely to be inflicted intentionally. If a body map is to be used to record physical abuse, they should only be used to record observed injuries and no child should be asked to remove clothing by a member of staff of the college.

Indicators of physical abuse/factors that should increase concern include:

- multiple bruising or bruises and scratches/bi-lateral injuries (especially on the head and face including around the mouth); clusters of bruises – e.g. fingertip bruising (caused by being grasped); bruises around the neck and behind the ears – the most common abusive injuries are to the head;
- marks indicating injury by an instrument – e.g. linear bruising (stick), parallel bruising (belt), marks of a buckle;
- bite marks; deliberate burning may also be indicated by the pattern of an instrument or object - e.g. electric fire, cooker, cigarette; scalds with upward splash marks or *tide marks*; untreated injuries; injuries to genital areas;
- recurrent injuries, burns or bald patches; having broken bones or unexplained bruising, burns or welts in different stages of healing; being unable to explain an injury, or providing explanations that are inconsistent, vague or unbelievable.
- If a child has an injury to which they cannot explain, where the parent or child is apparently secretive or evasive or if the explanation does not appear to match the injury.

EMOTIONAL ABUSE: Definition of 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 valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on young adults. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. This can also occur when a child is a young carer for a parent who is disabled, has mental health problems or misuses alcohol or drugs. It may involve seeing or hearing the ill treatment of another, for example where there is fighting or violence in the home. It may involve serious bullying (including cyberbullying), causing young adults frequently to feel frightened or in danger, or the exploitation or corruption of young adults. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur

alone. Emotional abuse may involve serious bullying, including cyberbullying. Our staff are provided with [guidance regarding cyberbullying](#).

The nature of emotional abuse: Most harm is produced in *low warmth, high criticism* homes, not from single incidents. Emotional abuse is chronic and cumulative and has a long-term impact. All kinds of abuse, neglect, and exploitation have emotional effects although emotional abuse can occur by itself. Witnessing someone harming another person – as in domestic violence, can harm young adults. It is sometimes possible to spot emotionally abusive behaviour from parents and carers to their young adults, by the way that the adults are speaking to, or behaving towards young adults. An appropriate challenge or intervention could affect positive change and prevent more intensive work being carried out later on.

Indicators of emotional abuse: Developmental issues include delays in physical, mental and emotional development; poor college performance and speech disorders, particularly sudden disorders or changes.

Behaviour: acceptance of punishment which appears excessive; over-reaction to mistakes; continual self-deprecation (I'm stupid, ugly, worthless etc.); neurotic behaviour (such as rocking, hair-twisting, thumb sucking); self-mutilation; suicide attempts; drug/solvent abuse; running away; compulsive stealing, scavenging; acting out; poor trust in significant adults; regressive behaviour – e.g. wetting; eating disorders; destructive tendencies; neurotic behaviour; arriving early at college, leaving late.

Social issues: withdrawal from physical contact or from social interaction; over-compliant behaviour or insecure, clinging behaviour; poor social relationships.

Emotional responses: extreme fear of new situations; inappropriate emotional responses to painful situations (“I deserve this”); fear of parents being contacted; self-disgust; unusually fearful with adults; lack of concentration, restlessness, aimlessness; extremes of passivity or aggression; excessive need for approval, attention and affection.

NEGLECT is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs. Far more young adults are registered to the category of neglect on child protection plans than to the other categories. Neglect is a difficult form of abuse to recognise and is often seen as less serious than other categories. It is, however, very damaging: young adults who are neglected often develop more slowly than others and may find it hard to make friends and fit in with their peer group. Neglect is often noticed at a stage when it does not pose a risk to the child. The duty to safeguard and promote the welfare of young adults would suggest that an appropriate intervention or conversation at this early stage can address the issue and prevent a child continuing to suffer until it reaches a point when they are at risk of harm or in significant need. Neglect is often linked to other forms of abuse, so any concerns college staff have should at least be discussed with the DSL.

Indicators of neglect: The following is a summary of some of the indicators that may suggest a child is being abused or is at risk of harm. It is important to recognise that indicators alone cannot confirm whether a young adult is being abused. Each young adult should be seen in the context of their family and wider community and a proper assessment carried out by appropriate persons. What is important to keep in mind is that if you feel unsure or concerned, do something about it. Don't keep it to yourself.

Physical indicators of neglect include: constant hunger and stealing food; poor personal (including dental) hygiene – unkempt, dirty or smelly; being underweight; wearing dress unsuitable for weather; poor state of clothing; illness or injury untreated and looking sad, false smiles.

Behavioural indicators of neglect include: constant tiredness; frequent absence from college or lateness; or arriving early at college/leaving late; missing medical appointments; becoming isolated among peers; being frequently unsupervised; stealing or scavenging, especially food and having destructive tendencies, poor relationships with peers; running away.

SEXUAL ABUSE: The nature of sexual abuse: Sexual abuse is often perpetrated by people who are known and trusted by the young adult – e.g. relatives, family friends, neighbours, babysitters, and people working with the child in college, faith settings, clubs or activities. 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 oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving young adults in looking at, or in the production of, sexual images, watching sexual activities, encouraging young adults to behave in sexually inappropriate ways, or grooming a young adult in preparation for abuse (including via the internet). Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse can be committed by anybody, including women and young adults as well as adult males. Where it comes to our notice that a student under the age of 13 is, or may be, sexually active, this will result in an immediate referral to Young adults' Services and advice being given to the DSL. This will determine how and when information will be shared with parents/guardians/carers and the investigating agencies.

Characteristics of Child Sexual Exploitation and abuse: it is often planned and systematic – people do not sexually abuse young adults by accident, through sexual abuse can be opportunistic; grooming the child – people who abuse young adults take care to choose a vulnerable young adult and often spend time making them dependent; grooming the child's environment – abusers try to ensure that potential adult protectors (parents and other carers especially) are not suspicious of their motives.

Indicators of sexual abuse: Physical observations include damage to genitalia, anus or mouth; sexually transmitted diseases; unexpected pregnancy, especially in very young girls; soreness in genital area, anus or mouth and other medical problems such as chronic itching; unexplained recurrent urinary tract infections and discharges or abdominal pain. The concerns listed are not exhaustive. Staff can and should also record and report other concerns about a child, such as general welfare concerns.

Child Criminal Exploitation (CCE) and Child Sexual Exploitation (CSE): The college recognises that different forms of harm often overlap, and that perpetrators may subject young adults and young people to multiple forms of abuse, such as criminal exploitation (including county lines) and sexual exploitation. Staff recognise that CCE can often be facilitated by technology, including the targeting of young people via social media or the provision of devices in exchange for or to support criminal activity. 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. Young adults can be exploited by adult males or females, as individuals or in groups. They may also be exploited by other young adults, who themselves may be experiencing exploitation – where this is the case, it is important that the child perpetrator is also recognised as a victim. Whilst the age of the child may be a contributing factor for an imbalance of power, there are a range of other factors that could make a child more vulnerable to exploitation, including gender, sexual identity, cognitive ability, learning difficulties, communication ability, physical strength, status, and access to economic or other resources. Some of the following can be indicators of both child criminal and sexual exploitation where young adults:

- appear with unexplained gifts, money or new possessions;
- associate with other young adults involved in exploitation;
- suffer from changes in emotional well-being;
- misuse drugs and alcohol;
- go missing for periods of time or regularly go home late; and
- regularly miss college or education or do not take part in education.

We recognise that Young adults who have been exploited will need additional support to help maintain them in education . CSE can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence. We draw on support from the [Multi-Agency practice Principles for Responding to Child Exploitation](#) to help tackle child exploitation.

Some additional specific indicators that may be present in CSE are young adults who:

- have older boyfriends or girlfriends; and
 - suffer from sexually transmitted infections, display sexual behaviours beyond expected sexual development or become pregnant.
- Further information on signs of a child's involvement in sexual exploitation is available in Home Office guidance: [Child sexual exploitation: guide for practitioners](#).

Appendix 2: - Specific Safeguarding Issues

Our staff are aware of safeguarding issues - some of which are listed below. They are aware that behaviours linked to the likes of drug taking, alcohol abuse, truanting and sexting put young adults in danger. Our staff are aware safeguarding issues can manifest themselves via child-on-child abuse. This is most likely to include, but not limited to: bullying (including Cyber Bullying), gender-based violence/sexual assaults and sexting.

CHILD-ON-CHILD ABUSE: Our staff are clear as to the College's policy and procedures with regards to child-on-child abuse and we follow KCSIE and WTTSC. See paragraph '**Concerns and allegations of abuse made against other young adults (Child-on-child Abuse) inclusive of sexting and banter**' for the procedures we take to minimise the risk of child-on-child abuse and how allegations will be investigated and dealt with.

Youth produced sexual imagery (Sexting) - Please refer to our Sexual Violence and Sexual Harassment Policy: The practice of young adults sharing images and videos via text message, email, social media or mobile messaging apps has become commonplace. The DfE provides [searching screening and confiscation advice for colleges](#). The UK Council for Child Internet Safety (UKCCIS) Education Group has recently published [Sharing nudes and semi-nudes: advice for education settings working with young adults and young people](#). However, this online technology has also given young adults the opportunity to produce and distribute sexual imagery in the form of photos and videos. Such imagery involving anyone under the age of 18 is illegal. Youth produced sexual imagery refers to both images and videos where a person under the age of 18:

- creates and shares sexual imagery of themselves or by another person under the age of 18 or an adult or
- is in possession of sexual imagery created by another person under the age of 18.

All incidents of this nature should be treated as a safeguarding concern and in line with the guidance 'Sexting in colleges: responding to incidents and safeguarding young people'. Cases where the sexual imagery is of a person under 18, is child sexual abuse and should be responded to accordingly.

If a member of staff becomes aware of an incident involving youth produced sexual imagery they should follow the child protection procedures and refer to the DSL as soon as possible. The member of staff should confiscate the device involved and set it to flight mode or, if this is not possible, turn it off. Staff should not view, copy or print the youth produced sexual imagery. The parent(s)/carer(s) should be informed, unless there is reason to believe that this would put the young adult at risk of harm. A referral should be made to Children's Social Care or the Police as appropriate. Immediate referral should be made to Children's Social Care/Police if:

- the incident involves an adult, the imagery involves sexual acts; the imagery involves anyone aged 12 or under;
- there is good reason to believe that a young person has been coerced, blackmailed or groomed or if there are concerns about their capacity to consent (for example, owing to special education needs);
- what you know about the imagery suggests the content depicts sexual acts which are unusual for the child's development stage or are violent;
- there is reason to believe a child is at immediate risk of harm owing to the sharing of the imagery, for example the child is presenting as suicidal or self-harming.
- If none of the above applies then the DSL will consider whether:
- there is a significant age difference between the sender/receiver;
- there is any coercion or encouragement beyond the sender/receiver;
- the imagery was shared and received with the knowledge of the child in the imagery;
- the child is more vulnerable than usual i.e. at risk;
- there is a significant impact on the young adults involved;
- the image is of a severe or extreme nature;
- the child involved understands consent;
- the situation is isolated or if the image has been more widely distributed;
- there are other circumstances relating to either the sender or recipient that may add cause for concern i.e. difficult home circumstances or
- the young adults have been involved in incidents relating to youth produced imagery before.

If any of these circumstances are present the situation will be escalated according to our child protection procedures, including reporting to the police or Children's Social Care. Otherwise, the situation will be managed within the college. The DSL will record all incidents of youth produced sexual imagery, including both the actions taken, actions not taken, reasons for doing so and the resolution in line with safeguarding recording procedures. This guidance reflects the UKCCIS Guidance. https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/551575/6.2439KGNC_Sexting_in_Colleges

Removal of sexual images/videos: If the incident involves sexual images or videos that have been made and circulated online, the victim can be supported to get the images removed through the [Internet Watch Foundation \(IWF\)](#). The IWF will make an assessment of whether the image is illegal in line with UK Law. If the image is assessed to be illegal, it will be removed and added to the IWF's Image Hash list.

Upskirting: 'Upskirting' is where someone takes a picture under a person's clothing (not necessarily a skirt) without their permission and or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is a criminal offence. Anyone of any gender, can be a victim.

CHILD ABDUCTION AND COMMUNITY SAFETY INCIDENTS: Child abduction is the unauthorised removal or retention of a minor from a parent or anyone with legal responsibility for the child. Child abduction can be committed by parents or other family members; by people known but not related to the victim (such as neighbours, friends and acquaintances); and by strangers. Other community safety incidents in the vicinity of a college can raise concerns amongst young adults and parents, for example, people loitering nearby or unknown adults engaging young adults in conversation. As young adults get older and are granted more independence (for example, as they start walking to college on their own) it is important they are given practical advice on how to keep themselves safe. We provide outdoor-safety lessons/assemblies to our students, to help combat this risk, focusing on building young adults' confidence and abilities rather than simply warning them about all strangers. Further information is available at: www.actionagainstabduction.org and www.clevernevergoes.org.

CHILD CRIMINAL EXPLOITATION: COUNTY LINES: County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs using dedicated mobile phone lines or other form of "deal line". This activity can happen locally as well as across the UK - no specified distance of travel is required. Young adults and vulnerable adults are exploited to move, store and sell drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims.

Young adults can be targeted and recruited into county lines in a number of locations including colleges (mainstream and special), further and higher educational institutions, student referral units, young adults' homes and care homes. Young adults are also increasingly being targeted and recruited online using social media. Young adults can easily become trapped by this type of exploitation as county lines gangs can manufacture drug debts which need to be worked off or threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network. A number of the indicators for CSE and CCE as detailed above may be applicable to where young adults are involved in county lines. Some additional specific indicators that may be present where a child is criminally exploited through involvement in county lines are young adults who:

- go missing and are subsequently found in areas away from their home;
- have been the victim or perpetrator of serious violence (e.g. knife crime);
- are involved in receiving requests for drugs via a phone line, moving drugs, handing over and collecting money for drugs;
- are exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection;
- are found in accommodation that they have no connection with, often called a 'trap house or cuckooing' or hotel room where there is drug activity;
- owe a 'debt bond' to their exploiters or
- have their bank accounts used to facilitate drug dealing.

The college has access to guidance published by the Home Office: [County Lines Toolkit for Professionals](#)

MODERN SLAVERY AND THE NATIONAL REFERRAL MECHANISM: Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs. Further information on the signs that someone may be a victim of modern slavery, the support available to victims and how to refer them to the NRM is available in the Modern Slavery Statutory Guidance. [Modern slavery: how to identify and support victims](#)

YOUNG ADULTS AND THE COURT SYSTEM: The College recognises that young adults are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. There are two age appropriate guides to support young adults [5-11-year olds](#) and [12-17 year olds](#). They explain each step of the process and support and special measures that are available. There are diagrams illustrating the courtroom structure and the use of video links is explained. Making child arrangements via the family courts following separation can be stressful and entrench conflict in families. We recognise this can be stressful for young adults. The Ministry of Justice has launched an online [child arrangements information tool](#) with clear and concise information on the dispute resolution service and this may be useful for some parents and carers.

YOUNG ADULTS ABSENT FROM EDUCATION: All staff should be aware that young adults being absent from college, particularly repeatedly and/or for prolonged periods, and young adults missing education can act as a vital warning sign of a range of safeguarding possibilities. This may include abuse and neglect, which may include sexual abuse or exploitation and can also be a sign of child criminal exploitation including involvement in county lines. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation, 'honour'- based abuse or risk of forced marriage. Early intervention is necessary to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child going missing in future. Staff receive training on the college's unauthorised absence and young adults missing from education procedures.

YOUNG ADULTS WITH FAMILY MEMBERS IN PRISON: Approximately 200,000 young adults have a parent sent to prison each year. These young adults are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. Our staff use information provided by [NICCO](#) to support any students who have parents in prison, to help mitigate negative consequences for those young adults.

CYBERCRIME: Cybercrime is criminal activity committed using computers and/or the internet. It is broadly categorised as either 'cyber-enabled' (crimes that can happen off-line but are enabled at scale and at speed on-line) or 'cyber dependent' (crimes that can be committed only by using a computer). We take advice to ensure that our security procedures for our IT infrastructure are effective and should staff have concerns about a child's involvement with cybercrime, they will refer this to the DSL, who may contact the [Cyber Choices Programme](#). We also ensure our systems meet the [Cyber Security Standards](#) – set out by the DfE.

HONOUR-BASED ABUSE (including Female Genital Mutilation and Forced Marriage): So-called 'honour-based' abuse (HBA) encompasses crimes which have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation (FGM), forced marriage, and practices such as breast ironing. All forms of so-called HBA are abuse (regardless of the motivation) and should be handled and escalated as such. If in any doubts staff should speak to the designated safeguarding lead. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBA, or already having suffered HBA.

Indicators of Honour-based abuse: Guidance on the warning signs that FGM or forced marriage may be about to take place, or may have already taken place, can be found on pages 38-41 of the [Multi agency statutory guidance on FGM](#) (pages 59-61 focus on the role of colleges and colleges) and pages 13-14 of the [Multi-agency guidelines: Handling cases of forced marriage](#).

Actions if HBA is suspected: If staff have a concern regarding a child that might be at risk of HBA they should activate local safeguarding procedures, using existing national and local protocols for multiagency liaison with Police and Young adults' Services. In the social context of the college, it is normal to ask about a noticeable injury. The response to such an enquiry is generally light-hearted and detailed. So, most of all, concern should be increased when: the explanation given does not match the injury; the explanation uses words or phrases that do not match the vocabulary of the child (adults words); no explanation is forthcoming; the child (or the parent/carer) is secretive or evasive or the injury is accompanied by allegations of abuse or assault. **We become concerned if the young person** is reluctant to have parents/carers contacted; runs away or shows fear of going home; is aggressive towards themselves or others; flinches when approached or touched; is reluctant to undress to change clothing for sport; wears long sleeves during hot weather; is unnaturally compliant in the presence of parents/carers; has a fear of medical help or attention or admits to a punishment that appears excessive.

FEMALE GENITAL MUTILATION (FGM): This comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences.

Circumstances/symptoms that may point to FGM happening include:

- a young adult is talking about getting ready for a special ceremony; a young adult's family taking a long trip abroad;

- a young adult's family being one of the 'at risk' communities for FGM (Kenya, Somalia, Sudan, Sierra Leon, Egypt, Nigeria, Eritrea as well as non-African communities including Yemeni, Afghani, Kurdistan, Indonesia and Pakistan);
- knowledge that a sibling has undergone FGM; a young adult is talking about going abroad to be 'cut' or to prepare for marriage;
- difficulty in walking, sitting or standing; spending lengthier time in the bathroom/toilet than usual;
- unusual behaviour after a college absence/reluctance to undertake usual medical examinations and
- asking for help, but not detailing the problem in full due to fear or embarrassment.

Mandatory reporting duty: Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a statutory duty upon **teachers** along with regulated health and social care professionals in England and Wales, to report to the Police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Those failing to report such cases will face disciplinary sanctions. It will be rare for teachers to see visual evidence, and they should not be examining students, but the same definition of what is meant by "to discover that an act of FGM appears to have been carried out" is used for all professionals to whom this mandatory reporting duty applies.

Teachers **must** personally report to the Police cases where they discover that an act of FGM appears to have been carried out. Unless the teacher has a good reason not to, they should also still consider and discuss any such case with the college DSL and involve Young Adults' Services as appropriate. The duty does not apply in relation to at risk or suspected cases (i.e. where the teacher does not discover that an act of FGM appears to have been carried out, either through disclosure by the victim or visual evidence) or in cases where the woman is 18 or over. In these cases, teachers should follow local safeguarding procedures.

FORCED MARRIAGE: Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. It is also a crime to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday, even if violence, threats or another form of coercion are not used. As with the existing forced marriage law, this applies to non-binding, unofficial 'marriages' as well as legal marriages. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some perpetrators use perceived cultural practices to coerce a person into marriage. The College can play an important role in safeguarding young adults from forced marriage.

The Forced Marriage Unit (FMU) has created: Multi-agency practice guidelines: handling cases of forced marriage (pages 75-80 of which focus on the role of colleges and colleges) and, Multi-agency statutory guidance for dealing with forced marriage, which can both be found at The right to choose: government guidance on forced marriage - GOV.UK (www.gov.uk) College staff can contact the Forced Marriage Unit if they need advice or information: Contact: 020 7008 0151 or email fmu@fcdo.gov.uk.

HOMELESSNESS: Being homeless or being at risk of becoming homeless presents a real risk to a young adult's welfare. Our designated safeguarding lead and deputy DSL are aware of contact details and referral routes in to the Local Housing Authority so they can raise/progress concerns at the earliest opportunity. Staff are alert to the signs that families of students may be at risk of homelessness and these may include household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property. Whilst referrals and or discussion with the Local Housing Authority should be progressed as appropriate, this does not, and should not, replace a referral into Children's Social Care where a young adult has been harmed or is at risk of harm.

The Homelessness Reduction Act 2017 places a new legal duty on English councils so that everyone who is homeless or at risk of homelessness will have access to meaningful help including an assessment of their needs and circumstances, the development of a personalised housing plan, and work to help them retain their accommodation or find a new place to live. The following factsheets usefully summarise the new duties: [Homeless Reduction Act Factsheets](#). The new duties shift focus to early intervention and encourage those at risk to seek support as soon as possible, before they are facing a homelessness crisis.

GANGS AND YOUTH VIOLENCE: We will endeavour to protect our young adults and young people from exposure to gang activity and exploitation by having robust attendance and behaviour policies and to act on relevant information or allegations. We will take all reports seriously and will share this information appropriately with other agencies to safeguard our students from harm.

DOMESTIC VIOLENCE AND ABUSE: The current government definition of *domestic violence and abuse* (DVA) is: '*Any incident or pattern of incidents of controlling, coercive or threatening behaviour, violence or abuse between those aged 16 or over who are or have been intimate partners or family members regardless of sex or sexuality. This can encompass, but is not limited to, the following types of abuse: psychological; physical; sexual; financial; emotional*'.

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. Young adults can be victims of domestic 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 which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn. If a member of staff is concerned that domestic abuse is occurring within a family or relationship they should inform the DSL who will consider a referral to Young Adults' Services and/or the Police as necessary.

In some cases, a young adult may blame themselves for the abuse or may have had to leave the family home as a result. Domestic abuse affecting young people can also occur within their personal relationships, as well as in the context of their home life. Where there is evidence of domestic violence, we will report our concerns to the appropriate agency including Children's Social Care and the police in order to prevent the likelihood of any further abuse taking place. Advice on identifying young adults who are affected by domestic abuse and how they can be helped is available at: [NSPCC- UK domestic-abuse Signs Symptoms Effects](#)

[Refuge what is domestic violence/effects of domestic violence on young adults Safe lives: young people and domestic abuse](#)

We have close links with the Metropolitan Police force, through [Operation Encompass](#), who liaise with the college on matters of domestic violence, also providing advice for staff who may be concerned about young adults who have experienced domestic abuse. The helpline is available 8AM to 1PM, Monday to Friday on 0204 513 9990

BULLYING - Please also refer to our anti-bullying (Countering Bullying) Policy which sets out our procedures in order to prevent bullying and to deal with it if and when it occurs within the college. This may be defined as deliberate, repeated (systematic) aggressive verbal, psychological or physical conduct by an individual or group against another person or persons. Very often bullying is the act of oppressing or dominating by threat or force where the aggressor may persecute or tease physically or morally in order to frighten into action or inaction. Bullying can include:

- Physical: pushing, hitting, kicking, pinching etc.
- Verbal: name-calling, spreading rumours, constant teasing and sarcasm.
- Emotional: tormenting, ridiculing, humiliating, ignoring.
- Racial: taunts, graffiti and gestures; Religious /cultural.
- Sexual, sexist or homophobic: unwanted physical contact or abusive comments.
- Cyber-bullying: through social networking websites, mobile phones and text messages, photographs and email.

Signs that may indicate bullying:

- Behavioural changes such as reduced concentration, becoming withdrawn, depressed, tearful, emotionally up and down, reluctance to go to college etc.; a marked drop off in performance at college.
- Physical signs such as stomach aches, headaches, difficulties in sleeping, bingeing on food, cigarettes or alcohol and a shortage of money or frequent loss of possessions.

SELF-HARM AND SUICIDAL BEHAVIOUR: Self-harm can be deliberate with the aim of a young adult just causing themselves an injury, attempted suicide which does not result in end of life or a successful attempt to end life resulting in death. Majority of self-harmers keep it a secret that goes undiscovered, finding it is the only way to express their feelings. Young adults self-harm for many reasons including: being bullied both at college or online, mental health issues, eating disorders, domestic abuse, any type of abuse, parental conflict and bereavement. The signs of the distress the young adult may be under can take many forms and can include:

- cutting behaviours and self-poisoning, other forms of self-harm, such as burning, scalding, banging, hair pulling; not looking after their needs properly emotionally or physically;
- direct injury such as scratching, cutting, burning, hitting yourself, swallowing or putting things inside;
- staying in an abusive relationship, taking risks too easily, eating distress (anorexia and bulimia);
- addiction for example, to alcohol or drugs and low self-esteem and expressions of hopelessness.

During a disclosure of self-harm, staff should check whether the student has ingested anything or has anything on their person that could cause damage or harm. Any concerns from staff members should be referred to the DSL, as an early help assessment may need to be completed to involve services that can help, or in the case of significant harm a referral can be made to Young Adults' Services.

PRIVATE FOSTERING ARRANGEMENTS: A private fostering arrangement occurs when someone other than a parent or close relative cares for a child for a period of 28 days or more, with the agreement of the child's parents. It applies to young adults under the age of 16 or 18 if the child is disabled. Young adults looked after by the Local Authority or who are placed in residential colleges, young adults' homes or hospitals are not considered to be privately fostered. Private fostering occurs in all cultures, including British culture and young adults may be privately fostered at any age.

The College recognises that most privately fostered young adults remain safe and well but are aware that safeguarding concerns have been raised in some cases. Therefore, all staff are alert to possible safeguarding issues, including the possibility that the young adult has been trafficked into the country. By law, a parent, private foster carer or other persons involved in making a private fostering arrangement must notify young adults' services as soon as possible. However, where a member of staff becomes aware that a student may be in a private fostering arrangement they will raise this with the DSL and the DSL will notify Young Adults' Services of the circumstances.

LOOKED AFTER YOUNG ADULTS: The most common reason for young adults becoming looked after is as a result of abuse, neglect, and exploitation. The college ensures that staff have the necessary skills and understanding to keep looked after young adults safe. Appropriate staff have information about a young adult's looked after legal status and care arrangements, including the level of authority delegated to the carer by the authority looking after the young adult and contact arrangements with birth parents or those with parental responsibility. The designated teacher and Member of the Governance Advisory Board for looked after young adults will have the appropriate level of training to equip them with the knowledge and skills to undertake their role. The designated teacher for looked after young adults and the DSL have details of the young adult's social worker and the name and contact details of the Head of Virtual College.

TRAFFICKED YOUNG ADULTS: Child trafficking involves moving young adults across or within national or international borders for the purposes of exploitation. Exploitation includes young adults being used for sex work, domestic work, restaurant/ sweatshop, drug dealing, shoplifting and benefit fraud. Where the College is made aware of a young adult suspected of or actually being trafficked/exploited, including being in Private Fostering, the DSL will report our concerns to Children's Social Care.

RADICALISATION: KCSIE define radicalisation as 'the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups'. Extremism is vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. We also include in our definition of extremism calls for the death of members of our armed forces, whether in this country or overseas.' There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. It can happen in many different ways and settings. Specific background factors may contribute to vulnerability which are often combined with specific influences such as family, friends or online, and with specific needs for which an extremist or terrorist group may appear to provide an answer. The internet and the use of social media in particular has become a major factor in the radicalisation of young people.

It is possible to protect vulnerable people from extremist ideology and intervene to prevent those at risk of radicalisation being radicalised. As with other safeguarding risks, staff should be alert to changes in young adults' behaviour which could indicate that they may be in need of help or protection. Staff should use their judgement in identifying young adults who might be at risk of radicalisation and act proportionately which may include the designated safeguarding lead (or deputy) making a referral to the [Channel programme](#).

The above list is not exhaustive and as new policy guidance and legislation develops within the remit of Safeguarding we will review and update our policy as appropriate and in line with the Local Safeguarding Children Partnership and Local Authority to ensure our college is a safe place to learn and work.

Appendix 3 – Main Responsibilities of the Principal/DSL, Deputy DSL and Governance Advisory Board:

Main Responsibilities of the DSL: Our Governance Advisory Board ensures that a member of the Senior Leadership Team, is appointed to the role of the DSL and has the appropriate status and authority within our college to carry out the duties of the post including maintaining an overview of safeguarding within the college, to open channels of communication with local statutory agencies and to monitor the effectiveness of policies and procedures in practice. The Deputy DSL will act as DSL in their absence and otherwise will carry out safeguarding tasks and duties as specified by the DSL in accordance with the details set down below.

The DSL takes **lead responsibility** for safeguarding and child protection (including online safety and understanding the filtering and monitoring systems and processes in place). The DSL has the additional time, funding, training, resources and support to provide advice and support to other staff on child welfare and child protection matters, to take part in strategy discussions and interagency meetings – and/or to support other staff to do so – and to contribute to the assessment of young adults. If the DSL is unavailable these duties will be carried out by the Deputy DSL. Whilst the activities of the designated safeguarding lead may be delegated appropriately to the DDSL, the ultimate **lead responsibility** for child protection, as set out above, inclusive of online safety, remains with the DSL, and this should not be delegated.

Availability: During term time, our designated safeguarding lead (or a deputy) is always available (during college hours) for staff in the college to discuss any safeguarding concerns, either in person or via phone/video call. The college will organise adequate and appropriate cover arrangements for any out of hours/out of college time activities including when the college is closed.

Managing Referrals includes: The DSL is expected to:

- refer cases of suspected abuse to the Local Authority Children's Social Care as required, the LADO for child protection allegations which concern a member of staff or volunteer, the Disclosure and Barring Service where a person is dismissed or left due to risk/harm to a child and/or the police if a crime may have been committed;
- support staff who make referrals to Local Authority Children's Social Care and the Channel programme;
- refer cases to the Channel programme where there is a radicalisation concern as required;
- refer cases where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service as required;
- refer cases where a crime may have been committed to the Police as required. NSPCC- [When to call the police](#) gives guidance on when to consider calling the police and what to expect when working with the police.

Work 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 three safeguarding partners; MASH, the local NHS commissioning group and Metropolitan Police
- liaise with the Principal to inform them of issues- especially ongoing enquiries under section 47 of the Children's Act 1989 and police investigations (including the requirement for young adults to have an Appropriate Adult) - [PACE Code C 2019](#)
- as required, liaise with the "case manager" (as per Part four) 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, and the special educational needs co-ordinator (SENCO), on matters of safety and safeguarding and welfare (including online and digital safety): when deciding whether to make a referral by liaising with relevant agencies and so that young adults' needs are considered holistically;
- liaise with the senior mental health lead and, where available, the Mental Health Support Team, where safeguarding concerns are linked to mental health;
- promote supportive engagement with parents and/or carers in safeguarding and promoting the welfare of young adults, including where families may be facing challenging circumstances;
- promote educational outcomes by knowing the welfare, safeguarding and child protection issues that young adults in need are experiencing, or have experienced, and is therefore best placed to identify the impact that these issues might be having on young adults' attendance, engagement and achievement at college;
- ensuring that the college knows who its cohort of young adults who currently need a social worker are, understanding their academic progress and attainment, and maintaining a culture of high aspirations for this cohort; and,

- support teaching staff to feel confident to provide additional academic support or make reasonable adjustments to help young adults who need or have needed a social worker reach their potential, recognising that even when statutory social care intervention has ended, there is still a lasting impact on young adults' educational outcomes.

Undertake training, which includes: The DSL and deputy DSL undergo specialist training to be updated every 2 years (including prevent awareness training). In addition, they continually (and at least annually) refresh their knowledge and skills in order to keep up with any developments relevant to their role (this might be through e-bulletins, meeting other DSLs or reading new safeguarding developments) in order to:

- understand the assessment process for providing early help and intervention, for example through locally agreed common and shared assessment processes such as early help assessments and social care referral arrangements;
- have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so;
- Understand the filtering and monitoring systems the college has in place, ensuring they are compliant with the [Filtering and Monitoring Standards](#) and reviewing these regularly to ensure effectiveness.
- understand when a crime may have been committed and at what stage to contact the police. ([When to call the Police \(NSPCC\)](#));
- are able to understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep young adults safe whilst they are online at the college;
- can recognise the additional risks that young adults with SEN and disabilities (SEND) face online, for example, from online bullying, grooming and radicalisation and are confident they have the capability to support SEND young adults to stay safe online;
- ensure each member of staff has access to and understands the college's child protection policy and procedures, especially new and part time staff; are alert to the specific needs of young adults in need, those with special needs and young carers; are able to keep detailed, accurate, secure written records of concerns and referrals;
- understand and support the college with regards to the requirements of the Prevent duty and are able to provide advice and support to staff on protecting young adults from the risk of radicalisation;
- obtain access to resources and attend any relevant or refresher training courses and
- encourage a culture of listening to young adults and taking account of their wishes and feelings, among all staff, in any measures the college may put in place to protect them.

Information sharing and managing the child protection file: The designated safeguarding lead is responsible for ensuring that child protection files are kept up to date and stored securely. They should ensure the file is only accessed by those who need to see it and where the file or content within it is shared, this happens in line with information sharing advice as set out in Part one and Part two of (KCSIE: Currently in force).

Where young adults leave the college (including in year transfers) the designated safeguarding lead will ensure their child protection file is transferred to the new college 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. This will be transferred separately from the main student file, ensuring secure transit, and confirmation of receipt should be obtained. Receiving colleges and colleges should ensure key staff such as designated safeguarding leads and SENCOs or the named person with oversight for SEN in colleges, are aware as required. Lack of information about their circumstances can impact on the child's safety, welfare and educational outcomes. In addition to the child protection file, the designated safeguarding lead will also consider if it would be appropriate to share any additional information with the new college or college in advance of a child leaving in order to help them put in place the right support to safeguard this child and to help the child thrive in the college or college. For example, information that would allow the new college or college to continue supporting young adults who have had a social worker and been victims of abuse and have that support in place for when the child arrives.

Raising Awareness – The Designated Safeguarding Lead will:

- ensure the college's child protection policies are known, understood and used appropriately;
- ensure the college's child protection policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with the proprietor and the Governance Advisory Board regarding this;
- ensure the child protection policy is available publicly and parents are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the college in this;
- 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 young adults, including young adults with a social worker, are experiencing, or have experienced, with teachers and college

leadership staff. Their role could include ensuring that the college, and their staff, know who these young adults are, understand their academic progress and attainment and maintain a culture of high aspirations for this cohort; supporting teaching staff to identify the challenges that young adults in this group might face and the additional academic support and adjustments that they could make to best support these young adults.

Training, knowledge and skills: The designated safeguarding lead and deputy undergo training to provide them with the knowledge and skills required to carry out the role. This training is updated at least every two years. The designated safeguarding lead undertakes Prevent awareness training. This training provides the designated safeguarding leads with a good understanding of their own role, and the processes, procedures and responsibilities of other agencies, particularly Children's Social Care, so they:

- understand the assessment process for providing early help and statutory intervention, including local criteria for action and Local Authority Children's Social Care referral arrangements;
- have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so;
- ensure each member of staff has access to, and understands, the college's child protection policy and procedures, especially new and part time staff;
- are alert to the specific needs of young adults in need, those with special educational needs and disabilities (SEND), those with relevant health conditions and young carers;
- understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the General Data Protection Regulation;
- understand the importance of information sharing and with the three safeguarding partners, other agencies, organisations and practitioners;
- are able to keep detailed, accurate, secure written records of concerns and referrals;
- understand and support the college with regards to the requirements of the Prevent duty and are able to provide advice and support to staff on protecting young adults from the risk of radicalisation;
- are able to understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep young adults safe whilst they are online at college;
- can recognise the additional risks that young adults 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 young adults with SEND to stay safe online;
- obtain access to resources and attend any relevant or refresher training courses and
- encourage a culture of listening to young adults and taking account of their wishes and feelings, among all staff, in any measures the college may put in place to protect them.

In addition to the formal training set out above, we give time for their knowledge and skills be refreshed (this might be via e- bulletins, meeting other designated safeguarding leads, or through reading and digesting safeguarding developments) at regular intervals, as required, and at least annually, supporting the DSLs' understand and keeping up with any developments relevant to their role.

Understanding processes and procedures: Training should provide designated safeguarding leads with a good understanding of their own role, and the processes, procedures and responsibilities of other agencies, particularly Children's Social Care, in order to:

- understand the assessment process for providing early help and statutory services, including local criteria for action and Local Authority Children's Social Care referral arrangements;
- have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so; and
- understand the importance of the role the designated safeguarding lead has in providing information and support to young adults social care in order to safeguard and promote the welfare of young adults.

Providing support to staff: Training should support the designated safeguarding lead in developing expertise, so they can support and advise staff and help them feel confident on welfare, safeguarding and child protection matters. This includes specifically to:

- ensure each member of staff has access to, and understands, the college's child protection policy and procedures, especially new and part time staff;
- ensure that staff are supported during the referrals processes and
- support staff to consider how safeguarding, welfare and educational outcomes are linked, including to inform the provision of academic and pastoral support.

Holding and sharing information: The critical importance of holding, using and sharing information effectively is set out in (Parts one and two of KCSIE: Currently in force), and therefore the designated safeguarding lead should be equipped to:

- understand the importance of information sharing, both within the college, and with other colleges and/or colleges on transfer including in-year and between primary and secondary education, and with the three safeguarding partners, other agencies, organisations and practitioners;
- understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the General Data Protection Regulation and
- be able to keep detailed, accurate, secure written records of concerns and referrals and understand the purpose of this record-keeping.

Responding to specific needs and harms: Training should give the designated safeguarding lead the knowledge and skills to identify, understand and respond to specific needs that can increase the vulnerability of young adults, as well as specific harms that can put young adults at risk. This includes to:

- be alert to the specific needs of young adults in need, those with special educational needs and disabilities (SEND), those with relevant health needs and young carers;
- understand the lasting impact that adversity and trauma can have, including on young adults' behaviour, mental health and wellbeing, and what is needed in responding to this in promoting educational outcomes;
- understand and support the college with regard to the requirements of the Prevent duty and be able to provide advice and support to staff on protecting young adults from the risk of radicalisation;
- understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep young adults safe whilst they are online at college and
- recognise the additional risks that young adults with special educational needs and disabilities (SEND) face online, for example, from online bullying, grooming and radicalisation and be confident they have the capability to support young adults with SEND to stay safe online.

Proprietor and Governance Advisory Board: The Governance Advisory Board, who receive from the DSL a safeguarding report at each meeting has a corporate responsibility for all safeguarding matters relating to the students of the college. This includes specific responsibilities for ensuring that all who are employed, supply services or volunteer at the college, are informed of the content of this policy and any reviews and updates. To this end, the Governance Advisory Board will:

- liaise with the senior leadership of the college, the DSL and Deputy DSL, holding them to account on matters relating to safeguarding and also liaise with the LSCP and LADO as and when required by this policy;
- with the DSL, jointly produce the written annual review/audit and report where the minutes are sufficiently detailed to demonstrate both the breadth and the depth of the review, which is shared with the Local Authority;
- check the staff's understanding and implementation of the policy, ensuring that they are all aware of the referral process and how to implement safeguarding protocols; monitor the policy, procedures and the efficiency with which they are implemented;
- ensure that there are clear job specifications for the DSL and Deputy DSL who have the knowledge, skills and understanding necessary to keep safe young adults who are looked after by a Local Authority;
- find out, on each visit to the college, if the policy is known in practice by talking to a number of staff and volunteers right across the college to see if they would know who to go to in the case of a suspected abuse and what they would do in terms of comments they might make to the young adult;
- review how young adults are taught about safeguarding, including online, through the curriculum and PSHCE
- ensure the college contributes to interagency working in line with the Working Together to Safeguard Children (WtSC) (HM Government: currently in force) through effective communication and cooperation with local agencies.

The Principal and the DSL will:

- ensure that the safeguarding and child protection policy and procedures adopted by the Governance Advisory Board are implemented and followed by all staff;
- allocate sufficient time and resources to enable the DSL and Deputy DSL to carry out their roles effectively, including the assessment of students and attendance at strategy discussions and other necessary meetings;
- ensure that all staff feel able to raise concerns about poor or unsafe practice and that such concerns are handled sensitively.

Reporting wrongdoing by staff in the workplace that does not involve safeguarding and welfare of students is dealt with in accordance with the college's Whistleblowing procedures and

- provide immunity from retribution or disciplinary action against staff in the event of them 'whistleblowing' in good faith; ensure that student's safety and welfare are addressed through the curriculum and be able to understand safer recruitment procedures and processes and deal with allegations against members of staff and volunteers.

Appendix 4 - The Role Of The Local Authority Designated Officer (LADO)

The role of the LADO is set out in *Working Together to Safeguard Children (2018)* and is governed by the Authorities duties under section 11 of the Children Act 2004 and ESSCP Inter-Agency Policy and Procedures. This guidance outlines procedures for managing allegations against people who work with young adults who are paid, unpaid, volunteers, casual, agency or anyone self-employed, including those involving the LADO, in conjunction with the police. The LADO must be contacted within one working day in respect of all cases in which it is alleged that a person who works with young adults has:

- behaved in a way that has harmed, or may have harmed a child;
- possibly committed a criminal offence against or related to a child or
- behaved towards a child or young adults in a way that indicates they may pose a risk of harm to young adults.

There may be up to three strands in the consideration of an allegation:

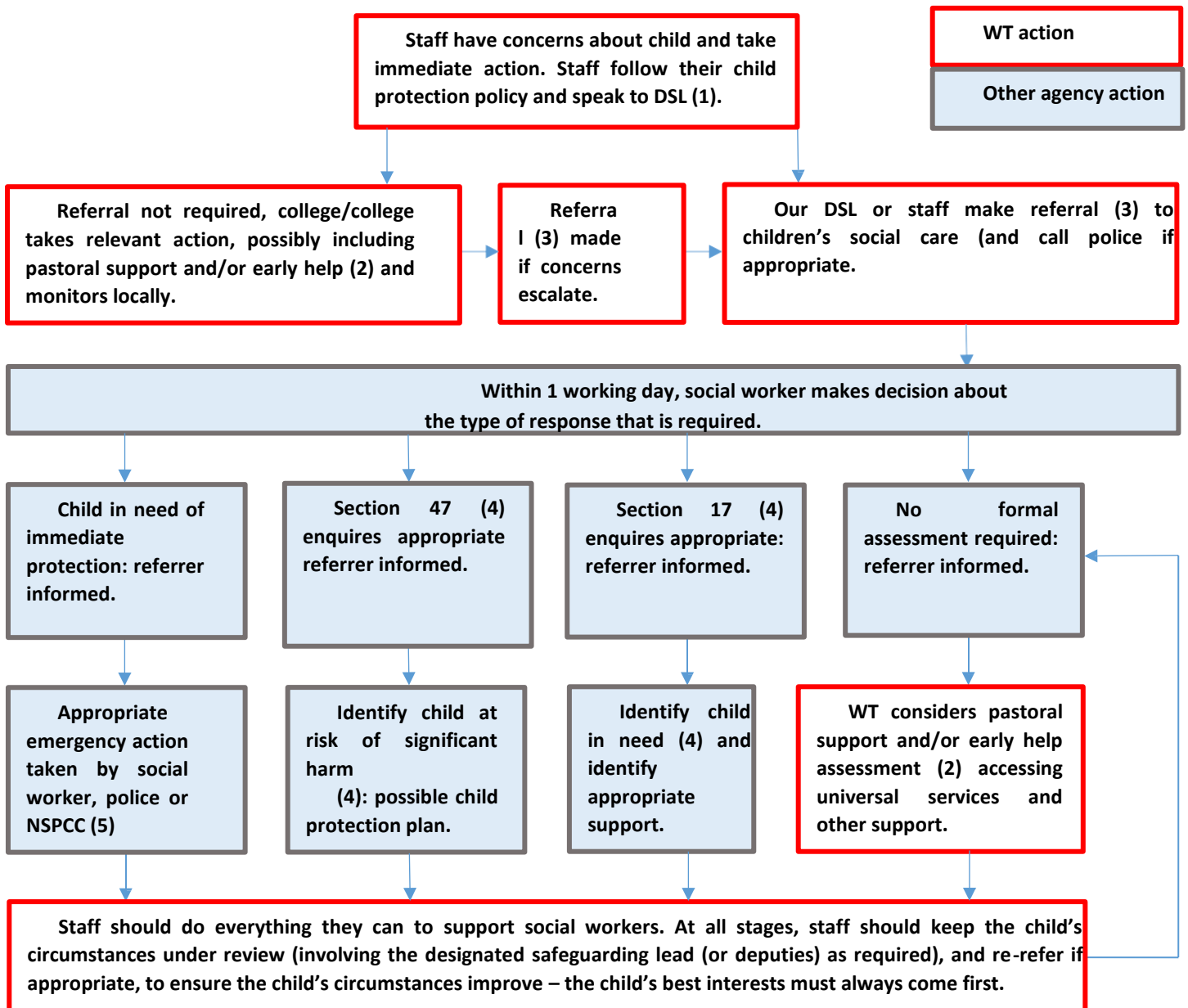
- a police investigation of a possible criminal offence;
- enquiries and assessment by Children's Social Care about whether a young adult is in need of protection or in need of services and
- consideration by an employer of disciplinary action in respect of the individual.

The LADO is responsible for:

- Providing advice, information and guidance to employers and voluntary organisations around allegations and concerns regarding paid and unpaid workers.
- Managing and overseeing individual cases from all partner agencies.
- Ensuring the young adult's voice is heard and that they are safeguarded.
- Ensuring there is a consistent, fair and thorough process for all adults working with young adults and young people against whom an allegation is made.
- Monitoring the progress of cases to ensure they are dealt with as quickly as possible.
- Recommending a referral and chairing the strategy meeting in cases where the allegation requires investigation by police and/or social care.

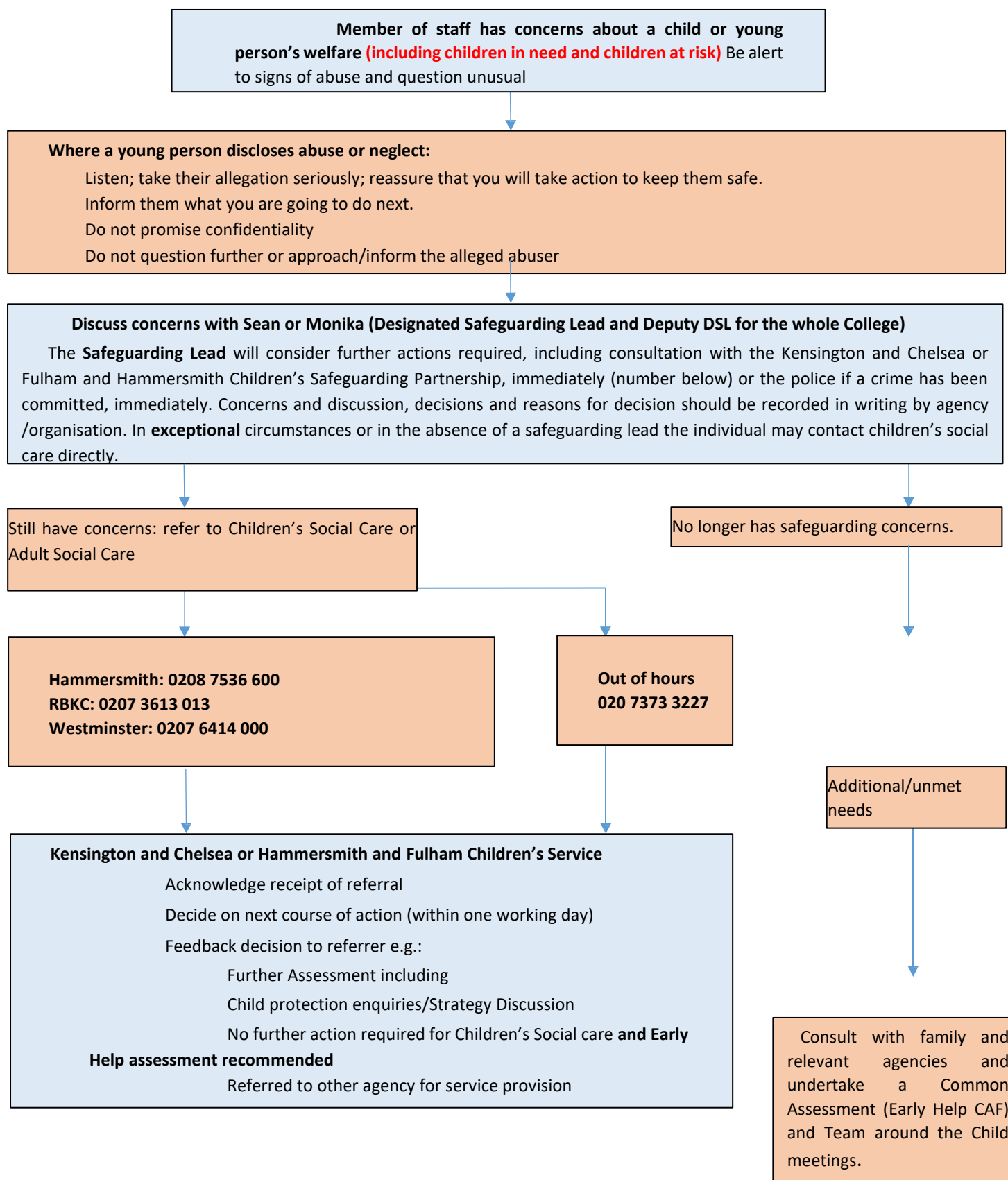
The LADO is involved from the initial phase of the allegation through to the conclusion of the case. The LADO is available to discuss any concerns and to assist the college in deciding whether there is a need to make a referral and/or take any immediate management action to protect a young adult.

Appendix 5 – Actions Required By KCSIE Where There Are Concerns About A Child



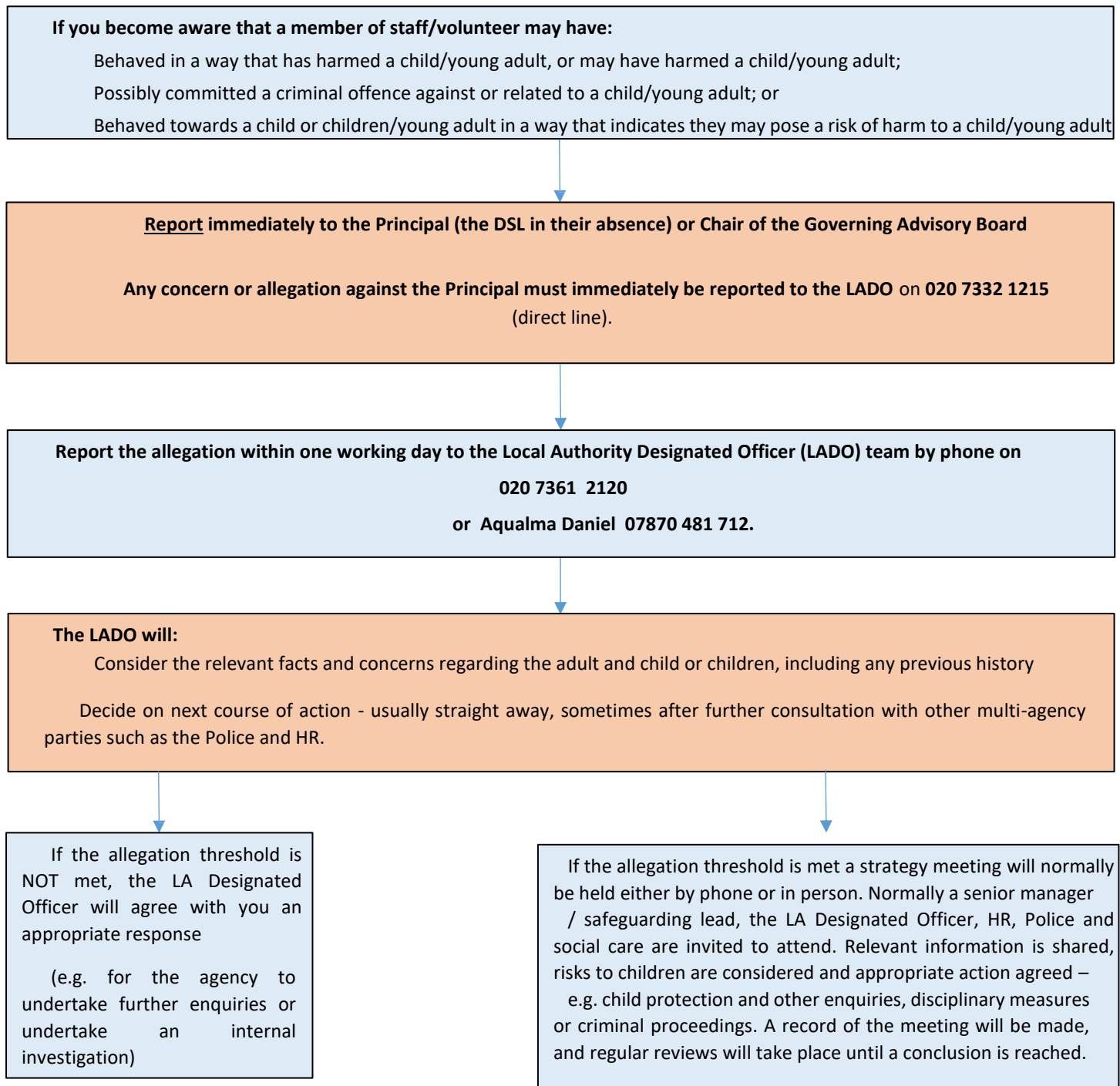
1. In cases which also involve a concern or an allegation of abuse against a staff member, see Part Four of this guidance.
2. Early help means providing support as soon as a problem emerges at any point in a child's life. Where a child would benefit from co-ordinated early help, an early help inter-agency assessment should be arranged. Chapter one of Working Together to Safeguard Children provides detailed guidance on the early help process.
3. Referrals should follow the process set out in the local threshold document and local protocol for assessment Chapter One of Working Together to Safeguard Children.
4. Under the Young adults Act 1989, local authorities are required to provide services for young adults in need for the purposes of safeguarding and promoting their welfare. Young adults in need may be assessed under section 17 of the Young adults Act 1989. Under section 47 of the Young adults 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 enquiries to decide whether to take action to safeguard or promote the child's welfare. Full details are in Chapter One of Working Together to Safeguard Children.
5. This could involve applying for an Emergency Protection Order (EPO).

APPENDIX 6 - WHAT TO DO IF YOU ARE WORRIED A CHILD IS BEING ABUSED OR NEGLECTED



Appendix 7 - Allegations Against Adults/College Staff/Volunteers

Risk of Harm to Students



Keeping Children Safe in Education (DfE: currently in force) makes it clear that anybody can make a direct referral to Children's Social Care (CSC) including the LADO and other external agencies

Ownership and consultation	
Document author (name)	Sean Doherty, Principal

Audience	
Audience	Principal, college staff, Governance Advisory Board, students, and parents

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