

Chadsgrove Educational Trust Specialist College



Safeguarding Policy and Guidance September 2021

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IMPORTANT CONTACTS

ROLE	NAME	CONTACT DETAILS
Designated Safeguarding Lead / Alerting Manager (DSL) Designated Tutor for Adults in Local Authority Care Principal	Deb Rattley	drattley@chadsgrove.worcs.sch.uk 01527 871511 / 07791 612049
Deputy Designated Safeguarding Lead (DDSL) GET SAFE lead Online Safety Co-ordinator Vice Principal	Bec Gayden	rgayden@chadsgrove.worcs.sch.uk 01527 871511 ext. 336/319 07948 349584
Safeguarding Director Safeguarding in Education Advisor, WCF	Ms Denise Hannibal	dhannibal@worcschildrenfirst.org.uk 01905 844436 07825 531295
Assistant DSL	Leigh Blakeman	ljb165@chadsgrove.worcs.sch.uk
Chair of Directors	Franki Williams	fw.sendconsultancy@gmail.com
Vice Chair of Directors	Sally Keane	chairfip@carersworcs.org.uk
Prevent Lead/ Single Point of Contact (SPOC) Assistant DSL	Angela Macvie Chadsgrove School	amacvie@chadsgrove.worcs.sch.uk <u>01527 871511 / 07922 424866</u>
Worcestershire Adult Contact Team This number is to make a safeguarding referral		01905 768053
Worcestershire Adult Safeguarding Team This number is for safeguarding advice not referrals		01905 843189
Local Authority Designated Officer /Designated Adult Safeguarding Manager	Manager: Andrew Tombs	01905 846221 lado@worcschildrenfirst.org.uk
<p>To submit an online Cause for Concern notification go to: http://www.worcestershire.gov.uk/safeguardingadults</p>		

1. Introduction

- 1.1 The term 'adult at risk' is used in this Policy to replace 'vulnerable adult'. This is because the term 'vulnerable adult' may wrongly imply that some of the fault for any abuse lies with the victim of abuse. We use 'adult at risk' as an exact replacement for 'vulnerable adult' as that phrase is used throughout existing Government Guidance. An adult at risk is defined as an adult (18 years +) who is or may be in need of community care services by reason of mental or other disability, age or illness; and who is or may be unable to take care of him or herself, or unable to protect him or herself against significant harm or exploitation.
- 1.2 Safeguarding is the responsibility of everyone and this Policy applies to all individuals who come into contact with the students of Chadsgrove Educational Trust Specialist College (the College) including, but not limited to, staff, Directors, volunteers, students and visitors. It also applies to individuals who work on behalf of the College and its associated teams, for example staff working for Chadsgrove School or the Outreach Service.
- 1.3 The College recognises its moral and statutory responsibility to safeguard and promote the welfare of all students. The College endeavours to provide a safe and welcoming environment where all students are respected and valued. Staff are alert to the signs of abuse and neglect and follow clear procedures to ensure that students receive effective support, protection and justice. The protection of adults at risk forms a part of the College's safeguarding responsibilities.
- 1.4 All students attending the College have an EHC Plan that has been issued by their Local Authority. 'Place Led' funding for the students is provided by the EFSA. 'Top-up' or 'Needs-Led' funding is supplied by a student's Local Authority.
- 1.5 The College is on the site of Chadsgrove School and is able to access some of the facilities and resources of the school. As such, some of the guidance that is followed by the College and is included in this Policy may relate specifically to children (for example, Keeping Children Safe in Education). All guidance used is equally pertinent to the needs of the young adults and the staff working at the College.
- 1.6 The Directors ensure a whole College approach to safeguarding is in place. This means ensuring safeguarding and the protection of adults at risk are at the forefront and underpin all relevant aspects of process and policy development.
- 1.7 The aim of this Policy is to safeguard and promote student welfare, safety, health and well-being by creating an open, honest, caring and supportive environment. Student welfare is of paramount importance at all times.
- 1.8 The College adopts an open and accepting attitude towards students as part of its responsibility for pastoral care and, ultimately, all systems, processes and policies operate with the best interests of the students at their heart.
- 1.9 The College ensures that it complies with its duties under all relevant legislation. The College ensures this Policy and procedures are effective and comply with the law at all times, including training for all staff. The College also ensures that all working partners are aware of this Policy by displaying appropriate information in our reception area and on the College website and by raising awareness at meetings.
- 1.10 Safeguarding adults at risk at the College involves:
 - Reducing or preventing the risk of significant harm from neglect or abuse
 - Supporting students to maintain control of their own lives
 - Ensuring students can live in safety, free from abuse and neglect
 - Empowering students by encouraging them to make their own decisions and provide informed consent wherever possible
 - Preventing the risk of abuse or neglect and stop it from occurring
 - Promoting the well-being of students and taking their views, wishes, feelings and beliefs into account

- Preventing impairment of health or development
- Acting to enable students to have the best life chances and outcomes
- Following GET SAFE agenda

1.11 This Policy has been developed in accordance with the principles established by the:

- [West Midlands Adults Safeguarding Policy & Procedures Nov 2019](#)
- [Care Act 2014](#) which introduced new responsibilities for Local Authorities and puts adult safeguarding on a statutory footing
- [Data Protection Act 2018](#)
- [Deprivation of Liberty Safeguards](#), which have been designed to provide appropriate safeguards for vulnerable people who have a mental disorder and lack the capacity to consent to the arrangements made for their care or treatment, and who may be deprived of their liberty in their best interests in order to protect them from harm
- [Disclosure and Barring Service 2013](#) which outlines criminal record checks and guidance for employers
- [Human Rights Act 1998](#)
- [Mental Capacity Act 2005](#) whose general principle is that everybody has capacity unless it is proved otherwise, that they should be supported to make their own decisions, that anything done for or on behalf of people without capacity must be in their best interests and should be the least restrictive intervention
- [Mental Capacity Act Amendment Nov 2019](#). The Government consulted on replacing the DoLS in the Mental Capacity (Amendment) Bill in 2018, which passed into law in May 2019. Under the Mental Capacity (Amendment) Act 2019, the DoLS will be replaced by the Liberty Protection Safeguards (LPS). These were expected to take effect in Spring 2020 but have been delayed due to the COVID-19 pandemic
- [Modern Slavery Act 2015](#)
- [Policing and Crime Act 2017](#)
- [Protection of Freedoms Act 2012](#)
- [Safeguarding Vulnerable Groups Act 2006](#), which introduced the new Vetting and Barring Scheme and the role of the Independent Safeguarding Authority
- [Sexual Offences Act 2003](#), which introduced a number of new offences concerning adults at risk
- [Office of the Public Guardian Safeguarding Policy November 2015](#)

1.12 Underpinning guidance also includes:

- [Safeguarding adults: A National Framework of Standards for Good Practice in Adult Protection Work](#)
- [Working Together to Safeguard Children \(2018\)](#), which contains advice and guidance pertinent to the students attending the College
- [Keeping Children Safe in Education 2021](#), which contains advice and guidance pertinent to the students attending the College
- The procedures of the [Worcestershire Safeguarding Adults Board](#).
- Section 175 of the [Education Act 2002](#), which places a duty on schools and Local Authorities to safeguard and promote the welfare of students
- [The Children and Families Act 2014](#)
- [Ofsted Guidance and Procedures](#)
- [The School Staffing \(England\) Regulations 2009](#), which set out what must be recorded on the single central record and the requirement for at least one person on an interview/appointment panel to be trained in safer recruitment techniques
- [Statutory Guidance on Female Genital Mutilation](#), which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM
- [The Rehabilitation of Offenders Act 1974](#), which outlines when people with criminal convictions can work with children and adults at risk
- [Statutory Guidance on the Prevent duty](#), which explains schools' and colleges' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism
- [Teaching online safety in Schools](#) (DfE, June 2019)
- UK Council for Internet Safety (UKCIS) Guidance: [Education for a connected- world](#)

- National Crime Agency's CEOP Education Programme: [ThinkUKnow](#)
- Public Health England: [Rise Above](#), a programme from Public Health England to equip young people with coping strategies for modern life
- [Children Missing in Education](#) (Statutory Guidance)
- [Ending Domestic Abuse Save Lives](#)
- [Escalation Policy: Resolution of Professional Disagreements](#)
- [Get Safe](#) - keeping children and young people safe from criminal exploitation
- [Homeless Reduction Act Factsheets](#)
- [Mental Health and Behaviour in Schools Guidance](#)
- [Missing Children and Adults Strategy](#)
- [Preventing and Tackling Bullying, and Mental Health and Behaviour in Schools](#)
- [Preventing youth violence and gang involvement and its criminal exploitation of children and young people: County Lines Guidance](#)
- [Roles and Responsibilities of the Designated Teacher](#)
- [UK Safer Internet Centre: appropriate filtering and monitoring.](#)
- [Use of reasonable force in schools](#)
- [Worcestershire Children First Domestic Abuse Guidance](#)
- [Worcestershire Children First Levels of Needs Guidance](#)
- [Worcestershire Children First Children Missing from Education Guidance.](#)

1.13 The College fully recognises its moral and statutory responsibilities for safeguarding and promoting the welfare of adults at risk.

Staff at the College understand that adults at risk:

- Have the right to be protected from harm
- Need to be safe and to feel safe
- Need support which matches their individual needs
- Have the right to speak freely and voice their values and beliefs, and be provided with the necessary help and support to help them to do this
- Must be encouraged to respect each other's values and support each other
- Have the right to be supported to meet their emotional and social needs as well as their educational needs

1.14 All safeguarding work carried out by the College reflects the following key principles:

- **Empowerment**
Students should be consulted about the outcomes they want from the safeguarding process and this should directly inform what happens
- **Prevention**
It is better to take action before harm occurs. Students should be provided with easily understood information about what abuse is, how to recognise the signs and what they can do to seek help
- **Proportionality**
Students should be confident that the responses to risk will take into account their preferred outcomes or best interests and that the least intrusive response appropriate to the risk presented will be taken
- **Protection**
Students should be provided with support and representation and be enabled to take part in the safeguarding process as is appropriate to their needs or wishes
- **Partnership**
Students should be confident that information will be appropriately shared in a way that takes into account its personal and sensitive nature and that Agencies will work together to find the most effective responses for their individual circumstances
- **Accountability**
There should be accountability and transparency in delivering safeguarding and students should be clear about the roles and responsibilities of all those involved in reaching a solution to a problem

1.15 There are five main elements to this Policy:

- Ensuring we practice safer recruitment in checking the suitability of staff and volunteers to work with students
- Raising awareness of protection issues relating to students and equipping them with the skills needed to keep safe
- Developing and then implementing procedures for identifying and reporting cases, or suspected cases, of abuse
- Supporting students who have been identified as in need of help, support or protection in accordance with any agreed plans developed in collaboration with colleagues from Health, Social Care or other relevant organisations
- Establishing a safe environment in which students can learn and develop

1.16 This Policy will contribute to safeguarding and promoting the welfare of students at the College by:

- Clarifying standards of behaviour for staff and students
- Contributing to the establishment of a safe, resilient and robust ethos in the College, built on mutual respect and shared values
- Embedding appropriate work relating to safeguarding and welfare within the curriculum
- Guiding students into safely embarking upon work experience or community projects
- Alerting staff to the signs and indicators that all might not be well
- Developing staff awareness of the causes of abuse
- Developing staff awareness of the risks and vulnerabilities students face
- Addressing any concerns at the earliest possible stage
- Reducing the potential risks students face of being exposed to violence, extremism, exploitation or victimisation

1.17 The College responds robustly when concerns are raised or complaints made (from students and adults, including Parent Carers) as it is recognised that this promotes a safer environment and the College seeks to learn from complaints and comments. The College will take action and seek to resolve the concerns in a timely way, keeping people informed as to progress wherever possible.

2. Procedures

- 2.1 The College follows the West Midlands Adults' Safeguarding Board procedures as required by the Worcestershire Safeguarding Adults' Board (WSAB) and takes account of any guidance issued by the Department for Education (DfE). All referrals are made in line with local procedures as detailed on the [Worcestershire Safeguarding Adult's Board Website](#).
- 2.2 All staff are encouraged to report any concerns that they have and not see these as insignificant. On occasions, a referral is justified by a single incident such as an injury or disclosure of abuse. More often however, concerns accumulate over a period of time and are evidenced by building up a picture of harm over time; this is particularly true in cases of emotional abuse and neglect. In these circumstances, it is crucial that staff record and pass on concerns in accordance with this Policy to allow the DSL to build up a picture and access support for the adult at risk at the earliest opportunity. A reliance on memory without accurate and contemporaneous records of concern could lead to a failure to protect.
- 2.3 The Designated Safeguarding Lead (DSL) is used as a first point of contact for concerns and queries regarding any safeguarding concern. Any member of staff or visitor to the College 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 Safeguarding Lead (DDSL). In the absence of either of the above, or if they are unable to be contacted, the matter should be brought to the attention of the Assistant Safeguarding Lead (ASL), the most senior member of staff on site or Adult Social Care.
- 2.4 All concerns about a student should be reported without delay and recorded on CPOMS. The DSL should also be verbally informed that an incident is to be added to CPOMS.

- 2.5 Following receipt of any information raising concern, the DSL will consider what action to take. All information and actions taken, including the reasons for any decisions made, will be fully documented on CPOMS.
- 2.6 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.
- 2.7 If, at any point, there is a risk of immediate serious harm to a student, a referral will be made to Adult Social Care without delay. Anybody can make a referral. If the student's situation does not appear to be improving, any staff member with concerns should press for re-consideration by raising their concerns again with the DSL/Principal. Concerns should always lead to help for the student.
- 2.8 Staff should always follow the reporting procedures outlined in this Policy in the first instance. However, they may also share information directly with Adult Social Care Services, or the Police if:
- The situation is an emergency and the DSL, or their DDSL or ASL, are unavailable
 - They are convinced that a direct report is the only way to ensure the student's safety
- 2.9 Any member of staff who does not feel that concerns about a student has been responded to appropriately and in accordance with the procedures outlined in this Policy are requested to raise their concerns with the Chair of Directors.
- 2.10 If any member of staff does not feel the situation has been addressed appropriately at this point they are aware that they are able to contact social care directly with their concerns.
- 2.11 College procedures are regularly reviewed and updated at least annually unless an incident or new legislation or guidance requires the need for an interim review. The College recognises the expertise that staff build by undertaking safeguarding training and managing safeguarding concerns on a daily basis. They are, therefore, invited to shape this Policy and associated safeguarding arrangements.

3. Responsibilities

- 3.1 All adults working at the College:
- Are expected to have an awareness of safeguarding issues that can put students at risk of harm
 - Have a responsibility to safeguard and promote their welfare. This includes a responsibility to be alert to possible abuse and to record and report concerns to the DSL Staff should be aware that they may need to work with other services as needed and assist in making decisions about individual students
 - Understand their responsibility for referring any concerns in a timely manner and are aware that they may raise concerns directly with Adult Social Care Services if they believe their concerns have not been listened to or acted upon
 - Should always act in the best interest of the student
 - Ensure that the duty of care towards students and staff is promoted by raising awareness of illegal, unsafe and unwise behaviour and assisting staff to monitor their own standards and practice
 - Are expected to raise concerns about poor or unsafe practice and are aware of whistleblowing procedures and helplines
 - Should report concerns promptly to the Principal if they are concerned about the behaviour of a member of staff
 - Should engage with all training offered so that they are able to promptly identify the signs and symptoms of abuse, know how to report concerns and know how to record concerns clearly/effectively using the appropriate procedures
 - Should be aware of those adults whose vulnerabilities may indicate a greater need
 - Should be aware of the role they may play in supporting other Agencies and professionals in offering early help or support

- Understand their responsibilities in being alert to the signs of abuse and neglect including the specific issues of Sexual Exploitation, County Lines, Radicalisation and Extremism, Sexual Violence and Sexual Harassment
 - Are expected to maintain an attitude of 'it could happen here'
- 3.2 Community users organising activities for adults at risk at the College are aware of, and understand the need for compliance with, the College's guidelines and procedures in relation to the safeguarding of adults at risk.
- 3.3 The **Directors** will nominate a senior leader to take responsibility for safeguarding at the College. They will ensure that:
- The DSL takes lead responsibility for safeguarding and does not delegate this responsibility
 - The DSL and DDSL roles are explicit in their job descriptions
 - Safeguarding policies and procedures are in place, available on the College's website and reviewed annually
 - Mechanisms are in place to assist staff to understand and discharge their role and responsibilities
 - Termly reports on the effectiveness of the College's safeguarding procedures are presented to the Directors
 - Any weaknesses brought to its attention, relating to safeguarding, are remedied without delay
 - It complies with all legislative duties, including the duty to prevent students from being drawn into terrorism
 - The Safeguarding policies and procedures are fully implemented and followed by all staff
 - Sufficient funding, support, time and resources are allocated to enable the DSL and other staff to discharge their responsibilities with regard to student 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 against staff are reported to the Local Authority Designated Officer (LADO) / Designated Adult Safeguarding Manager (DASM) in a timely manner
 - Directors have an enhanced criminal records certificate from the DBS. It is the responsibility of the Directors to apply for the Certificate for any of their Directors who do not already have one. Being a member of the Directors is not a regulated activity and so Directors do not need a barred list check unless, in addition to their Director duties, they also engage in regulated activity.
 - The College carries out a Section 128 check for College Directors. Whilst not statutory in College, this is considered to be good practice
 - The College operates safer recruitment practices, including appropriate use of references and checks on new staff and volunteers
 - The Principal, a nominated Director and other staff involved in the recruitment process have undertaken Safer Recruitment Training
 - There are procedures for dealing with allegations of abuse against members of and other adults in a position of trust
 - There is a senior member of the management team who is designated to take lead responsibility for dealing with student protection (the "Designated Safeguarding Lead") and there is always cover for this role with appropriate arrangements for before/after College and out of term activities
 - The DSL undertakes effective training (in addition to basic safeguarding training) and this is refreshed every two years. In addition to this formal training, Staff should ensure that their knowledge and skills are updated at regular intervals (at least annually) via safeguarding e-briefings etc.
 - The Principal, and all other staff (including volunteers) who work with vulnerable young adults undertake appropriate training which is regularly updated (at least every year)
 - New staff and volunteers who work with vulnerable young adults are made aware of their responsibilities (including this Policy and [Part 1 of Keeping Children Safe in Education 2021](#)). Training should include indicators of FGM; early signs of radicalisation and extremism; indicators of vulnerability to radicalisation. This training should take place every 3 years

- The Chair of Directors (or, in the absence of a Chair, the Vice Chair) deals with any allegations of abuse made against the Principal, with advice and guidance from LADO/DASM
- Students are taught about safeguarding, including online safety, as part of a broad, balanced and appropriate curriculum
- The College complies with all legislative safeguarding duties, including the duty to prevent young people from being drawn into terrorism. In conjunction with the Principal/DSL they should assess the level of risk within the College and put actions in place to reduce that risk
- The College operates safer recruitment practices, including appropriate use of references and checks on new staff and volunteers; at least two members of staff on the interview panel will have undertaken Safer Recruitment training
- Effective policies and procedures are in place and updated annually including a behaviour “Code of Conduct” for staff and volunteers and the [“Guidance for Safer Working Practice for Those Who Work with Children in Education Settings”](#)
- Information is provided to the Local Authority (on behalf of the WSCP) when requested
- Safeguarding arrangements take into account the procedures and practice of the Local Authority and the Worcestershire Safeguarding Adults Board (WSAB)
- Safeguarding responses are put in place in cases where students go missing from education

3.4 The **Principal/DSL** will ensure that:

- The DSL will take lead responsibility for safeguarding across the College. They will take part in strategy discussions and inter-agency meetings, and contribute to the assessment of adults at risk. They will also advise and support other members of staff on student welfare and student protection matters as well as liaise with relevant agencies such as the Local Authority and Police
- The Safeguarding policies and procedures adopted by the Directors are effectively implemented and followed by all staff
- Sufficient resources and time are allocated to enable herself, as DSL, and other staff to discharge their responsibilities, including taking part in strategy discussions and other inter-agency meetings, and contributing to the assessment of adults at risk
- Allegations of abuse or concerns that a member of staff or adult working at the College may pose a risk of harm to a student are notified to the LADO/DASM in a timely manner
- All staff and volunteers feel able to raise concerns about poor or unsafe practice regarding students, and such concerns are addressed sensitively and effectively 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 Adult’s Social Care or the Police.
- Ensure that a referral is made to the DBS and/or Teaching Regulation Agency if a person in regulated activity has been dismissed or suspended or removed from regulated activity where the harm criteria is met or would have been had they not resigned
- The DSL and any DDSLs liaise with the safeguarding partners and work with other Agencies in line with [Working Together to Safeguard Children](#)
- When a DSL resigns their post or no longer has safeguarding protection responsibility, there will be a full face-to-face handover/exchange of information with the new post holder

3.5 The DSL and DDSL (Appendix B) will, together, co-ordinate action on safeguarding and promoting the welfare of students within the setting. The DSL and DDSL are responsible for:

- Organising ‘Safeguarding Induction Training’ for all newly appointed staff and whole staff training, refreshed at least every three years with annual updates as required
- During term time, the DSL and/or a DDSL is always available (during College hours) for staff in the College to discuss any safeguarding concerns. Whilst generally speaking the DSL (or DDSL) would be available in person, in exceptional circumstances availability via phone, video conference or other such media may be necessary. Appropriate cover arrangements are arranged for any out of hours/out of term activities
- Undertaking, in conjunction with the Directors, an annual audit of safeguarding procedures
- Referring students to the Adult Safeguarding Team when there are concerns about possible abuse and neglect

- Referring a student to the 'Channel Panel' when there are concerns about possible radicalisation or involvement in extremist groups
- Meeting regularly to ensure that both remain fully informed of all safeguarding issues, especially ongoing investigations and police investigations
- Liaising with other staff on matters of safeguarding and deciding whether to make a referral to relevant agencies
- Keeping electronic records, via CPOMS, of concerns about students, including the use of body maps, even where there is no need to refer the matter immediately
- Ensuring that any 'physical' safeguarding records are kept securely, separate from the main student file, and in locked or password protected locations
- Ensuring that all electronic safeguarding systems are logged out of when a computer is left unattended
- Ensuring that all safeguarding files are transferred in a safe and timely manner when a student moves settings and that a receipt of transfer is obtained
- Monitoring absence and reporting concerns in line with appropriate procedures
- Developing effective links with relevant Agencies and other professionals and co-operating, as required with their enquiries regarding safeguarding matters
- Co-ordinating a programme of safety, health and well-being through the curriculum, including issues of protective behaviours, healthy relationships, staying safe on-line, and the promotion of fundamental British Values.
- Acting as a source of support, advice and expertise for all staff
- Notify social care immediately if there is an unexplained absence of a student who is subject to a Multi-Agency Safeguarding Plan (Section 11 of the Care Act 2014)
- Monitor unauthorised absence, particularly where students go missing on repeated occasions and reporting concerns to Adult Social Care

3.6 The **DSL and Assistant DSL**

- The DDSL and ASL are trained to the same standard as the DSL. However, whilst the activities of the DSL may be delegated to appropriately trained DDSLs, the ultimate lead responsibility for safeguarding remains with the DSL. This responsibility is not delegated.

4. **Safeguarding in the Curriculum**

4.1 Students are taught about safeguarding at the College. The following areas are among those embedded into the Preparing for Adulthood Curriculum:

- Physical abuse – including assault, hitting, slapping, pushing, misuse of medication, restraint or inappropriate physical sanctions
- Domestic violence – including psychological, physical, sexual, financial, emotional abuse and so called 'honour' based violence
- Sexual abuse – including rape, indecent exposure, sexual harassment, inappropriate looking or touching, sexual teasing or innuendo, sexual photography, subjection to pornography or witnessing sexual acts, indecent exposure and sexual assault or sexual acts to which the adult has not consented or was pressured into consenting
- Psychological abuse – including emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, cyber bullying, isolation or unreasonable and unjustified withdrawal of services or supportive networks
- Financial or material abuse – including theft, fraud, internet scamming, coercion in relation to an adult's financial affairs or arrangements, including in connection with wills, property, inheritance or financial transactions, or the misuse or misappropriation of property, possessions or benefits
- Modern slavery – encompasses slavery, human trafficking, forced labour and domestic servitude. Traffickers and slave masters use whatever means they have at their disposal to coerce, deceive and force individuals into a life of abuse, servitude and inhumane treatment
- Discriminatory abuse – including forms of harassment, slurs or similar treatment; because of race, gender and gender identity, age, disability, sexual orientation or religion
- Organisational abuse – including neglect and poor care practice within an institution or specific care setting such as a hospital or care home, for example, or in relation to care

provided in one's own home. This may range from one off incidents to ongoing ill treatment. It can be through neglect or poor professional practice as a result of the structure, policies, processes and practices within an organisation

- Neglect and acts of omission – including ignoring medical, emotional or physical care needs, failure to provide access to appropriate health, care and support or educational services, the withholding of the necessities of life, such as medication, adequate nutrition and heating
- Self-neglect – this covers a wide range of behaviour neglecting to care for one's personal hygiene, health or surroundings and includes behaviour such as hoarding
- Peer on peer abuse – this topic is integral to our curriculum offer. College staff recognise that adults at risk are vulnerable to physical, sexual and emotional abuse by their peers

4.2 As part of providing a broad and balanced curriculum, safeguarding is delivered at a developmentally appropriate level to students. Where appropriate, student's access weekly sessions where issues such as the above are both addressed on a planned basis and also on a needs led basis as and when issues arise.

4.3 It is recognised that a one size fits all approach is not appropriate and that a more personalised or contextualised approach is more suited to the very specific needs of the students at the College. The way in which safeguarding issues are taught very much depends upon the level of ability/understanding of the students involved.

5. Training

5.1 When staff join the College, they are informed of the arrangements for safeguarding adults at risks. They are given a copy of:

- This Policy including its Appendices
- The student behaviour Policy
- Part 1 and Annex A of Keeping Children Safe in Education 2021
- The College's Code of Conduct.

They will also be told who the DSL is, who acts in their absence and what this role includes. Staff are required to sign a form stating that they have read and understood each of these documents.

5.2 All Staff are aware of systems within the College which support safeguarding and these are explained to them as part of Staff Induction. Induction training and information includes:

- The Safeguarding Policy
- The Behaviour Policy (which includes measures to prevent bullying, including cyberbullying)
- The Staff Code of Conduct
- The safeguarding response to students who go missing from education
- The role of the DSL (including the identity of the DSL and any DDSLs)
- Copies of all relevant policies and a copy of Part One of Keeping Children Safe in Education 2021
- Information relating to signs and symptoms of abuse
- How to manage a disclosure
- When and how to record a safeguarding concern
- Advice on safe working practice

5.3 As part of the induction process new staff who start at the College mid-year will access on-line adult safeguarding training. All staff complete the online adult safeguarding training every 2 years.

5.4 All volunteers, supply staff, and regular visitors to the College are given a copy of this Policy, the name of the DSL and DDSL and informed of the College's procedures for reporting concerns.

5.5 All staff receive regular safeguarding training that includes the principles of safer working practice, signs and symptoms of abuse and neglect, as well as specific safeguarding issues, such as sexual exploitation, radicalisation, on-line safety, peer on peer abuse, sexual violence and sexual harassment. Training also includes how to record and report abuse both within the College and to Social Care.

- 5.6 Training generally takes the form of face to face training every three years. In addition, staff receive safeguarding updates from the DSL as required, but at least annually. Face to face training is delivered to all new staff at the start of each academic year in order to ensure that they receive this training before joining the usual three-year cycle.
- 5.7 Through their ongoing training, all staff:
- Are aware of the signs and symptoms of abuse and neglect as well as specific safeguarding issues
 - Are aware of the local early help process and understand their role in it
 - Are aware of the process for making referrals to Adult Social Care, along with the role they might be expected to play in such assessments
 - Know what to do if a student tells them he/she is being abused, exploited, or neglected
 - Learn how to manage the requirement to maintain an appropriate level of confidentiality. This means only involving those who need to be involved, such as the DSL (or a DDSL) and Adult Social Care
 - Understand that they must never promise a student that they will not tell anyone about a report of any form of abuse, as this may ultimately not be in the best interests of the student
 - Are able to reassure victims that they are being taken seriously and that they will be supported and kept safe
 - 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 Adult Social Care or to the Police.
- 5.8 The DSL (and any DDSLs or ADSLs) undergo training to provide them with the knowledge and skills required to carry out the role. This training is updated at least every two years and includes Prevent Awareness Training. The training provides Designated Safeguarding Leads with a good understanding of their own role, and the processes, procedures and responsibilities of other agencies, so they:
- Understand the assessment process for providing early help and statutory intervention, including local criteria for action and Local Authority Social Care referral arrangements
 - Ensure each member of staff has access to, and understands, the College's Safeguarding Policy and procedures
 - Are alert to the specific needs of individual students
 - Understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the General Data Protection Regulations
 - Understand the importance of information sharing, both within college and with the other agencies, organisations and practitioners
 - Understand and support the College with regards to the requirements of the Prevent Duty and are able to provide advice and support to staff on protecting students from the risk of radicalisation
 - Understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep students safe whilst they are on-line at the College
 - Can recognise the additional risks that young adults with SEND and disabilities (SEND) face online, for example, from online bullying, grooming and radicalisation and are confident they have the capability to support SEND students to stay safe online
 - Obtain access to resources and attend any relevant or refresher training courses
 - Encourage a culture of listening to students and taking account of their wishes and feelings, among all staff, in any measures the College may put in place to protect them
- 5.9 In addition to formal training the DSL (and any DDSLs) also update their knowledge and skills via briefings, network meetings and seminars, at regular intervals and at least annually.
- 5.10 Staff with management responsibilities undertake further relevant training in safeguarding related issues such as Sexual Exploitation, Radicalisation (WRAP training), Sexual Violence and Sexual Harassment and the Management of Allegations of Abuse. They then cascade the learning from this training to the rest of the staff.

6. Supporting Students

- 6.1 The College recognises that students who are abused or who witness violence may find it difficult to develop a sense of self-worth and view the world in a positive way. For such students College may be one of the few stable, secure and predictable components of their lives. Other students may be vulnerable because, for instance, they have a disability, are in supported living, or are experiencing some form of neglect. The College seeks to remove any barriers that may exist in being able to recognise abuse or neglect in students with SEND. We will seek to provide such students with the necessary support to build their self-esteem and confidence.
- 6.2 The College will:
- Establish and maintain an ethos where students feel secure and are encouraged to talk and are listened to
 - Ensure that students know that there are adults in the College whom they can approach if they are worried or are in difficulty
 - Ensure there are systems in place for students to express their views and give feedback e.g. through student voice, safety questionnaires and participation in curriculum activities
 - Ensure that, where possible, the student's thoughts/wishes and feelings are sought and recorded on all referrals
 - Include, in the curriculum, activities and opportunities which equip students with the skills they need to stay safe from abuse (including online) and to know where to get help
 - Ensure every effort is made to establish effective working relationships with Parent Carers and colleagues from other Agencies
 - Operate safer recruitment procedures and make sure that all appropriate checks are carried out on new staff, Directors and volunteers who work with students including identity, right to work, enhanced DBS criminal record and barred list (and overseas where needed), references, and prohibition from teaching or managing in education (s.128)
 - As Education Safeguarding Practitioners, liaise with the three safeguarding partners in line with Working Together to Safeguard Children 2018 (updated December 2020)
- 6.3 The College will endeavour to support all students by:
- Encouraging self-esteem and self-assertiveness through the curriculum, as well as promoting respectful relationships, challenging bullying and humiliating behaviour
 - Promoting a positive, supportive and secure environment giving students a sense of being valued
 - Consistently applying the College Behaviour Policy which is aimed at supporting adults at risk. The College will ensure that students know that some behaviour is unacceptable but that they are valued and not to be blamed for any abuse which has occurred
 - Liaising with other agencies that support the student such as Adult's Social Care Services, Mental Health Services and those agencies involved in the safeguarding of adults at risk
 - Making use of Early Help Services, when appropriate
 - Notifying Adult Social Care Services immediately when there is a significant concern
 - Providing continuing support to a student about whom there have been concerns, who leaves the College, by ensuring that appropriate information is forwarded under confidential cover or securely via CPOMS to the student's new setting
- 6.4 Staff are made aware of the fact that some students at the College, because of their learning and/or physical disability, are vulnerable and may find it more difficult to recognise and report abuse. The College, therefore, recognises that it must take particular care, when working with student with disabilities.

7. Multi-Agency Working, Information Sharing and Confidentiality

- 7.1 The College has a pivotal role to play in multi-agency safeguarding arrangements. The Directors ensure that the College contributes to multi-agency working in line with [Working Together to Safeguard Children](#). At College, leaders and the Directors understand the local safeguarding arrangements and work with partners from Worcestershire Safeguarding Adults Board (WSAB) to

safeguard and promote the welfare of adults at risk, including identifying and responding to their needs.

- 7.2 Information sharing is vital in identifying and tackling all forms of abuse. All staff are made aware that they have a professional responsibility to share information with other agencies in order to safeguard adults at risk. Staff understand that information sharing is vital in identifying and tackling all forms of abuse and are proactive in sharing information as early as possible to help identify, assess, and respond to risks or concerns about the safety and welfare of students, whether this is when problems are first emerging, or where a student is already known to Local Authority Adult Social Care.
- 7.3 College staff recognise that all matters relating to the safeguarding of adults at risk are confidential. The DSL or the DDSL will disclose any information about a young person to other members of staff on a need to know basis only.
- 7.4 All College staff are made aware that they cannot promise a student that they will keep secrets which might compromise their safety or well-being.
- 7.5 When a student about whom concerns have been raised and recorded leaves the College, the DSL will consider if it would be appropriate to share information with any new setting in advance of the student leaving to ensure that support is in place for when he/she arrives.
- 7.6 The College is part of the Local Authority Safeguarding Network Group. This is open to organisations who directly deliver services to adults at risk, including voluntary sector and services that operate at a district level. The purpose of the group is to share information about safeguarding, including details on any recently published Safeguarding Adults Reviews and the learning which has come from them. They also look at how to address issues which don't meet the Section 42 criteria of the Care Act 2014 including presentations on topics which have a relevance to safeguarding.
- 7.7 The College works with Worcestershire County Council (WCC), Worcestershire Children First (WCF), Social Care, the Police, Health Services and other services to promote the welfare of students and protect them from harm. This includes providing a coordinated offer of early help when additional needs of students are identified and contributing to inter-agency plans to provide additional support to adults at risk.
- 7.8 Where an adult at risk is suffering, or is likely to suffer from harm, the College will make a referral to Adult Social Care and, if appropriate, the police immediately. Referrals will follow the local referral process. At the College, staff allow access for Adult Social Care from the Local Authority and, where appropriate, from a placing Local Authority, for that Authority to conduct, or to consider whether to conduct, an assessment under Section 42 of the Care Act 2014. The College will provide as much information as possible as part of the referral process. This will allow any assessment to consider all the available evidence and enable a contextual approach to addressing such harm.
- 7.9 On occasions, there will be disagreements between professionals as to how concerns are handled and these can impact on effective working relationships. The College will support staff to promote positive partnerships within the College and with other Agencies and will ensure that staff are aware of how to escalate concerns and disagreements if appropriate and use the [WSAB Escalation Procedures](#) if necessary.
- 7.10 Staff understand that The Data Protection Act 2018 and UK GDPR do not prevent the sharing of information for the purposes of keeping students safe. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of students.
- 7.11 All personal information will be processed fairly and lawfully in line with the College's duties under the Data Protection Act 2018 and GDPR and will be held safely and securely. However, College

staff recognise that this is not a barrier to sharing information where the failure to do so would result in a student being placed at risk of harm.

7.12 The College is aware that, among other obligations, the Data Protection Act 2018 and the GDPR place duties on organisations and individuals to process personal information fairly and lawfully and to keep the information they hold safe and secure. The College maintains, stores and disposes of information relating to the safeguarding and protection of students in line with these obligations and the Data Protection: Toolkit for Schools.

7.13 The College:

- Is confident of the processing conditions which allows it to store and share information for safeguarding purposes, including information, which is sensitive and personal, and is treated as 'special category personal data'
- Understands that 'safeguarding individuals at risk' is a processing condition that allows practitioners to share special category personal data. This includes allowing practitioners to share information without consent where there is good reason to do so, and that the sharing of information will enhance the safeguarding of students in a timely manner, but it is not possible to gain consent, it cannot be reasonably expected that a practitioner gains consent, or if to gain consent would place a student at risk
- Understands that not providing student personal data where the serious harm test under the legislation is met, the College will withhold providing the data in compliance with College's obligations under the Data Protection Act 2018 and the UK GDPR. If in doubt the College will seek independent legal advice

8. Early Help

8.1 Any student may benefit from early help. Staff at the College are experienced and appropriately trained to identify the potential need for early help for any student who:

- Is disabled or has special educational needs (whether or not they have an EHC Plan)
- Has a mental health need
- Is a carer
- Is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines
- Is frequently missing/goes missing from care or from home
- Is at risk of modern slavery, trafficking, sexual or criminal exploitation
- Is at risk of being radicalised or exploited
- Has a family member in prison, or is affected by parental offending
- Is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- Is misusing drugs or alcohol themselves
- Has returned home to their family from care
- Is at risk of 'honour' based abuse such as Female Genital Mutilation or Forced Marriage
- Is in supported living
- Is persistently absent from education, including persistent absences for part of the College day

9. Specific Safeguarding Issues in Education

9.1 KCSIE 2021 requires staff working in educational settings to be aware of specific safeguarding issues. These are identified below.

Abuse and Neglect (Appendix C)

9.2 All staff at the College are aware of indicators of abuse and neglect. As part of their safeguarding training, Staff know what signs to look for to identify early signs of abuse and neglect and specific safeguarding issues such as criminal exploitation and sexual exploitation to safeguard those who may be in need of help or protection. If staff are unsure, they always speak to the DSL or DDSL.

- 9.3 All College staff are aware that technology is a significant component in many safeguarding and wellbeing issues. Students are at risk of abuse online as well as face to face. In many cases abuse will take place concurrently via online channels and in daily life.

Students Missing Education

- 9.4 College staff recognise that a student going missing from education is a potential indicator of abuse or neglect. As such, attendance, absence and exclusions are closely monitored.
- 9.5 Staff will make every attempt to obtain at least two emergency contact numbers for each student registered at the College in order to ensure that they are able to make contact with a responsible adult when a student missing education is also identified as a welfare and/or safeguarding concern.
- 9.6 College staff will also ensure that they follow the procedures for dealing with students that go missing from education, particularly on repeat occasions, in order to help identify the risk of abuse and neglect, including sexual exploitation, and to help prevent the risks of them going missing in future.

Sexual Exploitation (Appendix D)

- 9.7 College staff recognise that sexual exploitation is a form of sexual abuse involving criminal behaviours against adults at risk which can have a long-lasting adverse impact on their physical and emotional health. Sexual exploitation involves an individual or group of adults taking advantage of the vulnerability of an individual. Victims can be male or female. Adults at risk 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 trafficking. Young adults with learning difficulties or disabilities are particularly vulnerable to such exploitation.
- 9.8 Sexual Exploitation does not always involve physical contact; it can occur through the use of technology. It can also include both contact (penetrative and non-penetrative acts) and non-contact sexual activity and may occur without the individual's immediate knowledge (e.g. through others copying videos or images they have created and posted on social media).
- 9.9 The College addresses the risks of sexual exploitation, as appropriate, through the curriculum. A common feature of sexual exploitation is that the individual concerned often doesn't recognise the coercive nature of the relationship and doesn't see themselves as a victim. They 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.
- 9.10 All staff, volunteers and Directors are made aware of the indicators of sexual exploitation, the fact that the victim may have been sexually exploited even if the sexual activity appears consensual. All concerns of sexual exploitation are reported immediately to the DSL.
- 9.11 The DSL will use the Safeguarding Worcestershire CSE Screening Tool, to support decision making, on occasions when there is a concern that a student is being, or is at risk of being, sexually exploited. In all cases if the tool identifies any level of concern the DSL will contact Adult Social Care. If a student is in immediate danger the police will be called on 999.

Criminal Exploitation (CE) and County Lines (Appendix E) GET SAFE

- 9.12 CE is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive an adult at risk into any criminal activity:
- In exchange for something the victim needs or wants, and/or
 - For the financial or other advantage of the perpetrator or facilitator and/or
 - Through violence or the threat of violence
- 9.13 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". Typically, the gang exploits young or vulnerable people to store and/or supply drugs, move cash and to secure the use of homes belonging to adults at risk. There is a cross over between sexual exploitation and

County Lines and young people are sometimes required to offer sex in order to pay off perceived debts.

- 9.14 Concerns about adults at risk being possibly involved are passed to the DSL who will refer to Police and/or other agencies as appropriate.

Domestic Abuse (Appendix F)

- 9.15 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 abuse.
- 9.16 College staff recognise that exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on students. In some cases, a young person may blame themselves for the abuse or may have had to leave the family home as a result. Domestic abuse affecting adults at risk can also occur within their personal relationships as well as in the context of their home life.
- 9.17 College staff will ensure that students are educated to ensure they understand what a healthy relationship looks like.
- 9.18 All concerns regarding domestic abuse are reported to the DSL, who will ensure that appropriate support is available to the young person and make referrals to Adult Social Care if the threshold for intervention is met.

Extremism and Radicalisation (Appendix I)

- 9.19 The College is subject to a duty, under section 26 of the Counter-Terrorism and Security Act 2015 (CTSA 2015), to have “due regard to the need to prevent people from being drawn into terrorism”. This is known as the Prevent Duty.
- 9.20 The Prevent Duty is part of the College’s wider safeguarding obligations. The DSL’s and other College leaders are familiar with the revised Prevent Duty Guidance and the local procedures for making a Prevent referral.
- 9.21 Terrorism is an action that:
- Endangers or causes serious violence to a person/people
 - Causes serious damage to property or
 - Seriously interferes or disrupts an electronic system
- The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.
- 9.22 Extremism is defined as a ‘vocal or active opposition to fundamental British Values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs’. We also include in our definition of extremism calls for the death of members of our Armed Forces, whether in this country or overseas.
- 9.23 Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.
- 9.24 Adults at risk are vulnerable to extremist ideology and radicalisation. Some, as a result of this, are at risk of being radicalised; adopting beliefs and engaging in activities which are harmful, criminal or dangerous. Similar to protecting students from other forms of harms and abuse, protecting students from this risk is a part of the College’s safeguarding approach.
- 9.25 The College is clear that exploitation of adults at risk and radicalisation should be viewed as a safeguarding concern and follows the Department for Education Guidance for schools and college providers on preventing children and young people from being drawn into terrorism.

- 9.26 The College seeks to protect students 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.
- 9.27 When any member of staff has concerns that a student may be at risk of radicalisation or involvement in terrorism, they are expected to follow normal safeguarding procedures and report this to the DSL and report it on CPOMS. The DSL will then speak with the Single Point of Contact SPOC. If the matter is urgent then the Police will be contacted by dialling 999. In non-urgent cases where police advice is sought then the 101 service will be used. The Department of Education has also set up a dedicated telephone helpline schools and colleges to raise concerns around Prevent (020 7340 7264).
- 9.28 Through training, staff, volunteers and Directors will have an understanding of what radicalisation and extremism is, why they need to be vigilant in the College and how to respond when concerns arise. In addition:
- There are systems in place for keeping students safe from extremist material when accessing the internet in the College by using effective filtering and usage policies
 - The SPOC has received Prevent training and will act as the point of contact within the College for any concerns relating to radicalisation and extremism
 - The SPOC will make referrals in accordance with West Mercia Adult Safeguarding procedures and will represent our College at Channel meetings as required
 - The College will use relevant information, tools and resources to help staff and parent carers recognise and address extremism and radicalisation in young people, for example the 'Educate Against Hate' website
- 9.29 Channel is a voluntary, confidential support programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. Prevent referrals may be passed to a multi-agency Channel panel, which will discuss the individual referred to determine whether they are vulnerable to being drawn into terrorism and consider the appropriate support required. A representative from the College will be available to attend the Channel panel to help with this assessment should this be necessary.
- 9.30 Through the curriculum, College staff promote the spiritual, moral, social and cultural development of adults at risk. They encourage 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.
- 9.31 The Single Point of Contact (SPOC) for the College is Angela Macvie.

'Honour Based' Abuse

- 9.32 College staff recognise that they are well placed to identify concerns and take action to prevent adults at risk from becoming victims of so-called 'honour-based' abuse (HBA) and provide guidance on these issues through safeguarding training. If staff have a concern regarding a young person that might be at risk of HBA they are aware that they should inform the DSL who will activate local safeguarding procedures, using existing national and local protocols for multiagency liaison with police and social care.
- 9.33 So called '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, forced marriage, and practices such as breast ironing, which are described in more detail below.
- 9.34 Female Genital Mutilation (FGM), explained further in Appendix G, is illegal in England and Wales under the FGM Act (2003). It is a form of abuse and violence against women. It is important to keep in mind that parent carers may not see FGM or Breast Ironing as a form of abuse; however, they may be under a great deal of pressure from their community and or family to subject their daughters to it.

- 9.35 Where staff have concerns relating to FGM they should report this to the DSL and follow the College safeguarding procedures
- 9.36 Although students at the College are unlikely to be at significant risk of FGM, due to their age, it is still important for College staff to be aware of possible signs and indicators as the risk to both students and their younger siblings may still be present.
- 9.37 A forced marriage (See Appendix H) is a marriage in which one or both people do not (or in cases of people with learning disabilities cannot) consent to the marriage and where violence, threats or any other form of coercion is used to cause a person to enter into the marriage. Threats can be physical or emotional and psychological.
- 9.38 Some perpetrators use perceived cultural practices as a way to coerce a person into marriage. Staff at the College understand that they could potentially play an important role in safeguarding adults at risk from forced marriage and seek support from the Local Authority as well as organisations such as The Forced Marriage Unit as appropriate (Contact: 020 7008 0151 or email fm@fco.gov.uk).
- 9.39 Forced marriage is recognised in the UK as a form of violence and a serious abuse of human rights. Since June 2014 forcing someone to marry has become a criminal offence in England and Wales under the Anti-Social Behaviour, Crime and Policing Act 2014.
- 9.40 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.
- 9.41 The College will contact Adult Social Care when they have a concern about a student. If the concerns are based on more concrete indicators – for example, the young person says this is going to happen to them, or discloses that it has happened to them or to an older sister the College will contact the Police.
- 9.42 College Staff will not:
- Contact the parent carers before seeking advice from Adult Social Care
 - Make any attempt to mediate between the young person and their parent carers. Attempts to mediate may place the young person at greater risk, and the family may feel so threatened at the news of the disclosure that they bring forward their plans or take action to silence the young person
- 9.43 In the same way that we talk about the 'one chance rule' in respect of young people coming forward with fears around FGM, young people disclosing fears that they are going to be sent abroad for forced marriage are taking the 'one chance', of seeking help. As such, it is essential that the College staff take such concerns seriously and act without delay.

Modern Slavery

- 9.44 [The Modern Slavery Act 2015](#) places a new statutory duty on public authorities 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 bears this obligation where it has 'reasonable grounds to believe that a person may be a victim of modern slavery or human trafficking'. College staff are aware of this duty and inform the DSL should they suspect or receive information that students or their carers may be victims of modern slavery. The DSL will then contact the NCA.

Peer on Peer Abuse (including sexual violence and sexual harassment) (Appendix J)

- 9.45 College staff recognise that adults at risk are vulnerable to physical, sexual and emotional abuse by their peers.
- 9.46 Peer on peer abuse can take many forms. It is most likely to include, but may not be limited to:
- Bullying (including cyberbullying, prejudice-based and discriminatory bullying)
 - Abuse in intimate personal relationships between peers

- Actual or threatening physical abuse
- Sexual violence, sexual harassment or non-consensual sexual activity
- Sexual imagery (Sexting)
- Upskirting
- Initiation/hazing type violence and rituals
- Physical abuse

- 9.47 Such abuse is always taken seriously and the same safeguarding procedures apply in respect of any student who is suffering or likely to suffer significant harm. Staff are aware that they must never tolerate or dismiss concerns relating to peer on peer abuse and must not pass it off as 'banter' or 'just having a laugh'.
- 9.48 The College's Policy on Anti-Bullying is set out in a separate policy and acknowledges that to allow or condone bullying may lead to consideration under safeguarding procedures.
- 9.49 All incidences of bullying, including cyber-bullying, sexting, racist, homophobic and gender-related bullying, are dealt with in accordance with the Anti-Bullying Policy. College staff recognise that adults at risk with special needs and/or disabilities are more susceptible to being bullied. A log of bullying incidents in the College is maintained via CPOMS.
- 9.50 College Staff recognise that there will be occasions when bullying incidents will fall within safeguarding procedures or may be deemed criminal activity and that it may be necessary to report the concerns to Social Care or to the Police.
- 9.51 College staff are expected to understand, that even if there are no reports of peer on peer abuse at 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 DSL or DDSL immediately.
- 9.52 The DSL ensures that, through training, staff, volunteers and Directors have an understanding of the range of peer on peer abuse, including sexual violence and sexual harassment, and are aware of how to recognise and manage such issues. Staff are also made aware that some groups are potentially more at risk, for example girls, students with SEND and LGBT students.
- 9.53 Staff are made aware that such incidents and/or behaviours can occur and be associated with factors outside of the College. As such, staff, and particularly the DSL, know to consider the context in which such incidents and/or behaviours occur.
- 9.54 Where the abuse is physical, verbal, bullying or cyber-bullying, recording of such incidents and sanctions will be applied in line with the College's Behaviour and Anti-Bullying policies. All such incidents are recorded on CPOMS.
- 9.55 Support for the victims of abuse will also be in line with the College's Behaviour and Anti-Bullying Policies. For victims of sexual abuse, College Staff are advised to follow advice given by Social Care and consider using external agencies, such as West Mercia Rape and Sexual Abuse Support Centre to support any strategies that they may be able to provide within the College.
- 9.56 Depending on the nature of abuse, College staff may need to consider providing measures to protect and support the victim, the alleged perpetrator and other adults at risk and/or staff in the College by means of a Risk Assessment. The Risk Assessment will be recorded and kept under review.
- 9.57 The College will carefully consider any report of sexual violence and/or sexual harassment. Important considerations will include:
- The wishes of the victim in terms of how they want to proceed. The College will enable victims to be given as much control as is reasonably possible over decisions regarding how any investigation will be progressed and any support that they will be offered. This will however need to be balanced with the College's duty and responsibilities to protect adults at risk

- The nature of the alleged incident(s), including whether a crime may have been committed and consideration of harmful sexual behaviour
- The developmental stages of the student involved. Any student will likely experience stress as a result of being the subject of allegations and/or negative reactions by their peers to the allegations against them
- Any power imbalance between those involved
- 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)
- The need to safeguard the victim (and the wider student body)
- The need to provide the alleged perpetrator(s) with an education – staff will need to safeguard and support as appropriate and implement any disciplinary sanctions
- The need to consider the proportionality of the response. Support (and sanctions) should be considered on a case-by-case basis

- 9.58 It is recognised that the alleged perpetrator(s) may potentially have unmet needs as well as potentially posing a risk of harm to other peers. Harmful sexual behaviours may be a symptom of either their own abuse or exposure to abusive practices and or materials. Advice will be taken, as appropriate, from Adult Social Care, specialist sexual violence services and the Police.
- 9.59 Staff at the College are made aware of the range of risk factors which increase the likelihood of involvement in serious violence, such as being male, having been frequently absent or permanently excluded from education, having experienced child maltreatment and having been involved in offending, such as theft or robbery.
- 9.60 Any report of sexual violence is likely to be traumatic for the victim. However, reports of rape and assault by penetration are likely to be especially difficult with regard to the victim, and close proximity with the alleged perpetrator(s) is likely to be especially distressing. Whilst the College establishes the facts of the case and starts the process of liaising with Adult Social Care and the police, the alleged perpetrator(s) will be removed from any classes they share with the victim. The College will also consider how best to keep the victim and alleged perpetrator(s) a reasonable distance apart on College premises (including during any before or after College-based activities and on transport to and from the College, where appropriate). These actions are in the best interests of all students involved and should not be perceived to be a judgment on the guilt of the alleged perpetrator(s).
- 9.61 The College will consider every report on a case-by-case basis. When to inform the alleged perpetrator(s) will be a decision that should be carefully considered. Where a report is going to be made to Adult Social Care and/or the police, then, as a general rule, the College will speak to the relevant Agency and discuss next steps and how the alleged perpetrator(s) will be informed of the allegations. However, as per general safeguarding principles, this does not and will not prevent the College from taking immediate action to safeguard students, where required.
- 9.62 If an alleged perpetrator moves to another educational institution (for any reason), the College will inform the new educational institution of any ongoing support needs and where appropriate, potential risks to other students and staff. The DSL will take responsibility to ensure this happens as well as transferring the safeguarding file.

Homelessness

- 9.63 Being homeless or being at risk of becoming homeless presents a real risk to a persons' welfare. The DSL (and any DDSLs) are aware of contact details and referral routes in to the Local Housing Authority so they can raise or progress concerns at the earliest opportunity.
- 9.64 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 Adult Social Care where a student has been harmed or is at risk of harm.

- 9.65 The Homelessness Reduction Act 2017 placed 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 duties shift focus to early intervention and encourages those at risk to seek support as soon as possible, before they are facing a homelessness crisis.

10. Online Safety

- 10.1 The College ensures that students are safeguarded from potentially harmful and inappropriate online material. An effective whole College approach to online safety empowers the College to protect and educate students and staff in their use of technology and establishes mechanisms to identify, intervene in, and escalate any concerns where appropriate.
- 10.2 The DSL and DDSL understand the unique risks associated with online safety. They have the relevant knowledge and up to date capability required to keep adults at risk safe whilst they are online at the College.
- 10.3 The DSL and DDSL are able to recognise the additional risks that adults at risk with SEND and disabilities face online, for example from online bullying, grooming and radicalisation and have the capability to support SEND students to stay safe online.
- 10.4 All members of College Staff are trained in and receive regular updates about online safety and recognising and reporting concerns.
- 10.5 The College's Acceptable Use Policy recognises that internet safety is a whole College responsibility (staff, students, Directors, volunteers and parent carers).
- 10.6 Students at the College may expose themselves to danger, whether knowingly or unknowingly, when using the internet and other technologies. Additionally, some students may find themselves involved in activities which are inappropriate or possibly illegal. The College therefore recognises the responsibility to educate its' students, teaching them the appropriate behaviours and critical thinking skills to enable them to remain both safe and legal when using the internet and related technologies.
- 10.7 The College does all it reasonably can to limit student's exposure to online risks from College's IT system. As part of this process, the Directors ensure that the College has appropriate filters and monitoring systems in place. Such filters are in place to prevent access to unsuitable sites and monitor the use of the College's network and internet to ensure that any student or staff member attempting to access inappropriate, abusive or harmful material is appropriately advised and/or supported. The 'Futures Cloud' application is used for this purpose.
- 10.8 Whilst it is essential that the College ensures that appropriate filters and monitoring systems are in place, there is flexibility (through the set-up of Future Cloud and liaison with Netbuilder, The College's IT provider) to prevent "over blocking" leading to unreasonable restrictions as to what students can be taught with regard to online teaching and safeguarding.
- 10.9 Staff at the College ensure online safety is a running and interrelated theme whilst devising and implementing policies and procedures including how online safety is reflected in other relevant policies. The College considers online safety whilst planning the curriculum, any tutor training, the role and responsibilities of the DSL and engaging with parent carers to raise an awareness in order to support students.
- 10.10 The College's approach to online safety includes a clear policy on the use of mobile technology.

11. Racist Incidents

- 11.1 The College's policy on racist incidents is set out in a separate policy and acknowledges that repeated racist incidents or a single serious incident may lead to consideration under safeguarding procedures. Staff maintain a log of racist incidents in the College via CPOMS.

12. Special Educational Needs and Disability (SEND) (Appendix K)

- 12.1 Staff recognise that adults at risk with Special Educational Needs and Disabilities can face additional safeguarding challenges and these are discussed in staff training. These additional barriers can include:
- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the young person's disability without further exploration
 - Being more prone to peer group isolation
 - Assumptions that state approved care-givers are providing safe care for the young person
 - Being disproportionately impacted by behaviours such as bullying without outwardly showing any signs
 - Communication barriers and difficulties in overcoming these barriers
- 12.2 It is recognised that students, due to their learning disability and possible related conditions and needs will rely on staff to provide basic care needs along with support for communication and learning. This puts students in a less powerful position than staff and as a result they are more likely to experience abuse than other young adults.
- 12.3 College staff always consider extra pastoral support for students with SEND to address these additional challenges.

13. Mental Health

- 13.1 All staff are aware that mental health problems can, in some cases, be an indicator that a person has suffered or is at risk of suffering abuse, neglect or exploitation.
- 13.2 Where students have suffered abuse and neglect, or other potentially traumatic adverse experiences, this can have a lasting impact well into adulthood. It is key that staff are aware of how these experiences, can impact on their mental health, behaviour and education.
- 13.3 Whilst it is acknowledged that only appropriately trained professionals should attempt to make a diagnosis of a mental health problem, College staff, however, are well placed to observe students day to day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.
- 13.4 If staff have a mental health concern about a student that is also a safeguarding concern, they are aware that immediate action should be taken, following the Safeguarding Policy and speaking to the DSL or a DDSL without delay.
- 13.5 The College has access to a range of advice to help them identify students in need of extra mental health support, this includes working with external agencies. More information can be found in the [mental health and behaviour in schools guidance](#) and colleges are advised to follow this guidance as best practice. Public Health England has also produced a range of resources to support education practitioners to promote positive health, wellbeing, and resilience among students.

14. Contextualised Safeguarding

- 14.1 All staff are aware that safeguarding incidents and/or behaviours can be associated with factors outside The College and/or can occur between students outside of these environments. All staff, but especially the DSL (and DDSLs) are aware that they need to consider whether students are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and adults at risk can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, and serious violence.

15. Restrictive Physical Intervention / Use of Reasonable Force

- 15.1 There are circumstances when it is appropriate for staff in College to use reasonable force to safeguard students. The term 'reasonable force' covers the broad range of actions used by staff that involve a degree of physical contact to control or restrain. This can range from guiding students to safety by the arm, to more extreme circumstances such as breaking up a fight or where a young person needs to be restrained to prevent violence or injury. 'Reasonable' in these circumstances means 'using no more force than is needed'. The use of force may involve either passive physical contact, such as standing between students or blocking a student's path, or active physical contact such as leading a student by the arm out of the classroom.
- 15.2 The College's Policy on Restrictive Physical Intervention is set out in the Behaviour 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.
- 15.3 The College staff acknowledge that when applying reasonable force in response to risks presented by incidents involving students with SEND or disabilities or with medical conditions, it is important to recognise their additional vulnerability and to make every effort to reduce the occurrence of challenging behaviour and the need to use reasonable force.
- 15.4 The College staff understand that physical intervention of a nature that causes injury or distress to a young person may be considered under Management of Allegations or disciplinary procedures.
- 15.5 The College staff who are likely to need to use physical intervention will be appropriately trained in the Team Teach technique. All incidences of physical intervention will be recorded in accordance with the Team Teach recommended procedures.
- 15.6 The College recognises that touch is appropriate in the context of working with students with complex needs who require high levels of personal care and supervision and all staff have been given 'Safe Working Practice' guidance to ensure they are clear about their professional boundaries. College staff recognise that the adoption of a 'no contact' policy could leave them unable to fully support and protect the students in their care.

16. Record Keeping, Monitoring and Transfer (Appendix N)

- 16.1 Any member of staff receiving a disclosure of abuse from a student, or noticing signs or symptoms of possible abuse, completes an on-line incident form (via CPOMS), as soon as possible and certainly before the end of the working day, noting exactly what was said, using the students' own words as far as possible. CPOMS automatically times and dates the incident as well as the name of the member of staff submitting it. CPOMS records are separate from the normal student and staff records with access confined to specific staff.
- 16.2 All records of a safeguarding nature are forwarded, via CPOMS, to the DSL. The DSL will also be verbally informed that they will be receiving an alert.
- 16.3 All concerns, discussions and decisions made, and the reasons for those decisions, are recorded on CPOMS.
- 16.4 Records held on CPOMS include:
- A clear and comprehensive summary of the concern
 - Details of how the concern was followed up and resolved
 - A note of any action taken, decisions reached and the outcome
- If in doubt about recording requirements, staff are expected to discuss this with the DSL (or DDSL).
- 16.5 Access to safeguarding information in CPOMS can only be accessed via a two factor authentication system by staff with the appropriate level of access assigned to them by the CPOMS administrator. CPOMS maintains a complete record of who has accessed an individual's file and when this occurred.

- 16.6 Any referrals made to other agencies, including referrals to Adult Social Care, are copied prior to sending and stored in the young person's file on CPOMS.
- 16.7 The DSL maintains and regularly audits the safeguarding records on CPOMS, ensuring that each file includes a chronology of significant events and that information is accurate and up-to-date.
- 16.8 The DSL transfers students safeguarding records in a safe and timely manner when a young person moves to a different setting, ensuring that a receipt of transfer is obtained. (See Appendix N)
- 16.9 The DSL may retain an archived copy of the student's safeguarding records generated by the College prior to transfer and retain for as long as is necessary (normally DOB + 25 years), where there is justification for believing that the records may be required as evidence of the College's involvement with the student for statutory purposes (e.g. court cases). When the records are no longer required, they are deleted/securely disposed of.
- 16.10 A record of any allegations (proven) made against staff is kept in a confidential file by the Principal and held for a period of 6 years.

17. Communication with Parent Carers

- 17.1 College staff recognise that good communication with parent carers is crucial in order to safeguard and promote the welfare of students effectively.
- 17.2 The College will always undertake appropriate discussion with parent carers prior to involvement of another agency unless to do so would place the student at further risk of harm or would impede a criminal investigation.
- 17.3 The College will ensure that parent carers have an understanding of the responsibilities placed on the College and staff to safeguard adults at risk and their duty to co-operate with other agencies in this respect. This is achieved through newsletters and information on the College website.

18. Supporting and Supervision of Staff

- 18.1 It is recognised that staff working in the College who have become involved with a student who has suffered harm, or appears to be likely to suffer harm, may find the situation stressful and upsetting.
- 18.2 The Principal will support such staff by providing an opportunity to talk through their anxieties with herself or the DDSL and to seek further support such as counselling or regular supervision, as appropriate.
- 18.3 In order to reduce the risk of allegations being made against College staff, and ensure that staff are competent, confident and safe to work with adults at risk, they are made aware of safer working practice guidance and are given opportunities, in training, to develop their understanding of what constitutes safe and unsafe behaviour.

19. Safer Recruitment and Selection of Staff

- 19.1 The College has a written Recruitment and Selection Policy Statement and procedures linking explicitly to this Policy. The statement is included in all job advertisements, publicity material, recruitment websites, and candidate information packs.
- 19.2 The recruitment process is robust in seeking to establish the commitment of candidates to support the College's measures to safeguard adults at risk and to identify, deter or reject people who might pose a risk of harm to students or are otherwise unsuited to work with them.
- 19.3 References are requested and scrutinised for all candidates prior to interview and any discrepancies or concerns are raised and discussed during interview, including for any volunteers and internal candidates. References are always requested directly from the referee and verified

as being from a senior person with appropriate authority; electronic references are checked to ensure they originate from a legitimate source. Where specific questions have not been answered satisfactorily or insufficient information is provided, the referee will be contacted directly for further clarification. Where references are not forthcoming, despite reminders, the candidate will be asked to provide an alternative referee.

- 19.4 All staff working within the College have been checked as to their suitability, including verification of their identity, qualifications and a satisfactory, enhanced DBS check (including barred list check) and a right to work in the UK. For members of staff who remain employed at the College, the check will be repeated every four years.
- 19.5 All qualified tutors working within the College have been checked using the Teacher Services website to ensure they have been awarded QTS, they have completed their teacher induction and that there are no prohibitions, sanctions or restrictions in place that might prevent them from taking part in certain activities or working in specific positions e.g. management posts. Unqualified tutors are checked for any prohibitions, sanctions or restrictions using the Teaching Regulation Agency website.
- 19.6 The College seeks written assurance from supply and third-party agencies, alternative providers and contractors that they have undertaken all appropriate checks on any of their staff that work with or have regular contact with students.
- 19.7 All Directors are subject to the minimal of an enhanced DBS check without barred list check. Barred lists checks are made for Directors who also work in the main school.
- 19.8 The College maintains a Single Central Record of recruitment checks for audit purposes.
- 19.9 Any member of staff working in regulated activity prior to receipt of a satisfactory DBS check will not be left unsupervised and is subject to a Risk Assessment.
- 19.10 Volunteers who are working in regulated activity will be supervised at all times. A Risk Assessment will be undertaken to help decide whether or not an enhanced DBS check, without barred list check, is required.

20. Allegations against Staff / Abuse of Position of Trust

- 20.1 The College is mindful of the position of trust that staff are in when working within an education setting. College staff recognise this and acknowledge that it could be considered a criminal offence to abuse that trust.
- 20.2 The College also acknowledges that allegations may be made against a member of staff or volunteer. The College will respond robustly when concerns are raised or complaints made as it recognises that this promotes a safer environment and it seeks to learn from complaints and comments. The College will take action and seek to resolve the concerns in a timely way, keeping people informed as to progress wherever possible.
- 20.3 The College has its' own procedures for dealing with allegations against a member of staff, supply tutor, volunteer or contractor. These procedures are consistent with local safeguarding procedures and practice guidance. A 'Case Manager', with training in the management of allegations will lead any investigation, including the appointment of an appropriately trained Investigative Officer. This will be either the Principal or, where the Principal is the subject of an allegation, the Chair of Directors.
- 20.4 If an allegation is made against a Director, The College will follow their own local procedures. Where an allegation is substantiated, the College will follow the procedures to consider removing them from office.
- 20.5 Where the College is made aware that the Secretary of State has made an Interim Prohibition Order, in respect of an individual who works at the College, it will take immediate action to ensure

the individual does not carry out work in contravention of the order. This means that pending the findings of the TRA investigation, the individual will not carry out teaching work. The College has a clear policy on pay arrangements whilst the person is suspended or where there is an Interim Prohibition Order in place.

- 20.6 Suspension is not an automatic response when an allegation is reported. All options to avoid suspension will be considered prior to taking that step. In many cases, an inquiry can be resolved quickly and without the need for suspension. The employer will decide on whether the individual should continue to work at the College based on consultation with the LADO/DASM who will provide relevant information received from the Police or Adult Social Care on whether they have any objections to the member of staff continuing to work during the investigation of the case.
- 20.7 All 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). If staff have safeguarding concerns, or an allegation is made about another member of staff (including supply staff and volunteers) posing a risk of harm to students, then this will be referred to the Principal. Where there are concerns/allegations about the Principal this will be referred to the Chair of Directors.
- 20.8 The College does not, currently, employ teaching or support staff from employment agencies. However, in some circumstances, the College may need to consider an allegation against an individual not directly employed by them, where its disciplinary procedures do not fully apply, for example, supply tutors provided by an employment agency or business. Supply tutors, whilst not employed by the College, would still be under the supervision, direction and control of the Directors when working in the College.
- 20.9 Where the College is not the employer of an individual it still has a responsibility to ensure allegations are dealt with appropriately and that it liaises with relevant parties. The College will not decide to cease to use a supply tutor due to safeguarding concerns, without finding out the facts and liaising with the LADO/DASM to determine a suitable outcome. The Directors will discuss with the agency whether it is appropriate to suspend the supply tutor, or redeploy them to another part of the College, whilst they carry out their investigation.
- 20.10 Agencies should be fully involved and co-operate with any enquiries from the LADO/DASM, police and/or Adult Social Care. It is likely that the College will take the lead in any investigation because agencies do not have direct access to students or other College staff, so they will not be able to collect the facts when an allegation is made, nor do they have all the relevant information required by the LADO/DASM as part of the referral process.
- 20.11 If any Agency were to be used, the College would inform the agency of its process for managing allegations. This would include inviting the agency's human resource manager or equivalent to meetings and keeping them up to date with information about its policies.
- 20.12 Allegations against a tutor who is no longer teaching will be referred to the police as will historical allegations of abuse.
- 20.13 Publication of material that may lead to the identification of a tutor who is the subject of an allegation is prohibited by law; this includes verbal conversations or written material including content placed on social media sites.

21. Complaints or Concerns expressed by Students, Parent Carers, Staff or Volunteers

- 21.1 The College recognises that listening to students is an important and essential part of safeguarding them against abuse and neglect. To this end, any expression of dissatisfaction or disquiet in relation to an individual student will be listened to and acted upon in order to safeguard their welfare.
- 21.2 College staff will seek to ensure that the student or adult who makes a complaint is informed not only about the action the College will take but also the length of time that will be required to

resolve the complaint. The College will also endeavour to keep the student or adult regularly informed as to the progress of their complaint.

22. Photography and Use of Images

- 22.1 The welfare and protection of students at the College is paramount and consideration is always given to whether the use of photography will place them at risk. It is recognised that images may be used to harm adults at risk, for example as a preliminary to 'grooming' or by displaying them inappropriately on the internet, particularly social networking sites.
- 22.2 For this reason, consent is always sought when photographing students using any means and including iPads, smart phones or cameras and additional consideration is given to photographing adults at risk, particularly those known to be fleeing domestic violence. Consent is sought directly from the young person if they are able to provide this or from their parent carer if, as a result of their learning difficulties, they are unable to do so.
- 22.3 Many adults at risk own or have access to handheld devices and they are encouraged to consider measures to keep themselves safe when using the internet and social media at home and in the community. Parent carers who continue to support adults at risk as a result of their learning difficulties are also advised as necessary.
- 22.4 Only iPads, smart phones and cameras that are owned by the College are used for photographs. Staff are asked never to use personal devices.

23. Staff/Student Relationships

- 23.1 The College provides advice to staff regarding their personal online activity and has strict rules regarding online contact and electronic communication with students. Staff found to be in breach of these rules may be subject to disciplinary action or a safeguarding investigation.
- 23.2 Staff/student relationships are governed by the Staff Code of Conduct which all staff are required to read.
- 23.3 Any relationship between a staff member and student outside of the College i.e. in a paid or unpaid capacity must be declared, by the staff member, to the Principal in order to discuss appropriate working conditions that do not compromise confidentiality or the rights of the student and avoid a conflict of interest on behalf of the staff member.
- 23.4 Staff must not engage in any personal, sexual relationship with a student in line with the Sexual Offences Act 2003. This is illegal and would constitute immediate disciplinary action.

24. Health & Safety

- 24.1 The College's Health & Safety Policy, set out in a separate document, reflects the consideration given to the safeguarding of adults at risk both within the College and when off-site, for example when undertaking trips and visits.
- 24.2 Risk assessments are undertaken and reviewed regularly, in respect of site security, the risk of students being drawn into terrorism or exposed to extremist behaviour, and the risk to and from students displaying harmful behaviour.
- 24.3 The College undertakes appropriate risk assessments and checks in respect of all equipment and of the building and grounds in line with local and national guidance and regulations concerning health and safety.
- 24.4 The College has adequate security arrangements in place in respect of the use of its grounds and buildings by visitors both in and out of College hours.

- 24.5 Visitors to the College, for example visiting speakers or curriculum specialists, are appropriately checked and vetted, to ensure they are not linked to extremist groups or promoting extremist or other harmful material. This includes any necessary research by the organiser of the visit, ID checks on arrival at the College and supervision, whilst on site, by a member of staff.

25. Inspection

- 25.1 Since September 2019, Ofsted's inspections of post-16 provision are carried out under Ofsted's Education Inspection Framework. Inspectors will always report on whether or not arrangements for safeguarding learners are effective. In addition to the framework and inspections handbooks, Ofsted publishes specific guidance to inspectors on inspecting safeguarding: Inspecting safeguarding in early years, education and skills settings.
- 25.2 The College pays full regard to all relevant Ofsted guidance.

26. Monitoring and Evaluation

- 26.1 This Safeguarding Policy and procedures will be monitored and evaluated by:
- Completion of an annual safeguarding audit
 - Completion of a termly safeguarding report to the Directors
 - Surveys and questionnaires from the adults at risk and their parent carers
 - Discussions with adults at risk and staff
 - Scrutiny of data and risk assessments
 - Scrutiny of the College's single central record of recruitment checks
 - Scrutiny of Directors minutes
 - Monitoring of logs of bullying/racist/behaviour incidents and PPI records
 - Supervision of staff involved in safeguarding students at College
 - Case file audits undertaken by the DSL and WSAB

27. Other Relevant Policies

- 27.1 The Director's statutory responsibility for safeguarding the welfare of adults at risk goes beyond basic safeguarding procedures.
- 27.2 The duty is to ensure that safeguarding permeates all activity and functions. This Policy therefore complements and supports a range of other policies, including:
- Staff Code of Conduct
 - Behaviour, Exclusions, Liberty Safeguarding and Positive Physical Intervention
 - Positive Touch
 - Mental Capacity & Consent
 - Anti-Bullying and Harassment
 - Manual Handling
 - Educational Trips
 - Work Related Learning
 - Medical Interventions
 - Health and Safety
 - Intimate Care
 - RSE & PSHE
 - Equality and Diversity
 - Online safety and Acceptable Internet Use
 - Whistleblowing (Confidential Reporting)
- 27.3 The above list is not exhaustive but, when undertaking development or planning of any kind, College staff will need to consider safeguarding matters.

28. Contacts

External	WSAB	safeguardingadultsbo@worcestershire.gov.uk SWilks@worcestershire.gov.uk
	Local Authority Designated Officer: Andrew Tombs	01905 846221 lado@worcschildrenfirst.org.uk
	Designated Adult Safeguarding Manager	
	Police – Prevent team: DS Stuart Clark	01386 591835 stuart.clark@westmercia.pnn.police.uk
	Ofsted	Tel: 0300 123 1231
	Women’s Aid (24hr. Helpline)	Tel: 0800 980 3331
	West Mercia Rape and Sexual Abuse Support Centre (WMRSASC)	Tel: 01905 724514

Training and Independent Support	Chris and Eve Johnston Create Safer Organisations (CSO)	07970 340846 createsaferorgs@btinternet.com
	Worcestershire Children First CPD Online	workforcesupport@worcschildrenfirst.org.uk

Appendices

- a) COVID-19 Safeguarding Addendum
- b) DSL Roles & Responsibilities
- c) Signs and symptoms of abuse
- d) Sexual Exploitation
- e) Criminal Exploitation/County Lines
- f) Effects of Domestic Abuse on Adults At Risk
- g) Female Genital Mutilation
- h) Forced Marriage
- i) Radicalisation and Extremism
- j) Peer on Peer Abuse, Sexual Harassment and Sexual Violence Guidelines
- k) Students with a Disability
- l) Online Safety
- m) Allegations or complaints made against a member of Staff or Volunteer
- n) Transfer Record Sheet

Appendix A – COVID-19 Addendum

1. Introduction

- 1.1. From 20th March 2020 parent carers were asked to keep their son/daughter at home, wherever possible, Colleges were asked to provide care for a limited number of young adults, those who are vulnerable and those whose parent carers are critical to the COVID-19 response and could not be safely cared for at home.
- 1.2. The College fully re-opened from September 2020. However, due to the unpredictability of the current situation, the information within this addendum remains in force.

2. Scope

- 2.1. This addendum applies during any period of College closure due to COVID-19, and reflects updated advice from Worcestershire Local Authority (LA) and our 3 local safeguarding partners:
 - Worcestershire County Council
 - West Mercia Police
 - NHS South Worcestershire, NHS Wyre Forest and NHS Redditch and Bromsgrove Clinical Commissioning Groups (CCGs)
- 2.2. This Addendum sets out changes to our normal Safeguarding and Vulnerable Adults Protection Policy (Policy Number 1) in light of any changes to the function / organisation of the College as a result of the pandemic. Unless covered here, that Policy continues to apply.

3. Definitions

- 3.1. The College's definition of 'vulnerable' includes those who:
 - Have a social worker, including young adults:
 - With a Safeguarding Adults Plan
 - Provided with services by Adult Social Care
 - Have an Education, Health and Care (EHC) Plan (up to age 25)
- 3.2. As a result of this definition all students at the College are considered 'vulnerable'.

4. Risk Assessments

- 4.1. Whether closed, partly open or fully open, the College is committed to ensuring the safety and welfare of all of its students at all times.
- 4.2. All students at College have been subject to an initial risk assessment in consultation with parent carers, to decide whether they need to continue to be offered a College place in order to meet their needs, or whether they can safely have their needs met at home should a full lockdown occur. From March to the end of May 2020 these Risk Assessments deemed all students to be safer at home, with support from parent carers. This was due to the fact that all students at the College were considered to have underlying health or physical difficulties and their very high levels of care needs meant that appropriate social distancing could not be maintained. This decision was subject to an ongoing review, and due to the Government easing of lockdown and encouragement to welcome more students back to College from the 15th June 2020, the students that were assessed as higher risk were been carefully integrated back into College.
- 4.3. Since September 2020, the College has been opened to all students and will continue to be so unless further risk assessments deem it to be unsafe by the Government or as a result of an outbreak of COVID-19 linked to the College.
- 4.4. Should there be any further closure of the College, many young people with EHC plans can safely remain at home. However, there is an expectation that vulnerable adults who have a social worker will attend a College, so long as they do not have underlying health conditions that put them at risk. Students are admitted to the College because they have a physical disability and /

or complex health need. Underlying health conditions are experienced by all but a very small minority of students.

- 4.5. Senior leaders, especially the DSL (and DDSL) know who the most vulnerable young adults are and are able to engage with health services and social care in order to support families should the need arise.
- 4.6. Whilst the College is an Independent Services Provider a Memorandum of Understanding has been agreed between the College Directors and Chadsgrove School Governors to enable the two providers to work alongside each other as a wider community. During these unprecedented circumstances the two providers may be required to work together. Risk Assessments will be completed to mitigate any risks this may impose.

5. Core Safeguarding Principles

- 5.1. During any period of closure, the College will still have full regard to any statutory safeguarding guidance, as stated in the Safeguarding Policy.
- 5.2. During any closure, although the College would be operating in a different way to normal, all Staff will still expected to adhere to the important safeguarding principles:
 - The best interests of students must come first
 - If anyone has a safeguarding concern about any student, they should continue to act on it immediately
 - A DSL or DDSL should be available at all times (see section 7 for details of the arrangements)
 - It's essential that unsuitable people don't enter the College workforce or gain access to young adults
 - Students should continue to be protected when they are online

6. Reporting Concerns

- 6.1. During any period of closure, all staff and volunteers must continue to act on any concerns they have about a student immediately. It is still vitally important to do this, both for any student that may attend College and those at home.
- 6.2. Reporting concerns will not change – the DSL should be alerted, though this will be through a phone call, rather than face to face, and then CPOMS should be completed. If the DSL cannot be contacted by phone, then it is important to contact one of the other identified DSLs in order to ensure that a concern has been passed on. CPOMS should not be relied upon, solely, to communicate with the DSL.
- 6.3. Staff are reminded of the need to report any concern immediately and without delay.

7. DSL (and deputy) Arrangements

- 7.1. During any period of closure, the College aims to have a trained DSL or DDSL contactable at all times. Details of all important contacts are listed in the 'Important Contacts' section at the start of this Addendum. Should the College be opened at any point, then a trained DSL from the College or Chadsgrove School will be on site and the DSL and DDSL named in this Policy will be contactable by telephone at all times.
- 7.2. The College or Chadsgrove School will keep all College Staff informed by email as to who will be the DSL (or DDSL) on any given day, and how to contact them. Telephone numbers are included at the start of this addendum.
- 7.3. The College will ensure that DSLs (and DDSLs), wherever their location, know who the most vulnerable young adults in the College are.

- 7.4. On occasions where there is no DSL or DDSL contactable, a senior leader from Chadsgrove School will take responsibility for co-ordinating safeguarding. This will be Angela Macvie, Deputy Head, ADSL. Angela can be contacted using the information at the start of this document.
- 7.5. The senior leader will be responsible for liaising with the DSL (or DDSL) to make sure they (the senior leader) can:
 - Identify the most vulnerable students in College
 - Update and manage access to vulnerable adults safeguarding files, where necessary
 - Liaise with Adult Social Care
- 7.6. All DSLs and DDSLs have full access to CPOMS and are able to view the records of all students in College, including when they are off-site.
- 7.7. The DSL will continue to engage with social workers, and attend all multi-agency meetings, which can be done remotely.

8. Working with Other Agencies

- 8.1. During any period of closure, the College will continue to work with and support the young adults social care team, the Special School Nursing and Community Learning Disabilities Teams. The lead person for this will be Rebecca Gayden.
- 8.2. Chadsgrove will continue to update this addendum as necessary, to reflect any updated guidance from:
 - The three local safeguarding partners
 - The Local Authority about young adults with Education, Health and Care (EHC) Plans
 - The Local Authority Designated Officer
 - Young Adults Social Care

9. Monitoring Attendance

- 9.1. If the College is subject to a closure as a result of COVID-19 and as students will not be attending during this time, the College will not complete its usual attendance registers or be following the usual procedures to follow up absence. Instead, weekly contact with families will be made through telephone, text or visits to the home if necessary.
- 9.2. The exception to this is where, should the College reopen to some students, any student we expect to attend College doesn't attend, or stops attending, staff will:
 - Follow up on their absence with their Parent Carer, by text, phone call or home visit if necessary
 - Notify their social worker, where they have one
- 9.3. The College will make arrangements with parent carers to make sure up-to-date emergency contact details, and additional contact details where possible, are available. These will be checked with the information held on our data systems and updated on this system, as necessary.

10. Peer-On-Peer Abuse

- 10.1. The College will continue to follow the principles set out in part 5 of Keeping Children Safe in Education when managing reports and supporting victims of peer-on-peer abuse.
- 10.2. Staff will continue to act on any concerns they have immediately, about both students attending College and those at home.
- 10.3. Reporting concerns will not change – the DSL will be alerted, though this will be through a phone call, rather than face to face and then CPOMS will be completed. If the DSL cannot be contacted by phone, then it is important to contact one of the other identified DSLs in order to ensure that a

concern has been passed on. CPOMS should not be relied upon to communicate with the DSL and concerns should not be ignored if the DSL is unavailable. Staff are reminded that Adult Social Care can always be contacted directly, by any member of staff, if necessary

11. Concerns about a Staff Member or Volunteer

- 11.1. The College will continue to follow the principles set out in in the Safeguarding Policy.
- 11.2. Staff will continue to act on any concerns they have immediately – whether those concerns are about staff or volunteers working both onsite or remotely.
- 11.3. Procedures for reporting concerns will not change – staff will contact the Principal if they are concerned about a member of staff and the Chair of Directors if their concerns relate to the Principal. All contact details can be found at the beginning of this addendum.
- 11.4. College will continue to refer adults who have harmed or pose a risk of harm to a child or vulnerable adult to the Disclosure and Barring Service (DBS).
- 11.5. College will continue to refer potential cases of tutor misconduct to the Teaching Regulation Agency'. We will do this using the email address Misconduct.Teacher@education.gov.uk for the duration of the COVID-19 period, in line with Government Guidance.

12. Support young adults who aren't 'Vulnerable' but where there are Concerns

- 12.1. Whilst the College remains fully or partially closed, or risk assessments confirm that a student is safer at home, the College will put a contact plan in place for those students who don't meet the Department for Education's definition of 'vulnerable', but who the College does have safeguarding concerns about. These may include young adults who have previously had a social worker, or who haven't met the threshold for a referral but where staff have raised concerns, as explained in section 13 below.

13. Contact Plans

- 13.1. The College will have contact plans in place for all students from College, regardless of the level of their vulnerability. However, the nature of this contact will vary depending upon any assessed risk.
- 13.2. Each young adult has an individual plan which sets out:
 - How often the College will make contact – this will be at least once a week
 - Which staff member(s) will make contact – as far as possible, this will be staff who know the family well
 - How staff will make contact – this will be over the phone, doorstep visits, or a combination of both
- 13.3. The DSL will agree these plans with Adult Social Care where relevant, and will review them weekly.
- 13.4. If staff can't make contact through the agreed means, staff may
 - Contact extended family members for whom there is details on our data system
 - Try an alternative method of communication, for example, text or email
 - Contact health colleagues, for example, the Community Learning Disabilities Team, to see if they have had any contact
 - Contact the student's Social Worker if they have one
 - Contact the family front door or the police if we feel that a student may be in danger or at risk of significant harm

14. Safeguarding all Students

- 14.1. Staff and volunteers are aware that any College closure potentially puts all students at greater risk and the College is committed to ensuring the safety and wellbeing of all of its students.
- 14.2. Staff and volunteers will continue to be alert to any signs of abuse, or effects on students' mental health that are also safeguarding concerns, and act on these concerns immediately in line with the procedures set out in section 6 above.
- 14.3. Where the DSL has identified a student to be on the edge of social care support, or who would normally receive pastoral type support in the College, they will ensure that a robust communication plan is in place for that young person or their family.
- 14.4. For students at home, College staff will look out for signs like:
 - Not engaging in College systems
 - No contact from the student's family
 - Seeming more withdrawn during any check-ins, visits to the home or video calls
 - Indications from parent carer that they are having difficulty managing the needs of their son/daughter
- 14.5. Young adults maybe likely to be spending more time online during any period of closure – see Section 15 below for our approach to online safety both in and outside the College.
- 14.6. See section 16 below for information on how we will support students' mental health.
- 14.7. College will share safeguarding messages on its website and social media pages.

15. Online Safety (Appendix L)

In College

- 15.1. The College will continue to have appropriate filtering and monitoring systems in place in College and on all laptops used off-site.
- 15.2. If IT staff are unavailable, our contingency plan involves contacting Netbuilder who offer regular technical support service and with whom the College holds an SLA. Netbuilder can be contacted on 01905 770882.

Outside College

- 15.3. Where staff are interacting with students online, they will continue to follow our existing staff Code of Conduct and Acceptable Use Policies.
- 15.4. Online teaching should follow the same principles as set out in the College's Code of Conduct.
- 15.5. Chadsgrove will ensure any use of online learning tools and systems is in line with privacy and data protection/GDPR requirements.
- 15.6. Below are some things that will be considered when delivering virtual lessons, especially where webcams are involved:
 - No 1:1's, groups only, preferable with at least two members of staff
 - Staff and students must wear suitable clothing, as should anyone else in the household
 - Any computers used should be in appropriate areas, for example, not in bedrooms and attention paid to whatever may be in the background
 - Any live classes, should these be used, should be recorded so that if any issues were to arise, the video can be reviewed
 - Live classes should be kept to a reasonable length of time, or the streaming may prevent the family 'getting on' with their day
 - Language must be professional and appropriate, including any family members in the background
 - Staff must only use platforms agreed by the College to communicate with pupils

- Staff should record, the length, time, date and attendance of any sessions held.
- 15.7. Staff will continue to be alert to signs that a student may be at risk of harm online, and act on any concerns immediately, following our reporting procedures as set out in Section 6 of this Addendum.
- 15.8. Staff will make sure students and families know how to report any concerns they have back to College, and signpost them to other sources of support too.

Working with Parent Carers

- 15.9. The College will ensure that Parent Carers:
- Are aware of the potential risks to students online and the importance of staying safe online
 - Know what the College is asking students to do online, including what sites they will be using and who they will be interacting with from the College
 - Are aware that they should only use reputable online companies or tutors if they wish to supplement the remote teaching and resources the College provides
 - Know where else they can go for support to keep their son/daughter safe online

16. Mental Health

- 16.1. It is recognised that the College is a protective factor for students and the current circumstances, can affect the mental health of students as well as their Parent Carers. Tutors at the College need to be aware of this in setting expectations of students' work when they are at home.
- 16.2. Where possible, the College will continue to offer its current support for student mental health for all students. This will depend upon the needs of individual students but may involve, for example, offering Books Beyond Words sessions, in small groups, via video conference instead of face-to-face in the College.
- 16.3. The College will also signpost all Students, parent carers and staff to other resources to support good mental health. This information can be found in the Home Learning section of the College website.

17. Recruitment, Training and Induction

Recruiting New Staff and Volunteers

- 17.1. The College will continue to recognise the importance of robust safer recruitment procedures, so that adults and volunteers who work in the College are safe to work with vulnerable young adults.
- 17.2. The College will continue to follow its safer recruitment procedures during any period of closure.
- 17.3. In urgent cases, when validating proof of identity documents to apply for a DBS check, the College will initially accept verification of scanned documents via online video link, rather than being in physical possession of the original documents. This approach is in line with revised guidance from the DBS.
- 17.4. New staff must still present the original documents when they first attend work at the College.
- 17.5. The College will continue to do its' usual checks on new volunteers, and do risk assessments to decide whether volunteers who aren't in regulated activity should have an enhanced DBS check, in accordance with Keeping Children Safe in Education 2021.
- 17.6. Under no circumstances will a volunteer who has not been checked be left unsupervised or allowed to work in regulated activity.

Staff 'On Loan' from other educational establishments (other than Chadsgrove School)

- 17.7. Currently, this situation is not likely to arise. However, if staff are deployed from another education or children's workforce setting to the College, the College will take into account the DfE

supplementary guidance on safeguarding during the COVID-19 pandemic and will accept portability as long as the current employer confirms in writing that:

- The individual has been subject to an enhanced DBS and barred list check
- There are no known concerns about the individual's suitability to work with children and young adults
- There is no ongoing disciplinary investigation relating to that individual

These checks will be completed by Lorraine Binns, College Administrator who will be supported by Jacqueline Pitt, Chadsgrove School Business Manager.

17.8. Upon arrival, they will be given a copy of the College's Safeguarding Policy, this Addendum, confirmation of College procedures and confirmation of DSL arrangements.

17.9. The College will also use the DBS Update Service, where these staff have signed up to it, in order to check for any new information.

Safeguarding Induction and Training

17.10. Face to face DSL training is very unlikely to take place whilst there remains a threat of the COVID-19.

17.11. For the period COVID-19 measures are in place, a DSL (DDSL) who has been trained will continue to be classed as a trained DSL (or DDSL) even if they miss their refresher training.

17.12. All existing College staff have had safeguarding training and have read part 1 of Keeping Children Safe in Education (2021). The DSL should communicate with staff any new local arrangements, so they know what to do if they are worried about a student.

17.13. New staff and volunteers will continue to receive:

- A safeguarding induction
- A copy of the Safeguarding Policy (and this Addendum)
- Keeping Children Safe in Education Part 1

17.14. The College will decide on a case by case basis what level of safeguarding induction staff 'on loan' need. In most cases, this will be:

- A copy of the Safeguarding Policy and this Addendum
- Confirmation of local processes
- Confirmation of DSL arrangements

Keeping records of who's on site

17.15. Whilst acknowledging the challenge a pandemic such as COVID-19, it is essential from a safeguarding perspective that the College is aware, on any given day, which staff/volunteers will be on site, and that appropriate checks have been carried out, especially for anyone engaging in regulated activity. As such, the College will keep the single central record (SCR) up to date.

17.16. The College uses its single central record to log:

- Everyone working or volunteering in the College each day, including any staff 'on loan'
- Details of any Risk Assessments carried out on staff and volunteers on loan from elsewhere

18. Young Adults Attending other Settings (other than the College)

18.1. Currently, this situation is unlikely to occur as a result of the very specialist needs of the young adults at Chadsgrove. However, should students be temporarily required to attend another setting, the College will make sure the receiving College is provided with any relevant welfare and safeguarding information.

18.2. Wherever possible, our DSL (DDSL) will share, as applicable:

- The reason(s) why the student is considered vulnerable and any arrangements in place to support them
- The student's EHC plan or individual Education Plan (IEP)
- Details of the student's Social Worker

- 18.3. Where the DSL or DDSL cannot share this information, the senior leader(s) identified in Section 7 will do this.
- 18.4. The College will share this information before the student arrives, as far as is possible, and otherwise as soon as possible afterwards.

19. Supporting Students should the College Partially or Fully Re-Open

- 19.1. The College will continue to be a safe space for all students to attend and flourish.
- 19.2. The Principal will ensure that appropriate staff are on site and that staff to student ratio numbers are appropriate, in order to maximise safety. She (or the Vice Principal) will also ensure that trained members of staff are available to administer medications and feed the students safely.
- 19.3. The College will ensure that, should the College care for the students of critical workers and vulnerable students on site, staff will ensure appropriate support is in place for them. This will be bespoke to each student and recorded on CPOMS as appropriate.
- 19.4. Any opening of College will need to be managed on a daily basis and will need to take into account the availability of
 - Trained staff to meet student needs
 - A DSL or DDSL
 - An appropriate number of first aiders
 - Sufficient resources that may be necessary to safely meet a students' needs whilst in College
- 19.5. Where the Principal deems it unsafe to open the College independently, she will discuss with the Directors, the College students and staff returning as part of the wider community alongside Chadsgrove School pupils.
- 19.6. In circumstances where a parent carer does not want to bring their son/daughter to an education setting, and their son/daughter is considered vulnerable, the Social Worker and the College will explore the reasons for this directly with the parent carer.
- 19.7. Where parent carers are concerned about the risk of their son/daughter contracting COVID-19, the College or the Social Worker will talk through these anxieties with the parent carer following the advice set out by Public Health England.

20. Social Distancing

- 20.1. All Staff and Students working in the College will be expected to observe any current Government Guidelines on social distancing.
- 20.2. Due to the very high levels of physical and intimate care that the majority of the students at the College require, often by two members of staff at the same time, it will be extremely difficult to maintain a two metre distance whilst on the premises.

21. Monitoring Arrangements

- 21.1. This Policy will be reviewed as guidance from the 3 local safeguarding partners, the LA or DfE is updated. At every review, it will be approved by the full Directors Board.

Appendix B – Designated Safeguarding Lead Roles and Responsibilities

Main purpose

The DSL will take lead responsibility for safeguarding across the College. They will take part in strategy discussions and inter-agency meetings, and contribute to the assessment of students. They will also advise and support other members of staff on student welfare and adult at risk protection matters as well as liaise with relevant agencies such as the local authority and Police.

The DSL will be required to safeguard and promote the welfare of students, and follow College policies and the Staff Code of Conduct at all times.

During term time, the DSL should always be available during College hours for staff in College to discuss any safeguarding concerns. Ideally this will be in person, but can also be via phone or video calling in exceptional circumstances.

Some of the safeguarding activities described below may be delegated to DDSLs, although the DSL will retain lead responsibility for the work of any DDSLs and will ensure it is completed to the highest standard.

Duties and Responsibilities

Alerting Manager / Managing Referrals

- Refer cases of suspected abuse to the Local Authority Adult Social Care
- Support staff who make referrals to local authority Adult Social Care
- Refer cases to the Channel Programme where there is a radicalisation concern
- Support staff who make referrals to the Channel Programme
- Refer cases to the Disclosure and Barring Service where a person is dismissed or left due to risk or harm to a student
- Refer cases where a crime may have been committed to the Police
- Keep detailed, accurate and secure written records of concerns and referrals. For students this will be on CPOMS and for staff, it will be within the staff member's individual file

Working with Staff and other Agencies

- Ensure all staff can access and understand the College's Safeguarding Policy and procedures
- Liaise with the Human Resources Case Manager and the Local Authority Designated Officer and Designated Safeguarding Adults Manager for adult at risk safeguarding concerns in all cases where a member of the College staff is involved
- Liaise with staff on matters of safety, safeguarding, and when deciding whether to make a referral
- Act as a source of support, advice and expertise for staff
- Arrange and attend a weekly Supervision Meeting with the DDSL
- Understand the assessment process for providing early help and intervention
- Have a good working knowledge of how Local Authorities conduct safeguarding concerns and reviews
- Attend and contribute to adult at risk meetings when required to do so

Training

- Undergo training (updated at least every two years) to develop and maintain the knowledge and skills required to carry out the role of DSL
- Undergo Prevent training and be able to:
 - Support the school in meeting the requirements of the Prevent duty
 - Provide advice and support to staff on protecting children from the risk of radicalisation
- Undergo training on female genital mutilation (FGM) and be able to:
 - Provide advice and support to staff on protecting and identifying children at risk of FGM
 - Report known cases of FGM to the Police, and help others to do so

- Refresh general safeguarding knowledge and skills at least annually so as to remain up to date with any developments relevant to the role
- Obtain access to relevant resources

Raise awareness

- Ensure the College’s safeguarding policies are known, understood and used appropriately
- Work with the Directors to ensure the College’s Safeguarding Policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly
- Ensure the Safeguarding Policy is available and easily accessible to everyone in the College community
- Ensure that parent carers are aware of, and can read, the Safeguarding Policy, and are aware that referrals about suspected abuse or neglect may be made, as well as the role of the College in this
- Link with Worcestershire Adult’s Safeguarding Board and make sure staff are aware of training opportunities and the latest local policies on safeguarding
- Be alert to the specific needs of the students at the College, particularly with regard to their Special Educational Needs and Disabilities and how these may impact upon them from a safeguarding perspective
- Encourage a culture of listening to students among all staff, ensuring that student’s feelings are heard at all times

Other Areas of Responsibility

- Where students leave the College, securely transfer their safeguarding file to their new setting as soon as possible, separately from the main student file
- Undertake safer recruitment training and support the College to follow best practice
- Monitor the single central record and ensure it complies with all relevant legislation
- Provide safeguarding reports to the Directors
- Model best practice and uphold the principles of confidentiality and data protection at all times

Please note that this list of duties is illustrative of the general nature and level of responsibility of the role. It is not a comprehensive list of all tasks that the DSL will carry out. The post holder may be required to do other duties appropriate to the level of the role.

Person specification

Criteria	Qualities
Qualifications and training	<ul style="list-style-type: none"> • GCSE (or equivalent) in English and Maths • Degree
Experience	<ul style="list-style-type: none"> • Successful leadership and management experience in a College or other relevant organisation • Experience of managing safeguarding in a College or other relevant organisation, including: <ul style="list-style-type: none"> ○ Building relationships with students and their parent carers ○ Working and communicating effectively with relevant agencies ○ Implementing and encouraging good safeguarding practice throughout a large team of people • Demonstrable evidence of developing and implementing strategies to help students and their families • Experience of handling large amounts of sensitive data and upholding the principles of confidentiality

Skills and knowledge	<ul style="list-style-type: none"> • Expert knowledge of legislation and guidance on safeguarding and working with young people, including knowledge of the responsibilities of Colleges and other Agencies • Ability to work with a range of people with the aim of ensuring the safety and welfare of students • Awareness of local and national agencies that provide support for adults at risk and their families • Excellent record keeping skills and attention to detail, in order to produce reports, take minutes of meetings, and document safeguarding concerns • Good IT skills, including previous use of CPOMS • Effective communication and interpersonal skills • Ability to communicate a vision and inspire others • Ability to build effective working relationships with staff and other stakeholders
Personal qualities	<ul style="list-style-type: none"> • Commitment to ensuring the safety and welfare of students • Uphold and promote the ethos and values of the College • Act with integrity, honesty, loyalty and fairness to safeguard the assets, financial integrity and reputation of the College • Ability to work under pressure and prioritise effectively • Maintain confidentiality at all times • Commitment to equality

Appendix C - Signs and Symptoms of Abuse

Recognition & Identification of Abuse

What is abuse?

Abuse and neglect are forms of maltreatment. Somebody may abuse or neglect an individual by inflicting harm, or by failing to act to prevent harm. Adults at risk may be abused in a family or in an institutional or community setting, by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse.

Indicators of Abuse

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

EMOTIONAL ABUSE

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

Emotional abuse is difficult to:

- define
- identify/recognise
- prove.

Emotional abuse is chronic and cumulative and has a long-term impact. Indicators may include:

- Physical, mental and emotional development lags
- Sudden speech disorders
- Continual self-deprecation ('I'm stupid, ugly, worthless, etc.')
- Overreaction to mistakes
- Extreme fear of any new situation
- Inappropriate response to pain ('I deserve this')
- Unusual physical behaviour (rocking, hair twisting, self-mutilation) - consider within the context of any form of disability such as autism
- Extremes of passivity or aggression
- Students suffering from emotional abuse may be withdrawn and emotionally flat. One reaction is for them to seek attention constantly or to be over-familiar. Lack of self-esteem and developmental delay are again likely to be present

NEGLECT

Neglect is the persistent failure to meet an individual's basic physical and/or psychological needs, likely to result in the serious impairment of their health or development. Neglect may involve a parent carer failing to provide adequate food, clothing and shelter (including exclusion from home or abandonment), failing to protect an individual from physical and emotional harm or danger, failure to ensure adequate supervision (including the use of inadequate care-givers) or failure to ensure access to appropriate medical care or treatment.

Neglect can often fit into various forms which are:

- Medical – the withholding of medical care including health and dental
- Emotional – lack of emotional warmth, touch and nurture

- Nutritional – either through lack of access to a proper diet which can affect their development
- Physical – failure to meet the individual's physical needs
- Lack of supervision and guidance – meaning the student is in dangerous situations without the ability to risk assess that danger

The College staff need to consider both acts of *commission* (where a carer deliberately neglects the adult at risk) and acts of *omission* (where a carer's failure to act is causing the neglect).

Many of the signs of neglect are visible. However, the College staff may not instinctively know how to recognise signs of neglect or know how to respond effectively when they suspect a student is being neglected. Students spend considerable time in the College so staff have opportunities to identify patterns over time and recognise and respond to concerns about their safety and welfare. All concerns should be recorded and reflected upon, not simply placed in a file.

Here are some signs of possible neglect:

Physical signs:

- Constant hunger
- Poor personal hygiene
- Constant tiredness
- Emaciation
- Untreated medical problems
- Poorly clothed, with inadequate protection from the weather
- Signs of malnutrition include wasted muscles and poor condition of skin and hair.
- Being too hot or too cold – red, swollen and cold hands and feet or they may be dressed in inappropriate clothing
- Consequences arising from situations of danger – accidents, assaults, poisoning
- Unusually severe but preventable physical conditions owing to lack of awareness of preventative health care or failure to treat minor conditions
- Health problems associated with lack of basic facilities such as heating
- Neglect can also include failure to care for the individual needs including any additional support the young person may need as a result of any disability

Behavioural signs:

- No social relationships
- Compulsive scavenging
- Destructive tendencies
- Absence for no apparent reason
- Difficult or challenging behaviour

PHYSICAL ABUSE

Physical abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, or otherwise causing physical harm to an individual. Physical harm may also be caused when a carer fabricates the symptoms of or deliberately induces illness.

When dealing with concerns regarding physical abuse, refer any suspected non-accidental injury to the Designated Safeguarding Lead without delay so that they are able to seek appropriate guidance from the police and/or social care in order to safeguard the adult at risk.

Staff must be alert to:

- Unexplained recurrent injuries or burns; improbable excuses or refusal to explain injuries;
- Injuries that are not consistent with the story: too many, too severe, wrong place or pattern

Physical signs:

- Bald patches
- Bruises, black eyes and broken
- Untreated or inadequately treated injuries
- Injuries to parts of the body where accidents are unlikely, such as thighs, back, abdomen
- Scalds and burns

- Bruising
- Bite marks may be evident from an impression of teeth
- Small circular burns on the skin suggest cigarette burns
- Scalding inflicted by immersion in hot water often affects buttocks or feet and legs symmetrically
- Red lines occur with ligature injuries

Behavioural signs:

- Wearing clothes to cover injuries, even in hot weather
- Refusal to undress
- Chronic running away
- Fear of medical help or examination
- Self-destructive tendencies
- Fear of physical contact - shrinking back if touched
- Admitting that they are punished, but the punishment is excessive
- Fear of suspected abuser being contacted
- Injuries that the individual cannot explain or explains unconvincingly
- Become sad, withdrawn or depressed
- Having trouble sleeping
- Behaving aggressively or be disruptive
- Showing fear of certain adults
- Having a lack of confidence and low self-esteem
- Using drugs or alcohol
- Repetitive pattern of attendance: recurrent visits, repeated injuries
- Excessive compliance
- Hyper-vigilance

SEXUAL ABUSE

Sexual Abuse involves forcing or enticing an individual to take part in sexual activities, not necessarily involving a high level of violence, whether or not he/she is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may include non-contact activities, such as involving adults at risk in looking at or in the production of, sexual images, watching sexual activities, encouraging adults at risk to behave in sexually inappropriate ways, or grooming in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse.

Characteristics of sexual abuse:

- It is usually planned and systematic – people do not sexually abuse adults at risk by accident, though sexual abuse can be opportunistic
- Grooming the individual – people who abuse adults at risk take care to choose a particular individual and often spend time making them dependent. This can be done in person or via the internet through chat-rooms and social networking sites
- Grooming the individual's environment – abusers try to ensure that potential adult protectors (carers) are not suspicious of their motives. Again, this can be done in person or via the internet through chat-rooms and social networking sites.

Behavioural changes may include:

- Being overly affectionate - desiring high levels of physical contact and signs of affection such as hugs and kisses
- Lack of trust or fear of someone they know well
- They may start using sexually explicit behaviour or language
- Extreme reactions, such as depression, self-mutilation, suicide attempts, running away, overdoses, anorexia
- Personality changes such as becoming insecure or clinging
- Sudden loss of appetite or compulsive eating
- Being isolated or withdrawn

- Inability to concentrate
- Become worried about clothing being removed
- Suddenly drawing sexually explicit pictures
- Trying to be 'ultra-good' or perfect; overreacting to criticism
- Genital discharge or urinary tract infections
- Marked changes in the young person's general behaviour. For example, they may become unusually quiet and withdrawn, or unusually aggressive. Or they may start suffering from what may seem to be physical ailments, but which can't be explained medically
- The young person may refuse to attend the College or start to have difficulty concentrating so that their work is affected
- They may show unexpected fear or distrust of a particular adult or refuse to continue with their usual social activities
- The young person may describe receiving special attention from a particular adult, or refer to a new, "secret" friendship with an adult or young person
- Adults at risk who have been sexually abused may demonstrate inappropriate sexualised knowledge and behaviour
- Low self-esteem, depression and self-harm are all associated with sexual abuse

Physical signs and symptoms for any age young person could be:

- Medical problems such as chronic itching, pain in the genitals, venereal diseases
- Stomach pains or discomfort walking or sitting
- Sexually transmitted infections
- Any features that suggest interference with the genitalia. These may include bruising, swelling, abrasions or tears
- Soreness, itching or unexplained bleeding from penis, vagina or anus
- Sexual abuse may lead to secondary enuresis or faecal soiling and retention
- Symptoms of a sexually transmitted disease such as vaginal discharge or genital warts, or pregnancy

Appendix D - Sexual Exploitation

Sexual exploitation is a form of abuse which involves individuals (male and female, of different ethnic origins and of different ages) receiving something in exchange for sexual activity.

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

Who is at risk?

Sexual exploitation can happen to any young person from any background. Although the research suggests that the females are more vulnerable, males are also victims of this type of abuse.

The characteristics common to all victims of sexual exploitation are not those of age, ethnicity or gender, rather their powerlessness and vulnerability. Victims often do not recognise that they are being exploited because they will have been groomed by their abuser(s). As a result, victims do not make informed choices to enter into, or remain involved in, sexually exploitative situations but do so from coercion, enticement, manipulation or fear. Sexual exploitation can happen face to face and it can happen online. It can also occur between adults at risk.

WARNING SIGNS AND VULNERABILITIES CHECKLIST

The evidence available points to several factors that can increase an individual's vulnerability to being sexually exploited:

- Living in a chaotic or dysfunctional household
- History of abuse
- Recent bereavement or loss
- Gang association either through relatives, peers or intimate relationships
- Attending settings with individuals who are sexually exploited
- Learning disabilities
- Unsure about their sexual orientation or unable to disclose sexual orientation to their families
- Friends with other individuals who are sexually exploited
- Homeless
- Lacking friends from the same age group
- Living in a gang neighbourhood
- Living in residential care
- Living in hostel, bed and breakfast accommodation
- Low self-esteem or self-confidence

The following signs and behaviour are generally seen in adults at risk who are **already being sexually exploited**:

- Missing from home
- Physical injuries
- Drug or alcohol misuse
- Involvement in offending
- Repeat sexually-transmitted infections, pregnancy and terminations
- Absent from college
- Evidence of sexual bullying and/or vulnerability through the internet and/or social networking sites
- Estranged from their family
- Receipt of gifts from unknown sources
- Recruiting others into exploitative situations
- Poor mental health
- Self-harm
- Thoughts of or attempts at suicide

Evidence shows that any individual displaying several vulnerabilities from the above lists should be considered to be at high risk of sexual exploitation.

The DSL must ensure that all staff are aware of signs and symptoms of sexual exploitation and know that these must be reported and recorded as safeguarding concerns.

Appendix E –Criminal Exploitation/County Lines

CE is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a person into any criminal activity:

- In exchange for something the victim needs or wants and/or
- For the financial or other advantage of the perpetrator or facilitator and/or
- Through violence or the threat of violence.

The victim may have been criminally exploited even if the activity appears consensual.

CE does not always involve physical contact; it can also occur through the use of technology.

CE can include the person being forced to work in cannabis factories, being coerced into moving drugs or money across the country, forced to shoplift or pickpocket, or to threaten other young people.

Some of the following can be indicators of CE:

- Unexplained gifts or new possessions
- Association with other young people involved in exploitation
- Changes in emotional well-being
- Misuse of drugs and alcohol
- Missing for periods of time or regularly come home late
- Regularly miss or do not take part in education

Exploitation is an integral part of the County Lines Offending Model with children and adults at risk 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. Adults at risk 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.

Vulnerable young adults 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. People 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 education), when the victim may have been trafficked for the purpose of transporting drugs

If a person 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. A referral to the National Referral Mechanism should also be considered.

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

Appendix F - Effects of Domestic Abuse on Adults at Risk

The impact of domestic abuse on the quality of an individual's life is very significant. Adults at risk who live with domestic abuse are at increased risk of behavioural problems, emotional trauma and mental health difficulties.

The impact of domestic abuse on adults at risk can be wide-ranging and may include effects in any or all of the following areas:

Physical

Individuals 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 individuals 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, adults at risk may sometimes be forced to watch the sexual abuse of their carer. This can have long-lasting effects on the sexual and emotional development of the individual.

Economic

The carer of the adult at risk may have limited control over the family finances. Therefore, there might be little or no money available for social activities, clothing or even food, impacting on their health and development.

Emotional

Individuals will often be very confused about their feelings. They may be given negative messages about their own worth, which may lead to them developing low self-esteem. Many individuals 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 individuals may internalise feelings and appear passive and withdrawn or externalise their feelings in a disruptive manner.

Isolation

Individuals 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 have to move away from existing friends and family, for example, into a refuge or other safe or temporary accommodation.

Threats

Individuals are likely to have heard threats to harm their carer. 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.

What you might see in the College

- Unexplained absences
- Students attending the College when ill rather than staying at home
- Students who are constantly tired, on edge and unable to concentrate through disturbed sleep or worrying about what is happening at home
- Students displaying difficulties in their cognitive and educational performance
- Students whose behaviour and personality changes dramatically
- Students who become quiet and withdrawn and have difficulty in developing positive peer relations
- Students displaying disruptive behaviour or acting out violent thoughts with little empathy for victims
- Students 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 the College can do

The College 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. It would help if educational trusts displayed posters or had cards/pens available with information about domestic abuse and contact details for useful agencies:

- Worcestershire's Forum Against Domestic Abuse and Sexual Violence (WFADSA) and West Mercia Women's Aid 24 hr. helpline: **0800 980 3331**
- Website: <http://www.worcestershire.gov.uk/cms/domestic-and-sexual-abuse.aspx>
- West Mercia Constabulary - Police Domestic Abuse Units 101.

Research shows that the repeated use of physical, sexual, psychological and financial abuse is one of the ways in which power is used exert control over others. The underlying attitudes which legitimise and perpetuate such violence should be challenged by educational trusts as part of the whole educational trust ethos.

The College can support individual adults at risk by:

- Introducing a **Whole-College philosophy** that domestic abuse is unacceptable
- **Responding to disclosures** and potential safeguarding concerns
- **Giving emotional support** – the individual might need referral to a more specialist service or need additional support
- **Facilitating a peer support network** – students can become isolated but often welcome talking to friends about their problems
- **Offering practical support**
- **Providing somewhere safe and quiet**
- **Improving the self-esteem and confidence** of students 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 educational trust lives
 - Involving them in decision making
 - Helping them to be more assertive
 - Respecting them as individuals
 - Encouraging involvement in extra-curricular activities

(From the Expect Respectful Education Toolkit – Women's Aid)

Appendix G –Female Genital Mutilation (FGM)

Female Genital Mutilation (FGM) – a form of Human Rights Abuse

What is FGM?

FGM includes procedures that intentionally alter or injure the female genital organs for non-medical reasons.

There are four known types of FGM, all of which have been found in the UK:

Type 1 – clitoridectomy: partial or total removal of the clitoris and, in very rare cases, only the prepuce (the fold of skin surrounding the clitoris)

Type 2 – excision: partial or total removal of the clitoris and the labia minora, with or without excision of the labia majora (the labia are the ‘lips’ that surround the vagina)

Type 3 – infibulation: narrowing of the vaginal opening through the creation of a covering seal. The seal is formed by cutting and repositioning the inner, or outer, labia, with or without removal of the clitoris

Type 4 – other: all other harmful procedures to the female genitalia for non-medical purposes, e.g., pricking, piercing, incising, scraping and cauterising the genital area.

FGM is sometimes known as ‘female genital cutting’ or female circumcision. Communities tend to use local names for this practice, including ‘sunna’.

Why is FGM carried out?

It is believed that:

- It brings status and respect to the girl and that it gives a girl social acceptance, especially for marriage
- It preserves a girl’s virginity/chastity
- It is part of being a woman as a rite of passage
- It upholds the family honour
- It cleanses and purifies the girl
- It gives the girl and her family a sense of belonging to the community
- It fulfils a religious requirement believed to exist
- It perpetuates a custom/tradition
- It helps girls and women to be clean and hygienic
- It is cosmetically desirable
- It is mistakenly believed to make childbirth safer

Religion is sometimes given as a justification for FGM. For example, some people from Muslim communities argue that the Sunna (traditions or practices undertaken or approved by the prophet Mohammed) recommends that women undergo FGM, and some women have been told that having FGM will make them ‘a better Muslim’. However, senior Muslim clerics at an international conference on FGM in Egypt in 2006 pronounced that FGM is not Islamic, and the London Central Mosque has spoken out against FGM on the grounds that it constitutes doing harm to oneself or to others, which is forbidden by Islam.

Within which communities is FGM known to be practised?

According to the Home Office it is estimated that up to 24,000 girls under the age of 15 are at risk of FGM. UK communities that are most at risk of FGM include Kenyan, Somali, Sudanese, Sierra Leone, Egyptian, Nigerian and Eritrean, as well as non-African communities including Yemeni, Afghani, Kurdish, Indonesian and Pakistani.

Obviously, this not to say that all families from the communities listed above practise FGM, and many parent carers will refuse to have their daughters subjected to this procedure. However, in some communities a great deal of pressure can be put on parent carers to follow what is seen as a cultural or religious practice.

Is FGM harmful?

FGM is extremely harmful and is often described as brutal because of the way it is carried out, and its short and long term effects on physical and psychological health.

FGM is carried out on children between the ages of 0 and 15, depending on the community in which they live. It is often carried out without any form of sedation and without sterile conditions. The girl or young woman is held down while the procedure of cutting takes place and survivors describe extreme pain, fear and feelings of abandonment.

Where the vagina is cut and then sewn up, only a very small opening may be left. This is often seen as a way to ensure that when the girl enters marriage, she is a virgin. In some communities the mother of the future husband and the girl's own mother will take the girl to be cut open before the wedding night. Repeat urinary tract infections are a common problem for women who have undergone FGM, and for some, infections come from menstruation being restricted. Many women have problems during pregnancy and childbirth. The removal of the clitoris denies women physical pleasure during sexual activity and some groups will practise complete removal to ensure chastity.

Is it illegal?

FGM is internationally recognised as a violation of the human rights of girls and women, and is illegal in most countries – including the UK. The Female Genital Mutilation Act 2003 came into force in 2004: The act makes it illegal to:

- practise FGM in the UK
- take girls who are British nationals or permanent residents of the UK abroad for FGM, whether or not it is lawful in that country
- Aid and abet, counsel or procure the carrying out of FGM abroad.

The offence carries a penalty of up to 14 years in prison, and/or a fine.

Signs, Symptoms and Indicators

The following list of possible signs and indicators are not diagnostic, but are offered as a guide as to what kind of things should alert professionals to the possibility of FGM.

Things that may point to FGM happening:

- A young person talking about getting ready for a special ceremony
- A family arranging a long break abroad
- A young person's family being from one of the 'at-risk' communities for FGM (see above)
- Knowledge that an older sibling has undergone FGM
- A young person talks of going abroad to be 'cut', or get ready for marriage.

Things that may indicate a young person has undergone FGM:

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

It is important to keep in mind that the parent carers may not see FGM or Breast Ironing as a form of abuse; however, they may be under a great deal of pressure from their community and or family to subject their daughters to it. Some parent carers from identified communities may seek advice and support as to how to resist and prevent FGM for their daughters, and education about the harmful effects of FGM and Breast Ironing may help to make parent carers feel stronger in resisting the pressure of others in the community. Remember that religious teaching does not support FGM or Breast Ironing.

The 'one chance' rule

In the same way that we talk about the 'one chance rule' in respect of young people coming forward with fears that they may be forced into marriage, young people disclosing fears that they are going to be sent abroad for FGM are taking the 'one chance', of seeking help.

It is essential that we take such concerns seriously and act without delay. Never underestimate the determination of parent carers who have decided that it is right for their daughter to undergo FGM. Attempts to mediate may place the child/young person at greater risk, and the family may feel so threatened at the news of their child's disclosure that they bring forward their plans or take action to silence her.

Mandatory Reporting Duty

Where FGM has taken place, since 31 October 2015 there has been a mandatory reporting duty placed on teachers. 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 in England and Wales, to personally report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Those failing to report such cases will face disciplinary sanctions. Further information on when and how to make a report can be found in the following Home Office guidance: '[Mandatory Reporting of Female Genital Mutilation - procedural information](#)' (October 2015).

The following is a useful summary of the FGM mandatory reporting duty: [FGM Fact Sheet](#).

Appendix H – Forced Marriage

Forced Marriage is a form of Domestic Abuse and a crime in England and Wales

Forced Marriage should be recognised as a human rights abuse – and should always invoke adult at risk protection procedures within the College.

A forced marriage is one entered into without the full and free consent of one or both parties, and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. 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.

A forced marriage is not the same as an arranged marriage – in an arranged marriage the families take a leading role in choosing the marriage partner. The marriage is entered into freely by both people.

Warning signs

Warning signs can include a sudden drop in performance, absence and conflicts with Parent Carers over continuation of the student's education.

There may be excessive parental restrictions and control, a history of domestic abuse within the family, or extended absence through sickness or overseas commitments. Students may also show signs of depression or self-harming, and there may be a history of older siblings leaving education early to get married.

The justifications

Most cases of forced marriage in the UK involve South Asian families. This is partially a reflection of the fact that there is a large established South Asian population in the UK. It is clear, however, that forced marriage is not a solely South Asian phenomenon — there have been cases involving families from East Asia, the Middle East, Europe and Africa.

Some forced marriages take place in the UK with no overseas element, while others involve a partner coming from overseas, or a British citizen being sent abroad. Parent carers who force adults at risk to marry often justify it as protecting them, building stronger families and preserving cultural or religious traditions. They may not see it as wrong.

Forced marriage can never be justified on religious grounds: every major faith condemns it and freely given consent is a pre-requisite of Christian, Jewish, Hindu, Muslim and Sikh marriage.

Culture

Often, parent carers believe that they are upholding the cultural traditions of their home countries, when in fact practices and values there have changed. Some parent carers come under significant pressure from their extended families to get their sons/daughters married.

The law

Although there is no specific criminal offence of 'forcing someone to marry' within England and Wales, forced marriage may involve criminal offences. Perpetrators, usually parent carers or family members, could be prosecuted for offences including threatening behaviour, assault, kidnap, abduction, imprisonment and, in the worse cases, murder.

Sexual intercourse without consent is rape, regardless of whether this occurs within the confines of a marriage. A girl who is forced into marriage is likely to be raped and may be raped until she becomes pregnant.

What to do if a student seeks help

- The student should be seen immediately in a private place, where the conversation cannot be overheard.
- The student should be seen on her own, even if she attends with others.
- Develop a safety plan in case the student is seen i.e. prepare another reason why you are meeting.
- Explain all options to the student and recognise and respect her wishes. If the student does not want to be referred to social care, you will need to consider whether to respect the student's

wishes — or whether the student's safety requires further action to be taken. If you take action against the student's wishes you must inform them.

- Establish whether there is a family history of forced marriage, for example, siblings forced to marry
- Advise the student not to travel overseas and discuss the difficulties she may face
- Seek advice from the Forced Marriage Unit
- Liaise with Police and Social Care to establish if any incidents concerning the family have been reported
- Refer to the local police if there is any suspicion that there has been a crime or that one may be committed
- Refer the student, with their consent, to the appropriate local and national support groups, and counselling services

What to do if the student is going abroad imminently

The Forced Marriage Unit advises education professionals to gather the following information if at all possible — it will help the unit to locate the student and to repatriate them:

- A photocopy of the student's passport for retention — encourage the student to keep details of their passport number and the place and date of issue
- As much information as possible about the family (this may need to be gathered discretely)
- Full name and date of birth of the student under threat
- Student's father's name
- Any addresses where the student may be staying overseas
- Potential spouse's name
- Date of the proposed wedding
- The name of the potential spouse's father if known
- Addresses of the extended family in the UK and overseas

Specific information

It is also useful to take information that only the student would know, as this may be helpful during any interview at an embassy or British High Commission — in case another person of the same age is produced pretending to be the student.

Professionals should also take details of any travel plans and people likely to accompany the student. Note also the names and addresses of any close relatives remaining in the UK and a safe means to contact the student — a secret mobile telephone, for example, that will function abroad.

Forced marriage: what educators should not do?

- Treat such allegations merely as domestic issues and send the student back to the family home
- Ignore what the student has told you or dismiss the need for immediate protection
- Approach the student's family or those with influence within the community, without the express consent of the student, as this will alert them to your concern and may place the student in danger
- Contact the family in advance of any enquires by the Police, Social Care or the Forced Marriage Unit, either by telephone or letter
- Share information outside young person protection information sharing protocols without the express consent of the student
- Breach confidentiality except where necessary in order to ensure the student's safety
- Attempt to be a mediator

Colleges can play an important role in safeguarding against forced marriage. The Forced Marriage Unit has published statutory guidance and Multi-agency guidelines, pages 35-36 of which focus on the role of schools and colleges.

Further guidance is available from The Forced Marriage Unit:

Tel: (+44) (0)20 7008 0151 between 9.00 a.m. and 5.00 p.m. Monday to Friday

Emergency Duty Officer (out of hours): (+44) (0)20 7008 1500

E-mail: fm@fco.gov.uk **Website:** www.fco.gov.uk/forcedmarriage

FMU publication: '*Multi-Agency Practice Guidelines: Handling Cases of Forced Marriage*' June 09

See also: *'The Right to Choose – Multi-Agency Guidance in relation to Forced Marriage'* Government Office - November 2008, West Mercia regional procedures and Forced Marriage Guidance on the WSCB website – January 2016.

Appendix I - Radicalisation and Extremism

The Prevent Duty

The Prevent duty should be seen as part of schools' and colleges' wider safeguarding obligations. DSLs and other senior leaders should familiarise themselves with the revised Prevent Duty guidance: for England and Wales. The guidance is set out in terms of four general themes: risk assessment, working in partnership, staff training, and IT policies.

Preventing Radicalisation

Adults at risk are vulnerable to extremist ideology and radicalisation. Similar to protecting individuals from other forms of harms and abuse, protecting them from this risk should be a part of the College's safeguarding approach.

Extremism is the vocal or active opposition to our fundamental values, including the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces.

Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.

What is Prevent?

Prevent is the Government's strategy to stop people becoming terrorists or supporting terrorism, in all its forms. Prevent works at the pre-criminal stage by using early intervention to encourage individuals and communities to challenge extremist and terrorist ideology and behaviour.

The Counter-Terrorism and Security Act (2015), places a duty on specified authorities, including colleges, to have due regard to the need to prevent people from being drawn into terrorism ("the Prevent duty"). The Prevent duty reinforces existing duties placed upon educational establishments for keeping individuals safe by:

- Ensuring a broad and balanced curriculum is in place to promote the spiritual, moral, social and cultural development of students
- Assessing the risk of adults at risk being drawn into extremist views
- Ensuring safeguarding arrangements by working in partnership with local authorities, police and communities;
- Training staff to provide them with the knowledge and ability to identify adults at risk at risk
- Keeping students safe online, using effective filtering and usage policies

Warning Signs/Indicators of Concern

There is no such thing as a "typical extremist": those who become involved in extremist actions come from a range of backgrounds and experiences, and most individuals, even those who hold radical views, do not become involved in violent extremist activity.

There is no single way of identifying whether a young adult is likely to be susceptible to an extremist ideology. Background factors combined with specific influences such as family and friends may contribute to vulnerability. Similarly, radicalisation can occur through many different methods (such as social media or the internet) and settings (such as within the home).

However, it is possible to protect vulnerable people from extremist ideology and intervene to prevent those at risk of radicalisation being radicalised. As with other safeguarding risks, staff should be alert to changes in behaviour, which could indicate that they may be in need of help or protection.

Adults at risk may become susceptible to radicalisation through a range of social, personal and environmental factors. It is vital that College staff are able to recognise those vulnerabilities. However, this list is not exhaustive, nor does it mean that all adults at risk experiencing the above are at risk of radicalisation for the purposes of violent extremism.

Factors which may make students more vulnerable may include:

- **Identity Crisis:** the individual is distanced from their cultural/religious heritage and experiences discomfort about their place in society

- **Personal Crisis:** the individual may be experiencing family tensions; a sense of isolation; low self-esteem; they may have dissociated from their existing friendship group and become involved with a new and different group of friends; they may be searching for answers to questions about identity, faith and belonging
- **Personal Circumstances:** migration; local community tensions and events affecting the individual's country or region of origin may contribute to a sense of grievance that is triggered by personal experience of racism or discrimination or aspects of Government policy
- **Unmet Aspirations:** the individual may have perceptions of injustice; a feeling of failure; rejection of civic life
- **Experiences of Criminality:** involvement with criminal groups, imprisonment, poor resettlement or reintegration
- **Special Educational Need:** adults at risk may experience difficulties with social interaction, empathy with others, understanding the consequences of their actions and awareness of the motivations of others

Students who are vulnerable to radicalisation may also be experiencing:

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

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

- Being in contact with extremist recruiters and/or spending increasing time in the company of other suspected extremists
- Loss of interest in other friends and activities not associated with the extremist ideology, group or cause
- Accessing extremist material online, including through social networking sites
- Possessing or accessing materials or symbols associated with an extremist cause
- Using extremist narratives and a global ideology to explain personal disadvantage
- Voicing opinions drawn from extremist ideologies and narratives, this may include justifying the use of violence to solve societal issues
- Graffiti symbols, writing or art work promoting extremist messages or images
- Significant changes to appearance and/or behaviour increasingly Colleges on an extremist ideology, group or cause;
- Changing their style of dress or personal appearance to accord with the group;
- Attempts to recruit others to the group/cause
- Using insulting to derogatory names for another group
- Increase in prejudice-related incidents committed by that person – these may include:
 - Physical or verbal assault
 - Provocative behaviour
 - Damage to property
 - Derogatory name calling
 - Possession of prejudice-related materials
 - prejudice related ridicule or name calling
 - Inappropriate forms of address
 - Refusal to co-operate
 - Attempts to recruit to prejudice-related organisations
 - condoning or supporting violence towards others

Referral Process

All concerns about students vulnerable to radicalisation should be referred to the SPOC in the first instance. The SPOC will follow safeguarding procedures including:

- Talking to the individual about their behaviour/views/on-line activity/friends etc.
- Discussion with parent carers about the concerns

- Checking out on-line activity, including social media if possible
- Providing in-house support, if available

If concerns persist, then the SPOC should complete the Channel Referral Form normally with the knowledge and consent of the individual.

The referral will then be subject to a triage process to decide whether or not it meets the threshold for a referral to Channel. If it does, the SPOC should be prepared to attend the Channel Panel meeting to share the concerns and help identify any intervention required. Further feedback to the Channel Panel will be expected following intervention to decide whether there are still concerns.

Additional Guidance

Guidance on Channel is available at: Channel guidance.

The Home Office has developed three e-learning modules:

- Prevent awareness e-learning offers an introduction to the Prevent duty
- Prevent referrals e-learning supports staff to make Prevent referrals that are robust, informed and with good intention
- Channel awareness e-learning is aimed at staff who may be asked to contribute to or sit on a multi-agency Channel panel

Educate Against Hate, is a government website designed to support teachers, tutors and leaders to help them safeguard their students from radicalisation and extremism. The platform provides free information and resources to help College staff identify and address the risks, as well as build resilience to radicalisation.

The ETF Online Learning environment provides online training modules for practitioners, leaders and managers, support staff and governors/Board members outlining their roles and responsibilities under the duty.

Government's Counter Extremism Strategy, <https://www.gov.uk/government/publications/counter-extremism-strategy>.

Revised Prevent Duty Guidance for England and Wales, <https://www.gov.uk/government/publications/prevent-duty-guidance/revised-prevent-duty-guidance-for-england-and-wales>.

The Terrorism Act 2000 (TACT 2000), <http://www.legislation.gov.uk/ukpga/2000/11/contents>

Appendix J – Peer on Peer Abuse, Sexual Violence and Sexual Harassment

Peer on peer abuse can take many forms. It is most likely to include, but may not be limited to:

- Bullying (including cyberbullying, prejudice-based and discriminatory bullying)
- Abuse in intimate personal relationships between peers
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
- Sexual violence, such as rape, assault by penetration and sexual assault;(this may include an online element which facilitates, threatens and/or encourages sexual violence)
- Sexual harassment, such as sexual comments, remarks, jokes, physical behaviour such as deliberately brushing against someone and online sexual harassment. This behaviour may be standalone or part of a broader pattern of abuse. Sexual harassment is likely to violate a child's dignity, and/or make them feel intimidated, degraded, or humiliated and/or create a hostile, offensive or sexualised environment
- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- Consensual and non-consensual sharing of nudes and semi nudes' images and or videos (also known as sexting or youth produced sexual imagery)
- Upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm The Voyeurism (Offences) Act, which is commonly known as the Upskirting Act, came into force on 12 April 2019. It is a criminal offence and anyone of any gender, can be a victim.
- Initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element)

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

Young adults who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and offline (both physical and verbal) and are never acceptable. It is important that all victims are taken seriously and offered appropriate support. Staff should be aware that some groups are potentially more at risk. Evidence shows females, young adults with SEND and LGBT individuals are at greater risk.

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

Sexual Harassment

When referring to sexual harassment we mean 'unwanted conduct of a sexual nature' that can occur online and offline. When we reference sexual harassment, we do so in the context of young adult on young adult sexual harassment. Sexual harassment is likely to: violate an individual's dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment.

When referring to sexual violence, the College is referring to sexual violence offences under the Sexual Offences Act 2003 as described below:

- **Rape:** A person (A) commits an offence of rape if: he intentionally penetrates the vagina, anus or mouth of another person (B) with his penis, B does not consent to the penetration and A does not reasonably believe that B consents.
- **Assault by Penetration:** A person (A) commits an offence if: s/he intentionally penetrates the vagina or anus of another person (B) with a part of her/his body or anything else, the penetration is sexual, B does not consent to the penetration and A does not reasonably believe that B consents.
- **Sexual Assault:** A person (A) commits an offence of sexual assault if: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents.
- **Consent:** Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another, e.g. to vaginal but not anal sex or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity and each time activity occurs. Someone consents to vaginal, anal or oral penetration only if s/he agrees by choice to that penetration and has the freedom and capacity to make that choice.

Whilst not intended to be an exhaustive list, sexual harassment can include:

- Sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names
- Sexual “jokes” or taunting
- Physical behaviour, such as: deliberately brushing against someone, interfering with someone’s clothes (schools and colleges should be considering when any of this crosses a line into sexual violence - it is important to talk to and consider the experience of the victim) and displaying pictures, photos or drawings of a sexual nature
- Online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence
- Innon-consensual sharing of sexual images and videos;
- Sexualised online bullying;
- Unwanted sexual comments and messages, including, on social media;
- Sexual exploitation; coercion and threats; and up skirting.

The response to a report of sexual violence or sexual harassment.

The initial response to a report from a student is important. 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.

If staff have a concern about a student or a student makes a report to them, they should follow the referral process. As is always the case, if staff are in any doubt as to what to do they should speak to the DSL or (or a DDSL).

Additional advice and support

- What to do if you're worried a child/young person is being abused – DfE advice
- Domestic abuse: Various Information/Guidance - Home Office (HO)
- Faith based abuse: National Action Plan - DfE advice
- Relationship abuse: disrespect nobody - Home Office website

Appendix K - Students with a Disability

Some students, because of their learning and/or physical disability, are vulnerable and may find it more difficult to recognise and report abuse.

Their disability may mean that:

- Their life experiences are limited, creating difficulty recognising inappropriate behaviour
- They are afraid of challenging people, concerned that they will anger an authority figure or get into trouble
- Communication difficulties make it hard to report abuse
- They may not be able physically to leave an abusive situation
- They receive intimate physical care and, therefore, the abuse may seem 'normal'
- Their self-esteem and self-image are poor
- They might not be aware to whom they can report abuse
- Authority figures are unwilling to believe that anyone would abuse a disabled young person

The College must take particular care, therefore, when working with students with disabilities.

Appendix L - Online Safety

The use of technology has become a significant component of many safeguarding issues, for example, sexual exploitation, radicalisation and sexual predation. Technology often provides the platform that facilitates harm.

An effective approach to online safety empowers the College to protect and educate the whole 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 four areas of risk:

- **Content** - being exposed to illegal, inappropriate or harmful content, for example: pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism
- **Contact** - being subjected to harmful online interaction with other users; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes'
- **Conduct** - personal online 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

Education

Opportunities to teach safeguarding, including online safety include:

- **Be Internet Legends** developed by Parent Zone and Google is a free internet safety curriculum with PSHE accredited lesson plans and teaching resources
- **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 and to be central to a whole school or college approach to safeguarding and online safety
- **PSHE association** provides guidance 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 online safety

Protecting Young Adults

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

Whilst considering their responsibility to safeguard and promote the welfare of students, and provide them with a safe environment in which to learn, Directors should consider the age range of their students, the number of students, how often they access the IT system and the proportionality of costs **versus** 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.

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

Whilst it is essential that Directors 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.

Reviewing Online Safety

Technology in this area evolves and changes rapidly. 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’.

Staff Training

Directors should ensure that, as part of the requirement for staff to undergo regularly updated safeguarding training and the requirement to ensure students 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 parent carers to keep children and young adults safe online.

The following list is not exhaustive but should provide a useful starting point:

Advice for Directors and Senior Leaders

- **Childnet** provide guidance on cyberbullying
- **Educateagainsthate** provides practical advice and support on protecting individuals from extremism and radicalisation
- **London Grid for Learning** provides advice on all aspects of 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
- **South West Grid for Learning** provides advice on all aspects of online safety arrangements
- **Use of social media for online radicalisation** - A briefing note on how social media is used to encourage travel to Syria and Iraq
- **UK Council for Internet Safety** have provided advice on sexting-
- **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 and Young Adults

- **Childline** for free and confidential advice
- **CEOP** for advice on making a report about online abuse

Parent Carer Support

- **Childnet** offers a toolkit to support parent carers 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
- **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 parent carers to keep individuals safe from online radicalisation

- **Lucy Faithfull Foundation** StopItNow resource can be used by parent carers who are concerned about someone's behaviour, including individuals who may be displaying concerning sexual behaviour (not just online)
- **National Crime Agency/CEOP Thinkuknow** provides support for parent carers to keep their children safe online
- **Net-aware** provides support for parent carers from the NSPCC and O2, including a guide to social networks, apps and games
- **Parentzone** provides help for parent carers on how to keep their children safe online
- **UK Safer Internet Centre** provide tips, advice, guides and other resources to help keep individuals safe online



**Appendix M -
CHADSGROVE EDUCATIONAL TRUST SPECIALIST COLLEGE**
**Checklist for handling and recording allegations or complaints made against a member of staff or
volunteer**

- 1.** Name and position of member of staff who is subject of allegation/complaint:
.....
- 2.** Is the complaint written or verbal?
- 3.** Complaint made by: Relationship to young person:
- 4.** Name of young person:..... Age and DOB.....
- 5.** Parent Carer's name and address:
.....
.....
- 6.** Date of alleged incident/s:
- 7.** Did the young person attend on this/these dates?
- 8.** Nature of the complaint (continue on a separate sheet if necessary):.....
.....
.....
.....
.....
.....
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.....
.....
- 9.** Other relevant information:.....
.....
.....
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.....
.....
- 10.** LADO/DASM contacted: Yes Date: No
- 11.** In no, reason why not

.....

12. Further actions advised by Senior Adviser/LADO/DASM:

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.....

Checklist	Yes	No
• Do you have details (either a written account or notes from a verbal account) of the alleged incident, signed and dated?		
• Have you checked the incident could actually have taken place (I.e. was the young person in the lesson; was the member of staff teaching the lesson that day)?		
• Is there evidence of significant harm – e.g. a visible injury?		
• Has a criminal offence taken place – e.g. has excessive force been used, that could be classed as an assault?		
• Has the incident been reported to anyone else – e.g. the Police?		
• Were there any witnesses to the incident – if so have you made a note of names?		
• Are parent carers aware of the allegation?		
• Is the member of staff aware of the allegation?		
• Have you reported the allegation to the LADO/DASM (01905 846221)?		

Remember, do not attempt to investigate the allegation yourself.

Your name and position:

Signature:..... **Date:**



CHADSGROVE EDUCATIONAL TRUST SPECIALIST COLLEGE

Appendix N Transfer of Records

**Student Safeguarding Record
Transfer Receipt**

Student's Name	
Date of Birth	
Home Address	
Receiving Educational Setting	
Address	
<p>I confirm transfer of young person safeguarding records in respect of the above named student and that a copy of all Chadsgrove Educational Trust based documents has been retained by Chadsgrove Educational Trust</p> <p>Signed on behalf of Chadsgrove Educational Trust Specialist College</p> <p>Print Name:</p> <p>Date:</p>	
<p>I confirm receipt of young person protection records in respect of the above named young person</p> <p>Signed on behalf of receiving setting:</p> <p>Print name:</p> <p>Date:</p>	
<p>Please copy and retain the original at Chadsgrove Educational Trust Specialist College</p>	