Safeguarding & Child Protection Policy 2022/23

WINDSOR
FOREST
COLLEGES GROUP

Our Mission

Inspire ambition and make a positive difference to lives through learning.

Our Values

Learners First - placing the learner at the heart of all we do

Community - working collaboratively to achieve

Empowering - enabling all in a caring environment to achieve their full potential

Excellence - a culture of creativity, high expectations, ambition and aspiration

Diversity - celebrating diversity and inclusivity as a key to our success

Integrity - honesty, openness and trust at the heart of College life

Respect - showing fairness, courtesy and mutual respect

Safeguarding & Child Protection Policy

Contents

1. POLICY OUTLINE

1.1 This Policy sets out the Windsor Forest Colleges Group's (TWFCG)[1] overarching vision and commitment to safeguarding and child protection.

1.2 It describes our statutory duties, the legislative framework in which we operate and our expectations of staff and stakeholders to ensure appropriate and timely action is taken in the event of the disclosure of abuse.

1.3 The Policy includes the College Group's position on the delivery and implementation of the Prevent Duty, which includes Fundamental British Values.

1.4 The policy includes the College Group's position on the expectations of staff in relation to child on child abuse and on the support of children and vulnerable adults who have been abused

2. POLICY STATEMENT

2.1 The College Group commits to provide a learning environment where everyone can learn, develop and progress effectively. This includes taking action to ensure all our students, but particularly children and vulnerable adults, feel safe and secure, know how to request and receive effective help if they are in danger, and learn how to keep themselves safe (including online). The College group ensures a whole-college approach to safeguarding, aiming always to put safeguarding and Child Protection at the forefront of our work.

2.2 Additionally:

2.2.1 Safeguarding is recognised as everyone's responsibility. All staff, governors, volunteers, students, employers, and other stakeholders should play their full part in keeping children, vulnerable adults and the wider college community safe.

2.2.2 The College takes appropriate action to ensure all members of the college community stay safe during their time with us, including during offsite college-related activities, apprenticeships, industry placements and work experience. Additionally, the College aims to equip students to keep themselves safe outside of College and at home to ensure they have the best possible life and educational outcomes.

2.2.3 Everyone who comes into regular contact with children and vulnerable adults through the College Group is subject to employment checks and training, appropriate to their level of role and responsibility.

2.2.4 All staff, students and wider College users have a clear understanding of abuse and neglect in all forms; including how to identify, respond and report. This includes knowledge of the process for allegations against professionals.

2.2.5 Students, staff, Governors, and volunteers are confident that they can report all matters of a safeguarding nature to the safeguarding team, where the information will be acted upon

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[1] TWFCG are Strode's College, Windsor College, Langley College, and Berkshire College of Agriculture

swiftly and securely, following the correct procedures with the safety and wellbeing of the students at the centre of the referral process.

2.2.6   The College Group recognises that COVID 19 is an on-going consideration which is highly relevant to our safeguarding practice. Therefore, this policy and the associated procedures may need to change to account for circumstances that are as yet unknown (for example, future lockdowns, changes to how we open and use our colleges, the ways in which we deliver our safeguarding services and how we contribute to the safety of students who are working remotely, self-isolating or nervous about attending in person).

2.2.7   The College may choose to change, revoke or add to this policy and the procedures in order to keep our students safe in new circumstances dictated by arrangements required to manage risks around the ongoing pandemic. Any changes will be approved by the senior leadership team and the board of governors. The most recent versions, containing any such changes will be available on the staff intranet and the college website. Where appropriate, staff, contractors and students will be notified directly of changes in year.

3.   SCOPE

3.1   TWFCG has a statutory and moral duty to ensure that it safeguards and promotes the welfare of all College users but in particular the children and vulnerable adults, who receive education and training through the College Group.

3.2   This Safeguarding and Child Protection Policy applies to all staff, students, apprentices, and other College users; including volunteers, external contractors, and employers who take students for any form of work-based learning or work experience.

3.3   The Policy should be read in conjunction with the WFCG Safeguarding Procedures (2022-23) which give details of how the College manages Safeguarding and Child Protection disclosures and concerns.

3.4   Throughout the Policy and Procedures, reference is made to College students. This term is used to refer to all students but with particular reference to those under the age of 18 years (children) and vulnerable adults.

3.5   A vulnerable adult refers to any person over the age of 18 who amongst other indicators:

● Is or may be in need of community care services by reason of mental or other disability, age or illness.
● Is or may be unable to take care of himself or herself.
● Is or may be unable to protect himself or herself against significant harm or serious exploitation.

3.6   Our commitment to safeguarding is underpinned by the following legislation and guidance: Department for Education statutory guidance 'Keeping Children Safe in Education' (September 2022).

● Working Together to Safeguard Children' (2018).
● The Counter Terrorism and Security Act (2015).
● The Prevent Duty Guidance for further education institutions in England and Wales updated April 2021 (Department for Education).

- Serious Crime Act and the mandatory reporting of female genital mutilation (FGM) October (2015).
- The Anti-Social Behaviour, Crime and Policing Act (2014).
- The online procedures maintained by the relevant Local Safeguarding Partnerships for each of our individual sites.
- Guide to the General Data Protection Regulation (GDPR) March 2018
- COVID-19 Guidance https://www.gov.uk/coronavirus
- Serious Violence Duty (due 2022)
- Equality Act 2010
- Legislation surrounding the safeguarding of vulnerable adults

4.   POLICY DETAILS

4.1   The College Group provides a safe, non-threatening, inclusive environment in which all College users can operate and learn in an environment where they are treated with respect and dignity, feel safe, are listened to, where account is taken of their wishes and feelings and where positive well-being is promoted. Through the provision of this environment, the College Group aims to develop students and staff who are confident, healthy, safe and emotionally resilient.

4.2   The College group promotes a child-centred approach to disclosure and reporting, ensuring students and staff feel safe and confident to make disclosures and raise concerns

4.3   The College Group focus is on minimising the risk of harm to children and vulnerable adults, including the recognition of peer-on-peer abuse, and responding to this with the same commitment as with any other form of abuse. Staff will always act in the best interest of the students when responding to welfare concerns and will maintain an attitude of *"it could happen here"* where safeguarding is concerned.

4.4   The College Group is an intrinsic part of local communities and, as such, has strong relationships with external agencies. This includes Local Safeguarding Children's Partnerships' and Local Prevent Committees and delivery boards. These relationships allow the College to address local and national safeguarding priorities as well as accessing support to manage and reduce potential conflict within the College and help different groups of people to respect each other and celebrate difference.

4.5   The safeguarding teams within the Colleges recognise the importance of contextual safeguarding and of working with the police and other partners to understand the communities in which we are situated. It is also recognised that safeguarding practice, conversations, training, and learning must be flexible in order to respond to local concerns and emerging topics that impact on children and vulnerable adults. The College Group actively promotes Fundamental British Values in all of our work and gives our students the opportunity to mix and learn with, from, and about those from different backgrounds. (See Section 6 Radicalisation and the Prevent Duty).

4.6   The College is committed to delivering a safe online environment and promoting/supporting online safety. Using technology is an essential part of modern life but can present risks if people are not supported to recognise dangers and develop safety strategies. Information about the risks associated with online activity are embedded in the College mandatory safeguarding training for students and staff. Staff are also given guidance on how to conduct

themselves professionally online, both on behalf of themselves and on behalf of the organisation, through training, a regular cross-college safeguarding bulletin and dedicated guidance.

4.7   The College Corporation takes seriously its role in overseeing the College Group's arrangements for safeguarding and has a nominated Corporation member with lead responsibility for safeguarding.

4.8   Implementation

4.8.1   The College will ensure that:

- All new employees of the College, including apprentices and volunteers. will be subject to an Enhanced Disclosure via the Disclosure and Barring Service (DBS). Arrangements for this are set out in the Recruitment & Selection Policy and Procedure
- Staff are introduced to safeguarding practice and to the policy and procedures via a range of development activities, including online courses, safeguarding training sessions, written briefings and cross-college team meetings. This supports an on-going dialogue around safeguarding, Prevent, British Values and related procedures, policies, and practices. As a result, they are confident to identify and report abuse[2] in line with the safeguarding referral procedures.
- Procedures are in place to support all College users, particularly vulnerable groups of children e.g., looked-after children, children who are themselves carers, children on Child Protection or Child in Need plans, those with mental health challenges and students with additional learning difficulties and/or disabilities.
- Information technologies are used to guarantee that policies and procedures are accessible to all College users.
- ICT Acceptable Use policies are in place across the College Group. Internet usage by students and staff is proactively monitored (via keyword triggers) in order to detect any material promoting terrorism or posing a risk of radicalisation. Any concerns of this nature are managed by the safeguarding team with usual safeguarding/Prevent Duty reporting procedures applying.
- All staff, including Corporation members, volunteers, and people on work placement, should display or carry their official College photo ID badge on the relevant lanyard/holder at all times. This allows all College users to feel confident that they are in a safe environment and assists managers and security teams to identify and deal with any unauthorised visitors.
- Appropriate work is done to keep up to date, and work with the policies, procedures and working practices of the three safeguarding partners across all catchment areas. Relevant representation is in place in local networks, safeguarding partnerships and multiagency training events and projects

4.9   Communication

4.9.1   Procedures are communicated to all staff through staff induction, staff briefings and the staff bulletin, staff intranet, email, meetings, training, and refresher training.

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[2] Definitions of abuse are set out in the WFCG Safeguarding Procedures 2021-22 document

4.9.2   The College convenes a Safeguarding Steering Group as required to ensure the ongoing monitoring, development, and continuous improvement of the College Group's approach to safeguarding its users and implementing the Prevent Duty. This includes the monitoring of the College Group's Safeguarding and Prevent Action Plans. This group reviews safeguarding reports and data on a College Group basis and recommends actions accordingly. Safeguarding leads holds regular meetings with the safeguarding teams and other relevant staff on each College site

4.9.3   Staff and students' views are regularly sought regarding their safety at College/in the workplace through learner representative structures, surveys and discussion activity.

4.9.4   Job adverts have a clear statement reflecting the importance that the College places on safeguarding, and safer recruitment practices are always followed.

4.9.5   Safeguarding literature for staff and students promotes safeguarding across the College and beyond.

4.9.6   Opportunities are taken to teach students about safeguarding, including online safety, through induction, online courses, and activities as part as pastoral arrangements.

4.9.7   All employers are given access to the full College Safeguarding Policy and Safeguarding Procedures.

4.9.8   All students are actively encouraged to report any safeguarding, health and welfare issues through a planned and promoted self-referral process which is advertised across the College.

4.10   Radicalisation and the Prevent Duty

4.10.1 The College recognises the positive contribution it makes towards protecting students and staff from radicalisation and violent/hateful extremism through the implementation of the Prevent Duty. The College will work with students and staff to create communities that are cohesive, strong and joined by shared and understood values. It will put in place robust processes for supporting any learner who is identified as being at risk of radicalisation. All staff are required to understand and take forward British Values in line with the College values and in all of their work

4.10.2 The College's Safeguarding Procedures (2022-23) set out in more detail the College's position on Prevent, including the implementation of learning and teaching on Fundamental British Values (FBV) and specific actions we will take to implement the Prevent Duty.

4.11   Child on Child Abuse

4.11.1 The College Group recognises that child on child abuse is likely to be taking place in our colleges, even if it is not immediately visible or evident.

4.11.2 The College Group has a zero-tolerance approach to child on child abuse and employs a whole-college, child-focussed approach to creating and maintaining a culture that does not leave room for this abuse to take place.

4.11.3 Staff will be trained and reminded to spot the signs of child on child abuse and encouraged to reflect on their own biases and experiences to ensure that they are able to spot the signs that might indicate a concern, and to ensure that they are not downplaying relevant behaviours between young people and are challenging those behaviours where they arise.

4.11.4 See appendix I for more information, definitions and detailed expectations around staff actions

4.12   Serious Violence

4.12.1 The College Group recognises via experience, police intelligence and liaison with partner organisations that there are always likely to be significant numbers of young people within our colleges who have been affected by serious violence, directly or indirectly, in their communities.

4.12.2 The College Group and the safeguarding teams within it will work with the appropriate government guidance to support students in this position, to risk assess applicants to ensure we can keep them safe in our colleges and keep safe the wider college community.

4.12.3 The College Group will also work closely with the police to share information and to understand incidents and community issues that may impact on the college and its students and may expose to harm the college community

4.13   Responding to Safeguarding issues in our local Communities

4.13.1 The College Group is committed to responding appropriately and in a timely fashion to issues that affect the safety of our local communities and impact on our student groups, particularly the children studying in our colleges.

4.13.2 On occasions we will choose to change our curriculum or implement proactive unplanned activities to address local issues of concern, or to provide additional reassurance or education around a specific subject. This might include:
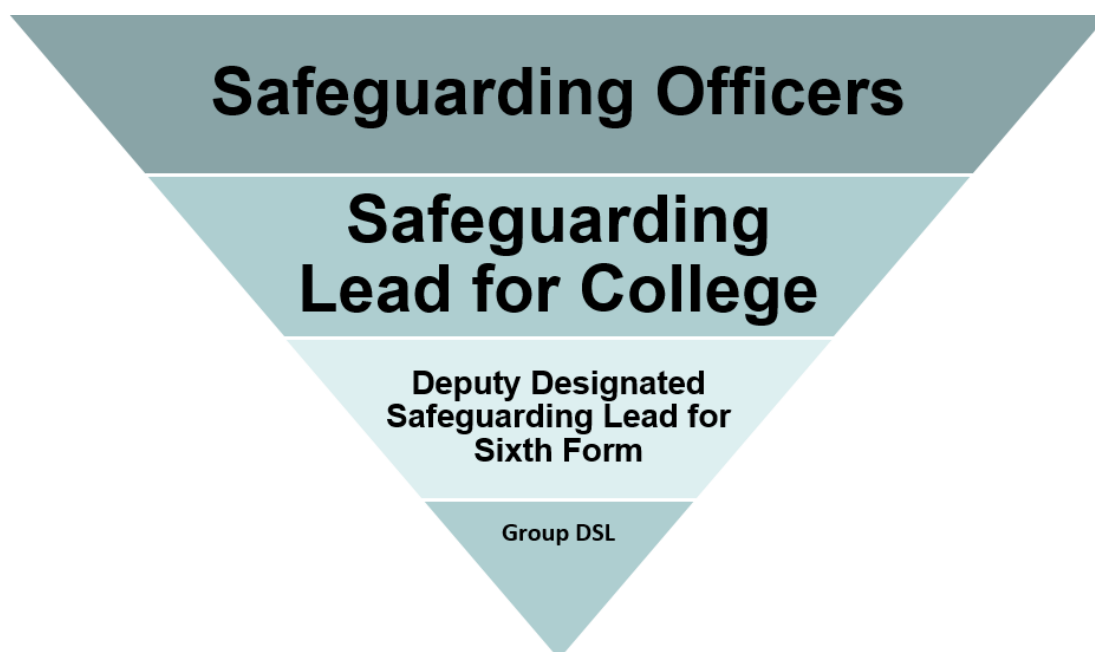
- Special assemblies or workshops to address a specific issue (e.g., youth violence or exploitation)
- Use of drug detection dogs for both educational work and direct screening
- Invitations to visiting speakers to discuss their personal experiences (e.g., honour-based abuse or radicalisation).
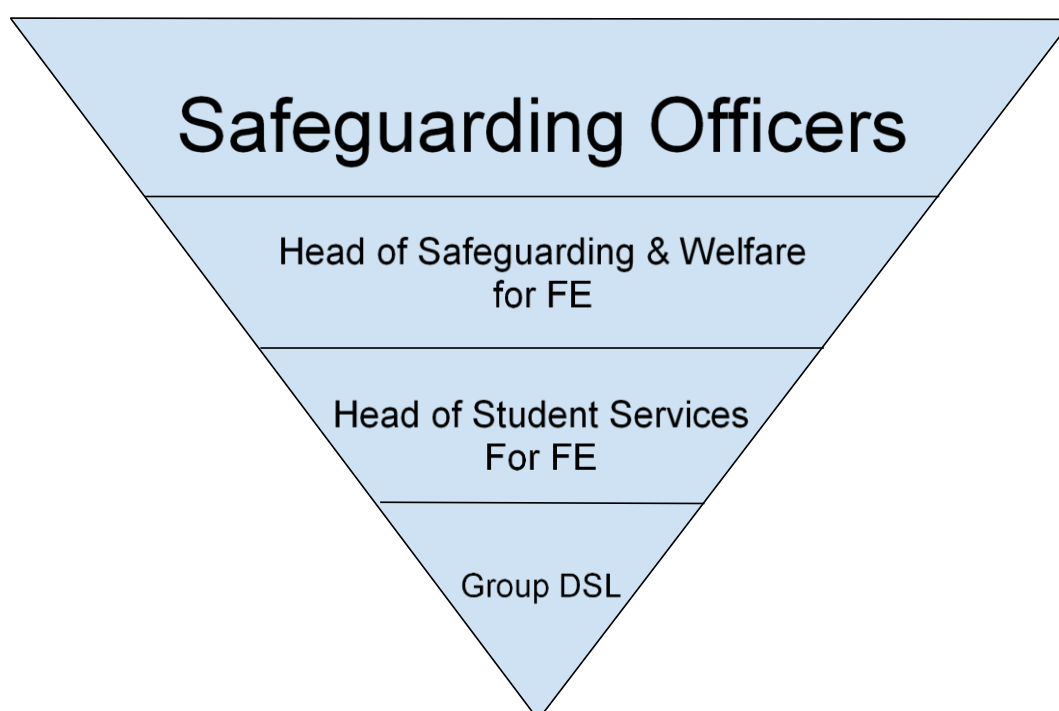
5.   ROLES & RESPONSIBILITIES

5.1   The College has a nominated senior leader with strategic responsibility for safeguarding and who is responsible for fulfilling the role of Designated Safeguarding Lead (DSL). This person is also responsible for supporting and overseeing the operational safeguarding arrangements across the College Group.

5.2   The College Group has in place a number of deputy DSLs, all of whom are trained to DSL standard and receive update training on a two-year cycle. In order to provide clarity for staff using the safeguarding procedures, these are named as follows:

Sixth Form Colleges:

Safeguarding Officers

Safeguarding Lead for College

Deputy Designated Safeguarding Lead for Sixth Form

Group DSL

Langley and BCA College[3]

Safeguarding Officers

Head of Safeguarding & Welfare for FE

Head of Student Services For FE

Group DSL

5.3 The Group Principal, Principals, Corporation and all staff working with or on behalf of the College, whether employed directly or indirectly, and including volunteers and external

contractors who have regular contact with students, receive a level of training appropriate to their role, which will familiarise them with safeguarding issues, and clarify roles and responsibilities in line with the College policies and procedures. All staff undertake training each academic year, with other specific safeguarding training for front line staff available through the training schedule, which is recorded and monitored.

5.4 All staff know their responsibilities for recognising and reporting safeguarding concerns within their day-to-day practice. In addition, an 'open classroom' concept where learning walks are commonplace enables managers to support and monitor safeguarding arrangements.

5.5 All students understand their responsibilities for protecting their own safety and that of others and are actively encouraged to report any concerns.

5.6 All staff are required to complete mandatory safeguarding and Prevent training in order to understand their own roles and responsibilities and to become aware of the policies and procedures as set out in this and related documents. Staff are given information and training about extremism and radicalisation, including how to recognise the behaviours and ideologies considered to be extreme, and the responses required in terms of the usual safeguarding reporting procedures. They are also required to support and promote British Values in all of their work.

5.7 The Designated Safeguarding Lead and members of the safeguarding team are appropriately trained to respond to reported Safeguarding and Child Protection concerns, and have a working knowledge of appropriate referral pathways, for example Local Authority Social Care teams, Prevent teams, and Channel Panels.

5.8 The College Corporation approves the annual Safeguarding and Child Protection Policy and Procedures. The Corporation has nominated a Safeguarding Governor who provides support and challenge to College management.

6.   MONITORING, EVALUATION & REVIEW

6.1 The policy and procedures are monitored on a termly basis by the Designated Safeguarding Lead and reviewed annually by the Senior Leadership Team

6.2 Regular reports and an annual report are provided to the board of governors via the Quality and Curriculum Committee and the Senior Leadership Team (SLT).

6.3 The College audits records related to employment checks annually. This includes regular random sampling of the Colleges Single Central Register held in Human Resources.

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[3] The designated safeguarding lead is based at Langley College, where the majority of safeguarding cases occur and the majority of vulnerable children are enrolled. This negates the need for an additional layer of safeguarding

management at Langley.

7. ASSOCIATED DOCUMENTS

- Safeguarding Procedures 2022-23
- Acceptable Use of IT
- Complaints Policy
- Staff Disciplinary Policy and Procedure
- Staff Capability Policy and Procedure
- Relationships at Work Policy
- Health and Safety Policies and procedures
- Instruments and Articles of Government
- Keeping Children Safe in Education September 2021 (Department for Education)
- Recruitment and Selection Policy and Procedures
- Disclosure and Barring Service (DBS) Checks Policy and Statement on Recruitment of Ex-Offenders
- Student Contract
- Student Management Procedures
- Student Privacy Statement
- Working Together to Safeguard Children 2018 (Department for Education)
- Equality Act 2010
- Serious Violence Documentation when published
- Sexual violence and sexual harassment between children in schools and college

CHILD ON CHILD ABUSE

Aims

This appendix aims to confirm the College Group's position on child on child abuse and provide a clear set of guidelines to staff regarding the actions they must take if they become aware that a learner is being abused, or is at risk of abuse from peers

College Group Position

The College Group recognises that peer-on-peer abuse is likely to be taking place in our colleges, even if it is not immediately visible or evident.

The College Group has a zero-tolerance approach to child on child abuse

Staff must be able to spot the signs of peer-on-peer abuse and may need to reflect on their own biases and experiences to ensure that they are able to be part of the maintenance of a positive and safe culture/environment and identify behaviours might indicate a concern.

Staff must ensure they are fully conversant with their responsibilities in relation to identifying, preventing and referring incidents of peer-on-peer abuse, are not downplaying negative behaviours between young people, and are challenging those behaviours where they arise.

What is child on child abuse?

Child on child abuse is abuse carried out between children (i.e., both perpetrator and victim are under the age of 18). It should be recognised by all staff that children can abuse other children.

It includes, but may not be limited to:

- Bullying (including cyberbullying, prejudice-based and discriminatory bullying);
- Abuse in intimate personal relationships between peers.
- 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).
- Harmful Sexual Behaviours including:
  - Sexual violence, such as rape, assault by penetration and sexual assault; (this may include an online element which facilitates, threatens and/or encourages sexual violence and/or harmful sexual behaviour); Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse.
  - Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.
  - Consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery).
  - Upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual

gratification, or cause the victim humiliation, distress, or alarm.

● 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).

Definitions

The key terms related to child on child abuse are defined as:

Child: Those under the age of eighteen

Vulnerable Adult: For the purpose of safeguarding, and the College duty of care, a vulnerable adult is defined as any adult considered to be at risk

Bullying: Behaviour by an individual or group, repeated over time, that intentionally hurts another individual or group either physically or emotionally. This includes any repeated words or actions, which are aimed at causing someone to feel frightened, miserable, and helpless. Bullying can take many forms, including:

● Verbal: e.g., name calling, sarcasm, threatening & teasing
● Physical: e.g., pushing, hitting, kicking, punching or any use of physical aggressive contact
● Social: e.g., ignoring, spreading rumours, or treating someone like an outsider
● Psychological: e.g., stalking & intimidation

Cyber-bullying: 'Virtual' bullying using technology (e.g., chat rooms, instant messaging, email & mobile phone) which can occur in or outside College. Cyber-bullying can happen at all times of the day, with a potentially bigger audience, as people can forward on content very quickly and easily.

Sexting: Whilst professionals refer to the issue as 'sexting' there is no clear definition. Many professionals consider sexting to be sending or posting sexually suggestive images, including nude or semi-nude photographs, via mobiles or over the Internet but learners may be more likely to interpret sexting as writing and sharing explicit messages with people they know. Creating and sharing sexual photos and videos of under-18s, including selfies, is illegal.

Harassment: Any conduct which is unwanted by a learner, which affects the dignity of the learner or group of learners in the College. Harassment may be repetitive or an isolated occurrence against one or more learners

Upskirting: 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.

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

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.
- displaying pictures, photos, or drawings of a sexual nature.
- Online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence.
- Online sexual harassment may include:

- Non-consensual sharing of sexual images and videos. (UKCCIS sexting advice provides detailed advice for schools and colleges).
- Sexualised online bullying.
- Unwanted sexual comments and messages, including, on social media; and Sexual exploitation; coercion and threats.

Sexual Violence: Under the Sexual Offences Act 2003 sexual violence is described as:

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

Assault by Penetration: A person (A) commits an offence if: s/he intentionally penetrates the vagina or anus of another person (B) with a part of her/his body or anything else, the penetration is sexual, B does not consent to the penetration and A does not reasonably believe that B consents.

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

What is consent?

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

- A child under the age of 13 can never consent to any sexual activity

- The age of consent is 16

- Sexual intercourse without consent is rape.

External guidance and Statutory Responsibilities

Keeping Children Safe in Education; statutory guidance for schools and colleges, makes it clear that abuse is abuse and should never be tolerated or passed off as 'banter' or part of 'growing up.'

The Equality Act 2010 requires the College to:

Eliminate unlawful discrimination, harassment, victimisation, and any other conduct prohibited by the act

Advance equality of opportunity between people who share a protected characteristic (age, disability,

gender reassignment, pregnancy and maternity, race, religion or belief, sex and sexual orientation) and people who do not share it

Foster good relations between people who share a protected characteristic and people who do not share it

Other relevant information for defining, identifying and referring child on child abuse

Child on child abuse often involves an imbalance of power between the perpetrator and the victim. This could involve perpetrators having control over the relationship which makes it difficult for those they abuse to defend themselves. This imbalance of power can manifest itself in several ways. It may be physical, psychological (knowing what upsets someone), or social (e.g., isolating or excluding someone). It could also include issues such as revenge porn or what are often gender issues (e.g., girls being touched, or boys being involved in initiation activities).

Bullying (including cyber-bullying) can be involved in any type of abuse and is often motivated by prejudice or ignorance due to actual or perceived differences between people or groups or people. People who are lesbian, gay, bisexual or transgender (LGBT+), those from minority ethnic groups, or those with disabilities and/or learning difficulties can be more vulnerable to this form of abuse and the College takes it duty to protect more vulnerable learners very seriously.

Child on child abuse should be addressed as a child or vulnerable adult protection concern when there is reasonable cause to suspect that a child or vulnerable adult is suffering, or is likely to suffer, significant harm. Sexting involving those under the age of 18 must always be referred to a Designated Person.

Actions and Expectations

The following actions must be taken by all staff:

All staff and learners have a responsibility to work together to ensure that abuse does not occur, or where it is found, action is taken

Staff must ensure ground rules are set during induction and that learners are made aware of the importance of adhering to fundamental British values, what constitutes abuse (including bullying and cyber-bullying) and how any incidents of abuse will be addressed through Student Management Procedures

Course leaders and pastoral tutors for under 18s, and those under the age of 25 in receipt of an EHCP and/or high needs funding, must ensure learners understand how to stay safe from abuse through Core Studies or equivalent pastoral work.

Staff receiving reports of abuse, including incidents that take place off College premises, must take appropriate action to follow up all allegations/incidents and trigger an investigation which should be managed in line with the Student Management Procedures, but with advice from the duty safeguarding officer or DSL. Sanctions against perpetrators may include suspension whilst an investigation takes place and, in the most severe cases, permanent exclusion may be required.

Staff must ensure appropriate managers are notified. This includes the Additional Learning Support Manager for a learner under the age of 25 who is in receipt of an EHCP and/or high needs funding

All staff involved must carefully consider the potential impact of the abuse on both the perpetrator/s and the victim/s and refer those involved for additional support from Student Services as appropriate. All concerns must be referred to duty safeguarding officer for discussion with the Designated Safeguarding Lead.

Student Services and/or the duty safeguarding officer/Designated Safeguarding Lead will consider referring learners and their parents/carers to other agencies where appropriate. This may include referral for counselling and to the police where a crime may have been committed, e.g., in the case of some types of harassing or threatening behaviour.

All allegations/incidents must be recorded, and learners involved told what is being recorded, in what context, and why.

Any incident of abuse must be discussed with the learners' parents/carers for under 18s and those under the age of 25 in receipt of an EHCP and/or high needs funding (unless this is likely to put the child/vulnerable adult at greater risk of harm). An agreement must be reached as to what action should be taken subject to compliance with the Student Management Procedures

The safeguarding officer, in liaison with the DSL, will make a referral to Children's Services if required.

Specific Actions in relation to Sexual Violence

When disclosing experience of sexual violence, the victim may ask the college not to tell anyone about it. There are no easy or definitive answers when a victim makes this request. If the victim does not give consent to share information, staff may still lawfully share it, if it can be justified to be in the public interest, for example, to protect children from harm and to promote the welfare of children. The designated safeguarding lead (or a deputy) should consider the following:

- Parents or carers should normally be informed (unless this would put the victim at greater risk).
- The basic safeguarding principle is: if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to children's social care.

Rape, assault by penetration and sexual assaults are crimes. Where a report of rape, assault by penetration or sexual assault is made, this should be referred to the police.