



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, September 2022), 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;
- Ensure all staff have a responsibility to provide a safe environment in which students can learn

*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 physical, emotional and mental 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, sexual harassment, harassment 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, September 2022).

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 and to understand that an issue not being reported does not mean an issue is not happening. We will ensure that all staff working in all parts of the College understand their personal responsibilities and have access to the Senior Designated Safeguarding Lead. The Senior Designated Safeguarding 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
- that young people and vulnerable adults may not feel ready or know how to tell someone they are being abused
- how to respond to a disclosure from a young person or vulnerable adult
- how to record and report this information. This information is clearly identified via the Safeguarding and Wellbeing Referral Flowchart (safeguarding handbook in shared drive)) which highlights the difference in response to a non-urgent concern and a concern which involves immediate risk of harm. Regular visitors (expected to visit more than once in an academic year) 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 Careers and Wellbeing 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.

- 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, Amended December 2020).
- 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.
- 2.8 East Coast College recognises that some safeguarding scenarios may disproportionately impact those with particular protected characteristics and the importance of trusted adults in supporting disclosures. The College also recognises that positive action may be required to support students with protected characteristics or perceived protected characteristics such as LGBTQ+ students.

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 2022).
- 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's IT system has appropriate filters and monitoring systems in place to limit exposure to online risks and that this is regularly reviewed
The College contributes to inter-agency working in line with *'Working Together to Safeguard Children'* (HM Government, Amended December 2020);
 - 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 Senior Designated Safeguarding 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, including governors, receive a safeguarding induction and are provided with a copy of this policy, a copy of Part 1 of 'Keeping Children Safe in Education' (DfE, September 2021) and the staff code of conduct;
- All staff, including governors, 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 2022);
- 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 but will highlight trends and areas of focus

The Principal

3.5 The Principal is responsible for:

- Identifying a member of the senior leadership team to be the Senior Designated Safeguarding Lead (Keeping Children Safe In Education, DfE, September 2022) 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 Senior Designated Safeguarding Lead does this when the Deputy Principal is not available. The Head of People and Wellbeing Team will be kept informed by the Deputy Principal or Senior Designated Safeguarding Lead at all stages
- Acting as Designated Lead in the absence of the Senior Designated Safeguarding Lead (Assistant Principal for Student Wellbeing and Support) and Safeguarding Co-ordinator.

The Senior Designated Safeguarding Lead

3.7 The Senior Designated Safeguarding Lead will carry out their role in accordance with the responsibilities outlined in of 'Keeping Children Safe in Education' (DfE, September 2022). The Senior Designated Safeguarding 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 Senior Designated Safeguarding Lead or designated member of the safeguarding and wellbeing team who will consider the context of the concern.

- 3.8 The Senior Designated Safeguarding 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 Senior Designated Safeguarding 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. They will also contribute to partner consultations regarding commissioning of local services around safeguarding.
- 3.9 The Senior Designated Safeguarding Lead will ensure written records and safeguarding files are maintained and that they are kept confidentially, centrally and stored securely.
- 3.10 The Senior Designated Safeguarding 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 Senior Designated Safeguarding 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 Senior Designated Safeguarding 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.
- 3.13 The Senior Designated Safeguarding Lead will also be the College's senior mental health lead.

The Designated Safeguarding Co-ordinator

3.14 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 Appropriate Adult if police are required to speak to a child on college premises

- Acting as Deputy Designated Lead in the absence of the Senior Designated Safeguarding 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 2022) along with the staff code of conduct and told who our Senior Designated Safeguarding 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 2022) 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 Senior Designated Safeguarding Lead. A minimum of annual safeguarding training will also take place on current themes, legislative changes, PREVENT and online 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 Senior Designated Safeguarding 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 Senior Designated Safeguarding Lead and the safeguarding and wellbeing team members will attend Senior Designated Safeguarding 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 in line with '*Keeping Children Safe in Education*' (DfE, September 2022) including:

- PREVENT;
- extra-familial abuse such as Child Sexual and Criminal Exploitation (e.g. County Lines) or serious youth violence;
- intra-familial abuse such as sexual or physical abuse, either current or historical;
- so called 'Honour-based' abuse such as Female Genital Mutilation, Forced Marriage, conversion therapies and practices such as breast ironing;
- Domestic abuse, control and coercion and the impact of this either witnessing this or in intimate relationships;
- The Senior Designated Safeguarding 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 Senior Designated Safeguarding 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 in line with the local multi-agency safeguarding arrangements, 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 local multi-agency safeguarding arrangements. 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 multi-agency safeguarding partners 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 local multi-agency safeguarding partners 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.
- 5.13 It is noted that those with SEND are more likely to experience some forms of abuse or harassment. Where appropriate, members of the safeguarding and wellbeing team will work with other curriculum and support staff to ensure communication and other needs are met while managing a safeguarding concern for a student with SEND.

6 Procedures for managing allegations of sexual violence, domestic abuse and harassment including child-on-child.

- 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 children the College will follow the protocols laid out in '*Keeping Children Safe in Education* (DfE, September 2022) and '*When To Call The Police: Guidance for School and Colleges*' (NPCC, 2020). Examples of sexual violence or sexual harassment could include, but are not limited to, physical contact without consent, sexualized language, jokes or comments relating to

an individual's alleged sexual activity. Sexual harassment may also include misogyny or misandry.

- 6.2 Actions taken 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 alleged perpetrator.
- 6.3 Allegations of child-on-child 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. It is noted that support for an alleged perpetrator can happen concurrently with investigations and disciplinary procedures.
- 6.4 The College's Careers and Wellbeing 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.
- 6.5 In line with the Voyeurism (Offences) Act 2019 instances of 'upskirting' will be viewed as sexually harmful behavior and criminal.
- 6.6 It is noted that those witnessing sexual violence or harassment may also be impacted and support will be made available via college and partner support systems.
- 6.7 With all safeguarding disclosures and particularly those relating to sexual violence and sexual harassment we must ensure that students feel reassured that they are being taken seriously and are being supported to keep safe.
- 6.8 We recognise that Domestic abuse, control and coercion can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional. Children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn

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 Senior Designated Safeguarding 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.

- 7.3 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. Copies of electronically completed paperwork such as search records or action plans will be uploaded to student E-ILPs unless deemed by the student/completing staff member that content is sensitive. In these instances they will be sent by email as a password protected document to the email address agreed by the student.
- 7.4 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, Amended December 2020). Consent for sharing this information will be gained wherever possible.
- 7.5 When a young person or vulnerable adult leaves the College, the Senior Designated Safeguarding Lead will make contact with the Senior Designated Safeguarding 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.
- 7.6 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, those who currently require social worker support Young Carers under 25, carers of those with an additional need aged 25 or over, those who disclose they are adopted, those with a mental health support need, students accessing Free College Meals and those with Educational Health Care Plans, disabilities, SEND, certain health conditions or are accessing High Needs funding.
- 7.7 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. The college provides enrolment updates to local authorities.

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 Senior Designated Safeguarding Lead making a referral to multi-agency safeguarding partners 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

8.6 As part of ongoing communication with parents and carers East Coast College will share information and advice to support parents and carers with ensuring their child's online safety when not at college.

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 2022).

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 Shortlisted candidates will be asked to self-declare information such as criminal records or other information which may make them unsuitable to work at the College. In line with 'Keeping Children Safe in Education' (DfE, 2022) this information will not be requested at application stage. In addition, the college reserves the right to conduct an online search of information in the public domain for shortlisted candidates to help identify any incidents or issues that have happened which the school or college might want to explore with the applicant at interview.

10.4 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 Senior Designated Safeguarding Lead.

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

10.6 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.

10.7 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 2022).

10.8 Where East Coast College is facilitating or supporting industrial placements, the Industrial Placement Policy and Procedure will be followed. If industrial placements require DBS checks, East Coast College will support students to complete these. Where students disclose unspent criminal convictions the Safer Learning for All procedure is followed.

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. It will also be confirmed that the booking person or organization has appropriate safeguarding policies and procedures in place. Any concerns will be raised with the Senior Designated Safeguarding 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 including agency staff, volunteers and contractors

- 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 2022) 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 2022), 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 Director of People and Wellbeing or deputy in their absence, who will appoint an investigating officer. Should an allegation be made against the Director of People and Wellbeing, this will be reported to the Principal. In the event that the Principal is not contactable on that day, the information must be passed to and dealt with by the Director of Governance. Should an allegation be made against a member of the Governing Body, this will be reported to the Director of Governance. In the event that the Director of Governance is not contactable on that day, the information must be passed to and dealt with by the Director of People and Wellbeing.

12.4 Concerns may include that a staff member or volunteer including agency staff has:

- behaved in a way that has harmed a child or vulnerable adult or may have harmed a child or vulnerable adult;
- possibly committed a criminal offence against or related to a child or vulnerable adult;
- behaved towards a child or vulnerable adult in a way that indicated they may pose a risk of harm to children or vulnerable adults;
- behaved or may have behaved in a way that indicates they may not be suitable to work with children

12.5 The Senior Designated Safeguarding 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.

12.6 Where the allegation involves an agency/contracted member of staff the Director of People and Wellbeing will liaise with the agency/contractor manager in line with Keeping Children Safe in Education (September 2022)

12.7 Where the concern is 'low level' and does not meet threshold of harm for referral to the LADO a record should be made of this and retained alongside the individual's personnel records. If required a consultation can be completed with the LADO team to confirm next steps. This may be the result of an individual concern or cumulative concerns. Patterns will be reviewed to identify wider concerns and/or training needs.

12.8 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 01603223473 (Norfolk). Advice can be gained from the NSPCC Whistleblowing Advice line on 0800 028 0285 or help@nspcc.org.uk.

12.9 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.

12.10 The College seeks to create an environment where staff are encouraged and feel confident self-referring for support if they feel they have been in a situation which could be misinterpreted, viewed as compromising or they have reflected does not meet expected professional standards.

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 2022) and Further Education Residential Accommodation: National Minimum Standards (September 18).

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 Policy;
- Health, Safety and Wellbeing Policy;
- First aid Policy;
- Industry placement Policy and Procedure;
- Student Bullying and Harassment Policy and Procedure
- SEND Policy;
- IT Acceptable Use Policy;
- E-resources Acceptable Use Policy;
- Procedure for Video Conferencing and Webinars;
- Procedure for use of Social Media in learning;
- Visitor Policy inc. external speaker procedure
- Procedure for Live Streaming;
- Equality, Diversity and Inclusion Policy

15 Statutory framework

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

- 'Working Together to Safeguard Children' (HM Government, Amended December 2020);
- 'Keeping Children Safe in Education' (DfE, September 2022);
- '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, September 2021);
- 'Multi-agency Statutory Guidance on Female Genital Mutilation' (HM Government, July 2020);
- '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, February 2020);
- 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)
- Voyeurism (Offences) Act 2019
- 'When to call the police: Guidance for Schools and Colleges' (National Police Chiefs Council)
- Human Rights Act 1998
- Equality Act 2010
- Public Sector Equality Duty

Part one: Safeguarding information for all staff

What school and college staff should know and do

A child centred and coordinated approach to safeguarding

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

The role of school and college staff

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

8. **All** staff should be prepared to identify children who may benefit from early help.⁴ Early help means providing support as soon as a problem emerges at any/’ point in a child’s life, from the foundation years through to the teenage years.

9. **Any staff member** who has **any** concerns about a child’s welfare should follow the processes set out in paragraphs 51-67. Staff should expect to support social workers and other agencies following any referral.

10. **Every** school and college should have a designated safeguarding lead who will provide support to staff to carry out their safeguarding duties and who will liaise closely with other services such as local authority children’s social care.

11. The designated safeguarding lead (and any deputies) are most likely to have a complete safeguarding picture and be the most appropriate person to advise on the response to safeguarding concerns.

12. The Teachers’ Standards 2012 state that teachers (which includes headteachers) should safeguard children’s wellbeing and maintain public trust in the teaching profession as part of their professional duties.⁵

What school and college staff need to know

13. **All** staff should be aware of systems within their school or college which support safeguarding, and these should be explained to them as part of staff induction. This should include the:

- child protection policy (which should amongst other things also include the policy and procedures to deal with child-on-child abuse)
- behaviour policy (which should include measures to prevent bullying, including cyberbullying, prejudice-based and discriminatory bullying)⁶
- staff behaviour policy (sometimes called a code of conduct) should amongst other things, include low- level concerns, allegations against staff and whistleblowing
- safeguarding response to children who go missing from education, and

⁴ Detailed information on early help can be found in Chapter 1 of [Working Together to Safeguard Children](#).

⁵ The [Teachers' Standards](#) apply to: trainees working towards QTS; all teachers completing their statutory induction period (newly qualified teachers [NQTs]); and teachers in maintained schools, including maintained special schools, who are subject to the Education (School Teachers’ Appraisal) (England) Regulations 2012.

⁶ All schools are required to have a behaviour policy (full details are [here](#)). If a college or chooses to have a behaviour policy it should be provided to staff as described above.

- role of the designated safeguarding lead (including the identity of the designated safeguarding lead and any deputies).

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

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

15. **All** staff should be aware of their local early help process and understand their role in it.

16. **All** staff should be aware of the process for making referrals to local authority children's social care and for statutory assessments⁷ under the Children Act 1989, especially section 17 (children in need) and section 47 (a child suffering, or likely to suffer, significant harm) that may follow a referral, along with the role they might be expected to play in such assessments.

17. **All** staff should know what to do if a child tells them they are being abused, exploited, or neglected. Staff should know how to manage the requirement to maintain an appropriate level of confidentiality. This means only involving those who need to be involved, such as the designated safeguarding lead (or a deputy) and local authority children's social care. Staff should never promise a child that they will not tell anyone about a report of any form of abuse, as this may ultimately not be in the best interests of the child.

18. **All** staff should be able to reassure victims that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting **any** form of abuse and/or neglect. Nor should a victim ever be made to feel ashamed for making a report.

19. **All staff** should be aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. For example, children may feel embarrassed, humiliated, or being threatened. This could be due to their vulnerability, disability and/or sexual orientation or language barriers. This should not prevent staff from having a professional curiosity and speaking to the DSL if they have concerns about a child. It is

⁷ Detailed information on statutory assessments can be found in Chapter 1 of [Working Together to Safeguard Children](#)

also important that staff determine how best to build trusted relationships with children and young people which facilitate communication.

What school and college staff should look out for

Early help

20. **Any** child may benefit from early help, but all school and college staff should be particularly alert to the potential need for early help for a child who:

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

Abuse and neglect

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

22. **All** school and college staff should be aware that abuse, neglect and safeguarding issues are rarely standalone events and cannot be covered by one definition or one label alone. In most cases, multiple issues will overlap with one another.

23. **All** staff, but especially the designated safeguarding lead (and deputies) should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual abuse (including harassment and exploitation), domestic abuse in their own intimate relationships (teenage relationship abuse), criminal exploitation, serious youth violence, county lines, and radicalisation.

24. **All** staff should be aware that technology is a significant component in many safeguarding and wellbeing issues. Children are at risk of abuse and other risks online as well as face to face. In many cases abuse and other risks will take place concurrently both online and offline. Children can also abuse other children online, this can take the form of abusive, harassing, and misogynistic/misandrist messages, the non-consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography, to those who do not want to receive such content.

25. **In all cases, if staff are unsure, they should always speak to the designated safeguarding lead or deputy.**

Indicators of abuse and neglect

26. **Abuse:** a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children.

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

28. **Emotional abuse:** the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate

expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning or preventing the child from participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

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

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

Safeguarding issues

31. **All** staff should have an awareness of safeguarding issues that can put children at risk of harm. Behaviours linked to issues such as drug taking and/or alcohol misuse, deliberately missing education, serious violence (including that linked to county lines), radicalisation and consensual and non-consensual sharing of nude and semi-nude

images and/or videos⁸ can be signs that children are at risk. Below are some safeguarding issues all staff should be aware of. **Additional information on these safeguarding issues and information on other safeguarding issues is included in Annex B.**

Child-on-child abuse

32. **All** staff should be aware that children can abuse other children (often referred to as child-on-child abuse), and that it can happen both inside and outside of school or college and online. **All** staff should be clear as to the school's or college's policy and procedures with regard to child-on-child abuse and the important role they have to play in preventing it and responding where they believe a child may be at risk from it.

33. **All** staff should understand that even if there are no reports in their schools or colleges it does not mean it is not happening, it may be the case that it is just not being reported. As such it is important if staff have **any** concerns regarding child-on-child abuse they should speak to their designated safeguarding lead (or deputy).

34. It is essential that **all** staff understand the importance of challenging inappropriate behaviours between children, many of which are listed below, that are abusive in nature. Downplaying certain behaviours, for example dismissing sexual harassment as "just banter", "just having a laugh", "part of growing up" or "boys being boys" can lead to a culture of unacceptable behaviours, an unsafe environment for children and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it.

35. Child-on-child abuse is most likely to include, but may not be limited to:

- bullying (including cyberbullying, prejudice-based and discriminatory bullying)
- abuse in intimate personal relationships between children (sometimes known as 'teenage relationship abuse')
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
- sexual violence,⁹ such as rape, assault by penetration and sexual assault; (this may include an online element which facilitates, threatens and/or encourages sexual violence)

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

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

- sexual harassment,¹⁰ such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- consensual and non-consensual sharing of nude and semi-nude images and/or videos¹¹ (also known as sexting or youth produced sexual imagery)
- upskirting,¹² which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or alarm, and
- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

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

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

Child Criminal Exploitation (CCE)

37. Some specific forms of CCE can include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting, or pickpocketing. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others.

38. Children can become trapped by this type of exploitation, as perpetrators can threaten victims (and their families) with violence or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others. As children involved in criminal exploitation often commit crimes themselves, their vulnerability as victims is not always recognised by adults and professionals, (particularly older children), and they are not treated as victims

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

¹¹ UKCIS guidance: [Sharing nudes and semi-nudes advice for education settings](#)

¹² For further information about 'upskirting' see Annex B.

despite the harm they have experienced. They may still have been criminally exploited even if the activity appears to be something they have agreed or consented to.

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

Child Sexual Exploitation (CSE)

40. CSE is a form of child sexual abuse. Sexual abuse may involve physical contact, including assault by penetration (for example, rape or oral sex) or nonpenetrative acts such as masturbation, kissing, rubbing, and touching outside clothing. It may include non-contact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse including via the internet.

41. CSE can occur over time or be a one-off occurrence, and may happen without the child's immediate knowledge for example through others sharing videos or images of them on social media.

42. CSE can affect any child who has been coerced into engaging in sexual activities. This includes 16 and 17 year olds who can legally consent to have sex. Some children may not realise they are being exploited for example they believe they are in a genuine romantic relationship.

Domestic Abuse

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

Female Genital Mutilation (FGM)

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

duty on teachers.¹³ If a teacher, in the course of their work in the profession, discovers that an act of FGM appears to have been carried out on a girl under the age of 18, the teacher **must** report this to the police.

Mental Health

45. **All** staff should be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

46. Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Education staff, however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one. Schools and colleges can access a range of advice to help them identify children in need of extra mental health support, this includes working with external agencies.

47. If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following their child protection policy, and speaking to the designated safeguarding lead or a deputy.

Serious violence

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

Additional information and support

49. Departmental advice [What to Do if You Are Worried a Child is Being Abused - Advice for Practitioners](#) provides more information on understanding and identifying abuse and neglect. Examples of potential indicators of abuse and neglect are highlighted throughout the advice and will be particularly helpful for school and college staff. The [NSPCC](#) website also provides useful additional information on abuse and neglect and what to look out for.

50. **Annex B** contains important additional information about specific forms of abuse

¹³ 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).

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

51. Staff working with children are advised to maintain an attitude of **'it could happen here'** where safeguarding is concerned. When concerned about the welfare of a child, staff should always act in the **best** interests of the child.

52. If staff have **any concerns** about a child's welfare, they should act on them **immediately**. See page 22 for a flow chart setting out the process for staff when they have concerns about a child.

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

54. Options will then include:

- managing any support for the child internally via the school's or college's own pastoral support processes
- undertaking an early help assessment,¹⁴ or
- making a referral to statutory services,¹⁵ for example as the child might be in need, is in need or suffering, or is likely to suffer harm.

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

56. Staff should not assume a colleague, or another professional will take action and share information that might be critical in keeping children safe. They should be mindful

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

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

social care.

that early information sharing is vital for the effective identification, assessment, and allocation of appropriate service provision, whether this is when problems first emerge, or where a child is already known to local authority children's social care (such as a child in need or a child with a protection plan). [Information Sharing: Advice for Practitioners Providing Safeguarding Services to Children, Young People, Parents and Carers](#) supports staff who have to make decisions about sharing information. This advice includes the seven golden rules for sharing information and considerations with regard to the Data Protection Act 2018 (DPA) and UK General Data Protection Regulation (UK GDPR).

57. DPA and UK GDPR **do not** prevent the sharing of information for the purposes of keeping children safe and promoting their welfare. If in any doubt about sharing information, staff should speak to the designated safeguarding lead or a deputy. Fears about sharing information **must not** be allowed to stand in the way of the need to safeguard and promote the welfare of children.

Early help assessment

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

Statutory children's social care assessments and services

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

60. Local authority children's social care assessments should consider where children are being harmed in contexts outside the home, so it is important that schools and colleges provide as much information as possible as part of the referral process. This will allow any assessment to consider all the available evidence and enable a contextual approach to address such harm. Additional information is available here: [Contextual Safeguarding](#).

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

Children in need

62. A child in need is defined under the Children Act 1989 as a child who is unlikely to

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

Children suffering or likely to suffer significant harm:

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

What will the local authority do?

64. Within one working day of a referral being made, a local authority social worker should acknowledge its receipt to the referrer and make a decision about the next steps and the type of response that is required. This will include determining whether:

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

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

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

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

Record keeping

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

Records should include:

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

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

Why is all of this important?

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

- failing to act on and refer the early signs of abuse and neglect
- poor record keeping
- failing to listen to the views of the child
- failing to re-assess concerns when situations do not improve
- not sharing information with the right people within and between agencies
- sharing information too slowly, and
- a lack of challenge to those who appear not to be taking action.

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

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

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

72. If staff have safeguarding concerns or an allegation is made about another member of staff (including supply staff, volunteers, and contractors) **posing a risk of harm 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, or a situation where there is a conflict of interest in reporting the matter to the headteacher, this should be reported directly to the local authority designated officer(s) (LADOs). Details of your local LADO should be easily accessible on your local authority's website.

73. If staff have a safeguarding concern or an allegation about another member of staff (including supply staff, volunteers or contractors) that **does not** meet the harm threshold, then this should be shared in accordance with the school or college low-level concerns policy. Further details can be found in Part four of this guidance.

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

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

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

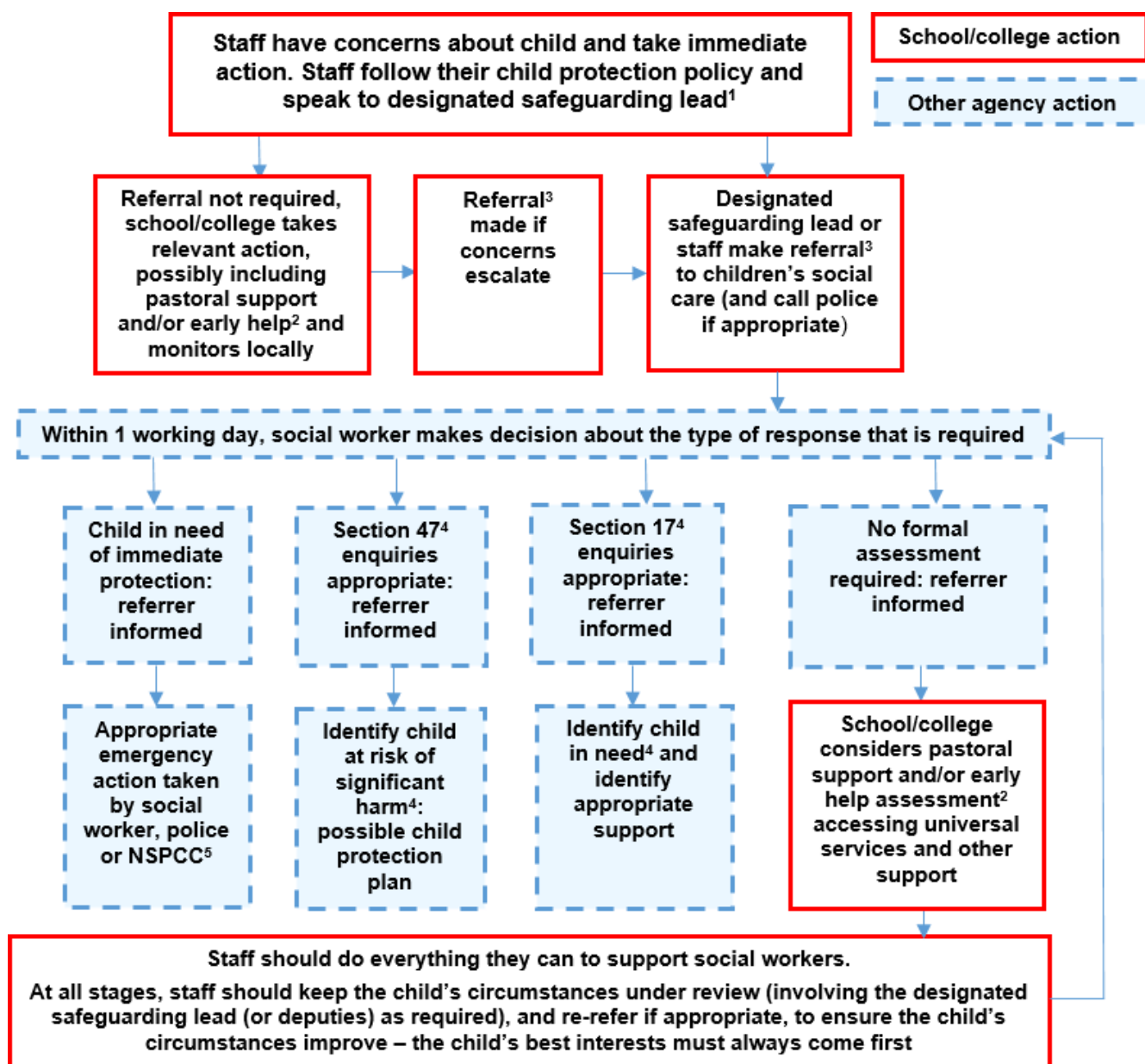
76. Where a staff member feels unable to raise an issue with their employer, or feels that their genuine concerns are not being addressed, other whistleblowing channels are open to them:

- general guidance on whistleblowing can be found via: [Advice on Whistleblowing](#)
- the [NSPCC's what you can do to report abuse dedicated helpline](#) is available as an alternative route for staff who do not feel able to raise concerns regarding child protection failures internally, or have concerns about the way a concern is being

handled by their school or college. Staff can call 0800 028 0285 – line is available from 8:00 AM to 8:00 PM, Monday to Friday and email: help@nspcc.org.uk.¹⁷

¹⁷ 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).