



**Buckinghamshire
College Group**

Safeguarding, Child Protection and Vulnerable Adults Policy 2021-22

Designated Senior Lead:	Helen Sisk, Head of Student Services
Link Governor for Safeguarding:	David Bainton
Responsible Officer:	Head of Student Services
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Contacts

College contacts

- Karen Mitchell, Principal and Chief Executive
- Helen Sisk, Head of Student Services, email: hsisk@buckscollegigroup.ac.uk
- Nominated Safeguarding Governor: David Bainton
- Chair of Governors: Max Hailey

Contacts in County

- Education Safeguarding Advisory Service 01296 382 912
- Education Safeguarding Advisor 01296 382 732
- First Response Team 01296 383 962
- Safeguarding Adults Team 0800 137 915
- Safeguarding Adults Out of Hours 0800 999 7677
- Local Authority Designated Officer (LADO): 01296 382 070
- RU Safe? (Barnardos - Child Sexual Exploitation Service) 01494 461 112
- Children's Services, Out of Hours: 0800 999 7677
- BCC Equalities & College Improvement Manager 01296 382461
- BCC Prevent Co-ordinator 01296 674784
- Thames Valley Police 101 (999 in case of emergency)
- [Buckinghamshire Safeguarding Children Partnership](#) (click on web link)
for procedures, policies and practice guidelines
- [Bucks Family Information Service](#) 0845 688 4944
- [Colleges Web](#)
College bulletin, Safeguarding links, A-Z guide to information and services

Other contacts

- NSPCC 0800 800 5000
- ChildLine 0800 11 11
- Kidscape Bullying Helpline 0845 1205 204
- Female Genital Mutilation 0800 028 3550
email: fgmhelp@nspcc.org.uk
- Samaritans 0845 790 9090
- [CEOP](#) (Child Exploitation and Online Protection) (click on web link)
- Foreign and Commonwealth Office
(Forced Marriages Section) 0207 008 0151
- Crimestoppers 0800 555 111

Introduction

This Policy deals with the protection and safeguarding of all children, vulnerable adults and any students at Buckinghamshire College Group and as such, all members of the College community as described below will have access to this document and the procedures herein:

- Buckinghamshire College Group employees
- All students
- Governors
- Volunteers
- Visitors to Buckinghamshire College Group
- Contractors working at Buckinghamshire College Group
- Any person or persons hiring out areas of Buckinghamshire College Group
- Buckinghamshire College Group Nursery employees
- Life Skills Centre and Future Life Skills Centre employees
- Subcontracted provision

This Policy has been developed in accordance with the principles established by the Children Acts 1989 and 2004 and in response to guidance issued on the protection of adults considered vulnerable in the DfES/NIACE publication 'Safer Practice, Safer Learning' 2007 and in line with the following:

- Keeping Children Safe in Education – statutory guidance for schools and further education colleges Sep 2021;
- Working Together to Safeguard Children 2018;
- The Care Act 2014
- Safeguarding Vulnerable Groups Act 2006
- Mental Capacity Act 2005
- Buckinghamshire Multi-Agency Information sharing for Children, Young People & Families – Code of Practice for sharing personal information, August 2017;
- Local Safeguarding Children's Partnership guidance.
<https://www.buckssafeguarding.org.uk/childrenpartnership/>;
- We will follow procedures set out by the Local Safeguarding Children's Partnership including Early Help and Continuum of Need Threshold intervention;
- Children Missing Education; Statutory Guidance for Local Authorities Sept 2016;
- Statutory Guidance issued under section 29 of the Counter Terrorism and Security Act 2015;
- Sexual Violence and Sexual Harassment between Children – Sep 2021;
- Serious Crimes Act 2015;
- The Equality Act 2010;
- The United Nations Convention on the Rights of the Child (UNCRC);
- We will take account of further guidance issued by the Department for Education and the local authority.

We believe clear governance and leadership is central to imbedding a safeguarding culture. The Governing Body takes seriously its responsibility under section 175 of the Education Act 2011 to safeguard¹ and promote the welfare of children; and to work together with other agencies to ensure adequate arrangements are in place within our College to identify, assess, and support those children who are suffering harm or whose welfare may be in question. Governors will ensure all staff at the College have read and understood their responsibilities pertaining to Part 1, Part 5 and Annex A of Keeping Children Safe in Education Sept 2021 and have an auditable

¹ Safeguarding (as defined in the Joint Inspector's Safeguarding report is taken to mean "All agencies working with children, young people and their families take all reasonable measures to ensure that the risk of harm to children's welfare are minimised" and "where there are concerns about children and young people's welfare, all agencies take all appropriate actions to address those concerns, working to agree local policies and procedures in full partnership with other agencies"

system in place to evidence this. In addition, all staff are required to read and adhere to the Staff Code of Conduct which governs behaviours expected of them as well as having an understanding of the Student Code of Conduct and our Attendance Policy.

We recognise all staff² and Governors have a full and active part to play in protecting our students from harm and actively promoting their welfare and that the students' welfare is our paramount concern.

All staff believe our College should provide a safe, caring, positive and stimulating environment that promotes the social, physical and moral development of the individual student.

The College recognises that as well as threats to the welfare of students from within their families, students may be vulnerable to abuse or exploitation outside their homes and from other students. Staff will remain vigilant and alert to these potential risks.

We have a Designated Safeguarding Lead (DSL), a member of the Senior Leadership Team, who has undertaken appropriate training for the role, as recommended by the Buckinghamshire Children Safeguarding Partnership. The Head of Student Services (DSL) oversees the team of DSLs that cover all campuses.

The aims of this Policy are:

- To protect students from maltreatment
- Prevent impairment of their mental and physical health or development
- Ensure that they grow up in circumstances with the provision of safe and effective care
- Take action to enable all students to have the best outcomes
- To support students' development in ways that will foster security, confidence and resilience, free from discrimination
- To provide an environment in which students feel safe, secure, valued and respected and feel confident that they know who to approach if they are in difficulties
- To ensure all teaching and non-teaching staff are aware of the need to safeguard and promote the wellbeing of students, identifying the need for early support to promote wellbeing and prompt reporting of cases of actual or suspected abuse
- To provide a systematic means of monitoring students known or thought to be at risk of harm and ensure we, the College, contribute to assessments of need and support plans for those students
- To acknowledge the need for effective and appropriate communication ensuring staff know how and when to share information to protect students in a way that is legal and ethical
- To ensure our College has a clear system for communicating concerns and a model for open communication between students, teachers, parents and other adults working with our students
- To underpin a structured procedure within the College, which will be followed by all members of the College community in cases of suspected abuse and their responsibility for referring any concerns to the Campus Safeguarding and Prevent Officer and Head of Student Services
- To ensure the College has robust systems in place which accurately records safeguarding and child protection concerns, which are clearly understood by staff and adhered to. Actions taken to address concerns and outcomes achieved are clearly and accurately recorded and these records are appropriately stored
- To develop effective working relationships, guided by the Continuum of Need Threshold document <https://www.buckssafeguarding.org.uk/childrenpartnership/professionals/continuum-of-need/> with all other agencies involved in safeguarding and promoting the needs of students at our College

² "Staff" covers ALL adult staff on site, including temporary, supply and ancillary staff, and volunteers working with children

- To ensure that all staff appointed within our College have been through the safer recruitment process and understand the principles of safer working practices as set out in our Staff Code of Conduct, which stipulates their duty to challenge and report where behaviours of colleagues may have stepped outside of agreed safe practices. All staff must work to develop a positive culture of safeguarding with our College.
- To provide clarity to other community users of our facilities with regard to our expectations of how they should maintain a safe environment which supports students' welfare and development. We reserve the right to decline access to use College facilities where we believe their ethos or practice is not aligned with this Policy.
- This Policy is published on our website and hard copies are available upon request.

Responsibilities

All staff understand safeguarding children is **everyone's responsibility**. Any member of staff, volunteer or visitor to the College who receives a disclosure of abuse, an allegation or suspects that abuse may have occurred will report it immediately to the Campus Safeguarding and Prevent Officer and in their absence, the Head of Student Services. In the absence of either of the above, concerns should be brought to the attention of the most senior member of staff on site. Staff understand if there is an immediate risk of harm then they should call the Police or First Response directly and update the Designated Safeguarding Lead (DSL) at the earliest opportunity. See flow chart attached (Appendix Two).

- Staff must maintain a good working knowledge of the Buckinghamshire Continuum of Need Threshold Document and any updates, how it can be used to safeguard and promote the wellbeing of students and how it should be used to inform decision making regarding a referral to First Response as soon as there is a significant concern.
- Staff understand that the most common reason for children becoming looked after is as a result of abuse and/or neglect and that previously looked after children remain vulnerable. Staff have the skills, knowledge and understanding to keep both looked after children and previously looked after children safe.
- Staff understand increased vulnerability and that barriers exist when recognising abuse and neglect for children with Special Educational Needs or Disabilities.

The Governing Body understands and fulfils its safeguarding responsibilities. It will:

- Ensure that the Principal and DSLs create and maintain a strong, positive culture of safeguarding within the College including culture of zero tolerance approach to abuse..
- Ensure the Safeguarding, Child Protection and Vulnerable Adults Policy reflects the unique features of the community it serves and the needs of the students attending its provision. This will be reviewed at least annually
- Monitor and evaluate the effectiveness of the Policy and be satisfied that it is being complied with.
- Appoint a Designated Safeguarding Lead (DSL) and deputies who are senior members of staff within the leadership team with the required level of authority. The roles and responsibilities of the DSL and deputy DSL are made explicit in those post-holders' job descriptions.
- Recognise the importance of the role of the DSL, ensuring s/he has sufficient time, training skills and resources, as necessary to be effective. Refresher training must be attended every 2 years, in addition knowledge and skills must be refreshed at regular intervals, at least annually.
- Ensure measures are in place for the governing body to have oversight of how the College's delivery against its safeguarding responsibilities are exercised and evidenced.
- Ensure robust structures are in place to challenge the Principal where there are any identified gaps in practice or where procedures may not have been followed.
- Recognise the contribution the College can make to helping students and young people keep safe, through incorporation of safeguarding within the curriculum and tutorial programme.

- Ensure safe and effective recruitment policies and disciplinary procedures are in place, which adhere to *Keeping Children Safe in Education (KCSiE 2021)* and legislation referred to therein.
- Ensure the needs and voice of the students for early intervention and Child Protection are fully understood and resources allocated to meet identified needs.
- Support the Head of Student Services to complete an Annual Safeguarding Report for Governors, demonstrating how the College is meeting its statutory responsibilities for safeguarding and promoting the welfare of students, ensuring a copy of this report is shared with the Education Safeguarding Advisory Service within the recommended timeframe.
- As we work increasingly more online, Governors must ensure appropriate filters and appropriate monitoring systems are in place.
- Ensure that staff undergo regular updated safeguarding training, including online safety and have regard to the Teacher's Standards.
- Understand its responsibility under Ofsted's Education Inspection Framework.
- Ensure they have clear systems and processes in place for identifying possible mental health problems, including routes to escalate and clear referral and accountability systems.
- Ensure that staff have the skills, knowledge and understanding to keep looked after children safe. In particular they should ensure that appropriate staff have the information they need in relation to a child's looked after status.

It will be the duty of the Chair of Governors, Max Hailey, to liaise with relevant agencies if any allegations are made against the Principal. If there are concerns that issues are not being progressed in an expedient manner, staff/student/parents should escalate concerns directly to the Local Authority Designated Officer (LADO tel; 01296 382 070).

The Nominated Governor for Safeguarding will be familiar with Buckinghamshire Children Safeguarding Partnership procedures, Local Authority procedures and guidance issued by the Department for Education.

The Nominated Governor will:

- Work with the DSL (SLT) to produce the Safeguarding, Child Protection and Vulnerable Adults Policy.
- Undertake the training available for Nominated Governors.
- Ensure Safeguarding is, as a minimum, an annual agenda item for the Governing Body.
- Meet regularly with the DSL (SLT) to review and monitor the College's delivery on its safeguarding responsibilities.
- Ensure relevant staff have due regard to the relevant data protection principles, which allow them to share (and withhold) personal information, as provided for in the Data Protection Act 2018 and the GDPR. This includes:

Being confident of the processing conditions which allow them to store and share information for safeguarding purposes, including information which is sensitive and personal, and should be treated as 'special category personal data'

Understanding that 'safeguarding of children and 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 a good reason to do so, and that the sharing of information will enhance the safeguarding of a child in a timely manner but it is not possible to gain consent, it cannot be reasonably expected that a practitioner gains consent, or if consent would place a child at risk.

For colleges, not providing pupil's personal data where a serious risk to harm test under the legislation is met. For example, in a situation where a child is in a refuge or other form of emergency accommodation, and the serious harm test is met, they must withhold

providing the data in compliance with school's obligations under the Data Protection Act 2018 and the GDPR. Where in doubt colleges should seek independent legal advice.

The Data Protection Act 2018 and GDPR do not prevent the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to safeguarding and promote the welfare and protect the safety of children. For further information refer to the Data Protection toolkit for schools

Further details on information sharing can be found:

- in Chapter one of [Working Together to Safeguard Children](#), which includes a myth-busting guide to information sharing
- at [Information Sharing: Advice for Practitioners Providing Safeguarding Services to Children, Young People, Parents and Carers](#). The seven golden rules for sharing information will be especially useful
- at [The Information Commissioner's Office](#) (ICO), which includes ICO GDPR FAQs and guidance from the department
- in [Data protection: toolkit for schools](#) - Guidance to support schools with data protection activity, including compliance with the GDPR.

All governors must complete safeguarding training on appointment, to also include Prevent training.

Overall responsibility for the safeguarding of students remains with the Principal, in addition we have Designated Safeguarding Leads (DSL) at each Campus called Safeguarding and Prevent Officers, along with the Head of Student Services, who are responsible for:

- Creating a culture of safeguarding where students are protected from harm. Ensuring students receive the right help at the right time using the Continuum of Need Threshold Document <https://www.buckssafeguarding.org.uk/childrenpartnership/professionals/continuum-of-need/> to inform plans for support or protection (see Appendix One for definitions of the categories of abuse);
- Ensuring referrals to partner agencies are followed up in writing, within 24 hrs of initial contact;
- Recording and storing information about child protection concerns and outcomes achieved, enabling records to be reviewed and an overview gained, to support timely interventions and allowing prompt follow up, if it is felt the needs of the student are not being met. This includes use of the Escalation Process found on the BSCP website;
- Ensuring records are up to date and staff are supported to differentiate between fact / opinion / hearsay and are maintained in accordance with data protection;
- Ensuring records are stored safely and securely and remain confidential. The DSL will share information on a 'need to know' basis only. All child protection files are held separately from student records on CPOMS;
- Creating a culture of safeguarding and vigilance within the College, beginning with ensuring all staff receive an appropriate level of induction and training to support them to be professionally curious, to question behaviours and to "think the unthinkable" if they have concerns for a student;
- Ensuring that the College's most up to date Safeguarding Policy is widely available, publishing other relevant information on the College's website. Ensuring that the safeguarding teams contact details and photos are displayed in prominent areas around the College and also on the website.

- Acting as a focal point for staff to be able to discuss and share their concerns, supporting staff to formulate their thinking and be part of planning to address issues raised, liaising with other agencies and professionals to achieve change;
- Being available to staff and outside agencies for consultation and advice on safeguarding concerns raised;
- Ensuring arrangements are in place to support staff outside of these times for example Apprentices and Adult Learners;
- Contributing effectively to multi-agency working for the purpose of safeguarding and promoting the welfare of students, participating in Strategy discussions and attending Child Protection Case Conferences, submitting reports to the conference, which will be shared in advance with the parents. Contributing effectively to core group meetings, or other multi-agency planning meetings and contributing to the Framework for Assessments process; ensuring coverage is available at all times during the year;
- The designated safeguarding lead and any deputies should liaise with the three safeguarding partners and work with other agencies in line with [Working Together to Safeguard Children](#). [NPCC- When to call the police](#) should help designated safeguarding leads understand when they should consider calling the Police and what to expect when they do.
- Providing the Principal with an annual report for the Governing Body, detailing how the College delivers on its safeguarding responsibilities and any child protection issues within the College. The Governing Body will use this report to fulfil its responsibility to provide the LA with information about their Safeguarding policies and procedures.
- Meeting regularly with the Nominated Governor to share oversight of safeguarding provision within the setting, monitor performance and develop plans to rectify any gaps in delivery noted;
- Meeting the statutory requirement to keep up to date with knowledge, enabling them to fulfil their role, including attending relevant training;
- Referring to the Police any cases where a criminal offence may have been committed or risk of harm is imminent;
- Retaining overall responsibility for the safeguarding of students although tasks may be delegated to other members of the safeguarding team at the College.
- The DSLs must have details of children looked after's social worker and the name of the virtual head in the authority that looks after them.

Procedures

Our College procedures for safeguarding and protecting students from harm are in line with Buckinghamshire Council and Buckinghamshire Children's Safeguarding Partnership and Buckinghamshire Safeguarding Adults Board Procedures, "Working Together to Safeguard Children 2018", "Keeping Children Safe in Education" 2021, The Care Act 2014, Safeguarding Vulnerable Groups Act 2006, Mental Capacity Act 2005 and statutory guidance issued under section 29 of the Counter-Terrorism and Security Act 2015.

We will ensure:

- We have a designated member of the Senior Leadership Team, who has undertaken appropriate training for the role, as recommended by BCSP. Our Designated Safeguarding Leads (DSL) will be required to update their training in accordance with the Learning Pathway agreed by the BSCP.
- We have a member of staff who will act in the DSL's absence who has also received training for the role of DSL and who will have been briefed in the role. In the absence of an appropriately trained member of staff, the Principal will assume this role.
- All adults (including agency tutors and volunteers) new to our College, are made aware of the College's policy and procedures for safeguarding and child protection, the name

and contact details of the Campus DSL, their role and responsibilities under Keeping Children Safe in Education 2021

Visitors must be:

Clearly identified with visitor/contractor passes
Met and directed by College staff/representatives
Signed in and out of the College by staff
Given a safeguarding leaflet to read
Given restricted access to only specific areas of College, as appropriate
Escorted by a member of staff/representative as required

- All members of staff are required to attend annual training opportunities arranged or delivered by the Campus DSL, in order to develop their understanding of the signs and indicators of abuse, how to respond to a student who discloses abuse and the procedure to be followed to promote a young person's welfare. Staff are supported to further develop their understanding as mechanisms are in place to enhance this via team meetings, newsletters and email updates. Updates must be cascaded to all staff throughout the year, at a minimum of once a year.
- All parents/carers are made aware of the College's responsibilities in regard to safeguarding and child protection procedures through this Policy which is available on our website.
- All staff must follow the reporting procedures as follows when reporting any child protection concerns.
- Staff will ensure the student is in a safe place and in receipt of support should this be needed.
- Staff will initially make a verbal report to the DSL to alert them to the safeguarding/child protection concern arising.
- Staff will then follow this up, making a written report using the College referral records.
- All concern forms/emails will be sent to the Campus Safeguarding and Prevent Officer and uploaded to CPOMS;
- Staff will ensure the **time and date** of the incident is recorded.
- A factual account of the incident **who** was involved, **what** was said/seen/heard, **where** the incident took place and any preceding information which may have prompted the event.
- Use a body map to record any injuries seen or reported by the student.
- Staff will sign and date the report giving details of their role within the College.
- The DSL will record when the report was passed to them and what action was taken alongside any outcomes achieved on CPOMS.
- Through our Attendance Policy, we have in place a robust system for monitoring attendance and will act to address absenteeism with parents and students promptly to effect change and identify any safeguarding issues arising.
- All children and young people attending our College are required to have a minimum of two identified emergency contacts. This is to support prompt communication in the event of a serious incident or a student missing from College.
- Any Under 18 student absent for ten College days, where it has not been possible to make contact with a parent/carers, will be reported as a Child Missing in Education using the CME Protocol.
- Any absence of two consecutive College days, without satisfactory explanation, of an Under 18 student currently subject to a child protection plan is immediately referred to their social worker.
- Students must inform College if there are any changes to where they will be living. College has a mandatory duty to inform the local authority via the First Response Team, if a child under the age of 16 yrs, lives with someone other than their parent, step-parent, aunt, uncle or grandparent for a period of more than 28 days. This is defined as being a private fostering arrangement.

- Our Commercial Bookings Procedure reflects the ongoing responsibility the College has for safeguarding those using the site outside of normal College hours, ensuring the suitability of adults working on College sites at any time. This includes the purpose of the letting when for religious or political reasons.
- The College operates Safe Recruitment practices including ascertaining the suitability of employed staff and volunteers in regulated activities. Checks will be made through the Disclosure and Barring Service.
- We apply the same level of scrutiny to staff employed via an agency, ensuring their identities, qualification and suitability to work safely with students.
- Allegations against members of staff are referred to the Local Authority Designated Officer (LADO). There are procedures in place to make a referral to the Disclosure and Barring Service (DBS) if a person in regulated activity has been dismissed or removed due to safeguarding concerns or would have been had they not resigned. The College recognises that this is a legal duty and a failure to refer when the criteria are met is a criminal offence.
- Our procedures are reviewed and updated annually as a minimum.
- The names of all the DSLs are clearly displayed around the College sites in appropriate locations.

Retention of Records

When a disclosure of abuse, or an allegation against a member of staff or volunteer, has been made, our College will have a record of this. These records will be maintained in a way that is confidential and secure, in accordance with our **Record Keeping Policy** and **Data Protection Legislation**.

There is a statutory requirement for our College to pass any safeguarding and child protection records to the student's next educational establishment. We are required to have an auditable system in place to evidence we have done so. Any transfer of records will be carried out using a secure method and will be sent separately to the student's general file.

The last statutory educational establishment maintains child protection files until a student reaches the age of 25 years, therefore if the transfer establishment is unknown, or a student is going to be electively home educated, any child protection files will remain at our College in a secure location. Child protection files will only be destroyed when the student reaches their 25th birthday.

We have a robust system for reviewing our archived information held. Our files are stored and disposed on in line with GDPR protocols.

Confidentiality

We recognise that all matters relating to child protection are confidential. The Principal or Designated Safeguarding Leads must only disclose personal information about a student to other members of staff on a need to know basis only.

Staff must not keep duplicate or personal records of child protection concerns. All information will be reported to the Designated Safeguarding Leads and securely stored on CPOMS, separate from the student's records.

All staff are aware they cannot promise a student to keep secrets which might compromise their safety or well-being or that of another as they have a duty to share. Staff must, however, reassure the student that information will only be shared with those people who will be able to help them and therefore need to know.

We will always undertake to share our intention to refer a young person to Social Care (First Response) with their parents/carers, unless to do so could put them at greater risk of harm or

impede a criminal investigation. If in doubt, we will consult with First Response on this point. We recognise that GDPR must not be a barrier for sharing information regarding safeguarding concerns.

Dealing with a Disclosure

In the event of a student disclosing abuse staff will;

- Listen to the student, allowing them to tell what has happened in their own way, and at their own pace. Staff must not interrupt a student who is freely recalling significant events.
- Remain calm. Be reassuring and supportive but will endeavour to not respond emotionally.
- Not ask leading questions. Staff are reminded to ask questions only when seeking clarification about something the student may have said. Staff are trained to use TED; Tell, Explain, Describe.
- Make an accurate record of what they have seen/heard using the College's referral form, keeping processes, recording; times, dates or locations mentioned, using as many words and expressions used by the student as possible. Staff must not substitute anatomically correct names for body part names used by the student.
- Reassure the student that they did the right thing in telling someone.
- Staff must explain to the student what will happen next and the need for the information to be shared with the Campus Safeguarding and Prevent Officer.
- In the unlikely event the Campus Safeguarding and Prevent Officer and Head of Student Services not being available, staff are aware they must ring First Response for advice with support from the most senior member of staff on campus.

If there is immediate risk of harm to a student Staff will NOT DELAY, and will ring 999

- The student will be monitored/accompanied at all times following a disclosure, until a plan is agreed as to how best they can be safeguarded.
- The student will be monitored/accompanied at all times following a disclosure, until a plan is agreed as to how they can best be safeguarded.

Following a report of concerns the DSL must:

- Decide whether there are sufficient grounds for suspecting harm, in which case a referral must be made to First Response and the Police if it is appropriate. The rationale for this decision should be recorded by the DSL.
- Normally the College should try and discuss any concerns about a student's welfare with parents/carers and where possible obtain consent before making a referral to First Response. However, in accordance with DfE guidance, this should only be done when it will not place the student at increased risk or could impact a Police investigation. Where there are doubts or reservations about involving the student's family, the DSL should clarify with First Response or the Police whether the parents/carers should be told about the referral and, if so, when and by whom. This is important in cases where the Police may need to conduct a criminal investigation. The student's views should also be taken into account.

If there are grounds to suspect a student is suffering or is likely to suffer significant harm, the DSL must contact First Response by telephone in the first instance and then complete the Multi Agency Referral Form (MARF) making a clear statement of:

- The known facts
- Any suspicions or allegations
- Whether or not there has been any contact with the student's family.

If the student is in immediate danger and urgent protective action is required, the Police must be called. The DSL must then notify First Response of the occurrence and what action has been taken.

If a student needs urgent medical attention, the DSL should call an ambulance via 999. DSL to contact First Response; advice to be sought from First Response about informing parents/carers.

Multi-agency Working

Schools and Colleges have a pivotal role to play in multi-agency safeguarding arrangements. Governing bodies and proprietors should ensure that the College contributes to multi-agency working in line with statutory guidance Working Together to Safeguard Children.

New safeguarding partners and child death review partner arrangements are now in place.

Locally, the three safeguarding partners (the local authority; a clinical commissioning group for an area within the local authority; and the Chief Officer of Police for an area (any part of which falls within the local authority area) will make arrangements to work together with appropriate relevant agencies to safeguard and promote the welfare of local children, including identifying and responding to their needs.

It is especially important that colleges understand their role in the three safeguarding partner arrangements. Governing bodies and proprietors and their senior leadership teams, especially their designated safeguarding leads, should make themselves aware of and follow their local arrangements.

The three safeguarding partners have a shared and equal duty to work together to safeguard and promote the welfare of children. To fulfil this role they must set out how they will work together and with any relevant agencies.

Relevant agencies are those organisations and agencies whose involvement that the three safeguarding partners consider may be required to safeguard and promote the welfare of children with regard to local need. The three safeguarding partners will have set out in their published arrangements which organisations and agencies they will be working with and the expectations placed on any agencies and organisations by the arrangements.

The three safeguarding partners should make arrangements to allow all colleges in the local area to be fully engaged, involved and included in safeguarding arrangements. It is expected that, locally, the three safeguarding partners will name schools and colleges as relevant agencies and will reach their own conclusions on the best way to achieve the active engagement with individual institutions in a meaningful way.

Supporting Staff

We recognise 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.

We will support such staff by providing an opportunity to talk through their anxieties with the Campus Safeguarding and Prevent Officer, receive supervision and to seek further support if necessary from HR.

Our Code of Conduct forms part of staff induction which details advice on the boundaries of appropriate behaviour in order to define and underpin the safe working practices adhered to within our College.

All staff are required to sign that they have read, understood and agree to comply with the agreed standards of practice set out in the staff Code of Conduct.

We recognise that our DSL(s) should have access to support as above and appropriate workshops, courses or Forums as organised by the County Council.

Allegations Against Staff including agency staff and volunteers (including Governors)

Allegations that may meet the harms threshold

This guidance is about managing cases of allegations that might indicate a person would pose a risk of harm if they continue to work in regular or close contact with children in their present position, or in any capacity with children in a school or college. This guidance should be followed where it is alleged that anyone working in a school or college that provides education for children under 18 years of age, including supply teachers and volunteers has:

- Behaved in a way that has harmed a child, or may have harmed a child;
- Possibly committed a criminal offence against or related to a child;
- Behaved in a way towards a child or children in a way that indicates he or she may pose a risk of harm to children;
- Or behaved in a way that indicates they may not be suitable to work with children.

The harm test is explained on the Disclosure and Barring service website on GOV.UK.

All College staff should take care not to place themselves in a vulnerable position with a student. It is always advisable for interviews or work with individual students or parents/carers to be conducted in views of other adults. There must be no 1:1 contact between staff and students which is not “open to the casual observer”.

We understand that a student may make an allegation against a member of staff. If such an allegation is made, the member of staff notified of the allegation will immediately inform the Head of Student Services or the Executive Director Human Resources or the most senior member of staff available at the campus if neither are available. Allegations against a teacher who is no longer teaching should be referred to the Police. Historical allegations of abuse should be referred to the Police.

The notified member of staff above on all occasions should immediately notify the Head of Student Services and Executive Director Human Resources who will contact the Local Authority Designated Officer (LADO). The purpose of an initial discussion is for the LADO and the Executive Director to consider the nature, content and context of the allegation and agree a course of action.

The Executive Director will;

- Follow all advice given by the LADO throughout the investigation process, including how to manage the staff member or volunteer against whom the allegation is made, as well as supporting other staff and volunteers within the workplace
- Follow all advice given by the LADO relating to supporting the student making the allegation, as well as other students and young people connected to the College
- Ensure feedback is provided to the LADO about the outcome of any internal investigations within the College.

If the allegation made to a member of staff concerns the Principal, the person receiving the allegation will immediately inform the Chair of Governors who will consult the LADO as above without notifying the Principal first.

The College will follow the College Disciplinary Policy for managing allegations against staff and volunteers.

Allegations that do not meet the harms threshold

Allegations that do not meet the harms threshold are called ‘low-level concerns’.

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

- Is inconsistent with the staff code of conduct, including inappropriate conduct outside of work, and
- Does not meet the allegations threshold or is otherwise not considered 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 phones
- Engaging with a student on a one-to-one basis in a secluded area or behind a closed door or
- Using inappropriate sexualised, intimidating or offensive language

We understand that a student may make an allegation against a member of staff. If such an allegation is made, the member of staff notified of the allegation will immediately inform the Head of Student Services or the Executive Director Human Resources or the most senior member of staff available at the campus if neither are available.

The Head of Student Services and Executive Director Human Resources will speak directly to the person who raised the concern, to any individuals and witnesses. The information collected will help them to categorise the type of behaviour and determine what further action may need to be taken following the College Disciplinary Policy.

Our lettings agreement for other users requires that the organiser will follow the Buckinghamshire Council procedures for managing the allegations against staff and where necessary, the suspension of adults from College premises.

Transfer of Risk

Should an individual staff member or volunteer be involved in child protection, other safeguarding procedures or Police investigations in relation to abuse or neglect, they must inform the Executive Director Human Resources. In these circumstances, the College will need to assess whether there is any potential for risk of transfer to the workplace and the individual's own work with students or vulnerable people.

Whistleblowing

We recognise that students cannot be expected to raise concerns in an environment where staff fail to do so. For this reason, we have a separate Whistleblowing Policy which can be found on the intranet and website. Staff are required to familiarise themselves with this document during their induction period.

All staff are aware of their duty to raise concerns about the attitude or actions of colleagues. If necessary, they should speak to the designated 'Whistleblowing' Governor or the Local Authority Designated Officer (LADO).

Physical Intervention / Positive Handling

Our Policy on physical intervention / positive handling by staff is set out separately, as part of our Disciplinary/Behaviour Policy. It complies with the Department for Education Guidance, 'The Use of Reasonable Force, Advice for Head Teachers, Staff and Governing Bodies' July 2013. This Policy states that staff may only use 'reasonable force', meaning no more force than is needed, to prevent pupils from hurting themselves or others, from damaging property, or from causing disorder. It is always unlawful to use force as a punishment.

Authorised staff can use such force as is reasonable in the circumstances to conduct a search for the following 'prohibited items'; knives and weapons, alcohol, illegal drugs, stolen items, cigarettes and tobacco, fireworks, pornographic images, or any article that has been or is likely to be used to commit an offence, cause personal injury or damage property.

If the use of force is necessary, reasonable adjustments for disabled students and students with special educational needs will be made.

Any use of force or restraint will be recorded and signed by a witness. The parent/carer will be informed of the incident.

Staff who are likely to need to use physical intervention must be appropriately trained.

We understand that physical intervention of a nature which causes injury or unnecessary distress to a child or young person may be considered under child protection or disciplinary procedures.

Anti-Bullying

At our College, we have an agreed definition of bullying which is "*Bully is a person who habitually seeks to harm or intimidate those whom they perceive as vulnerable*", students, staff, parents and carers are supported to understand this definition.

We have an Anti-Bullying Policy and measures in place to prevent and respond to all forms of bullying, which acknowledges that to allow or condone bullying may lead to consideration under child protection procedures.

This Policy is available to all staff, parents and carers and students.

Staff, students and parents are made aware of how mobile technologies are increasingly being used to bully young people both in and outside of the College environment. Cyber bullying is therefore referenced within our E-Safety Policy.

Discriminatory Incidents

Our Equalities, Diversity and Inclusion Policy references how racist incidents will be dealt with and acknowledges the serious nature of these events and their impact on the individual/group of students involved including those who may witness the incident. All incidents will be taken seriously and consideration will be given as to whether a multi-agency approach using child protection procedures is required.

Health and Safety – Under 16 Students

Under 16 pupils who leave the site during the College day do so only with the written permission of their parent/carer. In the event of a student going missing during the course of the College day we will carry out immediate checks to ensure the student is not on site, staff will then make contact with the student's parents/carers and if necessary inform the Police.

Prevention

We recognise College plays a significant part in the prevention of harm to our students by providing effective lines of communication with trusted adults, supportive friends and an ethos of protection. We include within this the emotional wellbeing of our students and recognise the role College plays in identifying vulnerability and preventing the political indoctrination of students either by self-radicalisation or through exposure to extremist views.

We are aware of the Prevent Duty to protect young people from radicalisation and extremism. At our College we view this as a safeguarding matter like any other and these processes will be applied to support children and their families where vulnerabilities are identified, invariably this will require us to work with partner agencies to support and protect the vulnerable student.

Concerns regarding the conduct or behaviour of a student, where it is believed they are vulnerable to extremism, will follow the same process of reporting as with any other safeguarding concern. A referral will be made to the First Response Team and passed by them to the Channel coordinator.

All College staff are required to attend training to support them to identify a range of safeguarding and child protection matters, helping them to recognise and respond appropriately should concerns arise, supporting them to act on or escalate concerns.

Whilst a central part of our work with students is to support them to stay safe whilst on-line, we also have in place appropriate web filtering systems so that young people cannot view potentially extreme material, which we also monitor.

We recognise some students, because of their life experiences or additional needs including Special Educational Needs, may be disproportionately affected by the behaviours of their peers or vulnerable to the influence of others. We will work in partnership with colleagues in other agencies to promote the wellbeing of this cohort of students.

The College community will therefore:

- Establish and maintain a safeguarding ethos, which is understood by all staff, enabling students to feel secure. Ensuring all students know there are staff in College whom they can approach if they are worried or in difficulty.
- Receive focused annual training to support learning and understanding of the changing landscape of safeguarding which is underpinned by legislation and includes issues such as FGM, themes of exploitation and management of sexual violence and sexual harassment.
- Understand safeguarding and protection of students has to be viewed within the context of the students' lived experience and the factors around them which may impact on this; friends, family, College and their community.
- Provide, across the curriculum and through tutorials, opportunities which equip students with the skills they need to stay safe from both physical and emotional harm and to know to whom they should turn for help.
- Ensure staff work effectively with partner agencies to seek advice support and guidance, drawing on multi agency expertise, knowledge and experience to support students at risk of harm including emotional and intellectual harm via social media and use of the internet.
- Be sensitive and alert to the possibility of the risk some students' behaviours may pose to their peers. Staff will be supported by the DSL to assess and act on concerns highlighted to ensure College remains a safe place to learn.

Our College will support all students by:

- Encouraging the development of self-esteem, resilience and critical thinking in every aspect of College life including through the curriculum and tutorial programme.
- Promote a caring, safe and positive environment within the College.
- Monitor all absences from College and promptly address concerns about irregular attendance with the parent/carer for those under 18, further information is available in The College Attendance Policy.

- Liaising and working together with all other support services and those agencies involved in the safeguarding of young people and using the expertise and resources of colleagues in other services areas to promote the welfare of students.
- Ensuring staff work with Thames Valley Prevent Officers and the Channel Panel to support and safeguard if a student is thought to be vulnerable to or espousing radical political ideologies.
- Developing a good working knowledge of the Continuum of Need Threshold Document and how it can be used to safeguard and promote the wellbeing of students, informing the notification to Social Care (First Response) as soon as there is a significant concern.
- Ensuring that a named teacher is designated for Children Looked After and that an up to date list of young people who are subject to a Care Order or are accommodated by the County Council is regularly reviewed and updated. We will work with the Virtual Schools Team to support the educational attainment for Children Looked After at our College.
- Staff are sensitive to the needs of students who are “looked after”, recognising they are likely to have encountered difficulties and challenges which may mean they are disproportionately affected by the behaviours of their peers, e.g., teasing, bullying or when negotiating relationships.
- Seeking appropriate advice, support and guidance to enable us to critically evaluate safeguarding information and concerns, and to act on them appropriately.

At our College we work hard to understand the impact on young people of living in families experiencing difficulties relating to mental ill-health and/or substance misuse and/or domestic violence and know that the students might experience abuse or neglect as a result of these difficulties.

Students are encouraged to seek help and support and are provided with information about how to access this, if they are encountering problems at home or elsewhere.

Whilst we strive to work together with families, staff understand that sharing information with parents may not always be appropriate and ensure that decisions of this nature are made in partnership with Children’s Social Care or the Police.

Prevent Duty

We are aware of the Prevent Duty under **Section 26 of the Counter Terrorism and Security Act 2015** to protect young people from being drawn into terrorism. This is as a safeguarding matter like any other and these processes will be applied to support children and their families where vulnerabilities are identified.

All College staff and governors have completed Prevent Training.

We have in place and monitor appropriate web filtering systems so that students cannot view potentially extreme material. Staff understand the need for a culture of vigilance to be present in the College to support safeguarding. This includes awareness and sensitivity to changes in the attitudes of students, which may indicate they are at risk of radicalisation.

Online Safety

All staff are aware of the College Policy on E-Safety which sets out our expectations relating to:

- Creating a safer online learning environment.
- Giving everyone the skills, knowledge and understanding to help students and young vulnerable people stay safe on line, question the information they are accessing and support the development of critical thinking.
- Inspiring safe and responsible use and behaviour of mobile technologies, to combat behaviours on line which may make students vulnerable including sexting.
- Use of mobile technology both within College and on College trips/outings.

- Use of camera equipment, including smart phones.
- What steps to take if there are concerns and where to go for help.
- Staff use of social media as set out in the Social Media Policy.

Cyber-bullying, via texts and emails, will be treated as seriously as any other type of bullying and will be managed through our anti-bullying procedures. This includes sexting and image exchange under threat or use of coercion.

Students, staff and parents are supported to understand the three areas of risk:

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

Resources that could support online safety include:

- [Disrespectnobody](#) is Home Office advice and includes resources on healthy relationships, including sexting and pornography
- [Education for a connected world framework](#) from the UK Council for Internet Safety supports the development of the curriculum and is of particular relevance to RSHE education and Computing. It is designed, however, to be usable across the curriculum and beyond (covering early years through to age 18) and to be central to a whole school or college approach to safeguarding and online safety.

Sexting or sharing nudes or semi nudes

‘Sexting’, also referred to as ‘youth produced sexual imagery’ including the sharing of nudes or semi nudes, is one of a number of ‘risk-taking’ behaviours associated with the use of digital technologies, social media or the internet. It is accepted that young people experiment and challenge boundaries and therefore the risks associated with ‘online’ activity can never be completely eliminated.

Staff, students and parents are supported via training to understand the creation and sharing of sexual imagery, such as photos or videos, of under 18s is illegal. This includes imagery of pupils themselves if they are under the age of 18.

Any youth produced sexual imagery disclosures will follow the normal safeguarding practices and protocols for our College. We will also use the guidelines for responding to incidents, as set out in the publication ‘Sharing nudes and semi-nudes: advice for education settings’ produced by the UK Council for Child Internet Safety. <https://www.gov.uk/government/publications/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people> This requires us to share reports of this type of activity with the Police.

If a member of staff becomes aware of an incident

- The member of staff must notify the Campus Safeguarding Officer immediately and must investigate the incident they must also advise if they have viewed the imagery by accident
- Do not copy, print, share, store or save the imagery or ask the student to share or download as this is illegal
- Do not delete the imagery or ask the young person to delete it
- Do not share information about the incident with other members of staff, students, parents or carers
- Do not say or do anything to blame or shame any young person involved

The Campus Safeguarding Officer

- Will determine if there is an immediate risk to a student
- Will meet with the member of staff who heard the disclosure
- Meet with student and obtain further information
- Whether the imagery has been shared widely and via what services and/or platforms (this may be unknown)
- Inform parents and carers unless there is good reason to believe that involving them would put the child or young person at risk of harm
- Make a referral to social care and or the police immediately if there is concern that a child or young person has been harmed or is at risk of immediate harm at any point in the process

Peer on Peer Abuse

The College believes that all students have a right to attend College and learn in a safe environment free from harm by both adults and other students and have a zero-tolerance approach to abuse. We recognise that some safeguarding concerns can occur via peer on peer abuse.

All staff recognise that peer on peer issues may include, but may not be limited to:

- Bullying (including cyber bullying, prejudice-based and discriminatory bullying)
- Abuse in intimate personal relationships between peers
- Physical abuse; such as hitting, hair-pulling, shaking, biting or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
- Sexual violence, such as rape, assault by penetration and sexual assault; (this may include an online element which facilitates, threatens and or/encourages sexual violence)
- Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse
- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- Consensual and non-consensual shared of nudes and semi-nude images and or videos (also known as sexting or youth produced imagery)
- Upskirting which typically involves taking a picture under a person's clothing with their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm
- 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)

If a student makes an allegation of abuse against another student:

- The member of staff must record the allegation of abuse and tell the Campus Safeguarding Officer, but do not investigate it
- The Campus Safeguarding Officer will contact the local authority social care team where appropriate and follow its advice, as well as the police if the allegation involves a potential criminal offence
- The Campus Safeguarding Officer will put support in place for all students involved (including the victim(s), the student(s) against whom the allegation has been made any others affected) with a named person they can talk to
- The Campus Safeguarding Officer will also contact the relevant mental health service if appropriate

The following will be considered when dealing with incidents:

- Whether there is a large difference in power between the victim and perpetrator i.e. size, age, ability, perceived social status or vulnerabilities, including SEND, CP/CIN or CLA
- Whether the perpetrator has previously tried to harm or intimidate students
- Any concerns about the intentions of the alleged perpetrator

In order to minimise the risk of peer on peer abuse taking place, College must:

- Challenge any form of derogatory or sexualised language or behaviour, including requesting or sending sexual images
- Deliver tutorials to include teaching students about how to keep safe and understanding what acceptable behaviour looks like
- Be vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female students, and initiation or hazing type violence with respect to male students
- Ensure that students know that all members of staff will listen to them if they have concerns and will act upon them
- Have systems in place for any student to be able to voice concerns such as ‘The Report a Concern’ button
- Develop robust risk assessments if appropriate
- Refer to any other relevant policies when dealing with incidents, such as the **Behaviour Policy** and/or the **Anti-Bullying Policy**

Upskirting

We recognise that ‘Upskirting’ involves taking a photograph under an individual’s clothing without their knowledge. We understand that it causes the victim distress and humiliation. Staff recognise that ‘Upskirting’ is a criminal offence under the Voyeurism Act, and must promptly report any such incidence to the Principal, DSL or most senior member of staff. Offenders can now be arrested, face up to 2 years in prison and have their names placed on the sex offenders register.

Sexual Harassment

Sexual harassment means ‘unwanted conduct of a sexual nature’ that can occur online and offline, within College and outside. When we reference sexual harassment, we do so in the context of child on child sexual harassment. 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. The College has a zero-tolerance approach to sexual harassment and it will not be tolerated. Whilst not intended to be an exhaustive list, sexual harassment can include;

- Sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names;
- Sexual “jokes” or taunting;
- 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. It may include:
 - Non-consensual sharing of sexual images and videos. (UKCIS sexting advice provides detailed advice for schools and colleges); <https://www.gov.uk/government/publications/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people>
 - Sexualised online bullying;
 - Unwanted sexual comments and messages, including, on social media; and Sexual exploitation; coercion and threats.

Reference will be made to the following government guidance and part 5 of the **Keeping Children Safe in Education, Sept 2021** to ensure that all staff have an understanding of the serious nature of sexual violence and sexual harassment between students in Colleges. [Sexual Violence and sexual harassment between children in Colleges – GOV.UK](#)

The College recognises that students may not find it easy to tell staff about their abuse verbally. All staff receive training to identify students who may show signs or act in a way that they hope a member of staff will notice and react to. For example, a friend may make a report or a member of college staff may overhear a conversation that suggests that a student has been harmed or a students' behaviour might indicate that something is wrong.

If a student makes a disclosure:

- The member of staff must record the allegation of abuse and tell the Campus Safeguarding Officer, but do not investigate it, reassure the victim that they are being taken seriously and that they will be supported and kept safe
- The Campus Safeguarding Officer will contact the local authority social care team where appropriate and follow its advice, as well as the police if the allegation involves a potential criminal offence
- The Campus Safeguarding Officer will put support in place for all students involved (including the victim(s), the student(s) against whom the allegation has been made any others affected) with a named person they can talk to
- The Campus Safeguarding Officer will also contact the relevant mental health service if appropriate

In order to minimise the risk of sexual harassment taking place, College must:

- Challenge any form of derogatory or sexualised language or behaviour, including requesting or sending sexual images
- Deliver tutorials to include teaching students about how to keep safe and understanding what acceptable behaviour looks like
- Be vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female students, and initiation or hazing type violence with respect to male students
- Ensure that students know that all members of staff will listen to them if they have concerns and will act upon them
- Have systems in place for any student to be able to voice concerns such as 'The Report a Concern' button
- Develop robust risk assessments if appropriate
- Refer to any other relevant policies when dealing with incidents, such as the **Behaviour Policy** and/or the **Anti-Bullying Policy**

Sexual Violence

The College has a zero-tolerance approach to sexual violence and it will not be tolerated under the Sexual Offences Act 2003. Sexual violence is described as;

- **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.

If a student makes a disclosure:

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- The Campus Safeguarding Officer will contact the local authority social care team where appropriate and follow its advice, as well as the police if the allegation involves a potential criminal offence

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- Develop robust risk assessments if appropriate
- Refer to any other relevant policies when dealing with incidents, such as the **Behaviour Policy** and/or the **Anti-Bullying and Harassment Policy**

Cultural Issues

As a College we are aware of the cultural diversity of the community around us and seek to work sensitively to address the unique culture of our students and their families as they relate to safeguarding and child protection. This includes students at risk of harm from abuse arising from culture, faith and belief on the part of their parent, carer or wider community.

As a staff team we are aware of the harm to children and young people that can be caused by practices linked to culture, faith and beliefs. We promote awareness through training and access to resources.

Staff will report concerns about abuse linked to culture, faith and beliefs in the same way as other child protection concerns.

We support students, via targeted sessions and delivery through our curriculum, to understand that some aspects of cultural or religious practice and beliefs could cause harm and they should turn to someone they trust or an organisation such as ChildLine for help and support.

So Called ‘Honour’ Based Abuse (including Female Genital Mutilation and Forced Marriage)

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

Staff at our College understand there is a legal duty to report known cases of Female Genital Mutilation (FGM) and So Called ‘Honour’ Based Abuse to the Police and they will do this with the support of the DSL. [Mandatory reporting of female genital mutilation: procedural information – GOV.UK](#)

Our College is aware of the need to respond to concerns relating to forced marriage and understand that it is illegal, a form of abuse and a breach of a student's rights. We recognise some students, due to capacity or additional learning needs, may not be able to give an informed consent and this will be dealt with under our child protection processes. Staff can contact the Forced Marriage Unit if they need advice or information. Contact 020 7008 0151 fm@fco.gov.uk

We are aware of the signs of FGM [Female Genital Mutilation \(FGM\) NSPCC](#)

We recognise both male and female students may be subject to honour based abuse e.g. where their cultural background are at odds with their behaviours such as sexuality, under-age sex, relationships, gender identity or life style choices.

We promote awareness through training and access to resources, ensuring that the signs and indicators are known and recognised by staff.

Any suspicions or concerns for forced marriage are reported to the DSL who will refer to First Response or the Police if emergency action is required.

Contextual Safeguarding

Contextual Safeguarding is an approach to understanding, and responding to, student's experiences of significant harm beyond their families. It recognises that the different relationships that students form in their neighbourhoods, colleges and online can feature violence and abuse. Parents and carers may have little influence over these contexts, and student's experiences of extra-familial abuse can undermine parent/carer-student relationships.

- At our College we recognise that students may encounter safeguarding issues that happen in the wider community and we will respond to such concerns, reporting to the appropriate agencies in order to support and protect them.
- All staff, and especially the DSLs, will consider the context of incidents that occur outside of College to establish if environmental factors may be putting their student's welfare and safety at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, and serious youth violence.
- Students who may be alleged perpetrators will also be supported to understand the impact of contextual issues on their safety and welfare.
- In such cases the individual needs and vulnerabilities of each student will be considered.

Serious Violence

All staff are aware of signs and indicators which may signal that students are at risk from, or are involved with, serious violent crime. These may include increased absence from College, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or significant change in well-being or signs of assault or unexplained injuries. Staff are aware that unexplained gifts or new possessions could also indicate that students have been approached by, or are involved with, individuals associated with criminal networks or gangs.

There are also a range of risk factors which increase the likelihood of involvement in serious violence, such as being male, having been frequently absent or permanently excluded from school, having experienced child maltreatment and having been involved in offending, such as theft or robbery. Additional advice is provided in the Home [Office's Preventing Youth Violence and gang involvement](#) and its [Criminal exploitation of children and vulnerable adults: county lines](#) guidance.

At our College we are aware of the risks to students and will take appropriate measures to manage any situations arising.

Children Potentially at Greater Risk of Harm

Children who need a social worker (Child in Need and Child Protection Plans)

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

Mental Health

All staff should also be 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.

Only appropriately, trained professionals should attempt to make a diagnosis of a mental health problem. Staff, however, are well placed to observe their day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or at risk of developing one.

Where children have suffered abuse or neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children's experiences, can impact on their mental health, behaviour and education.

If staff have a mental health concern about a student that is also a safeguarding concern, immediate action should be taken, advising the Campus Safeguarding and Prevent Officer.

The department has published advice and guidance on Preventing and Tackling Bullying, and [Mental Health and Behaviour in Schools](#) (which may also be useful for colleges). In addition, Public Health England has produced a range of resources to support secondary school teachers to promote positive health, wellbeing and resilience among young people including its guidance promoting children and young people's emotional health and wellbeing. Its resources include social media, forming positive relationships, smoking and alcohol. See [Rise Above](#) for links to all materials and lesson plans.

Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The Designated Safeguarding Lead (and any deputies) should be aware of contact details and referral routes in to the Local Housing Authority so they can raise/progress concerns at the earliest opportunity. Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property. Whilst referrals and/or discussion with the Local Housing Authority should be progressed as appropriate, and in accordance with local procedures, this does not, and should

not, replace a referral into children's social care where a child has been harmed or is at risk of harm.

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

The new duties shift focus to early intervention and encourage those at risk to seek support as soon as possible, before they are facing a homelessness crisis.

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

Use of Photography

We will often use photographs and film to capture achievements and help promote successes within our College. Via our website we like to be able to share these events with parents. We are however mindful of the safety of our students.

As confirmed in the Data Protection Act, our College will ensure written consent is sought from the parent or carer of any student under the age of 18 *before* any photographs are taken. If consent is given, we will make a clear agreement with the parent or carer as to how the image will be used (*for example, in a brochure or website*) and how widely (*as part of a College newsletter for all parents, etc.*). Our agreement with parents and students includes how images will be stored, how long they will be stored for and how they will be disposed of.

Due consideration will be given to the appropriateness of clothing and posture, and details such as a student's name or age will not be shared unless integral to the use of the image (*such as the acceptance of an award*) in particular when additional identifiers are being shared.

We acknowledge the right of parents and students to withhold or withdraw consent at any point in time of the duration the student is at the College.

Policy Review

The Governing Body of our College is responsible for ensuring the annual review of this Policy, and for reporting back to the Buckinghamshire County Council. The date the next review is due is on the front cover of this Policy.

APPENDIX ONE

Everyone who works with children has a duty to safeguard and promote their welfare. They should be aware of the signs and indicators of abuse and know what to do and to whom to speak if they become concerned about a student or if a student discloses to them.

The following is intended as a reference for College staff and parents/carers if they become concerned that a student is suffering or likely to suffer significant harm.

The Children Act 1989 defines abuse as when a child is suffering or is likely to suffer 'significant harm'. Harm means ill treatment or the impairment of health or development. Four categories of abuse are identified:

Categories of Abuse

Child abuse is a form of maltreatment. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Children 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. Children may be abused by an adult or adults, or another child or children.

Physical Abuse

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

Emotional Abuse

The persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyber bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, though it may occur alone.

Sexual Abuse

Involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

Neglect

The persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: a. provide adequate food, clothing and shelter (including exclusion from

home or abandonment) b. protect a child from physical and emotional harm or danger c. ensure adequate supervision (including the use of inadequate caregivers) d. ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Exploitation

Exploitation is a form of child abuse and may take a number of forms.

Child Criminal Exploitation (CCE)

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

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

CCE can include children being forced to work in cannabis factories, being coerced into moving drugs or money across the country (county lines), forced to shoplift or pickpocket, or to threaten other young people.

Some of the following can be indicators of CCE:

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

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

As set out in the [Serious Violence Strategy](#), published by the Home Office.

Child Sexual Exploitation

Child sexual exploitation is a form of child sexual abuse. Sexual abuse 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 clothing. It may include non-contact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse (including via the internet).

It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 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. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology.

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/591903/CSE_Guidance_Core_Document_13.02.2017.pdf

We recognise that exploitation includes the trafficking of children and Modern Day Slavery. [Victims of modern slavery – frontline staff guidance.](#)

Preventing Radicalisation

Students are vulnerable to extremist ideology and radicalisation. Similar to protecting students from other forms of harm and abuse protecting students from this risk is part of the College's safeguarding approach and addressed in tutorials, classes and student voice.

Extremism is the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. 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.

Terrorism is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat **must** be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

County Lines

As set out in the Serious Violence Strategy (see link below), published by the Home Office, a term used to describe gangs and organised criminal networks involved in exporting illegal drugs into one or more importing areas within the UK, using dedicated mobile phone lines or other form of 'deal line'.

Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to move [and store] drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children can be targeted and recruited into county lines in a number of locations including schools, further and higher educational institutions, pupil referral units, special educational needs schools, children's homes and care homes. Children are often recruited to move drugs and money between locations and are known to be exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection. Children can easily become trapped by this type of exploitation as county lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

One of the ways of identifying potential involvement in county lines are missing episodes (both from home and school), when the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism¹⁰³ should be considered. If a child is suspected to be at risk of or involved in county lines, a safeguarding referral should be considered alongside consideration of availability of local services/third sector providers who offer support to victims of county lines exploitation.

Taken from "Working Together" 2018

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/722305/Working_Together_to_Safeguard_Children_-_Guide.pdf

Cyber Crime

Cyber crime is a criminal activity committed using computers and/or the internet. Students with particular skill and interest in computing and technology may inadvertently or deliberately stray into cyber-dependant crime.

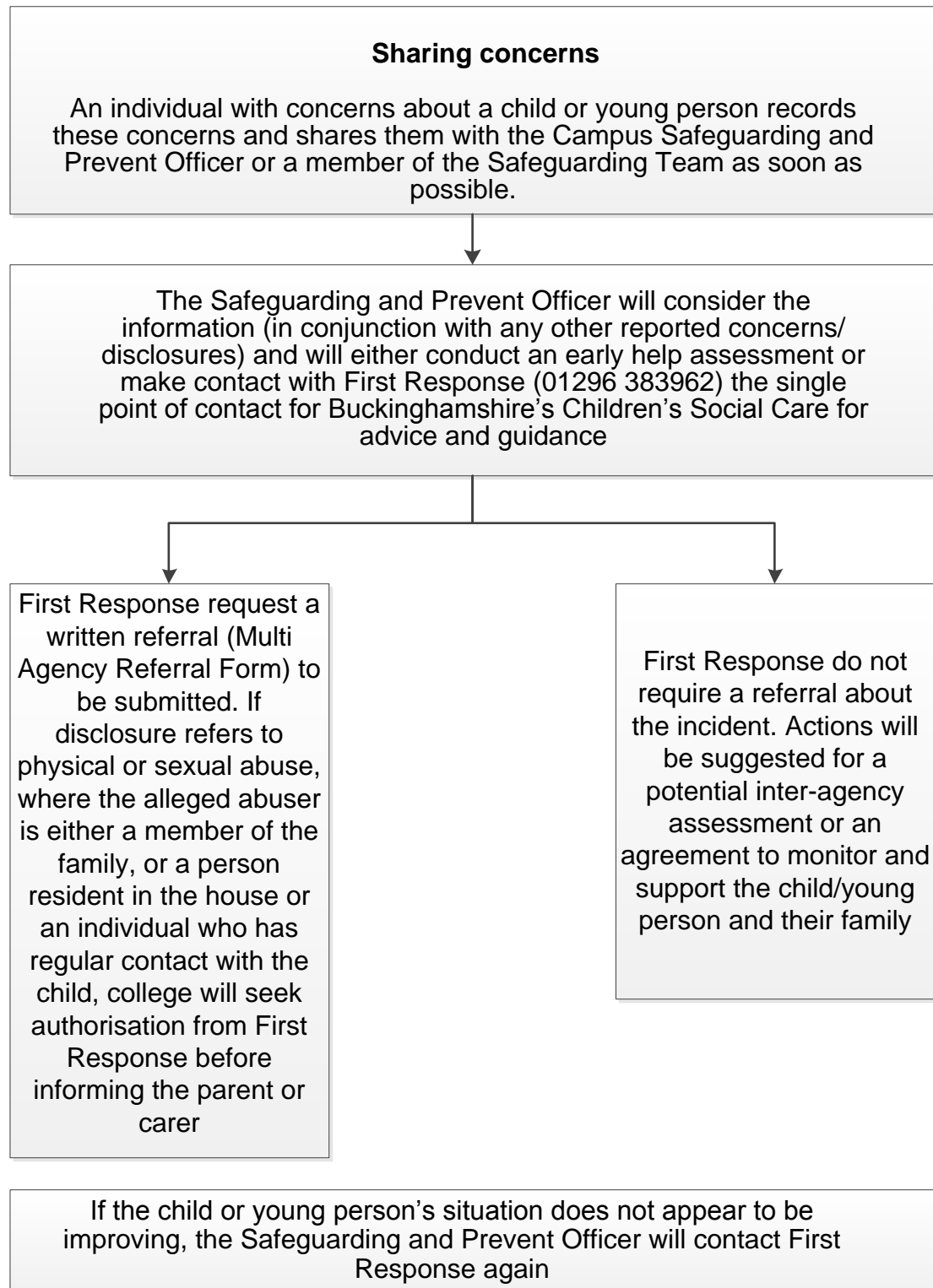
If staff have concerns about a student they should advise the Campus Safeguarding Officer who should consider referring into the Cyber Choices programme.

Domestic Abuse

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

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

APPENDIX TWO

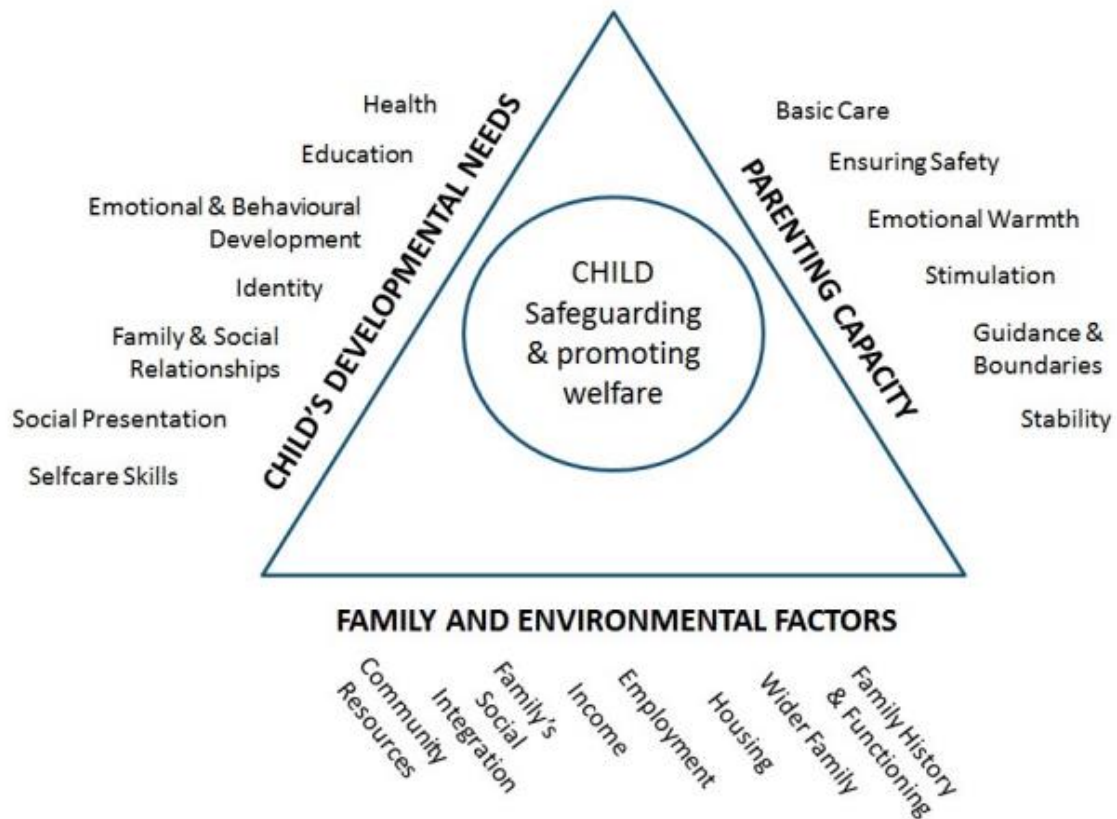


For serious emergencies in the evenings, weekends or public holidays, the Emergency Duty Team can be contacted on 01494 675802. Calls can also be made to the Police using 101 (non-emergency number) or 999 in the case of an emergency.

Appendix Three

Assessment Framework

(Taken from Working Together to Safeguard Children, July 2018)



Every assessment should draw together relevant information gathered from the child and their family and from relevant practitioners including teachers and College staff, early years workers, health practitioners, the Police and adult social care.

Every assessment of a child should reflect the unique characteristics of the child within their family and community context.

Each child whose referral has been accepted by children's social care should have their individual needs assessed, including an analysis of the parental capacity to meet those needs, whether they arise from issues within the family or the wider community.

Frequently, more than one child from the same family is referred and siblings within the family should always be considered.

Equality Impact Statement

We have a duty to consider the impact of changes on groups with Protected Characteristics (race, disability, age, sexual orientation, religion or belief, gender reassignment, pregnancy and maternity, marriage and civil partnership).

What are the overall aims of the change? Why are you proposing it?	The aim of this policy is to provide a framework to ensure that the guidelines are in place to support all stakeholders
Given the aims of your proposal, what issues does your data/information highlight?	Everybody is included within this policy, and all groups are given equability in regards to their needs and provisions
How could the proposed change affect positively/negatively on groups with protected characteristics?	This has a positive impact on all groups with protected characteristics, as they are ensured equal treatment and provision based on their needs. Risk assessments may be carried out to ensure that this is the case and provisions maybe altered to accommodate specific needs
What actions will you take to mitigate any negative impact?	No negative impact to having this policy
Is there any potential negative impact justified in light of wider benefits of the proposal?	No negative impact to having this policy
Recording final decision	This policy requires Executive and Quality and Curriculum Committee approval
Has the policy taken into consideration the requirements of GDPR regulations? Are there any actions that need addressing, e.g.; data sharing agreement; has data consent been considered; data retention timescales?	GDPR regulations have been considered and actions comply with data protection requirements.