Chadsgrove Educational Trust Specialist College

Safeguarding Policy and Guidance September 2024 (V5)

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Author: Bec Gayden in consultation with all Directors

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Safeguarding Policy – Contents

IMPORTANT CONTACTS

ROLE	NAME	CONTACT DETAILS
- Directors' Committee Responsible for Safeguarding	Full Directors Board	Contact via College Office 01527 871511
- Principal - Designated Safeguarding Lead (DSL)	Deb Rattley	drattley@chadsgrove.worcs.sch.uk 01527 871511 / 07791 612049
- Vice Principal - Deputy Designated Safeguarding Lead (DDSL) - GET SAFE lead - Prevent Lead - Online Safety Co-ordinator - Designated Tutor for Adults in Local Authority Care	Bec Gayden	rgayden@chadsgrove.worcs.sch.uk 01527 871511 / 07948 349584
- Assistant Safeguarding Leads	Leigh Blakeman Angela Macvie (Chadsgrove School)	ljb165@chadsgrove.worcs.sch.uk amacvie@chadsgrove.worcs.sch.uk <u>01527 871511 / 07922 424866</u>
- Chair of Directors - Safeguarding Director	Franki Williams	fw.sendconsultancy@gmail.com Contact via College Office 01527 871511
- Vice Chair of Directors	Roger Dill-Russell	rogerdillr@btinternet.com or contact via College Office
- Safeguarding in Education Advisor, WCF	Ms Denise Hannibal	dhannibal@worcschildrenfirst.org.uk 01905 844436 07825 531295
- Worcestershire Adult Safeguarding Team	This number is for safeguarding advice not referrals	01905 843189
- Local Authority Designated Officer (LADO)		01905 846221
- Channel Helpline		020 7340 7264
For Professionals to report a safeguarding concern go to: **[Worcestershire County Council Report a Safeguarding Concern about an Adult](#)**		

1. **Introduction**
    1.1   Our mission is to create a place where students thrive; maximising both their physical and emotional health in an environment where they feel, safe, happy and confident to learn; fostering life skills, communication and independence to enable them to have an active voice and become more independent in adulthood.

    1.2   Chadsgrove 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.

    1.3   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.

    1.4   Safeguarding is the responsibility of everyone and this policy applies to all individuals who come into contact with the students including, but not limited to, Staff, Directors, Volunteers, Students and Visitors. It also applies to individuals who work on behalf of the College. This policy and the Colleges procedures also apply to off-site activities.

    1.5   Safeguarding students 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 the GET SAFE agenda

    1.6   All students attending the College are adults at risk and have an EHC Plan that has been issued by their Local Authority.

    1.7   The College is on the site of Chadsgrove School and students 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 students and the staff working at the College.

    1.8   The Directors ensure a whole College approach to safeguarding is in place. This means ensuring safeguarding and the protection of students are at the forefront and underpin all relevant aspects of process and policy development.

    1.9 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

2. Aims

2.1 The College aims to ensure that:
- It creates an open, honest, caring and supportive environment for all students
- Appropriate action is taken in a timely manner to safeguard and promote student's welfare
- All staff are aware of their statutory responsibilities with respect to safeguarding
- Staff are properly trained in recognising and reporting safeguarding issues Appendix A-M
- All staff and volunteers feel able to raise concerns about poor or unsafe practice and are aware of whistleblowing procedures and helplines
- It operates safer recruitment practices at all times

3. Legislation and Statutory Guidance

3.1 This policy is based on the Department for Education's (DfE's) statutory guidance Keeping Children safe in Education (2024) and Working Together to Safeguard Children 2023 and the Governance Handbook

3.2 This policy is also based on the following legislation:
- Advice to schools and colleges on gangs and youth violence
- Multi-agency policy & procedures for the protection of adults with care & support needs in the West Midlands April 2024
- 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
- Equality Act 2010 (including the Public Sector Equality Duty)
- Human Rights Act (HRA) 1998 HRA sets out the fundamental rights and freedoms that everyone in the UK is entitled to and contains the Articles and protocols of the European Convention on Human Rights (ECHR) (the Convention) that are deemed to apply in the UK. It compels public organisations to respect and protect an individual's human rights when they make individual decisions about them.
- 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 (Updated Jan 2023)

3.3 Underpinning guidance also includes:
- 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

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- 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)
- Education for a connected- world (Internet Safety)
- National Crime Agency's CEOP Education Programme: ThinkUKnow
- 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
- 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

3.4   The College fully recognises its moral and statutory responsibilities for safeguarding and promoting the welfare of all students.

4   Definitions

4.1   **Abuse** is a form of maltreatment of a student, and may involve inflicting harm or failing to act to prevent harm.

4.2   **Neglect** is a form of abuse and is the persistent failure to meet a student's basic physical and/or psychological needs, likely to result in the serious impairment of the student's health or development.

4.3   **Sharing of Nudes and Semi-Nudes** (also known as sexting or youth-produced sexual imagery) is where students share nude or semi-nude images, videos or live streams.

4.4   **Victim** is a widely understood and recognised term, but Chadsgrove understands that not everyone who has been subjected to abuse considers themselves a victim, or would want to be described that way. When managing an incident, the College is prepared to use any term that the student involved feels most comfortable with.

4.5   **Alleged Perpetrator(s)** and **Perpetrator(s)** are widely used and recognised terms. However, Chadsgrove thinks carefully about what terminology is used as, in some cases, abusive behaviour can be harmful to the perpetrator too. The College will decide what's appropriate and which terms to use on a case-by-case basis.

4.6   **Peer on Peer Abuse** is used in this policy to reflect the Child on Child abuse guidance for school settings, recognising our students are not children but are vulnerable to the same risks

4.7 **Adult at Risk** is used in this Policy, it replaces the term '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.

5 Equality Statement

5.1 Some students have an increased risk of abuse, both online and offline, and additional barriers can exist for some students with respect to recognising or disclosing it. The College is committed to anti-discriminatory practice and recognises student's diverse circumstances. The College ensures that all students have the same protection, regardless of any barriers they may face.

5.2 All students at the College have special educational needs and/or disabilities which may include complex health needs and which are likely to increase their vulnerability to abuse. Additionally, the College recognises that special consideration may also need to be given to students who:

- Are young carers

- May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality

- Have English as an additional language

- Are known to be living in difficult situations – for example, where there are issues such as substance abuse or domestic violence

- Are at risk of FGM, sexual exploitation, forced marriage or radicalisation

- Are asylum seekers

- Are at risk due to either their own or a family member's mental health needs

- Are looked after or previously looked after

- Are missing or absent from education for prolonged periods and/or repeat occasions

5.3 Provisions within the Equality Act allows the College to take positive action, where it can be shown that it is proportionate, to deal with particular disadvantages affecting students with certain protected characteristics in order to meet their specific need. This includes a duty to make reasonable adjustments for disabled young people.

6 Responsibilities

6.1 Safeguarding at the College is **everyone's responsibility**.

All Staff

6.2 All staff, including those who do not work directly with students are expected to read at least part 1 and Annex B (about specific safeguarding issues), of Keeping Children Safe in Education (KCSIE) at least annually. They will sign a declaration at the beginning of each academic year (or during induction) to say that they have read the guidance.

6.3 Every member of staff, including volunteers working with students at the College, are trained to maintain an attitude of 'it could happen here' where safeguarding is concerned and 'think beyond the obvious'.

6.4 All staff will:
- Have a responsibility to safeguard and promote the welfare of children. This includes a responsibility to be alert to possible abuse and to record and report concerns to the Designated Safeguarding Leads
- Always act in the interests of the student
- Reinforce the importance of online safety when communicating with students and where appropriate there with Parent Carers/advocate
- Provide a safe space for students who are LGBTQ+ to speak out and share their concerns

6.5   All staff will be aware of:
- The need to work with other services as needed and assist in making decisions about individual students
- The systems which support safeguarding, including this policy, the Staff Code of Conduct, the role and identity of the Designated Safeguarding Lead (DSL) and deputy/assistants, the Behaviour Policy, the Online Safety Policy (including the expectations, applicable roles and responsibilities in relation to filtering and monitoring) and the safeguarding response to students who are absent from education for prolonged periods and/or repeated occasions
- The Early Help process and their role in it, including identifying emerging problems, liaising with the DSL and sharing information with other professionals to support early identification and assessment
- The process for making referrals to adult social care and for statutory assessments that may follow a referral, including the role they might be expected to play
- The signs of different types of abuse and neglect, as well as specific safeguarding issues, such as peer-on peer abuse, exploitation, indicators of being at risk from or involved with serious violent crime, Female Genital Mutilation (FGM), radicalisation and serious violence (including that linked to County Lines)
- What to do if they identify a safeguarding issue or a student tells them they are being abused or neglected, including specific issues such as financial abuse, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals
- The importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe
- The fact that students can be at risk of harm inside and outside of their home, at College and online
- The fact that students who are (or who are perceived to be) lesbian, gay, bi or trans (LGBTQ+) can be targeted by others
- That students may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. Staff know that this should not prevent them from having a professional curiosity and speaking to the DSL if they have concerns about a students
- Their duty to raise concerns, where they exist, about the attitude or actions of colleagues using the College's Confidential Reporting (Whistleblowing) Policy.

The Directors (Governing Body)
6.6   The Directors will ensure that:
- There is a senior member on the College's leadership team who is designated to take lead responsibility for dealing with safeguarding (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 and Deputy DSL role is explicit in the role holders' job descriptions and that the DSL has the appropriate status and authority to carry out their job, including additional time, funding, training, resources and support
- All staff undergo safeguarding training, including online safety, and that such training is regularly updated and is in line with advice from any safeguarding partners
- The College operates safer recruitment practices, including appropriate use of references and checks on new staff and volunteers;
- All Directors will read Keeping Children Safe in Education in its entirety
- A link Director is appointed to monitor the effectiveness of this policy in conjunction with the full Directors Board. This is always a different person from the DSL
- That the College has appropriate filtering and monitoring systems in place, and review their effectiveness. This includes:
    - Make sure the DSL takes lead responsibility for understanding the filtering and monitoring systems in place as part of their role
    - Reviewing the DfE's filtering and monitoring standards, and discussing with IT staff and service providers what needs to be done to support the College in meeting these standards
    - Make sure staff understand their expectations, roles and responsibilities around filtering and monitoring as part of safeguarding training
- The College has procedures to manage any safeguarding concerns (no matter how small) or allegations that do not meet the harm threshold (low-level concerns) about staff members (including supply staff, volunteers and contractors).

6.7   The Directors will also ensure that:
  - A whole-college approach to safeguarding is facilitated, ensuring that safeguarding are at the forefront of, and underpin, all relevant aspects of process and policy development
  - This policy is evaluated and approved at each review, ensuring it complies with the law, and hold the Principal to account for its implementation
  - They are aware of its obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty), and the College's local multi-agency safeguarding arrangements
  - New staff and volunteers who work with students are made aware of the College's arrangements for safeguarding and their responsibilities
  - Safeguarding arrangements take into account the procedures and practice of the Worcestershire Safeguarding Adults Board (WSAB)
  - Information is provided to the Local Authority when requested, for example through the Annual Safeguarding Return (Section 175 Audit)
  - Students are taught about safeguarding, including online safety, as part of a broad and balanced curriculum
  - Online safety is a running and interrelated theme within the whole-college approach to safeguarding and related policies
  - The College contributes to inter-agency working in line with statutory guidance "Working Together to Safeguard Children 2023" including providing a co-ordinated offer of Early Help for students who require this
  - The College complies with all legislative safeguarding duties, including the duty to report suspected or known cases of FGM and 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
  - Safeguarding responses are put in place in cases where students are absent from education for prolonged periods and/or repeated occasions

6.8 The Directors will ensure that, where another body is providing services or activities at the College for example contractors or visiting speakers, regardless of whether or not the participants who attend these services/activities are students on the College roll:
  - Seek assurance that the other body has appropriate safeguarding policies/procedures in place, and inspect them if needed
  - Make sure there are arrangements for the body to liaise with the College about safeguarding arrangements, where appropriate
  - Make sure that safeguarding requirements are a condition of using the College premises, and that any agreement to use the premises would be terminated if the other body fails to comply

6.9   The Chair of Directors will act as the 'case manager' in the event that an allegation of abuse is made against the Principal, where appropriate

The Designated Safeguarding Lead (DSL)
6.10   The DSL is a member of the College Leadership Team (CLT). The College's DSL is Deb Rattley, Principal. The DSL takes lead responsibility for safeguarding at the College. This includes online safety, and understanding the filtering and monitoring processes on College devices and networks to keep students safe online.

6.11   During term time, the DSL will be available during College hours for staff to discuss any safeguarding concerns. Whilst generally speaking the Designated Safeguarding Lead (or deputy) 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. This includes email and mobile phone contact.

6.12   When the DSL is absent, the deputy will act as cover.

6.13   If the DSL and deputy are not available, the Assistant Safeguarding Leads (Angela Macvie and Leigh Blakeman) will act as cover. The Deputy and Assistant Designated Safeguarding Leads are all trained to the same standard as the Designated Safeguarding Lead. However, whilst the activities of the Designated Safeguarding Lead may be delegated to appropriately trained deputies,

the ultimate lead responsibility for safeguarding remains with the Designated Safeguarding Lead. This responsibility is not delegated.

6.14 The Designated Safeguarding Lead is expected to refer cases:
- of suspected abuse and neglect to the local authority adult's social care as required and support staff who make referrals to local authority adult's social care
- to the Channel programme where there is a radicalisation concern as required and support staff who make referrals to the Channel programme
- where a person is dismissed or left due to risk/harm to a student, to the Disclosure and Barring Service as required
- where a crime may have been committed to the Police as required

6.15 The Designated Safeguarding Lead is expected to:
- act as a source of support, advice and expertise for all staff
- act as a point of contact with the safeguarding partners
- as required, liaise with the "case manager" and the local authority designated officer (LADO) for adult at risk protection concerns in cases which concern a staff member
- liaise with all staff on matters of safety and safeguarding and welfare (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies so that student's needs are considered holistically
- have a good understanding of the filtering and monitoring systems and processes in place at the College
- liaise with the senior mental health lead where safeguarding concerns are linked to mental health
- promote supportive engagement with parent carers in safeguarding and promoting the welfare of students, including where families may be facing challenging circumstances
- take lead responsibility for promoting educational outcomes by knowing the welfare, safeguarding and adult at risk protection issues that student in need are experiencing, or have experienced, and identifying the impact that these issues might be having on student's attendance, engagement and achievement at college. This includes:
  o ensuring that college staff know who its cohort of students who have or have had a social worker are, understanding their academic progress and attainment, and maintaining a culture of high aspirations for this cohort
  o supporting teaching staff to provide additional academic support or reasonable adjustments to help students who have or have had a social worker reach their potential, recognising that even when statutory social care intervention has ended, there is still a lasting impact on student's educational outcomes

6.16 The Designated Safeguarding Lead is responsible for ensuring that protection files are kept up to date, confidential and stored securely within CPOMS.

6.17 Where student leave the college (including in year transfers) the Designated Safeguarding Lead should ensure their safeguarding file is transferred to the new provision as soon as possible, and within 5 days for an in-year transfer or within the first 5 days of the start of a new term. This should be transferred separately from the main student file, ensuring secure transit, and confirmation of receipt should be obtained.

6.18 In addition to the safeguarding file, the Designated Safeguarding Lead should also consider if it would be appropriate to share any additional information with the new provision in advance of a student leaving to help them put in place the right support to safeguard this young person to help them to thrive.

6.19 The Designated Safeguarding Lead should:

- ensure each member of staff has access to, and understands, the college's safeguarding policy and procedures, especially new and part-time staff
- ensure the college's safeguarding policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with the Director Board regarding this
- ensure the safeguarding policy is available publicly and parent carers know that referrals about suspected abuse or neglect may be made and the role of the college in this

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- link with the safeguarding partner arrangements to make sure staff are aware of any training opportunities and the latest local policies on local safeguarding arrangements
- help promote educational outcomes by sharing information about welfare, safeguarding, and protection issues that students who have or have had a social worker are experiencing with teachers and other relevant college staff

6.20 The Designated Safeguarding Lead (and deputy) must undergo training to provide them with the knowledge and skills required to carry out the role. This training should be updated at least every two years. The Designated Safeguarding Lead (and deputy) must also undertake Prevent awareness training. Training will provide Designated Safeguarding Leads with a good understanding of their own role, how to identify, understand and respond to specific needs that can increase the vulnerability of students, as well as specific harms that can put students at risk, and the processes, procedures and responsibilities of other agencies, particularly local authority adult's social care, so they:
- understand the assessment process for providing early help and statutory intervention, including local criteria for action and local authority adult's social care referral arrangements
- have a working knowledge of how local authorities conduct a adult protection case conference and be able to attend and contribute to these effectively when required to do so
- understand the importance of the role the designated safeguarding lead has in providing information and support to local authority adult's social care in order to safeguard and promote the welfare of students
- understand the lasting impact that adversity and trauma can have, including on student's behaviour, mental health and wellbeing, and what is needed in responding to this in promoting educational outcomes
- are alert to the specific needs of adults at risk, those with special educational needs and disabilities (SEND), those with relevant health conditions and young carers
- understand the importance of information sharing, both within the college and with the safeguarding partners, 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
- are able to understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep students safe whilst they are online at college
- can recognise the additional risks that adults with special educational needs and disabilities (SEND) face online, for example, from bullying, grooming and radicalisation and are confident they have the capability to support students with SEND 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

6.21 In addition to the formal training set out above, their knowledge and skills should be refreshed at regular intervals, as required, and at least annually, to allow them to understand and keep up with any developments relevant to their role.

6.22 Training should support the Designated Safeguarding Lead in developing expertise, so they can support and advise staff and help them feel confident on welfare, safeguarding matters. This includes specifically to:
- ensure that staff are supported during the referrals processes
- support staff to consider how safeguarding, welfare and educational outcomes are linked, including to inform the provision of academic and pastoral support

6.23 It is important that all students feel heard and understood. Therefore, The Designated Safeguarding Leads (and deputy) should be supported in developing knowledge and skills to:
- encourage a culture of listening to students and taking account of their wishes and feelings, among all staff, and in any measures the college may put in place to protect them
- understand the difficulties that students may have in approaching staff about their circumstances and consider how to build trusted relationships which facilitate communication

6.24 The Designated Safeguarding Lead should be equipped to:

- understand the importance of information sharing, both within the college and with other provisions on transfer and with the safeguarding partners, other agencies, organisations and practitioners
- understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR)
- be able to keep detailed, accurate, secure records of concerns and referrals and understand the purpose of this record-keeping

The Principal

6.25 The Principal is responsible for the implementation of this policy, including:
- Ensuring that staff (including temporary staff) and volunteers:
    - Are informed of the systems which support safeguarding, including this policy, as part of their induction
- Understand and follow the procedures included in this policy
- Communicating this policy to Parent Carers/Advocates when their young adult joins the College and via the College website
- Making sure that online safety training is included in staff safeguarding training
- Ensuring that she, as the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if she is absent
- Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate and ensuring that allegations of abuse or concerns that a member of staff or adult working at College may pose a risk of harm to a young person are notified to the LADO in a timely manner
- Making decisions regarding all low-level concerns
- Ensuring the relevant staffing ratios are met, where applicable
- Overseeing the safe use of technology, mobile phones and cameras in the setting
- 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

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 2023. 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 students, 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 students. Staff are proactive in sharing information as early as possible to help identify, assess, and respond to risks or concerns about the safety and welfare of 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 students are confidential. The DSL or the DDSL will disclose any information about a student 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 advic

7.14   The governments Information Sharing Advice for Safeguarding Practitioners includes 7 golden rules for sharing information, and will support staff who have to make decision about sharing information

7.15   It is the expectation that all individuals working at Chadsgrove College from external agencies, for example health professionals, care workers and contractors, adhere to all of the policies and practices that are in place at the College. This includes the Safeguarding Policy.

8   Recognising Abuse and Taking Action

8.1   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 usually made in line with local procedures as detailed on the [Worcestershire Safeguarding Adult's Board Website.](#) However, some referrals, for example for students from different local authorities, will be made in line with procedures from those local authorities.

8.2   All staff at the College will have an awareness of safeguarding issues that can put students at risk of harm, It is recognised that behaviours linked to issues such as
- drug taking and/or alcohol misuse
- unexplained and/or persistent absences from education
- serious violence (including that linked to county lines)
- radicalisation
- consensual and non-consensual sharing of nude and semi-nude images and/or videos can all be signs that children are at risk

8.3   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 student at the earliest opportunity. A reliance on memory without accurate and contemporaneous records of concern could lead to a failure to protect.

8.4   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.

8.5   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. All information and actions taken, including the reasons for any decisions made, will be fully documented on CPOMS.

If a student is suffering or likely to suffer harm, or in immediate danger

8.6   Ordinarily, the DSL will make a referral to adult's social care and/or the police immediately if it is believed that a student is suffering or likely to suffer from harm, or is in immediate danger. Anyone, not just the DSL, can make a referral, but the DSL should be informed, as soon as possible if this happens.

If a student makes a disclosure

8.7   If a student discloses a safeguarding issue, all staff are expected to:
- Listen to and believe them
- Allow them time to talk freely and do not ask leading questions
- Stay calm and do not show any emotion
- Tell the student they have done the right thing in speaking up
- Explain what will happen next and that the information will need to be passed on
- Not promise to keep a secret
- Speak to the DSL or Deputy as soon as possible. Contact an assistant DSL or member of the College Leadership Team if necessary but **never do nothing**
- Write up the conversation, onto CPOMS, as soon as possible and certainly before the end of the college day. Use the student's own words, stick to the facts and avoid opinion

- If appropriate, make a referral to adult's social care and/or the police directly, and tell the DSL as soon as possible that this has happened. Aside from these people, information should not be disclosed to anyone else unless told to do so by a relevant authority involved in the safeguarding process

8.8 All staff are expected to bear in mind that some students may:
- Not feel ready, or know how to tell someone that they are being abused or exploited
- Not recognise their experiences as harmful
- Feel embarrassed, humiliated or threatened. This could be due to their vulnerability, disability, sexual orientation and/or language barriers

If there are concerns about a student's welfare (as opposed to believing a student is suffering or likely to suffer from harm, or is in immediate danger)

8.9 Figure 1 below, illustrates the procedure to follow if there are any concerns about a student's welfare.

Figure 1
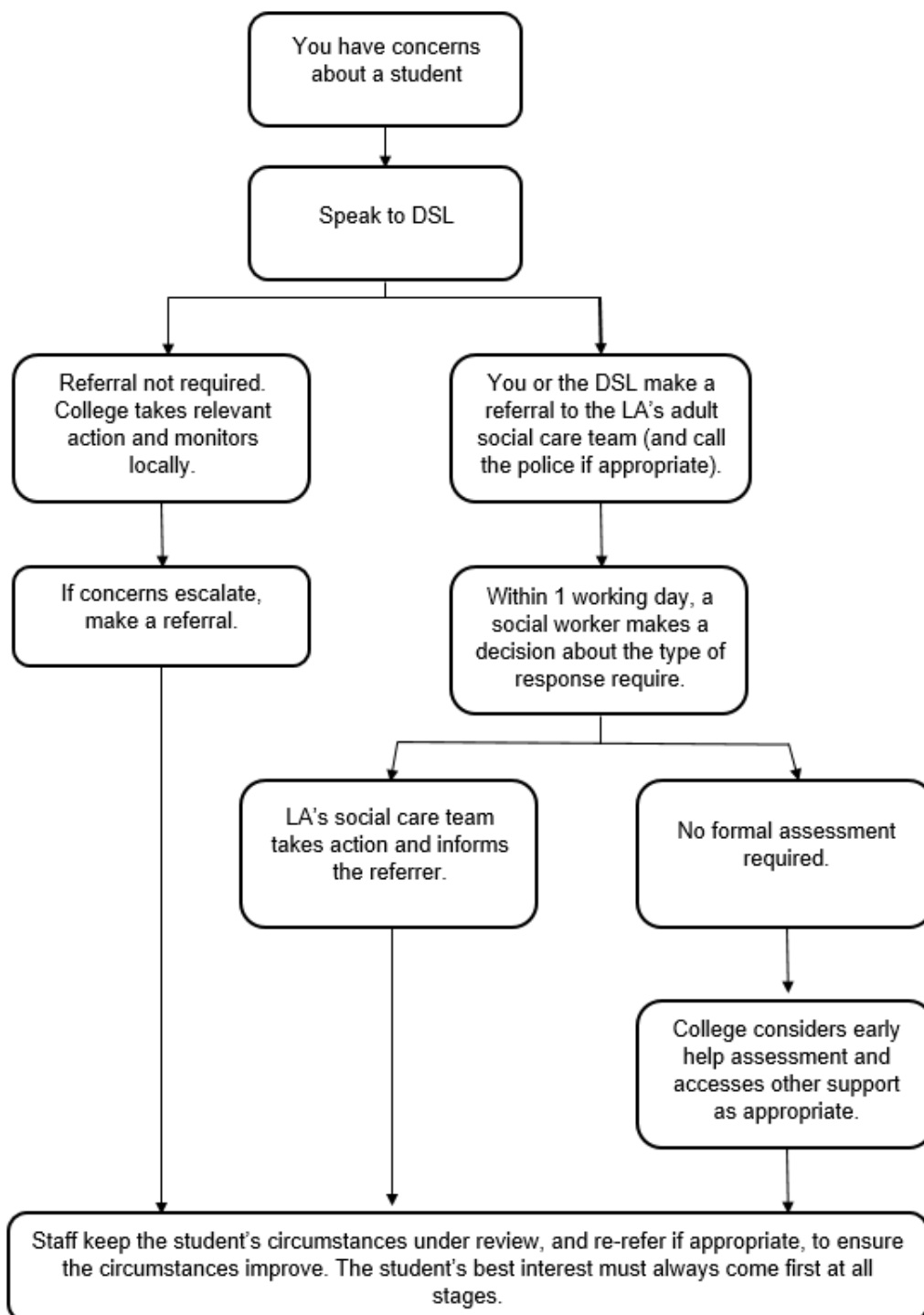
8.10   The DSL should be spoken to, in the first instance, in order to agree a course of action.

8.11   If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. All staff should speak to a member of the College Leadership Team and/or take advice from local authority adults's social care. Details of any actions taken should be shared with the DSL as soon as practically possible.

Referral
8.12   If it is appropriate to refer the case to local authority adult's social care or the police, the DSL will make the referral or support a member of staff to do so, if appropriate.

8.13   If a referral is made directly by a member of staff, the DSL must be informed as soon as possible.

8.14   The local authority will make a decision within 1 working day of a referral about what course of action to take and will let the person who made the referral know the outcome. The DSL or person who made the referral must follow up with the local authority if this information is not made available, and ensure outcomes are properly recorded.

8.15   If the student's situation does not seem to be improving after the referral, the DSL or person who made the referral must follow local escalation procedures to ensure their concerns have been addressed and that the student's situation improves.

If it is discovered that FGM has taken place or a student is at risk of FGM (Appendix F)
8.16   Keeping Children Safe in Education explains that FGM comprises "all procedures involving partial or total removal of the external female genitalia, or other injury to the female genital organs". FGM is illegal in the UK and a form of abuse with long-lasting, harmful consequences. It is also known as 'female genital cutting', 'circumcision' or 'initiation'.

8.17   Any teacher/tutor who either:

   -    Is informed by a girl under 18 that an act of FGM has been carried out on her; or
   -    Observes physical signs which appear to show that an act of FGM has been carried out on a girl under 18 and they have no reason to believe that the act was necessary for the girl's physical or mental health or for purposes connected with labour or birth

   must immediately report this to the police, personally. This is a mandatory statutory duty, and teachers/tutors will face disciplinary sanctions for failing to meet it. Unless they have been specifically told not to disclose, teachers/tutors should also discuss the case with the DSL and involve children's/adult's social care as appropriate.

8.18   The duty for teachers/tutors mentioned above does not apply in cases where a student is at risk of FGM or FGM is suspected but is not known to have been carried out. Staff should not examine students**.**

8.19   **Any other member of staff** who discovers that an act of FGM appears to have been carried out on a **child under 18** must speak to the DSL and follow the local safeguarding procedures.

8.20   Any **member of staff** who suspects a child is *at risk* of FGM or suspects that FGM has been carried out or discovers that a student **aged 18 or over** appears to have been a victim of FGM should speak to the DSL and follow the local safeguarding procedures.

If there are concerns about extremism (Appendix H)
8.21   If a student is not suffering or likely to suffer from harm, or in immediate danger, staff are expected to speak to the DSL first in order to agree a course of action.

8.22   If, in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Staff members are expected to speak to a member of the College Leadership Team and/or seek advice from local authority adult's social care. A referral to local authority adult's social care can be made directly, if appropriate, but the DSL or deputy must be informed about this as soon as practically possible.

8.23   Where there is a concern, the DSL will consider the level of risk and decide which agency to make a referral to. This could include Channel, the government's programme for identifying and supporting individuals at risk of being drawn into terrorism, or the local authority adult's social care team. An individual will be required to provide their consent before any support delivered through the Channel programme is provided

8.24   The DfE also has a dedicated telephone helpline, 020 7340 7264, which education staff and governors/directors can call to raise concerns about extremism with respect to a student. You can also email counter.extremism@education.gov.uk. Note that this is not for use in emergency situations.

8.25   In an emergency, staff are expected to call 999 or the confidential anti-terrorist hotline on 0800 789 321. This would be the case if a member of staff:

-    Thought someone was in immediate danger
-    Thought someone may be planning to travel to join an extremist group
-    Saw or heard something that may be terrorist-related

If there is a concern about Mental health

8.26   Mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

8.27   All staff are aware that mental health problems can, in some cases, be an indicator that a student has suffered or is at risk of suffering abuse, neglect or exploitation. Where students have suffered abuse and neglect, or other potentially traumatic adverse experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these student's experiences, can impact on their mental health, behaviour and education.

8.28   At Chadsgrove, trained staff 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. However, it is made clear to staff that only appropriately trained professionals should attempt to make a diagnosis of a mental health problem.

8.29   Chadsgrove 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. Public Health England has produced a range of resources to support education settings to promote positive health, wellbeing, and resilience among children and young people. See Rise Above for links to all materials and lesson plans.

8.30   If college staff have a mental health concern about a student that is also a safeguarding concern, immediate action will be taken, following this policy and speaking to the DSL or a Deputy.

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

8.31   College staff recognise that adults at risk are vulnerable to physical, sexual and emotional abuse by their peers. Abuse will never be tolerated or passed off as "banter", "just having a laugh" or "part of growing up", as this can lead to a culture of unacceptable behaviours and an unsafe environment for students.

8.32   The College also recognises the gendered nature of Peer on Peer abuse. However, all abuse is unacceptable and will be taken seriously.

8.33   A young person being lesbian, gay or bisexual is not in itself an inherent risk factor for harm, however, they can sometimes be targeted by peers. In some case, a student who is perceived by other students to be lesbian, gay, or bisexual (whether they are or not) can be just as vulnerable as students who are

8.34   The Cass review identified that caution is necessary for young people questioning their gender as there remain many unknowns about the impact of social transition and young people may well have wider vulnerabilities, including having complex mental health and psychosocial needs, and in some cases additional diagnosis of autism spectrum disorder and/or attention deficit hyperactivity disorder

8.35   The Cass review recommended that when families/carers are making decisions about support for gender questioning young people, they should be encouraged to seek clinical help and advice. When parents are supporting pre-pubertal children, clinical services should ensure that they can be seen as early as possible by a clinical professionals with relevant experience.

8.36   As such, when supporting a gender questioning young person, The College will take a cautious approach and consider the broad range of their individual needs, in partnership with the student's parent carer/advocate (other than in exceptionally rare circumstances where involving parents would constitute a significant risk to the young person), including any clinical advice that is available and how to address wider vulnerabilities such as the risk of bullying. The college should refer to the Guidance for schools and colleges in relation to gender questioning children, when deciding how to proceed.

8.37   Most cases of students hurting other students will be dealt with under the College's behaviour policy, but this safeguarding policy will apply to any allegations that raise safeguarding concerns. This might include where the alleged behaviour:
   -    Is serious, and potentially a criminal offence
   -    Could put students in the college at risk
   -    Is violent
   -    Involves students being forced to use drugs or alcohol
   -    Involves sexual exploitation, sexual abuse or sexual harassment, such as indecent exposure, sexual assault, upskirting or sexually inappropriate pictures or videos (including the sharing of nudes and semi-nudes)

8.38   If a student makes an allegation of abuse against another student:
   -    Staff are expected to record the allegation and tell the DSL, but not investigate it
   -    The DSL will contact the local authority adult's social care team and follow its advice, as well as the police if the allegation involves a potential criminal offence
   -    The DSL will put a risk assessment and support plan into place for all students involved (including the victim(s), the student(s) against whom the allegation has been made and any others affected) with a named person they can talk to if needed. This will include considering college transport as a potentially vulnerable place for a victim or alleged perpetrator(s)

8.39   If the incident is a criminal offence and there are delays in the criminal process, the DSL will work closely with the police (and other agencies as required) while protecting students and/or taking any sanctions against the alleged perpetrator.

8.40   Risks can be compounded where students lack trusteed adults with whom they can be open. It is therefore vital that staff endeavour to reduce the additional barriers faced and create a culture where they can speak out or share their concerns with members of staff.

8.41   Chadsgrove recognises the importance of taking proactive action to minimise the risk of peer-on-peer abuse, and of creating a supportive environment where victims feel confident in reporting incidents.

8.42   To achieve this, the College will:

- Challenge any form of derogatory or sexualised language or inappropriate behaviour between peers
- Be vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards females, and initiation or hazing type violence with respect to males
- Ensure the curriculum helps to educate students about appropriate behaviour and consent
- Ensure students are able to easily and confidently report abuse using the reporting systems
- Ensure staff reassure victims that they are being taken seriously
- Be alert to reports of sexual violence and/or harassment that may point to environmental or systemic problems that could be addressed by updating policies, processes and the curriculum, or could reflect wider issues in the local area that should be shared with safeguarding partners
- Support students who have witnessed sexual violence and make sure the victim, alleged perpetrator(s) or any witnesses are not bullied or harassed
- Consider intra-familial harms and any necessary support for siblings following a report of sexual violence and/or harassment
- Ensure staff are trained to understand:
    - How to recognise the indicators and signs of peer-on-peer abuse, and know how to identify it and respond to reports
    - That if they have any concerns about a student's welfare, they should act on them immediately rather than wait to be told, and that victims may not always make a direct report. For example, a student's behaviour might indicate that something is wrong
    - That certain students may face additional barriers to telling someone because of their vulnerability, disability, gender, ethnicity and/or sexual orientation
    - That a student harming another student could be a sign that the student is being abused themselves, and that this would fall under the scope of this policy
    - The important role they have to play in preventing peer-on-peer abuse and responding where they believe a student may be at risk from it
    - That they should speak to the DSL if they have any concerns
    - That social media is likely to play a role in the fall-out from any incident or alleged incident, including for potential contact between the victim, alleged perpetrator(s) and friends from either side

8.43   The DSL will take the lead role in any sanctioning of the alleged perpetrator(s). The College will provide support at the same time as taking any disciplinary action.

8.44   Sanctions can be taken while other investigations are going on, e.g. by the police. The fact that another body is investigating or has investigated an incident doesn't (in itself) prevent the College from coming to its own conclusion about what happened and imposing a penalty accordingly. The College will consider these matters on a case-by-case basis, taking into account whether:

- Taking action would prejudice an investigation and/or subsequent prosecution
- There are circumstances that make it unreasonable or irrational for the College to reach its own view about what happened while an independent investigation is ongoing

If there are concerns about Sharing of Nudes and Semi-Nudes ('sexting')

8.45   If a member of staff is made aware of an incident involving the consensual or non-consensual sharing of nude or semi-nude images/videos (also known as 'sexting' or 'youth produced sexual imagery'), it must be reported to the DSL immediately.

8.46   Staff are aware that they must **not**:

- View, copy, print, share, store or save the imagery, or ask a student to share or download it
- Delete the imagery or ask the student to delete it
- Ask the individual(s) who are involved in the incident to disclose information regarding the imagery (this is the DSL's responsibility)
- Share information about the incident with other members of staff, the individual(s) it involves or their, or other, Parent Carers/Advocates

- Say or do anything to blame or shame any young people involved

8.47 Staff are expected to explain to those involved that the incident needs to be reported and to reassure the individual(s) that they will receive support and help from the DSL.

8.48 Following a report of an incident, the DSL will hold an initial review meeting with appropriate college staff – this may include the staff member who reported the incident and the safeguarding or leadership team that deals with safeguarding concerns. This meeting will consider the initial evidence and aim to determine:
- Whether there is an immediate risk to individual(s)
- If a referral needs to be made to the police and/or adult's social care
- If it is necessary to view the image(s) in order to safeguard the young person (in most cases, images or videos should not be viewed)
- What further information is required to decide on the best response
- Whether the image(s) has been shared widely and via what services and/or platforms (this may be unknown)
- Whether immediate action should be taken to delete or remove images or videos from devices or online services
- Any relevant facts about the student's involved which would influence risk assessment
- If there is a need to contact another school, college, setting or individual
- Whether to contact Parents Carers/Advocates of the student's involved (in most cases Parent Carers/Advocates should be involved)

8.49 The DSL will make an immediate referral to police and/or adult's social care if:
- The incident involves an adult that is not a student at the College
- There is reason to believe that the student has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example, owing to SEN)
- What the DSL knows about the images or videos suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent
- The imagery involves sexual acts
- The imagery involves children
- The DSL has reason to believe anyone is at immediate risk of harm owing to the sharing of nudes and semi-nudes (for example, the young person is presenting as suicidal or self-harming)

8.50 If none of the above apply then the DSL, in consultation with the College Leadership Team and other members of staff as appropriate, may decide to respond to the incident without involving the police or adult's social care. The decision will be made and recorded in line with the procedures set out in this policy.

8.51 If at the initial review stage a decision has been made not to refer to police and/or adult's social care, the DSL will conduct a further review to establish the facts and assess the risks.

8.52 They will hold interviews with the individuals involved (if appropriate).

8.53 If at any point in the process there is a concern that a student has been harmed or is at risk of harm, a referral will be made to adult's social care and/or the police immediately.

8.54 If it is necessary to refer an incident to the police, this will be done through dialling 101.

9   Notifying Parent Carers/Advocates
9.1 Where appropriate, the College will discuss any concerns about a student with the student's Parent Carer/Advocate. The DSL will normally do this in the event of a concern or disclosure. Other staff will only talk to Parent Carer/Advocate about any such concerns following consultation with the DSL.

9.2   If it is believed that notifying Parent Carers/Advocate would increase the risk to the student, the DSL will discuss this with the local authority adults's social care team before doing so.

9.3   In the case of allegations of Peer-on-Peer abuse, the College will normally notify the Parent Carer/Advocate of all the students involved. The College will think carefully about what information is provided about any other students involved, and when. The College will also work with the police and/or local authority adult's social care to make sure that the College's approach to information sharing is consistent. The DSL will, along with any relevant agencies (this will be decided on a case-by-case basis):
-    Meet with the victim's Parent Carer/Advocate, with the victim, to discuss what's being put in place to safeguard them, and understand their wishes in terms of what support they may need and how the report will be progressed
-    Meet with the alleged perpetrator's Parent Carer/Advocate to discuss support for them, and what's being put in place that will impact them, e.g. moving them out of classes with the victim, and the reason(s) behind any decision(s)

10 Early Help
10.1   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:
-    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 absent from education for prolonged periods and/or repeated occasions, including parts of the college day

10.2   The College's Early Help/Supporting Families offer can be found on the College website.

11 Safeguarding in the Curriculum
11.1   Whilst the local area statistics show that, in April 2024, violence/sexual offences, criminal damage and theft are the highest crimes committed, as the college is in an extended catchment area, other crimes are also considered. In particular, there is a focus on the students learning how to keep themselves safe (Data taken from https://www.crime-statistics.co.uk).

11.2   Chadsgrove plays a crucial role in preventative education. This is in the context of a whole-college approach to preparing students for life in modern Britain, and a culture of zero tolerance of sexism, misogyny/misandry, homophobia, biphobia, transphobia and sexual violence/harassment. This will be underpinned by the College's Behaviour policy, pastoral support system and RSHCE delivered in regularly timetabled lessons, further reinforced throughout the whole curriculum.

11.3   Students are taught about safeguarding at the College. The following areas are among those embedded into the Preparing for Adulthood Curriculum:
-    Bullying/Cyber Bullying
-    Exploitation
-    Domestic Abuse
-    Drugs, Alcohol and Substance Abuse
-    Extremism and Radicalisation
-    Fire and Water Safety
-    Healthy Relationships

- Consent
- Online Safety / Mobile technologies
- Peer to Peer Abuse
- Road Safety
- Sexual Violence and Sexual Harassment
- So called Honour Based Violence issues (HBV) e.g. Forced Marriage, Female Genital Mutilation (FGM)
- Stranger Danger
- Sharing nudes and semi-nudes
- Financial or material abuse
- Modern slavery
- Discriminatory abuse
- Organisational abuse
- Neglect and acts of omission
- Self-neglect

11.4   As part of providing a broad and balanced curriculum, safeguarding topics are 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.

11.5   LGBTQ+ inclusion is part of the statutory Relationships Education, Relationships and Sex Education (RSE) and Health Education curriculum and there is a range of support available to help education settings counter homophobic, biphobic and transphobic bullying and abuse.

11.6   The fact that a student may be LGBTQ+ is not in itself an inherent risk factor for harm. However, students who are LGBT can be targeted by others. In some cases, a student who is perceived by others to be LGBT (whether they are or not) can be just as susceptible as students who identify as LGBTQ+.

11.7   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.

12 Reporting Systems for Students

12.1   Where there is a safeguarding concern, the College will take the student's wishes and feelings into account when determining what action to take and what services to provide.

12.2   The College recognises the importance of ensuring students feel safe and comfortable to come forward and report any concerns and/or allegations.

12.3   To achieve this, we will:

- Put systems in place for students to confidently report abuse
- Ensure that reporting systems are well promoted, easily understood and easily accessible for students
- Make it clear to students that their concerns will be taken seriously, and that they can safely express their views and give feedback

12.4   A student friendly safeguarding Policy is in place

12.5   Due to the complex nature of the student's needs at the College, it is likely that students may also express any worries or concerns, whether this is verbally or through their behaviours, to the adults that they feel safest or closest to in College – for example, a Tutor or Learning Support Assistant. Should this occur, all staff are expected to follow the guidance in this policy and share any concerns with the DSL immediately.

13 Online Safety and the Use of Mobile Technology

13.1   Students may expose themselves to danger, whether knowingly or unknowingly, when using the internet and other technologies. Additionally, some young people may find themselves involved in activities, which are inappropriate or possibly illegal. The College, therefore, recognises its'

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.

13.2   To address this, the College aims to:
- Have robust processes (including filtering and monitoring systems) in place to ensure the online safety of students, staff, volunteers Directors
- Protect and educate the whole College community in its safe and responsible use of technology, including mobile and smart technology (which we refer to as 'mobile phones')
- Set clear guidelines for the use of mobile phones for the whole College community
- Establish clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate

13.3   The College's approach to online safety is based on addressing the following categories of risk:

- **Content** – being exposed to illegal, inappropriate or harmful content, such as pornography, fake news, racism, misogyny, self-harm, suicide, antisemitism, radicalisation and extremism

- **Contact** – being subjected to harmful online interaction with other users, such as 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, such as 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

13.4   To meet the College aims and address the risks above, the College will:
- Educate students about online safety as part of our curriculum, for example, the safe use of social media, the internet and technology and how to report any incidents of cyber-bullying, including where they're a witness rather than a victim
- Train staff, at least once per year, on safe internet use and online safeguarding issues including cyber-bullying, the risks of online radicalisation, and the expectations, roles and responsibilities around filtering and monitoring
- Educate Parent Carers/Advocates about online safety and College procedures via the College website, communications sent directly to them and during parents' evenings
- Make sure staff are aware of any restrictions placed on them with regards to the use of their mobile phone and cameras, for example that staff are allowed to bring their personal phones to College for their own use, but use is limited to non-contact time, in the staff room when students are not present and that staff are not allowed to take pictures or recordings of students on their personal phones or cameras
- Make all students, staff, volunteers and Directors aware that they are expected to sign an agreement regarding the acceptable use of the internet at the College, use of these ICT systems and use of their mobile and smart technology
- Explain the sanctions that will be used if a student is in breach of the policies on the acceptable use of the internet and mobile phones
- Carry out an annual review of the approach to online safety

13.5   The College does all it reasonably can to limit student's exposure to online risks from the IT system. As part of this process, the Directors ensure that the College has appropriate filters and monitoring systems in place and regularly review their effectiveness. Such filters are in place to prevent access to unsuitable sites and enables the monitoring of the use of the 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 'Senso Cloud' application is used for this purpose.

13.6   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 Senso Cloud) to prevent "over blocking" leading to unreasonable restrictions as to what students can be taught with regard to online teaching and safeguarding.

13.7   In line with the College's general policy on the use of staff mobile phones and technology such as smart watches that have the ability to record images, these are not permitted in classrooms/bathrooms or any other areas frequented by students.

14   Photography and the use of Images

14.1   The welfare and protection of students at the College is paramount and consideration is always given to whether the use of photography will place students at risk. It is recognised that images may be used to harm, for example as a preliminary to 'grooming' or by displaying them inappropriately on the internet, particularly social networking sites. For this reason, consent is always sought when photographing students using any means and including iPads, smart phones or cameras and additional consideration is given to photographing adult at risk, particularly students who are subject to a protection order. 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.

14.2   Some students 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/Advocates who continue to support students as a result of their learning difficulties are also advised as necessary.

14.3   Only College owned iPads, smart phones and cameras are used for photographs and not personal devices. Staff must not photograph students using their own photographic equipment or mobile phone or smart watch unless they have the express permission of the Principal to do so and transfer the images to the college server as soon as is reasonably practical.

15   Students with additional needs or vulnerabilities (Appendix J)

15.1   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 disproportionally impacted by behaviours such as bullying without outwardly showing any signs
   - Communication barriers and difficulties in overcoming these barriers

15.2   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.

15.3   All staff receive training about the specific needs of students with disabilities. This includes recognising the difficulties with recognising abuse, communicating worries/concerns and the need for professional curiosity. All staff know that they need to report any concerns, however small.

15.4   College staff will consider extra pastoral support and attention for any student with SEND or health issues, along with ensuring appropriate support for communication is in place. Staff will make reference to the SEND Code of Practice, the document 'supporting students with medical conditions in school' and will also consult specialist organisations such as SENDIASS, The council for Disabled Children and MENCAP, as necessary.

16   Positive Physical Intervention/Use of Reasonable Force

16.1   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.

16.2   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.

16.3   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.

16.4   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.

16.5   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.

16.6   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.

17   Health and Safety

17.1   The College's Health & Safety Policy, set out in a separate document, reflects the consideration given to the safeguarding of students both within the College and when off-site, for example when undertaking trips and visits.

17.2   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.

17.3   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.

17.4   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.

17.5   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.

18   Complaints and Concerns about College Safeguarding Policies and Procedures
Complaints/Allegations against Staff

18.1   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.

18.2   The College ensures that it promotes an open and transparent culture in which all concerns about any adult working in or on behalf of the College (including supply teachers, volunteers and contractors) are dealt with promptly and appropriately. Creating a culture in which all concerns about adults are shared responsibly and with the right person, recorded and dealt with appropriately, is critical. If implemented correctly, this should:

- Enable the College to identify inappropriate, problematic or concerning behaviour early
- Minimise the risk of abuse and ensure that adults working in or on behalf of the College are clear about professional boundaries and act within these boundaries

18.3 All staff are aware of their duty to raise concerns, where they exist, about the attitude or actions of colleagues using the 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 should be referred to the Principal. Where there are concerns/allegations about the Principal this will be referred to the chair of Directors.

18.4 An allegation may be made if it is considered that an individual has:

- possibly committed a criminal offence against or related to a child/adult at risk and/or;
- behaved towards an adult at risk or child in a way that indicates he or she may pose a risk of harm to students; and/or
- behaved or may have behaved in a way that indicates they may not be suitable to work with adults at risk

18.5 Complaints/allegations against staff that are likely to require a safeguarding investigation will be handled in accordance with the College's procedures for dealing with allegations of abuse made against staff. These procedures are consistent with local safeguarding procedures and practice guidance and have regard to this guidance. A 'case manager', with training in the management of allegations will lead any investigation. This will be either the Principal or, where the Principal is the subject of an allegation, the Chair of Directors. For internal investigations, the Principal will appoint the Vice Principal as the Investigating Officer.

18.6 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 should be referred to the Principal
- Where there are concerns/allegations about the Principal, this should be referred to the chair of Directors if it is felt that there is a conflict of interest in reporting a concern or allegation about a member of staff to the Principal, then the local authority designated officer (LADO) should be contacted.

18.7 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 the Director from office.

18.8 If an allegation is received relating to an incident where an individual or organisation was using the College premises for running an activity, then the College safeguarding policies and procedures should be followed, informing the LADO, as necessary, as would be the case with any safeguarding allegation.

18.9 When dealing with allegations, the College will:
- Apply common sense and judgement
- Deal with allegations quickly, fairly and consistently
- Provide effective protection for the student and support the person subject to the allegation
- Inform Ofsted, if necessary, of any allegations and actions taken, within the necessary timescales

18.10 The College will ensure all staff understand the local authority arrangements for managing allegations, including the contact details and what information the LADO will require when an allegation is made. Before contacting the LADO, the College will conduct basic enquiries in line with local procedures to establish the facts to help them determine whether there is any foundation to the allegation, being careful not to jeopardise any future police investigation. For example:
- Was the individual in the College at the time of the allegations?
- Did the individual, or could they have, come into contact with the student?
- Were there any witnesses?

18.11 When to inform the individual of the allegation will be considered carefully on a case by case basis, with guidance as required from the LADO, Human Resources, and if appropriate adult social care and the police.

18.12 If there is cause to suspect a student is suffering, or is likely to suffer significant harm, a strategy discussion involving the police and/or adult's social care services will be convened

18.13 If the allegation is about physical contact, for example restraint, the strategy discussion or initial evaluation with the LADO will take into account that tutors and other staff are entitled to use reasonable force to control or restrain students in certain circumstances, including dealing with disruptive behaviour. Where it is clear that an investigation by the police or adult's social care services is unnecessary, or the strategy discussion or initial evaluation decides that is the case, the LADO should discuss the next steps with the case manager.

18.14 Where the case manager is concerned about the welfare of other children/adults at risk in the community or the member of staff's family, a risk assessment of the situation will be made. It may be necessary for a referral to be made to children's/adult's social care.

18.15 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 work. The College has clear policy on pay arrangements whilst the person is suspended or where there is an Interim Prohibition Order in place.

18.16 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 who will provide relevant information received from the police or adult's social care on whether they have any objections to the member of staff continuing to work during the investigation of the case.

18.17 The College has a duty of care to its employees. The College will ensure that it provides effective support for anyone facing an allegation and provide them with a named contact if they are suspended. It is essential that any allegation of abuse made against a tutor or other member of staff or volunteer is dealt with very quickly, in a fair and consistent way that provides effective protection for the student and, at the same time supports the person who is the subject of the allegation

Complaints/Allegations involving staff from supply/recruitment agencies

18.18 The College does not, currently, employ tutors or support staff from employment agencies. However, in some circumstances, Chadsgrove may need to consider an allegation against an individual not directly employed by them, where its disciplinary procedures do not fully apply. For example, therapists providing a service in College, whilst not employed by the College, would still be under the supervision, direction and control of the Directors when working in the College.

18.19 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 person not employed by the College due to safeguarding concerns, without finding out the facts and liaising with the Local Authority Designated Officer (LADO) to determine a suitable outcome. The Directors will discuss with the agency whether it is appropriate to suspend the person whilst they carry out their investigation.

18.20 Agencies should be fully involved and co-operate with any enquiries from the LADO, police and/or adult's social services. 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 as part of the referral process.

18.21 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.

18.22 Allegations against a tutor who is no longer teaching will be referred to the police, as will historical allegations of abuse.

18.23 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.

Low-Level Concerns

18.24 The Governing body has policies and processes to deal with any concerns (including allegations) which do not meet the harm threshold; these are referred to as 'low-level' concerns.

18.25 The term 'low-level' concern does not mean that it is insignificant. A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' - that an adult working in or on behalf of the College may have acted in a way that is inconsistent with the staff code of conduct, including inappropriate conduct outside of work and does not meet the harm threshold or is otherwise not serious enough to consider a referral to the LADO. Examples of such behaviour could include, but are not limited to:

- Being over friendly with students
- Having favourites
- Taking photographs of students on their mobile phone, contrary to College policy
- Engaging with a student on a one-to-one basis in a secluded area or behind a closed door
- Humiliating students

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

18.27 Low-level concerns may arise in several ways and from a number of sources. For example: suspicion; complaint; or disclosure made by a student, parent or other adult within or outside of the organisation; or as a result of vetting checks undertaken.

18.28 It is crucial that all low-level concerns are shared responsibly with the right person, and recorded and dealt with appropriately. Ensuring they are dealt with effectively should also protect those working in or on behalf of schools and colleges from becoming the subject of potential false low-level concerns or misunderstandings

Other Complaints/Concerns

18.29 Other complaints or concerns, of a safeguarding nature – for example, those to do with premises, health and safety or student behaviour still need to be reported to the Designated Safeguarding Lead who will then determine the best course of action to take.

18.30 A complaints policy is in place and any complaints from Parent Carers/Advocates, along with their outcome are maintained by the Principal or on the Student's CPOMS file

18.31 The College will investigate written complaints and notify complainants of the outcome of the investigation within 28 days of having received the complaint. The record of complaints will be made available to Ofsted on request.

18.32 Details about how to contact Ofsted are made available on the College website and in the Complaints Policy and Parent Carers/Advocates will be informed of an Ofsted visit. Parent Carers/Advocates will also be provided with a copy of the report following an inspection.

19 Record-Keeping

19.1 Well-kept records are essential to good safeguarding practice. All staff are clear about the need to record and report concerns about any student or students within the College. The Designated Safeguarding Lead is responsible for such records and for deciding at what point these records should be passed over to other agencies.

19.2 At the College, records relating to actual or alleged abuse are stored electronically on CPOMS. These records are separate from the normal student or staff records. The records are stored securely, with access confined to specific staff via two-factor authentication. CPOMS maintains a complete record of who has accessed an individual's file and when this occurred.

19.3 Any member of staff receiving a disclosure of abuse from a young person, 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 young person's own words as far as possible. CPOMS will automatically time and date the incident as well as the name of the member of staff submitting it.

19.4 External agency staff, who do not have access to CPOMS, are provided with a Form 1 (Appendix N) as part of their induction. They are asked to complete this, if they have a safeguarding concern, and pass it to the Designated Safeguarding Lead immediately and prior to leaving the premises.

19.5 All concerns, discussions and decisions made, and the reasons for those decisions, are recorded on CPOMS.

19.6 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

19.7 If in doubt about recording requirements, staff are expected to discuss this with the Designated Safeguarding Lead (or deputy).

19.8 All records of a safeguarding nature are forwarded, via CPOMS, to the DSL. The DSL is also verbally informed that they will be receiving an alert.

19.9 Safeguarding records are reviewed regularly to check whether any action or updating is needed. This includes monitoring patterns of complaints or concerns about any individuals and ensuring these are acted upon. Each record on CPOMS has a chronology of significant events. The Designated Safeguarding Lead and her deputy meet weekly to discuss any safeguarding concerns.

19.10 All 'physical' records of a safeguarding nature (for example, those received from social care) are passed to the DSL. These may include case conference or core group minutes; protection plans and written records of any concerns. Once received, they are scanned and added to CPOMS before being securely disposed of.

19.11 Any referrals made to other agencies, including referrals to Social Care, are stored in the student's file on CPOMS.

19.12 The DSL may copy safeguarding records generated by the College prior to transfer and retain for as long as is necessary, 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 or serious case reviews). When the records are no longer required, they will be securely disposed of.

19.13 A record of any allegations (proven) made against staff is kept in a confidential file by the Principal (CPOMS Staff Safe).

19.14 The College holds records in line with the College's records retention schedule.

20 Transfer of Records (Appendix M)

20.1 When students transition in and out of College, their safeguarding records are also transferred. Safeguarding records will be transferred separately from other records and, where possible, these are passed directly to a Designated Safeguarding Lead in the receiving education setting, with any necessary discussion or explanation and to obtain a signed and dated record of the transfer. Records are able to be transferred electronically to other CPOMS enabled setting

20.2 In addition, if the concerns are significant or complex, and/or social services are involved, the DSL will speak to the DSL of the receiving setting and provide information to enable them to have time to make any necessary preparations to ensure the safety of the student.

20.3 In the event of a student moving out of area and a physical handover not being possible then the most secure method should be found to send the confidential records to a named Designated Safeguarding Lead. Files requested by other agencies e.g. the Police, are copied before transfer.

20.4 When the College is the receiving setting, all files are handed to the Designated Safeguarding Lead or the Deputy Designated Safeguarding Lead.

20.5 Sometimes, it may be necessary to share safeguarding information that is stored on CPOMS with other agencies. This may be necessary in order to inform safeguarding conferences or court proceedings. CPOMS has an export facility and this allows a PDF or Excel document to be produced that contains the information required. Information that is not pertinent to the information request is not shared.

21 Training
All staff (including regular volunteers and supply/casual staff)
21.1 When staff join the College, they are informed of the arrangements for safeguarding students. They are given a copy of:
- This policy including its appendices
- The College's safeguarding response to children who are absent from education for prolonged periods and/or repeated occasions
- The student behaviour policy
- Part 1 of Keeping Children Safe in Education 2023

- Annex A of Keeping Children Safe in Education 2023
- 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.

21.2 Through training, all staff are aware of systems within the College which support safeguarding including:
- The Safeguarding Policy
- The Staff Code of Conduct
- The safeguarding response to students who are absent from education for prolonged periods and/or repeated occasions
- The role of the Designated Safeguarding Lead (including the identity of the Designated Safeguarding Lead and any deputies)
- Are aware of the signs and symptoms of abuse and neglect as well as specific safeguarding issues
- Online safety, including an understanding of the expectations, roles and responsibilities for staff around filtering and monitoring
- The early help process and understand their role in it
- How to manage a disclosure from a student

- 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 Designated Safeguarding Lead (or a deputy) and adult's social care. Staff 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
- When and how to record a concern about the welfare of a student
- The process for making referrals to adult's social care
- The government's anti-radicalisation strategy, Prevent, to enable them to identify students at risk of being drawn into terrorism and to challenge extremist ideas
- Advice on safe working practice

21.3 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 to the Police.

21.4 As part of the induction process new staff who start at the College mid-year will access on-line level one safeguarding training.

21.5 This training will be regularly updated and will:

- Be integrated, aligned and considered as part of the whole-college safeguarding approach and wider staff training, and curriculum planning
- Be in line with advice from safeguarding partners
- Have regard to the Teachers' Standards to support the expectation that all teachers:
  - Manage behaviour effectively to ensure a good and safe environment
  - Have a clear understanding of the needs of all students

21.6 Training will generally take the form of yearly face to face training and on-line level one/ universal safeguarding training as necessary. Face-to-Face training will be delivered at the start of each academic year. In addition, all staff receive safeguarding and child protection updates, including online safety, (for example, via email, e-bulletins, staff briefings and staff meetings), as required, to provide them with the relevant skills and knowledge to safeguard students effectively

The DSL and Deputy/Assistants

21.7 The Designated Safeguarding Lead and any deputies/assistants undergo training to provide them with the knowledge and skills required to carry out the role. The training is updated every two years and is provided through a Service Level Agreement (SLA) held with Worcestershire Children First. In addition to their formal training, their knowledge and skills is also updated, for example, via e-bulletins, meeting other designated safeguarding leads, or taking time to read and digest safeguarding developments. This occurs at regular intervals, and at least annually, in order to keep up with any developments relevant to the role.

21.8   They will also undertake Prevent awareness training and any other training (for example, Management of Allegations of Abuse or Domestic Abuse) in order to effectively support all students and staff

21.9   The training provided enables the DSL to:

- 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, especially new and part time staff
- 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 Regulation**
- Understand the importance of information sharing, both within College and with safeguarding partners, 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 online at College
- Can recognise the additional risks that students with SEN and disabilities (SEND) face online, for example, from online bullying, grooming and radicalisation and are confident they have the capability to support SEND 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.

Directors

21.10   All Directors receive training about safeguarding (including online safety) at induction, which is regularly updated. This is to make sure that they:

- Have the knowledge and information needed to perform their functions and understand their responsibilities, such as providing strategic challenge
- Can be assured that safeguarding policies and procedures are effective and support the College to deliver a robust whole-college approach to safeguarding

21.11   As the chair of Directors may be required to act as the 'case manager' in the event that an allegation of abuse is made against the Principal, they receive training in managing allegations for this purpose.

Interview panels (Recruitment)

21.12   At least one person conducting any interview for any post at the College will have undertaken safer recruitment training. This will cover, as a minimum, the contents of Keeping Children Safe in Education, and will be in line with local safeguarding procedures.

21.13   The College reserves the right to carry out online searches on shortlisted candidates. Any concerns or irregularities are explored at interview.

22 Supporting Students

22.1   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.

22.2   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)
- Ensure staff at the College are aware of their obligation to inform the College of any cautions or convictions that arise.
- As Education Safeguarding Practitioners, liaise with the three safeguarding partners in line with Working Together to Safeguard Children 2023

22.3 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

22.4 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 students with disabilities.

22.5 Should the College place a student with an alternative provision provider, it continues to be responsible for the safeguarding of that student and will ensure that it is satisfied that the placement meets the student's needs.

23 Contextualised Safeguarding

23.1 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.

24 Supporting and Supervision of Staff

24.1 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.

24.2 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.

24.3   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.

25 Monitoring and Evaluation

25.1   This policy, including online safety, will be reviewed annually. At every review, it will be approved by the full Board of Directors.

25.2   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 students and their parent carers/advocates
- Discussions with students 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

26 Other Relevant Policies

26.1   The Director's statutory responsibility for safeguarding the welfare of adults at risk goes beyond basic safeguarding procedures. 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
- Student Behaviour, Peer on Peer Abuse & Liberty Safeguarding
- Restrictive Physical Interventions Policy
- Positive Touch
- Mental Capacity & Consent
- Manual Handling
- Educational Trips and Residential Visits
- Work Related Learning
- Medical Interventions
- Health and Safety
- Intimate Care
- Relationships and Sex Education and Health (RSE&H) Policy
- Equality, Diversity and Inclusion Policy
- ICT and Internet Acceptable Use
- Whistleblowing (Confidential Reporting)

Appendices

a) DSL Roles & Responsibilities

b) Signs and symptoms of abuse

c) Sexual Exploitation

d) Criminal Exploitation/County Lines

e) Effects of Domestic Abuse on Adults At Risk

f) Female Genital Mutilation

g) Forced Marriage

h) Radicalisation and Extremism

i) Peer on Peer Abuse (Often referred to Child on Child in school settings), Sexual Harassment and Sexual Violence Guidelines

j) Students with a Disability

k) Online Safety

l) Allegations or complaints made against a member of Staff or Volunteer

m) Transfer Record Sheet

Appendix A – The Role of the Designated Safeguarding Lead

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 adults at risk. They will also advise and support other members of staff on student welfare 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 (or, in exceptional circumstances, her deputy) 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 if necessary.

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

Duties and Responsibilities
Managing Referrals

- Refer cases of suspected abuse to the local authority adult's social care

- Support staff who make referrals to local authority adult's 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 child or young person

- 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 members' 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 for any protection concerns in all cases where a member of 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 Deputy DSL

- Understand the assessment process for providing early help and intervention

- Have a good working knowledge of how local authorities conduct Initial and Protection Conferences and Core Group Meetings

- Attend and contribute to Protection Conferences effectively 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 Designated Safeguarding Lead

- Undergo Prevent training and be able to:

- o Support the college in meeting the requirements of the Prevent duty
- o Provide advice and support to staff on protecting students from the risk of radicalisation
- Undergo training on female genital mutilation (FGM) and be able to:
  - o Provide advice and support to staff on protecting and identifying children and young adults at risk of FGM
  - o 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 Governing Body 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 parents have read the safeguarding policy, and are aware that referrals about suspected abuse or neglect may be made, and the role of the college in this
- Link with Worcestershire Adult's Safeguarding Board to 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 Chadsgrove, 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 provision 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 Board
- 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 postholder may be required to do other duties appropriate to the level of the role.

In the absence of the DSL the Deputy DSL would fulfill the role of the DSL

Appendix B - 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. Harm cam include ill treatment that is not physical as well as the impact of witnessing the ill treatment of others. This can be particularly relevant, for example, in relation to the impact on young people of all forms of domestic abuse, including where they see, hear or experience its effects. 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. They may be abused by an adult or adults, or a peer.

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-depreciation ('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
- A young person who has 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 C - Sexual Exploitation

Sexual exploitation is a form of abuse which involves individuals (male, female or non-binary, 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 D –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 E - 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: [Worcestershire Domestic Abuse](#)
- 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 F –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 Leoni, 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 urinal 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 urinal 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' (Published October 2015, updated December 2016).

The following is a useful summary of the FGM mandatory reporting duty: FGM Fact Sheet.

<p style="text-align: center;">Appendix G – Forced Marriage</p>

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: fmu@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 H - 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 Prevent Lead in the first instance. The Prevent Lead 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 Prevent Lead 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 Prevent Lead 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 I – Peer on Peer Abuse (Often referred to Child on Child in school settings), 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 LGBTQ+ 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"
- 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
- Non-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 a DDSL).

In line with managing internally, the College may decide that the students involved do not require a referral to statutory services but may benefit from early help. Early help is support for students that improves a family's resilience and outcomes or reduces the chances of a problem getting worse. Providing early help is more effective in promoting the welfare of students. Early help can be particularly useful to address non-violent HSB and may prevent escalation of sexual violence.

More information on early help is set out in Working together to safeguard children

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 J - 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 K - 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 students 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 students 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 L -
CHADSGROVE EDUCATIONAL TRUST SPECIALIST COLLEGE
<u>**Checklist for handling and recording allegations or complaints made against a member of staff or volunteer**</u>

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):.................……………..

   ....……………

   ....……………

   ....……………

   ....……………

   ....……………

   ....……………

   ....……………

9. Other relevant information:...……………

   ....……………

   ....……………

   ....……………

   ....……………

   ....……………

10. LADO/DASM contacted: Yes [ ]   Date: ....…………   No [ ]

11. In no, reason why not ………………………………………………………………………

....……………

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

....……………

....……………

....……………

....……………

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 M Transfer of Records

Student Safeguarding Record
Transfer Receipt

Student's Name	
Date of Birth	
Home Address	
Receiving Educational Setting	
Address	

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

Signed on behalf of Chadsgrove Educational Trust Specialist College

Print Name:

Date:

I confirm receipt of young person safeguarding records in respect of the above named students

Signed on behalf of receiving setting:

Print name:

Date:

Please copy and retain the original at Chadsgrove Educational Trust Specialist College

Appendix N - Chadsgrove Educational Trust Specialist College
Form 1
Logging a concern about a student's safety and welfare – contracted staff and visitors

Student Name:	Date of Birth:	Log Number: (Office Use Only)
Date concern/incident noted:		Time:
Name of person completing the form:	Position:	Signature:

Record the concern. Make sure you note **who** was involved, **what** happened, **where** and **when** it happened.
Why does the information recorded above cause you to be concerned?
Any other information (e.g. Witnesses or immediate action taken)
Who have you shared this information with?

Check to make sure your report reads clearly and can also be understood by anyone who may need to read it in the future

PLEASE PASS THIS FORM TO THE DESIGNATED SAFEGUARDING LEAD
(Deb Rattley or, in her absence, Bec Gayden)