



Safeguarding Policy (incorporating Child Protection and Prevent)

PURPOSE OF POLICY/ DOCUMENT

Heart of Worcestershire College fully recognises its responsibilities in safeguarding learners. This policy is relevant to all students and staff employed by the College and all agencies and visitors that have access to learners through the college.

This policy has been developed in accordance with the principles established by the Children Acts 1989 and 2004; the Education Act 2002; and in line with government publications the Teachers' Standards 2012, 'Working Together to Safeguard Children' 2018 and 'Keeping Children Safe in Education' September 19.

APPLICATION OF POLICY (RANGE AND SCOPE)

This policy covers all learners, prospective learners, visitors, staff and stakeholders.

INTERPRETATION

'Young Person' refers to someone who is over the school leaving age of 16 years and under 18 years. This Policy does not apply to 14 – 16-year-old learners who fall under the jurisdiction of the school which they attend and the local authority policies relating to that age group.

'Vulnerable Adult' refers to a person who is aged 18 years and over, who is or may be, unable to take care of him or herself, or take steps to protect him or herself from significant harm or exploitation.

Child Protection is a part of safeguarding and promoting welfare. It refers to the activity that is undertaken to protect specific children/young people who are suffering, or are likely to suffer, significant harm.

Staff refers to all those working for or on behalf of the college, full or part time, temporary or permanent, in either a paid or voluntary capacity.

Parents refers to birth parents and other adults who are in a parenting role, for example step-parents, foster carers and adoptive parents.

PARTICULAR LEGAL REQUIREMENTS/ISSUES

The college has a duty of care to all of its learners, but particular responsibilities to those under 18 years, and those who are vulnerable adults. There are five main elements to the policy:

- Raising awareness of safeguarding issues and equipping young people and vulnerable adults with the skills needed to keep them safe;
- Developing and implementing procedures for identifying and reporting safeguarding cases;
- Supporting young people and vulnerable adults who have been identified as in need of early help or at risk of harm and those presenting with safeguarding concerns.

- Establishing a safe environment in which young people and vulnerable adults can learn and develop.
- Ensuring Heart of Worcestershire College practices safer recruitment in checking the suitability of staff to work with young people and vulnerable adults.

Relevant Legislation

Children Act 1989/2004
 Safeguarding Vulnerable Groups Act 2006
 The United Nations Convention on the Rights of the Child 1991
 The Human Rights Act 1998
 GDPR 2018
 The Education Act 1996/2002/2011
 Children and Social Work Act 2017.
 Equality Act 2010
 The Protection of Freedoms Act 201
 Sexual Offences Act 2003
 Working Together to Safeguard Children 2018
 Keeping Children Safe in Education September 2020
 Sexual Harassment and sexual violence advice 2018
 Peer on Peer Abuse Guidance 2018
 Missing Children and Adults Strategy
 Female Genital Mutilation Act 2003
 Homelessness Reduction Act 2017
 The Counter-Terrorism and Security Act 2015
 Section 175 of the Education Act 2002
 The Rehabilitation of Offenders Act 1974

LINKS WITH OTHER POLICIES/DOCUMENTS

Student Standards	Data Protection GDPR policy	Search and Restraint Policy
Prevent strategy	Whistleblowing procedure	Criminal convictions procedure
Disciplinary Policy and Procedure (staff)	Equality Policy	Health and Safety Policy
Professional Code of Standards for Staff	Visiting External Speakers Policy	Fitness to Study Procedures
Email and Internet Policy for Governors, Staff and Students	Recruitment and Selection of Staff Policy	Managing Allegations Policy

EQUALITY, DIVERSITY AND DISABILITY (DISABILITY, EQUALITY, DUTY IMPACT ASSESSMENT)

Has a preliminary Equality Impact Assessment been completed?

*Yes No Yes Date Completed:

Is a full Impact Assessment required?

*Yes No No

If 'yes', has a copy been sent to the Equality Manager?

*Yes No

For Completion by the Executive:

DOCUMENT REFERENCE CODE	SAF02
CATEGORY	Safeguarding
AUTHOR / ORIGINATOR (Job Title)	Vice Principal Information Systems and Student Experience
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REVIEW FREQUENCY (Yrs)	Annually
REVIEW DATE	October 2021
POSTHOLDER RESPONSIBLE FOR REVIEW (Job Title)	Vice Principal Information Systems and Student Experience
SIGNIFICANT CHANGE? (Delete as applicable)	Yes
IF YES, STATE COMMITTEE & DATE OF APPROVAL	Corporation

Statement relating to ongoing ratification College's Safeguarding Policy.

The College adopts the model Policy from Worcestershire Children First and adapts it for practice at Heart of Worcestershire College ensuring that any guidance and legislation changes are incorporated. Due to the changes that may be required to the policy during the academic year, the Governing Body have agreed that the policy will be formally agreed and ratified annually at the Autumn Governor Meeting. The Governing Body have agreed that if WCF make changes made to the model policy during the year, or if new guidance specially relating to safeguarding is issued, the College's safeguarding lead will adapt the policy for the College, review it with the Safeguarding Governor, and then the College will formally adopt the policy at this point.

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**Designated Safeguarding Lead (DSL)
Prevent Single Point of Contact (SPOC)
CSE single point of contact**

**Julia Breakwell
Vice Principal Information
Systems and Student Experience**

Deputy Designated Safeguarding Lead:	Sal Friel, Student Engagement Manager
Early Years Safeguarding Deputy:	Emma Lockwood (W) Kyrene Bowes (B)
Safeguarding Governor:	Lucy Hodgson
Designated teacher for children in care:	Debbie Bird, Wellbeing and Safeguarding Officer

‘Safeguarding’ is defined as:

- protecting children/young people from maltreatment;
- preventing impairment of children's/young people's health or development;
- ensuring that children/young people are growing up in circumstances consistent with the provision of safe and effective care;
- taking action to enable all children/young people to have the best possible outcome.

Abuse may be physical, sexual or psychological. Whilst abusers may be relatives or friends of the family, some meet children, young people and vulnerable adults in other contexts. A small minority of these may gain access to children/young people in schools/colleges as teachers, support staff or through voluntary involvement in enrichment activities. Students should not feel inhibited from reporting abuse against them by staff or volunteers. Any incident where a student has grounds to believe that a member of staff has crossed the boundary of acceptable behaviour should be reported. The College will continue to ensure that the environment encourages students and staff to make truthful reports of any inappropriate behaviour. Handling allegations, particularly serious ones, is a complex and delicate process. In addition, failure to address bullying or racist incidents in College may lead to consideration under safeguarding learners' procedures.

Safeguarding incidents and/or behaviours can be associated with factors outside the school or college and/or can occur between children outside the school or college.

This is known as **contextual safeguarding**, which simply means assessments of children should consider whether wider environmental factors are present in a child's life that are a threat to their safety and/or welfare.

Any fears or worries that children, young people and vulnerable adults bring into the College should not go unnoticed by staff but should be reported immediately and in confidence to the Designated Senior Lead (DSL) or the Deputy Designated Senior Lead.

COVID-19

Keeping Children Safe in Education (KCSIE) remains in force throughout the response to Coronavirus (COVID-19).

The Department for Education has issued non-statutory interim guidance on safeguarding in schools, colleges and other providers during the coronavirus outbreak. This guidance supports governing bodies, proprietors, senior leadership teams and designated safeguarding leads to continue to have appropriate regard to KCSIE and keep their children safe. It suggests where schools and colleges might consider the safeguarding policy and processes differently when compared to business as usual.

<https://www.gov.uk/government/publications/covid-19-safeguarding-in-schools-colleges-and-other-providers>

1. Safeguarding Procedures

The college will follow the procedures set out by the Worcestershire Safeguarding Children Partnership (WSCP) in line with Keeping Students Safe in Education 2020 and take account of any guidance issued by the Department for Education (DfE). The College will:

- Ensure that a senior member of staff is appropriately trained and has designated duties to act as the Designated Senior Lead for Safeguarding. This is the Vice Principal Information Systems and Student Experience. The DSL will ensure that Safeguarding policies and procedures are fully implemented and followed by all staff. The Student Engagement Manager will act in the absence of the DSL as the Deputy DSL.
- Ensure that the DSL will co-ordinate action on safeguarding and promoting the welfare of young people and vulnerable adults with the support of the Deputy DSL and the College Safeguarding Team, ensuring that all staff, volunteers and visitors to the College know who the DSL is, understands their role and who acts in his/her absence.
- Ensure that the DSL/Deputy DSL have made arrangements to ensure adequate and appropriate cover arrangements are in place when they are not available or for out of hours activities.
- Ensure that there is a nominated Safeguarding Governor.
- Ensure that staff and volunteers are aware of their responsibilities in being alert to the signs of abuse and neglect including the specific issues of Female Genital Mutilation (FGM), Child Sexual Exploitation (CSE) Radicalisation and Extremism (Prevent) and Sexual Violence & Sexual Harassment and of their responsibility to report and record any concerns to the DSL or the Principal and that they may raise concerns directly with Children's Social Care Services if they believe their concerns have not been listened to or acted upon.
- Ensure that the duty of care towards students and staff is promoted by raising awareness of illegal, unsafe and risky behaviour and assist staff to monitor their own standards and practice;
- Ensure that parents/guardians have an understanding of the responsibility placed on the College and staff for safeguarding by publishing our policy on the college website.
- Ensure that partner organisations are aware of and understand the need for compliance with our safeguarding guidelines and procedures.

- Be aware of and follow procedures set out by the DfE and the Worcestershire Safeguarding Children's Partnership where an allegation is made against a member of staff or volunteer, including making a referral to the Local Authority Designated Officer (LADO). Ensure that a referral is made to DBS and/or the National College for Teaching and Leadership if a person in regulated activity has been dismissed or removed due to safeguarding concerns or would have been had they not resigned. Please see the Managing Allegations Policy for further guidance.
- Operate safer recruitment practice, ensuring that at least one member on every recruitment panel has completed safer recruitment training.
- Ensure that all staff and volunteers feel able to raise concerns about poor or unsafe practice and are aware of whistleblowing procedures and helplines.
- In instances that feature particularly high-risk elements, the DSL will engage in 'priority dialogue' with the Principal and CEO and/or the Deputy Principal in his/her absence, in order to come to an organisational position.
- Ensure that the Safeguarding policy and procedures are reviewed annually by the Corporation, unless an incident or new legislation or guidance requires the need for an interim review.

2. Training Guidelines

- 2.1 When staff join the College they will be informed of the safeguarding arrangements in place. They will be given a copy of this policy, the Professional Code of Standards for Staff, Annex A of Keeping Children Safe in Education and informed who the DSL is and who acts in their absence and what this role includes.
- 2.2 All staff are required to undertake a mandatory training session on safeguarding within their probationary period. The training programme will include basic child protection information relating to signs and symptoms of abuse, how to manage a disclosure from a young person or vulnerable adult, when and how to record a concern about the welfare of a young person or vulnerable adult, e-safety and advice on safe working practices. Full training will be refreshed at least every 3 years. In addition, they will receive safeguarding and child protection updates as required, but at least annually and safeguarding information will be shared on the safeguarding tile held on the staff portal.
- 2.3 All volunteers, agency staff and regular visitors to the college will be told where to access our policy, given the name of the DSL and Deputy and informed of the College's procedures in reporting concerns.
- 2.4 Staff with specific responsibility for safeguarding will undertake both single and inter-agency training at a level suitable to their role and responsibilities. In addition to formal training the DSL and deputy will update their knowledge and skills via WSCP briefings, network meetings and seminars, at regular intervals, at least annually.
- 2.5 Staff with leadership responsibilities will undertake further relevant training in safeguarding related issues such as CSE, FGM, Radicalisation (WRAP training), Sexual Violence and Sexual Harassment, Management of Allegations of Abuse and cascade the learning from this training to the rest of the staff.

3. Responsibilities of Heart of Worcestershire College

- 3.1 **The Governing Body** will nominate a member to have responsibility for liaising with the DSL and or the Principal in matters relating to safeguarding, to ensure that;
- Safeguarding policies and procedures are in place, available to parents on the college website or by other means and reviewed annually;

- Mechanisms are in place to assist staff to understand and discharge their role and responsibilities as set out in Part one of Keeping Children Safe in Education;
- An annual report on the effectiveness of the College's safeguarding procedures is presented to the governing body;
- Any weaknesses brought to its attention relating to safeguarding are remedied without delay.
- The DSL and Deputy DSL role is explicit in the postholders' job descriptions;
- Any returns requested by the Local Authority/Worcestershire Safeguarding Children's Partnership (e.g. s175 audit, CSE audit) are completed in a timely manner to enable the WSCP to meet its statutory duties
- It complies with all legislative duties, including the duty to report suspected or known cases of FGM and the duty to prevent young people being drawn into terrorism.
- The College contributes to inter-agency working in line with statutory guidance.
- Effective policies and procedures are in place and updated annually including a behaviour "code of conduct" for staff and volunteers

The Principal will ensure that:

- The safeguarding policies and procedures are fully implemented and followed by all staff and that sufficient resources are allocated to enable the DSL and other staff to discharge their responsibilities with regard to child protection.
- All staff feel able to raise concerns about poor or unsafe practice and that these are handled sensitively and in accordance with the whistleblowing procedures;
- All allegations of abuse by staff are reported to the LADO in a timely manner.
- All staff are made aware that they have an individual responsibility to pass on safeguarding concerns and that if all else fails to report these directly to Children's Social Care (Children's Services) or the Police.

The DSL

Governing bodies and proprietors should ensure an appropriate senior member of staff, from the college leadership team, is appointed to the role of designated safeguarding lead. The designated safeguarding lead should take lead responsibility for safeguarding and child protection. This should be explicit in the role-holder's job description.

Whilst the activities of the designated safeguarding lead can be delegated to appropriately trained deputies, the ultimate lead responsibility for safeguarding and child protection, as set out above, remains with the designated safeguarding lead. This responsibility should not be delegated.

The designated safeguarding lead and any deputies should liaise with the three safeguarding partners and work with other agencies in line with Working Together to Safeguard Children and NPCC- When to call the police. This should help designated safeguarding leads understand when they should consider calling the police and what to expect when they do.

During term time, the designated safeguarding lead and/or a deputy should always be available (during college hours) for staff in the college to discuss any safeguarding concerns. It is a matter for the College and the designated safeguarding lead to arrange adequate and appropriate cover arrangements for any out of hours/out of term activities.

The designated safeguarding lead and any deputies should undergo training to provide them with the knowledge and skills required to carry out the role. The training should be updated every two years. (WCF Education Safeguarding SLA -DSL annual training)

In addition to their formal training as set out above, their knowledge and skills should be updated (for example via e-bulletins, meeting other designated safeguarding leads, or taking time to read and digest safeguarding developments), at regular intervals, and at least annually, to keep up with any developments relevant to their role.

The DSL will co-ordinate action on safeguarding and promoting the welfare of young people and vulnerable adults within the College setting. The DSL, with the support of the Deputy DSL and College Safeguarding Team, is responsible for:

- Organising mandatory safeguarding training and for all newly appointed staff and regular refresher training sessions to enable staff to update as required;
- Providing a mechanism to ensure that all staff understand and are able to discharge their role and responsibilities as set out in Part one of Keeping Children Safe in Education; and ensure the College's child protection policies are known, understood and used appropriately;
- Providing information to the WSCP/Local Authority on safeguarding and child protection in compliance with section 14B of the Children Act 2004.
- Undertaking, in conjunction with the Principal and Safeguarding Governor, an annual audit of safeguarding procedures, using the County safeguarding checklist;
- Referring a young person or vulnerable adult to the Family Front Door, Children's Social Care or Adult Social Care as appropriate, when there are concerns about possible abuse and neglect; Understanding the assessment process for providing early help and make use of the Levels of Need guidance when making a decision about whether or not the threshold for Early Help or Social Care intervention is met;
- Referring a young person to the Channel Panel when there are concerns about possible radicalisation or involvement in extremist groups;
- Keeping written records of concerns about young people and vulnerable adults, even where there is no need to refer the matter immediately;
- Ensuring all child protection records are kept securely and in locked locations;
- Ensuring that all child protection files are transferred in a safe and timely manner when a young person or vulnerable adult moves settings, both between and across phases, within and out of county and that a receipt of transfer is obtained;
- Notifying the key worker if there is an unexplained absence of more than two days of a young person who is subject to a child protection plan;
- Monitoring unauthorised absence, particularly where young people or vulnerable adults go missing on repeated occasions;
- Developing effective links with relevant agencies and other professionals and co-operate as required with their enquiries regarding safeguarding matters including co-operation with serious case reviews, attendance at strategy meetings, initial and review child protection conferences, core group and child in need review meetings;
- Contributing to assessments and providing reports to initial and review conferences which, where appropriate, have been shared with parents first;

- Assess risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online at College;
- Encourage a culture of listening to children/young people and taking account of their wishes and feelings, among all staff;
- Act as a source of support, advice and expertise for all staff.
- Liaise with the HR Manager in relation to DBS referrals that are required in regard to staff, further to allegations and investigation outcomes.
- Act as a source of advice and expertise for managers/HR undertaking investigations into safeguarding matters which relate to staff conduct.

4. Procedures for Managing Concerns

- 4.1 Our College adheres to child protection procedures that have been agreed locally through Safeguarding Worcestershire <https://www.safeguardingworcestershire.org.uk> Where we identify children and families in need of support, we will carry out our responsibilities in accordance with the West Mercia Consortium inter-agency procedures and the WSCP Levels of Need Guidance. Every member of staff, including volunteers working with students at our college, is advised to maintain an attitude of '*it could happen here*' where safeguarding is concerned. When concerned about the welfare of a student or member of staff, staff members should always act in the interests of the student/member of staff and have a responsibility to take action as outlined in this policy. They should not assume a colleague or another professional will take action and share information that might be critical in keeping children/young people safe;
- 4.2 All staff are encouraged to report any concerns that they have and not see these as insignificant. On occasions, a referral is justified by a single incident such as an injury or disclosure of abuse. More often however, concerns accumulate over a period of time and are evidenced by building up a picture of harm over time; this is particularly true in cases of emotional abuse and neglect. In these circumstances, it is crucial that staff record and pass on concerns in accordance with this policy to allow the DSL/Deputy DSL to build up a picture and access support for the student at the earliest opportunity. A reliance on memory without accurate and contemporaneous records of concern could lead to a failure to protect.
- 4.3 It is *not* the responsibility of College staff to investigate welfare concerns or determine the truth of any disclosure or allegation. All staff, however, have a duty to recognise concerns and pass the information on in accordance with the procedures outlined in this policy.
- 4.4 The Designated Safeguarding Lead (DSL) or Deputy DSL should be used as a first point of contact for concerns and queries regarding any safeguarding concern in the College. Any member of staff or visitor to the school who receives a disclosure of abuse or suspects that a student is at risk of harm must report it immediately to the DSL or, if unavailable, to the deputy designated lead. In the absence of either of the above, the matter should be brought to the attention of a member of the Safeguarding Team.
- 4.4 Following receipt of any information raising concern, the DSL/Deputy DSL will consider what action to take and seek advice from Children's Social Care as required. All information and actions taken, including the reasons for any decisions made, will be fully documented.
- 4.5 All referrals will be made in line with local procedures as detailed on the Worcestershire Children First website. If, at any point, there is a risk of immediate serious harm to a student a referral should be made to Children's or Adult Social Care Services immediately. Anybody can make a referral. If the student's situation does not appear to

be improving the staff member with concerns should press for re-consideration by raising concerns again with the DSL/Deputy DSL.

- 4.6 Staff should always follow the reporting procedures outlined in this policy in the first instance. However, they may also share information directly with Children's or Adult Social Care Services, or the police if: the situation is an emergency and the designated senior person, their deputy and the Principal are all unavailable; they are convinced that a direct report is the only way to ensure the student's safety.'
- 4.7 Any member of staff who does not feel that concerns about a student have been responded to appropriately and in accordance with the procedures outlined in this policy should raise their concerns with the Principal or the Chair of Governors. If any member of staff does not feel the situation has been addressed appropriately at this point, they should contact Children's or Adult Social Care Services directly with their concerns.

5. Children Missing from Education

- 5.1 All staff should be aware that children/young people going missing, particularly repeatedly, can act as a vital warning sign of a range of safeguarding possibilities.
- 5.2 This may include abuse and neglect, which may include sexual abuse or exploitation and child criminal exploitation. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation or risk of forced marriage.
- 5.3 Early intervention is necessary to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child/young person going missing in future. Attendance, absence and exclusions are closely monitored.
- 5.4 Appropriate action including notifying the local authority particularly where children go missing on repeat occasions and/or are missing for periods during the college day in conjunction with 'Children Missing Education: Statutory Guidance for Local Authorities.

6. Children with Family Members in Prison

- 6.1 Approximately 200,000 children in England and Wales have a parent sent to prison each year. These children are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. NICCO provides information designed to support professionals working with offenders and their children, to help mitigate negative consequences for those children

7. Child Criminal Exploitation (CCE)

- 7.1 CCE is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial or other advantage of the perpetrator or facilitator and/or (c) through violence or the threat of violence. victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact; it can also occur through the use of technology.
- 7.2 CCE can include children being forced to work in cannabis factories, being coerced into moving drugs or money across the country (county lines, see page 85 for more information), forced to shoplift or pickpocket, or to threaten other young people Some of the following can be indicators of CCE:
- children who appear with unexplained gifts or new possessions;
 - children who associate with other young people involved in exploitation;
 - children who suffer from changes in emotional well-being;
 - children who misuse drugs and alcohol;

- children who go missing for periods of time or regularly come home late; and
- children who regularly miss school or education or do not take part in education.

8 Child Sexual Exploitation (CSE)

- 8.1 We recognise that CSE is a form of child sexual abuse involving criminal behaviours against children and young people which can have a long-lasting adverse impact on a young person's physical and emotional health. Sexual exploitation involves an individual or group of adults taking advantage of the vulnerability of an individual or groups of children or young people. Victims can be boys or girls. Children and young people are often unwittingly drawn into sexual exploitation through the offer of friendship and care, gifts, drugs and alcohol, and sometimes accommodation. It may also be linked to child trafficking.
- 8.2 The College addresses the risks of sexual exploitation in the tutorial curriculum (THRIVE programme). A common feature of sexual exploitation is that the young person often doesn't recognise the coercive nature of the relationship and doesn't see themselves as a victim. The young person may initially resent what they perceive as interference by staff, but staff must act on their concerns, as they would for any other type of abuse.
- 8.3 All staff, volunteers and governors are made aware of the indicators of sexual exploitation and all concerns are reported immediately to the DSL/Deputy DSL.
- 8.4 The DSL will use the Worcester Safeguarding Children's Partnership CSE Screening Tool on all occasions when there is a concern that a child is being or is at risk of being sexually exploited or where indicators have been observed that are consistent with a child who is being or who is at risk of being sexually exploited.
- 8.5 In all cases if the tool identifies any level of concern the DSL should contact their local Missing and Child Sexual Exploitation Forum and email the completed CSE Screening Tool along with a Family Front Door (FFD) Cause for Concern form. If a child is in immediate danger the police should be called on 999.

9. County Lines

- 9.1 County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one or more importing areas [within the UK], using dedicated mobile phone lines or other form of "deal line".
- 9.2 Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to move [and store] drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims.
- 9.3 Children can be targeted and recruited into county lines in a number of locations including schools, further and higher educational institutions, pupil referral units, special educational needs schools, children's homes and care homes.
- 9.4 Children are often recruited to move drugs and money between locations and are known to be exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection. Children can easily become trapped by this type of exploitation as county lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.
- 9.5 One of the ways of identifying potential involvement in county lines are missing episodes (both from home and school), when the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism¹⁰³ should be considered. If a child is suspected to be at risk of or involved in county lines,

a safeguarding referral should be considered alongside consideration of availability of local services/third sector providers who offer support to victims of county lines exploitation.

9.6 Further information on the signs of a child's involvement in county lines is available in guidance published by the Home Office.

9.7 **Cuckooing**

Cuckooing is when drug gangs take over the home of a vulnerable person through violence and intimidation, using it as their base for selling/manufacturing drugs.

Signs of cuckooing:

- An increase in people coming and going
- An increase in cars or bikes outside
- Litter outside
- Signs of drugs use
- You haven't seen the person who lives there recently or when you have, they have been anxious or distracted.

9.8 **Going Country**

This is the most popular term that describes County Lines activity. It can also mean the act of travelling to another city/town to deliver drugs or money.

9.9 **Trapping**

The act of selling drugs. Trapping can refer to the act of moving drugs from one town to another or the act of selling drugs in one.

9.10 **Trap House**

A building used as a base from where drugs are sold (or sometimes manufactured). These houses usually are occupied by someone (usually adult drug users) but sometimes young people are forced to stay in trap houses.

9.11 **Trap line**

This refers to when someone owns a mobile phone specifically for the purpose of running and selling of drugs.

10. **Domestic Abuse**

10.1 The cross-government definition of domestic violence and abuse is: any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass but is not limited to psychological; physical; sexual; financial; and emotional.

10.2 All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

11. **Homelessness**

11.1 Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The designated safeguarding lead (and any deputies) should be aware of contact details and referral routes into the Local Housing Authority so they can raise/progress concerns at the earliest opportunity.

11.2 Indicators that a family may be at risk of homelessness 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, and in accordance with local procedures, this does not, and should not, replace a referral into children's social care where a child has been harmed or is at risk of harm.

- 11.3 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.
- 11.4 In most cases College staff will be considering homelessness in the context of children who live with their families, and intervention will be on that basis. However, it should also be recognised in some cases 16 and 17-year olds could be living independently from their parents or guardians, for example through their exclusion from the family home, and will require a different level of intervention and support. Children's services will be the lead agency for these young people and the designated safeguarding lead (or a deputy) should ensure appropriate referrals are made based on the child's circumstances. The department and the Ministry of Housing, Communities and Local Government have published joint statutory guidance on the provision of accommodation for 16 and 17-year olds who may be homeless and/or require accommodation: [here](#).

12. Peer on Peer Abuse including Sexual Violence and Harassment

- 12.1 We recognise that young people and children are also vulnerable to physical, sexual and emotional abuse by their peers or siblings. This is most likely to include, but not limited to: bullying (including cyber bullying), physical abuse such as hitting, kicking, shaking, biting, hair pulling or otherwise causing physical harm; gender based violence/sexual violence and sexual harassment, sexting (also known as youth produced sexual imagery); and initiation/hazing type violence and rituals. Abuse perpetrated by young people and children can be just as harmful as that perpetrated by an adult, so it is important to remember the impact on the victim of the abuse as well as to focus on the support for the child or young person exhibiting the harmful behaviour. Such abuse will always be taken as seriously as abuse perpetrated by an adult and the same [safeguarding children procedures](#) will apply in respect of any young person who is suffering or likely to suffer significant harm; staff must never tolerate or dismiss concerns relating to peer on peer abuse.
- 12.2 Abuse should never be tolerated or passed off as "banter", "just having a laugh" or "part of growing up"; We recognize the gendered nature of peer on peer abuse (i.e. that it is more likely that females will be victims and males perpetrators), and some groups are potentially more at risk for example, females, children/young people with SEND and LGBT children/young people but that all peer on peer abuse is unacceptable and will be taken seriously; and that there are different forms peer on peer abuse can take, such as:
- Bullying (including cyberbullying);
 - Sexual violence (such as rape, assault by penetration and sexual assault);
 - Sexual harassment, such as sexual remarks, jokes and online sexual harassment, which may be stand-alone or part of a broader pattern of abuse;
 - Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm;
 - Sexting (also known as youth produced sexual imagery);

- Initiation/hazing type violence and rituals;
- The Voyeurism (Offences) Act, which is commonly known as the Upskirting Act, came into force on 12 April 2019. Upskirting, which typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks 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.

12.3 Staff should be aware that such incidents and/or behaviours can be associated with factors outside the college and can occur between children outside the College. Staff, and particularly the DSL, should always consider the context in which such incidents and/or behaviours occur.

Where the abuse is physical, verbal, bullying or cyber-bullying, recording of such incidents and sanctions will be applied in line with our Student Standards. Where a child discloses safeguarding allegations of a sexual nature

12.4 Where a young person discloses peer on peer sexual violence or harassment against another student in the same setting, the DSL should refer to the Worcestershire Children First website and seek advice from the Family Front Door or Community Social Worker before commencing its own investigation or contacting parents. This may mean, on occasions, that the College is unable to conduct its own investigation into such incidents.

Reports of incidents of sexual violence or sexual harassment will be responded to in line with Part 5 of Keeping Children Safe in Education 2020 and the DfE guidance 'Sexual violence and sexual harassment between children in schools and colleges'. The College will take immediate action to how best support and protect the victim and the alleged perpetrator. Where the disclosure includes an online element the DSL/Deputy DS: will refer to the UKCCIS sexting guidance. It is key that staff do not view or forward illegal images of a child. There is guidance available for when this is unavoidable.

12.5 When there has been a report of sexual violence, the DSL/ Deputy DSL will make an immediate risk and needs assessment. Where a report of rape, assault by penetration or sexual assault is made, this will be passed on to the police Where there has been a report of sexual harassment, the need for a risk assessment will be considered on a case-by-case basis. The risk and needs assessment will consider:

- the victim, especially their protection and support;
- the alleged perpetrator; and
- all the other children/young people (and, if appropriate, adult students and staff) at College, especially any actions that are appropriate to protect them;

Risk assessments will be recorded (written or electronic) and kept under review.

The DSL/Deputy DSL will engage with Children's Social Care and specialist services as required. Where there has been a report of sexual violence, it is likely that professional risk assessments by social workers and or sexual violence specialists will be required.

13. Special Educational Needs and Disability (SEND)

13.1 We recognise that young people with special educational needs and disabilities can face additional safeguarding challenges and these are discussed in staff training. These additional barriers can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the young person's disability without further exploration;
- young people with SEN and disabilities can be disproportionately impacted by things like bullying without outwardly showing any signs; and
- communication barriers and difficulties in overcoming these barriers.

14. Children with additional vulnerabilities

14.1 There are many children who have additional needs or whose living arrangements may mean that they are more vulnerable to harm, for example children with special educational needs, disabled children, children in public care or privately fostered children. It is essential that the school knows who shares parental responsibility for children and has effective relationships with partner agencies in relation to these children (for example, Virtual School for Children in Care).

The College will ensure that staff have sufficient knowledge and guidance so that they are aware of the additional challenges faced by these children and the impact of their additional vulnerabilities. These can include: assumptions that indicators of possible abuse such as behaviour, mood and injury relate to a child's disability without further exploration; no single point of contact for the College as a child has a number of care-givers and involved professionals; assumptions that state approved care-givers are providing safe care for the child; communication needs of a child which can lead to over reliance on parental accounts and interpretations.

15. Extremism and Radicalisation

15.1 The Prevent Duty for England and Wales (2015) under section 26 of the Counterterrorism and Security Act 2015 places a duty on education and other children's services to have due regard to the need to prevent people from being drawn into terrorism.

Extremism is defined as 'as '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.

Some children/young people are at risk of being radicalised; adopting beliefs and engaging in activities which are harmful, criminal or dangerous.

We recognise that children and some adults are vulnerable to extremist ideology and radicalisation. We recognise that safeguarding against radicalisation and extremism is no different to safeguarding against any other vulnerability in today's society.

The College encourages students to respect the fundamental British values of democracy, the rule of law, individual liberty and mutual respect, and tolerance of those with different faiths and beliefs. We ensure that partisan political views are not promoted in the teaching of any subject in the college and where political issues are brought to the attention of the students; reasonably practicable steps have been taken to offer a balanced presentation of opposing views to students.

We value freedom of speech and the expression of beliefs/ideology as fundamental rights underpinning our society's values. Both students and staff have the right to speak freely and voice their opinions. However, freedom comes with responsibility and free speech that is designed to manipulate the vulnerable or that leads to violence and

harm of others goes against the moral principles in which freedom of speech is valued. Free speech is not an unqualified privilege; it is subject to laws and policies governing equality, human rights,

We will ensure that:

- All staff are aware of the College's Prevent strategy.
- Through training, staff, volunteers and governors have an understanding of what radicalisation and extremism is, why we need to be vigilant in College and how to respond when concerns arise.
- There are systems in place for keeping pupils safe from extremist material when accessing the internet in our college by using effective filtering and usage policies.
- The DSL/Deputy DSL has received Prevent training and will act as the point of contact within our College for any concerns relating to radicalisation and extremism.
- The DSL/Deputy DSL will make referrals in accordance with West Midlands child protection procedures and will represent our College at Channel meetings as required.
- Through our curriculum, we will promote the spiritual, moral, social and cultural development of pupils. We encourage pupils to respect the fundamental British values of democracy, the rule of law, individual liberty and mutual respect, and tolerance of those with different faiths and beliefs.
- We will use relevant information, tools and resources to help our staff and parents recognise and address extremism and radicalisation in young people, for example the Educate Against Hate website.
- The College seeks to protect children and young people against the messages of all violent extremism including, but not restricted to, those linked to Islamist ideology, or to Far Right / Neo Nazi / White Supremacist ideology, Irish Nationalist and Loyalist paramilitary groups, and extremist Animal Rights movements.
- When any member of staff has concerns that a student may be at risk of radicalisation or involvement in terrorism, they should speak with the DSL. They should then follow normal safeguarding procedures. If the matter is urgent then Worcester Police must be contacted by dialling 999. In non-urgent cases where police advice is sought then dial 101. The Department of Education has also set up a dedicated telephone helpline for staff and governors to raise concerns around Prevent (020 7340 7264).

16. Forced Marriage

- 16.1 Forcing a person into a marriage is a crime in England and Wales under the Anti-Social Behaviour, Crime and Policing Act 2014. 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, financial, sexual and emotional pressure or psychological. It may also involve physical or sexual violence and abuse. 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 communities use religion and culture as a way to coerce a person into marriage. Schools and colleges can play an important role in safeguarding children from forced marriage.

A forced marriage is not the same as a pre-introduced or arranged marriage which is common in several cultures, whereby the families of both spouses take a leading role in arranging the marriage but the choice of whether or not to accept the arrangement remains with the prospective spouses.

School staff should never attempt to intervene directly as a school or through a third party. Contact should be made with Family Front Door.

For further guidance, read 'Forced Marriage' and Worcestershire's Forced Marriage, Honour-Based Abuse and Female Genital Mutilation Protocol – January 2016

The Forced Marriage Unit has published [statutory guidance Multi-agency guidelines](#), which focus on the role of schools and colleges.

16.2 All staff are made aware of forced marriage and all concerns are reported to the DSL/Deputy DSL.

17. 'Honour Based' Abuse, Female Genital Mutilation (FGM) and Breast Ironing

17.1 We recognise that our staff are well placed to identify concerns and take action to prevent children and young people from becoming victims of Female Genital Mutilation (FGM) and other forms of so-called 'honour-based' abuse (HBA) and provide guidance on these issues through our safeguarding training. If staff have a concern regarding a child or young person that might be at risk of HBA they should inform the DSL/Deputy DSL who will activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and children's social care.

- 17.2 Honour based abuse (HBA) can be described as a collection of practices, which are used to control behaviour within families or other social groups to protect perceived cultural and religious beliefs and/or honour. Such violence can occur when perpetrators perceive that a relative has shamed the family and/or community by breaking their honour code. It is a violation of human rights and may constitute domestic and/or sexual abuse.

Honour based abuse might be committed against people who

- become involved with a boyfriend or girlfriend from a different culture or religion;
- want to get out of an arranged marriage;
- want to get out of a forced marriage;
- wear clothes or take part in activities that might not be considered traditional within a particular culture

17.3 Female Genital Mutilation (FGM) is illegal in England and Wales under the FGM Act (2003). It is a form of child abuse and violence against women. A mandatory reporting duty requires teachers to report 'known' cases of FGM in under 18s, which are identified in the course of their professional work, to the police.

The duty applies to all persons who is employed or engaged to carry out 'teaching work' in the school, whether or not they have qualified teacher status. The duty applies to the individual who becomes aware of the case to make a report. It should not be transferred to the Designated Safeguarding Lead; however the DSL should be informed.

If a teacher is informed by a girl under 18 that an act of FGM has been carried out on her or a teacher observes physical signs which appear to show that an act of FGM has been carried out on a girl under 18 and they have no reason to believe the act was

necessary for the girl's physical or mental health or for purposes connected with labour or birth, the teacher should personally make a report to the police force in which the girl resides by calling 101. The report should be made by the close of the next working day.

Concerns about FGM outside of the mandatory reporting duty should be reported as per the safeguarding procedures. Staff should be particularly alert to suspicions or concerns expressed by female pupils about going on a long holiday during the summer vacation period. There should also be consideration of potential risk to other girls in the family and practicing community.

Where there is a risk to life or likelihood of serious immediate harm the teacher should report the case immediately to the police, including dialling 999 if appropriate.

There are no circumstances in which a teacher or other member of staff should examine a girl.

- 17.4 Breast ironing is a form of physical abuse that has been condemned by the United Nations and identified as Gender-based Violence. Although, countries where breast ironing is prevalent have ratified the African Charter on Human Rights to prevent harmful traditional practices, it is not against the law.

Breast ironing does not stop the breasts from growing, but development can be slowed down. Damage caused by the 'ironing' can leave women with malformed breasts, difficulty breastfeeding or producing milk, severe chest pains, infections and abscesses. In some cases, it may be related to the onset of breast cancer.

Breast Ironing in the UK

Concerns have been raised that breast ironing is also to be found amongst African communities in the UK, with as many as 1000 girls at risk. Keeping Children Safe in Education (2018) mentions breast ironing on page 80, as part of the section on so-called 'honour-based' violence. Staff worried about the risk of breast ironing in college should speak to the Designated Safeguarding Lead as soon as possible. Colleges need to know the risk level within their communities and tackle the risk as appropriate.

All staff are made aware of forced marriage and all concerns are reported to the DSL/Deputy DSL.

18. Modern Slavery

- 18.1 The Modern Slavery Act 2015 places a new statutory duty on public authorities, including colleges, to notify the National Crime Agency (NCA) (section 52 of the Act) on observing signs or receiving intelligence relating to modern slavery. The public authority (including colleges) bears this obligation where it has 'reasonable grounds to believe that a person may be a victim of modern slavery or human trafficking'. Staff need to be aware of this duty and inform the DSL/Deputy DSL should they suspect or receive information that either parents or their children may be victims of modern slavery. The DSL/Deputy DSL will then contact the NCA.

19. Online Safety

- 19.1 The use of technology has become a significant component of many safeguarding issues. Child sexual exploitation; radicalisation; sexual predation: technology often provides the platform that facilitates harm. The breadth of issues classified within online safety is considerable, but can be categorised into three areas of risk:

- **content:** being exposed to illegal, inappropriate or harmful material; for example, pornography, fake news, racist or radical and extremist views;
- **contact:** being subjected to harmful online interaction with other users; for example, commercial advertising as well as adults posing as children or young adults; and
- **conduct:** personal online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images, or online bullying.

19.2 The college has in place filters and has invested in monitoring systems which safeguard and promote the welfare of children and adults and provide them with a safe environment.

20. Procedure for dealing with disclosures

20.1 If a learner or member of staff discloses directly to a member of staff, the following procedure will be followed:

- Listen carefully to what is said.
- Ask open questions such as:
 - 'Tell me what happened'.
 - 'Please explain what you mean when you say.....'
 - 'Can you describe the person?' or 'Can you describe the place?'
- Do not ask questions which may be considered to suggest what might have happened, or who has perpetrated the abuse, e.g. 'Did your Dad hit you?'
- Do not force the learner to repeat what he/she said in front of another person.
- Do not begin an investigation.

20.2 Report immediately to the DSL/Deputy DSL and complete a written record, using the student's words as far as possible.

If at any point, there is a risk of immediate serious harm to a child a referral should be made to Children's Services immediately. Anybody can make a referral. Concerns should always lead to help for the child at some point.

Staff should always follow the reporting procedures outlined in this policy in the first instance. However, they may also share information directly with Children's Services, or the police if:

- the situation is an emergency and the designated senior person, their deputy and members of SLT are all unavailable;
- they are convinced that a direct report is the only way to ensure the student's safety.

21. Looked After Children/Care Leavers

21.1 The most common reason for children becoming looked after is as a result of abuse and/or neglect. Governing bodies and proprietors should ensure that staff have the skills, knowledge and understanding to keep looked after children safe.

In particular, they should ensure that appropriate staff have the information they need in relation to a child's looked after legal status (whether they are looked after under voluntary arrangements with consent of parents, or on an interim or full care order) and the child's contact arrangements with birth parents or those with parental responsibility.

They should also have information about the child's care arrangements and the levels of authority delegated to the carer by the authority looking after him/her. The designated safeguarding lead should have details of the child's social worker and the name of the virtual school head in the authority that looks after the child.

- 21.2 Local authorities have on-going responsibilities to the young people who cease to be looked after and become care leavers.¹ That includes keeping in touch with them, preparing an assessment of their needs and appointing a personal adviser who develops a pathway plan with the young person. This plan describes how the local authority will support the care leaver to participate in education or training. Designated safeguarding leads should therefore have details of the local authority Personal Advisor appointed to guide and support the care leaver and should liaise with them as necessary regarding any issues of concern affecting the care leaver.

22. Children potentially at greater risk of harm

- 22.1 Children who need a social worker (Child in Need and Child Protection Plans)
Children may need a social worker due to safeguarding or welfare needs. Children may need this help due to abuse, neglect and complex family circumstances. A child's experiences of adversity and trauma can leave them vulnerable to further harm, as well as educationally disadvantaged in facing barriers to attendance, learning, behaviour and mental health.
- 22.2 Local authorities should share the fact a child has a social worker, and the designated safeguarding lead should hold and use this information so that decisions can be made in the best interests of the child's safety, welfare and educational outcomes. This should be considered as a matter of routine. There are clear powers to share this information under existing duties on both local authorities and schools and colleges to safeguard and promote the welfare of children.
- 22.3 Where children need a social worker, this should inform decisions about safeguarding (for example, responding to unauthorised absence or missing education where there are known safeguarding risks) and about promoting welfare (for example, considering the provision of pastoral and/or academic support, alongside action by statutory services).
- 22.4 Findings from the Children in Need review, ['Improving the educational outcomes of Children in Need of help and protection'](#) contains further information; the conclusion of the review, ['Help, protection, education'](#) sets out action Government is taking to support this.

23. Contextualised Safeguarding

- 23.1 All staff should be aware that safeguarding incidents and/or behaviours can be associated with factors outside the school or college and/or can occur between children outside of these environments.
- 23.2 All staff, but especially the designated safeguarding lead (and deputies) should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, and serious youth violence.

24. Information Sharing and Confidentiality

¹ A care leaver who is 16 or 17 (referred to in legislation as a 'relevant child' is defined in section 23A(2) of the Children Act 1989 as a child who is (a) not looked after (b) aged 16 or 17, and (c) was, before ceasing to be looked after by a local authority, looked after for a period of 13 weeks, or periods amounting in total to 13 weeks, beginning after s/he reached the age of 14 and ended after s/he reached the age of 16.

24.1 Information sharing is vital in identifying and tackling all forms of abuse.

All personal information will be processed fairly and lawfully in line with our duties under the Data Protection Act 2018 and GDPR and will be held safely and securely. GDPR does not prevent, or limit, the sharing of information for the purposes of keeping children safe. Legal and secure information sharing between schools and Children's social care, and other agencies is essential for keeping children safe and ensuring they get the support they need,

Information can we shared without consent if to gain consent would place a child at risk.

All data on the safeguarding file potentially forms part of an important story that may be needed retrospectively for many years. The elements of a student's file (name and address) that are needed to identify children with certainty are needed to be retained along with those records (until at least 25 years old).

The college recognises that all matters relating to safeguarding are confidential. The DSL/Deputy DSL or Principal will disclose information regarding a student or member of staff to other staff on a need to know basis only.

All staff must be aware that they have a professional responsibility to share information with other agencies in order to safeguard children.

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

When a child about whom concerns have been raised and recorded leaves the college, the DSL will consider if it would be appropriate to share information with the new college in advance of the child leaving to ensure that support is in place for when the child arrives.

24.2 Members of the College Safeguarding Team will:

- Explain to young people and families at the beginning of any involvement openly and honestly what information is to be shared and why.
- Consider the safety and security of the young person when making a decision on whether to share information.
- Respect the views of the young person and family when consent is not given. However, the DSL/Deputy DSL may need to override their wishes and share information whilst being honest in the interests of maintaining a working relationship.
- Seek advice if in doubt, especially where these relate to concern about significant harm to a child or serious harm to others. A cause, or possible cause, must not be ignored.
- A '*breach of confidentiality*' only occurs where the sharing of information is not authorised by the individual who provided it and to whom it relates. Refusal of consent does not necessarily preclude the sharing of information.

The College can lawfully justify the sharing of confidential information where:

- there is evidence that a young person/vulnerable adult is suffering or is at risk of suffering significant harm;
- where there is reasonable cause to believe that a young person/vulnerable adult may be suffering or is at risk of suffering significant harm;
- to prevent significant harm arising to a young person/vulnerable adult including through the prevention, detection and prosecution of serious crime – Safeguarding Children in Education, September 2018

24.3 Informing ESFA about serious safeguarding incidents.

The local authority and the institution have primary duties in respect of safeguarding, the Secretary of State (SoS) has a general duty to promote the wellbeing of children in England under section 7 of the Children and Young Persons Act 2008. ESFA's role therefore, is to provide assurance to the SoS, in meeting her general duty, that the right organisations are taking action to keep all pupils and students safe.

For this reason, ESFA want to be made aware when an institution is itself the subject of an investigation by the local authority or the police. They do not require details of all the safeguarding incidents an institution reports to the local authority or to the police, only where the institution itself, or one of its subcontractors, is subject to investigation. In such circumstances, ESFA requires the Chair or Chief Executive of the institution (or senior designated safeguarding lead) to email Enquiries.EFA@education.gov.uk.

The main issues/referrals ESFA want to be notified about, where any funded students are concerned and those that result in police investigations. ESFA needs to be sighted on these cases and satisfied the right action is in hand by responsible bodies.

Once ESFA has been alerted that a serious safeguarding incident has taken place at an ESFA funded institution, ESFA will ensure the SoS is made aware. ESFA will then liaise with the organisations that have the primary duty. ESFA will take the action they deem necessary in accordance with the funding agreement.

ESFA do not require institutions to routinely inform ESFA about Prevent referrals to channel panels. In line with the position on safeguarding more generally, they only require institutions to inform them when an institution is itself, or one of its subcontractors, is the subject of an investigation by the local authority or the police in connection with a Prevent issue. In such circumstances, they require the Chair or Chief Executive of the Institution (or senior designated safeguarding lead) to email Enquiries.EFA@education.gov.uk.

25. Record Keeping

- 25.1 Any member of staff receiving a disclosure of abuse from a young person or vulnerable adult, or noticing signs or symptoms of abuse, will make notes as soon as possible writing down exactly what was said using the individual's own words as far as possible. All notes will be timed, dated and signed. Concerns should be recorded via the College Safeguarding Team's secure recording system. All records of a safeguarding nature should be passed to the DSL/ Deputy DSL. The DSL/Deputy DSL will maintain and regularly audit the college's child protection records and ensure that each stand-alone file includes a chronology of significant events.
- 25.2 Safeguarding files transferred to other education establishments when the student moves to them. The files are transferred to the DSL in the receiving establishment including any necessary discussion or explanation. A signed dated record of the transfer is obtained and retained. Any files requested by agencies e.g. police, will be copied.
- 25.3 A record of any allegations (proven) made against staff is kept in a confidential file by the HR department.

26. Supporting Learners

26.1 We recognise that young people/vulnerable adults who are abused or witness violence may find it difficult to develop a sense of self-worth. They may feel helplessness, humiliation and some sense of blame. The College may be the only stable, secure and predictable element in the lives of some individuals at risk. The College will endeavour to support the student through:

- The achievement of their qualification;
- The College ethos which promotes a positive, supportive and secure environment and gives individuals a sense of being valued;
- Adherence to the Student Standards Policy, ensuring that unacceptable behaviour is challenged with due consideration paid to individual circumstances;
- Liaison with partner agencies such as Children's Social Care, Child and Adult Mental Health Service (CAMHS) and other relevant agencies;
- The use of early help interventions, through the Family Front Door, when appropriate.
- Notifying Children's Social Care immediately if there is a significant concern.
- Providing continuing support to individuals by ensuring that appropriate information is forwarded under confidential cover to any new provider.

27. Safeguarding Vulnerable Adults from Abuse

27.1 All adults have a right to:

- Live free from violence
- Be protected from harm & exploitation
- Independence, which involves a degree of risk.

27.2 Who is vulnerable?

The term "vulnerable" adult refers to any person aged 18 years and over who is or may be in need of community care services by reason of mental or other disability, age, illness and who is or may be unable to take care of himself or herself, or unable to protect himself or herself against significant harm or serious exploitation.

'Abuse' is the inflicting of harm, or by failing to act to prevent harm.

Vulnerable students may be abused within a dependent relationship or, more rarely, by a stranger. Abuse can be intentional or unintentional. There are 6 categories of abuse, which are physical, sexual, neglect, emotional, psychological or financial. It is not unusual for a vulnerable student to suffer more than one kind of abuse. Abuse may be a part of a pattern of behaviour or an isolated incident.

27.3 Other instances of vulnerability

We should also be aware of those students/adults who might find themselves vulnerable due to circumstance. For example, those who have:

- Experience of domestic abuse
- Experience of Child Sexual and or Criminal Exploitation
- Experience of past or repeat bullying
- A history of self-neglect or self-harm
- Been a victim of abuse or crime
- Experienced abuse due to their racial, cultural or religious background
- A poor socio-economic background
- Refugee or asylum status

- Are or have been in the care system

- 27.4 Staff should note that vulnerable people are not a homogenous group, and the vulnerable status of a student/adult can change constantly depending on their circumstances.
- 27.5 If anyone suspects witnesses or hears of abuse, they should immediately contact the DSL, the Deputy DSL or a member of the college Safeguarding Team. They will then follow the internal College safeguarding procedure and ensure that support is initiated.

28. Mental Health

- 28.1 The College aims to provide a supportive environment that will help learners with mental health difficulties to realise their academic potential and meet course requirements. We also aim to facilitate and promote positive mental health and well-being
- 28.2 If a student is considered to be at serious risk of self-harm the matter should be reported to the DSL, the Deputy DSL or a member of the Safeguarding Team. There are varying levels of risk; inevitably personal judgment will be required as to the seriousness and urgency of the situation and the appropriate course of action.
- 28.3 The safety of the individual concerned and of those around them is paramount. Where there are clear indications that the student is in imminent and serious danger the emergency services should be called.

29. Safer Recruitment and Selection of Staff and Volunteers

- 29.1 The College has a Recruitment Policy linking explicitly to this subject. The policy statement regarding safeguarding is included in all job advertisements, publicity material, recruitment websites and candidate information. This is further reinforced when offers of employment are made to candidates, in offer letters, conditions of employment and contracts of employment.
- 29.2 The recruitment procedure is robust in seeking to establish the commitment of candidates to support the College's measures to safeguard young people and vulnerable adults and to deter, reject or identify people who might abuse individuals or are otherwise unsuitable to work with them. Please refer to this policy for information on DBS requirements and interim arrangements on appointment.

All staff are required to undertake an enhanced DBS check with barred list check and in the absence of this check, before an applicant can start at the College a risk assessment will be conducted.

- 29.3 Our governors are subject to an enhanced DBS check with barred list check, in line with Worcestershire County Council's recommendation.

30. Allegations against Staff

- 30.1 It is recognised that a learner may make an allegation against a member of staff or volunteer. If such an allegation is made, the member of staff receiving the allegation will immediately inform the DSL and/or Principal, unless the allegations concern the Principal, in which case the Chair of Governors will be informed immediately.

30.2 The DSL (or Chair of Governors) on all such occasions will discuss the content of the allegation with the Local Authority Designated Officer (LADO). The College will follow LA procedures for managing allegations against staff. Please refer to the Managing Allegations Policy for further guidance.

31. Whistleblowing

31.1 It is recognised that learners cannot be expected to raise concerns in an environment where staff fail to do so. All staff should be aware of their duty to raise concerns, where they exist, about the attitude or actions of colleagues. Please refer to the Whistleblowing Policy for further guidance.

32. Abuse of Position of Trust

32.1 It is recognised that as adults working in College, we are in a relationship of trust with the learners in our care and acknowledge that it is a criminal offence to abuse that trust. We acknowledge that the principle of equality embedded in the legislation of the Sexual Offences Act 2003 applies irrespective of sexual orientation: neither homosexual nor heterosexual relationships are acceptable within a position of trust. It is recognised that the legislation is intended to protect young people in education who are over the age of consent but under 18 years of age, a significant cohort of the learners in College. However, it is important to note that staff should maintain appropriate boundaries with learners of all ages. Please refer to the Professional Code of Standards for Staff for further guidance.

33. Positive Physical Intervention

33.1 The College policy on positive handling is set out in a separate policy and acknowledges that staff must only ever use physical intervention as a last resort, and that at all times it must be the minimal force necessary to prevent injury or damage to property. Please refer to the Search and Restraint Policy for further guidance.

34. Health and Safety

34.1 The College Health and Safety Policy reflects the consideration given to the safeguarding of learners and staff both within the College environment and when away from College undertaking trips and visits.

34.2 Risk assessments are undertaken and reviewed regularly, in respect of site security, risk of young people being drawn into terrorism or exposed to extremist behaviour, risk to and from young people displaying harmful behaviour.

35. Photography and Use of Images

35.1 The welfare and protection of our students is paramount and consideration should always be given to whether the use of photography is a risk. For this reason, consent is always sought when photographing students using any means and including ipads, smart phones or camera and additional consideration given to photographing vulnerable students, particularly Looked After Children or those known to be fleeing domestic violence. Consent must be sought from those with parental responsibility (this may include the Local Authority in the case of Looked After Children).

36. Safe Environment

- 36.1 The College undertakes appropriate risk assessments and checks in respect of all equipment and of the buildings and grounds in line with local and national guidance and regulations concerning health and safety. The College has adequate security arrangements in place in respect of the use of its grounds and buildings by visitors.
- 36.2 Visitors to the college, for example visiting speakers, theatre groups or curriculum specialists, will be appropriately checked and vetted and must complete procedures detailed in the Visiting External Speakers Policy to ensure they are not linked to extremist groups or promoting extremist or other harmful material.

37. Racist Incidents

- 37.1 Racist incidents are dealt with through guidance set out in the Student Standards Policy. The College acknowledges that repeated racist incidents or a single serious incident may lead to consideration under child protection procedures.

38. Anti Bullying

- 38.1 Bullying incidents are dealt with through guidance set out in the Student Standards Policy. The College acknowledges that to allow or condone bullying may lead to consideration under child protection procedures. All incidences of bullying, including cyber-bullying, racist, homophobic and gender-related bullying, will be dealt with in accordance with our Student Standards Policy. We recognise that students with special needs and/or disabilities are more susceptible to being bullied.
Bullying incidents concerning staff are dealt with through the Prevention of Harassment and Bullying policy
- 38.2 We recognise that there will be occasions when bullying incidents will fall within child protection procedures or may be deemed criminal activity and that it may be necessary to report the concerns to the Family Front Door or to the Police.

39. Challenge and Escalation

- 39.1 The College recognises that professional disagreements may arise between any agencies and resolving problems is an integral part of co-operation and joint working to safeguard young people/vulnerable adults.
- 39.2 As part of our responsibility for safeguarding, we acknowledge that we must be prepared to challenge each other if we feel that responses to concerns, assessments or the way in which plans are implemented are not safeguarding the young person/vulnerable adult and promoting their welfare.
- 39.3 We are aware of the Worcestershire Safeguarding Children Partnership escalation procedures for raising concerns in respect of poor practice and recognise our responsibility to utilise these as and when necessary, in the interests of safeguarding and promoting the welfare of our students.

40. Monitoring and Evaluation

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

- Termly audit and analysis of Safeguarding cases ;
- Completion of an annual safeguarding report to Corporation;
- Completion of the WSCB safeguarding audit tool
- Student surveys and questionnaires;
- Discussions with students and staff;
- Scrutiny of data and risk assessments;
- Scrutiny of the single central record of recruitment checks;
- Termly meetings with the Link Governor for Safeguarding;
- Supervision of staff involved in child protection cases;
- Case file audits undertaken by the DSL/Deputy DSL.

41. Safeguarding Contacts

Internal

Designated Safeguarding Lead: Julia Breakwell
Vice Principal Information Systems and Student Experience.
Tel: 01905 572599 Mobile: 07799 216 454
(available during college opening times)
Email: Jbreakwell@howcollege.ac.uk

Deputy DSL: Sal Friel
Student Engagement Manager
Tel: 01527 572525 Mobile: 07967 445 749
Email: sfriel@howcollege.ac.uk

College Safeguarding Teams

Cross College

Worcester & Malvern: Deborah Bird
Wellbeing and Safeguarding Officer
Tel: 01905 725534 Mobile: 07789 754 161
Email: dbird@howcollege.ac.uk

Trudy Hazeldine
Wellbeing and Safeguarding Officer
Tel: 01527 405461 Mobile: 07912 783 040
Email: thazeldine@howcollege.ac.uk

Sarah McCollum
Wellbeing and Safeguarding Officer

Tel: 01527 572686 Mobile: 07932 428 432
Email: smccollum@howcollege.ac.uk

Bromsgrove & Redditch

Madeleine Penny
Wellbeing and Safeguarding Officer
01527 527649 07967 445 558
Email: mpenny@howcollege.ac.uk

Helen Wood
Wellbeing and Safeguarding Officer
Tel: 01527 572811 Mobile: 07881 379 253
Email: hwood@howcollege.ac.uk

Bethan Williams
Wellbeing and Safeguarding
Tel: 01527 572554 Mobile: 07811 379 252
Email: bewilliams@howcollege.ac.uk

Yasmin Millward
Wellbeing and Safeguarding Officer
Tel: 01527 572899 Mobile: 07525 800 573
Email: ymillward@howcollege.ac.uk

Safeguarding Governor

Lucy Hodgson

External

Children's Services Family Front
Door (FFD)

Tel: 01905 822666
Email: childrensteam@worcestershire.gov.uk

Emergency Duty Team (EDT)
out of office hours

Tel: 01905 768020
Website: <http://worcestershire.gov.uk/>

To submit an online Cause for
Concern notification log onto:

<http://www.worcestershire.gov.uk/childrensocialcare>

Community Social Work Team

Tel: 01905 846057

Local Authority Designated Officer:

Tel: 01905 846221
Email: lado@worcestershire.gcsx
Website:
http://www.worcestershire.gov.uk/info/20559/refer_to_childrens_social_care/1659/are_you_worried_about_an_adult_who_works_with_children

Education Adviser – Safeguarding:
Denise Hannibal

Tel: 01905 844436
Email: dhannibal@worcestershire.gov.uk

Police – Prevent team: Tel: 01386 591835
Email: prevent@warwickshireandwestmercia.pnn.police.uk

Anti-terrorist Hotline Tel: 0800 789 321

Ofsted Tel: 0300 123 1231

Childline Tel: 0800 1111

Women’s Aid (24hr. Helpline) Tel: 0808 2000 247
Email: helpline@womensaid.org.uk

West Mercia Rape and Sexual Abuse Support Centre (WMRSASC) Tel: 01905 724514

West Mercia Police:
24hrs non-emergency Tel: 101/0300 333 3000
Emergency Tel: 999
Website: www.westmerciapolice.uk

NSPCC Helpline 0808 800 5000

College staff can contact the Forced Marriage Unit if they need advice or information:
Contact: 020 7008 0151 or email fm@fco.gov.uk

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Appendices

Appendix 1

Additional support and advice

Abuse or Safeguarding issue	Link to Guidance/Advice	Source
Abuse	What to do if you're worried a child is being abused	DfE advice
	Domestic abuse: Various Information/Guidance	Home Office
	Faith based abuse: National Action Plan	DfE advice
	Relationship abuse: disrespect nobody	Home Office website
	Working together until women and children are safe	Women's Aid
	Support for survivors of any form of sexual attack	WMRASASC
	Sexual Assault Referral Centre	The Glade
	Rape and sexual violence support across Birmingham and Solihull	RSVP
	Support for people affected by crime	Victim Support
	Boys2men	SAFE Stop Abuse for Everyone
Benefit Advice	Benefit advice	Department for Work and Pensions
	Information on benefits and tax credits	Citizens Advice Bureau
Bullying	Preventing bullying including cyberbullying	DfE advice
Children and the courts	Advice for 5-11-year olds witnesses in criminal courts	MoJ advice
	Advice for 12-17 year old witnesses in criminal courts	MoJ advice
Children missing from education, home or care	Children missing education	DfE statutory guidance
	Child missing from home or care	DfE statutory guidance
	Children and adults missing strategy	Home Office strategy
Children with family members in prison	National Information Centre on Children of Offenders	Barnardo's in partnership with Her Majesty's Prison and Probation Service (HMPPS)

Child Exploitation	<u>County Lines: criminal exploitation of children and vulnerable adults</u>	Home Office guidance
	<u>Child sexual exploitation: guide for practitioners</u>	DfE
	<u>Trafficking: safeguarding children</u>	DfE and HO guidance
	<u>CSE support</u>	Tell Someone
	<u>Parents against child sexual exploitation</u>	PACE
Drugs and Alcohol	<u>Drugs: advice for schools</u>	DfE and ACPO advice
	<u>Drug strategy 2017</u>	Home Office strategy
	<u>Information and advice on drugs</u>	Talk to Frank website
	<u>Empowering people to live healthy, safe and happy lives</u>	Swanswell website
	<u>ADEPIS platform sharing information and resources for schools: covering drug (& alcohol) prevention</u>	Website developed by Mentor UK
General Support	<u>https://www.westmercia.police.uk/home</u>	West Mercia Police
	<u>http://www.youngsolutions.org.uk/</u>	Young Solutions
	<u>https://www.actionforchildren.org.uk/</u>	Action for children
	<u>Advice and guidance for families, children and adults</u>	Your life, your choice
“Honour Based Violence” (so called)	<u>Female genital mutilation: information and resources</u>	Home Office
	<u>Female genital mutilation: multi agency statutory guidance</u>	DfE, DH, and HO statutory guidance
	<u>Forced marriage: information and practice guidelines</u>	Foreign Commonwealth Office and Home Office
	<u>Supporting victims of honour-based abuse and forced marriage</u>	Karma Nirvana website
Health and Wellbeing	<u>Fabricated or induced illness: safeguarding children</u>	DfE, Department for Health and Home
	<u>Rise Above: Free PSHE resources on health, wellbeing and resilience</u>	Public Health England resources
	<u>Medical-conditions: supporting pupils at school</u>	DfE statutory guidance
	<u>Mental health and behaviour</u>	DfE advice
Homelessness	<u>Homelessness: How local authorities should exercise their functions</u>	HCLG
	<u>Worcester City Council - Homeless support</u>	Worcester City Council
	<u>Redditch Borough Council - Homeless support</u>	Redditch Borough Council
	<u>Bromsgrove District Housing Trust</u>	Bromsgrove District Housing Trust
	<u>Emergency accommodation for 16-25 year olds</u>	Nightstop

	<u>Supported housing for young people</u>	YMCA
	<u>Homelessness support for 16-25 year olds across West Midlands</u>	St Basil's
	<u>Homelessness prevention - South Birmingham</u>	South Birmingham Homeless Project
	<u>Drop in centre and floating support</u>	The Basement Project
	<u>https://www.fortisliving.com/</u>	Fortis Living
LGBT	<u>Support for gender variant and transgender children, young people and their families</u>	Mermaids
	<u>Advocate for and supporting lesbian, gay, bisexual and trans communities in Birmingham</u>	The Birmingham LGBT Society
	<u>Increasing understanding of gender diversity</u>	Gendered Intelligence
	<u>Empowering individuals</u>	Stonewall
	<u>Worcestershire Pride</u>	Worcestershire Pride
Mental Health	<u>Child and adolescent mental health services</u>	CAMHS website
	<u>Healthy Minds</u>	Healthy Minds website
	<u>Worcestershire Services</u>	Worcestershire Wellbeing Hub
	<u>Get support</u>	Childline
	<u>Essential Support for under 25s</u>	The Mix
	<u>Online support for young people</u>	Kooth
	<u>Children's mental health charity</u>	Place 2 be
	<u>Relationship support</u>	Relate
	<u>Support for bereaved families in Worcestershire</u>	Footsteps
	<u>Supporting bereaved young people in NE Worcestershire</u>	Touchstones
	<u>The big listen</u>	Samaritans
	<u>Mental Health Charity</u>	Mind

Online Safety	<u>Sexting: responding to incidents and safeguarding children</u>	UK Council for Child Internet Safety
	<u>Internet safety support and advice</u>	CEOP Thinkuknow
Private Fostering	<u>Private fostering: local authorities</u>	DfE - statutory guidance
Radicalisation	<u>Prevent duty guidance</u>	Home Office guidance
	<u>Prevent duty advice for schools</u>	DfE advice
	<u>Educate Against Hate Website</u>	DfE and Home Office
Sexual Health	<u>Sexual Health services</u>	Know your stuff NHS
Violence	<u>Gangs and youth violence: for schools and colleges</u>	Home Office advice
	<u>Ending violence against women and girls 2016-2020 strategy</u>	Home Office strategy
	<u>Violence against women and girls: national statement of expectations for victims</u>	Home Office guidance
	<u>Sexual violence and sexual harassment between children in schools and colleges</u>	DfE advice
	<u>Serious violence strategy</u>	Home Office Strategy
Young Carers	<u>Support for young carers</u>	YSS website

Appendix 2

Potential signs of safeguarding concerns

Young people may be at risk in a family or in an institutional or community setting, by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults, or another child or children.

Indicators of safeguarding concerns

Caution should be used when referring to lists of signs and symptoms of potential safeguarding concerns. Although the signs and symptoms listed below may be indicative of abuse or risk there may be alternative explanations. In assessing the circumstances of any child any of these indicators should be viewed within the overall context of the child's individual situation including any disability.

Common indicators

- Self-depreciation
- Extreme fear
- Being isolated or withdrawn
- Seeking attention/being over familiar
- Self-harm
- Substance abuse
- Eating disorder
- Poor attendance and/or poor punctuality
- Anti-social behaviour
- Untreated medical problems
- Health problems associated with lack of basic facilities
- Unexplained injuries
- Bruises, black eyes, broken bones
- Chronic running away
- Missing education
- Missing from home or care
- Estranged from their family
- Poor mental health
- Thoughts or attempts at suicide
- Trying to be ultra-good or perfect; overacting to criticism
- Gang related associations
- Knowledge that the young person is going abroad to be 'cut' or be married
- Voicing extremist ideologies
- Significant changes to appearance

If you have any concerns about a child or young person contact a member of the safeguarding team.

Appendix 3

Safer Recruitment and DBS checks – policy and procedures

We will record all information on the checks carried out in the college's single central record (SCR). Copies of these checks, where appropriate, will be held in individuals' personnel files. We follow requirements and best practice in retaining copies of these checks, as set out below.

The SCR will be monitored and checked by the DSL on a regular basis, throughout the academic year:

Appointing new staff

When appointing new staff, we will:

- Verify their identity
- Obtain (via the applicant) an enhanced Disclosure and Barring Service (DBS) certificate, including barred list information for those who will be engaging in regulated activity (see definition below). We will not keep a copy of this for longer than 6 months
- Obtain a separate barred list check if they will start work in regulated activity before the DBS certificate is available
- Verify their mental and physical fitness to carry out their work responsibilities
- Verify their right to work in the UK. We will keep a copy of this verification for the duration of the member of staff's employment and for 2 years afterwards
- Verify their professional qualifications, as appropriate
- Ensure they are not subject to a prohibition order if they are employed to be a teacher
- Carry out further additional checks, as appropriate, on candidates who have lived or worked outside of the UK, including (where relevant) any teacher sanctions or restrictions imposed by a European Economic Area professional regulating authority, and criminal records checks or their equivalent
- Check that candidates taking up a management position are not subject to a prohibition from management (section 128) direction made by the secretary of state
- Ask for written information about previous employment history and check that information is not contradictory or incomplete.
- Staff and volunteers who provide early years or later years childcare and any managers of such childcare are covered by the disqualification regulations of the Childcare Act 2006 and are required to declare relevant information - see statutory guidance: Disqualification under the Childcare Act 2006 (August 2018).

We will seek references on all short-listed candidates, including internal candidates, before interview. We will scrutinise these and resolve any concerns before confirming appointments.

Regulated activity means a person who will be:

- Responsible, on a regular basis in a school or college, for teaching, training, instructing, caring for or supervising children
- Carrying out paid, or unsupervised unpaid, work regularly in a school or college where that work provides an opportunity for contact with children
- Engaging in intimate or personal care or overnight activity, even if this happens only once and regardless of whether they are supervised or not

Existing staff

- If we have concerns about an existing member of staff's suitability to work with children, we will carry out all the relevant checks as if the individual was a new member of staff. We will also do this if an individual moves from a post that is not regulated activity to one that is.
- We will refer to the DBS anyone who has harmed, or poses a risk of harm, to a child or vulnerable adult:

- Where the 'harm test' is satisfied in respect of the individual (i.e. that no action or inaction occurred but the present risk that it could was significant)
- Where the individual has received a caution or conviction for a relevant offence
- If there is reason to believe that the individual has committed a listed relevant offence, under the Safeguarding Vulnerable Groups Act 2006 (Prescribed Criteria and Miscellaneous Provisions) Regulations 2009
- If the individual has been removed from working in regulated activity (paid or unpaid) or would have been removed if they had not left

Agency and third-party staff

- We will obtain written notification from any agency or third-party organisation that it has carried out the necessary safer recruitment checks that we would otherwise perform. We will also check that the person presenting themselves for work is the same person on whom the checks have been made.

Contractors

- We will ensure that any contractor, or any employee of the contractor, who is to work at the college has had the appropriate level of DBS check. This will be:
 - An enhanced DBS check with barred list information for contractors engaging in regulated activity
 - An enhanced DBS check, not including barred list information, for all other contractors who are not in regulated activity but whose work provides them with an opportunity for regular contact with children
- We will obtain the DBS check for self-employed contractors.
- We will not keep copies of such checks for longer than 6 months.
- Contractors who have not had any checks will not be allowed to work unsupervised or engage in regulated activity under any circumstances.
- We will check the identity of all contractors and their staff on arrival at the college.

Trainee/student teachers

- Where applicants for initial teacher training are salaried by us, we will ensure that all necessary checks are carried out.
- Where trainee teachers are fee-funded, we will obtain written confirmation from the training provider that necessary checks have been carried out and that the trainee has been judged by the provider to be suitable to work with children.

Volunteers

- We will:
 - Never leave an unchecked volunteer unsupervised or allow them to work in regulated activity
 - Obtain an enhanced DBS check with barred list information for all volunteers who are new to working in regulated activity
 - Obtain an enhanced DBS check without barred list information for all volunteers who are not in regulated activity, but who have an opportunity to come into contact with children on a regular basis, for example, supervised volunteers
 - Carry out a risk assessment when deciding whether to seek an enhanced DBS check for any volunteers not engaging in regulated activity.

Governance

- All members of the governance will have an enhanced DBS check without barred list information and section 128 check. They will have an enhanced DBS check with barred list information if working in regulated activity

Appendix 4

Effects of domestic abuse on children and young people

The impact of domestic abuse on the quality of a child's or young person's life is very significant. Children and young people who live with domestic abuse are at increased risk of behavioural problems, emotional trauma, and mental health difficulties in adult life.

The impact of domestic abuse on children and young people can be wide-ranging and may include effects in any or all of the following areas:

Physical: Children and young people can be hurt either by trying to intervene and stopping the violence or by being injured themselves by the abuser. They may develop self-harming behaviour or eating disorders. Their health could be affected, as they may not be being cared for appropriately. They may have suicidal thoughts or try to escape or blank out the abuse by using drugs, alcohol or by running away.

Sexual: There is a high risk that children and young people will be abused themselves where there is domestic abuse. In homes where living in fear is the norm, and situations are not discussed, an atmosphere of secrecy develops, and this creates a climate in which sexual abuse could occur. In addition to this, children and young people may sometimes be forced to watch the sexual abuse of their mother/carer. This can have long-lasting effects on the sexual and emotional development of the child/young person.

Economic: The parent or carer of the child or young person may have limited control over the family finances. Therefore, there might be little or no money available for extra-curricular activities, clothing or even food, impacting on their health and development.

Emotional: Children and young people will often be very confused about their feelings – for example, loving both parents/carers but not wanting the abuse to continue. They may be given negative messages about their own worth, which may lead to them developing low self-esteem. Many children and young people feel guilty, believing that the abuse is their fault. They are often pessimistic about their basic needs being met and can develop suicidal thoughts. Some children and young people may internalise feelings and appear passive and withdrawn or externalise their feelings in a disruptive manner.

Isolation: Children and young people may become withdrawn and isolated; they may not be allowed out; and if there is abuse in the home, they are less likely to invite their friends round. Education may be disrupted in many ways, and this may contribute to their growing isolation. They may frequently be absent from college as they may be too scared to leave their mother alone. They may have to move away from existing friends and family – e.g. into a refuge or other safe or temporary accommodation.

Threats: Children and young people are likely to have heard threats to harm their mother/father. They may have been directly threatened with harm or heard threats to harm their pet. They also live under the constant and unpredictable threat of violence, resulting in feelings of intimidation, fear and vulnerability, which can lead to high anxiety, tension, confusion and stress.

This clearly highlights that living with domestic abuse has a significant impact on a child's ability to achieve the five outcomes as outlined in the Every Child Matters agenda:

- be healthy;
- stay safe;
- enjoy and achieve;
- make a positive contribution;
- achieve economic well-being.

What you might see in College

- Unexplained absences or lateness – either from staying at home to protect their parent or hide their injuries, or because they are prevented from attending school;
- Children and young people attending college when ill rather than staying at home;
- Children and young people not completing their assignments, or making constant excuses, because of what is happening at home;
- Children and young people who are constantly tired, on edge and unable to concentrate through disturbed sleep or worrying about what is happening at home;
- Children and young people displaying difficulties in their cognitive and college performance;
- Children and young people whose behaviour and personality changes dramatically;
- Children and young people who become quiet and withdrawn and have difficulty in developing positive peer relations;
- Children and young people displaying disruptive behaviour or acting out violent thoughts with little empathy for victims;
- Children and young people who are no trouble at all.

This list is not exhaustive – this is intended to give you an idea of some of the types of behaviour that could be presented.

What colleges can do

Colleges can create an environment which both promotes their belief and commitment that domestic abuse is not acceptable, and that they are willing to discuss and challenge it. For many victims, the college might be the one place that they visit without their abusive partner.

Research shows that the repeated use of physical, sexual, psychological and financial abuse is one of the ways in which male power is used to control women. The underlying attitudes which legitimate and perpetuate violence against women should be challenged by college.

Colleges can support individual children and young people by:

- Introducing a whole-college philosophy that domestic abuse is unacceptable;
- Responding to disclosures and potential child protection concerns; recognising that domestic abuse and forced marriage may be a child protection concern; policies and procedures must include domestic abuse;
- Giving emotional support – the child or young person might need referral to a more specialist service or need additional support to complete coursework, exams etc.;
- Providing somewhere safe and quiet;
- Improving the self-esteem and confidence of children and young people by:
 - offering them opportunities to take on new roles and responsibilities;
 - offering tasks which are achievable and giving praise and encouragement;
 - monitoring their behaviour and setting clear limits;
 - criticising the action, not the person;
 - helping them to feel a sense of control in their college lives;
 - involving them in decision making;
 - helping them to be more assertive;
 - respecting them as individuals;

Operation Encompass

Operation Encompass is to highlight that a Domestic Abuse Incident has taken place and the police have been called or visited the family home. It is about keeping an eye on changed behaviour and logging anything out of the ordinary. Our school receives Operation Encompass notifications via WCC Children's Portal daily from West Mercia Police.

The DSL's responsibility – the DSL should:

- The link to the children's portal is:
https://capublic.worcestershire.gov.uk/Chs_Portal/HomePage.aspx
- View the Operation Encompass website (www.operationencompass.org) for further information;
- Ensure the Safeguarding Education Adviser has up to date contact information;
- Ensure the Operation Encompass referral record document is retained in the same way as other child protection documents, in a secure place;
- Identify and brief a colleague who can deputise in his/her absence;
- Ensure that all teaching staff are aware of Operation Encompass and understand the confidential nature of any information passed to them and that this information must be treated in the same way as any other child protection information;
- Inform the Governing Body that the College is part of Operation Encompass and the Governor with responsibility for safeguarding should have a working knowledge of the principles;

On receiving a Domestic Abuse notification, the DSL should:

- complete the Operation Encompass referral record
- notify appropriate staff members
- If there's no change to the child's behaviour - just monitor and log the DA
- If the child displays poor behaviour choices /seems upset/withdrawn, offer the relevant support needed

Bear in mind

- Victim of incident may be anxious that the information will be shared inappropriately.
- Notification may not give details as to which parent is the perpetrator/victim – any disclosure to the 'wrong' parent could heighten risk.
- Need to be aware who is 'connected' to the child – e.g. TA/lunchtime supervisor may be child's relative / friend of the family.
- Inappropriate sharing of information could heighten the risk for the victim and/or the child.

If in doubt, consult with the Family Front Door (01905 822666)

Appendix 5: Online Safety

The use of technology has become a significant component of many safeguarding issues. Child sexual exploitation; radicalisation; sexual predation: technology often provides the platform that facilitates harm. An effective approach to online safety empowers a school or college to protect and educate the whole school or college community in their use of technology and establishes mechanisms to identify, intervene in, and escalate any incident where appropriate.

The breadth of issues classified within online safety is considerable, but can be categorised into three areas of risk:

- content: being exposed to illegal, inappropriate or harmful material; for example pornography, fake news, racist or radical and extremist views;
- contact: being subjected to harmful online interaction with other users; for example, commercial advertising as well as adults posing as children or young adults; and
- conduct: personal online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images, or online bullying.

Education

- Opportunities to teach safeguarding, including online safety. Resources that could support schools and colleges include:
- Be Internet Legends developed by Parent Zone and Google is a free internet safety curriculum with PSHE accredited lesson plans and teaching resources for Key Stage 2 pupils
- Disrespectnobody is Home Office advice and includes resources on healthy relationships, including sexting and pornography
- Education for a connected world framework from the UK Council for Internet Safety supports the development of the curriculum and is of particular relevance to RSHE education and Computing. It is designed, however, to be usable across the curriculum and beyond (covering early years through to age 18) and to be central to a whole school or college approach to safeguarding and online safety.
- PSHE association provides guidance to schools on developing their PSHE curriculum
- Teaching online safety in school is departmental guidance outlining how schools can ensure their pupils understand how to stay safe and behave online as part of existing curriculum requirements
- Thinkuknow is the National Crime Agency/CEOPs education programme with age specific resources
- UK Safer Internet Centre developed guidance and resources that can help with the teaching of the online safety component of the Computing Curriculum.

Protecting children

Governing bodies and proprietors should be doing all that they reasonably can to limit children's exposure to the above risks from the school's or college's IT system. As part of this process, governing bodies and proprietors should ensure their school or college has appropriate filters and monitoring systems in place.

Whilst considering their responsibility to safeguard and promote the welfare of children, and provide them with a safe environment in which to learn, governing bodies and proprietors should consider the age range of their pupils, the number of pupils, how often they access the IT system and the proportionality of costs vs risks.

The appropriateness of any filters and monitoring systems are a matter for individual schools and colleges and will be informed in part, by the risk assessment required by the Prevent Duty.

The UK Safer Internet Centre has published guidance as to what “appropriate” filtering and monitoring might look like: [UK Safer Internet Centre: appropriate filtering and monitoring](#).

Guidance on e-security is available from the National Education Network. Support for schools is available via the: [schools' buying strategy with specific advice on procurement here: buying for schools](#).

Whilst filtering and monitoring is an important part of the online safety picture for schools and colleges to consider, it is only one part. Governors and proprietors should consider a whole school or college approach to online safety. This will include a clear policy on the use of mobile technology in the school or college. Many children have unlimited and unrestricted access to the internet via 3G, 4G and 5G in particular and the school and college should carefully consider how this is managed on their premises.

Whilst it is essential that governing bodies and proprietors ensure that appropriate filters and monitoring systems are in place, they should be careful that “over blocking” does not lead to unreasonable restrictions as to what children can be taught with regard to online teaching and safeguarding.

The Prevent duty Departmental advice for schools and childcare providers and Prevent Duty Guidance For Further Education Institutions

Reviewing online safety

Technology in this area evolves and changes rapidly. A free online safety self-review tool for schools can be found via the [360 safe website](#). UKCIS has published [Online safety in schools and colleges: Questions for the governing board to help responsible bodies assure themselves that their online safety arrangements are effective](#).

Education at home

Where children are being asked to learn online at home the department has provided advice to support schools and colleges do so safely: [safeguarding-in-schools-colleges-and-other-providers and safeguarding-and-remote-education](#)

Staff Training

Governors and proprietors should ensure that, as part of the requirement for staff to undergo regularly updated safeguarding training and the requirement to ensure children are taught about safeguarding, including online safety, that online safety training for staff is integrated, aligned and considered as part of the overarching safeguarding approach.

Information and Support

There is a wealth of information available to support schools, colleges and parents/carers to keep children safe online. The following list is not exhaustive but should provide a useful starting point:

- [Advice for governing bodies/proprietors and senior leaders](#)
- [Childnet provide guidance for schools on cyberbullying](#)
- [Educateagainsthate provides practical advice and support on protecting children from extremism and radicalisation](#)
- [London Grid for Learning provides advice on all aspects of a school or college's online safety arrangements](#)
- [NSPCC provides advice on all aspects of a school or college's online safety arrangements](#)
- [Safer recruitment consortium “guidance for safe working practice”, which may help ensure staff behaviour policies are robust and effective](#)
- [Searching screening and confiscation is departmental advice for schools on searching children and confiscating items such as mobile phones](#)

- South West Grid for Learning provides advice on all aspects of a school or college's online safety arrangements
- Use of social media for online radicalisation - A briefing note for schools on how social media is used to encourage travel to Syria and Iraq
- UK Council for Internet Safety have provided advice on sexting-in-schools-and-colleges and using-external-visitors-to-support-online-safety-education
- Remote education, virtual lessons and live streaming • Case studies on remote education practice are available for schools to learn from each other
- Departmental guidance on safeguarding and remote education including planning remote education strategies and teaching remotely • London Grid for Learning guidance, including platform specific advice • National cyber security centre guidance on choosing, configuring and deploying video conferencing • National cyber security centre guidance on how to set up and use video conferencing • UK Safer Internet Centre guidance on safe remote learning
- Support for children
- Childline for free and confidential advice
- UK Safer Internet Centre to report and remove harmful online content
- CEOP for advice on making a report about online abuse

Parental Support

- Childnet offers a toolkit to support parents and carers of children of any age to start discussions about their online life, to set boundaries around online behaviour and technology use, and to find out where to get more help and support
- Commonsensemedia provide independent reviews, age ratings, & other information about all types of media for children and their parents
- Government advice about protecting children from specific online harms such as child sexual abuse, sexting, and cyberbullying
- Government advice about security and privacy settings, blocking unsuitable content, and parental controls
- Internet Matters provide age-specific online safety checklists, guides on how to set parental controls on a range of devices, and a host of practical tips to help children get the most out of their digital world
- Let's Talk About It provides advice for parents and carers to keep children safe from online radicalisation
- London Grid for Learning provides support for parents and carers to keep their children safe online, including tips to keep primary aged children safe online
- Lucy Faithfull Foundation StopItNow resource can be used by parents and carers who are concerned about someone's behaviour, including children who may be displaying concerning sexual behaviour (not just about online)
- National Crime Agency/CEOP Thinkuknow provides support for parents and carers to keep their children safe online
- Net-aware provides support for parents and carers from the NSPCC and O2, including a guide to social networks, apps and games
- Parentzone provides help for parents and carers on how to keep their children safe online
- Parent info from Parentzone and the National Crime Agency provides support and guidance for parents from leading experts and organisations

- UK Safer Internet Centre provide tips, advice, guides and other resources to help keep children safe online

Appendix 6



Hints & Tips for Safeguarding when remote / Working Online with students

College Safeguarding Policy

<https://portal.howcollege.ac.uk/policies/layouts/15/WopiFrame.aspx?sourcedoc=/policies/Policies/Safeguarding%20Policy%202019-20%20v2.pdf&action=default>

Only use College registered accounts, don't use personal accounts or personal mobiles	Only use systems that are recommended by the college such as Teams. If in doubt check first	Report any incidents or actions that cause concern
When using video, use a safe and appropriate place (i.e. not a bedroom) and ensure no inappropriate objects/information is visible. Blur your background	Be courteous, introduce yourself. Treat this like a normal face to face meeting with a student	Be mindful that our Esafe system of monitoring student behaviour and inappropriate conversations won't be available in the same way
Consider the needs of vulnerable students and those with SEND. Remember LSA's and PLCs are available to support	Ensure that others within your location or household are aware if you are on camera	Remember to turn off chat facilities for learners so they are not left to chat without you facilitating
Keep the same boundaries for your availability i.e. college opening times	Tone, language and dress should be professional to maintain some formality as in a normal lesson	Remember Esafe is still in operation for staff
Take extra care with any one to ones and where possible only use audio	Use audio where possible	Remember the safeguarding policy and reporting process
Seek permission from everyone involved if you are recording a session	Consider how students can ask questions or get help in the session	Set out ground rules including when can students speak and how
If you don't understand the system, seek support or ask someone who can help	Remember all the same safeguarding principles apply here, remain vigilant	Don't use social media sites to make contact with students unless approved

Safeguarding Phones :

Monday to Thursday 9am to 4.30pm (4pm on Friday) **Redditch:** 07881 379 252 **Worcester:** 07789 754161