

# Young People and Adults at Risk Safeguarding Policy

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|--|---|
| <b>SLT Member responsible for policy</b>                         | Vice Principal Safeguarding & Pastoral Care |
| <b>Date of policy</b>  | March 2023                                  |
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| <b>Date Equality &amp; Diversity Impact Assessment completed</b> | September 2022                              |

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# 1. Policy Aims, Statement and Principles

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## 1.1 Aims

- To provide all staff with the necessary information to enable them to meet their safeguarding and child protection responsibilities.
- To ensure consistent good practice, through training, auditing and development.
- To demonstrate the College's commitment with regard to safeguarding and child protection to learners, parents and other partners.
- To provide a learning environment which is safe and secure.
- To teach young people and adults at risk how to keep themselves safe and provide structures for them to raise concerns if they are worried or at risk of harm.
- To maintain a robust recording system for any safeguarding or child protection information.
- To ensure that the College adheres to safer recruitment guidance and legislation, deals promptly with allegations of abuse against staff and takes action.
- To support young people's mental health and wellbeing.
- To regularly review policies and procedures to ensure that young people and adults at risk are protected.

## 1.2 Statement

Hereward College acknowledges it has a statutory and moral duty of care to safeguard and promote the welfare of children, young people and adults at risk of harm and is fully committed to ensuring safeguarding practice reflects statutory responsibilities and government guidance.

Throughout the policy and procedure, reference is made to 'young people'. This term is used to mean everyone under the age of 18. Safeguarding and promoting the welfare of children is defined as: protecting children from maltreatment; preventing impairment of children's mental and physical health or development; ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and taking action to enable all children to have the best outcomes (*Keeping Children Safe in Education. DfE 2022*)

Reference is also made to 'adult at risk'. An adult at risk of abuse or neglect is defined as someone who has needs for care and support, who is experiencing, or at risk of, abuse or neglect and, as a result of their care needs, is unable to protect themselves. (The Care Act 2014)

Hereward College acknowledges that learners with special educational needs and disabilities (SEND) can face additional safeguarding challenges and be particularly vulnerable to abuse and the College accepts the responsibility to take reasonable and appropriate steps to ensure their welfare.

The College is committed to maintain procedures and practices which safeguard and promote the welfare of all learners and staff by ensuring the safeguarding policy meets the Department for Education's statutory guidance for colleges. (*Keeping Children Safe in Education. DfE 2022*).

Due to their day-to-day contact with learners, staff in College are uniquely placed to observe changes in behaviour, appearance and communication and the outward signs of abuse, neglect, exploitation and radicalisation. Young people or adults at risk may also turn to a trusted adult in College when they are in

distress or at risk. It is vital that all staff are alert to the signs of abuse, are approachable and trusted by learners, listen actively to learners and understand the procedures for reporting their concerns. The College will act on identified concerns and will provide early help to prevent concerns from escalating.

### 1.3 Principles

- Safeguarding and promoting the welfare of young people is everyone's responsibility. Everyone who comes into contact with young people and their families has a role to play. In order to fulfil this responsibility effectively, all practitioners should make sure their approach is young person centred. This means that they should consider, at all times, what is in the best interest of the young person. (Keeping Children Safe in Education, KCSiE, DfE,2022)
- The College's responsibility to safeguard and promote the welfare of its learners is of paramount importance. The College will work to identify young people and adults at risk who are suffering or likely to suffer abuse, exploitation or neglect and act to protect them.
- Will work with relevant services and agencies to ensure that young people and adults at risk are protected from harm.
- The College has a designated safeguarding lead and designated deputies, who will provide support to staff, students and families.
- All learners, under the 9 protected characteristics of the Equality Act 2010, have equal rights to protection.
- Support young peoples and adults at risk mental health and wellbeing.
- All College staff have a responsibility to provide a safe and secure environment in which young people and adults at risk can learn.
- Ensure that we adhere to safer recruitment guidance and legislation, deal promptly with allegations of abuse against staff and take bullying and harassment seriously.
- This College is committed to safeguarding and promoting the welfare of young people and adults at risk and expects all staff and volunteers to share this commitment.
- All staff have an equal responsibility to act on any suspicion or disclosure that may suggest a young person or adult at risk may be at risk of harm at home, in the community or in College.
- All College staff understand their roles and responsibilities in respect of safeguarding and are provided with appropriate training opportunities to recognise, identify and respond to signs of abuse, neglect and other safeguarding concerns (including online safety) relating to young people and adults at risk.
- All College staff should be prepared to identify learners who may benefit from early help providing support as soon as a problem emerges and ensuring risk assessments are in place for all learners deemed at risk.
- Maintain a robust recording system for any safeguarding or child protection information.
- Any staff member who has a concern that there is a risk of immediate serious harm to a young person or adult at risk must instantly work with the Designated Safeguarding Lead to ensure a referral will be made immediately to Children's or Adult Social Care at the relevant Local Authority.
- All staff must ensure that detailed accurate records of all safeguarding concerns are logged and maintained on the CPOMs system. All records and paper-based information will be securely stored.
- Learners and staff involved in child and adult protection issues will receive appropriate support.

- This policy will be reviewed annually unless an incident; new legislation or guidance suggests the need for an interim review
- All volunteers, contractors, stakeholders, partners working with or for the College will be required to operate within the ethos and parameters of the safeguarding policy and its procedures.
- Failure to comply with the safeguarding policy and procedures will be addressed without delay through the staff disciplinary policy.
- The governing body will ratify and ensure that the College has a safeguarding policy and procedure in place.
- This policy is available on the College website and all staff and volunteers are required to read it and confirm they have done so in writing before commencing work in College.
- All staff are professionally accountable and follow the staff code of conduct. Any concerns or allegations of misconduct, including wellbeing concerns for staff are shared swiftly and at the earliest opportunity to **maintain a culture of vigilance**. All staff are aware of their responsibility to share low level concerns with equal urgency to ensure all children are supported in an **environment of openness, trust, and transparency**.

#### 1.4 Scope

This policy applies to all teaching, non-teaching, support, supply, contract staff, governors and volunteers working in or on behalf of the College. All references in this document to ‘staff or members of staff’ should be interpreted as relating to the aforementioned unless otherwise stated.

#### 1.5 Safeguarding Legislation and Guidance

Section 175 of the Education Act 2002 requires local education authorities and the governors of maintained schools and further education (FE) colleges to make arrangements to ensure that their functions are carried out with a view to safeguarding and promoting the welfare of young people.

The **Teachers’ Standards** state that teachers, including headteachers, must have regard for the need to safeguard pupils’ well-being, in accordance with statutory provisions; and uphold public trust in the teaching profession as part of their professional duties.

The statutory guidance **Working Together to Safeguard Children (DfE,2018)** covers the legislative requirements and expectations of individual services (including schools and colleges) to safeguard and promote the welfare of children. It also provides the framework for the three local safeguarding partners (the local authority; a clinical commissioning group for an area, any part of which falls within the local authority; and the chief officer of Police for a Police area, any part of which falls within the local authority area) to make arrangements to work together to safeguard and promote the welfare of local young people including identifying and responding to their needs. The guidance confirms that it applies, in its entirety, to all schools and colleges.

The statutory guidance **Keeping Children Safe in Education (DfE 2022)** is issued under Section 175 of the Education Act 2002, the Education (Independent School Standards) Regulations 2014 and the Non-Maintained Special Schools (England) Regulations 2015. Schools and colleges **must** have regard to this guidance when carrying out their duties to safeguard and promote the welfare of young people.

## Human Rights Act

The Human Rights Act 1998 (HRA) sets out the fundamental rights and freedoms that everyone in the UK is entitled to and contains the Articles and protocols of the European Convention on Human Rights (ECHR) (the Convention) that are deemed to apply in the UK. It compels public organisations to respect and protect an individual's human rights when they make individual decisions about them.

Under the HRA, it is unlawful for schools and colleges to act in a way that is incompatible with the Convention. The specific convention rights applying to schools and colleges are:

- Article 3: the right to freedom from inhuman and degrading treatment (an absolute right)
- Article 8: the right to respect for private and family life (a qualified right) includes a duty to protect individuals' physical and psychological integrity
- Article 14: requires that all of the rights and freedoms set out in the Act must be protected and applied without discrimination, 25 and
- Protocol 1, Article 2: protects the right to education.

Being subjected to harassment, violence and or abuse, including that of a sexual nature, may breach any or all of these rights, depending on the nature of the conduct and the circumstances. Further information (including on absolute and qualified rights) can be found at Human Rights | Equality and Human Rights Commission ([equalityhumanrights.com](http://equalityhumanrights.com)).

## Equality Act 2010

Schools and colleges have obligations under the Equality Act 2010 (the Equality Act)

According to the Equality Act, schools and colleges **must** not unlawfully discriminate against pupils because of their sex, race, disability, religion or belief, gender reassignment, pregnancy and maternity, or sexual orientation (protected characteristics).

Whilst all of the above protections are important, in the context of safeguarding, this guidance, and the **legal duties** placed on schools and colleges in relation to safeguarding and promoting the welfare of children, governing bodies and proprietors should carefully consider how they are supporting their pupils and students with regard to particular protected characteristics - including disability, sex, sexual orientation, gender reassignment and race.

Provisions within the Equality Act allow schools and colleges to take positive action, where it can be shown that it is proportionate, to deal with particular disadvantages affecting pupils or students with a particular protected characteristic in order to meet their specific need, this includes a duty to make reasonable adjustments for disabled children and young people, including those with long term conditions. A school or college, could, for example, consider taking positive action to support girls if there was evidence they were being disproportionately subjected to sexual violence or sexual harassment.

Guidance to help schools understand how the Equality Act affects them and how to fulfil their duties under the act can be found at Equality Act 2010: advice for schools - GOV.UK ([www.gov.uk](http://www.gov.uk)), it may also be useful for colleges. For further information Equality Act guidance | Equality and Human Rights Commission ([equalityhumanrights.com](http://equalityhumanrights.com)).



## 2. Roles and Responsibilities

### 2.1 Designated staff with responsibility for safeguarding

|   |   |
|---|---|
| Designated Safeguarding Lead (DSL) for Young People and Adults at Risk    | <p><b>Jane Ferguson,</b><br/> <b>Vice Principal Safeguarding &amp; Pastoral Care</b><br/> (x 6130)<br/> Email: <a href="mailto:jane.ferguson@hereward.ac.uk">jane.ferguson@hereward.ac.uk</a></p>   |
| Deputy Designated Safeguarding Lead                                       | <p><b>Emma Barker</b><br/> <b>Safeguarding &amp; Risk Manager</b><br/> (x 6161)<br/> Email: <a href="mailto:Emma.Barker@hereward.ac.uk">Emma.Barker@hereward.ac.uk</a></p> <p><b>Tess Murray &amp; Nikki Schoolar</b><br/> <b>Safeguarding &amp; Pastoral Care Coordinators</b><br/> (x 6280)<br/> Email: <a href="mailto:Theresa.Murray@hereward.ac.uk">Theresa.Murray@hereward.ac.uk</a> or<br/> <a href="mailto:Nikki.schoolar@hereward.ac.uk">Nikki.schoolar@hereward.ac.uk</a></p> <p><b>Care Manager</b> (x 6148)<br/> Justine Hamilton<br/> <b>Registered Manager</b><br/> Maxine Darcy (x 6148)</p> |
| Designated Digital Safety & Security Person                               | <p><b>Simon Shackleton,</b><br/> <b>Technical Estates &amp; Facilities Manager</b> (x 6117)</p>   |
| Designated Lead for Looked After and Previously Looked After Young People | <p><b>Dave Ackerman – Lead Progress Coach</b> (x 6123)</p>  |
| Named Governor for Safeguarding   | <p><b>Hannah Friend</b><br/> Contact via Yvonne Doherty,<br/> Clerk to the Corporation (x 6133)</p>   |
| Local Authority Designated Officer (LADO) for allegations against staff   | <p><b>Kirsty Wiltshire</b><br/> Email <a href="mailto:lado@coventry.gov.uk">lado@coventry.gov.uk</a><br/> 024 7697 5483</p>   |

## 2.2 Designated Safeguarding Lead (DSL) responsibilities

- Vice Principal for Safeguarding & Pastoral Care has the status and authority within the College to carry out the duties of the post, including committing resources and supporting and directing other staff. The role and responsibility is explicit in the role holder's job description.
- Takes lead responsibility for safeguarding and child protection including (online safety) in the College, which will not be delegated although the activities of the DSL may be delegated to appropriately trained deputies.
- Is appropriately trained, (including Prevent) receives refresher training at two-yearly intervals and regularly (at least annually) updates their knowledge and skills to keep up with any developments relevant to their role.
- Acts as a source of advice, support and expertise to the College community and encourages a culture of listening to young people and taking account of their wishes and feelings.
- Is alert to the specific needs of young people and adults at risk, those with special educational needs, looked after young people, young carers and those young people who have a social worker. Promoting the educational outcomes by sharing information about their welfare, circumstances and needs with teachers and staff as appropriate.
- Works closely with pastoral support staff; the designated teacher for young people who are looked after or were previously looked after; staff with designated responsibility for promoting young people's mental health and emotional wellbeing; the ICT lead and any ICT support staff; and College nurses in relation to safeguarding matters (including online and digital safety) and whether to make referrals to relevant partner agencies.
- Has a working knowledge of locally agreed multi agency safeguarding arrangements and procedures in place?
- Keeps detailed and accurate records of all concerns, ensuring that such records are stored securely.
- Where young people leave the College (including in year transfers) the DSL **should** ensure their child protection file is transferred to the new College as soon as possible, and **within 5 working days**.
- Refers cases of suspected abuse to Social Care or the Police as appropriate and notifies the Principal and where a crime may have been committed, refers cases to the Police.
- Refer cases of suspected radicalisation to the Prevent team for investigation.
- Notifies Children's or Adult Social Care if a young person with a child protection plan or an adult at risk has a sustained period of absence without explanation.
- Ensures that, when a learner leaves the College, all safeguarding records are passed to the new college where applicable and confirmation of receipt obtained. If the young person or adult at risk is the subject of an open case to Children's or Adult Social Care, their social worker is also informed.
- Attends and/or contributes to safeguarding conferences, strategy meetings and multi-agency meetings.
- Has an understanding of the early help process to ensure effective support, assessment and understanding of young people's additional needs.
- Develops effective links with relevant statutory and voluntary agencies including the local safeguarding partnerships.
- Ensures that all staff sign to indicate that they have read and understood the Young People and Adults at Risk Safeguarding Policy, Staff Behaviour Policy (Code of Conduct) Part 1 and Part 5 and Annex B of 'Keeping Children Safe in Education DfE 2022'.

- Has a working knowledge of relevant national guidance in respect of all specific safeguarding issues highlighted in paragraph 31-50 (pages 11-16) and Annex B (page 139) of 'Keeping Children Safe in Education DfE 2022' ensuring that all staff receive necessary training, information and guidance.
- Ensures that the Young People and Adults at Risk Safeguarding Policy and procedures are regularly reviewed and updated annually.
- Refers cases where a person is dismissed or has left the College due to risk/harm to a learner to the Disclosure and Barring Service, as required.
- Understands the unique risks associated with online safety and ensures that staff are trained to have the requisite knowledge and up to date capability to keep children safe whilst they are online.
- Understands the relevance of data protection legislation and regulations, especially the Data Protection Act 2018 and General Data Protection Regulation (GDPR) in respect of safeguarding children.
- Ensures that the College holds more than one emergency contact number for every learner.
- Liaises with the nominated governor and Principal as appropriate.
- Keeps a record of staff attendance at safeguarding training.
- Informs the Principal of any serious safeguarding enquiries, especially under section 47 of the Children Act 1989 and any Police investigations. This includes being aware of the requirement for young people to have an Appropriate Adult.
- Makes the Young People and Adults at Risk Safeguarding Policy available publicly, i.e. on the College's website or by other means.
- Ensures parents are aware of the College's role in safeguarding and that referrals about suspected abuse and neglect may be made.
- Provides an annual report to the governing body setting out how the College has discharged its duties.
- Regularly meets with the safeguarding link governor to review safeguarding at the College and liaises with the Principal regarding safeguarding cases and issues.
- Ensures that staff are supported in recognition of the stressful and traumatic nature of safeguarding.
- Encourage a culture of listening to young people, understand the difficulties that young people may have in approaching staff about concerns and the barriers to communication.
- Should know what to do if a young person tells them that he/she is being abused, exploited or neglected but that young people may not feel ready or know how to tell someone that they are being abused, exploited or neglected and/or recognise their experience as harmful and are aware of the indicators of child on child abuse and procedures to deal with this.
- Work with the multi-disciplinary team across College to promote safeguarding practice.
- Support staff to develop professional curiosity and to speak to the DSL around any concerns they may have about a young person.
- Understands the referral process to the (LADO) and the role they play should they have concerns or allegations are made against any member of staff;
- Ensures that the Principal is made aware under 'Working Together 2018' of all referrals involving allegations that a learner has been harmed or that a learner may be at risk of harm from a member of staff or volunteer to the Designated Officer in the Local Authority within one working day prior to any internal investigation.

- Promotes the educational outcomes of any young person who have experienced or are experiencing safeguarding or child protection issues by sharing relevant information with teachers and the college leadership team.

### 2.3 Deputy Designated Safeguarding Lead responsibilities

Is/are appropriately trained to the same standard as the DSL and, in the absence of the DSL, carries out those functions necessary to ensure the ongoing safety and protection of learners. In the event of the long-term absence of the DSL, one deputy will be nominated as acting DSL and will assume all of the functions of the DSL above.

### 2.4 Staff responsibilities

Staff:

- Have a responsibility to provide a safe environment, where young people and adults at risk can learn;
- Should know what to do if a young person or adult at risk tells them that he/she is being abused or neglected;
- Will be able to identify indicators of abuse;
- Will be made aware of; the safeguarding and child protection policy; the behaviour policy; the staff behaviour policy; information about the safeguarding response to children missing in education; the role of the designated safeguarding lead and systems in College that support safeguarding and child protection;
- Will be provided with a copy of Part 1 /Annex A of ‘Keeping Children Safe in Education DfE,2022’ annually and receive annually updated training on their safeguarding roles and responsibilities;
- Should have an awareness of safeguarding issues that put young people at risk of harm and behaviours associated with these risks.
- Should know what to do if a learner makes a disclosure of abuse and never promise confidentiality when a disclosure is made;
- Will be made aware of the early help process and understand their role in it;
- Should be prepared to identify learners who may benefit from early help and will discuss early help requirements with the safeguarding lead in the first instance;
- May be required to support social workers and other agencies following a referral;
- Will be made aware of the process for making referrals to Children’s Social Care (through the MASH), understand statutory assessments and the role that they may be expected to play in such assessments;
- Should be prepared to make referrals to the MASH if they have concerns about a young person’s welfare and understand the role that they may be expected to play in such assessments;
- Will receive regularly updated safeguarding and child protection training including online safety;
- Will receive safeguarding updates throughout the year as part of continuous professional development;
- Should be able to contribute to the development of safeguarding policy and practice.
- Should always seek advice from the Designated Safeguarding Lead if they are unsure; and

- All teachers should safeguard children’s wellbeing and maintain public trust in the teaching profession as part of their professional duties (Teaching Standards, 2012).
- All staff should be aware that young people may not feel ready or know how to tell someone that they are being abused, exploited or neglected, and they may not recognise their experience as harmful. Staff should have professional curiosity and contact the DSL if they are concerned about a learner.

## 2.5 Governing body responsibilities

- Appoints a Designated Safeguarding Lead who is a member of the senior leadership team and who has undertaken training in inter-agency working, in addition to basic safeguarding training. This is carried out by Hannah Friend.
- Ensures that the DSL role is explicit in the role holder’s job description and that of the Deputy Designated Safeguarding Lead and that safeguarding responsibilities are identified explicitly in the job/role descriptions of all staff and volunteers.
- Ensure that **the College** takes into account local authority Safeguarding Children Partnership policies and supply information as requested by the safeguarding partners (the Local Authority, a clinical commissioning group for an area within the local authority and the chief office of police for a police area within the local authority);
- Governing bodies and proprietors **should** ensure that all governors and trustees receive appropriate safeguarding and child protection (including online) training at induction. This training **should** equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place in college are effective and support the delivery of a robust whole college approach to safeguarding. **Their training should be regularly updated.**
- Aware of the obligations under the Human Rights Act 1998 , the Equality Act 2010 and the Public Sector Equality Duty.
- Consider a whole College approach to online safety, including the use of mobile technology in College.
- Ensure that there are clear systems and processes in place for identifying when a young person may be experiencing mental health problems.
- Understand the local criteria for action and local protocol for assessment
- Recognises the importance of information sharing between practitioners and local agencies;
- Ensures that the DSL or a Deputy DSL is always available during College hours for staff to discuss any safeguarding concerns. The DSL or a Deputy DSL will generally be expected to be available in person but in exceptional circumstances availability will be via telephone.
- Ensures that the DSL or a Deputy DSL is always available at least via telephone or other media as above during any out of hours/out of term.
- Has a safeguarding policy and procedures, including a staff code of conduct, that are consistent with statutory requirements, reviewed annually and made available publicly on the College’s website or by other means.
- Ensures the College contributes to multi-agency working in line with statutory guidance.
- Responds and has procedures for dealing with allegations of abuse made against members of staff including supply staff, volunteers and contractors, including allegations made against the Principal and allegations against other learners.

- Follows safer recruitment procedures that include statutory checks on the suitability of staff to work with young people and adults at risk.
- Develops an induction strategy that ensures all staff, including the Principal, and volunteers receive information about the College's safeguarding arrangements, Staff Behaviour Policy (Code of Conduct) and the role of the DSL on induction.
- Develops a training strategy that ensures all staff, including the Principal, and volunteers receive appropriate and regularly updated safeguarding training including online safety and updates as required (at least annually) to provide them with the relevant skills and knowledge to safeguard effectively. The training strategy will also ensure that the DSL receives refresher training and regular updates as defined under the DSL's duties above.
- Ensures that all staff, including temporary staff and volunteers, are provided with copies of or access to the College's Young People and Adults at Risk Safeguarding Policy and Staff Behaviour Policy (Code of Conduct) before they start work at the College.
- Participates in the early help process and offers to initiate Early Help Single Assessments for learners with additional needs in order to provide a co-ordinated offer of early help.
- Appoints a designated lead to promote the educational achievement of learners who are looked after by the Local Authority.
- Teaches learners about safeguarding and how to keep themselves safe at all times, including when online, as part of a broad and balanced curriculum.

The Chair of Governors is responsible for liaising with the Local Authority and other agencies in the event of an allegation being made against the Principal.

The governing body will appoint a nominated governor for safeguarding who will lead on safeguarding issues for the governing body.

## **2.6 Principal's responsibilities**

- Ensures that the Young People and Adults at Risk Safeguarding Policy and procedures are reviewed annually and ratified by the governing body and adhered to by all staff.
- Allocates sufficient time, training, support and resources, including cover arrangements when necessary, to enable the DSL and deputy/s to carry out their roles effectively, including the assessment of learners and attendance at strategy discussions and other necessary meetings.
- Supports the Designated Lead for looked after young people to promote the educational achievement of any learner who is looked after by the Local Authority and who have left care through adoption, special guardianship or child arrangement orders or who were adopted from state care outside England and Wales.
- To ensure that all staff have the skills, knowledge and understanding necessary to keep looked after learners safe.
- Ensures that all staff feel able to raise concerns about poor or unsafe practice and that such concerns are handled sensitively and in accordance with the whistle blowing procedures.
- Ensures that learners are provided with opportunities throughout the curriculum to learn about safeguarding and how to keep themselves safe at all times, including when online, as part of a broad and balanced curriculum.

- Ensures that anyone who has harmed or may pose a risk of harm is referred to the Disclosure and Barring Service, as advised by the Designated Officer.
- Appoints a case officer who will be a member of the senior leadership team to investigate allegations concerning members of staff and volunteer.
- Safeguard children’s wellbeing and maintain public trust in the teaching profession as part of their professional duties (Teaching Standards, 2012); and
- Ensures that children’s and adults social care from a host or a placing authority have access to the College to conduct, or to consider whether to conduct a section 47 or section 17 assessment, as per ‘Keeping Children Safe in Education DfE 2022’.
- Ensures that the role of ‘Designated Safeguarding Lead’ is explicit in the role-holder’s job description;
- Organise appropriate cover for the role of Designated Safeguarding Lead for any out of hour/out of term activities.
- Appoint a lead for online safety (Simon Shackleton)
- Promotes a whole College approach to safeguarding
- Promote resilience to social and emotional wellbeing, which is tailored to the needs of the learners
- Ensures that all recruitment follows the ‘Safer Recruitment’ guidance and a single central record is maintained with details of all members of staff who are in contact with learners;
- Respond to allegations of abuse against all other members of staff including supply staff, volunteers and contractors.

### 3. Young People and Adults at Risk Protection Procedures

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#### 3.1 Recognising abuse

To ensure that all College learners are protected from harm, all staff will be trained in indicators of abuse, exploitation and neglect and should be able to recognise signs of these. We recognise that abuse, exploitation and neglect along with other safeguarding issues are complex and often multidimensional and therefore don’t fall solely under one category. Types of abuse or harm can take many forms including directly inflicting harm on a young person or failing to protect a young person from harm online as well as face to face both inside and outside of the College as well as the multi-faceted occurrence of factors causing emotional harm.

#### 3.2 Types of abuse

##### Physical abuse

Physical abuse is a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a young person or adult at risk. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child (this used to be called Munchausen’s Syndrome by Proxy, but is now more usually referred to as fabricated or induced illness).

## **Emotional abuse**

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

## **Sexual abuse**

Sexual abuse involves forcing or enticing a young person or adult at risk to take part in sexual activities. 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 young people or adults at risk in looking at, or in the production of, sexual images, watching sexual activities, encouraging them to behave in sexually inappropriate ways or grooming them in preparation for abuse (including via the internet).

**Sexual exploitation** involves an individual or group of adults taking advantage of the vulnerability of an individual or groups of young people. Victims can be boys or girls. Young people are often unwittingly drawn into sexual exploitation through the offer of friendship and care, gifts, drugs, alcohol and sometimes accommodation. Sexual exploitation is a serious crime and can have a long-lasting adverse impact on a learner's physical and emotional health. It may also be linked to the trafficking of children.

The sexual abuse of young people or adults at risk of harm by other young people is a specific safeguarding issue in education and all staff should be aware of it and the College policy and procedures for dealing with it.

**Child sexual exploitation (CSE) and Child Criminal Exploitation (CCE)** is a form of child sexual abuse, it occurs when an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a person under the age of 18 into sexual activity. This is in exchange for something the victim needs or wants and/or for the financial advantage of increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. CSE does not always involve physical contact it can also occur through the use of technology.

The College teaches learners about consent and the risks of sexual exploitation in PSHE and the curriculum. A common feature of sexual exploitation is that the young person often does not recognise the coercive nature of the relationship and does not see her/himself as a victim. The young person may initially resent what she/he perceives as interference by staff but staff must act on their concerns, as they would for any other type of abuse.

CSE and CCE can affect any child or young person, female or male, under the age of 18 years, including 16 and 17-year olds who can legally give consent to have sex.



Sexual exploitation can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity and may occur without the child or young person's immediate knowledge (e.g. through others copying videos or images they may have created and posted on social media).

Young people are often unwittingly drawn into sexual and/or criminal exploitation through the offer of friendship and care, gifts, drugs, alcohol and sometimes accommodation. CSE is a form of child sexual abuse including physical contact and non-contact online activities including the internet or by phone. This can happen over time or as a one off and may happen without the child recognising this as abuse or harmful.

Child criminal exploitation may include activities such as:

- a young person travelling outside the area in which she/he lives in order to transport, distribute or sell drugs or money for others by whom they are being exploited. This form of criminal activity and exploitation is referred to as county lines (see below);
- a young person committing crimes on behalf of or at the behest of others because they, their friends or relatives have been threatened, deceived or manipulated;
- a young person being forced to shoplift or pickpocket;
- a young person being forced to threaten other young people;
- a young person being forced to work in a cannabis factory;
- a young person being forced to commit crime in order to settle actual or fabricated debts;
- gang membership, which may lead to the young person being exploited to do something illegal or dangerous in return for kudos/status in the gang;
- a young person being encouraged or manipulated to commit crime via social media;
- a young person receiving food, money, kudos or status in return for storing a weapon or drugs for others.

All staff are trained to be vigilant about and report indicators of CSE and CCE including:

- Young people appearing with money, clothes, mobile phones, etc. without plausible explanation;
- Young people who associate with other young people involved in exploitation;
- Young people in relationships with controlling or significantly older individuals or groups;
- Young people frequenting areas known for sex work and/or criminal activity;
- Young people who associate with gangs and/or become isolated from their peers/social networks;
- Young people receiving excessive texts/phone calls;
- multiple callers (unknown adults or peers) to young people;
- concerning use of internet or other social media by young people;
- increasing secretiveness around young people's behaviours;
- Young people presenting inappropriate sexualised behaviour for their age and/or with sexually transmitted infections and/or becoming pregnant;
- Young people self-harming or presenting with significant changes in their emotional well-being;

- Young people who misuse drugs and alcohol;
- Young people who go missing for periods of time or regularly come home late;
- Young people who regularly miss school or education, have unexplained absences or do not take part in education;
- Young people being exposed to or perpetrating serious levels of violence; and/or being manipulated or forced into excessive violence towards others by somebody who is exploiting them
- evidence of/suspicions of young people suffering physical or sexual assault.

All staff are made aware of the indicators of CSE & CCE of learners and all concerns are reported immediately to the DSL. The DSL will consider the need to make a referral to Social Care via the MASH.

### **Neglect**

Neglect is the persistent failure to meet the basic physical and/or psychological needs of a young person or adult at risk, likely to result in the serious impairment of their health or development. Neglect may involve a parent or carer failing to:

- provide adequate food, clothing and shelter (including exclusion from home or abandonment);
- protect a young person or adult at risk from physical and emotional harm or danger;
- ensure adequate supervision (including the use of inadequate care-givers); or
- ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, basic emotional needs.

### **Financial or material abuse**

This applies to largely adults at risk of harm and relates to circumstances where trust in relation to financial matters is abused. It includes theft, fraud, exploitation, pressure in connection with wills, property or inheritance or financial transactions, or the misuse or misappropriations of property, possessions or benefits.

### **Domestic abuse**

Domestic abuse is defined as 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 Domestic Abuse Act 2021 creates a statutory definition of domestic abuse.

### **Domestic Abuse Act 2021**

'Abusive behaviour' is defined in the act as any of the following:

- physical or sexual abuse
- violent or threatening behaviour
- controlling or coercive behaviour
- economic abuse
- psychological, emotional or other abuse

For the definition to apply, both parties must be aged 16 or over and 'personally connected'.

**'Personally connected'** is defined in the act as parties who:

- are married to each other
- are civil partners of each other
- have agreed to marry one another (whether or not the agreement has been terminated)
- have entered into a civil partnership agreement (whether or not the agreement has been terminated)
- are or have been in an intimate personal relationship with each other have, or there has been a time when they each have had, a parental relationship in relation to the same young people are relatives

The Act recognises children as victims of domestic abuse in their own right, statutory obligations to victims of domestic abuse are afforded to young people too.

All young people or adults at risk can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members.

Controlling behaviour is: a range of acts designed to make a person subordinate and/or dependent by isolating them from sources of support, exploiting their resources and capacities for personal gain, depriving them of the means needed for independent resistance and escape and regulating their everyday behaviour. Coercive behaviour is: an act or pattern of acts of assault, threats, humiliation and intimidation or other abuse that is used to harm, punish or frighten their victim.

All concerns about young people being affected by domestic abuse will be reported to the DSL as with any other safeguarding concern. The DSL will respond to the report by consulting Children's Social Care in order to establish whether a referral is required or the situation should be managed by discussion with parents/carers and possibly the offer of early help.

### **Modern Slavery**

This applies to learners who are or who may be coerced into unpaid work, who have no human right or who are forced into compulsory labour. Have poor living conditions with little or no access to amenities or domestic servitude. They may be treated as a commodity or bought and sold at property, physically constrained or have restrictions placed on their freedom of movement.

### **Child criminal exploitation including County lines**

As set out in the 'Serious Violence Strategy' published by the Home Office in 2018, this is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs within the UK using dedicated mobile phone lines or other forms of communication. They are likely to exploit young people and adults at risk to move and store drugs and money, they will often use cohesion, intimidation, violence (including sexual violence) and weapons.

### **Self-neglect**

This applies to learners who may have poor self-care leading to a decline in person hygiene, poor nutrition, poor healing or poorly maintained clothing. It may mean that there is a refusal to take medication and a refusal to accept or receive intervention.

### **Discriminatory**

Jokes or comments that are racist, sexist, homophobic, ageist or based on a person's disability, any other form of abuse based on prejudice, not providing for an individual's cultural or religious beliefs, not providing accessible services, ignoring sexual orientation of learners.

### **Organisational**

Not offering flexibility and choice for learners, having poor standards of care, lack of inadequate procedures. Poor record keeping or lack of management overview and support. Insufficient staffing, abusive or disrespectful attitudes toward learners, not offering choice or promoting independence, misuse of medication. Failure to respond to abuse appropriately.

### **Fabricated or induced illness**

Fabricated or induced illness is a condition whereby a young person or vulnerable adult has suffered, or likely to suffer, significant harm through the deliberate action of their parent/carer and which is attributed by the parent/carer to another cause.

### **Faith-based abuse**

The psychological manipulation and harm inflicted on a person by using the teachings of their religion.

### **Gangs/youth/serious violence**

Young people and vulnerable adults who are exposed to gangs, gang-related activity and youth violence - whether through their family, their peers, the area they live in, or the internet and social media - are potentially at risk of significant harm of being drawn into violent or negative behaviour.

All staff should be aware of indicators, which may signal that young people 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 a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs.

Advice for schools and colleges 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.

## **Gender-based violence**

Violence Against Women and Girls (VAWG) is the term given to all forms of violence and abuse experienced disproportionately by women and girls, or experienced by them because of their gender, including rape, domestic violence, forced marriage, FGM and sexual harassment.

## **Hate**

Hate crimes are any crimes that are targeted at a person because of hostility or prejudice towards that person because of their disability, race or ethnicity, religion or belief, sexual orientation or transgender identity.

Definitions taken from *Working Together to Safeguard Children* (HM Government, 2018).

## **4. Multi-agency working**

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The College is committed to multi-agency working and operates under Working Together to Safeguard Children (2018) and local safeguarding arrangements. The College will work with social care, the police, health services, local Early Help practitioners and other relevant agencies to promote the welfare of young people and protect them from harm.

We will work closely with our local Family Hub to ensure young people receive appropriate, coordinated Early Help.

The Coventry Safeguarding Children's Partnership (CSCP) have designated that Colleges are named 'relevant agency' As such the College is under a statutory duty to co-operate with published CSCP arrangements.

## **5. Early Help and use of the Early Help Assessment Process**

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The College recognises that providing early help is more effective in promoting the welfare of young people than reacting later. Early help means providing support as soon as a problem emerges, at any point in a young person's life. 'Keeping Children Safe in Education DfE 2022' emphasises that all staff should be aware of the early help process and understand their role in it. All staff are therefore trained and required to notice any concerns about young people which may help to identify that they would benefit from early help; to record those concerns on CPOMS; and to share their concerns with the Designated Safeguarding Lead (or a Deputy DSL). The College works closely with its neighbouring family hub to work with families in the community to improve outcomes for young people.

The College recognises that any young person can be the victim of abuse and may benefit from early help. However, the College will be particularly vigilant to potential need for early help if a young person;

- is disabled or has certain health conditions and has specific additional needs;
- has special educational needs (whether or not they have a statutory education, health and care plan);
- has a mental health need;
- is a young carer;
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines;
- is frequently missing/goes missing from care or from home;
- is a risk of modern slavery, trafficking, sexual or criminal exploitation;
- is misusing drugs or alcohol themselves;
- has a family member in prison, or is affected by parental offending;
- is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health problems or domestic abuse;
- has returned home to their family from care;
- is showing early signs of abuse and/or neglect;
- is at risk of being radicalised or exploited;
- is at risk of 'honour-based' abuse such as Female Genital Mutilation or Forced Marriage;
- is persistently absent from education, including persistent absences for part of the school day;
- is a privately fostered.

The College will keep the needs and circumstances of young person receiving early help under constant review. If the young person's situation does not improve and/or the young person's parents and/or the young person do not consent to early help, the College will make a judgement about whether, without help, the needs of the young person will escalate. If so, the College will seek the parents' consent to a referral to a multi-agency Locality Panel in order to address the young person's needs. Alternatively, a referral to Children's or Adults Social Care may be necessary.

## 6. Procedure for Reporting Concerns about a Learner

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### 6.1 Five R's model

The College will adopt the five R's model for dealing with concerns or disclosures regarding any learner. These are: **Recognise, Respond, Record, Report and Refer.**

#### 6.1.1 Recognise

A learner may disclose sensitive information at any time of the day or night. It is therefore imperative that all staff are aware of the signs and behaviours which may indicate abuse. All staff will be alert to indicators of abuse and will report any of the following to the Designated Safeguarding Lead immediately;

- Any concern or suspicion that a young person has sustained an injury outside what is reasonably attributable to normal activity;
- Any concerning behaviours exhibited by young people that may indicate that they have been harmed or are at risk of harm, including unusual changes in mood or behaviour, concerning use of language and/or concerning drawings or stories.
- Any significant changes in attendance or punctuality;
- Any significant changes in a young person's presentation; including new expensive items;
- Any concerns relating to people who may pose a risk of harm to a young person;
- Any disclosures of abuse that young people have made;

In addition, the College recognises that abuse can take many different forms. Action will be taken if the College believes that a young person is at risk of or is the victim of;

- bullying, including cyber- or online-bullying;
- child criminal exploitation (including involvement in county lines);
- child sexual exploitation;
- domestic abuse;
- emotional abuse;
- fabricated or induced illness;
- faith-based abuse;
- female genital mutilation;
- forced marriage;
- gangs or youth violence;
- gender-based violence;
- hate;
- mental health;
- neglect;
- child on child abuse;
- physical abuse;
- radicalisation;
- relationship abuse;
- serious violence and harassment;
- sexual abuse;
- sexual violence or sexual harassment (including peer on peer abuse);
- sharing of consensual or non-consensual nude and semi-nude images/videos;
- So-called 'honour-based' abuse;
- trafficking and modern slavery.

### 6.1.2 Respond

When receiving a disclosure from a learner the member of staff must:

- Find time and, if necessary, a suitable place to listen to the learner, when a disclosure is reported.
- Listen to what is being said without displaying shock or disbelief.
- Not make false promises which may not be able to be fulfilled and not promise confidentiality.
- If the learner asks that information is kept secret, it is important that the learner is informed, in a manner appropriate to the learner's age/stage in development, that complete confidentiality cannot be promised.

- The learner must be informed that there may be a need to pass information to other professionals to help keep the learner, or other learners, safe.
- Report disclosure to the DSL as soon as possible.
- Record the disclosure on CPOMS.
- Allow the learner to talk freely. Do not cross examine, interview, probe or ask to see any injury that is not visible. Listen, only asking questions when necessary to clarify.
- Not criticise the alleged perpetrator.
- Reassure the learner that what has happened is not his or her fault.
- Stress that it was the right thing to tell.
- Explain what has to be done next and who has to be told.

Find out just enough to be sure of the need to refer, and keep any questions open rather than closed. An incident may eventually end up as a court case and learner's evidence can all too easily be compromised by leading questions or repeated recital.

### **6.1.3 Record**

Records that are factual, accurate and relevant and avoid subjective judgements using the College's CPOMS system should be made. It is not the responsibility of the College to 'check out' what any learner tells, nor should any abuser be questioned. All concerns for learners should be recorded as soon as possible and within one hour using the College's CPOMS system.

### **6.1.4 Report**

The member of staff who has recorded the concern, or received the disclosure, must report the concern/disclosure to the DSL, or in their absence, a Deputy DSL, immediately by completing a referral form on the CPOMS system and calling on 6280.

If a disclosure is made by a residential learner between the hours of 12.00am and 7am, the member of the SLT who is on call should be notified immediately. The SLT member on call will advise of any immediate action to be taken and then inform the DSL of any actions taken at the earliest opportunity during the next working day.

### **6.1.5 Refer**

When the DSL, or in their absence, a Deputy DSL, has been informed, they will make the decision whether or not to refer the concern to social care or the police.

For referrals concerning learners under 18 years of age, the DSL should use the Coventry Safeguarding Children Board's document 'Children's Social Care Thresholds and Practice Standards' for guidance. If in doubt, the receiving team will determine whether a safeguarding enquiry is required or if not, what other measures may need to be taken.

The Initial Contact Service will be consulted when there is uncertainty about whether to refer. Referrals must be made as soon as possible and the appropriate forms completed and sent at the same time.

All referrals to these external agencies should be followed up by the College within 24 hours until a written response is received.



If a learner does not live in Coventry, a different referral process may need to be followed for learners. If the disclosure/concern is related to events happening at the College, the DSL should follow the referral process as above.

If the disclosure/concern relates to events happening outside of College (e.g. at home), the DSL should refer the concern to the “home” Local Authority where the learner lives.

## 6.2 Submitting referrals

All referrals relating to learners under 18 should be made to the Multi-Agency Safeguarding Hub (MASH) by completing a referral form and submitting it to the MASH at:-

Coventry Multi-Agency Referral Form (MARF)

Telephone: 024 7678 8555

Online Referral:

[https://myaccount.coventry.gov.uk/service/Children s Services Multi agency referral and initial information](https://myaccount.coventry.gov.uk/service/Children_s_Services_Multi_agency_referral_and_initial_information)

For learners aged over 18, referrals should be made to Adult Social Care.

On 024 7683 3003 or by email to [ascdirect@coventry.gov.uk](mailto:ascdirect@coventry.gov.uk) or through online referral:

[https://myaccount.coventry.gov.uk/en/service/adult Social Care Referral form](https://myaccount.coventry.gov.uk/en/service/adult_Social_Care_Referral_form)

If there is no immediate danger or you need advice or information, you should call MASH on 02476 788555 or if immediate action is needed dial 999.

## 6.3 Staff reporting directly to external agencies

Staff should ordinarily follow the reporting procedures outlined in this policy. However, as emphasised in *‘Keeping Children Safe in Education DfE 2022’*, any staff member can refer their concerns directly to Children’s Social Care and/or the Police if:

- the situation is an emergency and the DSL, the Deputy DSL, the Principal and/or the Chair of Governors are all unavailable;
- they are convinced that a direct report is the only way to ensure the learner’s safety; or
- for any other reason they make a judgement that a direct referral is in the best interests of the learner.

In any of those circumstances, staff may make direct referrals and share information without being the subject of censure or disciplinary action. However, staff should inform the DSL at the earliest opportunity that they have done so unless in their judgement doing so would increase the risk of harm to the young person or adult at risk.

## 6.4 Position of trust

All adults working with young people and adults at risk of harm in College are in a position of trust in relation to these learners. A relationship between a member of staff, volunteer or contractor and a learner cannot be a relationship between equals. There is potential for exploitation and harm of the learner, and all staff have a responsibility to ensure that an unequal balance of power is not used for personal advantage.

In addition, staff should understand that, under the Sexual Offences Act 2003, it is an offence for a person over the age of 18 to have a sexual relationship with a person under the age of 18, where that person is in a position of trust, even if the relationship is consensual. This means that any sexual activity between a member of staff and a learner under 18 may be a criminal offence, even if that learner is over the age of consent.

The College's Staff Behaviour Policy (Code of Conduct) sets out the expectations of staff and is signed by all staff members.

## **7. Procedure for Reporting Concerns about Staff, Volunteers or Visitors**

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### **7.1 Whistleblowing**

All staff and volunteers are able to raise concerns about poor or unsafe practice and potential failures in the safeguarding regime and concerns will be taken seriously. Appropriate whistleblowing procedures, which are suitably reflected in staff training and staff conduct policies, are in place for such concerns to be raised. Further information and guidance is available in the College's 'Whistleblowing Policy'.

Staff are expected to report all concerns about poor practice or possible abuse by colleagues to the Vice Principal for Safeguarding & Pastoral Care (DSL), who will inform the Principal and facilitate proactive and early intervention in order to maintain appropriate boundaries and a safe culture that protect young people and adults at risk and reduces the risk of serious abuse in College. Concerns or complaints about the Principal should be reported to the Chair of Governors. Staff may also report concerns about suspected abuse or neglect directly to Children's Social Care or the Police if they believe direct reporting is necessary to secure action to safeguard young people. The NSPCC whistleblowing helpline is also available for staff who do not feel able to raise concerns regarding child protection failures internally. Staff can call 0800 028 0285 between 8.00a.m. and 8.00p.m. Monday to Friday or e mail [help@nspcc.org.uk](mailto:help@nspcc.org.uk).

### **7.2 Allegations against staff**

When an allegation is made against a member of staff, they have the right to have their case dealt with fairly, quickly and consistently and to be kept informed of its progress. Allegations about a staff member must be reported immediately to the Vice-Principal for Safeguarding & Pastoral Care (Lead DSL) or the HR Manager. In their absence, the allegation should be reported to go to the Principal who will follow the process detailed below. A member of staff who receives an allegation about another member of staff from a young person or adult at risk of harm will follow the guidelines in section 4 for dealing with disclosure. Allegations against a staff member will be assessed by the Vice-Principal for Safeguarding & Pastoral Care and the HR Manager. In order to assess the allegations against a member of staff, it will be judged against the relevant criteria highlighted below. This applies to all cases in which it is alleged that an individual who works or volunteers with young people or adults at risk of harm has:

- Behaved in a way that has harmed a young person or may have harmed a young person
- Staff behaving towards a young person in a way that indicates they may not be suitable to work with young people. (Including behaviour outside of work). This is known as 'Transferable risk'.
- Possibly committed a criminal offence against or related to a young person or

- Behaved towards a young person in a way that indicates they may pose a risk of harm to young people.

The Vice-Principal for Safeguarding & Pastoral Care or HR Manager will inform the LADO within one working day of receiving the allegation, if the case meets the relevant criteria. Where the cases may not appear to meet the relevant criteria fully but still gives rise to concerns about the risk an individual pose to young people through their work, the College will seek advice from the (LADO) for the most appropriate course of action.

Suspension of a member of staff is not the default option; alternatives to suspension will always be considered. In some cases, however, a member of staff may be suspended where this is deemed to be the best way to ensure that allegations are investigated fairly, quickly and consistently and that all parties are protected. In the event of suspension, the College will provide support and a named contact for the member of staff.

Allegations made against the Principal should be reported to the Chair of Governors. Any allegations regarding the Senior Leadership Team should be reported to the Principal. The Chair of Governors and/or Principal would follow the same process in assessing the relevant criteria and reporting to the LADO if the case meets the criteria. If an allegation or concern is made about a Governor, the DSL will work with the Chair of Governors to follow local procedures outlined by the LADO. If an allegation is made about the Chair of Governors the DSL/Principal will contact LADO for direction and the DoFE.

Although the College does not directly employ supply teachers, the College will ensure that any concerns or allegations against supply teachers are handled properly. The College will never cease to use a supply teacher for safeguarding reasons without liaising with the Local Authority Designated Officer and reaching a suitable outcome. Human resources manager will liaise with the supply agency to determine whether to suspend or redeploy the supply teacher whilst they carry out their investigation. The College will inform supply agencies of its process for managing allegations, including inviting the agency's human resource manager (or equivalent) to meetings and regularly updating agencies on relevant College policies.

A referral to the Disclosure and Barring Service will be made if a member of staff is dismissed or removed from their post as a result of safeguarding concerns, or would have been removed if they had not have resigned.

Where false allegations or allegations without foundation are found the HR Manager will: -

- Prepare a report outlining the allegations and giving the reasons for the conclusion that it had no foundation.
- Inform the member of staff about whom the allegation was made both orally and in writing that no further action will be taken.
- Reassure the member of staff of the College's understanding of the personal impact that false allegations may have and the support the College will continue to offer.

Documents relating to an investigation will be retained in a secure place, together with a written record of the outcome and, if disciplinary action is taken, details will be retained on the member of staff's file and stored in accordance with the Disciplinary Policy & Procedure.

Staff, parents and governors are reminded that publication of material that may lead to the identification of a staff member who is the subject of an allegation is prohibited by law. Publication includes verbal conversations or in writing, including content placed on social media sites.

In accordance with *'Keeping Children Safe in Education DfE 2022'*, the College will make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered.

### 7.3 Low Level Concerns

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

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

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

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

Where staff have a Low-level concern about a staff member they should share this via CPOMS through the incident category 'staff safeguarding concern' or directly to the HR Manager or Vice Principal for Safeguarding and Pastoral Care, for further assessment. Incidents of Low-Level concerns will be shared with the Principal.

Low-level concerns which are shared about supply staff and contractors **should** be notified to their employers, so that any potential patterns of inappropriate behaviour can be identified.

## 8. Informing the ESFA (Education and Skills Funding Agency) about serious safeguarding incidents

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Colleges receiving annual funding allocations from the Education and Skills Funding Agency (ESFA) for the provision of 16-19 education are required through the funding agreements and contracts to inform the ESFA of serious safeguarding incidents when: -

- **The organisation, or one of its subcontractors is itself the subject of an investigation by the local authority or the police.**

In such circumstances, the Chair or Chief Executive or senior DSL will email [Enquiries.EFA@education.gov.uk](mailto:Enquiries.EFA@education.gov.uk) with details of the nature of the incident and confirmation that it is or is scheduled to be investigated by the local authority and/or the police.

- **Safeguarding referrals for ESFA funded learners that result in police investigations**

In such circumstances, the DSL will email [Enquiries.EFA@education.gov.uk](mailto:Enquiries.EFA@education.gov.uk) with details of the safeguarding incident and confirmation that it is under investigation by the police. It is not required that any information that identifies individuals or impacts on data protection duties is disclosed.

- **The organisation, or one of its subcontractors is the subject of an investigation by the local authority or the police in connection with a Prevent issue.**

In such circumstances, the Chair or Chief Executive or senior DSL will email [Enquiries.EFA@education.gov.uk](mailto:Enquiries.EFA@education.gov.uk) with details of the nature of the incident and confirmation that it is or is scheduled to be investigated by the local authority and/or the police.

- **Disclosure and Barring Service referrals**

The DSL will notify the ESFA that a referral has been made, no other information is required.

## 9. Complaints Procedure

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The College complaints procedure will be followed where a learner or parent raises a concern about poor practice towards a learner that initially does not reach the threshold for action under this policy. Complaints are managed by the Vice Principal for Curriculum and Quality. Complaints from staff are dealt with under the College's complaints and disciplinary and grievance procedures. Complaints which escalate into a safeguarding concern will automatically be managed under the College's safeguarding procedures.

## 10. Assessing Risk

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Individual learner risk assessments are held on each individual learner's file providing information to support the management of risk in delivering the learner's individual learning programme. The aim is to ensure that the balance of risk against achieving progression remains central to the work of the College, supporting learners to become less vulnerable, more skilled and increasingly independent within the community.

Through admissions and continuous individual learner risk assessments the College identifies learners who may be considered more vulnerable due to their physical and or emotional problems and levels of understanding of risk. These risk assessments are maintained by the Safeguarding & Risk Manager in conjunction with identified key staff who ensure that the documents remain responsive to the learner's wellbeing and support requirements. These records include quantifying levels of risk and College actions to address them. The College supports all vulnerable learners and has a Designated Lead for looked after young people and a Designated Lead for E-safety.

Individuals in one-to-one situations with learners are more vulnerable to allegations. Staff and learners should recognise this possibility and plan and conduct such meetings accordingly. Every attempt should be made to ensure the safety and security needs of both staff and learners. Pre-arranged meetings with learners away from the College premises are not being permitted unless approval is obtained from the learner's parents/carers and the DSL.

Individuals must:

- Avoid meetings with learners in remote, secluded areas of the College.
- Ensure there is visual access and/or an open door in one-to-one situations.
- Inform other staff of the meeting beforehand, assessing the need to have others present or close by.
- Always report to SLT any situation where a learner becomes distressed or angry
- Consider the needs and circumstances of the learner involved.

If learners are in 1:1 situation with either their peers or adults in a position of trust, then depending upon whether this is an open or closed environment the activity needs to be fully risk-assessed to mitigate potential risks.

## **11. 14 – 16 Year Olds**

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The College will work collaboratively with the appropriate Local Authority/ school in order to share information about the attendance and/or absences of a learner who is 14-16 as the Local Authority deems necessary.

The College will inform the relevant Local Authority immediately if a learner is removed from roll so that the Local Authority can as part of their duty identify children of compulsory school age who are missing education.

Where an allegation, suspicion or incident is reported, the College will notify the head teacher or other senior manager with safeguarding responsibility of the relevant school/Local Authority as soon as possible.

In all other respects, such allegations, suspicions or incidents will be managed in accordance with the College policy and procedure.

## **12. Staff Training**

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It is important that all staff have training to enable them to recognise the possible signs of abuse, neglect and exploitation and to know what to do if they have a concern.

New staff and volunteers who will have direct contact with young people and adults at risk will receive an explanation during their induction which will include:

- The College's Young People and Adults at Risk Safeguarding Policy
- Copies of Part 1 and Annex A of 'Keeping Children Safe in Education (DFE 2022)'
- The Staff Behaviour Policy (Code of Conduct)
- Behaviour Policy

The College Young People and Adults at Risk Safeguarding Policy, Copies of Part 1 and Annex A of Keeping Children Safe in Education (DFE 2022) and Staff Behaviour Policy (Code of Conduct) will be sent with the letter confirming an appointment with a written requirement that the individual reads the two policies in advance of starting work at the College. The individual will be given an opportunity to clarify any issues on their first day at work and then asked to sign to confirm that they have read and understood both policies and undertake to comply with them.

All staff will be issued annually the Copies of Part 1 and Annex A of Keeping Children Safe in Education (DFE 2022), the Staff Behaviour Policy (Code of Conduct) and the College's Young People and Adults at Risk Safeguarding Policy.

All staff, including the Principal, volunteers and governors will receive appropriate and regularly updated safeguarding training and thematic updates as required (at least annually) during inset days and regular discussions at staff meetings, to provide them with the requisite skills and knowledge to safeguard effectively in line with statutory guidance.

The Lead and Deputy DSLs will attend refresher training every two years.

All staff will be made aware of the increased risk of abuse to certain groups, including learners with special educational needs and disabilities, looked after young people, previously looked after young people, young carers and risks associated with specific safeguarding issues including child sexual exploitation, peer on peer abuse, sexual harassment and sexual violence in College, county lines activity, extremism, so-called honour based abuse including female genital mutilation and forced marriage; and will receive training in relation to keeping young people safe online.

In addition, at least one governor and a member of the senior leadership team will attend safer recruitment training.

Supply staff and other visiting staff will be given the Colleges safeguarding for visitor's information leaflet.

## **13. Safer Recruitment**

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### **13.1 Recruitment**

The College ensures it does its utmost to employ 'safe' staff and allow 'safe' volunteers to work with learners by following the guidance in '*Keeping Children Safe in Education DfE 2022*'.

Safer recruitment means that all applicants will:

- Undergo an identity check, DBS clearance, Prohibition from teaching checks (where required), barred list check, section 128 check (as required).
- complete an application form which includes their employment history and explains any gaps in that history.
- provide two referees, including at least one where available who can comment on the applicant's suitability to work with learners.
- provide evidence of qualifications.

- if offered employment, be checked in accordance with the Disclosure and Barring Service (DBS) regulations as appropriate to their role. This will include an enhanced DBS check and a barred list check for those engaged in Regulated Activity.
- if offered employment, provide evidence of their right to work in the UK.
- Verification of the candidates mental and physical fitness may also be sought.

The College will also:

- ensure that every job description and person specification for roles in College includes a description of the role holder's responsibility for safeguarding.
- ask at least one question at interview for every role in College about the candidate's attitude to safeguarding and motivation for working with learners.
- verify the preferred candidate's mental and physical fitness to carry out their work responsibilities.
- obtain references for all shortlisted candidates, including internal candidates where applicable.
- carry out additional or alternative checks for applicants who have lived or worked outside the UK.
- ensure that applicants for teaching posts are not subject to a prohibition order issued by the Secretary of State.

All record of all checks on members of staff will be held on the Single Central Record.

Any visitor to the College who has not been subject to the necessary checks will be supervised at all times and risk assessed.

At least one member of each recruitment panel will have attended safer recruitment training within the last two years.

All new members of staff and volunteers will undergo an induction that includes familiarisation with the College Young People and Adults at Risk Safeguarding Policy and Staff Code of Conduct.

All staff are required to sign to confirm they have received a copy of the Young People and Adults at Risk Safeguarding Policy and Staff Code of Conduct.

The College will obtain written confirmation from supply agencies and third party organisations that they have satisfactorily undertaken all appropriate checks in respect of individuals they provide to work in the College that the College would have undertaken if they were employing the individual directly.

Trainee teachers will be checked either by the College or by the training provider, from whom written confirmation will be obtained.

The College maintains a single central record of recruitment checks undertaken and ensures that the record is maintained in accordance with section 3 of '*Keeping Children Safe in Education DfE 2022*'.

All governors will be the subject of Enhanced DBS checks as defined in '*Keeping Children Safe in Education DfE 2022*'.



## 14. Site Security

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Visitors to the College, including contractors, are asked to sign in and are given an identity badge, which confirms they have permission to be on site. All visitors to the site are accompanied by a member of staff at all times whilst on the campus. All visitors are expected to observe the safeguarding and health and safety regulations to ensure learners in College are kept safe.

The College has a Visible ID Policy which requires that both staff and learners are required to wear their identity badge whilst on campus at all times.

## 15. Record Keeping

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The College will maintain safeguarding (including early help) records in accordance with the safeguarding policy.

The College will:

- keep clear detailed records of concerns about young people and adults at risk (noting the date, event and action taken), even where there is no need to refer the matter to Social Care immediately;
- ensure all records are kept secure and in locked locations;
- ensure all relevant safeguarding records are sent to the receiving School, College or other education establishment as soon as possible when a learner moves. Where a learner leaves in year or within the first week of new term the DSL should ensure secure transit within 5 working days. The DSL will obtain a confirmation receipt as evidence of transferal.
- ensure that incoming safeguarding records are brought to the attention of the DSL, Deputy DSLs and other key staff such as the SENCO when a young person transfers in from another School or College.
- Safeguarding records will be maintained independently from the learner's file. Such records will only be accessible to the Designated Safeguarding Lead and staff who need to be aware.

Such records will include, in addition to the name, address and age of the learner, timed and dated observations describing the learner's behaviour, appearance, statements/remarks made to staff or other learners and observations of interactions between the learner, other learners, members of staff and/or parents/carers that give rise to concern. Where possible and without interpretation, the exact words spoken by the learner or parent/carer will be recorded. Records will be signed, dated and timed electronically by the member of staff making the record and securely stored on the College CPOMs system.

Safeguarding records are normally exempt from the disclosure provisions of the Data Protection Act 2018, which means that learners and parents do not have an automatic right to see them. If any member of staff receives a request from a learner or parent to see safeguarding records, they should refer the request to the Data Protection Officer (DPO) who will advise accordingly.

The Data Protection Act and General Data Protection Regulation (GDPR) 2018 does not prevent the College from sharing information with relevant agencies for the purposes of keeping children safe. Fears about

sharing information must not be allowed to stand in the way of the need to promote the welfare and safety of young people. Advice should be sought from the DSL prior to any disclosure.

## 16. Confidentiality and Information Sharing

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All staff will understand that safeguarding issues warrant a high level of confidentiality, not only out of respect for the learner, family and staff involved but also to ensure that information being released into the public domain does not compromise evidence.

The Data Protection Act 2018 (DPA) and the GDPR places duties on the Colleges and individual staff to process personal information fairly and lawfully and to keep the information they hold safe and secure.

However, neither the DPA nor the GDPR prevent or limit the sharing of information for the purposes of keeping children safe. KCSiE 2022 states clearly that “Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare of children”.

Staff will ensure confidentiality protocols are adhered to and information is shared appropriately. If in any doubt about confidentiality, staff will seek advice from the DSL as required. It is reasonable for staff to discuss day-to-day concerns about learners with colleagues in order to ensure that their general needs are met in College. However, staff should report all safeguarding concerns to the DSL.

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

Every effort will be made to prevent unauthorised access to sensitive information. Any sensitive information that needs to be stored on portable devices such as laptop computers or tablets or on portable media such as a flash drive will be password protected or encrypted and kept in locked storage.

When a young person leave College, the DSL **should** ensure their child protection file is transferred to the new College as soon as possible, and within 5 days for an in-year transfer or within the first 5 days of the start of a new term to allow the new College to have support in place for when the young person arrives. The DSL **should** ensure secure transit, and confirmation of receipt should be obtained.

## 17. Off-Site Arrangements

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All extended and off-site activities are subject to a risk assessment to satisfy health and safety and safeguarding requirements. When learners attend off-site activities, including day and residential visits and work-related activities, the College will check that effective safeguarding arrangements are in place.

Where extended College activities are provided by and managed by the College, the College’s Young People and Adults at Risk Safeguarding Policy and procedures apply. If other organisations provide services or activities on the College site, the College will check that those organisations have appropriate procedures in place, including safer recruitment procedures.

## **18. Work Experience and Supported Internships**

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The College has detailed procedures to safeguard learners undertaking work experience and supported internships, including arrangements for checking people who provide placements and supervising learners on work experience which are in accordance with the guidance in 'Keeping Children Safe in Education DfE 2022'.

## **19. Residential Settings**

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Research has shown that young people and adults at risk can be particularly vulnerable in residential settings. The College complies with the National Minimum Standards and is appropriately inspected by the Care Quality Commission. Staff are alert to inappropriate relationships, initiation type behaviours and the potential for peer on peer abuse. Staff receive additional induction and safeguarding training tailored to meet their specific, additional duties. The Head of Care and Care Managers have all undertaken DSL training.

## **20. Intimate Care**

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The College actively promotes the health care of each learner and meets any intimate care needs as detailed in individual care plans as necessary. The College has a written policy, implemented in practice, on the administration of medication within the College.

## **21. Safeguarding Learners with Special Educational Needs and Disabilities or physical and/or mental health needs.**

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As outlined in Keeping Children Safe in Education (DfE 2022), the College is aware that young people with additional needs or disabilities may be more vulnerable to abuse and additional barriers may exist when recognising abuse and neglect. This could be due to:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the young person's disability without further exploration;
- being more prone to peer group isolation or bullying than other young people;
- the potential for young people with SEN and disabilities or certain medical conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs; and
- communication barriers and difficulties in overcoming those barriers.

Staff are trained to manage these additional barriers to ensure this group of young people are appropriately safeguarded; and are aware that mental health difficulties can, in some cases, be an indicator that a young person has suffered or is at risk of suffering abuse, neglect or exploitation.

Staff are not expected or trained to diagnose mental health conditions or issues but they will record and report any concerns about a young person's mental health to the Designated Safeguarding Lead as with any other safeguarding concern, recognising that mental health concerns may be an outcome and/or indicator of wider safeguarding issues and concerns.

To ensure learners with profound and multiple learning difficulties and/or communication complications can communicate their concerns or disclose if they are being abused or harmed, the College has ensured that a number of alternative methods of communication are available to learners to ensure they are able to articulate their concerns. These include emotion cards, the Makaton system and the use of iPads. Safeguarding learning opportunities within the curriculum will be appropriately differentiated to ensure all young people can access it.

## **22. Use of Reasonable Force**

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The College will endeavour where at all possible to avoid the use of force with learners by the careful and consistent management of their behaviour through the continual reiteration and promotion of the behaviour standards.

However, the College recognises that very rare circumstances will arise when staff at the College will be obliged to use reasonable force to prevent learners committing a crime; causing injury or damage; or causing disruption. In these instances, staff will follow the Use of Reasonable Force Policy and under no circumstances does the College authorise the use of corporal punishment nor condone the use of inappropriate force.

The College will seek at all times to promote a shared sense of community and belonging amongst learners. It recognises that staff will always work to prevent situations where restraint is used and will only reluctantly resort to physical interventions if their best professional judgement deems this to be necessary.

## **23. Photography and Images**

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To protect learners, the College will:

- seek their consent for photographs to be taken or published (for example, on the College website or in newspapers or publications);
- seek parental consent where necessary;
- use only the learner's first name with an image;
- ensure learners are appropriately dressed; and
- encourage them to tell us if they are worried about any photographs that are taken of them.

Furthermore, when using images for publicity purposes (e.g. on our website or in newspapers or publications), we will:

- avoid naming young people when possible;
- if it is necessary to name a young person, use first names rather than surnames;

- if young people are named, avoid using their image;
- establish whether the image will be retained for further use, where and for how long;
- ensure that images are stored securely and used only by those authorised to do so.

For the protection of pupils and staff, only College owned equipment will be used to record and store images taken by staff or volunteers on the College site or during offsite activities including residential visits.

## **24. Attendance**

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The College recognises that full attendance at College is important to the well-being of all learners and enables them to access the opportunities made available to them at College. Attendance is monitored closely and the College works in partnership with the Local Authority when patterns of absence give rise to concern.

## **25. Young People Missing from Education**

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The College operates in accordance with statutory guidance 'Children Missing Education (DfE 2016)' - All young people, regardless of their circumstances, are entitled to an efficient, full time education which is suitable to their age, ability, aptitude and any special educational needs they may have.

Young people missing education are at significant risk of underachieving, being victims of harm, exploitation or radicalisation, and becoming NEET (not in education, employment or training) later in life. Effective information sharing between parents, College and local authorities is critical to ensuring that all learners of compulsory school age are safe and receiving suitable education.

Attendance, absence and exclusions are closely monitored. All teaching and ILS staff are aware about the procedure for reporting and acting when young people do not arrive for College and/or do not attend regularly.

Attendance, absence and exclusions are closely monitored. The DSL will monitor unauthorised absence and take appropriate action, particularly where young people go missing on repeated occasions and/or are missing for periods during the College day.

## **26. Young People Who Are Young People in Care, Were Previously a Young Person in Care.**

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The most common reason for young people becoming a young person in care is as a result of abuse or neglect. The College ensures that staff have the necessary skills and understanding to learners safe and ensures that appropriate staff have information about a young person's in care status and care arrangements, including the level of authority delegated to the carer by the authority looking after them.

Local authorities have ongoing responsibilities to young people who were previously a young person in care. That includes keeping in touch with them, preparing an assessment of their needs and appointing a Personal

Advisor who develops a pathway plan with the young person. This plan describes how the local authority will support them to participate in education or training.

## **27. Young People Who Go Missing from Home or Care**

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The College recognises that young people who run away or go missing - and are thus absent from their normal residence - are potentially vulnerable to abuse, exploitation, offending and placing themselves in situations where they may suffer physical harm.

*'Keeping Children Safe in Education DfE 2022'* highlights that *'Statutory Guidance on Children Who Run Away or go Missing from Home or Care' (DfE 2014)* requires that every child or young person who runs away or goes missing must be offered a Return Home Interview (RHI) within a period of 72 hours of their return.

When necessary and in conjunction with the Local Authority, the College will facilitate Return Home Interviews, both in terms of releasing the young person from their normal timetable to participate in an interview and in providing an appropriate and safe space on the College site for the interview to take place.

The College will check with the Local Authority whether or not parents/carers have given their consent to the interview. However, young people aged 16 and 17 years old are generally considered to be able to consent and withhold consent to their own information being shared and therefore to participate in a RHI or not.

If the Local Authority has not received consent from parents/carers and the young person is not assessed as being capable of giving or withholding informed consent, the College will contact the parent/carer and seek to secure their consent.

Parents/carers may also choose to accompany their son/daughter in interviews and the College will facilitate that as appropriate.

## **28. Helping Learners to Keep Themselves Safe – Promoting safeguarding and Welfare in the Curriculum**

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*'Keeping Children Safe in Education DfE 2022'* requires governing bodies and proprietors to ensure that young people are taught about safeguarding, including online, through teaching and learning opportunities, as part of providing a 'broad and balanced curriculum.' The College recognises the importance of teaching young people how to stay safe and look after their mental health and is committed to equipping young people with the skills and knowledge to have successful and happy lives.

Learners are taught to understand and manage risk through the personal social and behaviour tutorial programme and through all aspects of College life. The College approach is designed to help learners to think about risks they may encounter and with the support of staff work out how those risks might be reduced or managed.

Discussions about risk are empowering and enabling for all learners and promote sensible behaviour rather than fear or anxiety. Learners are taught how to conduct themselves and how to behave in a responsible manner. Learners are also reminded regularly about digital safety, the risks of sharing content and images

online and tackling bullying, including cyber bullying procedures. The College continually promotes an ethos of respect for learners and they are encouraged to speak to a member of staff of their choosing about any worries they may have. The College will cover relevant issues in line with government guidance on Relationship Education and Sex Education and Health Education.

## 28.1 Digital Safety

The College's digital safety & security policy explains how the College tries to keep learners safe in College and protect and educate them in the safe use of technology. Some adults and young people will use technology to harm through criminal and sexual exploitation; county lines activity; radicalisation; sexual predation and cyber bullying. The use of technology has become a significant component of many safeguarding issues.

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

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

Cyberbullying and sexting by learners will be treated as seriously as any other type of bullying and will be managed through the College Learner Behaviour policy. Serious incidents may be managed in line with the College Young People and Adults at Risk Policy and procedures.

The College recognises that learners may use mobile technology that can access the internet through 3G and 4G connections, which bypass the college network and firewall settings.

All staff receive online safety training and the College's digital safety co-ordinator is: Simon Shackleton (ex 6117).

## 28.2 Safeguarding young people in online learning and communication between staff and learners

Where staff are delivering lessons online or virtually, all such lessons will be delivered in accordance with the Colleges safeguarding and child protection, staff behaviour (code of conduct) and acceptable use of ICT policies. This will ensure that the Colleges filtering and monitoring software is enabled.

Staff will always use College owned devices and accounts for the delivery of online/virtual lessons/tutorials. Where possible, applications that facilitate the recording of lessons will be used subject to data protection and retention/storage guidelines.

It is important that all staff who interact with young people online continue to look out for signs that a young person may be at risk, distressed for some reason or vulnerable in some other way; and report and record any concerns to the DSL in the normal way. The DSL will respond to any such concern as they would any other safeguarding concern.

The College will ensure that online learning tools and systems are used in line with privacy and data protection/GDPR requirements.

Staff members delivering lessons or communicating with young people online/virtually will raise any issues in respect of inappropriate dress, setting, behaviour etc with the young person and/or parent immediately and will end the online interaction if necessary. Any such incident will be recorded and reported to the DSL.

Below are issues that staff need to take into account when delivering online/virtual lessons or communicating with young people online, particularly where webcams are used:

- Staff and young people must be fully dressed and wear suitable clothing, as should anyone else in the household.
- Any computers used should be in appropriate areas, for example not in bedrooms; and the background should be blurred. If it is not possible to blur the background, staff must consider what young people can see in the background and whether it would be appropriate in a classroom. This includes photographs, artwork, identifying features, mirrors etc.
- Staff will ensure that resources and videos used are age appropriate – the young person may not have support immediately to hand at home if they feel distressed or anxious about content.
- Live classes should be recorded so that if any issues were to arise, the video can be reviewed.
- Live classes will be kept to a reasonable length of time so that children do not have too much screen time and in order to minimise disruption for the family.
- Language must be professional and appropriate, including that used by any family members in the background.
- Staff must only use platforms specified by senior managers and approved by College's ICT manager/co-ordinator for communication with students.
- Staff should record the length, time, date and attendance of any sessions held.

If a staff member believes that a young person or parent is recording a lesson or conversation without prior consent, the lesson will be ended or the young person will be logged out immediately.

In **rare and exceptional circumstances** where staff urgently need to contact a young person or parent by telephone and do not have access to a College-owned device, they will discuss this with a senior member of staff. If it is agreed there is no alternative to using a personally owned device, staff members will always use 'caller withheld' to ensure the young person and/or parent is not able to identify the staff member's personal contact details.

### **28.3 Bullying, child on child abuse and harmful sexual violence/harassment and behaviour**

Young people can abuse other young people. This is generally referred to as child on child abuse and can take many forms. It is most likely to include, but not limited to:

- bullying (including cyberbullying);
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm;



- sexual violence, such as rape, assault by penetration and sexual assault;
- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be stand-alone or part of a broader pattern of abuse;
- sexting including pressuring another person to send a sexual image or video content (also known as youth produced sexual imagery);
- upskirting, which typically involves taking a picture under a person's clothing (not necessarily a skirt) without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm (upskirting is a criminal offence and may constitute sexual harassment). Anyone of any gender can be a victim;
- teenage relationship abuse - defined as a pattern of actual or threatened acts of physical, sexual or emotional abuse, perpetrated against a current or former partner;
- initiation/hazing - used to induct newcomers into an organisation such as sports team or school groups by subjecting them to a series of potentially humiliating, embarrassing or abusing trials which promote a bond between them; and
- prejudiced behaviour - a range of behaviours which causes someone to feel powerless, worthless or excluded and which relates to prejudices around belonging, identity and equality, in particular prejudices linked to disabilities, special educational needs, ethnic, cultural and religious backgrounds, gender and sexual identity.

Sexual violence and sexual harassment can occur between two young people of any age and sex. It can also occur through a group of young people sexually assaulting or sexually harassing a single young person or group of young people. Young people who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and offline (both physical and verbal) and are never acceptable. It is important that all victims are taken seriously and offered appropriate support. Staff should be aware that some groups are potentially more at risk.

Sexual harassment in the context of child on child behaviour is unwanted conduct of a sexual nature that can occur online and offline. Sexual harassment is likely to: violate a young person's dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment.

Online sexual harassment may happen on its own or as part of a wider pattern of sexual harassment and/or sexual violence.

Sexual harassment creates an atmosphere that, if not challenged, can normalise inappropriate behaviours and provide an environment that may lead to sexual violence. The school/college therefore recognises the importance of recognising the nature of, identifying and challenging sexual violence and sexual harassment in its wider approach to safeguarding and promoting the welfare of children; through policies and through the curriculum.

"Upskirting" typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm. Although this harassment is known as "upskirting", people of any gender can be victims. Photos can be taken under any item of clothing including shorts and trousers.

All incidences of bullying, including cyber-bullying and prejudice-based bullying should be reported and will be managed through the College anti-bullying procedures. Members of staff who become concerned about a learner's sexualised behaviour, including any known online sexualised behaviour, should record their concerns on CPOMS and report them to the DSL as soon as possible, as with any other safeguarding concern.

When referring to sexual violence, this policy uses the definitions of sexual offences in the Sexual Offences Act 2003 as follows:

**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.

**What is consent?** Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another, e.g. to vaginal but not anal sex or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity and each time activity occurs. Someone consents to vaginal, anal or oral penetration only if s/he agrees by choice to that penetration and has the freedom and capacity to make that choice.

- a child under the age of 13 can never consent to any sexual activity;
- the age of consent is 16;
- sexual intercourse without consent is rape.

**Sexual harassment** in the context of child-on-child behaviour is unwanted conduct of a sexual nature that can occur online and offline. 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.

Online sexual harassment may happen on its own or as part of a wider pattern of sexual harassment and/or sexual violence.

All responses to reports of sexual violence will be subject to an immediate risk and needs assessment undertaken by the DSL (or a deputy), using her/his professional judgement and supported by other agencies, such as children's social care and the Police. The need for a risk and needs assessment in relation to reports of sexual harassment will be considered on a case-by-case basis.

It is essential that **all** victims are reassured that they are being taken seriously, regardless of how long it has taken them to come forward, and that they will be supported and kept safe. Abuse that occurs online or outside of the College should not be downplayed and should be treated equally seriously. A victim **should** never be given the impression that they are creating a problem by reporting sexual violence or sexual

harassment. Nor **should** a victim ever be made to feel ashamed for making a report. **It is important to explain that the law is in place to protect children and young people rather than criminalise them**, and this should be explained in such a way that avoids alarming or distressing them.

The risk and needs assessment will consider:

- the victim, especially their protection and support;
- the alleged perpetrator/s (if she/he/they attend the same College);
- all the other young people and staff at the College, especially any actions that are appropriate to protect them.

The management of young people with sexually harmful behaviour is complex and the College will work with other relevant agencies to maintain the safety of the whole College community. Young people who display such behaviour may be victims of abuse themselves and the safeguarding procedures will be followed for both victim and perpetrator.

Any instances of sexual harm caused by one learner to another and any situation where there are concerns about power imbalance, coercion or force will be discussed with Children's or Adult Social Care.

In responding to cases involving young people or adults at risk, who have committed sexually abusive behaviours, Social Care will consult with the appropriate agencies for advice, consultation or provision of a direct service.

The College is committed to participating in plans both to provide learners who are at risk from other learners and those who may present a risk to other learners with appropriate services to address any concerns and, wherever possible, to facilitate ongoing access to education in College for all learners concerned, subject to appropriate risk assessments and risk management plans.

### **Young people sharing a classroom – initial considerations following a report of sexual violence**

Any report of sexual violence is likely to be traumatic for the victim. However, reports of rape and assault by penetration are likely to be especially difficult for the victim and close proximity with the alleged perpetrator(s) is/are likely to be especially distressing. Whilst the College establishes the facts of the case and starts the process of liaising with Children's Social Care and the Police, the alleged perpetrator(s) will usually be removed from any classes they share with the victim. Consideration will also be given to how best to keep the victim and alleged perpetrator(s) a reasonable distance apart on College premises and on transport to and from the College where appropriate. These actions are in the best interests of both young people and should not be perceived to be a judgment on the guilt of the alleged perpetrator(s).

For other reports of sexual violence and sexual harassment, the proximity of the victim and alleged perpetrator(s) and considerations regarding shared classes, sharing College premises and transport, will be considered immediately.

In all cases, the initial report **should** be carefully evaluated, reflecting the consideration set out at paragraph 464 KCSIE, the wishes of the victim, the nature of the allegations and the protection of all young people in the College will be especially important when considering any immediate actions.

Consideration also needs to be given to the fact that the alleged perpetrator may also be a victim of exploitation and may be in a position of coercion and control.

## 28.4 Youth produced sexual imagery ('Sexting')

All incidents of youth produced sexual imagery (YPSI) will be dealt with as a safeguarding concern and recorded on CPOMS. The primary concern at all times will be the welfare and protection of the young people involved.

All incidents of YPSI should be reported to the DSL as with all other safeguarding issues and concerns. The DSL will discuss the concerns with appropriate staff and speak to young people involved as appropriate. Parents/carers will be informed if appropriate and involved in the process unless there is good reason to believe that involving parents would put the young person at risk of harm. If, at any point in the process, there is concern that a young person has been harmed or is at risk of harm a referral will be made to Social Care and/or the Police via the MASH immediately.

The Police will always be informed when there is reason to believe that indecent images involve sexual acts and any child in the imagery is under 13 years of age.

Viewing the imagery - adults should **not** view youth produced sexual imagery unless there is good and clear reason to do so. Wherever possible, the DSL's or Deputy DSL's responses to incidents will be based on what they have been told about the content of the imagery. Any decision to view imagery will be based on the DSL's or Deputy DSL's professional judgement. Imagery will never be viewed if the act of viewing will cause significant distress or harm to a learner.

If it is necessary to view the imagery then the DSL or Deputy DSL will:

- never copy, print or share the imagery; this is illegal.
- the Deputy DSL will discuss the decision to view the imagery with the DSL and where deemed appropriate contact Children's Social Care.
- ensure viewing takes place with another member of staff present in the room, ideally another Deputy DSL or a member of the senior leadership team. The other staff member does not need to view the images.
- wherever possible ensure viewing takes place on College premises, ideally in the DSL's office.
- ensure wherever possible that images are viewed by a staff member of the same sex as the young person in the imagery.
- record the viewing of the imagery on CPOMS, including who was present, why the image was viewed and any subsequent actions; and ensure this is signed and dated and meets the wider standards set out by Ofsted for recording safeguarding incidents.

Deletion of images - if the College has decided that other agencies do not need to be involved, then consideration will be given to deleting imagery from devices and online services to avoid any further sharing of the imagery.

## **28.5 Searching, Screening and Confiscation**

Where necessary, searching, screening and confiscation will be used to safeguard young people in College. The College adheres to 'Searching, Screening and Confiscation: Advice for Schools' (January 2018) and with due regard for the requirement for young people to have an Appropriate Adult. Please refer to the Weapons Policy.

## **28.6 Mental Health**

The College recognises that safeguarding and promoting the welfare of young people includes preventing the impairment of young people's mental health or development.

All staff will be aware that mental health problems may be an indicator that a young person is suffering or is at risk of suffering abuse, neglect or exploitation.

Staff will not attempt to make a diagnosis of a mental health problem unless they are appropriately trained. We recognise that staff are well-placed to observe behaviour that may indicate that a young person is experiencing a mental health problem, or is at risk of developing one. There are clear systems and processes in place for identifying possible mental health problems. If staff are concerned that a young person is suffering a mental health problem, they should raise it as a concern on CPOMS and talk to the safeguarding team. If staff are concerned that a young person is experiencing a mental health problem that is also a safeguarding concern, they must report this to the Designated Safeguarding Lead (or deputy Designated Safeguarding Lead) immediately.

The College has a team of Mental Health First Aiders (MHFA) and a clinical multi-disciplinary team who can support learners exhibiting mental health concerns.

## **28.7 Honour-Based Abuse HBA**

So-called 'honour-based' abuse (HBA) encompasses crimes which have been committed to protect or defend the honour of a family and/or community. Such crimes include forced marriage, and practices such as breast ironing. Staff will be alert to the possibility of a learner being at risk of HBV or already having suffered HBA.

All forms of so called HBA are abuse (regardless of the motivation) and staff will record and report any concerns about a learner who might be at risk of HBA to the Designated Safeguarding Lead as with any other safeguarding concern. The DSL will consider the need to make a referral to the Police, and/or Social Care as with any other safeguarding concern; and may also contact the Forced Marriage Unit for advice as necessary on 020 7008 0151 or via email at [fmufco.gov.uk](mailto:fmufco.gov.uk) for advice as necessary.

## **28.8 Female Genital Mutilation (FGM) A form of so-called honour-based abuse**

Female genital mutilation is a form of abuse. It is the collective name given to a range of procedures involving the partial or total removal of the external female genitalia for non-medical reasons or other injury to the female genital organs. It has no health benefits and harms girls and women in many ways.

The practice, which is most commonly carried out without anaesthetic, can cause intense pain and distress with long-lasting harmful consequences, including difficulties in childbirth.

FGM is carried out on girls of any age, from young babies to older teenagers and adult women. College staff are trained to be aware of risk indicators. Staff will be particularly alert to suspicions or concerns expressed by female learners about going on a long holiday during the summer vacation period.

Indicator that FGM may have already taken place may include,

- having difficulty or looking uncomfortable when walking, sitting or standing;
- spending longer than normal in the bathroom or toilet due to difficulties urinating;
- spending long periods of time away from a classroom during the day with bladder or menstrual problems;
- having frequent urinary, menstrual or stomach problems;
- having prolonged or repeated absences from College, especially with noticeable behaviour changes (e.g. withdrawal or depression) on the girl's return;
- being reluctant to undergo normal medical examinations;
- confiding in a member of staff without being explicit about the problem due to embarrassment or fear;
- talking about pain or discomfort between her legs.

In England, Wales and Northern Ireland, the practice is illegal under the Female Genital Mutilation Act 2003.

If staff have a concern that a learner may be at risk of FGM, they will record their concern and inform the DSL as they would any other safeguarding concern.

Teachers are subject to a statutory duty defined by Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) to report to the Police personally where they discover (e.g. by means of a disclosure) that an act of FGM appears to have been carried out on a learner who is aged under 18. This is known as mandatory reporting. Teachers in that situation will record their concerns and inform the DSL, who will support the teacher in making a direct report to the Police.

## **28.9 Forced Marriage A form of so-called honour-based abuse**

A forced marriage is a marriage in which a female (and sometimes a male) does not consent to the marriage but is coerced into it. Coercion may include physical, psychological, financial, sexual and emotional pressure. It may also involve physical or sexual violence and abuse.

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

Children may be married at a very young age, and well below the age of consent in England. College staff should be particularly alert to suspicions or concerns raised by a learner about being taken abroad and not being allowed to return to England.

Since June 2014 forcing someone to marry has become a criminal offence in England and Wales under the Anti-Social Behaviour, Crime and Policing Act 2014. From February 2023, the legal age of marriage in England and Wales raised to 18. It is now illegal and a criminal offence to exploit vulnerable children by arranging for them to marry, under any circumstances whether or not force is used.

## 29. Extra-Familial Harm

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The College recognises that safeguarding incidents can be associated with factors outside the College. We also recognise that safeguarding incidents or behaviours can occur between young people outside of College. We would always consider contextual safeguarding factors when responding to safeguarding incidents.

All staff will be made aware that safeguarding incidents and/or behaviours can be associated with factors outside the College and/or can occur between young people outside these environments.

## 30. Protecting Young People from Radicalisation and Extremism (Prevent)

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All Colleges are subject to a duty under section 26 of the Counter-Terrorism and Security Act 2015 (the CTSA 2015), in the exercise of their functions, to have 'due regard to the need to prevent people from being drawn into terrorism'. This duty is known as the **Prevent duty**.

Protecting young people from the risk of radicalisation is part of the College's wider safeguarding duties and is similar in nature to protecting young people from other forms of harm and abuse. Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups. Extremism is the vocal or active opposition to fundamental values, including the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces. Even very young children have been exposed, in rare circumstances, to extremism at home and elsewhere including online.

During the process of radicalisation, it is possible to intervene to prevent vulnerable people being radicalised. The College is committed to preventing learners from being radicalised and drawn into any form of extremism or terrorism. The College promotes the values of democracy, the rule of law, individual liberty, mutual respect and tolerance of those with different faiths and beliefs by providing learners with opportunities through the curriculum to discuss issues of religion, ethnicity and culture and learn how to discuss and debate points of view; and by ensuring that all learners are valued and listened to within College.

Staff receive training that provides them with both the information they need to understand the risks affecting young people in the Coventry area; and a specific understanding of how to identify individual learners who may be at risk of radicalisation and how to support them. Staff are trained to report all concerns about possible radicalisation and extremism to the DSL immediately as they would any other safeguarding concern.

The College recognises the importance of providing a safe space for learners to discuss controversial issues; and building their resilience and the critical thinking skills they need in order to challenge extremist perspectives. However, the College will make appropriate referrals to the Police PREVENT team in respect

of any learner whose behaviour or comments suggest that they are vulnerable to being radicalised and drawn into extremism and terrorism in order to ensure that they receive appropriate support.

The College expects all staff, volunteers, governors, visiting professionals, contractors and individuals or agencies that hire College premises to behave in accordance with the College's Staff Behaviour Policy (Code of Conduct), will challenge the expression and/or promotion of extremist views and ideas by any adult on College premises or at events and, when necessary, will make appropriate referrals in respect of any such adult.

If staff need to make a direct referral contact Prevent on [CTU\\_GATEWAY@west-midlands.pnn.police.uk](mailto:CTU_GATEWAY@west-midlands.pnn.police.uk)

### **31. Young people who are Lesbian, gay bi, or trans (LGBT)**

The fact that a young person may be LGBT is not in itself an inherent risk factor for harm. However, young people who are LGBT can be targeted by other young people.

Risks can be compounded where young people who are LGBT lack a trusted adult with whom they can be open. It is therefore vital that staff endeavour to reduce the additional barriers faced and provide a safe space for them to speak out or share their concerns with members of staff.

### **32. Homelessness**

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Being homeless or being at risk of becoming homeless presents a real risk to a young person's welfare. The DSL (and any deputies) refer any concerns 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, this does not, and should not, replace a referral into Children's or Adult Social Care where a young person has been harmed or is at risk of harm.

In most cases College staff will be considering homelessness in the context of young people who live with their families, and intervention will be on that basis. However, it should also be recognised that 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 DSL (or a deputy) will ensure appropriate referrals are made based on the young person's circumstances.

### **33. Private Fostering Arrangements**

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A private fostering arrangement occurs when someone other than a parent or a close relative cares for a young person for a period of 28 days or more, with the agreement of the young person's parents. It applies to young people under the age of 16, or under 18 if the young person is disabled. Young people looked after by the Local Authority or who are placed in a residential school, children's home or hospital are not considered to be privately fostered.



By law, a parent, private foster carer or other persons involved in making a private fostering arrangement must notify Children's Social Care as soon as possible. When the College becomes aware of a private fostering arrangement for a learner that has not been notified to Children's Social Care, the College will encourage parents and private foster carers to notify Children's Social Care and will share information with Children's Social Care as appropriate.

### **34. Young People who need a social worker**

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The College recognised that some young people need a social worker due to abuse, neglect or family circumstances and that abuse and trauma can leave young people vulnerable to further harm as well as educational disadvantage.

The Designated Safeguarding Lead will hold information relating to social worker working with young people in the College. This information will inform decisions about safeguarding and promoting welfare.

### **35. Young People and the Court System**

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Young people are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. The College will access guidance highlighted in 'Keeping Children Safe in Education' DfE 2022, which explains each step of the process and support and special measures that are available. There are diagrams illustrating the courtroom structure and the use of video links is explained.

### **36. Young People with Family Members in Prison**

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Approximately 200,000 young people in England and Wales have a parent who is sent to prison each year. These young people are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. The College will seek to support learners in this position through pastoral care, early help and discussions with parents/carers and other family members as appropriate.

### **37. Related Safeguarding Portfolio Policies**

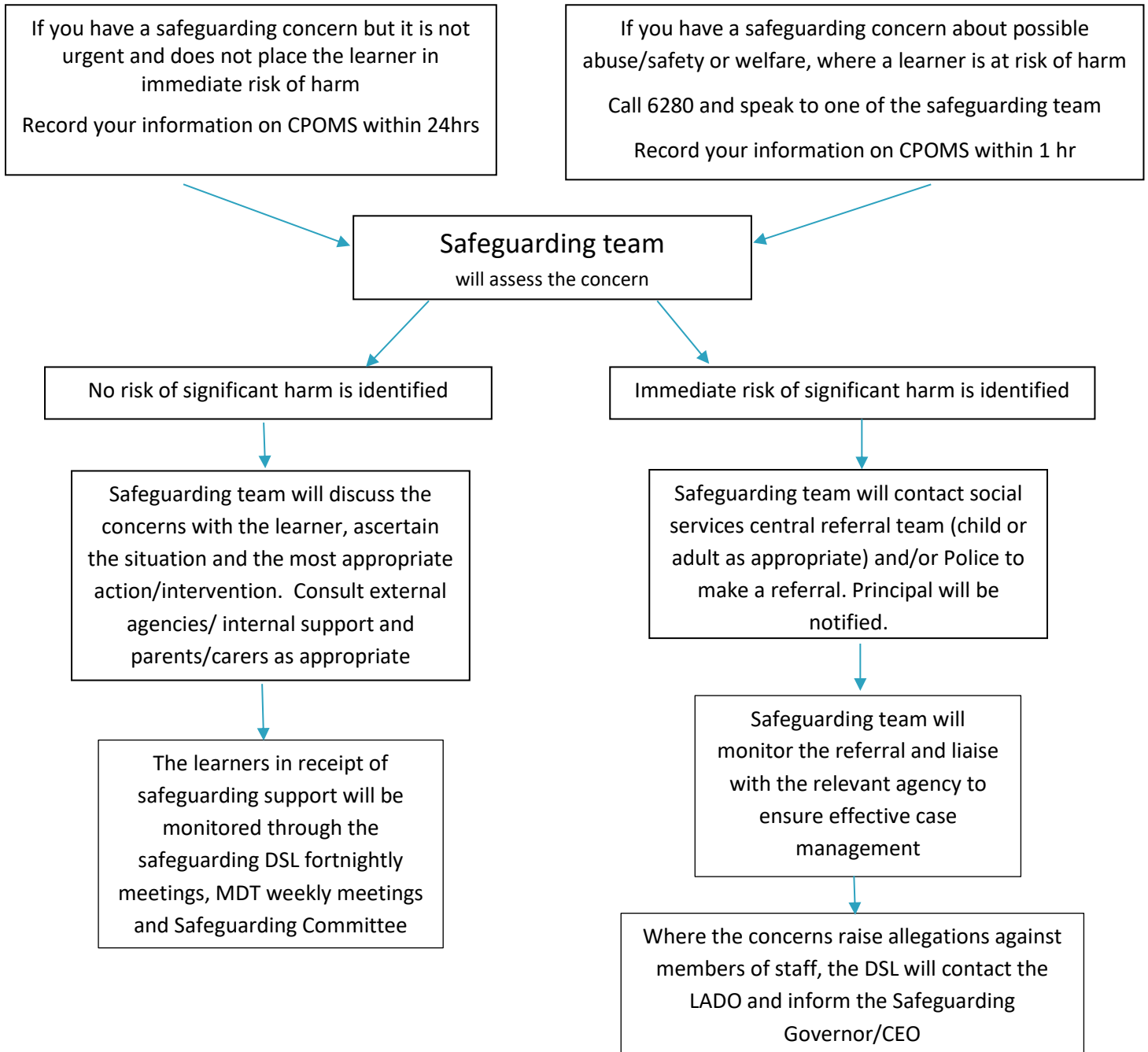
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- Staff Code of Conduct
- Complaints Procedure
- Anti-Bullying Policy (Learner)
- Whistleblowing Policy
- Safer Recruitment Policy
- Disciplinary Policy and Procedure
- Grievance Policy and Procedure
- Behaviour Management and Disciplinary Policy (learners)
- Absence Procedure
- Use of Reasonable Force
- Digital Safety and Security Policy
- Vetting of External Speakers Policy

- Learner Mental Health and Wellbeing Policy
- Weapons Policy
- Prevent Strategy and Action Plan

## Appendix 1 - Hereward College Safeguarding Procedure

### Safeguarding Procedure Recognition, Response, Record, Report and Refer



Jane Ferguson, Vice Principal Safeguarding & Pastoral Care (x 6130) DSL  
Emma Barker Safeguarding & Risk Manager (x 6161) Deputy DSL  
Tess Murray & Nikki Schoolar, Safeguarding Coordinators (x 6280) Deputy DSL  
Care Managers Deputy DSL (x 6148)  
Maxine Darcy/Justine Hamilton  
Simon Shackleton, Technical Estates & Facilities Manager (x 6117) Digital Safety  
Dave Ackerman, Lead Progress Coach (x 6123) LAC lead

## Equality, Diversity and Inclusion Impact Assessment

|   |  |
|---|--|
| <b>Name of policy</b>                                   | Young People and Adults at Risk Safeguarding Policy  |
| <b>Author of impact assessment (name and job title)</b> | Jane Ferguson<br>Vice Principal – Safeguarding and Pastoral Care   |
| <b>Date impact assessment completed</b>                 | September 2022   |
| <b>Is this a new or reviewed policy?</b>                | New policy <input type="checkbox"/><br>Date policy written<br>Reviewed policy <input checked="" type="checkbox"/><br>Date of review September 2022 |

|  |   |
|--|---|
| <b>Briefly describe the aims and purpose of the policy</b>   | To ensure all staff are clear of their statutory duties to safeguard. |
| <b>Who is intended to benefit from this policy and in what way?</b>  | All staff and learners.   |
| <b>What could contribute or detract from achieving the aims and purpose of the policy?</b>   | Staff not undertaking safeguarding duties effectively.                |
| <b>What evidence or data has been collected and used to determine the impact on equality groups. Have any data gaps been identified.</b> | No  |

|  |  | Comments / Evidence |
|--|--|---------------------|
| <b>Has consultation on this policy indicated any possible concerns or issues in relation to equality, diversity and inclusion?</b> | Yes <input type="checkbox"/><br>No <input checked="" type="checkbox"/> |                     |
| <b>Is there an opportunity to promote equality of opportunity by this policy?</b>  | Yes <input checked="" type="checkbox"/><br>No <input type="checkbox"/> |                     |

**Potential impact on grounds of:**

|  |   |  |
|--|---|--|
| <b>Race</b>                            | Positive <input type="checkbox"/><br>Negative <input type="checkbox"/><br>No impact <input checked="" type="checkbox"/> |  |
| <b>Disability</b>                      | Positive <input type="checkbox"/><br>Negative <input type="checkbox"/><br>No impact <input checked="" type="checkbox"/> |  |
| <b>Gender</b>                          | Positive <input type="checkbox"/><br>Negative <input type="checkbox"/><br>No impact <input checked="" type="checkbox"/> |  |
| <b>Gender reassignment/identity</b>    | Positive <input type="checkbox"/><br>Negative <input type="checkbox"/><br>No impact <input checked="" type="checkbox"/> |  |
| <b>Age</b>                             | Positive <input type="checkbox"/><br>Negative <input type="checkbox"/><br>No impact <input checked="" type="checkbox"/> |  |
| <b>Sexual orientation</b>              | Positive <input type="checkbox"/><br>Negative <input type="checkbox"/><br>No impact <input checked="" type="checkbox"/> |  |
| <b>Religion or belief</b>              | Positive <input type="checkbox"/><br>Negative <input type="checkbox"/><br>No impact <input checked="" type="checkbox"/> |  |
| <b>Marriage and civil partnerships</b> | Positive <input type="checkbox"/><br>Negative <input type="checkbox"/><br>No impact <input checked="" type="checkbox"/> |  |
| <b>Pregnancy and maternity</b>         | Positive <input type="checkbox"/><br>Negative <input type="checkbox"/><br>No impact <input checked="" type="checkbox"/> |  |

**If any potential negative impacts of this policy have been identified then a full equality impact assessment form should be completed.**