South Thames Colleges Group

Carshalton College | Kingston College | Merton College | South Thames College

SAFEGUARDING CHILDREN AND ADULTS AT RISK POLICY 2023-24

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1 Introduction

1.1. South Thames Colleges Group is committed to a whole Group approach to safeguarding, creating a culture of vigilance and promoting the welfare of children, young people 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. All welfare concerns are taken seriously and students are encouraged to talk to us about anything that worries them. 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 2023).

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 2023
- Working Together to Safeguard Children 2023
- The Prevent Duty Guidance 2023: for England and Wales
- 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 / guidance – notably:

- STCG Values, Our Code of Conduct and the Attendance, Behaviour and Commitment to

Study (ABC) Guidance
- Child-on-child abuse Procedures (see Appendix 4)
- Complaints, Compliments and Feedback Policy
- E-Safety Policy
- Fitness to Study Policy
- Freedom of Speech & Visiting Speaker Policy
- Inclusion and Learning Support Policy
- Children Looked After and Care Leavers Policy
- Applicant and Student Criminal Conviction Policy & Procedure
- Student Code of Conduct
- Student Disciplinary Policy and Procedure
- Policy for Low Level Safeguarding Concerns
- Prevent Action Plan
- Safeguarding Concerns and Allegations made about Staff including Supply Teachers, Volunteers, Contractors
- Safer Recruitment Policy
- Safeguarding and External Contractor's Procedures.
- Whistleblowing Policy

STCG Policies and Procedures:

- View on Website: Link
- View on STCG (staff) online: Link

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 be familiar with the statutory guidance 'Keeping Children Safe in Education' 2023 Part One/Annex B, read and record that it has been understood 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.londoncp.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 2023 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

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 susceptibility 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".

When operating this policy South Thames College uses the following accepted governmental definitions of extremism and radicalisation which are:

Extremism: 'Vocal or active opposition to fundamental British Values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs; and/or calls for the death of members of our armed forces, whether in this country or overseas'.

Radicalisation: 'the process by which a person comes to support terrorism and forms of extremism leading to terrorism'.

3.4 Safeguarding and promoting the welfare of young people is a broader term than child protection. It includes protecting young people from maltreatment, preventing impairment of mental and physical health or development and ensures young people can grow up in safe circumstances. It 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' 2023 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:

4.2 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.

4.3 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. See section 10.

4.4 Ensure the Designated Safeguarding Lead and Deputy Safeguarding Leads and Safeguarding Officers undergo appropriate training every two years and in addition to this training, their knowledge and skills will be refreshed at least annually.

4.5 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.

4.6 Preventing extremism and radicalisation. As part of wider safeguarding responsibilities, college staff are alert to:

- Disclosures by students of their exposure to the extremist actions, views or materials of others outside of college, such as in their homes or community groups, especially where students have not actively sought these out.
- Graffiti symbols, writing or artwork promoting extremist messages or images.
- Students accessing extremist material online, including through social networking sites.
- Parent/carer reports of changes in behaviour, friendship or actions and requests for assistance.
- Local authority services, and police reports of issues affecting students in other colleges or settings.
- Students voicing opinions drawn from extremist ideologies and narratives and glorifying violence, especially to other faiths and cultures.
- Use of extremist or ''hate" terms to exclude others or incite violence.
- Intolerance of difference, whether secular or religious or views based on, but not exclusive to, gender, disability, homophobia, race, colour or culture.
- Attempts to impose extremist views or practices on others.
- Making remarks about being at extremist events or rallies outside college.

4.7 Establish and maintain a safe environment in which staff and students feel secure and are encouraged to talk freely about anything that concerns them.

4.8 Include opportunities in the Tutorial Programme and curriculum to promote British Values, reflect on appropriate behaviour e.g. consent and develop and equip students with the knowledge and skills needed to recognise risks and stay safe from abuse (including online).

4.9 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.

4.10 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.

4.11 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.

4.12 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:

4.13 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.

4.14 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.

4.15 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)

Reporting Form: Link

Contact:

- Kingston College: mailto:Referral.team@stcg.ac.uk/ 0208 268 2969/2949
- Carshalton / Merton: ccstudent.support@stcg.ac.uk
- South Thames College: safeguarding.whs@stcg.ac.uk

4.16 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. However, the Group recognises that sometimes children / young people / Adults at Risk do 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. This should not prevent staff from having a professional curiosity and reporting any concern.

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

4.18 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.

4.19 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.

4.20 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.

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

4.22 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.

4.23 Acknowledging that a child that is looked after (CLA - Child that is Looked After) or has been previously looked after by the Local Authority potentially remains vulnerable and all staff should have the skills, knowledge and understanding to ensure that CLA and children who were previously looked after are kept safe. Our setting will ensure that all agencies will work together, and prompt action will be taken in response to any safeguarding concerns, especially for children, who are a particularly vulnerable group;

4.24 Ensuring that sanctions applied due to behaviour incidents involving children with special educational needs and disabilities (SEND), are appropriate and the additional vulnerability of the group is considered. See guidance: Reducing the Need for Restraint and Restrictive Intervention – June 2019

4.25 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. Link

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 Centre Leads (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 2023, the Corporation (Governing Body) will:

5.3 Select a Governor to take leadership responsibility within the Corporation for the organisation's safeguarding arrangements.

5.4 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.

5.5 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.

5.6 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

5.7 Assure itself that the Group fulfils its obligations under legislation and statutory guidance (KCSIE 2023) 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

5.8 Responsibilities of the Group Principal/CEO

The CEO will:

5.9 Ensure the Group's Policy for Safeguarding children and vulnerable adults and other related Group 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.

5.10 Delegate operational management responsibility and implementation of procedures to a Senior Postholder and a Designated Safeguarding Lead.

5.11 Receive immediate notification of any changes affecting the policy or procedures and ensure the policy is reviewed and amended as appropriate.

5.12 Ensure staff are familiar with this Policy and Procedure, and specifically have signed to say they have read and understood KCSiE 2023 Part One, Annex B.

5.13 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.

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

The Senior Post-Holder will:

5.15 Have overall management responsibility for Safeguarding across the Group and act as line Manager for the Designated Safeguarding Lead.

5.16 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.

5.17 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.

5.18 Responsibilities of the College Principal

The College Principal will:

5.19 Ensure the Group's Policy for Safeguarding Children and Adults at Risk, KCSiE 2023 and associated College procedures are implemented in their College.

5.20 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.

5.21 Ensure staff are able to access and undertake safeguarding training and understand and fulfil their safeguarding roles and responsibilities.

5.22 Establish and maintain a safe environment in which staff and students feel secure and are encouraged to talk freely about anything that concerns them.

5.23 Ensure that staff understand the importance of having a professional curiosity and reporting any concern they may have about a child / young person or vulnerable adult immediately.

5.24 Ensure safeguarding practices are embedded within curriculum design and delivery and that students are taught how to keep themselves safe (including online).

5.25 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.

5.26 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:

5.27 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 be updated at least every two years.

5.28 Understand the importance of information sharing and the requirements of data protection legislation and regulations.

5.29 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.

5.30 Work with College Principals and the Director of Human Resources to deal with allegations against members of staff, agency staff, contractors and volunteers.

5.31 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.

5.32 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.

5.33 Alongside Centre leads act as a contact person within the Group for external safeguarding partners and work with Centre Leads to provide advice and support to all staff where required (including temporary, supply staff and volunteers and members of the Governing Body) on safeguarding matters.

5.34 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 might on their attendance, engagement and achievement.

5.35 Work with College Principals/Vice Principals to encourage a culture of listening to students when putting in place any measures to protect them.

5.36 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.

5.37 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.

5.38 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.

5.39 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.

5.40 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).

5.41 Work with the Director of IT Services and nominated staff to ensure that the College's filtering and monitoring systems are functional and effective.

5.42 Work with the Centre leads (Deputy Designated Safeguarding Leads) to ensure that child protection/safeguarding records are secure, kept up to date and maintained and transferred (where necessary) as required under KCSiE 2023.

5.43 Responsibilities of the Deputy Designated Safeguarding Leads (referred to as the Centre Lead in the Group Reporting Structure (page 25).

The DDSLs will:

5.44 Be trained to the same standard as the DSL and the DDSL role will be explicit within their job description.

5.45 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.

5.46 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.

5.47 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.

5.48 Advise and support safeguarding officers in an individual college, providing guidance on cases as appropriate.

5.49 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.

5.50 Work with Curriculum Managers to encourage a culture of listening to students when putting in place any measures to protect them.

5.51 Oversee all safeguarding cases within a particular College, liaising with social workers, local authorities and other agencies. Act as a contact person for the relevant college to external safeguarding partners.

5.52 Ensure detailed, accurate, secure written records of safeguarding concerns and referrals are recorded on CPOMS.

5.53 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.

5.54 Make referrals to external agencies as appropriate.

5.55 Attend or work with pan-London or local safeguarding partners (previously boards) as appropriate.

5.56 Responsibilities of College Vice Principals

5.57 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.

5.58 Foster a listening culture for students.

5.59 Work with the DSL and Deputy DSL to coordinate action if required where a child or adult is at risk.

5.60 Work with DSL and Deputy DSL and where appropriate local Safeguarding partners to protect and promote the welfare of children and adults at risk.

5.61 Ensure students are aware of issues around safeguarding and Prevent, know who to talk to if they are concerned, that British values are effectively promoted and that the tutorial programme develops and equip students with the knowledge and skills needed to recognise risk and stay safe from abuse.

5.62 Work with the College Principal to ensure cover/out of hours arrangements are in place to enable staff to access safeguarding advice.

5.63 Responsibilities of College Heads of School

The Head of School will:

5.64 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 might on their attendance, engagement and achievement.

- Ensure students are aware of issues around safeguarding and Prevent, know who to talk to if they are concerned, that British values are effectively promoted and that the tutorial programme develops and equip students with the knowledge and skills needed to recognise risk and stay safe from abuse.

- 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.

- Ensure all staff understand the importance of having a professional curiosity and reporting any concern they may have about a child / young person or vulnerable adult immediately.

5.65 Ensure safeguarding practices are embedded within curriculum design and delivery including team meetings, progress reviews and CPD arrangements.

5.66 Responsibilities of Safeguarding Officers

The Safeguarding Officers will:

5.67 Fulfil responsibilities of all staff as set out in KCSIE 2023 (Part 1 & Annex B).

5.68 Receive reports/records of safeguarding concerns and record safeguarding concerns on CPOMS.

5.69 Assess concerns and take appropriate action in liaison with key parties as follows:

- Report serious/complex cases to the DDSL (centre lead) /DSL
- 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

5.70 Undertake relevant safeguarding training as directed by the Centre Lead (Deputy DSL) / DSL.

5.71 Cascade important safeguarding updates to department/colleagues.

5.72 Champion and promote key safeguarding issues across the College.

5.73 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:

5.74 Provide a safe environment in which children can learn and challenge any inappropriate behaviour.

5.75 Be prepared to identify children who may benefit from early help and be aware of their local early help process. Early help means providing support as soon as a problem emerges.

5.76 Understand the difference between a safeguarding concern and a student in immediate danger or risk of harm. Be familiar with how to report a safeguarding concern, and any staff member who has a concern about a child's welfare should follow the Group's reporting processes. If unsure contact the DSL/DDSL/Safeguarding Team.

5.77 Undertake initial safeguarding training followed by regular updates.

5.78 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.

5.79 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 (Appendix 4)

5.80 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.

5.81 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.

5.82 Be aware that a students poor behaviour may be a sign that they are suffering harm or that they have been traumatised by abuse.

5.83 Be professionally curious and report any concern about a child / young person or vulnerable adult immediately.

5.84 Understand that students who have a social worker may be educationally disadvantaged and face barriers to attendance, learning, behaviour and positive mental health.

5.85 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.

5.86 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.

5.87 Refer any concerns they may have about any member of staff in relation to the safeguarding of a child or adult at risk (see section 7).

5.88 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. When a child is absent for prolonged periods and or/ repeated occasions or their whereabouts is unknown.

6.1 All students under 18 or who are an Adult at Risk who are absent for prolonged periods or their whereabouts are unknown will be considered a safeguarding incident. If the student is deemed to be at immediate risk the safeguarding team at the College attended by the student concerned will undertake checks with the family/authorities to ensure the case has been reported to the Police. Any relevant information that might help to find or support the child will be shared. If the student is a Looked After Child, a Care Leaver or an Unaccompanied Young Person the college will immediately contact police and social services. If a child or Adult at Risk with a recorded safeguarding incident is absent from the college on repeated occasions the Safeguarding Team will undertake appropriate checks with the family/authorities. If any child or Adult at Risk is absent from the college on repeated occasions and there is a safeguarding concern it must be referred immediately to the Safeguarding Team by the teacher/tutor/member of staff.

7. Allegations or Low-level concerns about an adult working in the Group whether as a tutor, agency staff, support staff, other staff, volunteers or contractors

7.1 At STCG we recognise the possibility that adults working in the Group may harm children and young people, including governors, volunteers, temp staff and contractors. Allegations or concerns may come from various sources, for example, a suspicion; complaint; or disclosure made by a young person, parent or other adult within or outside of the organisation; or as a result of vetting checks undertaken.

7.2 The term 'low-level' concern does not mean that it is insignificant. A low-level safeguarding concern is a concern raised, no matter how small, that an adult may have acted in a manner that appears to be below the threshold that would lead to a formal safeguarding allegation but is inconsistent with the expected standards of behaviour, even if not linked to a particular act or omission, to create an unease as to the adult's behaviour particularly towards or around children. A 'low-level' concern is any concern that an adult working in or on behalf of the Group may have acted in a way that:

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

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

- being over friendly with children, including being friends on social media
- having favourites
- taking photographs of children on their mobile phone, contrary to College policy
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door, or meeting a young person outside of the college setting for non-college reasons or
- humiliating children.

7.3 If any staff has any concerns about a member of staff or a volunteer staff, agency staff, contractors inform one of the following: DSL, DDSL, College Principal or DCEO as soon as reasonably possible and, in any event, within 24 hours of becoming aware of it if the concern relates to a particular incident. If the low-level safeguarding concern has not been reported directly to the DSL, DDSL, College Principal or DCEO, the recipient of the concern will discuss the content with one of the aforementioned post holders as soon as possible and in any event within 24 hours of becoming aware of it. The College Principal or DCEO will, in the first instance, determine that it is a low-level safeguarding concern and should not be reclassified as an allegation and dealt with under the appropriate procedure. The circumstances in which a low-level safeguarding concern might be reclassified as an allegation are where:

- the threshold is met for an allegation
- there is a pattern of low-level concerns which collectively amount to an allegation
- there is other information which when considered leads to an allegation

Where the College Principal or DCEO is in any doubt whatsoever, advice will be sought from the Designated Officer (formerly LADO), if necessary, on a no-names basis.

7.4 Having established that the safeguarding concern is low-level, the College Principal or DCEO (or nominated deputy) will collect as much evidence as possible by speaking:

- directly to the person who raised the concern, unless it has been raised anonymously, and
- to the individual involved and any witnesses.

7.5 Records will be kept by HR and must be kept confidential and comply with Data Protection Act 2018. Records will be reviewed regularly and any patterns of concerning, problematic or inappropriate behaviour identified.

The Low-Level Safeguarding Concerns Policy: Link.

7.6 If a member of staff receives an allegation against another member of staff, or if they themselves have concerns about the behaviour of another member of staff they must report the allegations immediately to the College Principal. Allegations should initially be discussed between the College Principal (the 'case manager') and Designated Safeguarding Lead (DSL) and the relevant Designated Officer (formerly LADO). HR will also support and provide advice during the initial consideration of any allegations. HR may also be instructed by the case manager to liaise with the Designated Officer. In the absence of the College Principal or in cases where the College Principal is the subject of the accusation or concern, the allegations should be reported to the Group Principal/CEO.

7.7 In the event of allegations against the Group Principal/CEO these should be reported to the Clerk to the Corporation who will make arrangements for the allegations to be reported to the Chair of Governors. In the event of the need for the involvement of the Group Principal/CEO or the Chair of Governors, they will be required to undertake the actions defined for the case manager. If an allegation is made against a governor, the Group will follow the relevant local procedure. Where an allegation is substantiated, the procedures for removing the governor from office will be followed.

7.8 An allegation is any information which indicates that a member of staff/volunteer may have:

- Behaved in a way that has, or may have harmed a child/young person
- Possibly committed a criminal offence against/related to a child/young person
- Behaved towards a child or children/young person or people in a way which indicates she/he would pose a risk of harm to children; and/or
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children (also includes behaviour outside the college).

Safeguarding Concerns and Allegations made about Staff including Supply Teachers, Volunteers, Contractors: Link

8 Whistleblowing

8.1 As stated in KCSiE 2023, '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.'

8.2 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.

8.3 In the event of a staff member feeling unable to raise an issue with their employer or feels that their genuine concerns are not being addressed, allegations should be reported directly to the Designated Officer (formerly LADO). Staff may consider discussing any concerns with the DSL and if appropriate make any referral via them.

8.4 Where a staff member feels unable to raise an issue with their employer/through the whistle blowing procedure or feels that their genuine concerns are not being addressed, other whistleblowing channels may be open to them: Multi-Agency Safeguarding Hub: 0300 126 7000 NSPCC whistleblowing helpline is available for staff who do not feel able to raise concerns regarding child protection failures internally. 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

General advice can be found at: www.gov.uk/whistleblowing
Whistleblowing Policy: Link

9. Safer Working Practice

9.1 To reduce the risk of allegations, all staff should be aware of safer working practice and should be familiar with the guidance contained in the staff code of conduct and Safer Recruitment Consortium document - Guidance for safer working practice for those working with children and young people in education settings (2022).

9.2 The document seeks to ensure that the responsibilities of college leaders towards young people and staff are discharged by raising awareness of illegal, unsafe, unprofessional and unwise behaviour. This includes guidelines for staff on positive behaviour management in line with the ban on corporal

punishment (School Standards and Framework Act 1998). Please see the Staff Code of Conduct policy for more information.

9.3 We will ensure that agencies and third parties supplying staff provide us evidence that they have made the appropriate level of safeguarding checks on individuals working in our school. The single central record must cover the following people: all staff, including teacher trainees on salaried routes, agency and third-party and supply staff who work at the school and Governors.

9.4 Every job description, person specification, and job advertisement will have a clear statement about the safeguarding responsibilities of the post holder. In line with guidance included within Keeping Children Safe in Education 2023 and reflecting good safer recruitment practice the College will consider carrying out an online search on shortlisted candidates to help identify any issues that are publicly available online.

9.5 We will ensure that at least one member of every interview panel has completed safer recruitment training within the last 3 years and that those members of staff who are safer recruitment trained refresh their knowledge every one to three years.

Safer Recruitment Policy: Link

10 Staff Induction, Training and Development

10.1 All new members of staff, including newly-qualified teachers and teaching assistants, will be given induction that includes basic safeguarding training on how to recognise signs of abuse, how to respond to any concerns, online safety (including their roles and responsibilities around filtering and monitoring systems within our setting) and familiarisation with the safeguarding policy, staff code of conduct, Keeping Children Safe in Education: Statutory Guidance for Schools and Colleges and other related policies. There are mechanisms in place, such as safeguarding updates, to assist staff to understand and discharge their role and responsibilities as set out in Part one of Keeping Children Safe in Education. Staff should also read, "Working Together to Safeguard Children." July 2018. Staff are advised to maintain and attitude if 'it could happen here' where safeguarding is concerned.

10.2 The training provided at induction will be proportionate to staff members' and governors' roles and responsibilities.

10.3 All Designated Safeguarding Leads (DSLs) will undergo updated DSL safeguarding training every two years. DSLs should undertake Prevent awareness training and disseminate an understanding of the Prevent Duty through the annual training programme delivered to staff each academic year. All safeguarding officers will receive dedicated and appropriate safeguarding training.

10.4 All staff members of the college receive appropriate training including a requirement to complete on-line CPD and attend relevant SG briefings / training during the academic year. The training will include the following aspects: Staff understand the difference between a safeguarding concern and a student in immediate danger or at risk of significant harm. When concerned about the welfare of a student, staff should always act in the best interests of the young person. Staff are advised to maintain an attitude of 'it could happen here' where safeguarding is concerned. Staff know how

best to respond to a student who makes a disclosure of abuse or harm and if unsure always refer it to the DSL/DDSL /Safeguarding team. If staff have any concerns about a student's welfare, they should act on them immediately. In addition there will be 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 and be alert to the fact 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.

10.5 The nominated governor for safeguarding will undergo training prior to or soon after appointment to the role; this training will be updated every three years. All governors undergo specific awareness training to equip with them with the knowledge to provide strategic challenge , to ensure safeguarding policies/procedures are effective and deliver a robust whole-college approach to safeguarding as set out in KCSiE 2023.

10.6 We will ensure that staff members provided by other agencies and third parties, e.g. supply teachers and contractors, have received appropriate safeguarding training commensurate with their roles before starting work. They will be given the opportunity to take part in whole-school training if it takes place during their period of work for the college.

11 Records and monitoring

11.1 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:

11.2 All staff are aware of the need to report and record any concerns.

11.3 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.

11.4 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 2023

11.5 Safeguarding records are secure and separate from other student records.

11.6 If a young person for whom the Group has, or has had, safeguarding concerns moves to another education establishment where known, the safeguarding team will endeavour to pass their child protection file promptly and securely, and separately from the main learner file. In addition, if the concerns are significant or complex, and/or social services are involved, the safeguarding team will contact the DSL of the receiving school and offer information to enable them to have time to make any necessary preparations to ensure the safety of the young person.

11.7 The safeguarding team will contact the previous education establishment if a safeguarding concern becomes known and the college does not have a SG file from the previous provider.

11.8 Child Protection files are kept and transferred in line with requirements set out in KCSIE 2023.

12 Confidentiality and Information Sharing

12.1 Information sharing is vital in identifying and tackling all forms of abuse and neglect. GDPR does not prevent, or limit, the sharing of information for the purposes of keeping children safe. Lawful and secure information sharing between schools/colleges, Children's Social Care, and other local agencies, is essential for keeping children safe and ensuring they get the support they need. Where there is significant risk of harm (section 47) relevant information will be shared with or without the consent of the subject.

12.2 The Data Protection Act 2018 introduced 'safeguarding' as a reason to be able to process sensitive, personal information, even without consent (DPA, Part 2,18; Schedule 8, 4)

12.3 When the safeguarding team is considering whether, or not, to share safeguarding information (especially with other agencies) STCG will record who they are sharing that information with and for what reason. If we have taken a decision not to seek consent from the data subject and/or parent/carer that should also be recorded within CPOMs.

12.4 All relevant information can be shared without consent if to gain consent would place a child at risk.

12.5 Fears about sharing information must not be allowed to stand in the way of promoting the welfare and protecting the safety of children/young people. As with all data sharing, appropriate organisational and technical safeguards should still be in place.

12.6 Safeguarding young people raises issues of confidentiality that must be clearly understood by all staff/volunteers in colleges.

12.7 Staff should never promise that they will not tell anyone about an allegation, as this may not be in the young person's best interests.

12.8 Staff/volunteers who receive information about young people and their families.
in the course of their work should share that information only within appropriate professional contexts.

12.9 Timely information sharing is essential to effective safeguarding.

12.10 Information must only be shared on a 'need-to-know' basis, but you do not need consent to share information if a child/young person is suffering, or at risk of, serious harm.

13 Communication with Parents/Carers

13.1 STCG will ensure the Safeguarding Policy is available publicly via the Group website.

13.2 Where appropriate, we will discuss any concerns about a child/young person with their parents. The safeguarding team will normally do this in the event of a suspicion or disclosure.

13.4 If we believe that notifying the parents would increase the risk to the child, we will discuss this with the local authority children's social care before doing so.

13.5 In the case of allegations of abuse made against other young people, we will normally notify the parents of all the young people involved.

14 Contractors, Service and Activity Providers, Visitors

14.1 We will ensure that contractors and providers are aware of our school's safeguarding policy and procedures. We will require that employees and volunteers provided by these organisations use our procedure to report concerns. The Safeguarding and External Contractors Procedure Link.

We will seek assurance that employees and volunteers provided by these organisations and working with our children have been subjected to the appropriate level of safeguarding checks in line with *Keeping Children Safe in Education: Statutory Guidance for Schools and Colleges, 2023.*

14.2 We will check the identity of all visitors and volunteers coming into College. Visitors are expected to sign in and out in the office visitors' log and to display a visitor's badge while on the college site. Any individual who is not known or identifiable will be challenged for clarification and reassurance.

14.3 South Thames College values the opportunities presented by external speakers. The Group will not accept the use of language by external speakers that offends and is considered to be intolerant. Specifically, this means 'street', misogynistic, sexual or racist language irrespective of context. Direct attacks in any religions or beliefs are not permitted. The Group will not tolerate any person who intentionally demeans individuals and groups defined by their ethnicity, race, religion and/or belief, sexuality, gender, disability, age or lawful working practices and which give rise to an environment in which people experience fear, harassment, intimidation or violence.

Freedom of Speech and Visiting Speaker Policy: Link

14.4 The Group will not accept the behaviour of any individual, parent or anyone else, that threatens security or leads others, child, or adult, to feel unsafe. Such behaviour will be treated as a serious concern and may result in a decision to refuse the person access to the college sites.

15. Work based learning

15.1 All students on work-based learning programmes receive an induction, which includes raising awareness of the Group's commitment towards safeguarding including preventing extremism and radicalisation, details of the support services offered and contact details for the safeguarding team.

15.2 The understanding of all aspects of safeguarding, preventing extremism and radicalisation and safe working practices is checked and the opportunity to discuss any issues is given. Assessments are made to ensure that the student's wellbeing is safeguarded by the work placement assessors.

15.3 The Group has arrangements in place to ensure that, prior to work- based learning commencing:

- Pre-placement health and safety checks of employers' premises and health and safety management arrangements are complete, including insurance details
- Employers are made aware of relevant Group policies
- The requirements for DBS checks are assessed and the relevant processes undertaken where required

16. Work experience

16.1 All work placement providers will be given safeguarding information at the time of placement. The Group has arrangements in place to ensure that, prior to work experience:

- Pre-placement health and safety checks of employers' premises and health and safety management arrangements are complete, including insurance details;
- Employers are made aware of relevant Group policies;
- The requirements for DBS checks are assessed and the relevant processes undertaken where required.

17. Organisations of Individuals Using College Premises

17.1 We will ensure that when our premises are used by organisations or individuals outside of the college day that all reasonable steps are taken, as required by law, to ensure the safety of the children and to protect them from harm. We will ensure that providers, their staff, and volunteers have a duty of care toward the children who attend. The guidance on Keeping children safe in out-of-school settings – April 2022 details the safeguarding arrangements that schools and colleges should expect these providers to have in place.

17.2 We will follow our safeguarding policies and procedures, as with any safeguarding allegation, including informing the LADO, if we receive an allegation relating to an incident that has happened when an individual or organisation has used our college premises for the purposes of running activities for children. This will cover any community group, sports associations, or service provider that runs extra-curricular activities on any of our college sites.

18. Online Safety

18.1 We ensure that we have effective mechanisms to identify, intervene in, and escalate any incident where appropriate. Online safety is included in our curriculum at all levels and information is also provided to parents/carers. When children / young people use the Group's network to access the internet, they are protected by accessing inappropriate content by a digital filtering system (FortiGuard Web Filtering) which flags students who are trying to access malicious, hacked or inappropriate websites.

18.2 The system will also alert the Group to inappropriate narrative or causes for concern which are typed in the browser. However, as many students are able to access the internet using their own data plan, to minimise inappropriate use, students receive tutorials on online safety.

18.3 All staff are made aware of the e-safety Policy sets our expectations relating to:

- Creating a safer online environment – including training requirements, filters and monitoring;
- Giving everyone the skills, knowledge and understanding to help children and young people stay safe on-line;
- Inspiring safe and responsible use and behaviour;
- Safe use of mobile phones both within college and on college trips/outings;
- Safe use of camera equipment, including camera phones; and
- What steps to take if you have concerns and where to go for further help.

18.4 All staff will receive on-line safety training as part of the ongoing safeguarding offer, which, amongst other things, will include an understanding of the expectations, applicable roles, and responsibilities in relation to filtering and monitoring. This training offer will be covered as part of induction. Alongside our Governing Body we will review the DfE Filtering and Monitoring Standards which can be found in the document Meeting Digital Technology Standards in Schools and Colleges (last updated March 2023) and discuss with IT staff and service providers what more needs to be done to meet all the standards in our setting. (See KCSIE 2023 para 141 for further information).

18.5 Staff must read the Staff Code of Conduct in relation to personal online behaviour and complete training in cyber security.

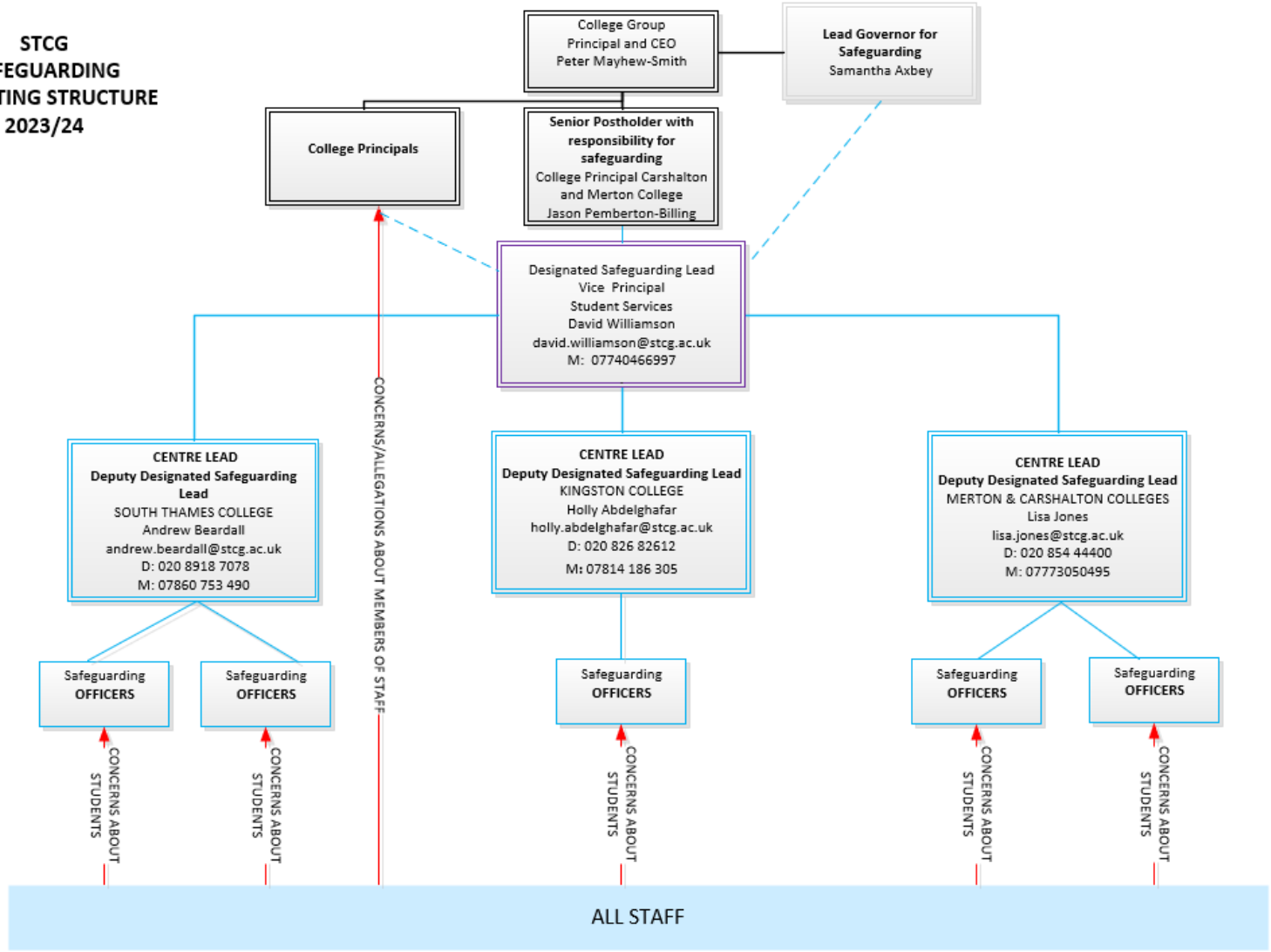
19. Review

19.1 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.

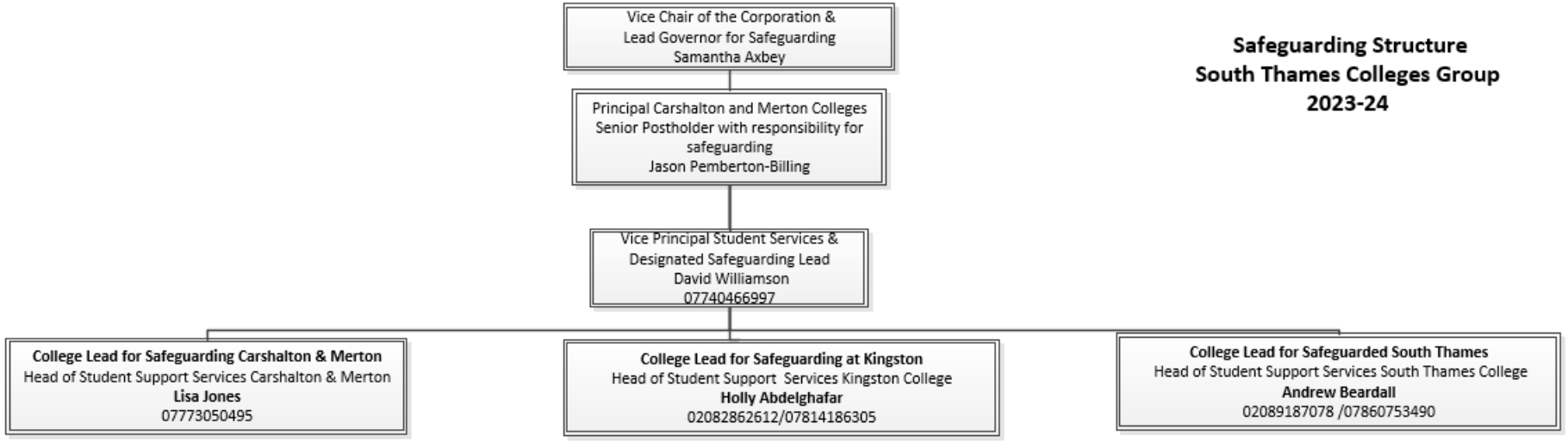
20. Access to the policy

20.1 The policy will be published on the Group website.

STCG SAFEGUARDING REPORTING STRUCTURE 2023/24



Safeguarding Structure
South Thames Colleges Group
2023-24



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

All staff at STCG are required to read Part 1.

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 and colleges and their staff are an important part of the wider safeguarding system for children. This system is described in the 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 interests** 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 the 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, promote children's welfare and prevent concerns from escalating.
7. **All** staff have 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 help.[1] 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 out their safeguarding duties and who will liaise closely with other services such as local authority children's social care.

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 headteachers) 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)[2]
- 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 are absent from education, particularly on repeat occasions and/or prolonged periods and
- role of the designated safeguarding lead (including the identity of the designated safeguarding lead and any deputies).

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

[2] 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.

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 online safety which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring – see para 141 for further information) at induction. The training should be regularly updated. In addition**, all** staff should receive safeguarding and child protection (including online safety) updates (for example, via email, e-bulletins, and staff meetings), as required, and at least annually, to continue to 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 local authority children's social care and for statutory assessments[3] 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 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 about a report of any form of abuse, as this may ultimately not be in the best interests of the child.

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 are being 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 designated safeguarding lead 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.

[3] Detailed information on statutory assessments can be found in Chapter 1 of Working Together to Safeguard Children

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, 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 so-called 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage
- is a privately fostered child, or
- 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 of the school/college, inside and outside of home, and online. Exercising professional curiosity and knowing what to look for is vital for 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 and other risks will take place concurrently both online and offline. 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 a 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 caregivers); 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 videos[4] can be signs that children are at risk. Below are some safeguarding issues all staff should be aware of. **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 child-on-child abuse), and that it can happen both inside and outside of school or college and online. **All**

[4] Consensual image sharing, especially between older children of the same age, may require a different response. It might not be abusive – 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.

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 a deputy).

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, prejudice-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 violence,[5] 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,[6] such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- consensual and non-consensual sharing of nude and semi-nude images and/or videos[11] (also known as sexting or youth produced sexual imagery)
- upskirting,[12] 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

[5] For further information about sexual violence see Part 5 and Annex B.
[6] 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.

- 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.

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 noncontact 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 for example 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 for example 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, 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 and long-term impact on their health, well-being, development, and ability to learn.

Female Genital Mutilation (FGM)

44. Whilst **all** staff should speak to the designated safeguarding lead (or a deputy) with regard to any concerns about female genital mutilation (FGM), there is a specific **legal duty on teachers**.[7] 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 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.

[7] 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 2002 (persons employed or engaged to carry out teaching work at schools and other institutions in England).

Serious violence

48. **All** staff should be aware of the indicators, which may signal children are at risk from, or are involved with, serious violent crime. These may include increased absence from school or 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 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 Annex B.

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 22 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 a 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,[8] or

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

- making a referral to statutory services,[9] for example as the child might be in need, is in need or suffering, or is 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 a 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 authority children's social care. In these circumstances, any action taken should be shared with the designated safeguarding lead (or a 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 the 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.

Early help assessment

58. If early help is appropriate, the designated safeguarding lead (or a 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 local authority children's social care for assessment for statutory services if the child's situation does not appear to be improving or is getting worse.

[9] 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.

Statutory children's social care assessments and services

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 authority 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:

- 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.

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

66. 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 a deputy) as required).

67. 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

68. **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, and
- a note of any action taken, decisions reached and the outcome.

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

Why is all of this important?

70. 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.[10] Further information about serious case reviews can be found in Chapter four of Working Together to Safeguard Children. Examples of poor practice include:

[10] An analysis of serious case reviews can be found at gov.uk/government/publications/analysis-of-seriouscase-reviews-2014-to-2017.

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

71. Schools and colleges should have processes and procedures in place to manage **any** safeguarding concern or allegation (no matter how small) about staff members (including supply staff, volunteers, and contractors).

72. If staff have a safeguarding concern or an allegation is made about another member of staff (including supply staff, volunteers, and contractors) **harming or posing a risk of harm to children**, then:

- this should be referred to the headteacher or principal
- where there is a concern/allegation about the headteacher 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 a concern/allegation about the headteacher, where the headteacher 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 local LADO should be easily accessible on your local authority's website.

73. 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

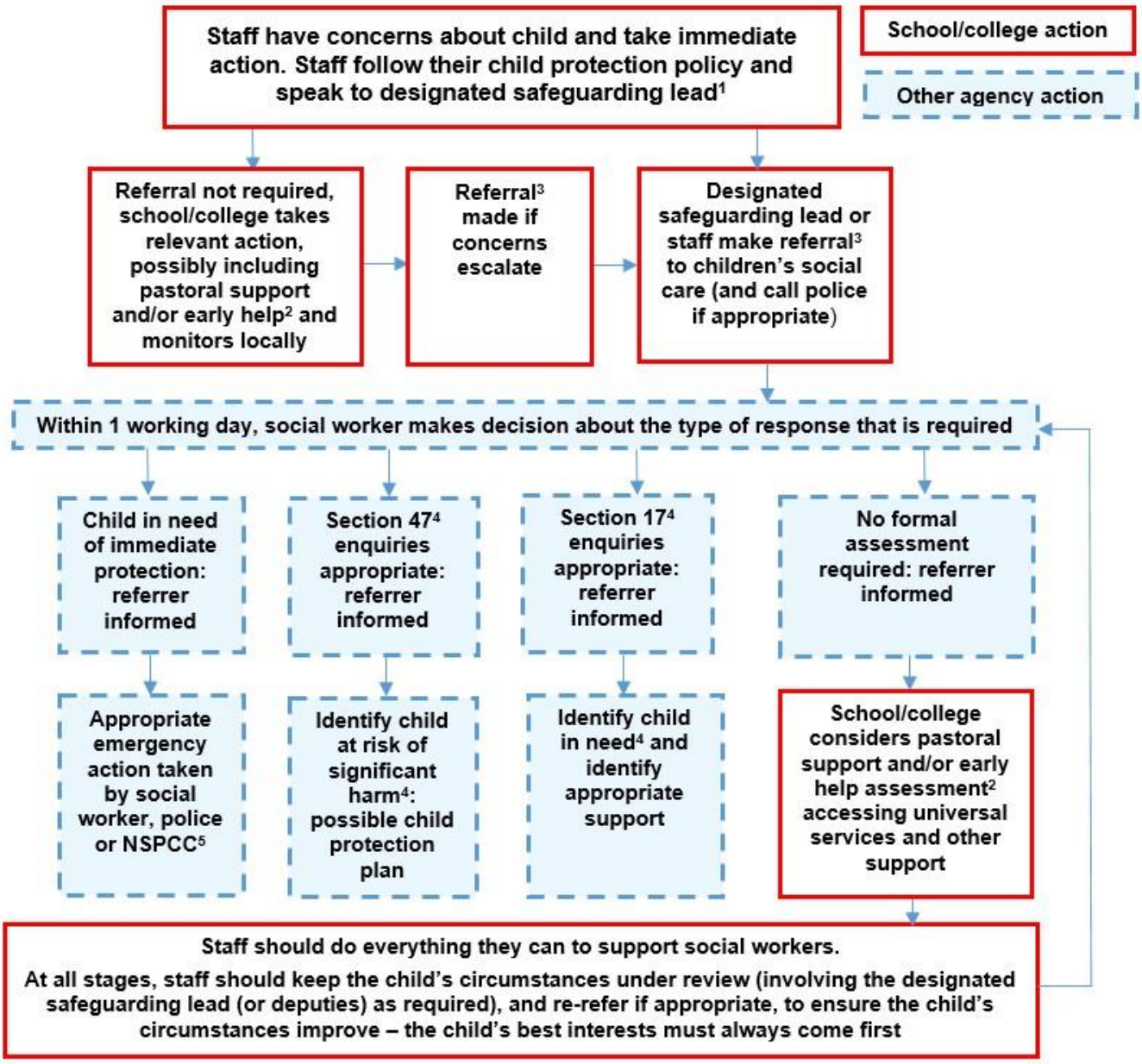
74. All staff and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in the school's or college's safeguarding regime and know that such concerns will be taken seriously by the senior leadership team.

75. Appropriate whistleblowing procedures should be put in place for such concerns to be raised with the school's or college's senior leadership team.

76. 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
- 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

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.

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: 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 a deputy).

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.

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, money 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 (CSE) 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 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 and The Children's Society County Lines Toolkit For Professionals

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 who are absent from education

All staff should be aware that children being absent from school or college, particularly repeatedly and/or for prolonged periods, and children missing education can act as a vital warning sign of a range of safeguarding possibilities. This may include abuse and neglect such as sexual abuse or exploitation and can also be a sign of child criminal exploitation including involvement in county lines. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital

mutilation, so-called 'honour'-based abuse or risk of forced marriage. Early intervention is essential to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child going missing in future. It is important that staff are aware of their school's or college's unauthorised absence procedures and children missing 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 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 at 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. Under the statutory definition, 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 abuse. Anyone can be a victim of domestic abuse, regardless of sexual identity, age, ethnicity, socio-economic status, sexuality or background and domestic abuse can take place inside or outside of the home. The government has issued 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 the 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 (or a deputy)) 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 local authority 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 | Safelives
- Domestic abuse: specialist sources of support (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 local authority 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 the focus to early intervention and encourages 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 children 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: here.

Mental health

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

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[11] has 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

[11] Public Health England: has now been replaced by the UK Health Security Agency and the Office for Health Improvement and Disparities (OHID), which is part of the Department of Health and Social Care, and by the UK Health Security Agency. However, the branding remains unchanged.

Preventing radicalisation

Children may be susceptible 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 schools or colleges safeguarding approach.

Extremism[12] is the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces.

Radicalisation[13] refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.

Terrorism[14] is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

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 people from extremist ideologies and intervene to prevent those at risk of radicalisation being drawn to terrorism. 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 (or a deputy) making a Prevent referral.

Although not a cause for concern on their own, possible indicators when taken into consideration alongside other factors or context may be a sign of being radicalised.

The Prevent duty

All schools and colleges are subject to a duty under section 26 of the Counter-Terrorism and Security Act 2015 (the CTSA 2015), in the exercise of their functions, to have "due regard[15] to the need to prevent people from being drawn into terrorism".[16] This duty is known as the Prevent duty.

[12] As defined in the Government's Prevent Duty Guidance for England and Wales.
[13] As defined in the Government's Prevent Duty Guidance for England and Wales.
[14] As defined in the Terrorism Act 2000 (TACT 2000) http://www.legislation.gov.uk/ukpga/2000/11/contents
[15] 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.
[16] "Terrorism" for these purposes has the same meaning as for the Terrorism Act 2000 (section 1(1) to (4) of that Act).

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 deputies) and other senior leaders in colleges should familiar 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.

Channel

Channel is a voluntary, confidential support programme which focuses on providing support at an early stage to people who are identified as being susceptible to being drawn into terrorism. Prevent referrals are assessed and may be passed to a multiagency Channel panel, which will discuss the individual referred to determine whether they are at risk of 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 will be required to provide their consent before any support delivered through the programme is provided.

The designated safeguarding lead (or a 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 guidance.

Additional support

The Department has published further advice for those working in education settings with safeguarding responsibilities 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 and college teachers and leaders to help them safeguard their students from radicalisation and extremism. The platform provides free information and resources to help 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 to 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, to support staff and governors/Board members in 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 (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 associated 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 just after school, when pupils are travelling to and from school. These times can be particularly risky for young people involved in serious violence.

Advice for schools and colleges is provided in the Home Office's Criminal exploitation of children and vulnerable adults: county lines guidance. The Youth Endowment Fund (YEF) Toolkit sets out the evidence for what works in preventing young people from becoming involved in 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 early in 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 HBA, 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 a deputy). As appropriate, the designated safeguarding lead (or a deputy) will activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with the 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**[17] that requires a different approach (see below).

FGM

FGM comprises all procedures involving 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.

[17] 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 2002 (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.[18] 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 a deputy) and involve local authority 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 to coerce a person into marriage. Schools and colleges can play an important role in safeguarding children from forced marriage.

The Forced Marriage Unit (FMU) has created: Multi-agency practice guidelines: handling cases of forced marriage (pages 75-80 of which focus on the role of schools and colleges) and, Multi-agency statutory guidance for dealing with forced marriage, which can both be found at The right to choose: government guidance on forced marriage - GOV.UK (www.gov.uk) School and college staff can contact the Forced Marriage Unit if they need advice or information: Contact: 020 7008 0151 or email fmu@fcdo.gov.uk.

In addition, since February 2023 it has also been a crime to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday, even if violence, threats or another form of coercion are not used. As with the existing forced marriage law, this applies to non-binding, unofficial 'marriages' as well as legal marriages.

[18] 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

Supporting practice in tackling child sexual abuse - CSA Centre Centre of Expertise on Child Sexual Abuse has free evidence-based practice resources to help professionals working with children and young people to identify and respond appropriately to concerns of child sexual abuse.

What to do if you're worried a child is being abused – DfE advice

Domestic abuse: Various Information/Guidance - Home Office (HO)

Faith based abuse: National Action Plan - DfE advice

Forced marriage resource pack

Disrespect NoBody campaign - GOV.UK - Home Office website

Tackling Child Sexual Abuse Strategy – Home Office policy paper

Together we can stop child sexual abuse – HM Government campaign

Bullying

Preventing bullying including cyberbullying - DfE advice

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 HM Prison and Probation Service

Child Exploitation

Trafficking: safeguarding children - DfE and Home Office guidance

Care of unaccompanied and trafficked children – DfE statutory guidance

Modern slavery: how to identify and support victims – HO statutory guidance

Child exploitation disruption toolkit - HO statutory guidance

County Lines Toolkit For Professionals - The Children's Society in partnership with Victim

Support and National Police Chiefs' Council

Multi-agency practice principles for responding to child exploitation and extra-familial harm – non-statutory guidance for local areas, developed by the Tackling Child Exploitation (TCE) Support Programme, funded by the Department for Education and supported by the Home Office, the Department for Health and Social Care and the Ministry of Justice

Confidentiality

Gillick competency Fraser guidelines - Guidelines to help with balancing children's rights along with safeguarding responsibilities.

Drugs

Drug strategy 2021 - Home Office strategy

Information and advice on drugs - Talk to Frank website

Drug and Alcohol education — teacher guidance & evidence review – PSHE Association

(So-called) "Honour Based Abuse" including FGM and forced marriage

Female genital mutilation: information and resources- Home Office guidance

Female genital mutilation: multi agency statutory guidance - DfE, Department for Health, and Home Office

Forced marriage - Forced Marriage Unit (FMU) resources

Forced marriage - Government multi-agency practice guidelines and multi-agency statutory guidance

FGM resource pack – HM Government guidance

Health and Well-being

Rise Above: Free PSHE resources on health, wellbeing and resilience - Public Health England

Supporting pupils at schools with medical conditions - DfE statutory guidance

Mental health and behaviour in schools - DfE advice

Overview - Fabricated or induced illness - NHS advice

Homelessness

Homelessness code of guidance for local authorities – Department for Levelling Up, Housing and Communities guidance

Information Sharing

Government information sharing advice - Guidance on information sharing for people who provide safeguarding services to children, young people, parents and carers.

Information Commissioner's Office: Data sharing information hub - Information to help schools and colleges comply with UK data protection legislation including UK GDPR.

Online safety-advice

Childnet provide guidance for schools on cyberbullying

Educateagainsthate provides practical advice and support on protecting children from extremism and radicalisation

London Grid for Learning provides advice on all aspects of a school or college's online safety arrangements

NSPCC E-safety for schools provides advice, templates, and tools on all aspects of a school or college's online safety arrangements

Safer recruitment consortium "guidance for safe working practice", which may help ensure staff behaviour policies are robust and effective

Searching screening and confiscation is departmental advice for schools on searching children and confiscating items such as mobile phones

South West Grid for Learning provides advice on all aspects of a school or college's online safety arrangements

Use of social media for online radicalisation - A briefing note for schools on how social media is used to encourage travel to Syria and Iraq

Online Safety Audit Tool from UK Council for Internet Safety to help mentors of trainee teachers and newly qualified teachers induct mentees and provide ongoing support, development and monitoring

Online safety guidance if you own or manage an online platform DCMS advice

A business guide for protecting children on your online platform DCMS advice

UK Safer Internet Centre provide tips, advice, guides and other resources to help keep children safe online

Online safety- Remote education, virtual lessons and live streaming

Guidance Get help with remote education resources and support for teachers and school leaders on educating pupils and students

Departmental guidance on safeguarding and remote education including planning remote education strategies and teaching remotely

London Grid for Learning guidance, including platform specific advice

National cyber security centre guidance on choosing, configuring and deploying video conferencing

UK Safer Internet Centre guidance on safe remote learning

Online Safety- Support for children

Childline for free and confidential advice

UK Safer Internet Centre to report and remove harmful online content

CEOP for advice on making a report about online abuse

Online safety- Parental support

Childnet offers a toolkit to support parents and carers of children of any age to start discussions about their online life, and to find out where to get more help and support

Commonsensemedia provide independent reviews, age ratings, & other information about all types of media for children and their parents

Government advice about protecting children from specific online harms such as child sexual abuse, sexting, and cyberbullying

Internet Matters provide age-specific online safety checklists, guides on how to set parental controls, and practical tips to help children get the most out of their digital world How Can I Help My Child? Marie Collins Foundation – Sexual Abuse Online

Let's Talk About It provides advice for parents and carers to keep children safe from online radicalisation

London Grid for Learning provides support for parents and carers to keep their children safe online, including tips to keep primary aged children safe online

Stopitnow resource from The Lucy Faithfull Foundation can be used by parents and carers who are concerned about someone's behaviour, including children who may be displaying concerning sexual behaviour (not just about online)

National Crime Agency/CEOP Thinkuknow provides support for parents and carers to keep their children safe online

Parentzone provides help for parents and carers on how to keep their children safe

online

Talking to your child about online sexual harassment: A guide for parents – This is the Children's Commissioner's parental guide on talking to their children about online sexual harassment

Private fostering

Private fostering: local authorities - DfE statutory guidance

Radicalisation

Prevent duty guidance- Home Office guidance

Prevent duty: additional advice for schools and childcare providers - DfE advice

Educate Against Hate website - DfE and Home Office advice

Prevent for FE and Training - Education and Training Foundation (ETF)

Extremism and Radicalisation Safeguarding Resources – Resources by London Grid for Learning

Managing risk of radicalisation in your education setting – DfE guidance

Serious Violence

Serious violence strategy - Home Office Strategy

Factors linked to serious violence and how these factors can be used to identify individuals for intervention – Home Office

Youth Endowment Fund – Home Office

Gangs and youth violence: for schools and colleges - Home Office advice

Tackling violence against women and girls strategy- Home Office strategy

Violence against women and girls: national statement of expectations for victims - Home Office guidance

Sexual violence and sexual harassment

Specialist Organisations

Barnardo's - UK charity caring for and supporting some of the most vulnerable children and young people through their range of services.

Lucy Faithful Foundation - UK-wide child protection charity dedicated to preventing child sexual abuse. They work with families affected by sexual abuse and also run the confidential Stop it Now! Helpline.

Marie Collins Foundation – Charity that, amongst other things, works directly with children, young people, and families to enable their recovery following sexual abuse.

NSPCC - Children's charity specialising in child protection with statutory powers enabling them to take action and safeguard children at risk of abuse.

Rape Crisis - National charity and the umbrella body for their network of independent member Rape Crisis Centres.

UK Safer Internet Centre - Provides advice and support to children, young people, parents, carers and schools about staying safe online.

Harmful sexual behaviour

Rape Crisis (England & Wales) or The Survivors Trust for information, advice, and details of local specialist sexual violence organisations.

NICE guidance contains information on, amongst other things: developing interventions; working with families and carers; and multi-agency working.

HSB toolkit The Lucy Faithfull Foundation - designed for parents, carers, family members and professionals, to help everyone play their part in keeping children safe. It has links to useful information,

resources, and support as well as practical tips to prevent harmful sexual behaviour and provide safe environments for families.

NSPCC Learning: Protecting children from harmful sexual behaviour and NSPCC - Harmful sexual behaviour framework- free and independent advice about HSB.

Contextual Safeguarding Network – Beyond Referrals (Schools) provides a school self-assessment toolkit and guidance for addressing HSB in schools.

Preventing harmful sexual behaviour in children - Stop It Now provides a guide for parents, carers and professionals to help everyone do their part in keeping children safe, they also run a free confidential helpline.

Support for Victims

Anti-Bullying Alliance - Detailed information for anyone being bullied, along with advice for parents and schools. Signposts to various helplines and websites for further support.

Rape Crisis - Provide and signpost to a range of services to support people who have experienced rape, child abuse or any kind of sexual violence.

The Survivors Trust- UK-wide national umbrella agency with resources and support dedicated to survivors of rape, sexual violence and child sex abuse.

Victim Support - Supporting children and young people who have been affected by crime. Also provides support to parents and professionals who work with children and young people – regardless of whether a crime has been reported or how long ago it was.

Childline provides free and confidential advice for children and young people.

Toolkits

ask AVA - The Ask AVA prevention platform has been created to support education practitioners across the UK to develop and deliver a comprehensive programme to stop Violence Against Women and Girls.

NSPCC - Online Self-assessment tool to ensure organisations are doing everything they can to safeguard children.

NSPCC - Resources which help adults respond to children disclosing abuse.

NSPCC also provides free and independent advice about HSB: NSPCC - Harmful sexual behaviour framework

Safeguarding Unit, Farrer and Co. and Carlene Firmin, MBE, University of Bedfordshire - Peer-on-Peer Abuse toolkit provides practical guidance for schools on how to prevent, identify early and respond appropriately to peer-on-peer abuse.

Contextual Safeguarding Network – self-assessment toolkit for schools to assess their own response to HSB.

Childnet - STAR SEND Toolkit equips, enables and empowers educators with the knowledge to support young people with special educational needs and disabilities.

Childnet - Just a joke? provides lesson plans, activities, a quiz and teaching guide designed to explore problematic online sexual behaviour with 9-12 year olds.

Childnet - Step Up, Speak Up a practical campaign toolkit that addresses the issue of online sexual harassment amongst young people aged 13-17 years old.

NSPCC - Harmful sexual behaviour framework an evidence-informed framework for children and young people displaying HSB.

Contextual Safeguarding Network – Beyond Referrals - Schools leavers for addressing HSB in schools.

Farrer & Co: Addressing child on child abuse: a resource for schools and colleges. This resource provides practical guidance for schools and colleges on how to prevent, identify early and respond appropriately to child-on-child abuse.

Sharing nudes and semi-nudes

London Grid for Learning-collection of advice - Various information and resources dealing with the sharing of nudes and semi-nudes.

UKCIS Sharing nudes and semi-nudes: advice for education settings working with children and young people - Advice for schools and colleges on responding to incidents of non-consensual sharing of nudes and semi-nudes.

Support for parents/carers

National Crime Agency's CEOP Education Programme provides information for parents and carers to help protect their child from online child sexual abuse, including #AskTheAwkward, guidance on how to talk to their children about online relationships

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

1. Introduction

1.1 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.

1.2 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.

1.3 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,[19] 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,[20] 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).

1.4 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

[19] For further information about sexual violence see Annex B

[20] For further information about sexual harassment see Annex B.

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

1.5 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 2023)* 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

2.1 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

4.2 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.

4.3 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

4.4 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

4.5 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.

4.6 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.

4.7 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. This includes risk assessing on a case-by-case basis. If the College feels that there remains a risk which it cannot mitigate, then they reserve the right to consider not allowing the alleged perpetrator to remain in College.

- 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.

- The College will where necessary include referral/ liaison with wider community and local/national organisations to provide further specialist advice and guidance: involvement from the Police or referrals to Early Help, Specialist Children's Services, or CAMHS.

4.8 Unsubstantiated, unfounded, false or malicious reports

4.9 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.

4.10 If a report is found to be deliberately invented or malicious, the Group will decide whether disciplinary action is appropriate.

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

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

4.13 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 if 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.

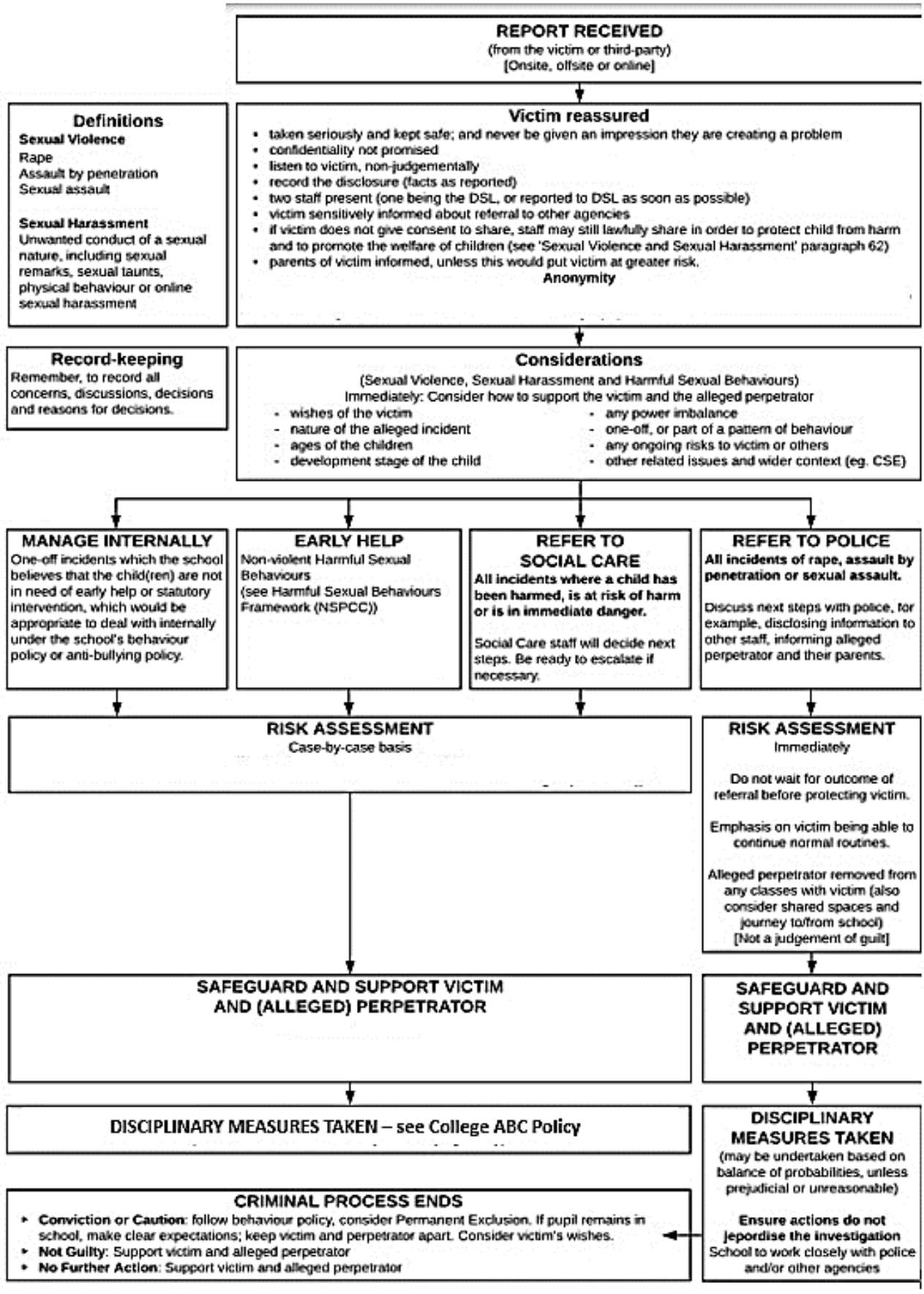
They help the College to:
(a) To develop a good awareness and understanding of the different referral pathways that operate in its local area, as well as the preventative and support services which exist
(b) ensure that our students can access the range of services and support they need quickly
(c) support 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

Appendix 2 CHILD-ON CHILD/ SEXUAL VIOLENCE/ HARASSMENT ABUSE FLOWCHART