



# East Coast College

## Safeguarding Children and Vulnerable Adults Policy and Procedure

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This document can be provided in a larger font, electronically or other accessible requirement, upon request.

## Policy Consultation & Review

This policy is available on the College website, intranet and in printed form on request. We inform students, parents and carers about this policy at induction and through College information media.

The policy is provided to all staff (including temporary staff and volunteers) enclosed with their offer letter alongside our Staff Code of Conduct. In addition, all staff are provided with Part One of the statutory guidance '*Keeping Children Safe in Education*' (DfE, 2019), where understanding is verified via Smartlog Safeguarding training completion.

All staff who are employed, commissioned or contracted to teach or work on behalf of the college, in either a paid or unpaid capacity, should be familiar with college procedures and protocols for safeguarding.

### 1 Purpose & Aims

1.1 The purpose of East Coast College's safeguarding policy and procedure is to ensure every young person (under the age of 18) and vulnerable adult who is a student at the College is safe and protected from harm. This means we will always work to:

- Identify those at risk and protect young people and vulnerable adults\* at the College from maltreatment
- Prevent impairment of young peoples' and vulnerable adults' health development, or access to education
- Ensure that young peoples' and vulnerable adults' development takes place in circumstances consistent with the provision of safe and effective care
- Undertake that role so as to enable young people and vulnerable adults at the college to have the best outcomes
- Ensure the College is a safe environment

\*A vulnerable adult is someone who is over the age of 18 and who is, or may be, unable to take care of themselves or unable to protect themselves against significant harm, exploitation or radicalisation – Definition taken from '*No Secrets: Guidance on developing and implementing multi-agency policies and procedures to protect vulnerable adults from abuse*' (Home Office/Department of Health, January 2015).

1.2 This policy will give clear direction to students, staff, parents, carers, governors, volunteers and visitors about expected behaviour and our legal responsibility to safeguard and promote the wellbeing of all young people and vulnerable adults at the College and to ensure that all members of the College community are treated with dignity and respect.

1.3 The College fully recognises the contribution it can make to protect young people and vulnerable adults from harm and supporting their wellbeing. For the purposes of this policy and its associated procedures, 'harm' is taken to mean neglect, physical, financial, emotional or sexual abuse or bullying (including cyber-bullying) arising from any circumstances, of which we become aware. Further information

regarding types of abuse can be found in Part One of the statutory guidance '*Keeping Children Safe in Education*' (DfE, Sept 2019) in Appendix 5.

1.4 This policy applies to all students, staff, parents, carers, governors,

volunteers and visitors to the College and to all employers providing an experience of work for our students.

## **2 Our Ethos**

- 2.1 The wellbeing of our students is of paramount importance. The College will establish and maintain an ethos where all students feel secure, safe and listened to. Students at the College will be able to talk freely to any member of staff if they are worried or concerned about something. All students have access to safeguarding and wellbeing advice at the College.
- 2.2 Everyone who comes into contact with young people and vulnerable adults at the College has a responsibility to safeguard. We recognise that staff at the College play an important role as they are in a position to identify concerns early and provide help for young people and vulnerable adults to prevent concerns from escalating. All staff are advised to maintain an attitude of *'it could happen here'* where safeguarding is concerned. We will ensure that all staff working in all parts of the College understand their personal responsibilities and have access to the Designated Senior Lead. The Designated Senior Lead will be responsible for dealing with allegations or suspicions of harm to every young person (under the age of 18) or vulnerable adult.
- 2.3 All staff will, through training and induction, know how to recognise indicators of concern, how to respond to a disclosure from a young person or vulnerable adult and how to record and report this information. This information is clearly identified via the Safeguarding and Wellbeing Referral Flowchart Appendix 1 which highlights the difference in response to a non-urgent concern and a concern which involves immediate risk of harm. Regular visitors who will be seeing students on a 1:1 basis will be required to sign a declaration that they will adhere to a Partner Code of Conduct which includes safeguarding. A record of these declarations will be stored on the Single Central record by the People Team. All visitors and contractors will be required to read safeguarding information at sign-in.
- 2.4 Students will be informed that what they tell us will be kept confidential but may be shared with or without consent if it is deemed a young person or vulnerable adult is at risk of immediate or significant harm. The aim will always be to gain consent prior to sharing information but this may not always be possible. Every student will know what the person they have spoken to will have to do with any information they have chosen to disclose.
- 2.5 Throughout students' time at East Coast College we will provide activities and opportunities for young people and vulnerable adults to develop the skills they need to identify risks, build resilience and stay safe via the C7 Tutorial Programme and individual course activities. Our response should be preventative and reactive – managing the needs of students who are at risk of immediate harm as well as addressing the risk factors of potential crisis, building resilience and encouraging positive decision making.

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<sup>1</sup> Regular visitors are defined as those who are expected to visit more than once in an academic year.

- 2.6 At all times we will work in partnership and endeavour to establish effective working relationships with parents, carers and colleagues from other agencies in line with *'Working Together to Safeguard Children'* (HM Government, July 2018).

- 2.7 Where we have control over media and access to online resources, we will endeavour that young people are not exposed to inappropriate content. Internet facilities will be subject to automatic screening via software along with user agreements for all staff. Online access provided by host families will be subject to filtering and monitoring.

### **3 Roles and Responsibilities**

- 3.1 It is the responsibility of every member of staff, volunteer and visitor to the College to ensure that they carry out the requirements of this policy and, at all times, work in a way that will safeguard and promote the wellbeing of all students.

#### **The Governing Body**

- 3.2 The Governing Body is accountable for ensuring the effectiveness of this policy and our compliance with it. Although our Governing Body takes collective responsibility to safeguard and promote the wellbeing of our students, we also have a named governor who champions safeguarding within the College. This, however, does not remove responsibility from the Governing Body as a whole and all individual governors to ensure safeguarding duties are met in line with '*Keeping Children Safe in Education*' (DfE, September 2019).
- 3.3 The Governing Body will ensure that:
- The safeguarding policy is in place and is reviewed annually, is available publicly via the College website and has been written in line with national guidance and the requirements of the Norfolk and Suffolk Safeguarding Children and Adults Partners' policies and procedures;
  - A minimum of one governor is designated to monitor safeguarding and attend relevant safeguarding meetings.
  - The College contributes to inter-agency working in line with '*Working Together to Safeguard Children*' (HM Government, July 2018);
  - A member of the senior leadership team is designated to take the lead responsibility for safeguarding and that there are alternate and appropriately trained members of staff identified to deal with any issues in the absence of the Designated Senior Lead. There will always be cover for this role during core college hours. Outside of these core college hours the responsibility falls to the Duty Principal;
  - All staff receive a safeguarding induction and are provided with a copy of this policy, a copy of Part 1 and Appendix A of '*Keeping Children Safe in Education*' (DfE, September 2019) and the staff code of conduct;
  - All staff undertake appropriate safeguarding training;
  - Procedures are in place for dealing with allegations against members of staff and volunteers in line with statutory guidance;
  - Safer recruitment practices are followed in accordance with the requirements of '*Keeping Children Safe in Education*' (DfE, September 2019)
  - They remedy without delay any weakness in regard to our safeguarding.
- 3.4 The governing body will receive a safeguarding report on a termly basis that will record the training that has taken place, the number of staff attending and any outstanding training requirements for the College. It will also record all relevant safeguarding activity that has taken place, for example, meetings attended, reports written, training or induction given. It will not

identify individual students or include any identifying information.

### **The Principal**

3.5 The Principal is responsible for:

- Identifying a member of the senior leadership team to be the Designated Senior Lead (Keeping Children Safe In Education, September 2019) for safeguarding;
- Ensuring that the safeguarding and wellbeing policies and procedures agreed by the governing body are followed by all staff.

### **The Deputy Principal**

3.6 The Deputy Principal is responsible for:

- Ensuring that all staff and volunteers feel able to raise concerns about poor or unsafe practice and such concerns are addressed sensitively in accordance with agreed Public Interest Disclosure ('Whistle-blowing') procedures;
- Liaising with the Local Authority Designated Officer at the Norfolk and Suffolk Safeguarding Children and Adults Partners in the event of an allegation of abuse being made against a member of staff or ensuring the Designated Senior Lead does this when the Deputy Principal is not available. The Head of People Team will be kept informed by the Deputy Principal or Designated Senior Lead at all stages.
- Acting as Designated Lead in the absence of the Designated Senior Lead (Assistant Principal for Student Wellbeing and Support) and Safeguarding Co-ordinator.

### **The Designated Senior Lead**

3.7 The Designated Senior Lead will carry out their role in accordance with the responsibilities outlined in of *'Keeping Children Safe in Education'* (DfE, September 2019). The Designated Senior Lead will provide supervision, advice and support to other staff on student safeguarding and wellbeing matters. Any concern for a young person's or vulnerable adult's safety or wellbeing will be recorded and made available to the Designated Senior Lead or designated member of the safeguarding and wellbeing team who will consider the context of the concern.

3.8 The Designated Senior Lead or designated members of the safeguarding and wellbeing team will represent the College at child protection conferences and core group meetings. Through appropriate training, knowledge and experience the Designated Senior Lead or designated member of the safeguarding and wellbeing team will liaise with Children's Services and other agencies where necessary, and make referrals of suspected abuse to Children's Services, take part in strategy discussions and other interagency meetings and contribute to the assessment of young people and vulnerable adults.

3.9 The Designated Senior Lead will ensure written records and safeguarding files are maintained and that they are kept confidentially, centrally and stored securely.

3.10 The Designated Senior Lead, in collaboration with the People Team, is responsible for ensuring that all staff members and volunteers are aware of our policy and the procedure they need to follow. They will ensure that all staff, volunteers and regular visitors have received appropriate safeguarding information during induction and have undertaken the agreed annual training on safeguarding, PREVENT and E-Safety.

3.11 The Designated Senior Lead will co-ordinate the college action plan and

implementation of the PREVENT agenda in line with the 'Counter Terrorism and Security Act 2015' and 'CONTEST' (HM Government 2018).

- 3.12 The Designated Senior Lead is responsible for ensuring liaison with education and other providers to transfer safeguarding information for students in a timely manner. Where relevant this will also include that current Service Level Agreements for information sharing are in place.

#### **The Designated Safeguarding Co-ordinator**

- 3.13 Designated Safeguarding Co-ordinator is responsible for:

- Receiving and recording information from any staff, volunteers, children, parents or carers who have safeguarding concerns;
- Assessing the information promptly and carefully, clarifying and obtaining more information about the matter as appropriate;
- Consulting with relevant agencies to agree actions required;
- Making formal referrals to relevant agencies and completing risk assessments where required;
- Keeping accurate formal records of referrals, concerns and actions taken, providing data as requested;
- Acting as Deputy Designated Lead in the absence of the Designated Senior Lead.

#### **4 Training & Induction (Coordinated by The People Team as part of Continuous Professional Development)**

- 4.1 When new staff, volunteers or regular visitors join the College they will be informed of the safeguarding arrangements in place and asked to complete appropriate safeguarding training prior to commencement of employment via the People Team. They will be given a copy of the College's safeguarding policy and Part One of 'Keeping Children Safe in Education' (DfE, September 2019) along with the staff code of conduct and told who our Designated Senior Lead for Safeguarding is. They will also be given information on how to refer disclosures or other concerns. Staff understanding of the College's safeguarding policy and Part One of 'Keeping Children Safe in Education' (DfE, September 2019) is confirmed by completion of the annual SmartLog safeguarding training.

- 4.2 Every new member of staff or volunteer will have an induction period that will include essential safeguarding information. This programme will include basic safeguarding information relating to signs and symptoms of abuse, how to manage a disclosure from a young person or vulnerable adult, how to record any issues of confidentiality. The induction will also remind staff and volunteers of their responsibility to safeguard all young people and vulnerable adults at the College and the remit of the role of the Designated Senior Lead. A

minimum of annual safeguarding training will also take place on current themes, legislative changes, PREVENT and E-Safety.

- 4.3 In addition to the safeguarding induction, all members of staff will undertake appropriate safeguarding training in accordance with Norfolk and Suffolk Safeguarding Children and Adults Partner's advice. This will be coordinated and recorded by the People Team. In addition to annual training updates, further staff updates will be given via team meetings and informal case review with the referrer and members of the safeguarding and wellbeing team, following referrals.

- 4.4 All regular visitors to the College will be given a set of our safeguarding

procedures and contact details for the safeguarding and wellbeing team. They will also be required to agree to the Code of Contact for Partners which includes agreement to adhere to East Coast College's Safeguarding Policy and Procedures. Details of these agreements will be stored within the Single Central Record. Any partner who is expected to visit campus more than once in an academic year is classified as a regular visitor.

- 4.5 The Designated Senior Lead and members of the safeguarding and wellbeing team will attend multi-agency training courses as advised by Norfolk or Suffolk Safeguarding partners. In addition to this, the Designated Senior Lead and the safeguarding and wellbeing team members will attend Designated Senior Lead training as advised by Norfolk and Suffolk Safeguarding Children and Adults Partners guidance.
- 4.6 The governing body will also undertake appropriate training to ensure they are able to carry out their safeguarding duties.
- 4.7 We will ensure our staff keep up to date with the most recent local and national safeguarding advice and guidance including the areas of PREVENT, Child Sexual and Criminal Exploitation and so called 'Honour-based' abuse such as Female Genital Mutilation, Forced Marriage and practices such as breast ironing in line with '*Keeping Children Safe in Education*' (DfE, September 2019). The Designated Senior Lead will also provide regular safeguarding updates for staff.
- 4.8 It will be required that staff with recruitment responsibilities will complete safer recruitment training prior to involvement with recruitment in line with the People Team's requirements.
- 4.9 The People Team will coordinate and collate CPD updates where legislative changes dictate need.
- 4.10 Host families will be offered the opportunity to access regular safeguarding training and development opportunities.

## **5 Procedures for managing concerns**

- 5.1 The College adheres to safeguarding procedures that have been agreed locally through the Norfolk or Suffolk Safeguarding Partners.
- 5.2 Every member of staff including volunteers are advised to maintain an attitude of '*it could happen here*' where safeguarding is concerned. When concerned about the wellbeing of a young person or vulnerable adult, staff members have a responsibility to take action as outlined in this policy.
- 5.3 All staff are required to report any concerns that they have and not to see these as insignificant. A referral may be justified by a single incident such as an injury or disclosure of abuse or concerns may accumulate over a period of time and are evidenced by building up a picture. It is crucial that staff record and pass on all concerns in accordance with this policy to allow the Senior

Designated Lead and safeguarding and wellbeing team to record a timeline and access support for the young person or vulnerable adult at the earliest opportunity. The factual and accurate recording of these concerns at the time of concern will give referral agencies the best information and opportunity to progress a referral.

- 5.4 It is not the responsibility of the College staff to investigate wellbeing concerns or determine the truth of any disclosure or allegation. All staff, however, have a duty to recognise concerns and pass the information on promptly in accordance with the procedures outlined in this policy. During Safeguarding training staff will be advised not ask leading questions and the reasons for this. Staff will also be advised to not promise confidentiality

during a disclosure.

- 5.5 The safeguarding and wellbeing team should be used as a first point of contact for concerns and queries regarding any safeguarding concern in the College. Any member of staff or visitor to the College who receives a disclosure of abuse or suspects that a young person or vulnerable adult is at risk of harm must report it immediately to the designated member of the safeguarding and wellbeing team.
- 5.6 All concerns about a young person or vulnerable adult should be reported without delay using one of the agreed reporting methods.
- 5.7 Following receipt of any information raising concern, the Designated Senior Lead or designated member of the safeguarding and wellbeing team will consider what action to take. This may lead to onward referrals being completed or seeking advice from the Multi-Agency Safeguarding Hub (MASH), police or other agencies as required. All information and actions taken, including the reasons for any decisions made, will be fully documented. This information will be stored within the central safeguarding and wellbeing recording systems which recognise that safeguarding issues are complex and may have many facets.
- 5.8 All referrals will be made in line with the Multi-Agency Safeguarding Hub's procedures. Referrals may be made to all tiers within child and adult services.
- 5.9 Staff should always follow the reporting procedures outlined in the safeguarding procedure in the first instance. However, they may also share information directly with the Multi-Agency Safeguarding Hub or the police if they have followed the reporting procedures outlined in this policy but feel appropriate action has not been taken
- 5.10 Any member of staff who does not feel that concerns about a young person or vulnerable adult have been responded to appropriately by the College safeguarding team and in accordance with the procedures outlined in this policy should raise their concerns with the Senior Management Team. If any member of staff does not feel the situation has been addressed appropriately at this point they should contact the Multi-Agency Safeguarding Hub directly with their concerns.
- 5.11 Any concerns raised by contractors such as cleaning staff are to be raised with Estates and will then be directed through the usual reporting procedure.
- 5.12 The College seeks to provide support to safeguard adults from abuse or neglect in line with *The Care Act 2014*. The local authority have a responsibility to promote individual wellbeing, which includes mental health and emotional wellbeing, protection from abuse and neglect and participation in education and training (including young carers). We will refer to this Local Authority responsibility as a best practice guide in conjunction with referral support provided by our collaboration with the Local Safeguarding Adults Partnership.

## **6 Procedures for managing allegations of sexual violence and harassment between peers.**

- 6.1 The College views that sexual violence and sexual harassment is not acceptable and will not be tolerated. In the event of an allegation of sexual violence or sexual harassment between peers the College will follow the protocols laid out in '*Sexual Violence and Sexual Harassment between Children in Schools and College*' (DfE, May 2018). This may include removing the alleged perpetrator from shared classes or college

premises pending investigation. This should not be perceived as a judgement of guilt on the perpetrator.

- 6.2 Allegations of peer on peer sexual violence and sexual harassment will be recorded and investigated in line with safeguarding protocols outlined in this policy and procedure. Support will be given to all parties including, where relevant, referrals to external agencies for specialist interventions.
- 6.3 The College's C7 Tutorial Programme includes reinforcement of the concept that sexual violence and sexual harassment is not acceptable across several elements. While it is noted that there is a gendered aspect to reporting of sexual violence and sexual harassment the concept that anyone can be a victim or a perpetrator is embedded as part of this programme.
- 6.4 In line with changes in legislation instances of 'upskirting' will be viewed as sexually harmful behavior and potentially criminal.

## **7 Records and information sharing**

- 7.1 If staff are concerned about the wellbeing or safety of any young person or vulnerable adult at the College they will report their concern in one of the agreed methods. Any concerns should be passed to the designated member of the safeguarding and wellbeing team without delay.
- 7.2 Any paper-based information recorded will be kept in a separate named file, in a secure cabinet, in accordance with legislation and not with the student's academic file. These files will be the responsibility of the Designated Senior Lead. Safeguarding information will only be shared within College on the basis of 'need to know in the student's interests' and on the understanding that it remains strictly confidential. Consent for sharing of this information will be gained wherever possible. Electronically-stored information will remain within the College's bespoke safeguarding system and is only accessible by designated MIS staff with responsibility for maintaining this system and by members of the safeguarding and wellbeing team.
- 7.3 Sharing of information external to East Coast College will take place within the framework outlined by '*Information Sharing*' (HM Government, July 2018) and '*Working Together to Safeguard Children*' (HM Government, July 2018). Consent for sharing this information will be gained wherever possible.
- 7.4 When a young person or vulnerable adult leaves the College, the Designated Senior Lead will make contact with the Designated Senior Lead/MASH team at the new college or training provider/County and will ensure that the safeguarding file/information is forwarded to them in an appropriately agreed manner. We will retain evidence to demonstrate how the file has been transferred; this may be in the form of a written confirmation of receipt from the receiving college and/or evidence of recorded delivery. Please see appendix 4 for the College's file transfer protocol.
- 7.5 The Student Finance and Learning Support teams will provide the safeguarding and wellbeing team with a list of vulnerable students and will update this information as needed. Vulnerable students include but are not limited to Looked After Children, Care Leavers under 25, Unaccompanied Asylum Seekers, those subject to a Special Guardianship Order, those subject to a Child Arrangement Order, Young Carers under 25, carers of those with an additional need aged 25 or over, those who disclose they are adopted, students accessing Free College Meals and those with Educational Health Care Plans, disabilities or are accessing High Needs funding.

- 7.6 The destinations of withdrawn students will be checked termly to pick up additional safeguarding concerns related to children missing education who we are unable to contact. Concerns will follow safeguarding and wellbeing flowchart process.

## **8 Working with parents and carers**

- 8.1 The College is committed to working in partnership with parents and carers to safeguard and promote the wellbeing of young people and vulnerable adults and to support them to understand our statutory responsibilities in this area.
- 8.2 When new students join the College, parents and carers will be informed that we have a safeguarding policy. A copy will be provided to parents on request and is available on the College website. Parents and carers will be informed of our legal duty to assist our colleagues in other agencies with safeguarding enquiries and what happens should we have cause to make a referral to an external agency where the need arises.
- 8.3 We are committed to working with parents and carers positively, openly and honestly. We ensure that all parents and carers are treated with respect, dignity and courtesy. We respect parents' and carers' rights to privacy and confidentiality and will not share sensitive information unless we have permission or it is necessary to do so in order to safeguard a young person or vulnerable adult from harm and in line with '*Information Sharing*' (HM Government, July 2018).
- 8.4 We will seek to share with parents and carers any concerns we may have about their child unless to do so may place a young person or vulnerable adult at increased risk of harm. A lack of parental/carer engagement or agreement regarding the concerns the College has about a young person or vulnerable adult will not prevent the Designated Senior Lead making a referral to the Multi- Agency Safeguarding Hub or other relevant agency in those circumstances where it is appropriate to do so.
- 8.5 In order to keep young people and vulnerable adults safe the College requires accurate and up to date information regarding:
- Emergency contact details
  - Any details on court orders where contact is to be withheld

## **9 Child Protection conferences**

- 9.1 Children's Services will convene a Child Protection conference once a child protection enquiry under Section 47 of the Children Act 1989 has been undertaken and the young person is judged to be at continuing risk of significant harm. A review conference will take place once a young person has been made the subject of a Child Protection Plan in order to monitor their safety and the required reduction in risk.
- 9.2 Safeguarding and wellbeing team members may be asked to attend a child protection conference, strategy or core group meetings on behalf of the College in respect of individual young people. All reports for child protection conferences will be prepared in advance using the guidance and education template provided by Children's Services. The information contained in the report will be shared with parents and carers before the conference as appropriate and will include information relating to the young person's physical, emotional and intellectual development and their presentation at College. In order to complete such reports, all relevant information will be sought from staff working with the young person in College. Strategy meetings are convened at short-notice to agree a plan in respect of a new concern/new information received and as such does

not include the parent/carer and information should not be shared with the parent/carer before the strategy meeting unless agreement to do so has been received from the meeting chair.

## **10 Safer recruitment for staff and volunteers**

10.1 We will ensure that at least one member of every staff recruitment panel has completed appropriate safer recruitment training. At all times the Principal and Governing Body will ensure that safer recruitment practices are followed in accordance with the requirements of '*Keeping Children Safe in Education*', (DfE, September 2019).

There will be a mandatory question on safeguarding at all interviews and any gaps in employment will be explored in the interview/references.

10.2 The College will use the recruitment and selection process to reject unsuitable candidates. It is the College's policy to have at least two written references, one of which must be from the current/last employer, to have documentary proof of qualifications and eligibility to work in the UK, and satisfactory DBS clearance. Any offer of employment will be conditional on this documentation being satisfactory to the College. We will question the contents of application forms if we are unclear about them. We will also undertake barred lists check prior to employment and Disclosure and Barring Service checks and use any other means of ensuring we are recruiting and selecting the most suitable people to work with young people and vulnerable adults. For staff working teaching with Lowestoft Sixth Form an additional Prohibition Order check will be completed. The College's Recruitment and Selection policy will also provide guidance on specific law such as the Rehabilitation of Offenders Act 1974 and actions required for agency staff.

10.3 We will maintain a Single Central Record of all safer recruitment checks carried out in line with statutory requirements. This will be held securely within the People Team and subject to audit by the Head of the People Team and Designated Senior Lead.

10.4 Members of the Governing Body will be recorded on the Single Central Record and will have an enhanced DBS and barred lists check.

10.5 Where a residential placement is being provided relevant members of the household will be subject to an enhanced DBS and barred lists checks. This will be recorded on the Single Central Record.

10.6 Written notification will be obtained from any agency, or third party organisation, that the organisation has carried out safer recruitment checks in line with '*Keeping Children Safe in Education*' (DfE, September 2019).

## **11 Safer working practice**

11.1 All adults who come into contact with our students have a duty of care to safeguard and promote their wellbeing. There is a legal duty placed upon us to ensure that all adults who work with or on behalf of our students are competent, confident and safe to do so.

11.2 All staff will be provided with a copy of the College's code of conduct at induction and will be required to carry out their duties in accordance with this advice.

11.3 If staff, visitors or volunteers are working with young people or vulnerable adults alone they will be required to inform another member of staff of their whereabouts in College, who they are with and for how long. Unless the partner has completed a Code of Conduct and supplied DBS details (non-statutory only) they will be accompanied at all times on college premises and when seeing students.

- 11.4 Guidance about acceptable conduct and safe practice will be given to all staff and volunteers during induction. All staff and volunteers are required to carry out their work in accordance with this guidance and will be made aware that failure to do so could lead to disciplinary action.
- 11.5 Where a room booking is requested by an external agency or person details of the booking person and organisation (if applicable) will be recorded by the staff member taking the booking using the agreed form. In accordance with Home Office guidance for preventing radicalisation both the name and organisation will be internet searched by the person taking the room booking to ensure they are not publically part of an extremist group. This will be recorded on the agreed form. Any concerns will be raised with the Designated Senior Lead or designated member of the safeguarding and wellbeing team.
- 11.6 Marketing and other publicity which includes photographs or identifying characteristics will be checked by a designated member of the safeguarding and wellbeing team prior to approval for publication. Parents/carers of 16/17 year olds are informed that photographs of students may be used unless permission is withdrawn by the parent/carer for agreed safeguarding reasons, the individual student will be informed of rationale for this. Photograph permission for students will be gained as part of the enrolment process and withdrawn consent recorded on the student's ProMonitor page. Marketing will confirm with subjects that photo consent previously gained is still valid before publication of photographs or identifying characteristics external to East Coast College.
- 11.7 According to the Protection of Freedoms Act 2012 the College has a significant proportion of children and young people on site during opening times and has therefore determined that it is treated as a 'specified place' and therefore all staff are engaged in regulated activity under the regulations stipulated in the Act.
- 11.8 Clinical supervision is provided by the Designated Safeguarding Lead. If there is a conflict in the content of supervision required this will be provided by the agreed external counselling provider. Supervision for the Designated Safeguarding Lead is available from the agreed external counselling provider.

## **12 Managing allegations against staff and volunteers**

- 12.1 Our aim is to provide a safe and supportive environment which secures the wellbeing and very best outcomes for all our students. We recognise that sometimes an allegation of abuse may be made. All staff must be familiar with and abide by the College's Professional Code of Conduct for Staff which is provided to all staff on appointment.
- 12.2 We will take all possible steps to safeguard our young people and vulnerable adults and to ensure that the staff and volunteers in our College are safe to work with them. We will always ensure that the procedures outlined by the Norfolk and Suffolk Safeguarding partners and '*Keeping Children Safe in Education*', (DfE, September 2019) are adhered to and will seek appropriate advice from the Local Authority Designated Officer. The Local Authority Designated Officer can be contacted on 0300 123 2044 (Suffolk) or 01603 223473 (Norfolk).
- 12.3 In line with '*Keeping Children Safe in Education*' (DfE, September 2019), If staff have safeguarding concerns or an allegation is made about a staff member or volunteer who works at the College this should be referred to the Principal, or deputy in his absence, who will appoint an investigating officer. Should an allegation be made against the Principal, this will be reported to

the Chair of Governors. In the event that the Chair of Governors is not contactable on that day, the information must be passed to and dealt with by either the Head of Governance or the Vice Chair of Governors.

- 12.4 The Designated Senior Lead or Head of People Team will seek advice from the Local Authority Designated Officer within one working day. No member of staff or the governing body will undertake further investigations before receiving advice from the Local Authority Designated Officer.
- 12.5 Any member of staff or volunteer who does not feel confident to raise their concerns with Principal or Chair of Governors should contact the Local Authority Designated Officer directly on 0300 123 2044 (Suffolk) or 01603 223473 (Norfolk). Advice can be gained from the NSPCC Whistleblowing Adviceline on 0800 028 0285 or [help@nspcc.org.uk](mailto:help@nspcc.org.uk).
- 12.6 The College has a legal duty to refer to the Disclosure and Barring Service if there is reason to believe the member of staff has committed one of a number of listed offences, and who has been removed from working (paid or unpaid) in regulated activity, or would have been removed had they not left. The DBS will consider whether to bar the person. If these circumstances arise in relation to a member of staff at the College, a referral will be made as soon as possible after the resignation or removal of the individual in accordance with advice from the Local Authority Designated Officer.

### **13 Residential placements (under 18)**

- 13.1 Where students are placed by the college in a residential setting arrangements will be made in line with *Keeping Children Safe in Education (September 19)* and *Further Education Residential Accommodation: National Minimum Standards (September 19)*.
- 13.2 This will include ensuring unmonitored contact with parents/carers and external support services such as ChildLine.
- 13.3 Students placed in residential settings by the College will have access to a named person(s) to whom they can report personal problems and concerns. This person(s) will have undergone safeguarding training and will be available outside of core College hours.

### **14 Relevant policies**

- 14.1 To underpin the values and ethos of the College and our intent to ensure that students at the College are appropriately safeguarded the following policies are also included under our safeguarding umbrella. This can all be found on the college intranet:
  - Staff Code of Conduct;
  - Recruitment Policy;
  - Whistleblowing;
  - Security Threat Procedure.
  - PREVENT;
  - Student Inclusion and Disciplinary;
  - Online safety;
  - Health, Safety and Wellbeing Policy;
  - First aid Policy;
  - Industry placement Policy and Procedure

## 15 Statutory framework

This policy has been devised in accordance with the following legislation and guidance:

- *'Working Together to Safeguard Children'* (HM Government, July 2018)
- *'Keeping Children Safe in Education'* (DfE, September 2019)
- *'What to do if you are Worried a Child is Being Abused'* (DfE, March 2015)
- Norfolk and Suffolk Safeguarding partners procedures
- *Relevant OFSTED guidance*
- *'Children and Social Work Act 2017'*
- *'Sexual Violence and Sexual Harassment between Children in Schools and Colleges'* (DfE, May 2018)
- *'Multi-agency Statutory Guidance on Female Genital Mutilation'* (HM Government, April 2016)
- *'Information Sharing: Advice for Practitioners providing safeguarding Services to Children, Young People, Parents and Carers'* (HM Government, July 2018)
- *Care Act 2014*
- *'Criminal Exploitation of Children and Vulnerable Adults: County Lines Guidance'* (Home Office, July 2017)
- *The General Data Protection Regulation (GDPR) and Data Protection Act 2018*
- *Further Education Residential Accommodation: National Minimum Standards* (DfE September 2018)
- *'CONTEST : The United Kingdom's Strategy for Countering Terrorism'* (HM Government June 2018)



# **East Coast College**

## **Addendum:**

**COVID-19 College online and unlock  
Guidance for Safeguarding of Children and  
Vulnerable Adults at East Coast College**

## 1 Key Contacts

Nikki Lane	Designated Safeguarding Lead	07823349288	n.lane@eastcoast.ac.uk
Tif Ward	Alternate DSL – Great Yarmouth Campus	07795306828	t.ward@eastcoast.ac.uk
Paula Webster	Alternate DSL – Lowestoft Campus	07747442823	p.webster@eastcoast.ac.uk
Brett Thomas	Alternate DSL – Lowestoft Sixth Form	07507767293	b.thomas@lowestoftsfc.ac.uk

## 2 Context

There have been significant changes within our setting and within the UK in response to the outbreak of COVID-19.

This guidance sets out some of the adjustments East Coast College is making in line with the changed arrangements in the college and following advice from government and local agencies.

The current position is that, following the Government announcement, all college sites are closed and timetables have been postponed except for planned assessments. It is likely that new safeguarding concerns will be raised as staff members begin to see students in person as they return to the classroom / face to face support.

Despite the changes, the College's Safeguarding Policy is fundamentally the same: the welfare of children and vulnerable adults always comes first, staff should respond robustly to safeguarding concerns and referrals should continue to be made in line with our established safeguarding procedure.

The pressures on children, young people and their families at this time are significant. There will be heightened awareness of family pressures for a variety of reasons including through having to stay within the household, through financial hardship or health anxiety. These areas should be considered in terms of setting any work for students to undertake at home (including recognising the impact of online learning and ability to access on line resources). Staff may be aware of the mental health of both students and their parents or carers, and should refer to safeguarding about any emerging concerns.

### **3 Reporting a concern**

Staff should continue to follow the safeguarding procedures and advise the safeguarding team immediately about concerns they have about any student, whether in college or not. It is vital that as much detail is shared as possible, to enable the safeguarding team to respond quickly and gain the most appropriate level of support.

COVID-19 means a need for increased vigilance due to the pressures on services, families and young people, rather than a reduction in our standards. The College is working alongside local partners to adapt to changes in service and deliver the best support available.

Please contact the safeguarding and wellbeing team by the telephone numbers listed above where you have an immediate concern / are 6<sup>th</sup> Form based. They will respond to the concern and log on MyLink/Dashboard. For college staff: if you have access to MyLink please continue to log confidential comments as you normally would. If you do not have access to MyLink to log confidential comments please continue to contact via phone. A trained Designated Safeguarding Lead will be available during college hours by phone, video-call or in person as the campuses re-open.

Normal safeguarding procedures apply for referrals to children or adult services. This contact will go through a member of the safeguarding and wellbeing team (listed above) who will follow appropriate measures in seeking the appropriate and necessary support.

Should a child or vulnerable adult be at risk of significant harm and local agencies are not able to respond, the college will immediately follow the relevant safeguarding children/adult partnership escalation procedure.

### **4 New staff or volunteers**

All new starters must have an on line induction. They must read the college Safeguarding Children and Vulnerable Adults Policy and Procedure, Keeping Children Safe in Education Part 1 and Annex A and the staff Code of Conduct. They will also be required to complete online training regarding Prevent, GDPR and safeguarding.

During their induction their line manager will ensure new recruits know who to contact if worried about a child or vulnerable adult.

### **5 Peer on peer abuse**

We recognise the potential for abuse to go on between young people, especially in the context of a college closure or partial closure. Our staff will remain vigilant to the signs of peer-on-peer abuse, including those between young people who are not currently attending our provision. Extra care should be taken where groups have mixed age, developmental stages, are attending other education establishments as an interim

measure and similar. When making contact with these families our staff may ask about relationships between learners.

## **6 Online safety**

It is extremely important that professional boundaries do not slip during this exceptional period and protocols for on line working have been issued. With such different arrangements in place, students could be at greater risk of on line abuse. We remind all staff to maintain the view that 'it could happen here' and to immediately report any concern, no matter how small, to the safeguarding and wellbeing team.

Students will be using the internet more during this period. The College may also use online approaches to deliver training or support. Staff will be aware of the signs and signals of cyberbullying and other risks online and apply the same student-centred safeguarding practices as when students are learning at the College. The College continues to ensure appropriate filters and monitors are in place for those accessing the internet via college wifi. The College has taken on board the guidance from the UK Safer Internet Centre on safe remote learning and guidance for safer working practice from the Safer Recruitment Consortium.

Staff can access further guidance here:

<https://www.tes.com/news/coronavirus-10-safeguarding-rules-teachers-home>

<https://learning.nspcc.org.uk/news/2020/march/undertaking-remote-teaching-safely/>

## **7 Mental health**

Restrictions to movement and contact with other people means students could be more likely to be at risk of mental health problems. The Department for Education have produced guidance to support parents and carers:

<https://www.gov.uk/government/publications/covid-19-guidance-on-supporting-children-and-young-peoples-mental-health-and-wellbeing>

## **8 Parents and carers**

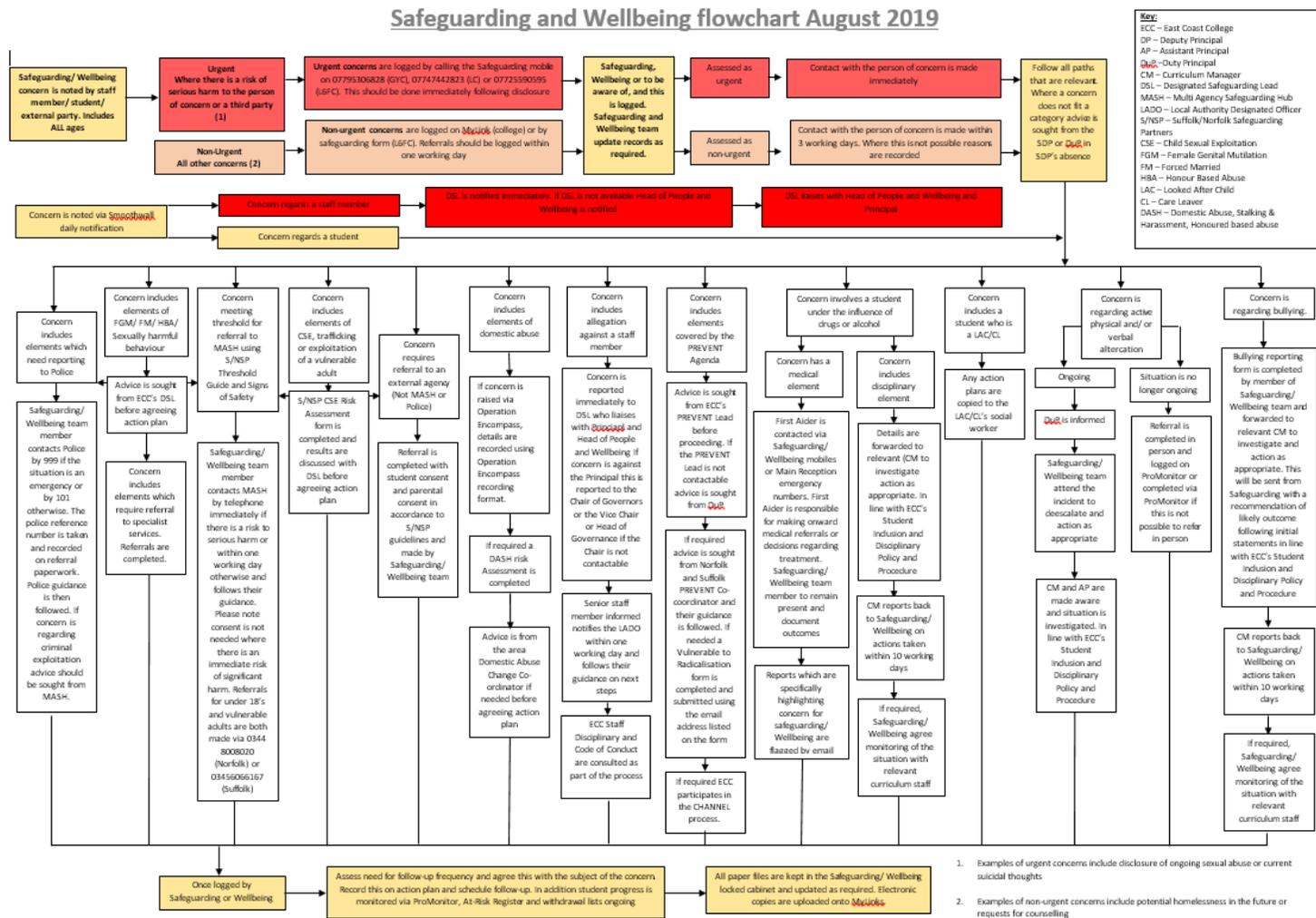
Parents and carers will receive information about keeping students safe online with peers, the College and the wider internet community. We have set out the College's approach, including the sites students will be asked to access and named who from the college (if anyone) their student is going to be interacting with online.

Regular communication is in place for parents/carers with contact details available and parent/carer updates are saved to view on the college website.

Supportive resources and contacts are available and updated via the website and the use of text messaging and social media campaigns are in place.

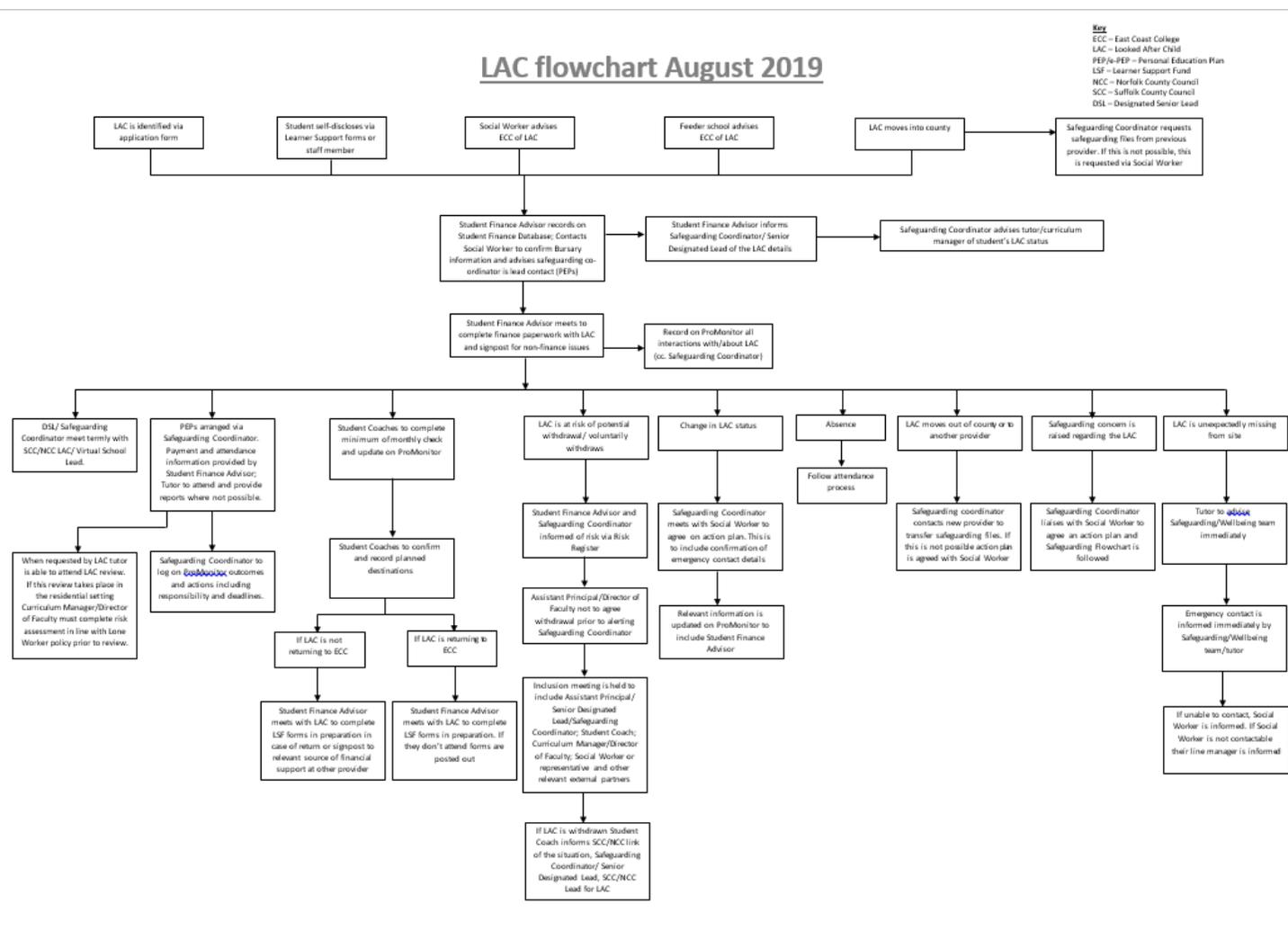
# Appendix 1: Procedure flow chart August 19<sup>2</sup> - Available on East Coast College Intranet Safeguarding area

## Safeguarding and Wellbeing flowchart August 2019



<sup>2</sup> To be reviewed and amended by the Designated Senior Lead or Safeguarding Co-Ordinator as required in line with changes to legislation and Norfolk or Suffolk Safeguarding partners.

## Appendix 2: LAC flow chart August 19<sup>3</sup> - Available on East Coast College Intranet Safeguarding area



<sup>3</sup> To be reviewed and amended by the Designated Senior Lead or Safeguarding Co-Ordinator as required in line with changes to legislation and Norfolk or Suffolk Safeguarding partners.

# Appendix 3: Safeguarding, Prevent and Wellbeing Quick Guide August 19<sup>4</sup> - Available on East Coast College Intranet Safeguarding area

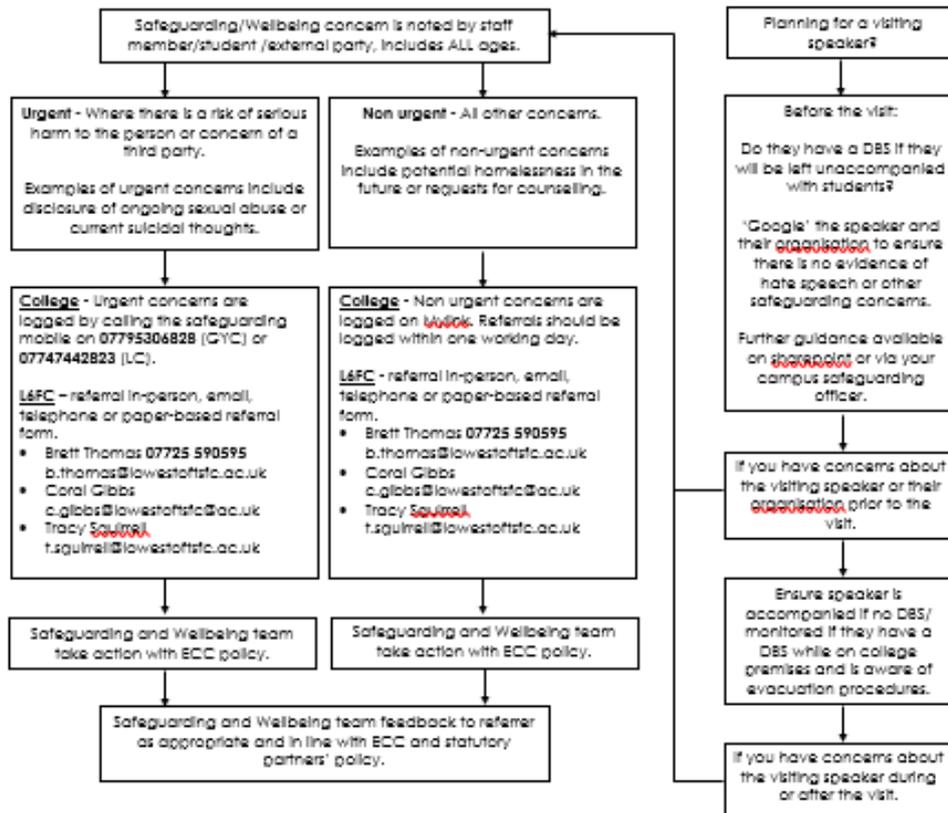
## Safeguarding, Prevent and Wellbeing Quick Guide

### What is safeguarding and wellbeing?

Ensuring the safety and wellbeing of students, staff and visitors at East Coast College.

### What is Prevent?

The strategy to stop people becoming radicalised into extreme ideologies or terrorism.



### Key definitions:

**Honor-based abuse** - any abuse committed to protect the **honour** of a family or a community including forced marriage and female genital mutilation.

**Forced marriage** - where one or both people do not consent to the marriage, have the capacity to consent to the marriage or where there is coercion or abuse in gaining consent to the marriage.

**Female genital mutilation (FGM)** - procedure where female genitals are deliberately cut, injured or changed without medical cause.

**Human trafficking and modern slavery** - recruitment, **transportation** or transporting people into a situation of exploitation through the use of violence, deception or coercion.

**Criminal exploitation** - people being exploited to criminal activities through coercion and control such as county lines or theft to order.

**Sexual exploitation** - people being exploited into sexual activities through coercion and control.

**Domestic abuse** - controlling, coercive or threatening **behaviour**, violence or abuse between those aged 16 or above who are or have been intimate partners or family members regardless of gender or sexuality.

**Bullying** - the repetitive, intentional hurting of one person or a group, where the relationship involves a balance of power.

**Harassment** - unwanted **behaviour** which is offensive or makes someone feel intimidated or humiliated.

Please see Moodle for further sources of information.

August 2019

<sup>4</sup> To be reviewed and amended by the Designated Senior Lead or Safeguarding Co-Ordinator as required in line with changes to legislation and Norfolk or Suffolk Safeguarding partners.

## Appendix 4: Safeguarding File handover protocol August 2019

### Protocol for Safeguarding File Transfer

#### **Files received from feeder schools and other settings**

These files should be recorded on safeguarding systems by the receiving campus. If this is not the campus where the student is currently studying they should be informed of the existence of the file. This should be uploaded to the campus safeguarding system and the paper file stored at the receiving campus. A copy of the sending setting's safeguarding handover sheet should also be uploaded to the campus' safeguarding system.

#### **Files transferred between campuses**

Files must be signed out at the current campus and signed in at the new campus. A note should be made on safeguarding systems of the transfer including who is transferring the file. File transfers should only be handled by DSLs.

#### **Files used for internal or external meetings**

If a file is needed for internal or external meetings which take place outside of the office where the file is stored it will be signed out and back in again by the staff member using it. Files should only be signed out by a DSL.

#### **Files to be transferred to other settings**

Following a student leaving East Coast College and progressing to another provider their file should be transferred by a DSL. This should be recorded on safeguarding systems and a copy of the transfer paperwork also uploaded to safeguarding systems.

**Safeguarding File Signing in/out sheet**

Student Name	Student Number	Signing Out			Signing In		
		Campus	Date	Staff Member Signature	Campus	Campus	Date

### Safeguarding File Transfer Record

<b>Name of student</b>	
<b>Date of birth</b>	

<b>Method of delivery</b>	
<b>Date file sent</b>	
<b>Name of person sending the file</b>	
<b>Role of person sending the file</b>	
<b>Signature of person sending the file</b>	
<b>Name of provider receiving the file</b>	
<b>Date received</b>	
<b>Name of person receiving the file</b>	
<b>Role of person receiving the file</b>	
<b>Signature of the person receiving the file</b>	

## Appendix 5: Keeping Children Safe in Education (DfE, September 2019) Part 1 and Annex A

### 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 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 impairment of children's health or development;
  - ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and
  - taking action to enable all children to have the best outcomes.
5. Children includes everyone under the age of 18.

##### The role of school and college staff

6. School and college staff are particularly important as they are in a position to identify concerns early, provide help for children, and prevent concerns from escalating.
7. **All staff** have a responsibility to provide a safe environment in which children can learn.

8. **All staff** should be prepared to identify children who may benefit from early help.<sup>3</sup> 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 a concern about a child's welfare should follow the referral processes set out in paragraphs 36-47. 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 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.<sup>4</sup>

### 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;
- behaviour policy;<sup>5</sup>
- staff behaviour policy (sometimes called a code of conduct);
- safeguarding response to children who go missing from education; and
- role of the designated safeguarding lead (including the identity of the designated safeguarding lead and any deputies).

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<sup>3</sup> Detailed information on early help can be found in Chapter 1 of [Working Together to Safeguard Children](#).

<sup>4</sup> 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.

<sup>5</sup> 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 of this document should be provided to staff at induction.

14. All staff should receive appropriate safeguarding and child protection training which is regularly updated. In addition, all staff should receive safeguarding and child protection updates (for example, via email, e-bulletins and staff meetings), as required, and at least annually, to provide them with relevant skills and knowledge to safeguard children effectively.

15. All staff should be aware of their local early help<sup>6</sup> process and understand their role in it.

16. All staff should be aware of the process for making referrals to children's social care and for statutory assessments 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.<sup>7</sup>

17. All staff should know what to do if a child tells them he/she is being abused 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 children's social care. Staff should never promise a child that they will not tell anyone about a report of abuse, as this may ultimately not be in the best interests of the child.

## What school and college staff should look out for

### Early help

18. 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 and has specific additional needs;
- has special educational needs (whether or not they have a statutory Education, Health and Care Plan);
- 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;
- is frequently missing/goes missing from care or from home;
- is at risk of modern slavery, trafficking or exploitation;

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<sup>6</sup> Detailed information on early help can be found in Chapter 1 of [Working Together to Safeguard Children](#).

<sup>7</sup> More information on statutory assessments is included at paragraph 42. Detailed information on statutory assessments can be found in Chapter 1 of [Working Together to Safeguard Children](#).

- is at risk of being radicalised or exploited;
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse;
- is misusing drugs or alcohol themselves;
- has returned home to their family from care; and
- is a privately fostered child.

### Abuse and neglect

19. Knowing what to look for is vital to the early identification of abuse and neglect. All staff should be aware of indicators of abuse and neglect so that they are able to identify cases of children who may be in need of help or protection. If staff are unsure, they should **always** speak to the designated safeguarding lead (or deputy).

20. All school and college staff should be aware that abuse, neglect and safeguarding issues are rarely stand-alone events that can be covered by one definition or label. In most cases, multiple issues will overlap with one another.

### Indicators of abuse and neglect

21. **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. 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.

22. **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.

23. **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.

24. **Sexual abuse:** involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education (see paragraph 27).

25. **Neglect:** the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy, for example, as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

#### **Safeguarding issues**

26. **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, alcohol abuse, deliberately missing education and sexting (also known as youth produced sexual imagery) put children in danger.

#### **Peer on peer abuse**

27. **All staff** should be aware that children can abuse other children (often referred to as peer on peer abuse). This is most likely to include, but may not be limited to:

- bullying (including cyberbullying);
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm;
- sexual violence,<sup>8</sup> such as rape, assault by penetration and sexual assault;

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<sup>8</sup> For further information about sexual violence see Annex A.

- sexual harassment,<sup>9</sup> such as sexual comments, remarks, jokes and online sexual harassment, which may be stand-alone or part of a broader pattern of abuse;
- upskirting,<sup>10</sup> which typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm;
- sexting (also known as youth produced sexual imagery); and
- initiation/hazing type violence and rituals.

28. All staff should be clear as to the school's or college's policy and procedures with regards to peer on peer abuse.

#### Serious violence

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

30. All staff should be aware of the associated risks and understand the measures in place to manage these. Advice for schools and colleges is provided in the Home Office's [Preventing youth violence and gang involvement](#) and its [Criminal exploitation of children and vulnerable adults: county lines](#) guidance<sup>11</sup>.

#### Female Genital Mutilation

31. 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**.<sup>12</sup> 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. See Annex A for further details.

#### Contextual safeguarding

32. Safeguarding incidents and/or behaviours can be associated with factors outside the school or college and/or can occur between children outside the school or college. All staff, but especially the designated safeguarding lead (and deputies) should be considering the context within which such incidents and/or behaviours occur. This is

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<sup>9</sup> For further information about sexual harassment see Annex A.

<sup>10</sup> For further information about 'upskirting' see Annex A.

<sup>11</sup> For further information about violent crime see Annex A.

<sup>12</sup> 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).

known as contextual safeguarding, which simply means assessments of children should consider whether wider environmental factors are present in a child's life that are a threat to their safety and/or welfare. Children's social care assessments should consider such factors 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 the full context of any abuse. Additional information regarding contextual safeguarding is available here: [Contextual Safeguarding](#).

#### Additional information and support

33. 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.

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

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

35. 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.

36. If staff have any concerns about a child's welfare, they should act on them immediately. See page 16 for a flow chart setting out the process for staff when they have concerns about a child.

37. If staff have a concern, they should follow their own organisation's child protection policy and speak to the designated safeguarding lead (or deputy).

38. Options will then include:

- managing any support for the child internally via the school's or college's own pastoral support processes;
- an early help assessment;<sup>13</sup> or

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<sup>13</sup> Further information on early help assessments, provision of early help services and accessing services is in Chapter 1 of [Working Together to Safeguard Children](#).

- a referral for statutory services,<sup>14</sup> for example as the child might be in need, is in need or suffering or likely to suffer harm.

39. The designated safeguarding lead or a deputy should always be available to discuss safeguarding concerns. If in exceptional circumstances, the designated safeguarding lead (or deputy) is not available, this should not delay appropriate action being taken. Staff should consider speaking to a member of the senior leadership team and/or take advice from local children's social care. In these circumstances, any action taken should be shared with the designated safeguarding lead (or deputy) as soon as is practically possible.

40. Staff should not assume a colleague or another professional will take action and share information that might be critical in keeping children safe. They should be mindful that early information sharing is vital for effective identification, assessment and allocation of appropriate service provision. [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 and General Data Protection Regulation (GDPR). 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 promote the welfare, and protect the safety of children.

#### Early help

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

#### Statutory assessments

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

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<sup>14</sup> 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.

### Children in need

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

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, including all forms of abuse and neglect, female genital mutilation or other so-called honour based violence, and extra-familial threats like radicalisation and sexual exploitation.

43. The online tool [Report Child Abuse to Your Local Council](#) directs to the relevant local children's social care contact number.

### What will the local authority do?

44. Within one working day of a referral being made, a local authority social worker should acknowledge 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;
- the child is in need, and should be assessed under section 17 of the Children Act 1989;
- 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;
- any services are required by the child and family and what type of services
- further specialist assessments are required to help the local authority to decide what further action to take;
- to see the child as soon as possible if the decision is taken that the referral requires further assessment.

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

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

47. 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**

48. All concerns, discussions and decisions made, and the reasons for those decisions, should be recorded in writing. If in doubt about recording requirements, staff should discuss with the designated safeguarding lead (or deputy).

### **Why is all of this important?**

49. It is important for children to receive the right help at the right time to address risks and prevent issues escalating. Research and serious case reviews have repeatedly shown the dangers of failing to take effective action.<sup>15</sup> Examples of poor practice include:

- failing to act on and refer the early signs of abuse and neglect;
- poor record keeping;
- failing to listen to the views of the child;
- failing to re-assess concerns when situations do not improve;
- not sharing information;
- 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 concerns about another staff member who may pose a risk of harm to children**

50. If staff have safeguarding concerns, or an allegation is made about another member of staff (including volunteers) posing a risk of harm to children, then:

- this should be referred to the headteacher or principal;
- where there are concerns/allegations 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 concerns/allegations about the headteacher, where the headteacher is also the sole proprietor of an independent school, allegations should be reported directly to the designated officer(s) at the local authority. (Further details can be found in Part four of this guidance).

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<sup>15</sup> An analysis of serious case reviews can be found at [Serious case reviews, 2011 to 2014](#).

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

51. 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.

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

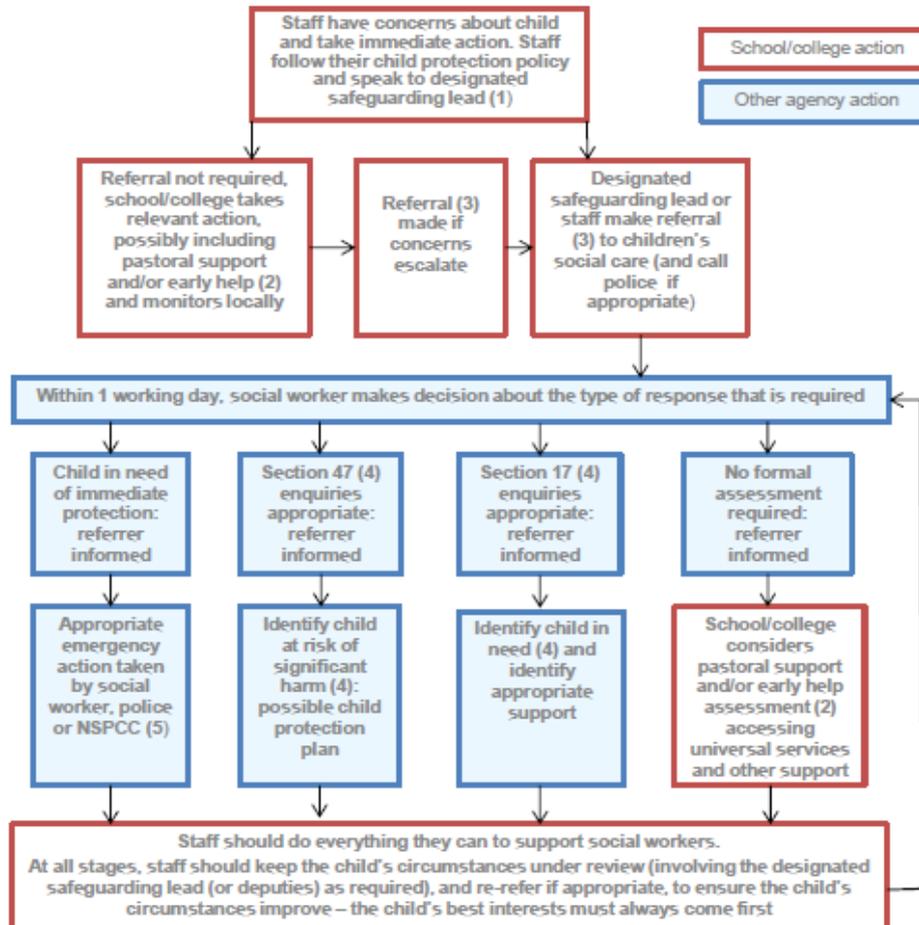
53. Where a staff member feels unable to raise an issue with their employer, or feels that their genuine concerns are not being addressed, other whistleblowing channels may be open to them:

- general guidance on whistleblowing can be found via: [Advice on Whistleblowing](#); and
- the [NSPCC's what you can do to report abuse dedicated helpline](#) is available as an alternative route for staff who do not feel able to raise concerns regarding child protection failures internally or have concerns about the way a concern is being handled by their school or college. Staff can call 0800 028 0285 – line is available from 8:00 AM to 8:00 PM, Monday to Friday and email: [help@nspcc.org.uk](mailto:help@nspcc.org.uk).<sup>16</sup>

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<sup>16</sup> Alternatively, staff can write to: National Society for the Prevention of Cruelty to Children (NSPCC), Weston House, 42 Curtain, Road, London EC2A 3NH.

## Actions where there are concerns about a child



(1) In cases which also involve a concern or an allegation of abuse against a staff member, see Part four of this guidance.

(2) Early help means providing support as soon as a problem emerges at any point in a child's life. Where a child would benefit from co-ordinated early help, an early help inter-agency assessment should be arranged. Chapter one of [Working Together to Safeguard Children](#) provides detailed guidance on the early help process.

(3) Referrals should follow the process set out in the local threshold document and local protocol for assessment. Chapter one of [Working Together to Safeguard Children](#).

(4) Under the Children Act 1989, local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare. Children in need may be assessed under section 17 of the Children Act 1989. Under section 47 of the Children Act 1989, where a local authority has reasonable cause to suspect that a child is suffering or likely to suffer significant harm, it has a duty to make enquiries to decide whether to take action to safeguard or promote the child's welfare. Full details are in Chapter one of [Working Together to Safeguard Children](#).

(5) This could include applying for an Emergency Protection Order (EPO).

## Annex A: Further information

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

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

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

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## **Children and the court system**

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

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

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

## **Children missing from education**

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

## **Children with family members in prison**

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

## **Child sexual exploitation**

Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or

increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact, it can also occur through the use of technology. Like all forms of child sex abuse, child sexual exploitation:

- can affect any child or young person (male or female) under the age of 18 years, including 16 and 17 year olds who can legally consent to have sex;
- can still be abuse even if the sexual activity appears consensual;
- can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity;
- can take place in person or via technology, or a combination of both;
- can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence;
- may occur without the child or young person's immediate knowledge (e.g. through others copying videos or images they have created and posted on social media);
- can be perpetrated by individuals or groups, males or females, and children or adults. The abuse can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse; and
- is typified by some form of power imbalance in favour of those perpetrating the abuse. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources.

Some of the following signs may be indicators of child sexual exploitation:

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

### **Child criminal exploitation: county lines**

Criminal exploitation of children is a geographically widespread form of harm that is a typical feature of county lines criminal activity, drug networks or gangs groom and exploit children and young people to carry drugs and money from urban areas to suburban and rural areas, market and seaside towns. Key to identifying potential involvement in county

lines are missing episodes, when the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism<sup>102</sup> should be considered. Like other forms of abuse and exploitation, county lines exploitation:

- can affect any child or young person (male or female) under the age of 18 years;
- can affect any vulnerable adult over the age of 18 years;
- can still be exploitation even if the activity appears consensual;
- can involve force and/or enticement-based methods of compliance and is often accompanied by violence or threats of violence;
- can be perpetrated by individuals or groups, males or females, and young people or adults; and
- is typified by some form of power imbalance in favour of those perpetrating the exploitation. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, cognitive ability, physical strength, status, and access to economic or other resources.

### **Domestic abuse**

The cross-government definition of domestic violence and abuse is:

Any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass, but is not limited to:

- psychological;
- physical;
- sexual;
- financial; and
- emotional.

Exposure to domestic abuse and/or violence 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. Domestic abuse affecting young people can also occur within their personal relationships, as well as in the context of their home life.

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<sup>102</sup> [Home Office - Modern slavery victims: referral and assessment forms.](#)

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](#)
- [Safelives: young people and domestic abuse.](#)

## Homelessness

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

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

In most cases 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. Children's services will be the lead agency for these young people and the designated safeguarding lead (or a deputy) should ensure appropriate referrals are made based on the child's circumstances. The department and the Ministry of Housing, Communities and Local Government have published joint statutory guidance on the provision of accommodation for 16 and 17 year olds who may be homeless and/or require accommodation: [here](#).

## **So-called 'honour-based' violence (including Female Genital Mutilation and Forced Marriage)**

So-called 'honour-based' violence (HBV) 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 HBV 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 HBV, or already having suffered HBV.

### **Actions**

If staff have a concern regarding a child that might be at risk of HBV or who has suffered from HBV, they should speak to the designated safeguarding lead (or deputy). As appropriate, they will activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and children's social care. Where FGM has taken place, since 31 October 2015 there has been a mandatory reporting duty placed on teachers<sup>103</sup> that requires a different approach (see following section).

### **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 will 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

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<sup>103</sup> 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).

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](#)

Teachers **must** personally report to the police cases where they discover that an act of FGM appears to have been carried out.<sup>104</sup> Unless the teacher has good reason not to, they should still consider and discuss any such case with the school's or college's designated safeguarding lead (or deputy) and involve children's social care as appropriate. The duty does not apply in relation to at risk or suspected cases (i.e. where the teacher does not discover that an act of FGM appears to have been carried out, either through disclosure by the victim or visual evidence) or in cases where the woman is 18 or over. In these cases, teachers should follow local safeguarding procedures. The following is a useful summary of the FGM mandatory reporting duty: [FGM Fact Sheet](#).

### **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 communities use religion and culture as a way to coerce a person into marriage. Schools and colleges can play an important role in safeguarding children from forced marriage.

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

### **Preventing radicalisation**

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

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<sup>104</sup> 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.

[Extremism](#)<sup>105</sup> 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](#)<sup>106</sup> refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.

There is no single way of identifying whether a child is likely to be susceptible to an extremist ideology. 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) and settings (such as the internet).

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

#### 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"<sup>107</sup> to the need to prevent people from being drawn into terrorism".<sup>108</sup> This duty is known as the Prevent duty.

The Prevent duty should be seen as part of schools' and colleges' wider safeguarding obligations. Designated safeguarding leads and other senior leaders 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). The guidance is set out in terms of four general themes: risk assessment, working in partnership, staff training, and IT policies.

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<sup>105</sup> As defined in the Government's Counter Extremism Strategy.

<sup>106</sup> As defined in the Revised Prevent Duty Guidance for England and Wales.

<sup>107</sup> 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.

<sup>108</sup> "Terrorism" for these purposes has the same meaning as for the Terrorism Act 2000 (section 1(1) to (4) of that Act).

### **Additional support**

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

There is additional guidance: [Prevent duty guidance: for further education institutions in England and Wales](#) that applies to colleges.

[Educate Against Hate](#), a website launched by the Her Majesty's Government has been developed to support and equip school and college leaders, teachers, and parents with information, tools and resources (including on the promotion of fundamental British values) to help recognise and address extremism and radicalisation in young people. The platform provides information on and access to training resources for teachers, staff and school and college leaders, some of which are free such as Prevent e-learning, via the Prevent Training catalogue.

### **Channel**

Channel is a programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. It provides a mechanism for schools to make referrals if they are concerned that an individual might be vulnerable to radicalisation. An individual's engagement with the programme is entirely voluntary at all stages. Guidance on Channel is available at: [Channel guidance](#), and a Channel awareness e-learning programme is available for staff at: [Channel General Awareness](#).

The school's or college's designated safeguarding lead (and any deputies) should be aware of local procedures for making a Channel referral. As a Channel partner, the school or college may be asked to attend a Channel panel to discuss the individual referred to determine whether they are vulnerable to being drawn into terrorism and consider the appropriate support required.

### **Peer on peer abuse**

Children can abuse other children. This is generally referred to as peer on peer abuse and can take many forms. This can include (but is not limited to): bullying (including cyberbullying); sexual violence and sexual harassment; physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm; sexting and initiation/hazing type violence and rituals.

## Sexual violence and sexual harassment between children in schools and colleges

### Context

Sexual violence and sexual harassment can occur between two children of any age and sex. 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. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and offline (both physical and verbal) and are never acceptable. It is important that all victims are taken seriously and offered appropriate support. Staff should be aware that some groups are potentially more at risk. Evidence shows girls, children with SEND and LGBT children are at greater risk.

Staff should be aware of the importance of:

- making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up;
- not tolerating or dismissing sexual violence or sexual harassment as “banter”, “part of growing up”, “just having a laugh” or “boys being boys”; and
- challenging behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them.

### What is sexual violence and sexual harassment?

#### Sexual violence

It is important that school and college staff are aware of sexual violence and the fact children can, and sometimes do, abuse their peers in this way. When referring to sexual violence we are referring to sexual violence offences under the Sexual Offences Act 2003<sup>109</sup> as described below:

**Rape:** A person (A) commits an offence of rape if: he intentionally penetrates the vagina, anus or mouth of another person (B) with his penis, B does not consent to the penetration and A does not reasonably believe that B consents.

**Assault by Penetration:** A person (A) commits an offence if: s/he intentionally penetrates the vagina or anus of another person (B) with a part of her/his body or

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<sup>109</sup> [legislation.gov.uk](http://legislation.gov.uk)

anything else, the penetration is sexual, B does not consent to the penetration and A does not reasonably believe that B consents.

**Sexual Assault:** A person (A) commits an offence of sexual assault if: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents.

**What is consent?**<sup>110</sup> Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another, e.g. to vaginal but not anal sex or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity and each time activity occurs. Someone consents to vaginal, anal or oral penetration only if s/he agrees by choice to that penetration and has the freedom and capacity to make that choice.<sup>111</sup>

### Sexual harassment

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

Whilst not intended to be an exhaustive list, sexual harassment can include:

- sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names;
- sexual "jokes" or taunting;
- physical behaviour, such as: deliberately brushing against someone, interfering with someone's clothes (schools and colleges should be considering when any of this crosses a line into sexual violence - it is important to talk to and consider the experience of the victim) and displaying pictures, photos or drawings of a sexual nature; and
- online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence.<sup>112</sup> It may include:
  - non-consensual sharing of sexual images and videos;
  - sexualised online bullying;
  - unwanted sexual comments and messages, including, on social media;

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<sup>110</sup> It is important school and college staff (and especially designated safeguarding leads and their deputies) understand consent. This will be especially important if a child is reporting they have been raped. More information: [here](#).

<sup>111</sup> [PSHE Teaching about consent](#) from the PSHE association provides advice and lesson plans to teach consent at Key stage 3 and 4.

<sup>112</sup> [Project deSHAME](#) from Childnet provides useful research, advice and resources regarding online sexual harassment.

- sexual exploitation; coercion and threats; and
- upskirting.

### Upskirting<sup>113</sup>

'Upskirting' typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is now a criminal offence.

### The response to a report of sexual violence or sexual harassment

The initial response to a report from a child is important. It is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

If staff have a concern about a child or a child makes a report to them, they should follow the referral process as set out from paragraph 35 in Part one of this guidance. As is always the case, if staff are in any doubt as to what to do they should speak to the designated safeguarding lead (or a deputy).

### Additional advice and support

Abuse or Safeguarding issue	Link to Guidance/Advice	Source
Abuse	<a href="#">What to do if you're worried a child is being abused</a>	DfE advice
	<a href="#">Domestic abuse: Various Information/Guidance</a>	Home Office
	<a href="#">Faith based abuse: National Action Plan</a>	DfE advice
	<a href="#">Relationship abuse: disrespect nobody</a>	Home Office website
Bullying	<a href="#">Preventing bullying including cyberbullying</a>	DfE advice
	<a href="#">Advice for 5-11-year olds witnesses in criminal courts</a>	MoJ advice

<sup>113</sup> Additional information can be found at [GOV.UK](#).

Abuse or Safeguarding issue	Link to Guidance/Advice	Source
Children and the courts	<a href="#">Advice for 12-17 year old witnesses in criminal courts</a>	MoJ advice
Children missing from education, home or care	<a href="#">Children missing education</a>	DfE statutory guidance
	<a href="#">Child missing from home or care</a>	DfE statutory guidance
	<a href="#">Children and adults missing strategy</a>	Home Office strategy
Children with family members in prison	<a href="#">National Information Centre on Children of Offenders</a>	Bamardo's in partnership with Her Majesty's Prison and Probation Service (HMPPS) advice
Child Exploitation	<a href="#">County Lines: criminal exploitation of children and vulnerable adults</a>	Home Office guidance
	<a href="#">Child sexual exploitation: guide for practitioners</a>	DfE
	<a href="#">Trafficking: safeguarding children</a>	DfE and HO guidance
Drugs	<a href="#">Drugs: advice for schools</a>	DfE and ACPO advice
	<a href="#">Drug strategy 2017</a>	Home Office strategy
	<a href="#">Information and advice on drugs</a>	Talk to Frank website
	<a href="#">ADEPIS platform sharing information and resources for schools: covering drug (&amp; alcohol) prevention</a>	Website developed by Mentor UK
"Honour Based Violence" (so called)	<a href="#">Female genital mutilation: information and resources</a>	Home Office
	<a href="#">Female genital mutilation: multi agency statutory guidance</a>	DfE, DH, and HO statutory guidance
	<a href="#">Forced marriage: statutory guidance and government advice</a>	Foreign Commonwealth Office and Home Office
Health and Well-being	<a href="#">Fabricated or induced illness: safeguarding children</a>	DfE, Department for Health and Home Office
	<a href="#">Rise Above: Free PSHE resources on health, wellbeing and resilience</a>	Public Health England resources
	<a href="#">Medical-conditions: supporting pupils at school</a>	DfE statutory guidance
	<a href="#">Mental health and behaviour</a>	DfE advice
Homelessness	<a href="#">Homelessness: How local authorities should exercise their functions</a>	MHCLG

Abuse or Safeguarding issue	Link to Guidance/Advice	Source
Online	<a href="#">Sexting: responding to incidents and safeguarding children</a>	UK Council for Child Internet Safety
Private fostering	<a href="#">Private fostering: local authorities</a>	DfE - statutory guidance
Radicalisation	<a href="#">Prevent duty guidance</a>	Home Office guidance
	<a href="#">Prevent duty advice for schools</a>	DfE advice
	<a href="#">Educate Against Hate Website</a>	DfE and Home Office
Violence	<a href="#">Gangs and youth violence: for schools and colleges</a>	Home Office advice
	<a href="#">Ending violence against women and girls 2016-2020 strategy</a>	Home Office strategy
	<a href="#">Violence against women and girls: national statement of expectations for victims</a>	Home Office guidance
	<a href="#">Sexual violence and sexual harassment between children in schools and colleges</a>	DfE advice
	<a href="#">Serious violence strategy</a>	Home Office Strategy