

SAFEGUARDING CHILDREN AND ADULTS AT RISK POLICY 2022-23

Contents	Page
1. Introduction	2
2. Purpose	3
3. Scope	3
4. Main Elements	4
5. Group Roles and Responsibilities	7
6. Whistleblowing	13
7. Review	13
8. Access to Policy	14
9. STCG Safeguarding Reporting Flow Chart	15
10. STCG Safeguarding Structure	16
Appendix 1: Part One: Safeguarding information for all staff	22
Appendix 2: Annex A - Further information about specific forms of abuse and safeguarding issues	36
Appendix 3: Annex C - Role of the designated safeguard lead	51
Appendix 4: Child-on-child Abuse Procedures	

1. Introduction

- 1.1. South Thames Colleges Group is committed to a whole Group approach to safeguarding and promoting the welfare of children and adults at risk. The Group will ensure that action is taken to support all those at risk of significant harm. Safeguarding and promoting the welfare of children and adults at risk is **everyone's** responsibility. The Group requires that all staff, governors, volunteers and those contracted to provide services should consider at all times what is in the best interests of the child (or adult at risk).
- 1.2 The Group recognises that 'Good safeguarding requires a continuing commitment from governing bodies, proprietors, and all staff to ensure the safety and welfare of children is embedded in all of the organisation's processes and procedures, and consequentially enshrined in its ethos.' (Keeping Children Safe in Education 2022).
- 1.3 The Group requires all staff to demonstrate high standards in their management of risk and in the active protection of children and adults at risk from discrimination and avoidable harm. **All** staff should maintain the attitude "it could happen here".
- 1.4 Staff are required to understand and fulfil their duties to children (young people under 18) and adults at risk in accordance with all relevant legislation, statutory guidance and departmental advice including:
- Children Acts 1989 and 2004
 - Children and Social Work Act 2017
 - Section 5B of the FGM Act 2003 as inserted by section 74 of the Serious Crime Act 2015
 - Sexual Offences Act 2003
 - Counter Terrorism and Security Act 2015
 - Vulnerable Groups Act 2006
 - Care Act 2014
 - Equality Act 2010
 - Human Rights Act 1998
 - Keeping Children Safe in Education September 2022
 - Working Together to Safeguard Children 2018
 - The Prevent Duty for Further Education updated 2021
 - What to do if you are Worried a Child is Being Abused
 - Information Sharing: advice for practitioners providing safeguarding services' DfE July 2018
- 1.5 The Group recognises that the welfare of the student is paramount and that, in accordance with the Equality Act 2010, all students regardless of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, and sexual orientation have the right to protection from all types of harm or abuse. Working in partnership with children, adults at risk, their parents, carers and other agencies is essential in promoting the welfare of individuals.
- 1.6 This policy should be read in conjunction with individual College's safeguarding procedures and relevant policies – notably:
- E-Safety Policy
 - Freedom of Speech & Visiting Speaker Policy
 - Inclusion and Learning Support Policy
 - Children Looked After and Care Leavers Policy

- Criminal Conviction Disclosure Policy
- Student Code of Conduct
- Student Disciplinary Policy and Procedure
- Child-on-child abuse Procedures (see Appendix 3)
- Policy for Low Level Safeguarding Concerns
- Procedure for Dealing with (staff) Allegations
- Safer Recruitment of Staff
- Safeguarding and External Contractor’s Procedures.
- Whistleblowing Policy

2 Purpose

- 2.1 The purpose of this policy is to provide a framework that informs procedures relating to the Groups legal obligations to safeguard and protect children (and adults at risk) who are at risk of harm, have been suffering forms of abuse or are at risk of radicalisation.
- 2.2 This policy provides clear direction to all members of the college community to ensure child protection and adult at risk concerns, referrals and monitoring of actions are handled sensitively, professionally and in ways that promote the welfare of students and support their needs e.g., students are encouraged to talk and are listened to. The policy also makes a commitment to the development of good practice and sound procedures.
- 2.3 All staff receive a copy of this policy and are required to read and record that it has been understood, be familiar with the statutory guidance ‘Keeping Children Safe in Education’ 2022 Part One/Annex B and undertake regular refresher training so that they are able to fulfil their safeguarding duties.
- 2.4 The Group’s policy and procedures for safeguarding mirror Local Safeguarding Children partnerships and are based upon the London Safeguarding Children Procedures and Practice Guidance (<https://www.londoncpc.co.uk>) and the London Multi Agency Adult Protection Policy and Procedures (<https://londonadass.org.uk/safeguarding/review-of-the-pan-london-policy-and-procedures>).

3 Scope

- 3.1 The policy applies to all students, governors, staff and volunteers working for the Group in all locations where education and training is delivered to children and adults at risk. It applies also to those situations where students are in a workplace setting undertaking vocational training or studying for vocational qualifications. The policy also covers collaborative provision and staff employed directly by contractors supplying services on behalf of the Group. Subcontractors of educational provision are required to have and adhere to their own safeguarding policies and procedures which are in line with relevant legislation and statutory guidance; these will be quality assured by the Group.
- 3.2 Safeguarding and promoting the welfare of children is defined in KCSIE 2022 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
 - taking action to enable all children to have the best outcomes

Policy Title – Safeguarding Children and Adults at Risk Policy	Staff Member Responsible: Vice Principal – Student Services
Version: Final	Review Date: July 2023

- 3.3 Within the Group safeguarding involves taking action to prevent harm and to protect students from maltreatment by physical abuse, sexual abuse, emotional abuse and neglect which may take place inside or outside of college and online. It also covers vulnerability to violent extremism from potential radicalisation. Section 26 of the Counter Terrorism and Security Act, 2015 places a duty on colleges to have “due regard to the need to prevent people from being drawn into terrorism”.
- 3.4 Safeguarding also encompasses specific issues such as student health and safety; serious violence; child-on-child abuse (including bullying sexual violence; sexual harassment; harmful sexual behaviour), arrangements to meet medical need; provision of first aid; college security; access to and use of information technology.
- 3.5 A ‘child’ is defined as a person aged up to 18. ‘Keeping Children Safe in Education’ 2022 recognises the additional vulnerabilities of ‘looked after children’ and care leavers. The Children Act 2004 also covers adults with a disability up to the age of 25.
- 3.6 An adult at risk is defined as “a person aged 18 or over who is, or may be in need of community care services by reason of mental or other disability, age or illness; and who is or may be unable to take care of him/herself, or unable to protect themselves against significant harm or exploitation” (Safeguarding Vulnerable Groups Act 2006). An ‘Adult at Risk’ may therefore be a person who:
- is elderly and frail due to ill health, physical disability or cognitive impairment has learning disability
 - has a physical disability and/or a sensory impairment
 - has mental health needs including dementia or a personality disorder
 - has a long-term illness/condition
 - misuses substances or alcohol
 - is a carer such as a family member/friend who provides personal assistance and care to adults and is subject to abuse
 - is unable to demonstrate the capacity to make a decision and is in need of care and support
- Please note this is not an exhaustive list.

4. Main Elements

The three main elements of the Policy are Prevention, Protection and Monitoring and Recording.

4.1 Prevention

The Group will put in place measures which are intended to prevent harm to children and adults at risk. The Group will:

- 4.1.1 Adopt a zero-tolerance approach to bullying, discrimination, sexual harassment and sexual violence and recognise that even if there are no reported cases, staff must not take the view that it does not happen. All staff should challenge inappropriate behaviours between students that are abusive in nature.
- 4.1.2 Provide safeguarding and child protection training (including on-line safety) as part of the Group safeguarding approach and wider staff training and curriculum planning. Ensure training is regularly updated including in-year updates to provide staff with the relevant skills and

knowledge to safeguard children and vulnerable adults effectively. Specific training will enable staff to:

- proactively engage in preventing radicalisation and extremism, as part of the Government’s “Prevent” strategy.
- proactively engage in preventing sexual abuse, harassment and harmful sexual behaviour.
- understand that technology is a significant component in many safeguarding and wellbeing issues.
- be aware of the indicators of serious violence and its associated risks regarding youth violence, gang involvement and exploitation of children through child criminal exploitation and county lines.

- 4.1.3 Ensure the Designated Safeguarding Lead and Deputy Safeguarding Leads undergo DSL training every two years and in addition to this training, their knowledge and skills will be refreshed at least annually.
- 4.1.4 Ensure the Designated Safeguarding Lead and Deputy Safeguarding Leads undertake Prevent awareness training to provide a good understanding of their own role, and the processes, procedures and responsibilities of other agencies, particularly children’s social care.
- 4.1.5 Establish and maintain a safe environment in which students feel secure and are encouraged to talk freely about anything that concerns them.
- 4.1.6 Include opportunities in the curriculum to develop and equip students with the skills needed to recognise risks and stay safe from abuse (including online).
- 4.1.7 Ensure that all adults within the College who have access to children, young people and vulnerable adults have been subject to appropriate checks using safer recruitment practices.
- 4.1.8 Maintain and review a single central record of Safer Recruitment and DBS checks and training and comply with the duty of employers to inform the DBS of any individual (paid employee, volunteer or other) who poses a threat to children or adults at risk.
- 4.1.9 Develop effective links with relevant agencies and co-operate as required with their enquiries regarding child protection/ adult at risk matters including attendance at strategy meetings, case conferences, core group meetings and other relevant child or vulnerable adult protection meetings.

4.2 Protect

The Group will take action and work in conjunction with other agencies, as appropriate, to protect children and adults at risk who may be at risk of harm or who have been harmed. This includes:

- 4.2.1. Providing early intervention and support as soon as a problem emerges at any point in the young person’s or adult at risk’s life. Work with other agencies to undertake Early Help Assessments as required.
- 4.2.2 Always acting in the best interest of the child/adult at risk and providing opportunities for students to be heard and understood in the implementation of any measures to protect them.

Policy Title – Safeguarding Children and Adults at Risk Policy	Staff Member Responsible: Vice Principal – Student Services
Version: Final	Review Date: July 2023

4.2.3 Responding immediately to concerns about and disclosures made by children and adults at risk which indicate that they may be at risk of harm or have been harmed.

If a student discloses that he or she has been abused in some way, the member of staff/volunteer should:

- listen to what is being said without displaying shock or disbelief
- accept what is being said
- allow the student to talk freely
- reassure the student, but not make promises which might not be possible to keep
- never promise a student that they will not tell anyone
- reassure him or her that what has happened is not his or her fault
- stress that it was the right thing to tell
- listen, only asking questions when necessary to clarify what is being said
- not criticise the alleged perpetrator
- explain what has to be done next and who has to be told
- make a written record
- pass the information to the relevant Safeguarding Officer /DSL or Deputy without delay (if a Safeguarding Officer /DSL or Deputy is not available, staff must inform a senior member of staff or complete a child protection referral if this disclosure indicates that the student may be at risk of immediate harm and/or have been suffered significant harm to ensure reporting to Police and/or Children's Services where necessary is not delayed)

4.2.4 Ensuring students know that they can approach their tutor or other members of staff if they are worried about anything, including issues related to sexual abuse, sexual harassment, radicalisation, extremism, domestic abuse and serious violence.

4.2.5 Ensuring all staff are able to reassure victims that they are being taken seriously and that they will be supported and kept safe.

4.2.6 Ensuring that child-on-child abuse is not tolerated and action is taken if it occurs. Further information Group's procedures in relation to child-on-child abuse is included at Appendix 4.

4.2.7 Supporting students who have been abused or may be at risk of harm, including self-harm, in accordance with any agreed child protection or Care Plans.

4.2.8 Working with other agencies in order to safeguard and promote the welfare a child or adult at risk who has been harmed or is at risk of harm.

4.2.9 Ensuring staff follow accepted health and safety practices when working with students and that, where appropriate, risk assessments are carried out.

4.2.10 Helping students who are over 18 and not defined as adults at risk if they feel they are at risk of harm through creating an environment, where they are encouraged to talk to staff who can support them to talk to the police and/or other specialist services.

4.2.11 Ensuring appropriate response to any concern or allegation about a member of staff or volunteer including any low-level concerns as set out in the Group Policy for Low Level Safeguarding Concerns and the Procedure for Dealing with Allegations.

4.3.1 Records and monitoring

The Group recognises its responsibility to keep accurate and up to date records of concerns and disclosures of abuse and the action taken to address these. The Group will ensure:

- 4.3.1 All staff are aware of the need to report and record any concerns.
- 4.3.2 All concerns, discussions and decisions made and the reasons for those decisions are recorded in writing. If in doubt about recording requirements, staff should discuss with a Safeguarding Officer /or DSL (or deputy) as appropriate.
- 4.3.3 All staff receiving a disclosure they should record it as follows:
- As soon as possible after the conversation using the relevant College Safeguarding Reporting Form
 - Ensure the date, time, place is recorded, and any noticeable non-verbal behaviour and the words used by the student
 - Use a body map to indicate the position of any injuries and a clear description of the injury
 - Record statements and observations rather than interpretations or assumptions
 - Do not destroy any original records in case they are needed by a court
 - All records need to be reported and logged on Group Safeguarding systems/files promptly. No copies should be retained by the member of staff or volunteer
 - The DSL / Deputy (Centre Lead) will ensure that all safeguarding records are managed in accordance with the requirements set out in KCSIE 2022
- 4.3.4 Safeguarding records are secure and separate from other student records.
- 4.3.5 Child Protection files are kept and transferred in line with requirements set out in KCSIE 2022.

5. Group Roles and Responsibilities

5.1 The Group will ensure the safety and welfare of children is embedded in all of the organisation's processes and procedures. Safeguarding is a fundamental responsibility of all individual staff, however the oversight and management of safeguarding within the Group is given to the Corporation, the Principal/CEO, the Senior Post-Holder with responsibility for safeguarding, the Designated Safeguarding Lead and the Deputy Designated Safeguarding Leads. They ensure that structures and staffing are in place to ensure the effective delivery of safeguarding procedures within the individual Colleges.

5.2 Responsibilities of the Corporation (Governing Body)

To fulfil its strategic responsibilities for the Group's safeguarding arrangements, as set out in KCSIE 2022, the Corporation (Governing Body) will:

- 5.2.1 Select a Governor to take leadership responsibility within the Corporation for the organisation's safeguarding arrangements.
- 5.2.2 Undertake appropriate safeguarding and child protection (including online) training at induction to equip them with the knowledge to provide strategic challenge to test and assure themselves that the Group's safeguarding arrangements are effective and support a whole college approach to safeguarding. This training will be regularly updated.

- 5.2.3 Ensure an appropriate senior member of staff, from the Group leadership team, is appointed to the role of designated safeguarding lead, that this is explicit in the role-holder’s job description and that they have the appropriate status and authority to carry out the duties of the post. They should also have additional time, funding, resources, training and support to carry out their role effectively.
- 5.2.4 Ensure there are appropriate policies and procedures in place so that action can be taken to safeguard and promote children’s welfare. This includes, but is not limited to, the Group having:
- an effective safeguarding policy (including child protection procedures) which is reviewed at least annually and approved by governors
 - a student behaviour policy
 - a staff behaviour policy/code of conduct which includes low level concerns, whistleblowing and use of social media and technology
 - appropriate safeguarding responses to children missing education
 - safer recruitment policy and procedures which are effective
- 5.2.5 Assure itself that the Group fulfils its obligations under legislation and statutory guidance (KCSIE 2022) which includes ensuring the Group:
- works with other agencies to safeguard students and shares information in line with Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR).
 - provides training to staff on safeguarding and child protection at induction (including online) and that this training is regularly updated.
 - teaches students about how to keep themselves safe, including online, and has appropriate filtering and monitoring systems in place which are reviewed to ensure they are effective
 - has procedures in place to manage concerns/allegations, against staff (including agency staff and volunteers) that might indicate they would pose a risk of harm to children.
 - remedies any identified deficiencies or weaknesses in regard to child protection arrangements

5.3 Responsibilities of the Group Principal/CEO

The CEO will:

- 5.3.1 Ensure the Group’s Policy for Safeguarding children and vulnerable adults and other related College policies and procedures (including the safer recruitment of staff and managing cases of allegations made against staff) are in place and implemented to ensure the welfare of students.
- 5.3.2 Delegate operational management responsibility and implementation of procedures to a Senior Postholder and a Designated Safeguarding Lead.
- 5.3.3 Receive immediate notification of any changes affecting the policy or procedures and ensure the policy is reviewed and amended as appropriate.
- 5.3.4 Ensure staff are familiar with this Policy and Procedure, and specifically have signed to say they have read and understood KCSE 2022 Part One, Annex B and Annex C.
- 5.3.5 Be responsible for receiving allegations against a College Principal. The allegation should initially be discussed between the ‘case manager’ and Designated Safeguarding Lead (DSL) referring to the LADO threshold as set out in the Dealing with allegations of abuse against staff procedure.

5.4 Responsibilities of the allocated Senior Post-Holder – Principal Merton and Carshalton College

The Senior Post-Holder will:

- 5.4.1 Have overall management responsibility for Safeguarding across the Group and act as line Manager for the Designated Safeguarding Lead.
- 5.4.3 Ensure the Group has appropriate up to date safeguarding policies and procedures in place to ensure the safeguarding of all children and adults at risk, and that these are reviewed at least annually.
- 5.4.4 Ensure that there are Deputy Designated Safeguarding Leads in each of the Group’s Colleges, and that safeguarding arrangements in each College are fit for purpose.

5.5 Responsibilities of the College Principal

The College Principal will:

- 5.5.1 Ensure the Group’s Policy for Safeguarding Children and Adults at Risk, KCSiE 2022 and associated College procedures are implemented in their College.
- 5.5.2 Work with DSL and Deputy DSL (Centre Lead) to promote the educational outcomes and welfare of children who are experiencing welfare, safeguarding and child protection issues to help maximise their academic attendance, engagement and achievement.
- 5.5.3 Ensure staff are able to access and undertake safeguarding training and understand and fulfil their safeguarding roles and responsibilities.
- 5.5.4 Ensure safeguarding practices are embedded within curriculum design and delivery and that students are taught how to keep themselves safe (including online).
- 5.5.5 Be responsible for receiving allegations (including low level concerns) against members of staff, agency staff, contractors and volunteers (except where the allegation concerns the College Principal in which case the allegation should be reported to the Group Principal and CEO). The allegations should initially be discussed between the College Principal (the ‘case manager’) and Designated Safeguarding Lead (DSL) referring to the LADO threshold as set out in the Dealing with allegations of abuse against staff procedure.

5.6 Responsibilities of the STCG Group Designated Safeguarding Lead – Vice Principal Student Services

The Designated Safeguarding Lead has **lead responsibility for safeguarding in the Colleges**. The Designated Safeguarding Lead will:

- 5.6.1 Undertake the training, including Prevent awareness training, required to provide them with the knowledge and skills required to carry out the role. This training will updated at least every two years.
- 5.6.2 Understand the importance of information sharing and the requirements of data protection legislation and regulations.

- 5.6.3 Coordinate safeguarding practices across the Group and keep the Principals and CEO informed of ongoing enquiries under Section 47 and police investigations including the requirement for children to have an Appropriate Adult.
- 5.6.4 Work with College Principals and the Director of Human Resources to deal with allegations against members of staff, agency staff, contractors and volunteers.
- 5.6.5 Consult with the Group's 'case manager' Designated Officer from the relevant Local Authority as appropriate, in order to ensure that all allegations against staff, contractors and volunteers are dealt with in an objective and transparent way.
- 5.6.6 Ensure that the Director of Human Resources records details of any allegations against staff, agency staff, contractors and volunteers and carries out any agreed actions with the Designated Officer from the relevant Local Authority and reports on outcomes.
- 5.6.7 Act as a contact person within the Group for external safeguarding partners and provide advice and support to all staff (including temporary, supply staff and volunteers and members of the Governing Body) on safeguarding matters.
- 5.6.8 Work with College Principals/Vice Principals to promote educational outcomes for children who are experiencing welfare, safeguarding and child protection issues and identifying the impact that these issues might be having on their attendance, engagement and achievement.
- 5.6.9 Work with College Principals/Vice Principals to encourage a culture of listening to students when putting in place any measures to protect them.
- 5.6.10 Work with the Deputy Designated Safeguarding Leads to manage referrals and co-ordinate action within each College on child/adult at risk protection and Prevent issues.
- 5.6.11 Work with Deputy Designated Safeguarding Leads and pan-London and/or local Safeguarding partners and other agencies e.g. CAMHs as necessary to protect and promote the welfare of children.
- 5.6.12 Ensure students are aware of the issues around safeguarding and Prevent, through enrichment and tutorial activities and know who to talk to if they have any concerns.
- 5.6.13 Raise awareness about safeguarding and child protection on an on-going basis and be available during term time to discuss safeguarding concerns. Work with Deputy Designated Safeguarding Leads to ensure cover/out of hours arrangements are in place to enable staff to access advice.
- 5.6.14 Work with the Director of Human Resources and Vice Principal Quality and Digital Innovation to arrange updates on safeguarding and Prevent training for staff on, at least, an annual basis and induction training on child protection (including online) for new staff (to include relevant policies).
- 5.6.15 Ensure that child protection/safeguarding records are secure, kept up to date and maintained and transferred (where necessary) as required under KCSIE 2022.
- 5.7** Responsibilities of the Deputy Designated Safeguarding Leads (referred to as the Centre Lead in the Group Reporting Structure -page 15).

The DDSLs will:

- 5.7.1 Be trained to the same standard as the DSL and the DDSL role will be explicit within their job description.
- 5.7.2 Take operational responsibility for safeguarding in an individual College within the Group (which may include more than one site) or to deputise at other sites. Coordinate action within an individual college on child protection issues and raise awareness about safeguarding.
- 5.7.3 Work with the College Leadership Team in an individual college within the Group to ensure staff are aware of the issues around safeguarding and Prevent.
- 5.7.4 Work with the College Leadership Team in an individual college within the Group to ensure that students through enrichment and tutorial activities are aware of the issues around safeguarding and Prevent and know who to talk to if they have any concerns.
- 5.7.5 Advise and support safeguarding officers in an individual college, providing guidance on cases as appropriate.
- 5.7.6 Support Curriculum managers in an individual college to promote educational outcomes for children who are experiencing welfare, safeguarding and child protection issues and identifying the impact that these issues might be having might on their attendance, engagement and achievement. Support curriculum managers to provide additional academic support or reasonable adjustments to help children who have or have had a social worker, reach their potential, recognising that even when statutory intervention has ended, there is still a lasting impact on children’s educational outcomes.
- 5.7.7 Work with Curriculum Managers to encourage a culture of listening to students when putting in place any measures to protect them.
- 5.7.8 Oversee all safeguarding cases within a particular College, liaising with social workers, local authorities and other agencies.
- 5.7.9 Ensure detailed, accurate, secure written records of safeguarding concerns and referrals are recorded on CPOMS.
- 5.7.10 Ensure child protection files in an individual college are kept up-to-date, only accessed by those who need to see them and are transferred with leaving students where appropriate.
- 5.7.11 Make referrals to external agencies as appropriate.
- 5.7.12 Attend or work with pan-London or local safeguarding partners (previously boards) as appropriate.

5.8 Responsibilities of College Vice Principals

- 5.8.1 Work with DSL and Deputy DSL (Centre Lead) to effectively promote the educational outcomes for children who are experiencing welfare, safeguarding and child protection issues and identifying the impact that these issues might be having might on their attendance, engagement and achievement.
- 5.8.2 Foster a listening culture for students.

- 5.8.3 Work with the DSL and Deputy DSL to coordinate action if required where a child or adult is at risk.
- 5.8.4 Work with DSL and Deputy DSL and where appropriate local Safeguarding partners to protect and promote the welfare of children and adults at risk.
- 5.8.5 Ensure students are aware of issues around safeguarding and Prevent, through enrichment and tutorial activities and know who to talk to if they have any concerns.
- 5.8.6 Work with the College Principal to ensure cover/out of hours arrangements are in place to enable staff to access safeguarding advice.

5.9 Responsibilities of College Heads of School

The Head of School will:

- 5.9.1 Work with the relevant Safeguarding Officer and /or DSL/Deputy (Centre Lead) and teaching staff to:
- effectively promote the educational outcomes for children who are experiencing welfare, safeguarding and child protection issues and identifying the impact that these issues might be having on their attendance, engagement and achievement.
 - provide additional academic support or reasonable adjustments to help children who have or have had a social worker and or children who are experiencing welfare, safeguarding and child protection issues.
- 5.9.2 Ensure safeguarding practices are embedded within curriculum design and delivery including team meetings, progress reviews and CPD arrangements.

5.10 Responsibilities of Safeguarding Officers

The Safeguarding Officers will:

- 5.10.1 Fulfil responsibilities of all staff as set out in KCSIE 2022 (Part 1 & Annex B).
- 5.10.2 Receive reports/records of safeguarding concerns and record safeguarding concerns on CPOMS.
- 5.10.3 Assess concerns and take appropriate action in liaison with key parties as follows:
- Report serious/complex cases to the DSL /DDSL (centre lead)
 - Manage low/medium level cases
 - Meet with student/s about whom there are concerns/who have made disclosures
 - Refer students to support services (external or internal as required)
 - Liaise with School staff/managers to ensure a case is managed effectively, appropriate action is taken to safeguard the student
 - Liaise with Pastoral / Personal Tutor/School staff to ensure issues impacting academic attendance/achievement and reasonable adjustments are identified

- Log accurate, confidential and comprehensive written notes on the safeguarding system (CPOMS)
- Refer cases to external agencies when necessary
- Liaise with external agencies working with a student, as appropriate, to safeguard the student
- Attend safeguarding committee meetings with the DDSL to discuss any cases

5.10.4 Undertake relevant safeguarding training as directed by the DSL/Deputy DSL.

5.10.5 Cascade important safeguarding updates to department/colleagues.

5.10.6 Champion and promote key safeguarding issues across the College.

5.10.7 **Responsibilities of individual members of staff (see attached flowcharts for individual college)**

All staff have a responsibility to safeguard and promote the welfare of children/adults at risk and should:

5.10.8 Provide a safe environment in which children can learn and all staff should be prepared to identify children who may benefit from early help. Early help means providing support as soon as a problem emerges.

5.11.2 Be prepared to identify children who may benefit from early help and be aware of their local early help process.

5.11.2 Be familiar with how to make a safeguarding referral, and any staff member who has a concern about a child's welfare should follow the Group's referral processes.

5.11.3 Undertake initial safeguarding training followed by regular updates.

5.11.4 Know what to do if a child tells them he/she is being abused/neglected and record in writing all safeguarding concerns/disclosures discussions, decisions made and the reasons for them.

5.11.5 Be aware that abuse, neglect are rarely standalone issues and can take place within and outside of families (extrafamilial), online and between children. All staff should be aware of the Group's **child-on-child** abuse procedures.

5.11.6 Reassure victims that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

5.11.7 Be aware that children may not feel ready or know how to tell someone that they are being abused, exploited or neglected, and or they may not recognise their experiences as harmful.

5.11.8 Be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation

- 5.11.9 Be aware that, whilst all staff should speak to the designated safeguarding lead (or deputy) with regard to any concerns about female genital mutilation (FGM), there is a specific legal duty on teachers. If a teacher, in the course of their work in the profession, discovers that an act of FGM appears to have been carried out on a girl under the age of 18, the teacher has a duty to ensure this is reported to the police.
- 5.11.9 Refer any concerns they may have about any member of staff in relation to the safeguarding of a child or adult at risk to the College Principal.
- 5.11.10 Be aware of the Groups unauthorised absence and children missing from education procedures as set out in the Student Attendance, Behaviour and Commitment to Study Procedures (ABC).

6. Whistleblowing

- 6.1 As stated in KCSIE 2022, ‘all staff and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in the school’s or college’s safeguarding regime and know that such concerns will be taken seriously by the senior Leadership team.’
- 6.2 If a member of staff, governor, volunteer or visitor has concerns about how a potential or actual safeguarding case is being managed, these should be raised with the Designated Safeguarding Lead in the first instance. If the person raising the concern is not satisfied with the response and believes that there are significant failings, then the whistleblowing policy should be consulted.

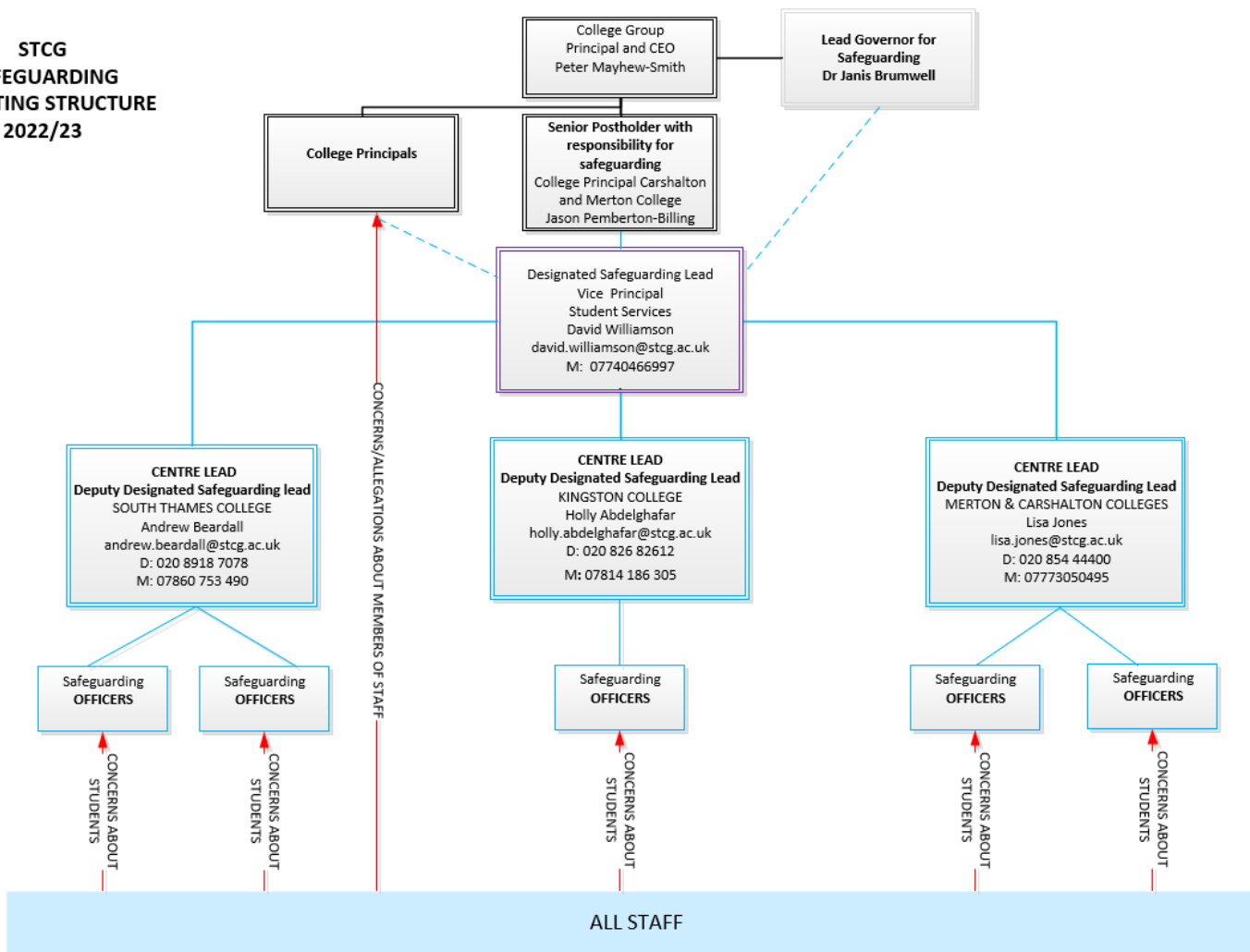
7. Review

- 7.1. The policy will be subject to, at least, annual review and approval by Governors. The review will be initiated by the Designated Safeguarding Lead and will involve consultation with staff, managers, governors and students where appropriate.

8. Access to the policy

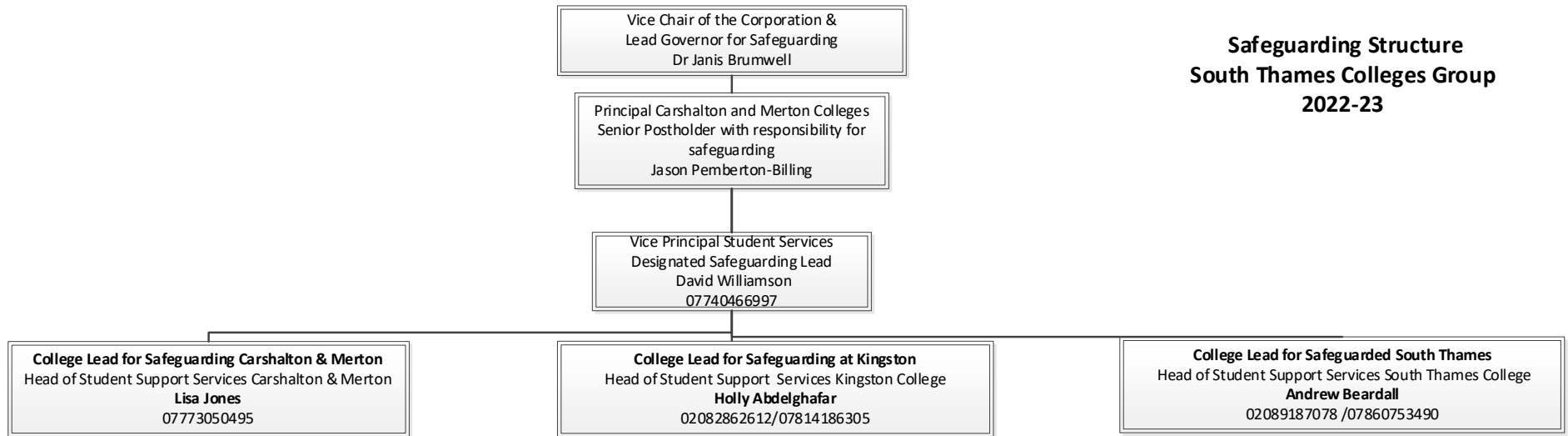
- 8.1. The policy will be published on the Group website.

**STCG
SAFEGUARDING
REPORTING STRUCTURE
2022/23**



Policy Title – Safeguarding Children and Adults at Risk Policy	Staff Member Responsible: Vice Principal – Student Services
Version: Final	Review Date: July 2023

**Safeguarding Structure
South Thames Colleges Group
2022-23**



2022-23 Safeguarding Team names at STC, Kingston, Carshalton, Merton will be published 12th Sept

Policy Title – Safeguarding Children and Adults at Risk Policy	Staff Member Responsible: Vice Principal – Student Services
Version: Final	Review Date: July 2023

Appendix 1: KCSiE Part One: Safeguarding information for all staff

URGENT: Once staff have read this document, they must go into CASCADE and tick the **'I have read and understood Part One: Safeguarding Information for all Staff'**

What school and college staff should know and do

A child centred and coordinated approach to safeguarding

1. Schools, colleges, and their staff are an important part of the wider safeguarding system for children. This system is described in statutory guidance Working Together to Safeguard Children.
2. Safeguarding and promoting the welfare of children is **everyone's** responsibility. **Everyone** who comes into contact with children and their families has a role to play. In order to fulfil this responsibility effectively, all practitioners should make sure their approach is child-centred. This means that they should consider, at all times, what is in the **best interest** of the child.
3. No single practitioner can have a full picture of a child's needs and circumstances. If children and families are to receive the right help at the right time, **everyone** who comes into contact with them has a role to play in identifying concerns, sharing information and taking prompt action.
4. Safeguarding and promoting the welfare of children is defined for the purposes of this guidance 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.
5. Children includes everyone under the age of 18.

The role of school and college staff

6. School and college staff are particularly important as they are in a position to identify concerns early, provide help for children, and prevent concerns from escalating.
7. **All** staff have a responsibility to provide a safe environment in which children can learn.
8. **All** staff should be prepared to identify children who may benefit from early help⁴. Early help means providing support as soon as a problem emerges at any point in a child's life, from the foundation years through to the teenage years.
9. **Any staff member** who has **any** concerns about a child's welfare should follow the processes set out in paragraphs 51-67. Staff should expect to support social workers and other agencies following any referral.
10. **Every** school and college should have a designated safeguarding lead who will provide support to staff to carry put their safeguarding duties and who will liaise closely with other services such as local authority children's social care.

⁴ Detailed information on early help can be found in Chapter 1 of Working Together to Safeguard Children.

11. The designated safeguarding lead (and any deputies) are most likely to have a complete safeguarding picture and be the most appropriate person to advise on the response to safeguarding concerns.
12. The Teachers' Standards 2012 state that teachers (which includes head teachers) should safeguard children's wellbeing and maintain public trust in the teaching profession as part of their professional duties.⁵

What school and college staff need to know

13. **All** staff should be aware of systems within their school or college which support safeguarding and these should be explained to them as part of staff induction. This should include the:
 - child protection policy (which should amongst other things also include the policy and procedures to deal with child-on-child abuse)
 - behaviour policy (which should include measures to prevent bullying, including cyberbullying, prejudice based and discriminatory bullying)⁶
 - staff behaviour policy (sometimes called a code of conduct) should amongst other things, include low-level concerns, allegations against staff and whistleblowing
 - safeguarding response to children who go missing from education; and
 - role of the designated safeguarding lead (including the identity of the designated safeguarding lead and any deputies).

Copies of policies and a copy of Part One (or Annex A, if appropriate) of this document should be provided to **all** staff at induction.

14. **All** staff should receive appropriate safeguarding and child protection training (including on-line safety) at induction. The training should be regularly updated. In addition, **all** staff should receive safeguarding and child protection (including on-line safety) updates (for example, via email, e-bulletins and staff meetings), as required, and at least annually, to continue provide them with relevant skills and knowledge to safeguard children effectively.
 15. **All** staff should be aware of their local early help process and understand their role in it.
 16. **All** staff should be aware of the process for making referrals to children's social care and for statutory assessments⁷ under the Children Act 1989, especially section 17 (children in need) and section 47 (a child suffering, or likely to suffer, significant harm) that may follow a referral, along with the role they might be expected to play in such assessments.
 17. **All** staff should know what to do if a child tells them that they are being abused, exploited or neglected. Staff should know how to manage the requirement to maintain an appropriate level of confidentiality. This means only involving those who need to be involved, such as the designated safeguarding lead (or a deputy) and local authority children's social care. Staff should never promise a child that they will not tell anyone as this may ultimately not be in the best interests of the child.
5. The **Teachers' Standards** apply to: trainees working towards QTS; all teachers completing their statutory induction period (newly qualified teachers [NQTs]); and teachers in maintained schools, including maintained special schools, who are subject to the Education (School Teachers' Appraisal) (England) Regulations 2012.
6. All schools are required to have a behaviour policy (full details are here). If a college chooses to have a behaviour policy, it should be provided to staff as described above.
7. Detailed information on statutory assessments can be found in Chapter 1 of Working Together to Safeguard Children

18. **All** staff should be able to reassure victims that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting **any** form of abuse and/or neglect. Nor should a victim ever be made to feel ashamed for making a report.
19. **All staff** should be aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. For example, children may feel embarrassed, humiliated, or threatened. This could be due to their vulnerability, disability and/or sexual orientation or language barriers. This should not prevent staff from having a professional curiosity and speaking to the DSL if they have concerns about a child. It is also important that staff determine how best to build trusted relationships with children and young people which facilitate communication.

What school and college staff should look out for:

Early help

20. **Any** child may benefit from early help, but all school and college staff should be particularly alert to the potential need for early help for a child who:
- 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 at risk of modern slavery, trafficking or sexual or criminal exploitation
 - is at risk of being radicalised or exploited
 - has a family member in prison, or is affected by parental offending
 - is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
 - is misusing alcohol and other drugs themselves
 - has returned home to their family from care
 - is at risk of 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage
 - is a privately fostered child, and
 - is persistently absent from education, including persistent absences for part of the school day.

Abuse and neglect

21. **All** staff should be aware of indicators of abuse and neglect (see below) understanding that children can be at risk of harm inside and outside the school/college, inside and outside of home and online. Exercising professional curiosity and knowing what to look for is vital to the early identification of abuse and neglect so that staff are able to identify cases of children who may be in need of help or protection.

22. **All** school and college staff should be aware that abuse, neglect and safeguarding issues are rarely standalone events and cannot be covered by one definition or one label alone. In most cases, multiple issues will overlap with one another.
23. **All** staff, but especially the designated safeguarding lead (and deputies) should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual abuse (including harassment and exploitation), domestic abuse in their own intimate relationships (teenage relationship abuse), criminal exploitation, serious youth violence, county lines, and radicalisation.
24. **All** staff should be aware that technology is a significant component in many safeguarding and wellbeing issues. Children are at risk of abuse and other risks online as well as face to face. In many cases abuse will take place concurrently both online and offline life. Children can also abuse other children online, this can take the form of abusive, harassing, and misogynistic/misandrist messages, the non-consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography, to those who do not want to receive such content
25. **In all cases, if staff are unsure, they should always speak to the designated safeguarding lead or deputy.**

Indicators of abuse and neglect

26. **Abuse:** a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children.
27. **Physical abuse:** a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.
28. **Emotional abuse:** the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning or preventing the child from participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

29. **Sexual abuse:** involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education and **all** staff should be aware of it and of their school or college’s policy and procedures for dealing with it.
30. **Neglect:** the persistent failure to meet a child’s basic physical and/or psychological needs, likely to result in the serious impairment of the child’s health or development. Neglect may occur during pregnancy, for example, as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child 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, a child’s basic emotional needs.

Safeguarding issues

31. **All** staff should have an awareness of safeguarding issues that can put children at risk of harm. Behaviours linked to issues such as drug taking and/or alcohol misuse, deliberately missing education, serious violence (including that linked to county lines), radicalisation and consensual and non-consensual sharing of nude and semi-nude images and/or videos⁸ can be signs that children are at risk. **Additional information on these safeguarding issues and information on other safeguarding issues is included in Annex B.**

Child-on-child abuse

32. All staff should be aware that children can abuse other children (often referred to as peer-on-peer abuse) and that it can happen both inside and outside of school or college and online. **All** staff should be clear as to the school’s or college’s policy and procedures with regard to child-on-child abuse and the important role they have to play in preventing it and responding where they believe a child may be at risk from it.
33. **All** staff should understand, that even if there are no reports in their schools or colleges it does not mean it is not happening, it may be the case that it is just not being reported. As such it is important if staff have **any** concerns regarding child-on-child abuse, they should speak to their designated safeguarding lead (or deputy).

8 Consensual image sharing, especially between older children of the same age, may require a different response. It might not be abuse – but children still need to know it is illegal – whilst non-consensual is illegal and abusive. UKCIS provides detailed advice about sharing of nudes and semi-nude images and videos.

34. It is essential that **all** staff understand the importance of challenging inappropriate behaviours between children, many of which are listed below, that are abusive in nature. Downplaying certain behaviours, for example dismissing sexual harassment as “just banter”, “just having a laugh”, “part of growing up” or “boys being boys” can lead to a culture of unacceptable behaviours, an unsafe environment for children and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it.
35. Child-on-child abuse is most likely to include, but may not be limited to:
- bullying (including cyberbullying, prejudiced based and discriminatory bullying)
 - abuse in intimate personal relationships between children (sometimes known as ‘teenage relationship abuse’)
 - physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
 - sexual violence⁹, such as rape, assault by penetration and sexual assault; (this may include an online element which facilitates, threatens and/or encourages sexual violence)
 - sexual harassment,¹⁰ such as sexual comments, remarks, jokes and online sexual harassment, which may be stand-alone or part of a broader pattern of abuse
 - causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
 - consensual and non-consensual sharing of nude and semi-nude images and or videos¹¹ (also known as sexting or youth produced sexual imagery)
 - upskirting¹², which typically involves taking a picture under a person’s clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm; and
 - initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)

36. Both CSE and CCE are forms of abuse that occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in sexual or criminal activity, in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. CSE and CCE can affect children, both male and female and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation.

9. For further information about sexual violence see Part 5 and Annex B

10. For further information about sexual harassment see Part 5 and Annex B

11. UKCIS guidance: Sharing nudes and semi-nudes advice for education settings

12. For further information about ‘upskirting’ see Annex B

Child Criminal Exploitation (CCE)

37. Some specific forms of CCE can include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting or pickpocketing. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others.
38. Children can become trapped by this type of exploitation, as perpetrators can threaten victims (and their families) with violence or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others. As children involved in criminal exploitation often commit crimes themselves, their vulnerability as victims is not always recognised by adults and professionals, (particularly older children), and they are not treated as victims despite the harm they have experienced. They may still have been criminally exploited even if the activity appears to be something they have agreed or consented to.
39. It is important to note that the experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however professionals should be aware that girls are at risk of criminal exploitation too. It is also important to note that both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

Child Sexual Exploitation (CSE)

40. CSE is a form of child sexual abuse. Sexual abuse may involve physical contact, including assault by penetration (for example, rape or oral sex) or nonpenetrative acts such as masturbation, kissing, rubbing, and touching outside clothing. It may include non-contact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse including via the internet.
41. CSE can occur over time or be a one-off occurrence, and may happen without the child's immediate knowledge e.g., through others sharing videos or images of them on social media.
42. CSE can affect any child, who has been coerced into engaging in sexual activities. This includes 16 and 17-year-olds who can legally consent to have sex. Some children may not realise they are being exploited e.g. they believe they are in a genuine romantic relationship.

Domestic Abuse

43. Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional. Children can be victims of domestic abuse. They may see or hear, or experience the effects of abuse at home and /or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have a detrimental long-term impact on their health, well-being, development, and ability to learn.

Female Genital Mutilation

44. Whilst **all** staff should speak to the designated safeguarding lead (or deputy) with regard to any concerns about female genital mutilation (FGM), there is a specific **legal duty on teachers**¹³ If a teacher, in the course of their work in the profession, discovers that an act of FGM appears to have been carried out on a girl under the age of 18, the teacher **must** report this to the police.

Mental Health

45. **All** staff should also be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.
46. Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Education staff, however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one. Schools and colleges can access a range of advice to help them identify children in need of extra mental health support, this includes working with external agencies.
47. If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following their child protection policy and speaking to the designated safeguarding lead or a deputy.

Serious violence

48. All staff should be aware of indicators, which may signal that children are at risk from, or are involved with serious violent crime. These may include increased absence from school, 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 and may be at risk of criminal exploitation

Additional information and support

49. Departmental advice [What to Do if You Are Worried a Child is Being Abused - Advice for Practitioners](#) provides more information on understanding and identifying abuse and neglect. Examples of potential indicators of abuse and neglect are highlighted throughout the advice and will be particularly helpful for school and college staff. The [NSPCC](#) website also provides useful additional information on abuse and neglect and what to look out for.
50. **Annex B** contains important additional information about specific forms of abuse and safeguarding issues. School and college leaders and those staff who work directly with children should read the annex.

¹³ Under section 5B (11) of the Female Genital Mutilation Act 2003, “teacher” means, in relation to England, a person within section 141A (1) of the Education act 2002 (persons employed or engaged to carry out teaching work at schools and other institutions in England).

What school and college staff should do if they have concerns about a child

51. Staff working with children are advised to maintain an attitude of ‘**it could happen here**’ where safeguarding is concerned. When concerned about the welfare of a child, staff should always act in the **best** interests of the child.
52. If staff have **any concerns** about a child’s welfare, they should act on them **immediately**. See page 29 for a flow chart setting out the process for staff when they have concerns about a child.
53. If staff have a concern, they should follow their own organisation’s child protection policy and speak to the designated safeguarding lead (or deputy).
54. Options will then include:
 - managing any support for the child internally via the school’s or college’s own pastoral support processes
 - undertaking an early help assessment;¹⁴ or
 - making a referral for statutory services,¹⁵ for example as the child might be in need, is in need or suffering or likely to suffer harm.
55. The designated safeguarding lead or a deputy should always be available to discuss safeguarding concerns. If in exceptional circumstances, the designated safeguarding lead (or deputy) is not available, this should not delay appropriate action being taken. Staff should consider speaking to a member of the senior leadership team and/or take advice from local children’s social care. In these circumstances, any action taken should be shared with the designated safeguarding lead (or deputy) as soon as is practically possible.
56. Staff should not assume a colleague or another professional will take action and share information that might be critical in keeping children safe. They should be mindful that early information sharing is vital for effective identification, assessment and allocation of appropriate service provision whether this is when problems first emerge, or where a child is already known to local authority children’s social care (such as a child in need or a child with a protection plan). Information Sharing: Advice for Practitioners Providing Safeguarding Services to Children, Young People, Parents and Carers supports staff who have to make decisions about sharing information. This advice includes the seven golden rules for sharing information and considerations with regard to the Data Protection Act 2018 (DPA) and UK General Data Protection Regulation (UK GDPR).
57. DPA and UK GDPR **do not** prevent the sharing of information for the purposes of keeping children safe and promoting their welfare. If in any doubt about sharing information, staff should speak to the designated safeguarding lead or a deputy. Fears about sharing information **must not** be allowed to stand in the way of the need to safeguard and promote the welfare of children.

¹⁴ Further information on early help assessments, provision of early help services and accessing services is in Chapter 1 of Working Together to Safeguard Children.

¹⁵ Chapter 1 of Working Together to Safeguard Children sets out that the safeguarding partners should publish a threshold document that should include the criteria, including the level of need, for when a case should be referred to local authority children’s social care for assessment and for statutory services under section 17 and 47. Local authorities, with their partners, should develop and publish local protocols for assessment. A local protocol should set out clear arrangements for how cases will be managed once a child is referred into local authority children’s social care.

Early help assessment

58. If early help is appropriate, the designated safeguarding lead (or deputy) will generally lead on liaising with other agencies and setting up an inter-agency assessment as appropriate. Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead practitioner. Any such cases should be kept under constant review and consideration given to a referral to children’s social care for assessment for statutory services if the child’s situation does not appear to be improving or is getting worse.

Statutory children’s social care assessments and services assessments

59. **Where a child is suffering, or is likely to suffer from harm, it is important that a referral to local authority children’s social care (and if appropriate the police) is made immediately.** Referrals should follow the local referral process.
60. Local authority children’s social care assessments should consider where children are being harmed in contexts outside the home, so it is important that schools and colleges provide as much information as possible as part of the referral process. This will allow any assessment to consider all the available evidence and enable a contextual approach to address such harm. Additional information is available here: [Contextual Safeguarding](#).
61. The online tool [Report Child Abuse to Your Local Council](#) directs to the relevant local children’s social care contact number.

Children in need

62. A child in need is defined under the Children Act 1989 as a child who is unlikely to achieve or maintain a reasonable level of health or development, or whose health and development is likely to be significantly or further impaired, without the provision of services; or a child who is disabled. Local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare. Children in need may be assessed under section 17 of the Children Act 1989.

Children suffering or likely to suffer significant harm

63. Local authorities, with the help of other organisations as appropriate, have a duty to make enquiries under section 47 of the Children Act 1989 if they have reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm. Such enquiries enable them to decide whether they should take any action to safeguard and promote the child’s welfare and must be initiated where there are concerns about maltreatment. This includes all forms of abuse and neglect.

What will the local authority do?

64. Within one working day of a referral being made, a local authority social worker should acknowledge its receipt to the referrer and make a decision about the next steps and the type of response that is required. This will include determining whether:
- 65.
- the child requires immediate protection and urgent action is required
 - any services are required by the child and family and what type of services

- the child is in need and should be assessed under section 17 of the Children Act 1989. Chapter one of [Working together to Safeguard Children](#) provides details of the assessment process
- there is reasonable cause to suspect the child is suffering or likely to suffer significant harm, and whether enquiries must be made, and the child assessed under section 47 of the Children Act 1989. Chapter one of [Working Together to Safeguard Children](#) provides details of the assessment process, and
- further specialist assessments are required to help the local authority to decide what further action to take.

66. The referrer should follow up if this information is not forthcoming.

67. If social workers decide to carry out a statutory assessment, staff should do everything they can to support that assessment (supported by the designated safeguarding lead (or deputy) as required).

68. If, after a referral, the child's situation does not appear to be improving, the referrer should consider following local escalation procedures to ensure their concerns have been addressed and, most importantly, that the child's situation improves.

Record keeping

69. **All** concerns, discussions and decisions made, and the reasons for those decisions, should be recorded in writing. This will also help if/when responding to any complaints about the way a case has been handled by the school or college. Information should be kept confidential and stored securely. It is good practice to keep concerns and referrals in a separate child protection file for each child.

Records should include:

- a clear and comprehensive summary of the concern
- details of how the concern was followed up and resolved
- a note of any action taken, decisions reached and the outcome.

70. If in doubt about recording requirements, staff should discuss with the designated safeguarding lead (or deputy).

Why is all of this important?

71. It is important for children to receive the right help at the right time to address safeguarding risks, prevent issues escalating and to promote children's welfare. Research and serious case reviews have repeatedly shown the dangers of failing to take effective action.¹⁶ Further information about serious case reviews can be found in Chapter four of [Working together to Safeguard Children](#). Examples of poor practice include:

- failing to act on and refer the early signs of abuse and neglect
- poor record keeping
- failing to listen to the views of the child
- failing to re-assess concerns when situations do not improve

¹⁶ An analysis of serious case reviews can be found at <https://www.gov.uk/government/publications/analysis-of-serious-case-reviews-2014-to-2017>

- not sharing information with the right people within and between agencies
- sharing information too slowly, and
- a lack of challenge to those who appear not to be taking action.

What school or college staff should do if they have a safeguarding concern or an allegation about another staff member

72. Schools and colleges should have processes and procedures in place to manage **any** safeguarding allegation, or concern (no matter how small), about staff members (including supply staff, volunteers, and contractors).
73. If staff have safeguarding concerns or an allegation is made about another member of staff (including supply staff, volunteers, and contractors) **posing a risk of harm**, then
- This should be referred to the headteacher or principal
 - where there are concerns/allegations about the head teacher or principal, this should be referred to the chair of governors, chair of the management committee or proprietor of an independent school; and
 - in the event of concerns/allegations about the head teacher, where the head teacher is also the sole proprietor of an independent school, or a situation where there is a conflict of interest in reporting the matter to the headteacher, this should be reported directly to the local authority designated officer(s) (LADOs). Details of your LADO should be easily accessible on your local authority’s website.
74. If staff have a safeguarding concern or an allegation about another member of staff (including supply staff, volunteers or contractors) that **does not** meet the harm threshold, then this should be shared in accordance with the school or college low-level concerns policy. Further details can be found in Part four of this guidance.

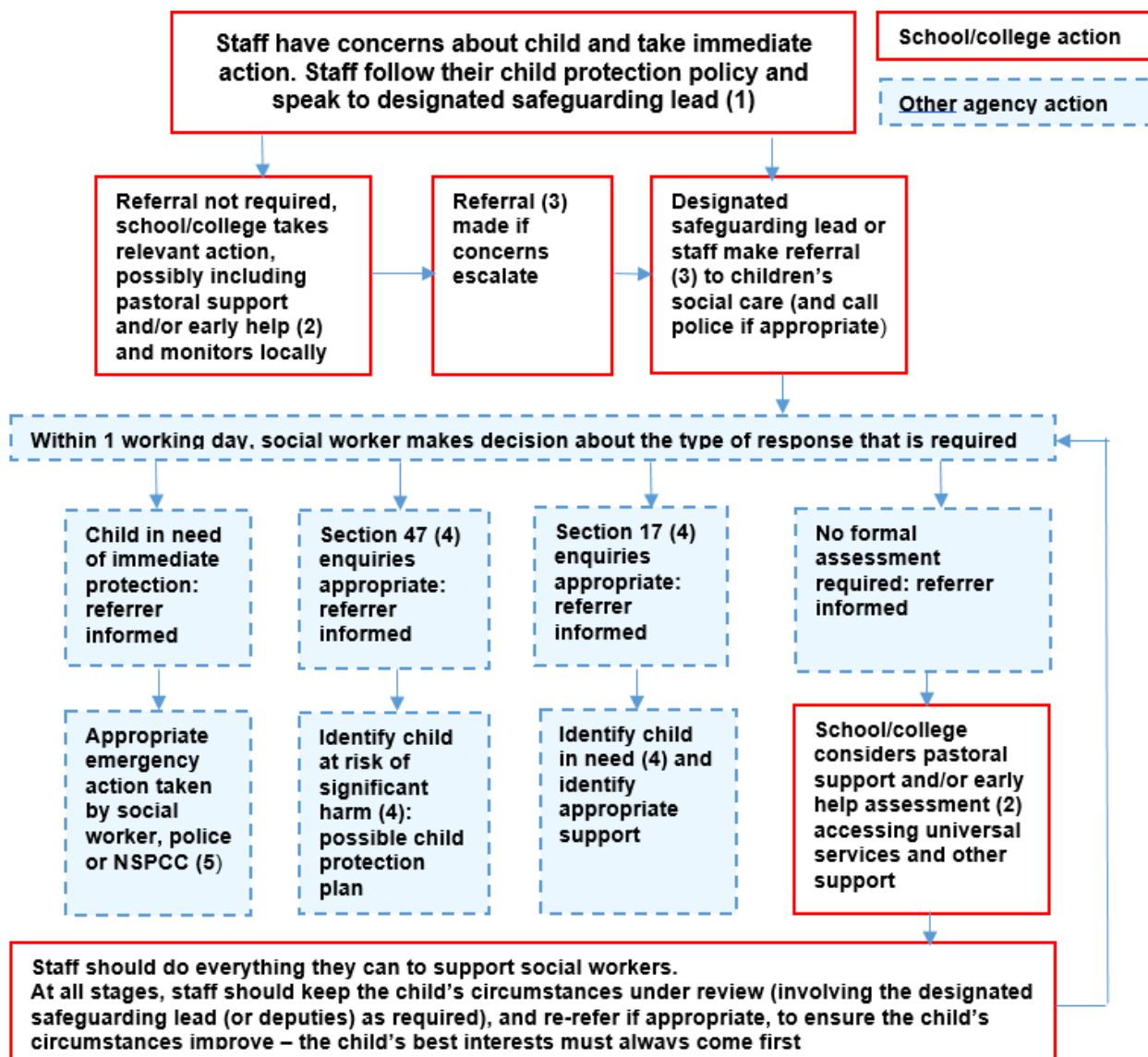
What school or college staff should do if they have concerns about safeguarding practices within the school or college

75. All staff and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in the school’s or college’s safeguarding regime and know that such concerns will be taken seriously by the senior leadership team.
76. Appropriate whistleblowing procedures should be put in place for such concerns to be raised with the school’s or college’s senior leadership team.
77. Where a staff member feels unable to raise an issue with their employer, or feels that their genuine concerns are not being addressed, other whistleblowing channels are open to them:
- general guidance on whistleblowing can be found via: [Advice on Whistleblowing](#); and
 - the [NSPCC’s what you can do to report abuse dedicated helpline](#) is available as an alternative route for staff who do not feel able to raise concerns regarding child protection failures internally or have concerns about the way a concern is being handled by their school or college. Staff can call 0800 028 0285 – line is available from 8:00 AM to 8:00 PM, Monday to Friday and email: help@nspcc.org.uk.¹⁷

17. Alternatively, staff can write to: National Society for the Prevention of Cruelty to Children (NSPCC), Weston House, Curtain Road, London EC2A 3NH

Policy Title – Safeguarding Children and Adults at Risk Policy	Staff Member Responsible: Vice Principal – Student Services
Version: Final	Review Date: July 2023

Actions where there are concerns about a child



- (1) In cases which also involve a concern or an allegation of abuse against a staff member, see Part Four of this guidance.
- (2) Early help means providing support as soon as a problem emerges at any point in a child's life. Where a child would benefit from co-ordinated early help, an early help inter-agency assessment should be arranged. Chapter one of [Working together to Safeguard Children](#) provides detailed guidance on the early help process.
- (3) Referrals should follow the process set out in the local threshold document and local protocol for assessment. Chapter one of [Working together to Safeguard Children](#).
- (4) Under the Children Act 1989, local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare. Children in need may be assessed under section 17 of the Children Act 1989. Under section 47 of the Children Act 1989, where a local authority has reasonable cause to suspect that a child is suffering or likely to suffer significant harm, it has a duty to make enquiries to decide whether to take action to safeguard or promote the child's welfare. Full details are in Chapter one of [Working together to Safeguard Children](#).
- (5) This could include applying for an Emergency Protection Order (EPO).

Appendix 2: Actions where there are concerns about an Adult at Risk

Safeguarding will apply to any adult who:

- Has needs for care and support (whether or not the authority is meeting any of those needs)
- Is experiencing, or is at risk of, abuse or neglect, and
- As a result of those needs is unable to protect himself or herself against the abuse or neglect or the risk of it

Abuse: Abuse is a form of maltreatment of a person. Somebody may abuse or neglect a person by inflicting harm, or by failing to act to prevent harm.

In making a decision whether to refer or not, the designated safeguarding lead or deputy designated safeguarding lead should take into account:

- (1) the adult's wishes and preferred outcome
- (2) whether the adult has mental capacity to make an informed decision about their own and others' safety
- (3) the safety or wellbeing of children or other adults with care and support needs
- (4) whether there is a person in a position of trust involved
- (5) whether a crime has been committed

This should inform the decision whether to notify the concern to the following people:

- the police if a crime has been committed and/or
- the Adult Safeguarding Team for possible safeguarding enquiry
- relevant regulatory bodies such as Care Quality Commission, Ofsted, Charities commission
- service commissioning teams
- family/relatives as appropriate (seek advice from adult social services)

A record of the reasons for referring the concern or reasons for not referring must be kept. Incidents of abuse may be one-off or multiple and may affect one person or more. Staff and volunteers should look beyond single incidents to identify patterns of harm. Accurate recording of information will also assist in recognising any patterns.

The designated safeguarding adults lead should be responsible for providing acknowledgement of the referral and brief feedback to the person raising the original concern. Feedback should be given in a way that will not make the situation worse or breach the Data Protection Act. If the police are involved, they should be consulted prior to giving feedback to the referrer to ensure any criminal investigation is not affected.

The local authority will decide on who will lead on a safeguarding enquiry should it progress to that stage. The named organisation should not conduct its own safeguarding enquiry unless instructed to do so by the local authority.

Appendix 3: Annex B: Further information

Annex B contains important additional information about specific forms of abuse and safeguarding issues. School and college leaders and those staff who work directly with children should read this annex.

As per Part one of this guidance, if staff have any concerns about a child's welfare, they should act on them immediately. They should follow their own organisation's child protection policy and speak to the designated safeguarding lead (or deputy).

Where a child is suffering, or is likely to suffer from harm, it is important that a referral to children's social care (and if appropriate the police) is made immediately.

Child abduction and community safety incidents

Child abduction is the unauthorised removal or retention of a minor from a parent or anyone with legal responsibility for the child. Child abduction can be committed by parents or other family members; by people known but not related to the victim (such as neighbours, friends and acquaintances); and by strangers.

Other community safety incidents in the vicinity of a school can raise concerns amongst children and parents, for example, people loitering nearby or unknown adults engaging children in conversation.

As children get older and are granted more independence (for example, as they start walking to school on their own) it is important they are given practical advice on how to keep themselves safe. Many schools provide outdoor-safety lessons run by teachers or by local police staff.

It is important that lessons focus on building children's confidence and abilities rather than simply warning them about all strangers. Further information is available at: www.actionagainstabduction.org and www.clevernevergoes.org.

Child Criminal Exploitation (CCE) and Child Sexual Exploitation (CSE)

We know that different forms of harm often overlap, and that perpetrators may subject children and young people to multiple forms of abuse, such as criminal exploitation (including county lines) and sexual exploitation.

In some cases, the exploitation or abuse will be in exchange for something the victim needs or wants (for example, money, gifts or affection), and/or will be to the financial benefit or other advantage, such as increased status, of the perpetrator or facilitator.

Children can be exploited by adult males or females, as individuals or in groups. They may also be exploited by other children, who themselves may be experiencing exploitation – where this is the case, it is important that the child perpetrator is also recognised as a victim.

Whilst the age of the child may be a contributing factor for an imbalance of power, there are a range of other factors that could make a child more vulnerable to exploitation, including, sexual identity, cognitive ability, learning difficulties, communication ability, physical strength, status, and access to economic or other resources.

Some of the following can be indicators of both child criminal and sexual exploitation where children:

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

Children who have been exploited will need additional support to help keep them in education.

Child Sexual Exploitation can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence.

Some additional specific indicators that may be present in CSE are children who:

- have older boyfriends or girlfriends; and
- suffer from sexually transmitted infections, display sexual behaviours beyond expected sexual development or become pregnant.

Further information on signs of a child's involvement in sexual exploitation is available in Home Office guidance: [Child sexual exploitation: guide for practitioners](#)

County Lines

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one or more importing areas [within the UK], using dedicated mobile phone lines or other form of "deal line". This activity can happen locally as well as across the UK - no specified distance of travel is required. Children and vulnerable adults are exploited to move, store and sell drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims

Children can be targeted and recruited into county lines in a number of locations including any type of schools (including special schools), further and higher educational institutions, pupil referral units, children's homes and care homes.

Children are also increasingly being targeted and recruited online using social media. Children can easily become trapped by this type of exploitation as county lines gangs can manufacture drug debts which need to be worked off or threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

A number of the indicators for CSE and CCE as detailed above may be applicable to where children are involved in county lines. Some additional specific indicators that may be present where a child is criminally exploited through involvement in county lines are children who:

- go missing and are subsequently found in areas away from their home;
- have been the victim or perpetrator of serious violence (e.g. knife crime);
- are involved in receiving requests for drugs via a phone line, moving drugs, handing over and collecting money for drugs;

- are exposed to techniques such as ‘plugging’, where drugs are concealed internally to avoid detection
- are found in accommodation that they have no connection with, often called a ‘trap house or cuckooing’ or hotel room where there is drug activity
- owe a ‘debt bond’ to their exploiters
- have their bank accounts used to facilitate drug dealing.

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

Children and the court system

Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. There are two age-appropriate guides to support children **5-11-year-olds** and **12-17-year-olds**.

The guides explain each step of the process, support and special measures that are available. There are diagrams illustrating the courtroom structure and the use of video links is explained.

Making child arrangements via the family courts following separation can be stressful and entrench conflict in families. This can be stressful for children. The Ministry of Justice has launched an online child arrangements information tool with clear and concise information on the dispute resolution service. This may be useful for some parents and carers.

Children missing from education

All staff should be aware that children going missing from education, particularly repeatedly, can act as a vital warning sign of a range of safeguarding possibilities. This may include abuse and neglect, which may include sexual abuse or exploitation and can also be a sign of child criminal exploitation. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation, ‘honour-based abuse or risk of forced marriage. Early intervention is necessary to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child going missing in future. Staff should be aware of their school’s or college’s unauthorised absence and children missing from education procedures.

Children with family members in prison

Approximately 200,000 children in England and Wales have a parent sent to prison each year. These children are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. The National Information Centre on Children of Offenders [NICCO](#) provides information designed to support professionals working with offenders and their children, to help mitigate negative consequences for those children.

Cybercrime

Cybercrime is a criminal activity committed using computers and/or the internet. It is broadly categorised as either ‘cyber-enabled’ (crimes that can happen off-line but are enabled at scale and speed on-line) or ‘cyber-dependent’ (crimes that can be committed only by using a computer). Cyber-dependent crimes include:

- unauthorised access to computers (illegal ‘hacking’), for example accessing a school’s computer network to look for test paper answers or change grades awarded

- ‘Denial of Service’ (Dos or DDoS) attacks or ‘booting’. These are attempts to make a computer, network or website unavailable by overwhelming it with internet traffic from multiple sources and,
- making, supplying or obtaining malware (malicious software) such as viruses, spyware, ransomware, botnets and Remote Access Trojans with the intent to commit further offence, including those above.

Children with particular skills and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime.

If there are concerns about a child in this area, the designated safeguarding lead (or a deputy) should consider referring into the **Cyber Choices** programme. This is a nationwide police programme supported by the Home Office and led by the National Crime Agency, working with regional and local policing. It aims to intervene where young people are at risk of committing, or being drawn into, low- level cyber dependent offences and divert them to a more positive use of their skills and interests.

Note that **Cyber Choices** does not currently cover ‘cyber-enabled’ crime such as fraud, purchasing of illegal drugs on-line and child sexual abuse and exploitation, nor other areas of concern such as on-line bullying or general on-line safety.

Additional advice can be found at Cyber Choices NPCC- When to call the Police and National Cyber Security Centre – NCSC.GOV.UK

Domestic abuse

The Domestic Abuse Act 2021 received Royal Assent on 29 April 2021. The Act introduces the first ever statutory definition of domestic abuse and recognises the impact of domestic abuse on children, as victims in their own right, if they see, hear or experience the effects of abuse. The statutory definition of domestic abuse, based on the previous cross-government definition, ensures that different types of relationships are captured, including ex-partners and family members. The definition captures a range of different abusive behaviours, including physical, emotional and economic abuse and coercive and controlling behaviour. Both the person who is carrying out the behaviour and the person to whom the behaviour is directed towards must be aged 16 or over and they must be “personally connected” (as defined in section 2 of the 2021 Act).

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child to parent violence and abuse. Anyone can be a victim of domestic abuse, regardless of sexual identity, age, ethnicity, socioeconomic status, sexuality or background and domestic abuse can take place inside or outside of the home. The government will issue statutory guidance to provide further information for those working with domestic abuse victims and perpetrators, including the impact on children.

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

Young people can also experience domestic abuse within their own intimate relationships. This form of child-on-child abuse is sometimes referred to as ‘teenage relationship abuse’. Depending on the age of the young people, this may not be recognised in law under the statutory definition of ‘domestic abuse’ (if one or both parties are under 16). However, as with any child under 18, where there are concerns about safety or

welfare, child safeguarding procedures should be followed and both young victims and young perpetrators should be offered support.

Operation Encompass

Operation Encompass operates in all police forces across England. It helps police and schools work together to provide emotional and practical help to children. The system ensures that when police are called to an incident of domestic abuse, where there are children in the household who have experienced the domestic incident, the police will inform the key adult (usually the designated safeguarding lead) in school before the child or children arrive at school the following day. This ensures that the school has up to date relevant information about the child's circumstances and can enable immediate support to be put in place, according to the child's needs. Operation Encompass does not replace statutory safeguarding procedures. Where appropriate, the police and/or schools should make a referral to children's social care if they are concerned about a child's welfare. More information about the scheme and how schools can become involved is available on the Operation Encompass website.

Operation Encompass provides an advice and helpline service for all staff members from educational settings who may be concerned about children who have experienced domestic abuse. The helpline is available 8AM to 1PM, Monday to Friday on 0204 513 9990 (charged at local rate).

National Domestic Abuse Helpline

Refuge runs the National Domestic Abuse Helpline, which can be called free of charge and in confidence, 24 hours a day on 0808 2000 247. Its website provides guidance and support for potential victims, as well as those who are worried about friends and loved ones. It also has a form through which a safe time from the team for a call can be booked. Additional advice on identifying children who are affected by domestic abuse and how they can be helped is available at:

- [NSPCC- UK domestic-abuse Signs Symptoms Effects](#)
- Refuge what is domestic violence/effects of domestic violence on children
- Safe Young Lives: Young people and domestic abuse
- Domestic abuse: specialist sources of support - GOV.UK (www.gov.uk) (includes information for adult victims, young people facing abuse in their own relationships and parents experiencing child to parent violence/abuse)
- Home: Operation Encompass (includes information for schools on the impact of domestic abuse on children)

Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The designated safeguarding lead (and any deputies) should be aware of contact details and referral routes into the Local Housing Authority so they can raise/progress concerns at the earliest opportunity. Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property. Whilst referrals and or discussion with the Local Housing Authority should be progressed as appropriate, and in accordance with local procedures, this

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

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

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

Mental Health

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

More information can be found in the Mental health and Behaviour in Schools guidance. Colleges may also wish to follow this guidance as best practice. Public Health England had produced a range of resources to support secondary school teachers to promote positive health, wellbeing and resilience among children. See Every Mind Matters for links to all materials and lesson plans.

Modern Slavery and the National Referral Mechanism

Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including: sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs.

Further information on the signs that someone may be a victim of modern slavery, the support available to victims and how to refer them to the NRM is available in Statutory Guidance. [Modern slavery: how to identify and support victims - GOV.UK](#)

Preventing radicalisation

Children are vulnerable to extremist ideology and radicalisation. Similar to protecting children from other forms of harms and abuse, protecting children from this risk should be a part of a school’s or college’s safeguarding approach.

Extremism¹⁸ is the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces.

Radicalisation¹⁹ refers to the process by which someone comes to support terrorism and extremist ideologies associated terrorist groups.

Terrorism²⁰ is an action that endangers or causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat **must** be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

Although there is no single way of identifying whether a child is likely to be susceptible to an extremist ideology, there are possible indicators that should be taken into consideration alongside other factors and contexts. Background factors combined with specific influences such as family and friends may contribute to a child's vulnerability.

Similarly, radicalisation can occur through many different methods (such as social media or the internet) and settings (such as within the home).

However, it is possible to protect vulnerable people from extremist ideology and intervene to prevent those at risk of radicalisation being radicalised. As with other safeguarding risks, staff should be alert to changes in children's behaviour, which could indicate that they may be in need of help or protection. Staff should use their judgement in identifying children who might be at risk of radicalisation and act proportionately which may include the designated safeguarding lead (and any deputies) making a Prevent referral.

The Prevent duty

All schools and colleges are subject to a duty under section 26 of the Counterterrorism and Security Act 2015 (the CTSA 2015), in the exercise of their functions, to have "due regard²¹ to the need to prevent people from being drawn into terrorism"²². This duty is known as the Prevent duty.

The Prevent duty should be seen as part of schools' and colleges' wider safeguarding obligations. Designated safeguarding leads (and deputies) and other senior leaders in schools should familiarise themselves with the revised Prevent duty guidance: for England and Wales, especially paragraphs 57-76, which are specifically concerned with schools (and also covers childcare). Designated safeguarding leads and other senior leaders in colleges should familiarise themselves with the Prevent duty guidance: for further education institutions in England and Wales. The guidance is set out in terms of four general themes: risk assessment, working in partnership, staff training, and IT policies.

The school's or college's designated safeguarding lead (and any deputies) should be aware of local procedures for making a Prevent referral.

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

19. As defined in the Revised Prevent Duty Guidance for England and Wales, <https://www.gov.uk/government/publications/prevent-duty-guidance/revised-prevent-duty-guidance-forengland-and-wales>.

20. As defined in the Terrorism Act 2000 (TACT) <https://www.legislation.gov.uk/ukpga/2000/11/contents>

21. According to the Prevent duty guidance 'having due regard' means that the authorities should place an appropriate amount of weight on the need to prevent people being drawn into terrorism when they consider all the other factors relevant to how they carry out their usual functions.

22. Terrorism for these purposes has the same meaning as for the Terrorism Act 2000 (section 1(1) to (4) of that Act).

Channel

Channel is a voluntary, confidential support programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. Prevent referrals may be passed to a multi-agency Channel panel, which will discuss the individual referred to determine whether they are vulnerable to being drawn into terrorism and consider the appropriate support required. A representative from the school or college may be asked to attend the Channel panel to help with this assessment. An individual's engagement with the programme is entirely voluntary at all stages.

The designated safeguarding lead (or deputy) should consider if it would be appropriate to share any information with the new school or college in advance of a child leaving. For example, information that would allow the new school or college to continue supporting victims of abuse or those who are currently receiving support through the 'Channel' programme and have that support in place for when the child arrives.

Statutory guidance on Channel is available at: [Channel and Prevent Multi-Agency](#)

Additional support

The department has published advice for schools on the [Prevent duty](#). The advice is intended to complement the Prevent guidance and signposts to other sources of advice and support.

The Home Office has developed three e-learning modules:

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

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

For advice specific to further education, the Education and Training Foundation (ETF) hosts the [Prevent for FE and Training](#). This hosts a range of free, sector specific resources to support further education settings comply with the Prevent duty. This includes the Prevent Awareness e-learning, which offers an introduction to the duty, and the Prevent Referral e-learning, which is designed to support staff to make robust, informed and proportionate referrals.

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

London Grid for Learning have also produced useful resources on Prevent (Online Safety Resource centre-London Grid for Learning (www.lgfl.net)).

Sexual violence and sexual harassment between children in schools and colleges

Sexual violence and sexual harassment can occur between two children of any age and sex from primary to secondary stage and into colleges. It can also occur online. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.

Children 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 and will be exacerbated if the alleged perpetrator(s) attends the same school or college. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and face to face (both physically and verbally) and are never acceptable.

It is essential that **all** victims are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report. Detailed advice is available in Part five of this guidance.

Serious Violence

There are a number of indicators, which may signal children are at risk from, or are involved with, serious violent crime. These may include:

- Increased absence from school
- 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 associate with criminal networks or gangs and may be at risk of criminal exploitation.

The likelihood of involvement in serious violence may be increased by factors such as:

- being male
- having been frequently absent or permanently excluded from school
- having experienced child maltreatment and having been involved in offending, such as theft or robbery.

A fuller list of risk factors can be found in the Home Office's Serious Violence Strategy

Professionals should also be aware that violence can often peak in the hours just before or after school, when pupils are travelling to and from school. These times can be particularly risky for young people involved in serious violence.

Home Office funded Violence Reduction Units (VRU) operate in the 20 police force areas across England and Wales that have the highest volumes of serious violence, as measured by hospital admissions for injury with a sharp object. A list of these locations can be found [here](#). As the strategic co-ordinators for local violence prevention, each VRU is mandated to include at least one local education representative within their Core Membership group, which is responsible for setting the direction for VRU activity. Schools and educational partners within these areas are encouraged to reach out to their local VRU, either directly or via their education Core member, to better ingrain partnership working to tackle serious violence across local areas and ensure a joined-up approach to young people across the risk spectrum.

The Police, Crime, Sentencing and Courts Act will introduce in early 2023 a new duty on a range of specified authorities, such as the police, local government, youth offending teams, health and probation services, to work collaboratively, share data and information, and put in place plans to prevent and reduce serious violence within their local communities. Educational authorities and prisons/youth custody authorities will be under a separate duty to co-operate with core duty holders when asked, and there will be a requirement for the partnership to consult with all such institutions in their area.

The Duty is not intended to replace or duplicate existing safeguarding duties. Local partners may choose to meet the requirements of the Duty through existing multi-agency structures, such as multi-agency safeguarding arrangements, providing the correct set of partners are involved.

So-called ‘honour-based’ abuse (including Female Genital Mutilation and Forced Marriage)

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

Actions

If staff have a concern regarding a child who might be at risk of HBA or who has suffered from HBA, they should speak to the designated safeguarding lead (or deputy). As appropriate, the designated safeguarding lead (or deputy) will activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and local authority children’s social care. Where FGM has taken place, since 31 October 2015 there has been a mandatory reporting duty placed on **teachers**²³ that requires a different approach (see below).

FGM

FGM comprises all procedures involving the partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences.

FGM mandatory reporting duty for teachers

Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a statutory duty upon **teachers** along with regulated health and social care professionals in England and Wales, to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Those failing to report such cases may face disciplinary sanctions. It will be rare for teachers to see visual evidence, and they should not be examining pupils or students, but the same definition of what is meant by “to discover that an act of FGM appears to have been carried out” is used for all professionals to whom this mandatory reporting duty applies. Information on when and how to make a report can be found at: [Mandatory reporting of female genital mutilation procedural information](#)

²³ Under Section 5B(11)(a) of the Female Genital Mutilation Act 2003, ‘teacher’ means, in relation to England, a person within section 141A(1) of the Education Act (persons employed or engaged to carry out teaching work at schools and other institutions in England).

Teachers **must** personally report to the police cases where they discover that an act of FGM appears to have been carried out.²⁴ Unless the teacher has good reason not to, they should still consider and discuss any such case with the school's or college's designated safeguarding lead (or deputy) and involve children's social care as appropriate. The duty does not apply in relation to at risk or suspected cases (i.e., where the teacher does not discover that an act of FGM appears to have been carried out, either through disclosure by the victim or visual evidence) or in cases where the woman is 18 or over. In these cases, teachers should follow local safeguarding procedures. The following is a useful summary of the FGM mandatory reporting duty: [FGM Fact Sheet](#)

Further information can be found in the [Multi-agency statutory guidance on female genital mutilation and the FGM resource pack](#) particularly section 13.

Forced marriage

Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some perpetrators use perceived cultural practices as a way to coerce a person into marriage. Schools and colleges can play an important role in safeguarding children from forced marriage.

The Forced Marriage Unit has published [statutory guidance and multi-agency guidelines](#), pages 35-36 of which focus on the role of schools and colleges. School and college staff can contact the Forced Marriage Unit if they need advice or information: Contact: 020 7008 0151 or emailfmu@fco.gov.uk.

Section 5B (6) of the Female Genital Mutilation Act 2003 states teachers need not report a case to the police if they have reason to believe that another teacher has already reported the case.

Additional advice and support

There is a wealth of information available to support schools and colleges. The following list is not exhaustive but should provide a useful starting point:

Abuse

- [What to do if you are worried a child is being abused](#) – DfE advice
- [Domestic abuse: Various information / guidance](#) – Home Office
- [Faith based abuse: National Action Plan](#) – DfE advice
- [Disrespect NoBody campaign](#) – Home Office website
- [Tackling Child Sexual Abuse Strategy - GOV.UK \(www.gov.uk\)](#) Home Office policy paper
- [Stop abuse together \(campaign.gov.uk\)](#) HM Government Campaign

Bullying

- [Preventing bullying including cyberbullying](#) – DfE advice

²⁴ Section 5B(6) of the Female Genital Mutilation Act 2003 states teachers need not report a case to the police if they have reason to believe that another teacher has already reported the case.

Children missing from education, home or care

- [Children missing education](#) – DfE statutory guidance
- [Child missing from home or care](#) – DfE statutory guidance
- [Children and adults missing strategy](#) – Home Office strategy

Children with family members in prison

- [National Information Centre on Children of Offenders](#) – Barnardo’s in partnership with Her Majesty’s Prison and Probation Service (HMPPS)

Child Exploitation

- [Trafficking: safeguarding children](#) – DfE and Home Office guidance

Confidentiality

[Gillick competency Fraser guidelines](#) – Guidelines to help balancing children’s rights along with safeguarding responsibilities.

Drugs

- [Drugs: advice for schools](#) – DfE and Association of Chief Police Officers (ACPO) advice
- [Drugs strategy 20217](#) – Home Office
- [Information and advice on drugs](#) – Talk to Frank website
- [ADEPIS platform sharing information and resources for schools: covering drug \(and alcohol\) prevention](#) – Website developed by Mentor UK

Honour Based Violence (so called)

- [Female genital mutilation: information and resources](#) – Home Office guidance
- [Female genital mutilation: multi agency statutory guidance](#) – DfE, Department of Health and Social Care (DH) and Home Office

Health and wellbeing

- [Fabricated or induced illness: safeguarding children](#) – DfE, Department for Health and Social Care (DH) and Home Office
- [Rise Above: Free PSHE resources on health, wellbeing and resilience](#) – Public Health England
- [Medical conditions: supporting pupils at school](#) – DfE statutory guidance
- [Mental health and behaviour](#) – DfE Advice

Homelessness

- [Homelessness: How local authorities should exercise their functions](#) – Ministry of Housing, Communities and Local Government (MHCLG)

Online

- [Sexting: responding to incidents and safeguarding children](#) – UK council for Internet Safety

Private fostering

- [Private fostering: local authorities](#) – DfE statutory guidance

Radicalisation

- [Prevent duty guidance](#) – Home Office
- [Prevent duty advice for schools](#) – DfE advice
- [Educate Against Hate Website](#) – DfE and Home Office
- [Prevent for FE and Training](#) - Education and Training Foundation (ETF)

Upskirting

[Upskirting know your rights](#) – UK Government

Violence

- [Gangs and youth violence: advice for schools and colleges](#) – Home Office
- [Ending violence against women and girls 2016 to 2020 strategy](#) – Home Office
- [Violence against women and girls: national statement of expectations for victims](#) – Home Office
- [Sexual violence and sexual harassment between children in schools and colleges](#) – DfE advice
- [Serious violence strategy](#) – Home Office

Appendix 4: STCG Child-on-Child Abuse & Sexual Violence and Sexual Harassment Procedures

1. Introduction

South Thames Colleges Group, recognises that children can abuse other children (referred to as child-on-child abuse) and that it can take many forms. It can happen both inside and outside of school/college and online. Incidents of child-on-child abuse including sexual abuse and sexual harassment are not tolerated under any circumstances and will not be passed off as ‘banter or growing up’. A victim of child-on-child abuse will always be taken seriously, supported and kept safe.

The Group is committed to the prevention, early identification and appropriate management of child-on-child abuse. This is underpinned by the principle of a zero-tolerance approach to sexual violence and sexual harassment – it is never accepted. In cases where child-on-child abuse is identified, the Groups child protection procedures will be implemented, taking a contextual approach to support all our learners who have been affected by the situation.

The Group recognises that child-on-child abuse can manifest itself in many ways such as:

- bullying (including cyberbullying, prejudiced based and discriminatory bullying);
- abuse in intimate personal relationships between teenagers
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
- sexual violence,¹ such as rape, assault by penetration and sexual assault; (this may include an online element which facilitates, threatens and/or encourages sexual violence)
- sexual harassment,² such as sexual comments, remarks, jokes and online sexual harassment, which may be stand-alone or part of a broader pattern of abuse
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- online sexual harassment including consensual and non-consensual sharing of nudes and semi nudes’ images and or videos (also known as sexting or youth produced sexual imagery), sexualised online bullying, unwanted sexual comments and messages, sexual exploitation, coercion and threats and coercing others into sharing images of themselves or performing acts they’re not comfortable with
- upskirting, which typically involves taking a picture under a person’s clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm; and
- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

This procedure focuses primarily on child-on-child abuse in the context of sexual harassment and sexual violence and should be viewed alongside other Group policies and procedures including:

- Student Disciplinary Policy and Procedure
- Student Code of Conduct
- Attendance Behaviour and Commitment to Study Procedures (ABC)

¹ For further information about sexual violence see Annex B

² For further information about sexual harassment see Annex B.

- Safeguarding Children and Adults at Risk Policy
- E-safety Policy
- Policy for Low Level Safeguarding Concerns
- Procedure for Dealing with Allegations against members of staff

It is compliant with the statutory guidance on child-on-child sexual violence and sexual harassment abuse as set out in Part 5 *Keeping Children Safe in Education (September 2022)* and should be read in conjunction with the Local Safeguarding Children Partnership (LSCP) Safeguarding Policy and Procedures, and any relevant Practice Guidance issued by it.

2. Aims

These procedures will:

- Set out the Group strategies for preventing, identifying and managing child- on-child abuse
- Take a contextual approach to safeguarding all students who are involved
- Acknowledge that children who have allegedly abused their peers or displayed harmful sexual behaviour are themselves vulnerable and may have been abused by peers, parents or adults in the community

3. Context

3.1. Understanding Child-on-child abuse

- Sexual violence and sexual harassment can occur between two children of any age and sex or a group of children sexually assaulting or sexually harassing a single child or group of children. The impact of this behaviour on children can be very distressing and have an impact on academic achievement and emotional health and wellbeing.
- Sexual harassment and sexual violence may occur online and offline (face to face physically and verbally).
- All behaviour takes place on a spectrum. Understanding where a child's behaviour falls on a spectrum is essential to being able to respond appropriately to it.
- The Group recognises the importance of distinguishing between problematic and abusive sexual behaviour (Harmful Sexual Behaviour HSB). The Group adopts the NSPCC definition of Harmful Sexual Behaviour SB as: "Sexual behaviours expressed by children, that are developmentally inappropriate, may be harmful towards self or others, or be abusive towards another child or adult." We will also use Simon Hackett's continuum model to demonstrate the range of sexual Behaviours (*Appendix 1*) and the Brook Traffic Lights (*Appendix 2*)

3.2 Vulnerable groups

The Group recognise that all children can be at risk however, we acknowledge that some groups are more vulnerable to abuse and may face additional barriers to telling someone because of their vulnerability.

This can include:

- experience of abuse within their family
- living with domestic violence
- young people in care
- children who go missing
- children with additional needs (SEN and/or disabilities)

- children who identify or are perceived as LGBT and/or have other protected characteristics under the Equalities Act 2010.

Girls are more frequently identified as being abused by their peers and girls are more likely to experience unwanted sexual touching in college, this is not confined to girls. Boys are less likely to report intimate relationship abuse and may display other behaviour such as antisocial behaviour.

4. Responding reports of sexual violence and sexual harassment

4.1 Incidences of child-on-child abuse will follow the Attendance Behaviour and Commitment to Study Procedures (ABC) where appropriate. Reports of sexual violence and harassment will be made on a case-by-case basis in consultation with the Designated Safeguarding Lead (or deputy), as appropriate to advise using their professional judgement and supported by other agencies such as social care or the police as required. In summary there are four ways to respond to an allegation:

1. Following the Attendance Behaviour and Commitment to Study Procedures (ABC)
2. Referral to Early help
3. Referral to local authority children's social care
4. Referral to the police

4.1.1 The immediate response to a reported incident

- The Group takes all reported incidents seriously and will reassure the victim that they will be supported and kept safe.
- Staff will not promise confidentiality as the concern will need to be shared further (for example, with the relevant safeguarding officer, Designated Safeguarding Lead or local authority children's social care). Staff will only share the report with those who are necessary to progress the case and care will be taken to protect the anonymity of any children involved in any report of sexual violence or sexual harassment.
- A written report using the individual college Safeguarding Reporting Form will be made as soon after the disclosure as possible, recording the facts as presented by the student. These may be used as part of a statutory assessment if the case is escalated later.
- Where the report includes an online element, the College will follow advice on searching, screening and confiscation. The staff will not view illegal images of a child unless unavoidable and only if another member of staff (preferably the DSL or deputy) is present. Illegal images will not be forwarded
- The DSL (or Deputy) will be informed as soon as possible.

4.1.2 Risk Assessment

When there has been a report of sexual violence, the Safeguarding Officer for the relevant college i.e. the college where the alleged victim is a student (in consultation with the Deputy or Designated Safeguarding Lead) will make an immediate risk and needs' assessment. Where there has been a report of sexual harassment, the need for a risk assessment should be considered on a case-by-case basis. The risk and needs' assessment should consider:

- the victim, especially their protection and support
- whether there may have been other victims
- the alleged perpetrator; and

- all the other children (and, if appropriate, adult students and staff) at the college, especially any actions that are appropriate to protect them.

Risk assessments will be recorded in the safeguarding files and be kept under review. The relevant Safeguarding Officer (in consultation with the Deputy or Designated Safeguarding Lead) will ensure they are engaging with local authority children's social care

4.1.3 Action following a report of sexual violence and/or sexual harassment

Following an incident, the following will be considered:

- the wishes of the victim in terms of how they want to proceed. This is especially important in the context of sexual violence and sexual harassment;
- the nature of the alleged incident(s), including: whether a crime may have been committed and/or harmful sexual behaviour has been displayed
- the ages of the children involved
- the developmental stages of the children involved
- any power imbalance between the children. For example, is the alleged perpetrator significantly older, more mature or more confident? Does the victim have a disability or learning difficulty?
- if the alleged incident is a one-off or a sustained pattern of abuse
- are there ongoing risks to the victim, other children, adult students or college staff?
- other related issues and wider context, including links to child sexual exploitation and child criminal exploitation

4.1.4 Follow up Actions

Children sharing a classroom:

While the Group establishes the facts of the case and starts the process of liaising with children's social care and the police:

- In alleged cases of rape, assault by penetration or sexual assault, the alleged perpetrator will be suspended pending a disciplinary investigation as per the Attendance Behaviour and Commitment to Study Procedures (ABC) and removed from any classes they share with the victim.
- In cases of sexual harassment, we will consider how best to keep the victim and alleged perpetrator a reasonable distance apart on college premises and on transport to and from the College.
- Support will be provided by the relevant college for both the alleged perpetrator and victim

These actions are in the best interests of both children and should not be perceived to be a judgment on the guilt of the alleged perpetrator.

4.1.5. Options to manage the report

1. Manage internally

In some cases of sexual harassment, for example, one-off incidents, where the children concerned are not in need of early help or statutory intervention it may be appropriate to handle the incident internally, perhaps through utilising the ABC/ Student

Disciplinary policies and by providing pastoral support from the Pastoral Tutor working with the Student Support Team.

This decision will be made based on the principle that sexual violence and sexual harassment is never acceptable and will not be tolerated. All decisions, and discussions around making these decisions will be recorded and stored by the relevant Safeguarding Officer and recorded in the safeguarding files.

a. Early Help

In line with 1 above, the group may decide that the children involved do not require statutory interventions but may benefit from early help. Early help means providing support as soon as a problem emerges, at any point in a child's life. Providing early help is more effective in promoting the welfare of children than reacting later. Early help can be particularly useful to address nonviolent harmful sexual behaviour and may prevent escalation of sexual violence.

b. Referrals to local authority children's social care

Where a child has been harmed, is at risk of harm, or is in immediate danger, we will make a referral to the MASH / SPA following locally agreed protocols.

Where statutory assessments are appropriate, the relevant safeguarding officer will work alongside and cooperating with, the relevant lead social worker (in consultation with the DSL or Deputy). Collaborative working will help ensure the best possible package of coordinated support is implemented for the victim and where appropriate, the alleged perpetrator and any other children that require support.

c. Reporting to the Police and criminal investigations

Where a report of rape, assault by penetration or sexual assault is made, this will be reported to the police. Any report to the police will generally be made through the MASH/SPA as above. The safeguarding officer for the relevant college will follow local processes for referrals.

Where a report has been made to the police, the college will consult the police and agree what information can be disclosed to staff and others, the alleged perpetrator and their parents or carers. They will also discuss the best way to protect the victim and their anonymity.

Where there is a criminal investigation, we will work closely with the relevant agencies to support all children involved (especially potential witnesses). Where required, advice from the police will be sought in order to help us.

Whilst protecting children and/or taking any disciplinary measures against the alleged perpetrator, we will work closely with the police (and other agencies as required), to ensure any actions the Group takes do not jeopardise the police investigation.

4.1.6 The end of the criminal process

Once a criminal process has concluded, the Group will take appropriate action depending on the outcome of the process and in accordance with relevant Group policies:

- If a child is convicted or receives a caution for a sexual offence, the relevant college will update its risk assessment, ensure relevant protections are in place for all children. We will consider any suitable action following our behaviour policy.
- Where a criminal investigation into a rape or assault by penetration leads to a conviction or caution, we will take suitable action, if we have not already done so. In all but the most exceptional of circumstances, the rape or assault by penetration is likely to constitute a serious breach of the Group's Student Code of Conduct and lead to the view that allowing the perpetrator to remain in college would seriously harm the education or welfare of the victim (and potentially other students).
- Where a criminal investigation into sexual assault leads to a conviction or caution, we may, if we have not already done so, consider any suitable sanctions as set out in the Student Disciplinary Policy and Criminal Convictions Policy including consideration of permanent exclusion.
- If the perpetrator remains in college, we will be very clear as to our expectations regarding the perpetrator now they have been convicted or cautioned. This could include expectations regarding their behaviour and any restrictions we think are reasonable and proportionate about the perpetrator's timetable.
- Where cases are classified as "no further action" (NFA'd) by the police or Crown Prosecution Service, or where there is a not guilty verdict, we will continue to offer support to the victim and the alleged perpetrator for as long as is necessary. A not guilty verdict or a decision not to progress with their case will likely be traumatic for the victim. The fact that an allegation cannot be substantiated does not necessarily mean that it was unfounded. We will continue to support all parties in this instance.
- Where the alleged perpetrator is going to remain at the College, the principle would be to continue keeping the victim and perpetrator in separate classes and continue to consider the most appropriate way to manage potential contact on college premises and transport.

4.1.6 Unsubstantiated, unfounded, false or malicious reports

- 4.2.1 If a report is determined to be unsubstantiated, unfounded, false or malicious, the designated safeguarding lead (or deputy) will consider whether the child and/or the person has made the allegation is in need of help or may have been abused by someone else and this is a cry for help. In these circumstances a referral to local authority children's social care may be made.
- 4.2.2 If a report is found to be deliberately invented or malicious, the Group will decide whether disciplinary action is appropriate.

4.3 Ongoing Support for Children Affected by Sexual-Harassment and sexual Violence

- 4.3.1 Support for victims of sexual assault is available from a variety of agencies.

- 4.3.2 The College will support the victim of sexual assault to remain in college, but if they are unable to do so the College will support the victim to continue their education elsewhere. This decision will be made only at the request of the child and their family. If the victim chooses to move the College will work to ensure that the new College or training provider are aware of any ongoing support they may need. The College will support this move.

Where there is a criminal investigation and the alleged perpetrator remains in, the College will be removed from any shared classes with the victim and we will also consider how best to keep them a reasonable distance apart on the College premises or on college transport. This is in the best interest of the children concerned and should not be perceived to be a judgement of guilt before any legal proceedings.

5. Physical Abuse and Serious Violence

- 5.1 While a clear focus of these child-on-child abuse procedures is around sexual harassment and sexual violence, physical assaults, initiation violence/rituals from student to student can also be abusive.

- 5.2 Some students may also be at risk from or are involved with serious violent crime. All staff should be aware of indicators, which may signal that learners 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.

- 5.3 Child-on-child physical abuse and serious violence will not be tolerated and if it is believed that a crime has been committed, will be reported to the police.
- 5.4 The Student Disciplinary Policy and Procedure will be applied in these cases, with recognition that any police investigation take priority.
- 5.5 When dealing with other alleged behaviour which involves reports of, for example, emotional and/or physical abuse, staff can draw on aspects of Hackett's continuum (Appendix 1) to assess where the alleged behaviour falls on a spectrum and to decide how to respond. This could include, for example, whether it:
- is socially acceptable
 - involves a single incident or has occurred over a period of time
 - is socially acceptable within the peer group
 - is problematic and concerning
 - involves any overt elements of victimisation or discrimination e.g. related to race, gender, sexual orientation, physical, emotional, or intellectual vulnerability

- involves an element of coercion or pre-planning
- involves a power imbalance between the child/children allegedly responsible for the behaviour
- involves a misuse of power

6. Online Behaviour

- 6.1 Many forms of child-on-child abuse have an element of online behaviour which can take the form of abusive, harassing and misogynistic messages, the non-consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography, to those who do not want to receive such content.
- 6.2 All staff should be aware that technology is a significant element for many safeguarding and wellbeing issues – notably child-on-child abuse.
- 6.3 Given the high frequency sharing of nude and semi-nude images – students who engage in consensual image sharing of nudes and semi-nude images and videos – especially between older students need to understand that it is illegal and could be reported to the Police as well as being regarded as a disciplinary matter as set out in the Student Code of Conduct and the Student Disciplinary Policy and Procedure.

7. Prevention

- 7.1 STCG, actively seeks to raise awareness of and prevent all forms of child-on-child abuse by educating all Governors, Senior Leadership Team, staff and volunteers, students and parents /carers about this issue. This will include training all Governors, Senior Leadership Team, staff and volunteers on the nature, prevalence and effect of child-on-child abuse, and how to prevent, identify and respond to it.

This includes:

- Contextual Safeguarding
- The identification and classification of specific behaviours and
- The importance of taking seriously all forms of peer-on-peer abuse (no matter how low level they may appear) and ensuring that no form of child-on-child abuse is ever dismissed.

8. Working with students

- 8.1 In order to prevent and protect students from child-on-child abuse, the Group will:
- Inform students about the nature and prevalence of child on child abuse via tutorials and the wider curriculum
 - Provide numerous opportunities for students to be heard and understood on this matter
 - Ensure students know what to do if they witness or experience such abuse, the effect that it can have on those who experience it and the possible reasons for it, including vulnerability of those who inflict such abuse.
 - Ensure students understand the zero-tolerance policy towards all forms of child-on-child abuse and its implications
 - Support both alleged perpetrators and victims of sexual harassment and abuse as outlined above

- Create culture in which our students feel able to share their concerns openly, in a non-judgmental environment, and have them listened to

9. Multi-agency working

- 9.1 The Group actively engages with its local partners in relation to child-on-child abuse, and works closely with, Local Safeguarding Children’s Partnerships, Safeguarding Hub (SPA/MASH), children's social care, and/or other relevant agencies, and other Colleges.
- 9.2 The relationships the Group has built with these partners are essential to ensuring that the Group is able to prevent, identify early and appropriately handle cases of peer-on-peer abuse.

They help the College to:

- (a) To develop a good awareness and understanding of the different referral pathways that operate in its local area, as well as the preventative and support services which exist
- (b) ensure that our students can access the range of services and support they need quickly
- (c) support and help inform our local community's response to child-on-child abuse
- (d) increase our awareness and understanding of any concerning trends and emerging risks in our local area to enable us to take preventative action to minimise the risk of these being experienced by our students.

- 9.3 The College actively refers concerns/allegations of child-on-child abuse where necessary to the relevant MASH, children's social care, and/or other relevant agencies. Children resident out of county but attending STCG will be reported to their home MASH or equivalent Social Care. In cases involving children who are subject to risk, harm and abuse and who have CLA status, the children’s social worker will be informed and a coordinated approach to address any incidents or concerns will be required.

Appendix 1 Simon Hackett (2010) has proposed a continuum model to demonstrate the range of sexual behaviours presented by children and young people, from those that are normal, to those that are highly deviant:

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

Appendix 2

Sexual Behaviours Traffic Light Tool – Book