



## Safeguarding Policy (including Child Protection, Peer on Peer Abuse, Sexual Violence and Harassment and Prevent)

**For completion by The Executive**

Strategic Theme (7Ps)	Purpose		Place		People	x	Prosper	
	Partnership		Potential		Planet			
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Postholder Responsible for Review (job title)	Head of Student Support and Wellbeing							
Authorised By: (ELT/Corporation)	Corporation 09 Sept 2025							
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### For completion by The Author

Version control	Date and Details of Change (Author)
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	<p><b>Statement relating to ongoing ratification College's Safeguarding Policy.</b></p> <p>The College adopts the model policy produced by Worcestershire County Council and incorporates any changes in KCSIE and adapts this for practice at Heart of Worcestershire College. Due to the changes that are made to the policy during the academic year, the Governing body have agreed that this policy will be formally agreed and ratified annually at the Autumn Full Governor Meeting. The Full Governing Body have agreed that if the Local Authority make changes made to the model policy during the year, or if new guidance is received 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.</p> <p>Point to note Heart of Worcestershire College, as a post 16</p>

	provider, will continue to use the term Peer on Peer rather than adopt terminology in KCSIE 2025 Child on Child as agreed by WCC Safeguarding in Education Advisor, Denise Hannibal
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## 1. Purpose

This policy outlines the College's commitment to safeguarding all students and staff. The purpose of this safeguarding policy is to ensure the safety and well-being of all learners, staff, and visitors within Heart of Worcestershire College. It aims to create a secure and supportive setting where individuals are protected from harm, abuse, neglect, and exploitation. The policy outlines the responsibilities of staff and stakeholders in identifying, reporting, and responding to safeguarding concerns, and promotes a culture of vigilance, accountability, and continuous improvement in safeguarding practices.

## 2. Scope

This policy applies to:

- All staff, contractors and visitors.
- On-campus, off-campus, online environments.

## 3. Policy Statement

The College is committed to fostering an inclusive, safe and supportive environment where individuals are protected from harm, abuse, neglect and exploitation.

## 4. Definitions

DBS	Disclosure and Barring Service
DfE	Department for Education
WSCP	Worcestershire Safeguarding Children Partnership
DSL	Designated Safeguarding Lead
DDSL	Deputy Designated Safeguarding Lead
FGM	Female Genital Mutilation
CCE	Child Criminal Exploitation
CSE	Child Sexual Exploitation
LADO	Local Authority Designated Officer
KCSIE	Keeping Children Safe in Education
CLA	Child Looked After
FFD	Family Front Door
MARAC	Multi Agency Risk Assessment Conference
UKCCIS	UK Council for Child Internet Safety
SENDIASS	Special Educational Needs and Disabilities Information and Support Services
CTU	Counter Terrorism Unit
HBA	Honour Based Abuse
NCA	National Crime Agency
APWG	Anti Phishing Working Group
CIN	Child In Need
CP	Child Protection
GDPR	General Data Protection Regulation
SoS	Secretary of State
EFSA	Education Skills Funding Agency
SEND	Special Educational Needs and Disability
SENCo	Special Educational Needs Coordinator

CAMHS	Child and Adolescence Mental Health Service
HR	Human Resources
SWGFL	South West Grid For Learning
CSA	Child Sexual Abuse
WCC	Worcestershire County Council

## 5. Roles and Responsibilities

### 5.1 Governing Body

**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, procedures and training are in place which are always effective and comply with the law.
- Safeguarding policies are available to parents on the College website or by other means and reviewed annually;
- **All** governors and trustees receive appropriate safeguarding and child protection (including online) training at induction. This training will equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place in Heart of Worcestershire College are effective and support the delivery of a robust whole College approach to training. Their training will be updated regularly.
- 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) 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.

### 5.2 Principal and Senior Leaders

**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.

### **5.3 Staff**

All staff must comply with the policy and participate in relevant training.

### **5.4 Students**

Follow the policy and report any breaches.

## **6. Procedures**

Full details in policy below.

## **7. Monitoring and Review**

- This policy will be monitored and reviewed annually.
- Wherever necessary the policy will be amended as and when changes in legislation or emerging themes occur in between annual reviews.

## **8. Legal and Regulatory Framework**

- Children Act 1989/2004
- The Children and Families Act 2014
- 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 Children and Social Work Act 2017. Equality Act 2010
- The Children and Families Act 2014
- The Protection of Freedoms Act 201 Sexual Offences Act 2003
- Sexual Harassment and sexual violence advice 2021
- 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 2020
- The Rehabilitation of Offenders Act 1974
- Home Office (2023) 'Prevent duty guidance: Guidance for specified authorities in England and Wales'
- DfE (2023) 'Working Together to Safeguard Children 2023'
- DfE (2018) 'Disqualification under the Childcare Act 2006'
- DfE (2024) 'Keeping children safe in education 2025'
- HM Government (2020) 'multi-agency statutory guidance on female genital mutilation'
- HM Government (2023) 'Channel Duty Guidance: Protecting people susceptible to radicalisation'
- Home Office and Foreign, Commonwealth and Development Office (2023) 'multi-agency statutory guidance for dealing with forced marriage and multi-agency practice guidelines: Handling cases of forced marriage'

### **Other non-statutory Guidance**

- DfE (2015) 'What to do if you're worried a child is being abused'
- DfE (2017) 'Child sexual exploitation'
- DfE (2024) 'Information sharing'
- DfE (2024) 'Sharing nudes and semi-nudes: advice for education settings working with children and young people'

- DfE (2021) 'Teachers' Standards'
- DfE (2024) 'Recruit teachers from overseas'
- DfE (2024) 'Working together to improve school attendance'
- DfE (2024) 'Meeting digital and technology standards in schools and colleges'

## **9. Training and Awareness**

All staff must complete mandatory safeguarding training, sexual violence and harassment every 3 years, Prevent every 2 years, safeguarding briefings at least annually, cybersecurity annually and Keeping Children Safe in Education annually.

## **10. Environmental Impact/Sustainability Considerations (if applicable)**

All safeguarding records are held on unit-e and not paper based. Safeguarding files from schools are requested electronically.

## **11. Legal Requirements/Issues outside of Equality, Diversity and Inclusion**

This policy has been developed in line with the following Statutory key documents:

## **12. Equality Impact Assessment Statement**

The Equality Act 2010 does not require public authorities to carry out EIAs by law. The College does however, carefully consider the impact, when creating or amending its policies, on all concerned parties regarding Equality, Diversity and Inclusion and records this at ELT meetings in order to demonstrate compliance with Public Sector Equality Duty (PSED).

## **13. Related Policies and Documents**

Student Standards / Data Protection & GDPR Policy / Search Policy / Prevent Strategy / Whistleblowing / Criminal Convictions Procedure / Disciplinary Policy & Procedure (Staff) / Equality Policy / Health & Safety Policy / Professional Code of Standards for Staff / Visiting External Speakers Policy / Fitness to Study Procedures / Email & Internet Policy for Staff, Students & Governors / Recruitment & Selection of Staff Policy / Managing Allegations Policy / Room Hire Policy / Charity Policy / Security Policy

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## 14. Key Safeguarding Staff Contact Details

<b>Designated Safeguarding Lead (DSL)</b> <b>Prevent Single Point of Contact (SPOC)</b> <b>CSE single point of contact</b>	Julia Breakwell <b>Vice Principal Student Experience and Support</b> Tel: 01527 572599 Mobile: 07525 800 571 (available during college opening times) Email: <a href="mailto:jbreakwell@howcollege.ac.uk">jbreakwell@howcollege.ac.uk</a>
<b>Deputy Designated Safeguarding Lead</b> <b>Mental Health Lead</b>	Sal Friel <b>Head of Student Support and Wellbeing</b> Tel: 01527 572525 Mobile: 07967 445 749 (available during college opening times) Email: <a href="mailto:sfriel@howcollege.ac.uk">sfriel@howcollege.ac.uk</a>
<b>Safeguarding Governor</b>	Steve Stanier
<b>College Safeguarding Teams</b>  Worcester & Malvern          Bromsgrove & Redditch	Madeleine Penny <b>Wellbeing and Safeguarding Coordinator</b> Tel: 01527 527649 Mobile: 07967 445 558 Email: <a href="mailto:mpenny@howcollege.ac.uk">mpenny@howcollege.ac.uk</a>  Deborah Bird Wellbeing and Safeguarding Officer Tel: 01905 725534 Mobile: 07789 754 161 Email: <a href="mailto:dbird@howcollege.ac.uk">dbird@howcollege.ac.uk</a> Trudy Hazeldine Wellbeing and Safeguarding Officer Tel: 01527 405461 Mobile: 07912 783 040 Email: <a href="mailto:thazeldine@howcollege.ac.uk">thazeldine@howcollege.ac.uk</a>  Wendy Sutton Student Support Officer for Care Experienced and Unaccompanied Asylum Seekers Tel: 07932 428 432 Email: <a href="mailto:wsutton@howcollege.ac.uk">wsutton@howcollege.ac.uk</a> <b>Designated teacher for children in care</b>  Helen Wood Wellbeing and Safeguarding Officer Tel: 01527 572811 Mobile: 07881 379 253 Email: <a href="mailto:hwood@howcollege.ac.uk">hwood@howcollege.ac.uk</a>  Jeanette Teece

	<p>Wellbeing and Safeguarding Tel: 01527 572899 Mobile: 07811 379 252 Email: <a href="mailto:jteece@howcollege.ac.uk">jteece@howcollege.ac.uk</a></p> <p>Kate Gordon Wellbeing and Safeguarding Officer Tel: 01527 572554 Mobile: 07525 800 573 Email: <a href="mailto:kgordon@howcollege.ac.uk">kgordon@howcollege.ac.uk</a></p>
<b>Safeguarding reporting Mobile numbers</b>	<p>Redditch/Bromsgrove 07881379252 Worcester/Malvern 07789754161 (available during College daytime opening hours)</p>

### 15. '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.

The College fully recognises its moral and statutory responsibilities for safeguarding and promoting the welfare of all students, staff and visitors but has particular responsibilities to those under 18 years, and those who are vulnerable adults. This policy seeks to ensure the safety and welfare of all those learners under 18 years and those who are vulnerable adults.

Specifically, the College will seek to provide a safe environment for students to learn and to identify those suffering or likely to suffer significant harm and to take appropriate action to ensure that these students are kept safe.

We recognise that because of the day-to-day contact with young people and vulnerable adults, College staff are well placed to observe the outward signs of abuse. The College will therefore:

- Establish and maintain an environment where young people and vulnerable adults feel secure, are encouraged to talk and are listened to;
- Ensure that young people know that there is a dedicated Safeguarding Team whom they can approach if they are worried
- Ensure that there are dedicated sessions within the Tutorial Framework (THRIVE) and throughout the curriculum for young people and vulnerable adults to develop the skills they need to recognise and stay safe from abuse, including via the internet and other technologies.
- Operate safer recruitment procedures and make sure that all appropriate checks are carried out on new staff and volunteers who will work with children; including identity, right to work, enhanced DBS, criminal record and barred list, and references;
- Criminal history and suitability to work with children information should only be requested from applicants who have been shortlisted.
- As part of the shortlisting process schools and colleges should consider conducting an online search as part of their due diligence on the shortlisted candidates. This may help identify any incidents or issues that have happened, and are publicly available online, which the school or college might want to explore with the applicant at interview.
- Ensure every effort is made to establish effective working relationships with parents/carers and



- colleagues from other agencies;
- Within our local area statistics show that in June 2025 (most up to date data at time of publication) that **violence and sexual offences** are the highest crime committed and therefore, is a particular focus for the college. Data taken from <https://www.crime-statistics.co.uk>

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 Safeguarding Lead (DSL) or the Deputy Designated Safeguarding Lead

## 16. Safeguarding Procedures

The college will follow the procedures set out by the Worcestershire County Council Multi Agency Level of Need in line with Keeping Students Safe in Education 2025 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 Safeguarding Lead. This is the Vice Principal Student Experience and Support. The DSL will ensure that Safeguarding policies and procedures are fully implemented and followed by all staff. The Head of Student Support and Wellbeing 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 their 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 Criminal Exploitation (CCE) 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 their 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.
- Ensure Safeguarding staff are aware of West Midlands Safeguarding Children procedures and WCC levels of need guidance.
- **All our staff** should be aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. For example, children may feel embarrassed, humiliated, or being threatened. This could be due to their vulnerability, disability and/or sexual orientation or language barriers. This should not prevent staff from having a professional curiosity and speaking to the DSL if they have concerns about a child. It is also important that staff determine how best to build trusted relationships with children and young people which facilitate communication.
- In line with Government guidelines in KCSIE 2025, our College will where reasonably possible, hold two or more emergency contact numbers per student. This provides the College with additional options for contacting a responsible adult when a child is missing school and is also identified as a welfare and/or

safeguarding concern.

## **17. Training Guidelines**

- 17.1 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, Part one of Keeping Children Safe in Education and informed who the DSL is and who acts in their absence and what this role includes.
- 17.2 All staff are required to undertake a mandatory training session on Safeguarding and Prevent and Sexual Violence and Sexual Harassment 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, online-safety and advice on safe working practices. The training includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring. Full training will be refreshed at least every 3 years for safeguarding and sexual violence and harassment, every 2 years for Prevent and annually for cybersecurity and safeguarding briefings. In addition, they will receive safeguarding and child protection, including online safety, updates as required, but at least annually to continue to provide them with relevant skills and knowledge to safeguard children effectively. Safeguarding information will be shared on the safeguarding tile held on the staff portal. Each year all staff working in college will be required to read part one of Keeping Children Safe in Education, to sign to acknowledge they have completed this and required to pass a short test to confirm their understanding.
- 17.3 All volunteers, regular contractors, agency staff and regular visitors to the college will be told where to access our policy, required to complete the mandatory training which includes safeguarding, read Annex A of Keeping Children Safe in Education and given the name of the DSL and Deputy and informed of the College's procedures in reporting concerns.
- 17.4 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 local authority led briefings, network meetings and seminars, at regular intervals, at least annually.
- 17.5 Key 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 as required.

## **18 Responsibilities of Heart of Worcestershire College**

- 18.1 **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;
- i. Safeguarding policies, procedures and training are in place which are always effective and comply with the law.
  - ii. Safeguarding policies are available to parents on the College website or by other means and reviewed annually;

- iii. **All** governors and trustees receive appropriate safeguarding and child protection (including online) training at induction. This training will equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place in Heart of Worcestershire College are effective and support the delivery of a robust whole College approach to training. Their training will be updated regularly.
- iv. 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;
- v. An annual report on the effectiveness of the College's safeguarding procedures is presented to the governing body;
- vi. Any weaknesses brought to its attention relating to safeguarding are remedied without delay.
- vii. The DSL and Deputy DSL role is explicit in the postholders' job descriptions;
- viii. Any returns requested by the Local Authority/Worcestershire Safeguarding Children's Partnership (e.g. s175 audit) completed in a timely manner to enable the WSCP to meet its statutory duties
- ix. 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.
- x. The College contributes to inter-agency working in line with statutory guidance.
- xi. 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:

1. 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.
2. 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.
3. All allegations of abuse by staff are reported to the LADO in a timely manner.
4. 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**

Heart of Worcestershire College ensures 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. The DSL role is 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. 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. (WCC 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:

1. Organising mandatory safeguarding training and for all newly appointed staff and regular refresher training sessions to enable staff to update as required;
2. 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;
3. Providing information to the WSCP/Local Authority on safeguarding and child protection in compliance with section 14B of the Children Act 2004.
4. Undertaking, in conjunction with the Principal and Safeguarding Governor, an annual audit of safeguarding procedures, using the County safeguarding checklist;
5. 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;
6. Referring a young person to the Channel Panel when there are concerns about possible radicalisation or involvement in extremist groups;
7. Keeping written records of concerns about young people and vulnerable adults, even where there is no need to refer the matter immediately;
8. Ensuring all child protection records are kept securely and in locked locations;
9. 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;

10. 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;
11. Monitoring unauthorised absence, particularly where young people or vulnerable adults go missing on repeated occasions;
12. 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;
13. Contributing to assessments and providing reports to initial and review conferences which, where appropriate, have been shared with parents first;
14. 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;
15. Encourage a culture of listening to children/young people and taking account of their wishes and feelings, among all staff;
16. Act as a source of support, advice and expertise for all staff.
17. Liaise with the Head of HR in relation to DBS referrals that are required in regard to staff, further to allegations and investigation outcomes.
18. Act as a source of advice and expertise for managers/HR undertaking investigations into safeguarding matters which relate to staff conduct.

## **19 Procedures for Managing Concerns**

- a. Our College adheres to child protection procedures that have been agreed locally through Safeguarding Worcestershire  
<https://www.safeguardingworcestershire.org.uk>
- b. Where we identify children and families in need of support, we will carry out our responsibilities in accordance with the West Midlands Safeguarding Children Procedures. [Welcome to the West Midlands Regional Safeguarding...](#)
- c. 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;
- d. 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.

- e. 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.
- f. The Designated Safeguarding Lead (DSL) or Deputy DSL and the Safeguarding team 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.
- g. Following receipt of any information raising concern, the DSL/Deputy DSL/Safeguarding Team 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.
- h. All referrals will be made in line with local procedures as detailed on the Worcestershire County Council 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.
- i. 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.'
- j. 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.
- k.

Children missing from education, particularly persistently, can act as a vital warning sign to a range of safeguarding issues including neglect, sexual abuse, and child sexual and criminal exploitation. It is important the school or college's response to children missing from education supports identifying such abuse and helps prevent the risk of them going missing in the future. This includes when problems are first emerging but also where children are already known to local authority children's social care and need a social worker (such as on a child in need or child protection plan, or as a looked after child), where going missing from education may increase known safeguarding risks within the family or in the community. Children at risk of missing in education are set out below:

Children of compulsory school age who are:

- Not on a school roll
- Not being educated other than at school
- Identified as having been out of any educational provision for a substantial period of time (4 weeks)

Children go missing from education for a number of reasons including:

- They don't start school at the appropriate time and so they do not enter the educational system
- They are removed by their parents
- Behaviour and/or attendance difficulties
- They cease to attend, due to exclusion, illness or bullying
- They fail to find a suitable school place after moving to a new area
- The family move home regularly
- Problems at home

Further information for colleges providing education for a child of compulsory school age can be found in: [Full-time-Enrolment of 14 to 16 year olds in Further Education and Sixth Form Colleges](#).

General information and advice for schools and colleges can be found in the Government's [Missing Children and Adults Strategy](#).  
[Keeping children safe in out-of-school settings](#)

## **21 Children with family members in prison**

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.

## **22 Child Criminal Exploitation (CCE)**

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.

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.

Children can become trapped by this type of exploitation as perpetrators can threaten victims (and their families) with violence or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others. As children involved in criminal exploitation often commit crimes themselves, their vulnerability as victims is not always recognised by adults and professionals, (particularly older children), and they are not treated as victims despite the harm they have experienced. They may still have been criminally exploited even if the activity appears to be something they have agreed or consented to.

It is important to note that the experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however professionals should be aware that girls are at risk of criminal exploitation too. It is also important to note that both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

## **23 Child Sexual Exploitation (CSE)**

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.

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.

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.

The DSL will use the Worcestershire 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.

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.

## **24 Child Trafficking and Human Slavery**

Our College will ensure we keep up to date on the latest advice and guidance provided to assist in addressing specific vulnerabilities and forms of exploitation and access support, advice, and resources via GET SAFE, Worcestershire County council multi agency exploitation team.

## 25 County Lines

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”.

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.

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.

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.

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 Mechanism<sup>103</sup> 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.

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

### 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.

### 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.

### 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.

#### 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.

#### Trap line

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

When a child is identified as may be at risk of exploitation the DSL/DDSL will work with and support and consider completion of a GET SAFE risk assessment which will be referred to Worcestershire County Council Get Safe team for further assessment and support. They will also consider referral to Worcestershire Family Front Door as part of our local safeguarding procedures. More information can be found : [Get Safe | Worcestershire County Council](#)

## 26 Domestic Abuse

- a. 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.
- b. Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional. Children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn.
- c. 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.
- d. Where we identify a victim of domestic abuse being high risk. We will consider a referral to MARAC (multi agency risk assessment conference). The purpose of MARAC is to share information and establish a multi-agency action plan to support the victim and to make links with other public protection procedures, particularly safeguarding children, vulnerable adults and the management of offenders. We will continue to provide help and support in order to safeguard children. This will usually be led by the DSL. MARAC does not replace a referral to children social care.

## 27 OPERATION ENCOMPASS

In our College we receive Operation Encompass Notifications including any reported to our Wellbeing and Safeguarding Coordinator. Operation Encompass highlights that a Domestic Abuse Incident has taken place, and the police have been called. As part of the support, we then offer following these notifications, we ensure that staff maintain a close eye on the child, informing the DSL of any changes with regards to their behaviour, and reporting and recording

anything out of the ordinary. Operation Encompass is working well in Worcestershire Schools and Worcestershire County Council successfully send DA notifications to schools. It helps police and schools work together to provide emotional and practical help to children. The system ensures that when police are called to an incident of domestic abuse, where there are children in the household who have experienced the domestic incident, they inform Worcestershire County Council, who then inform the school via the DSL, before the child or children arrive at school the following day. This information sharing ensures relevant information about the child's circumstances are received in a timely manner and therefore as a school we enable support to be given to the child according to their needs.

[https://www.worcestershire.gov.uk/info/20923/domestic\\_abuse/885/domestic\\_abuse](https://www.worcestershire.gov.uk/info/20923/domestic_abuse/885/domestic_abuse)

## **28 Homelessness**

- 28.1 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.
- 28.2 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.
- 28.3 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.
- 28.4 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: [Provision of accommodation for 16 and 17 year olds who may be homeless and/or require accommodation - GOV.UK \(www.gov.uk\)](#)

## **29 Peer on Peer (referred to as child on child in KCSIE 25) Abuse including Sexual Violence and Harassment (see appendix 7)**

- 29.1 All our staff are aware that children and or young people can abuse other children/young people (often referred to as peer-on-peer abuse) and that it can happen both inside and outside of college and online. It is important that all staff recognise the indicators and signs of peer-on-peer abuse and know how to identify it and respond to reports.

All our staff understand, that even if there are no reports in our college it does not mean it is not happening, it may be the case that it is just not being reported. As such it is important if staff

have **any** concerns regarding peer-on-peer abuse, they should speak to their designated safeguarding lead (or deputy).

Staff should report any incidences through to the Safeguarding team/DSL/Deputy DSL following the College's safeguarding procedures. Students are able to anonymously report incidences via the Whisper report: [Whisper Reporting](#)

- 29.2 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, sharing of nudes and semi-nudes, both consensual and non-consensual; 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.
- 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 (this may include an online element which facilitates, threatens and/or encourages physical abuse);
    - Sharing of nudes and semi-nudes both consensual and non-consensual.
    - Initiation/hazing type violence and rituals.
  - The Voyeurism (Offences) Act, which is commonly known as the Up-skirting Act, came into force on 12 April 2019. Up-skirting, 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. This abuse can:
    - Be motivated by perceived differences e.g., on grounds of race, religion, gender, sexual orientation, disability or other differences.
    - Result in significant, long lasting and traumatic isolation, intimidation or violence to the victim; vulnerable adults are at particular risk of harm.
  - Children or young people who harm others may have additional or complex needs e.g.
    - Significant disruption in their own lives.
    - Exposure to domestic abuse or witnessing or suffering abuse.
    - Educational under-achievement.
    - Involved in crime.

- 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 young person discloses peer on peer sexual violence or harassment against another student in the same setting, the DSL should refer to the Worcestershire County Council website and seek advice from the Family Front Door 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 2021 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 DSL: 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.
- 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.

## 30 Sexual Violence and Sexual Harassment

Sexual Violence and Sexual Harassment can occur between two children/young people of any age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Sexual violence and sexual harassment exist on a continuum and may overlap; they can occur online and face to face (both physically and verbally) and are never acceptable.

The College recognises the term '**victim**' to refer to those who have been subjected to abuse. And also recognise that not every victim will view themselves as such, also we use

the term '**alleged perpetrator(s)**' and where appropriate '**perpetrator(s)**.' Though they caution the use of this term as in some cases the abusive behaviour will have been harmful to the perpetrator as well.

Sexually harmful behaviour from young people is not always contrived or with the intent to harm others. There may be many reasons why a young person engages in sexually harmful behaviour and it may be just as distressing to the young person who instigates it as to the young person it is intended towards. Sexually harmful behaviour may include:

- inappropriate sexual language
  - inappropriate role play
  - sexual touching
  - sexual assault/abuse
- In the instance of sexual violence or sexual harassment being disclosed, staff must follow the College's safeguarding procedures. The Safeguarding team will consider:
    - the nature of the alleged incident(s), including whether a crime may have been committed and the consideration of harmful sexual behaviour;
    - the ages of the young people involved
    - the developmental stages of the young people involved
    - any power imbalance between the children. For example, is the alleged perpetrator(s) significantly older, more mature or more confident. If the victim has a disability or learning difficulty
    - if the alleged incident is a one-off or a sustained pattern of abuse (sexual abuse can be accompanied by other forms of abuse and a sustained pattern may not just be of a sexual nature).

### **31 Special Educational Needs and Disability (SEND)**

We recognise that young people with special educational needs or certain medical or physical health conditions can face additional safeguarding challenges both online and offline and these are discussed in staff training. We ensure our safeguarding policy reflects the fact that additional barriers can exist when recognising abuse and neglect in this group of young people. 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;
- These young people being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children
- young people with SEN or certain medical conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs
- communication barriers and difficulties in managing or reporting these challenges
- Cognitive understanding – being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in schools or colleges or the consequences of doing so.

Any reports of abuse involving young people with SEND will therefore require close liaison with the Designated Safeguarding Lead (or a Deputy) and the SENCO or the named person with oversight for SEND in a college.

We consider extra pastoral support and attention for these young people, along with ensuring any appropriate support for communication is in place.

SEND Code of Practice 0 to 25 years, and Supporting Pupils at School with Medical Conditions.

And from specialist organisations such as:

- The Special Educational Needs and Disabilities Information and Support Services (SENDIASS). SENDIASS offer information, advice and support for parents and carers of children and young people with SEND. All local authorities have such a service: Find your local IAS service ([councilfordisabledchildren.org.uk](http://councilfordisabledchildren.org.uk))
- Mencap - Represents people with learning disabilities, with specific advice and information for people who work with children and young people

## 32 Children with additional vulnerabilities

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. Extremism and Radicalisation

## 15 Prevent

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.

As with other forms of safeguarding strategies, early intervention is always preferable. We are committed to working with the local authority and other local partners, families, and communities to play a key role in ensuring young people and our communities are safe from the threat of:

- **Extremism** – such as the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. We also include in our definition of extremism calls for the death of members of our armed forces, whether in this country or overseas.
- **Radicalisation** – such as the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.
- **Terrorism** – defined as an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious, or ideological cause.

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 / West Mercia procedures and will represent our College at Channel meetings as required.

[https://www.westmercia.police.uk/advice/advice-and-information/t/prevent/prevent/alpha/prevent-referral/ctu\\_gateway@westmidlands.police.uk](https://www.westmercia.police.uk/advice/advice-and-information/t/prevent/prevent/alpha/prevent-referral/ctu_gateway@westmidlands.police.uk)

- 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, following normal safeguarding procedures. If the matter is urgent then West Mercia 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).

### 33 'Honour Based' Abuse, Female Genital Mutilation (FGM) and Forced Marriage

Honour-Based' abuse (HBA) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as **breast ironing**. Abuse committed in the context of preserving "honour" often involves a wider network of family or community pressure and can include multiple perpetrators. We are aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take. All forms of HBA are abuse (regardless of the motivation) and are handled and escalated as such. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBA, or already having suffered HBA.

The right to choose: gov guidance on forced marriage  
2023 Forced Marriage Guidance

#### **Actions**

If staff have a concern regarding a child that might be at risk of HBA or who has suffered from HBA, they should speak to the Designated Safeguarding Lead (or Deputy). As appropriate, they will activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and children's social care. Where FGM has taken place, since 31 October 2015 there has been a mandatory reporting duty placed on teachers.

33.1 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 multiagency liaison with police and children's social care.

33.2 **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

33.3 **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.

Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the

Serious Crime Act 2015) places a statutory duty upon teachers along with regulated health and social care professionals in England and Wales, to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. It should not be transferred to the Designated Safeguarding Lead; however the DSL should be informed.

Those failing to report such cases may face disciplinary sanctions. It will be rare for teachers to see visual evidence, and they should not be examining pupils or students, but the same definition of what is meant by “to discover that an act of FGM appears to have been carried out” is used for all professionals to whom this mandatory reporting duty applies. Information on when and how to make a report can be found at: [Mandatory reporting of female genital mutilation procedural information](#)

Teachers must and will personally report to the police cases where they discover that an act of FGM appears to have been carried out. Unless a teacher has good reason not to, we will still consider and discuss any such case with the school's or college's designated safeguarding lead (or deputy) and involve children's social care as appropriate. The duty does not apply in relation to at risk or suspected cases (i.e. where the teacher does not discover that an act of FGM appears to have been carried out, either through disclosure by the victim or visual evidence) or in cases where the woman is 18 or over. In these cases, teachers should follow local safeguarding procedures. The following is a useful summary of the FGM mandatory reporting duty: [FGM Fact Sheet](#).

- 33.4** 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.

### **Forced Marriage**

- 33.5** 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.

The Forced Marriage Unit has published statutory guidance and Multi-agency guidelines, of which focus on the role of schools and colleges. Our staff can contact the Forced Marriage Unit if they need advice or information: Contact: 020 7008 0151 or email [fmf@fco.gov.uk](mailto:fmf@fco.gov.uk). In addition, since February 2023 it has also been a crime to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday, even if violence threats or another form of coercion are not used. As with the existing forced marriage law, this applies to non-binding, unofficial 'marriages' as well as legal marriages.

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

## 34 Modern Slavery

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.

## 35 Online Safety

35.1 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 four areas of risk:

- **content:** being exposed to illegal, inappropriate or harmful material; for example, pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism
- **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 adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.
- **conduct:** being subjected to harmful online interaction with other users; for example, commercial advertising as well as adults posing as children or young adults; and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.
- **conduct:** behaviour that increases the likelihood of, or causes, harm; for example making, sending and receiving explicit images, e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying, and

- **commerce** - risks such as online gambling, inappropriate advertising, phishing and or financial scams. If you feel students or staff are at risk, please report it to the Anti-Phishing Working Group [APWG | Unifying The Global Response To Cybercrime](#).

- 35.2 Governing bodies and proprietors should ensure online safety is a running and interrelated theme whilst devising and implementing their whole college approach to safeguarding and related policies and procedures. This will include considering how online safety is reflected as required in all relevant policies and considering online safety whilst planning the curriculum, any teacher training, the role and responsibilities of the designated safeguarding lead (and deputies) and any parental engagement.
- 35.3 At Heart of Worcestershire College we have a clear policy on the use of mobile and smart technology. We understand the fact many young people have unlimited and unrestricted access to the internet via mobile phone networks (i.e. 3G, 4G and 5G). This access means some young people, whilst at college, sexually harass, bully, and control others via their mobile and smart technology, share indecent images consensually and non-consensually (often via large chat groups) and view and share pornography and other harmful content. We have carefully considered how this is managed on our premises and reflect this in our safeguarding and child protection policy.
- 35.4 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. These filters and monitoring systems are regularly reviewed for their effectiveness. The leadership team and relevant staff have an awareness and understanding of the provisions in place and manage them effectively and know how to escalate concerns when identified.
- 35.5 The college will make information available to learners and their parent /carers about internet safety. Tutorials will be delivered through the THRIVE programme to ensure learners understand how to keep themselves safe online. To monitor the impact of this a question will be asked annually through the Student Satisfaction Survey about a learners' ability to keep themselves safe online.
- 35.6 During local, partial or full lockdown young people could be at greater risk of online abuse. Under these circumstances staff are reminded to maintain the view that 'it could happen here' and to immediately report any concerns to the safeguarding team. Young people will be using the internet more during this period. The College will use online approaches to deliver training or support. Staff are aware of the signs and signals of cyberbullying and other risks online and apply the same child-centred safeguarding practices as when students are learning at the College.
- 35.7 During a lockdown, the majority of learners would not be using College equipment or accessing College resources via our networks, therefore our eSafe monitoring system which helps us to identify inappropriate student conversations and behaviours will not be available to us in the same way.
- 35.8 It is therefore extremely important that staff are mindful of this when interacting with students and setting work and tasks and that professional boundaries do not slip during this exceptional period and that protocols for online working are observed. Hints and tips for staff are available in Appendix 6

## **36 Procedure for dealing with disclosures**

36.1 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 they said in front of another person.
- Do not begin an investigation.

36.2 Report immediately to the DSL/Deputy DSL/Safeguarding Team 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.

## **37 Care Experienced**

37.1 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.

37.2 Local authorities have on-going responsibilities to the young people who cease to be looked after and become care leavers.<sup>1</sup> 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.

### **38 Children potentially at greater risk of harm**

#### **38.1 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.

38.2 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.

38.3 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).

38.4 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.

### **39 Contextualised Safeguarding**

39.1 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.

39.2 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.

### **40 Information Sharing and Confidentiality**

40.1 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 be 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.

#### 40.2 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.
- 40.2.1 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:***

- 40.2.2 there is evidence that a young person/vulnerable adult is suffering or is at risk of suffering significant harm;
- 40.2.3 where there is reasonable cause to believe that a young person/vulnerable adult may be suffering or is at risk of suffering significant harm;
- 40.2.4 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

#### 40.3 Informing the 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](mailto: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. ESSFA 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](mailto:Enquiries.EFA@education.gov.uk).

## 41 Record Keeping

- 41.1 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.
- 41.2 Where students leave Heart of Worcestershire College, the designated safeguarding lead will ensure their child protection file is transferred to the new school or college as soon as possible, and **within 5 days** for an in-year transfer or within the **first 5 days** of the start of a new term to allow the new school or college to have support in place for when the young person arrives. The designated safeguarding lead will ensure secure transit, and confirmation of receipt should be obtained. The receiving colleges should ensure key staff such as designated safeguarding leads and special educational needs co-ordinators (SENCO's) or the named persons with oversight for special educational needs and disability (SEND) in a college, are aware as required. Any files requested by agencies e.g. police, will be copied.
- 24.3 A record of any allegations (proven) made against staff is kept in a confidential file by the HR department.

## 42 Supporting Learners

- 42.1 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:
  - 42.1.1 The achievement of their qualification;
  - 42.1.2 The College ethos which promotes a positive, supportive and secure environment and gives individuals a sense of being valued;

- 42.1.3 Adherence to the Student Standards Policy, ensuring that unacceptable behaviour is challenged with due consideration paid to individual circumstances;
- 42.1.4 Liaison with partner agencies such as Children's Social Care, Child and Adult Mental Health Service (CAMHS) and other relevant agencies;
- 42.1.5 The use of early help interventions, through the Family Front Door, when appropriate.
- 42.1.6 Notifying Children's Social Care immediately if there is a significant concern.
- 42.1.7 Providing continuing support to individuals by ensuring that appropriate information is forwarded under confidential cover to any new provider.

## **43 Safeguarding Vulnerable Adults from Abuse**

### **43.1 All adults have a right to:**

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

### **43.2 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.

### **43.3 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:

- 43.3.1 Experience of domestic abuse
- 43.3.2 Experience of Child Sexual and or Criminal Exploitation
- 43.3.3 Experience of past or repeat bullying
- 43.3.4 A history of self-neglect or self-harm
- 43.3.5 Been a victim of abuse or crime
- 43.3.6 Experienced abuse due to their racial, cultural or religious background
- 43.3.7 A poor socio-economic background
- 43.3.8 Refugee or asylum status
- 43.3.9 Are or have been in the care system
- 43.3.10 Young Carers

### **43.4 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.

- 43.5 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.

## **44 Mental Health**

- 44.1 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.
- 44.2 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.
- 44.3 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.
- 44.4 For further details refer to the Sustainable mental fitness approach at HoW College document and the Fitness to study policy.

## **45 Safer Recruitment and Selection of Staff and Volunteers**

- 45.1 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.
- 45.2 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.

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

## **46 Allegations against staff**

- 46.1 It is recognised that an allegation may be made against a member of staff, supply teacher, agency staff, volunteer or contractor. If such an allegation is made, the member of staff receiving the allegation will immediately inform the DSL and/or

HR/Deputy Principal, unless the allegations concern the Principal, in which case the Chair of Governors will be informed immediately.

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.

## **47 Low Level Concerns**

The term 'low-level' concern does not mean that it is insignificant. A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' - that an adult working in or on behalf of the school or college may have acted in a way that:

- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work, and does not meet the harm threshold or is otherwise not serious enough to consider a referral to the LADO.

Examples of such behaviour could include, but are not limited to:

- being over friendly with children and young people
- having favourites
- taking photographs of children and young people on their mobile phone, contrary to school policy
- engaging with a child or young person on a one-to-one basis in a secluded area or behind a closed door, or
- humiliating children or young people

Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, behaviour to actions which may look to be inappropriate, but might not be in specific circumstances, through to that which is ultimately intended to enable and enact abuse.

## **49 Whistleblowing**

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.

## **49 Abuse of Position of Trust**

- 49.1 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.

## **50 Positive Physical Intervention**

- 50.1 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.

## **51 Health and Safety**

- 51.1 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.
- 51.2 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.

## **52 Photography and Use of Images**

- 52.1 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).

## **53 Safe Environment**

- 53.1 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.
- 53.2 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.

## **54 Filtering and Monitoring**

- 54.1 Our Governing Body will ensure an appropriate senior member of staff, from our college leadership team, is appointed to the role of Designated Safeguarding Lead. It is not appropriate for the proprietor to be the Designated Safeguarding Lead. The Designated Safeguarding Lead should take lead responsibility for safeguarding and child protection (including online safety and understanding the filtering and monitoring systems and processes in place). This is explicit in the role holder's job description.
- 54.2 Our Governing Body ensures the Designated Safeguarding Lead has the appropriate status and authority within the college to carry out the duties of the post. The role carries a significant level of responsibility and the postholder should be given the additional time, funding, training, resources, and support needed to carry out the role effectively. We ensure

that all staff undergo safeguarding and child protection training (including online safety which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring at induction. The training should be regularly updated. Induction and training should be in line with any advice from the safeguarding partners

- 54.3 The appropriateness of any filtering and monitoring systems are a matter for individual college and will be informed in part, by the risk assessment required by the Prevent Duty.

To support schools and colleges to meet this duty, the Department for Education has published [filtering and monitoring standards](#) which set out that schools and colleges should:

- Identify and assign roles and responsibilities to manage filtering and monitoring systems.
- Review filtering and monitoring provision at least annually.
- Block harmful and inappropriate content without unreasonably impacting teaching and learning.
- Have effective monitoring strategies in place that meet their safeguarding needs

- 54.4 We review the standards and discuss with IT staff and service providers what more needs to be done to support schools and colleges in meeting this standard.  
[The Prevent duty Departmental advice for schools and childcare providers](#) and Home Office Additional guidance on filtering and monitoring can be found at: UK Safer Internet Centre: “appropriate” filtering and monitoring.

[Appropriate Filtering and Monitoring - UK Safer Internet Centre](#)

South West Grid for Learning ([swgfl.org.uk](http://swgfl.org.uk)) have created a [tool](#) to check whether a school or college’s filtering provider is signed up to relevant lists (CSA content, Sexual Content, Terrorist content, Your Internet Connection Blocks Child Abuse & Terrorist Content).

- 54.5 All our staff are aware of their duty to raise concerns, where they exist, about the attitude or actions of colleagues using the college's confidential reporting (whistleblowing) policy. Whistleblowing concerns about the Principal should be raised with the Chair of Governors. Where the Principal is also the sole proprietor, concerns should be reported directly to the Local Authority Designated Officer (LADO).

Statutory guidance contains further information on: [The Role and Responsibilities of the Designated Teacher](#) .

## **55 Racist Incidents**

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.

## **56 Anti Bullying**

- 56.1 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

- 56.2 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.

## **57 Challenge and Escalation**

- 57.1 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.
- 57.2 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.
- 57.3 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.

## **58 Monitoring and Evaluation**

- 58.1 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 Section 175 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.

## **59 Use Of College Premises For Non-College Activities**

- 59.1 The College recognises the importance of appropriate arrangements need to be in place for organisations or individuals that hire out our facilities. Refer to the Room Hire policy for guidance.

## **42 Safeguarding Contacts: External**

Children's Services Family Front Door (FFD)	Tel: 01905 822666 (core working hours) Email: <a href="mailto:childrensteam@worcestershire.gov.uk">childrensteam@worcestershire.gov.uk</a>
Emergency Duty Team (EDT) out of office hours	Tel: 01905 768020 Website: <a href="http://worcestershire.gov.uk/">http://worcestershire.gov.uk/</a>
To submit an online Cause for Concern notification log onto:	<a href="#"><u>Refer to Children's Social Care   Worcestershire County Council</u></a>  <a href="#"><u>Report a safeguarding concern about an adult   Worcestershire County Council</u></a>
Local Authority Designated Officer:	Tel: 01905 846221 Email: <a href="mailto:lado@worcestershire.gcsx">lado@worcestershire.gcsx</a> Website: <a href="#"><u>LADO Concern</u></a>
Education Adviser – Safeguarding: Denise Hannibal	Tel: 01905 844436 Email: <a href="mailto:dhannibal@worcestershire.gov.uk">dhannibal@worcestershire.gov.uk</a> <a href="mailto:JBayliss@worcestershire.gov.uk">JBayliss@worcestershire.gov.uk</a>
Channel Chair - James Bayliss Public Health Practitioner	
Police – Prevent team:	Tel: 01386 591835 Website: <a href="#"><u>Prevent   West Mercia Police</u></a>
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: <a href="mailto:helpline@womensaid.org.uk">helpline@womensaid.org.uk</a>
West Mercia Rape and Sexual Abuse Support Centre (WMRSASC)	Tel: 01905 611655
West Mercia Police	
24hrs non-emergency	Tel: 101/0300 333 3000
Emergency	Tel: 999 Website: <a href="http://www.westmerciapolice.uk">www.westmerciapolice.uk</a> Tel: 0808 800 5000
NSPCC Helpline	Website: <a href="http://help@nspcc.org.uk">help@nspcc.org.uk</a>
Forced Marriage Unit	Tel: 020 70089 0151 Email: <a href="mailto:fmu@fcdo.gov.uk">fmu@fcdo.gov.uk</a>



## Appendix 1

### Additional support and advice

Abuse or Safeguarding issue	Link to Guidance/Advice	Source
General advice for 16-25	<a href="#">Get There</a>	Get There Worcestershire County Council
Abuse	<a href="#">What to do if you're worried a child is being abused</a>	DfE advice
	<a href="#">Domestic abuse: Various Information/Guidance</a>	Home Office
	<a href="#">Faith based abuse: National Action Plan</a>	DfE advice
	<a href="#">Relationship abuse: disrespect nobody</a>	Home Office website
	<a href="#">Working together until women and children are safe</a>	Women's Aid
	<a href="#">Support for survivors of any form of sexual attack</a>	WMRASASC
	<a href="#">Sexual Assault Referral Centre</a>	The Glade
	<a href="#">Rape and sexual violence support across Birmingham and Solihull</a>	RSVP
	<a href="#">Support for people affected by crime</a>	Victim Support
Benefit Advice	<a href="#">Benefit advice</a>	Department for Work and Pensions
	<a href="#">Advice on benefits</a>	Citizens Advice Bureau
Bullying	<a href="#">Preventing bullying including cyberbullying</a>	DfE advice
Children missing from education, home or care	<a href="#">Children missing education</a>	DfE statutory guidance
	<a href="#">Child missing from home or care</a>	DfE statutory guidance
	<a href="#">Children and adults missing strategy</a>	Home Office strategy
Children with family members in prison	<a href="#">National Information Centre on Children of Offenders</a>	Barnardo's in
		partnership with Her Majesty's Prison and Probation Service
Child Exploitation	<a href="#">County Lines: criminal exploitation of children and vulnerable adults</a>	Home Office guidance

	<a href="#"><u>Child sexual exploitation: guide for practitioners</u></a>	DfE
	<a href="#"><u>Trafficking: safeguarding children</u></a>	DfE and HO guidance
	<a href="#"><u>Child Sexual Exploitation</u></a>	Worcestershire County Council
	<a href="#"><u>Child Criminal Exploitation</u></a>	Worcestershire County Council
	<a href="#"><u>Parents against child sexual exploitation</u></a>	PACE
Drugs and alcohol	<a href="#"><u>Drugs: advice for schools</u></a>	DfE and ACPO advice
	<a href="#"><u>Drug strategy 2017</u></a>	Home Office strategy
	<a href="#"><u>Information and advice on drugs</u></a>	Talk to Frank website
	<a href="#"><u>Alcohol and drug recovery service</u></a>	Cranstoun
General support	<a href="https://www.westmercia.police.uk"><u>https://www.westmercia.police.uk</u></a>	West Mercia Police
	<a href="http://www.youngsolutions.org.uk/"><u>http://www.youngsolutions.org.uk/</u></a>	Young Solutions
	<a href="https://www.actionforchildren.org.uk/"><u>https://www.actionforchildren.org.uk/</u></a>	Action for children
“Honour Based Violence”  (so called)	<a href="#"><u>Female genital mutilation: information and resources</u></a>	Home Office
	<a href="#"><u>Female genital mutilation: multi agency statutory guidance</u></a>	DfE, DH, and HO statutory guidance
	<a href="#"><u>Forced marriage: information and practice guidelines</u></a>	Foreign Commonwealth
	<a href="#"><u>Supporting victims of honour-based abuse and forced marriage</u></a>	Karma Nirvana website
Health and Wellbeing	<a href="#"><u>Rise Above: Free PSHE resources on health, wellbeing and resilience</u></a>	Public Health England resources
	<a href="#"><u>Medical-conditions: supporting pupils at school</u></a>	DfE statutory Guidance
	<a href="#"><u>Mental health and behaviour</u></a>	DfE advice
Homelessness	<a href="#"><u>Homelessness: How local authorities should exercise their functions</u></a>	HCLG
	<a href="#"><u>Worcester City Council - Homeless support</u></a>	Worcester City Council
	<a href="#"><u>Redditch Borough Council - Homeless support</u></a>	Redditch Borough Council
	<a href="#"><u>Bromsgrove District Housing Trust</u></a>	Bromsgrove District Housing Trust
	<a href="#"><u>Emergency accommodation for 16-25 year olds</u></a>	Nightstop
	<a href="#"><u>Supported housing for young people</u></a>	YMCA
	<a href="#"><u>Homelessness support for 16-25 year olds across West Midlands</u></a>	St Basil's
	<a href="#"><u>Homelessness prevention - South Birmingham</u></a>	South Birmingham Homeless Project
	<a href="#"><u>Drop in centre and floating support</u></a>	The Basement Project
	<a href="#"><u>Homelessness support for 16-25 year olds across West Midlands</u></a>	St Basil's
	<a href="#"><u>Drop in centre and floating support</u></a>	The Basement Project

LGBT	<a href="#">Support for gender variant and transgender children, young people and their families</a>	Mermaids
	<a href="#">Advocate for and supporting lesbian, gay, bisexual and trans communities in Birmingham</a>	The Birmingham LGBT Society
	<a href="#">Increasing understanding of gender diversity</a>	Gendered Intelligence
	<a href="#">Who we are   Stonewall</a>	Stonewall
Mental Health	<a href="#">Child and adolescent mental health services</a>	CAMHS
	<a href="#">Welcome to NHS Talking Therapies   Talking Therapies</a>	Worcestershire Talking Therapies
	<a href="#">Childline   Free counselling service for kids and young people   Childline</a>	Childline
	<a href="#">Essential Support for under 25s</a>	The Mix
	<a href="#">Online support for young people</a>	Kooth
	<a href="#">Children's mental health charity</a>	Place 2 be
	<a href="#">Relationship support</a>	Relate
	<a href="#">Support for bereaved families in Worcestershire</a>	Footsteps
	<a href="#">Supporting bereaved young people in NE Worcestershire</a>	Touchstones
	<a href="#">The big listen</a>	Samaritans
	<a href="#">Mental Health Charity</a>	Mind
	<a href="#">YoungMinds   Mental Health Charity For Children And Young People   YoungMinds</a>	Young Minds
Online Safety	<a href="#">Sexting: responding to incidents and safeguarding children</a>	UK Council for Child Internet
	<a href="#">Internet safety support and advice</a>	CEOP
	<a href="#">CEOP Education</a>	Thinkuknow
Private fostering	<a href="#">Private fostering: local authorities</a>	DfE - statutory guidance
Radicalisation	<a href="#">Prevent duty guidance</a>	Home Office guidance
	<a href="#">Prevent duty advice for schools</a>	DfE advice
	<a href="#">Educate Against Hate Website</a>	DfE and Home Office
Sexual Health	<a href="#">Sexual Health Services</a>	Know your stuff NHS
Violence	<a href="#">Gangs and youth violence: for schools and colleges</a>	Home Office advice
	<a href="#">Ending violence against women and girls 2016-2020 strategy</a>	Home Office strategy
	<a href="#">Violence against women and girls: national statement of expectations for victims</a>	Home Office guidance
	<a href="#">Sexual violence and sexual harassment between</a>	DfE advice
	<a href="#">children in schools and colleges Serious violence strategy</a>	Home Office Strategy
Young carers	<a href="#">Support for young carers</a>	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 (KCSIE 24 Best practice is checking the name on their birth certificate)
- 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).
- In addition, as part of our shortlisting process we will consider carrying out an online search as part of their due diligence on the shortlisted candidates. This may help identify any incidents or issues that have happened, and are publicly available online, which the school or college might want to explore with the applicant at interview. We will inform shortlisted candidates that online searches may be done as part of due diligence checks. See Part two - Legislation and the Law for information on data protection and UK GDPR.
- 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.

### **Individuals who have lived or worked outside the UK**

Individuals who have lived or worked outside the UK **must** undergo the same checks as all other staff in schools or colleges (set out in paragraphs 213). This includes obtaining (via the applicant) an enhanced DBS certificate (including barred list information, for those who will be engaging in regulated activity) even if the individual has never been to the UK. In addition, schools and colleges **must** make any further checks they think appropriate so that any relevant events that occurred outside the UK can be considered. Following the UK's exit from the EU, schools and colleges should apply the same approach for any individuals who have lived or worked outside the UK regardless of whether or not it was in an EEA country or the rest of the world

### **Governance**

The Corporation 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.

### **Harm Test**

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 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

If the individual has been removed from working in regulated activity (paid or unpaid) or would have been removed if they had not i.e. 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)

## 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 college receives Operation Encompass notifications via email from Worcestershire Children First.

### **The DSL's responsibility – the DSL should:**

The link to the children's portal is:

[https://capublic.worcestershire.gov.uk/Chs\\_Portal/HomePage.aspx](https://capublic.worcestershire.gov.uk/Chs_Portal/HomePage.aspx)

- View the Operation Encompass website ([www.operationencompass.org](http://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

## Appendix 7

### Peer on Peer Abuse Guidance

#### 1. Context and Definition

It is essential that **all our staff** understand the importance of challenging inappropriate behaviours between peers, many of which are listed below, that are actually abusive in nature. Downplaying certain behaviours, for example dismissing sexual harassment as “just banter”, “just having a laugh”, “part of growing up” or “boys being boys” can lead to a culture of unacceptable behaviours, an unsafe environment for children and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it. (KCSIE 21)

Addressing inappropriate behaviour (even if it appears to be relatively innocuous) **can** be an important intervention that helps prevent problematic, abusive and/or violent behaviour in the future.

Heart of Worcestershire College maintains an attitude of ‘**it could happen here**’ where safeguarding is concerned. When concerned about the welfare of a child, staff should always act in the **best** interests of the child.

Peer abuse is behaviour by an individual or group, intending to physically, sexually or emotionally hurt others.

All staff should recognise that children are capable of abusing their peers. All staff should be aware of safeguarding issues from peer abuse including:

bullying (including online bullying)

physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise

causing physical harm sexual violence and sexual harassment

sexting (also known as youth produced sexual imagery); and

initiation/hazing type violence and rituals

This abuse can:

Be motivated by perceived differences e.g., on grounds of race, religion, gender, sexual orientation, disability or other differences.

Result in significant, long lasting and traumatic isolation, intimidation or violence to the victim; vulnerable adults are at particular risk of harm

Children or young people who harm others may have additional or complex needs e.g.

- Significant disruption in their own lives
- Exposure to domestic abuse or witnessing or suffering abuse
- Educational under-achievement
- Involved in crime



Stopping violence and ensuring immediate physical safety is the first priority of any education setting, but emotional bullying can sometimes be more damaging than physical. College staff, alongside their Designated Safeguarding Lead and/or Deputy, have to make their own judgements about each specific case and should use this policy guidance to help.

## **2. Responsibility**

Keeping Children Safe in Education (KCSIE), 2025 states that

*‘Governing bodies and proprietors should ensure their child protection policy includes procedures to minimise the risk of peer-on-peer abuse and sets out how allegations of peer-on-peer abuse will be investigated and dealt with’.*

It also emphasises that the voice of the child must be heard

*‘Governing bodies, proprietors and school or college leaders should ensure the child’s wishes and feelings are taken into account when determining what action to take and what services to provide. Systems should be in place for children to express their views and give feedback. Ultimately, all system and processes should operate with the best interests of the child at their heart.’*

Peer on Peer abuse is referenced in the Safeguarding and Child Protection Policy. The sensitive nature and specific issues involved with peer on peer necessitate separate guidance.

At Heart of Worcestershire College, we continue to ensure that any form of abuse or harmful behaviour is dealt with immediately and consistently to reduce the extent of harm to the young person, with full consideration to the impact on that individual child’s emotional and mental health and well-being.

## **3. Purpose of Policy**

The purpose of this policy is to explore some forms of peer-on-peer abuse. The policy also includes a planned and supportive response to the issues.

At Heart of Worcestershire College, we have the following policies in place that should be read in conjunction with this policy:

- 3.1** Student Standards
- 3.2** Safeguarding and Child Protection Policy
- 3.3** Managing Allegations / Whistleblowing Policy
- 3.4** Health & Safety Policy

## **4. Framework and Legislation**

This policy is supported by the key principles of the Children’s Act, 1989 that the child’s welfare is paramount. Another key document is Working Together, 2018, highlighting that every assessment of a child, ‘must be informed by the views of the child’. (Working Together, 2018:21) This is echoed by Keeping Children Safe in Education, 2025 through ensuring procedures are in place in schools and settings to hear the voice of the child.

## 5. Abuse and harmful behaviour

It is necessary to consider

- what abuse is and what it looks like
- how it can be managed
- what appropriate support and intervention can be put in place to meet the needs of the individual
- what preventative strategies may be put in place to reduce further risk of harm.

Abuse is abuse and should never be tolerated or passed off as 'banter' or 'part of growing up'. It is important to consider the forms abuse may take and the subsequent actions required.

- Children are vulnerable to abuse by their peers. Such abuse should be taken as seriously as abuse by adults and should be subject to the same child protection procedures.
- Children can abuse other children. This can include (but is not limited to): abuse within intimate partner relationships; bullying (including cyberbullying); sexual violence and sexual harassment; physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm; sexting and initiation/hazing type violence and rituals.

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- Staff should not dismiss abusive behaviour as normal between young people and should not develop high thresholds before taking action.
- Staff should be aware of the potential uses of information technology for bullying and abusive behaviour between young people.
- Staff should be aware of the added vulnerability of children and young people who have been the victims of violent crime (for example mugging), including the risk that they may respond to this by abusing younger or weaker children.

The alleged perpetrator is likely to have considerable unmet needs as well as posing a significant risk of harm to other children. Evidence suggests that such children may have suffered considerable disruption in their lives, may have witnessed or been subjected to physical or sexual abuse, may have problems in their educational development and may have committed other offences. They may therefore be suffering, or be at risk of suffering, significant harm and be in need of protection. Any long-term plan to reduce the risk posed by the alleged perpetrator must address their needs.

## 6. Types of abuse

There are many forms of abuse that may occur between peers and this list is not exhaustive. Each form of abuse or prejudiced behaviour is described in detail followed by advice and support on actions to be taken.

### 6.1 Physical Abuse

This may include hitting, kicking, nipping/pinching, shaking, biting, hair pulling, or otherwise causing physical harm to another person. There may be many reasons why a child harms another and it is important to understand why a young person has engaged in such behaviour, including accidentally before considering the action to be undertaken.

### 6.2 Sexual violence and sexual harassment

The starting point regarding any report should always be that there is a zero-tolerance approach to sexual violence and sexual harassment, and it is never acceptable, and it will not be tolerated

This must always be referred immediately to the Designated Safeguarding Lead or Deputy.

Sexual violence and sexual harassment can occur between two children of any age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.

Whilst **any** report of sexual violence or sexual harassment should be taken seriously, staff should be aware it is more likely that girls will be the victims of sexual violence and sexual harassment and more likely it will be perpetrated by boys. But it is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

Abuse that occurs online or outside of the school or college should not be downplayed and should be treated equally seriously

Sexually harmful behaviour from young people is not always contrived or with the intent to harm others. There may be many reasons why a young person engages in sexually harmful behaviour and it may be just as distressing to the young person who instigates it as to the young person it is intended towards. Sexually harmful behaviour may include:

- inappropriate sexual language
- inappropriate role play
- sexual touching
- sexual assault/abuse.

Staff should be aware of the importance of:

- making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up
- not tolerating or dismissing sexual violence or sexual harassment as “banter”, “part of growing up”, “just having a laugh” or “boys being boys”; and

- challenging behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them
- **Upskirting:** where someone takes a picture under a person's clothing (not necessarily a skirt) without permission and or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is a criminal offence. Anyone of any gender, can be a victim.

It is important that the victim understands what the next steps will be and who the report will be passed to; recognising that a child is likely to disclose to someone they trust: this could be **anyone** on the school or college staff. It is important that the person to whom the child discloses recognises that the child has placed them in a position of trust. They should be supportive and respectful of the child; recognising that an initial disclosure to a trusted adult may only be the first incident reported, rather than representative of a singular incident and that trauma can impact memory and so children may not be able to recall all details or timeline of abuse;

The DSL will follow the DfE Guidance: Sexual violence and sexual harassment between children in schools and colleges Sept 2021 with consideration of

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/99923/9/SVSH\\_2021.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/99923/9/SVSH_2021.pdf)

- Managing internally 65.1, page 27
- Early Help 65.2, page 28
- MASH referral 65.3. page 28
- Reporting to the police 65.4, Page 29

When there has been a report of sexual violence, the designated safeguarding lead (or a deputy) will make an immediate risk and needs assessment. Where there has been a report of sexual harassment, the need for a risk assessment will be considered on a case-by-case basis

Effective safeguarding practice includes:

- if possible, managing reports with two members of staff present, (preferably one of them being the designated safeguarding lead or a deputy). However, this might not always be possible.
- where the report includes an online element, being aware of searching screening and confiscation advice (for schools) and UKCIS Sharing nudes and semi-nudes: advice for education settings working with children and young people.

A key consideration is for staff not to view or forward illegal images of a child. In some cases, it may be more appropriate to confiscate any devices to preserve any evidence and hand them to the police for inspection

### **6.3 Bullying**

Bullying is unwanted, aggressive behaviour among college aged children that involves a real or perceived power imbalance. The behaviour is repeated, or has the potential to be repeated, over time. Both young people who are bullied and who bully others may have serious, lasting problems.

In order to be considered bullying, the behaviour must be aggressive and include:

- An Imbalance of Power: Young people who bully use their power—such as physical strength, access to embarrassing information, or popularity—to control or harm others. Power imbalances can change over time and in different situations, even if they involve the same people.
- Repetition: Bullying behaviours happen more than once or have the potential to happen more than once.

Bullying includes actions such as making threats, spreading rumours, attacking someone physically or verbally or for a particular reason e.g. size, hair colour, gender, sexual orientation, and excluding someone from a group on purpose.

### **6.4 Online Bullying**

Online Bullying is the use of technology (social networking, messaging, text messages, e-mail, chat rooms etc.) to harass threaten or intimidate someone for the same reasons as stated above.

Online bullying can take many forms:

- Abusive or threatening texts, emails or messages
- Posting abusive comments on social media sites
- Sharing humiliating videos or photos of someone else
- Stealing someone's online identity
- Spreading rumours online
- Trolling – sending someone menacing or upsetting messages through social networks, chatrooms or games
- Developing hate sites about another person
- Prank calls or messages
- Group bullying or exclusion online
- Anonymous messaging
- Encouraging a young person to self-harm
- Pressuring children to send sexual messages or engaging in sexual conversations

### **6.5 Sexting / Sharing nude or indecent imagery**

The term 'sexting' relates to the sending of indecent images, videos and/or written messages with sexually explicit content; these are created and sent electronically. They are often 'shared' via social networking sites and instant messaging services.

Upskirting: 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.

This must always be referred immediately to the Designated Safeguarding Lead or Deputy. DSL will follow the UKCIS: Sexting in schools and colleges 2016 guidance.

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/551575/6.243\\_9\\_KG\\_NCA\\_Sexting\\_in\\_Schools\\_WEB\\_1\\_.PDF](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/551575/6.243_9_KG_NCA_Sexting_in_Schools_WEB_1_.PDF)

## **6.6 Initiation/Hazing**

Hazing is a form of initiation ceremony which is used to induct newcomers into an organisation such as a private school, sports team etc. There are a number of different forms, from relatively mild rituals to severe and sometimes violent ceremonies. The ceremony welcomes newcomers by subjecting them to a series of trials which promote a bond between them. After the hazing is over, the newcomers also have something in common with older members of the organisation, because they all experienced it as part of a rite of passage. Many rituals involve humiliation, embarrassment, abuse, and harassment.

## **6.7 Prejudiced Behaviour**

The term prejudice-related bullying refers to a range of hurtful behaviour, physical or emotional or both, which causes someone to feel powerless, worthless, excluded or marginalised, and which is connected with prejudices around belonging, identity and equality in wider society – for example disabilities and special educational needs, ethnic, cultural and religious backgrounds, gender, home life, (for example in relation to issues of care, parental occupation, poverty and social class) and sexual identity.

## **6.8 Teenage relationship abuse**

Teenage relationship abuse is a pattern of actual or threatened acts of physical, sexual, and/or emotional abuse, perpetrated by an adolescent (between the ages of 13 and 18) against a current or former partner. Abuse may include insults, coercion, social sabotage, sexual harassment, threats and/or acts of physical or sexual abuse. The abusive teen uses this pattern of violent and coercive behaviour, in a heterosexual or same gender relationship, in order to gain power and maintain control over the partner. This abuse may be child sexual exploitation.

## **7. Expected staff action**

Staff should report any incidences through to the Safeguarding team (DSL/Deputy DSL) following the College's safeguarding procedures.

Students are able to anonymously report incidences via the Whisper

report. Whisper Reporting

## **8. Recognising peer abuse**

An assessment of an incident between peers should be completed and consider:

- a. Chronological and developmental ages of everyone involved
- b. Difference in their power or authority in relation to age, race, gender, physical, emotional or intellectual vulnerability
- c. All alleged physical and verbal aspects of the behaviour and incident
- d. Whether the behaviour involved inappropriate sexual knowledge or motivation
- e. What was the degree of physical aggression, intimidation, threatening behaviour or bribery
- f. The effect on the victim
- g. Any attempts to ensure the behaviour and incident is kept a secret
- h. The child or young person's motivation or reason for the behaviour, if they admit that it occurred
- i. Whether this was a one-off incident, or longer in duration

It is important to deal with a situation of peer abuse immediately and sensitively. It is necessary to gather the information as soon as possible to get the true facts. It is equally important to deal with it sensitively and think about the language used and the impact of that language on both the children and the parents when they become involved. Avoid language that may create a 'blame' culture and leave a child labelled.

Staff will talk to young people in a calm and consistent manner. Staff will not be prejudiced, judgmental, dismissive or irresponsible in dealing with such sensitive matters.

### **8.1 Taking Action**

- Always take complaints seriously
- Gain a statement of facts from the student(s)
- Assess needs of victim and alleged perpetrator
- Consider referral to Police or Social Care
- Contribute to multi-agency assessments
- Convene a risk management meeting
- Record all incidents and all action taken

## 8.2 Recording sexualised behaviour

- Be clear, explicit and non-avoidant, and avoid vague statements or euphemisms
- Record as soon as possible, as you can quickly forget or confuse detail
- Follow the prompts on your safeguarding and child protection recording form
- Use proper names for body parts but record exactly any language or vocabulary used by the child. Use the child's exact words in quotation marks.
- Note where and when the incident happened and whether anyone else was around.

## 8.3 Gather the Facts

Speak to all the young people involved separately, gain a statement of facts from them and use **consistent language** and **open questions** for each account. Ask the young people to tell you what happened. Use open questions, 'where, when, why, who'. (What happened? Who observed the incident? What was seen? What was heard? Did anyone intervene?). Do not interrogate or ask leading questions.

## 8.4 Consider the Intent

Has this been a deliberate or contrived situation for a young person to be able to harm? another?

## 8.5 Decide on your next course of action

If you believe any young person to be at risk of significant harm, you must report to the Designated Safeguarding Lead or Deputy immediately; they will follow the College's Safeguarding and Child Protection Policy.

If MASH and the police intend to pursue this further, they may ask to interview the young people in college, or they may ask for parents to come to college to be spoken to. It is important to be prepared for every situation and the potential time it may take.

## 8.6 Informing parents/carers

The best way to inform parents/carers is face to face. Although this may be time consuming, the nature of the incident and the type of harm/abuse a young person may be suffering can cause fear and anxiety to parents/carers whether their child is the child who was harmed or who harmed another.

Is the student 13+ and does not want to share with parents? Use the 'Gillick' test and the 'Fraser' guidelines.

<https://www.nspcc.org.uk/preventing-abuse/child-protection-system/legal-definition-child-rights-law/gillick-competency-fraser-guidelines/>

In all circumstances where the risk of harm to the child is evident then the college should encourage the young person to share the information with their parent/carer (they may be scared to tell parents/carers that they are being harmed in any way).



## **9. Points to consider**

### **9.1 What is the age of the children involved?**

How old are the young people involved in the incident and is there any age difference between those involved?

### **9.2 Where did the incident or incidents take place?**

Was the incident in an open, visible place to others? If so, was it observed? If not, is more supervision required within this particular area?

### **9.3 What was the explanation by all children involved of what occurred?**

Can each of the young people give the same explanation of the incident and also what is the effect on the young people involved? Is the incident seen to be bullying for example, in which case regular and repetitive? Is the version of one young person different from another and why?

### **9.4 What is each of the children's own understanding of what occurred?**

Do the young people know/understand what they are doing? E.g. do they have knowledge of body parts, of privacy and that it is inappropriate to touch? Is the young person's explanation in relation to something they may have heard or been learning about that has prompted the behaviour? Is the behaviour deliberate and contrived? Does the young person have an understanding of the impact of their behaviour on the other person?

### **9.5 Repetition**

Has the behaviour been repeated to an individual on more than one occasion? In the same way it must be considered has the behaviour persisted to an individual after the issue has already been discussed or dealt with and appropriately resolved?

## **10 Next Steps**

Once the outcome of the incident(s) has been established it is necessary to ensure future incidents of abuse do not occur again and consider the support and intervention required for those involved.

### **10.1 For the young person who has been harmed**

The level of support required depends on the individual young person. It may be that they wish to seek counselling or one to one support via a mentor. It may also be that they feel able to deal with the incident(s) on their own or with support of family and friends; in which case it is necessary that this young person continues to be monitored and offered support should they require it in the future. If the incidents are of a bullying nature, the young person may need support in improving peer groups/relationships with other young people, or some restorative justice work with all those involved may be required.

Other interventions that could be considered may target a whole class or year group for example a speaker on online bullying, relationship abuse etc. It may be delivered through your college's THRIVE tutorial programme.

For the young person who has displayed harmful behaviour it is important to find out why the young person has behaved in such a way. It may be that the young person is experiencing their own difficulties and may even have been harmed themselves in a similar way. In such cases support such as one to one mentoring or counselling may also be necessary.

Particular support from identified services may be necessary through an early help referral and the young person may require additional support from family members.

Once the support required to meet the individual needs of the young person has been met, it is important that the young person receives a consequence for their behaviour. This may be in the form of restorative justice e.g. making amends with the young person they have targeted if this has been some form of bullying. In the cases of sexually harmful behaviour it may be a requirement for the young person to engage in one to one work with a particular service or agency (if a crime has been committed this may be through the police or youth offending service). If there is any form of criminal investigation ongoing it may be that this young person cannot be educated on site until the investigation has concluded. In which case, the young person will need to be provided with appropriate support and education elsewhere.

It may be that the behaviour that the young person has displayed may continue to pose a risk to others, in which case an individual risk assessment may be required. This should be completed via a multi- agency response to ensure that the needs of the young person and the risks towards others are measured by all of those agencies involved including the young person and their parents. This may mean additional supervision of the young person or protective strategies if the young person feels at risk of engaging in further inappropriate or harmful behaviour. The college may also choose to take disciplinary action as a consequence such as suspension or exclusion for a period of time to allow the young person to reflect on their behaviour.

## **10.2 After care**

It is important that following the incident the young people involved continue to feel supported and receive help even if they have stated that they are managing the incident. Sometimes the feelings of remorse, regret or unhappiness may occur at a much later stage than the incident. It is important to ensure that the young people do not engage in any further harmful behaviour either towards someone else or to themselves as a way of coping (e.g. self-harm). For this reason, regular reviews with the young people following the incident(s) are imperative.

## **10 Preventative Strategies**

Peer on peer abuse can and will occur on any site even with the most robust policies and support processes. It is important to develop appropriate strategies to proactively prevent peer on peer abuse.

This college has an open environment where young people feel safe to share information about anything that is upsetting or worrying them. There is a strong and positive tutorial (THRIVE) curriculum that tackles such issues as prejudiced behaviour and gives young people

an open forum to talk things through rather than seek one on one opportunities to be harmful to one another. The college makes sure that 'support and report' signposting is available to young people.

Staff will not dismiss issues as 'banter' or 'growing up' or compare them to their own experiences of childhood. Staff will consider each issue and each individual in their own right before taking action.

Young people are part of changing their circumstances and, through college learner voice for example, we encourage young people to support changes and develop 'rules of acceptable behaviour'. We involve students in the positive ethos in college; one where all young people understand the boundaries of behaviour before it becomes abusive.

<https://www.nspcc.org.uk/globalassets/documents/publications/harmful-sexual-behaviour-framework.pdf>

## **11 Where to go for further information**

DfE: Statutory guidance: Working together to safeguard children, 2018  
<https://www.gov.uk/government/publications/working-together-to-safeguard-children--2>

DfE: Statutory guidance: Keeping children safe in education, September 2022  
<https://www.gov.uk/government/publications/keeping-children-safe-in-education--2>

DfE Guidance: Sexual violence and sexual harassment between children in schools and colleges, May 2018  
<https://www.gov.uk/government/publications/sexual-violence-and-sexual-harassment-between-children-in-schools-and-colleges>

DfE: Searching, screening and confiscation at school, January 2018  
<https://www.gov.uk/government/publications/searching-screening-and-confiscation>

DfE: Preventing and Tackling Bullying, July 2017  
<https://www.gov.uk/government/publications/preventing-and-tackling-bullying>

DfE: Statutory guidance School exclusion, May 2020  
<https://www.gov.uk/government/publications/school-exclusion>

DfE: Teaching Online Safety in Schools, June 2019  
<https://www.gov.uk/government/publications/teaching-online-safety-in-schools>

DfE: Relationship Education and Relationship and Sex Education, July 2020  
<https://www.gov.uk/government/publications/relationships-education-relationships-and-sex-education-rse-and-health-education>

DfE: Behaviour and discipline in schools, July 2020  
<https://www.gov.uk/government/publications/behaviour-and-discipline-in-schools>

DfE: Mental health and behaviour in schools, November 2018  
<https://www.gov.uk/government/publications/mental-health-and-behaviour-in-schools--2>

DfE: Children Missing Education, September 2016  
<https://www.gov.uk/government/publications/children-missing-education>

DfE: Cyberbullying: Advice for headteachers and school staff, November 2014  
[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/374850/Cyberbullying Advice for Headteachers and School Staff 121114.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/374850/Cyberbullying_Advice_for_Headteachers_and_School_Staff_121114.pdf)

DfE: Mental health and behaviour in schools, November 2018  
<https://www.gov.uk/government/publications/mental-health-and-behaviour-in-schools--2>

UKCIS: Sharing nudes and semi-nudes: advice for education settings working with children and young people [Sharing nudes and semi-nudes: advice for education settings working with children and young people](#) - GOV.UK ([www.gov.uk](http://www.gov.uk))

UKCIS: Tackling race and faith targeted bullying face to face and online. May 2017  
<https://www.gov.uk/government/publications/tackling-race-and-faith-targeted-bullying-face-to-face-and-online-a-guide-for-schools>

UKCIS: Education for a connected world, June 2020  
<https://www.gov.uk/government/publications/education-for-a-connected-world>

London Child Protection Procedures, edition 5, 2018 <http://www.londoncp.co.uk/>

Brook Traffic Light Tool

<https://www.brook.org.uk/training/wider-professional-training/sexual-behaviours-traffic-light-tool/>

Gov.uk: Equality Act 2010: advice for schools  
<https://www.gov.uk/government/publications/equality-act-2010-advice-for-schools>

Key messages from research on children and young people who display harmful sexual behaviour (PDF) [Home - CSA Centre](#)