

Safeguarding Procedures 2021-22

For the attention of: All Staff
Produced by: Group Director of Safeguarding
Approved by: Board of Governors / SLT
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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 PROCEDURES

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1. Introduction

- 1.1 Safeguarding and promoting the welfare of our students is the responsibility of **all** staff at the Windsor Forest Colleges Group¹. The best interests of the students must be paramount at all times.
- 1.2 This document sets out the detailed procedures that staff should follow in the event of a safeguarding or child protection concern.
- 1.3 It also provides key information, updates and definitions that staff are required to be aware of, and should be read in conjunction with the College's Safeguarding and Child Protection Policy (2021-22).
- 1.4 Our Safeguarding procedures are underpinned by statutory duties placed upon us by the Department for Education, the police and other government agencies. The two most important of these are:

Keeping Children Safe in Education (September 2021) sets out specifically the duties of education providers to keep children safe²

Part 1 of this guidance, 'Safeguarding Information for all staff' is a key summary. At the start of each academic year all staff will update their safeguarding and child protection training by reading this summary and confirming agreement and understanding of its content and the College's safeguarding procedures.

Working Together to Safeguard Children (2018) sets out how organisations and individuals must work together (multi-agency work)- to safeguard and promote the welfare of children³

- 1.5 The College Group and its safeguarding teams also work in line with the procedures produced by the safeguarding partnerships of the local authority areas in which our students live and in which the colleges are based
- 1.6 These procedures will be subject to change in the event that actions and different arrangements for teaching and learning are required because of the Coronavirus pandemic. Appendix III outlines the changes that may be required and how they will be implemented.

2. Your Views Matter

- 2.1 It is recognised that we work in a diverse and changeable environment and we therefore welcome the views, comments and questions of colleagues and other stakeholders in relation to these procedures. If you would like to discuss the safeguarding procedures or policy, or wish to make a contribution to the continuous quality improvement of our safeguarding work, you are invited to contact the Group Director of Safeguarding/Designated Safeguarding Lead at any point during the academic year.

¹ The Windsor Forest Colleges group is Strode's College, Windsor College, Langley College and any associated community locations. These procedures also apply when staff and/or students are at other locations on College business (e.g. on trips and as part of work experience and **industry placements**)

² https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1014057/KCSIE_2021_September.pdf

³ <https://www.gov.uk/government/publications/working-together-to-safeguard-children--2>

3. Defining Safeguarding and Child Protection

3.1 The difference between safeguarding and child protection

Often the terms *safeguarding* and *child protection*⁴ are used interchangeably, but they have different meanings, which all staff must understand.

Safeguarding

Safeguarding is the term used for the many different actions the College takes to ensure that **all** our students, irrespective of their ages or levels of vulnerability, are safe from harm and abuse.

Everyone working at our colleges has a statutory duty to safeguard and promote the welfare of **all** children⁵.

Safeguarding and promoting welfare is defined as:

- Protecting all children from maltreatment
- Preventing impairment of children's health or development
- Ensuring all children are growing up in circumstances consistent with the provision of safe and effective care
- Taking action to enable all children to have the best outcomes

Child Protection

Child protection is a part of our responsibility to safeguard and promote the welfare of children. It refers to the statutory procedures we have a duty to use to protect specific children who are at risk of significant harm or abuse, or who have been harmed or abused.

These specific children may include, but are not limited to, those who disclose they have been affected by, or have experienced (or you have reason to believe have been affected by) of one of the following:

- Physical Abuse
- Sexual Abuse
- Neglect
- Emotional Abuse
- Peer-on-peer Abuse⁶
- Radicalisation or other concerns under the Prevent Duty⁷
- Criminal or Sexual Exploitation (including movement of drugs or county lines)
- Forced Marriage and/or Honour Based Abuse
- Gangs and Weapons Violence or Serious Violence
- Sexting (also known as Youth Produced Sexual Imagery) and digital harms

⁴ All children (under the age of 18) are covered by the Children Acts of 1989 and 2004 and the Education Act of 2002 in relation to child protection.

⁵ Under the age of 18

⁶ See appendix 4

⁷ See appendix 2

3.2 Summary of Expectations and Legal Duties of all Staff

- 3.2.1 All staff (this includes teaching and support staff as well as contractors, volunteers and governors) who work in the college environment have a duty under law to report any concerns they may have about a child or vulnerable adult.
- 3.2.2 It is important that all children are protected from 'significant harm'. All complaints, allegations, disclosures of abuse or suspicions must be taken seriously and acted upon promptly.
- 3.2.3 Where a student under the age of 18, or a vulnerable adult, reports one of the above is happening to them, has happened to them in the past, is likely to happen to them in the future, or you witness something that makes you suspect they are at immediate or significant risk of harm, you must contact the duty safeguarding officer at your college immediately.
- 3.2.4 In most cases we will have legal duty to report this to the appropriate agency (usually Children's Social Care and/or the police), but we may also need to take action to protect the student and keep them safe in the meantime.
- 3.2.5 If a student aged 18 or over, who is not vulnerable, is at risk of immediate or significant harm or makes a disclosure relating to one of the scenarios on the above list, you must still contact the duty safeguarding officer. Our duties are different for those aged 18+, and information sharing must be handled differently, but the safeguarding officer will make a decision about what we need to do.
- 3.2.6 All staff should be working in line with not only the statutory requirements set out in the guidance documents described in 1.4 above, but also with the College Group's stated position on Safeguarding and Child Protection, as set out in the Safeguarding and Child Protection Policy. This is accessible at any time on the College website and the Staff Intranet.

4. Why Safeguarding and Child Protection are Important

- 4.1 It is important for children and vulnerable adults to receive the right help at the right time to address risks and avoid issues escalating. Research and Rapid Reviews have repeatedly shown the dangers of failing to take effective and timely action.
- 4.2 Effective safeguarding practice also significantly improves students' abilities to remain in learning, to maintain the concentration and interest to reach their potential, to achieve qualifications and to progress successfully to employment, training or higher education.
- 4.3 Poor practice includes: 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, sharing information too slowly and a lack of challenge to those who appear not to be taking action.

5. Procedures in Detail

- 5.1 The procedures set out below must be followed whenever an allegation, observation or disclosure is made that a child, or vulnerable adult has been abused or is at significant risk of

harm, or when there is reasonable cause to believe that abuse has taken place or could take place.

5.2 As an exception, any disclosure, allegation or observation you need to refer which includes a **member of staff** as a potential perpetrator or as someone who is experiencing harm or abuse, should **not** be referred through the safeguarding team or the steps below, but be referred directly to one of the following people:

- The Designated Safeguarding Lead/Group Director of Safeguarding
- The Group Director of Human Resources
- The Principal (Sixth Form or FE, as per your College)
- The Group Principal and CEO

5.3 **STEP 1: Recognising Abuse and Significant Harm⁸**

Identification of abuse and 'significant harm' is not always straightforward. All staff should be aware that abuse, neglect and other safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases multiple issues will overlap.

The indicators below are not prescriptive or exhaustive and must be regarded in the context of the individual's usual behaviours and known contextual information about his or her life and habits.

If you are concerned someone might be being abused or at risk of significant harm, consider the following indicators:

- Has the usual/expected behaviour of the person changed, for example have they suddenly become withdrawn or aggressive? Is their behaviour unusual for their age and maturity?
- Have their friends told you they have a problem but they can't tell anyone?
- Do they tell you a story about a 'someone they know' and ask your advice?
- Do they have friends in college? Could they be isolated by peer-on-peer abuse?
- Has behaviour previously been dismissed as 'normal' because they are from a particular culture? Abuse is not acceptable in the UK no matter the background, culture, faith or belief.
- Do you notice any physical signs of abuse such as bruises or other injuries
- Have they become more secretive and distanced themselves from others
- Do they have new friendship groups, or are suddenly in possession of expensive gifts or clothes?
- Has their use of the internet changed – are they spending more time online but it's unclear why? Or have you seen something concerning on their screen?

Remember that most of the indicators listed above could be signs of other concerns or turn out to be of no concern at all, but if you're worried you should always discuss your observations or suspicions with the duty Safeguarding Officer. This conversation is in confidence, but ultimately you may not be able to keep the child or vulnerable adult's confidence if they have disclosed abuse.

⁸ See appendix 2 for definitions of abuse and harm

Abuse or harm is usually described in four main categories⁹:

- Physical abuse
- Sexual abuse
- Emotional abuse
- Neglect

However, there are many other types of specific harm, including self-harm, that can be experienced by a child or vulnerable adult, many of which are described in section 3 above.

Safeguarding procedures should also be followed when concerns are raised in relation to radicalisation and extremism.

Staff should be aware that behaviours linked to drug taking, alcohol abuse, College absence and negative or sexual behaviour online put children in danger.

5.4 STEP 2 - Early Intervention

Sometimes College staff will be generally concerned about a student who may benefit from early intervention before a more serious issue emerges. These students can be referred to a safeguarding officer before the case becomes more serious, or can be referred to wellbeing staff in Student Services or pastoral/tutorial teams for extra support. Students who need early intervention may still be referred to external agencies as appropriate, but team working between support staff and curriculum staff to provide early help to the student is also vital.

Staff should be aware that some students, for example, those with EHCPs or those in care, leaving care, on Child Protection Plans on Child in Need Plans or those with Social Workers for other reasons, can face additional safeguarding challenges and pro-active work should be carried out both in the curriculum area and within the appropriate support/pastoral teams, to ensure the student receives any additional support they may need in light of their personal circumstances.

5.5 STEP 3: Responding to an Allegation or Disclosure

If you have a concern that is beyond early intervention and pastoral solutions, where someone is potentially at risk of harm as described in section 3 above, you should contact the duty safeguarding officer for your college without delay.

Any suspicion, allegation or disclosure of abuse or 'significant harm' must be reported immediately. This is the person indicated on the Safeguarding Rota at each College, published on the staff intranet (the duty Safeguarding Officers are also published weekly in the Windsor Forest Colleges Group Staff Newsletter). A second Safeguarding Officer for each week is also named on the rota. This person can be contacted in the event that the primary contact is already dealing with a case.

Speaking directly to a Safeguarding Officer is essential. Do not use email or voice mail

Promises of confidentiality should not be given to the student, as matters may develop in which that promise cannot be honoured. If the student is a child or vulnerable adult, it is good

⁹ Definitions of these core types of abuse and other types of significant harm can be found in appendix 2

practice to inform him or her as soon as possible that if they tell us/have told us they are at risk of harm, we may need to share that information with other agencies in order to ensure his or her safety.

Take the student seriously and listen without asking leading questions allowing a free recall and impromptu account in a non-judgmental way.

If the complainant is the student him/herself, questions should be kept to the minimum necessary to understand what is being alleged. The use of leading questions can cause problems for the subsequent investigation and any court proceedings.

The safeguarding officer will usually require a written statement/referral from you. This may be requested immediately or subsequently, depending on the case. A Safeguarding Referral Form is available and it is good practice to provide your information on this template. See Appendix 1 or the Staff Intranet.

You must also remain available to assist with the onward management of the case rather than leaving it with the safeguarding team. For instance, your relationship with the student might be more established than that of the safeguarding officer. Therefore you might be asked to find out more, or to help with supporting the student in college subsequently.

A full written record should be made as soon as possible of the nature of the allegation, disclosure or suspicion, and any other relevant information including:

- Date and time
- Place where, and circumstances in which, the allegation or disclosure took place
- Names and ID numbers of all involved, including the complainant/person making the disclosure, the person who is subject to the harm or abuse, and any others who may be witnesses or may have knowledge of the case.
- The nature of the harm or abuse and a description of any injuries observed, and/or any relevant behaviours or impact
- A written account of the allegation or disclosure
- Family/household composition if known
- The local authority area in which the person subject to the harm or abuse resides

Where relevant, the completed Safeguarding Referral Form (on the Staff Intranet and in Appendix 1) or other written statement, should be provided to the Safeguarding Officer or completed shortly after referral and stored in the appropriate restricted folder on the U drive.

5.6 STEP 4: Actions of the Safeguarding Team

Once you have made your referral to the safeguarding team, the Duty Officer will make a decision about the next steps, working always in the best interests of the child or vulnerable adult. Working in consultation with you as the referrer, and where possible with the child or vulnerable adult and his/her parent or carer, the safeguarding officer will usually do one of the following :

- Make a multiagency referral via a MASH¹⁰ at the appropriate local authority
- Make an immediate report to the police, followed up with a MASH referral

¹⁰ Multi Agency Safeguarding Hub

- Make a referral or seek advice from other agencies (e.g. drugs and alcohol support, the FMU¹¹, or Early Help/Family Support Services)
- Advise that the case does not meet safeguarding thresholds and refer you to a pastoral member of staff.
- Advise that we are already aware of the student and the case and provide advice in relation to previous safety work or make a decision to re-refer externally

5.7 STEP 5: Ongoing Support of the Student

It is vital that following any referral, everyone works together to ensure the student remains safe in our care, that any formal safety plans are followed, and that systems are appropriately updated (both in terms of ensuring everyone who needs to know about the case has access to an appropriate level of information about it, and in ensuring that any contact details/emergency contacts are amended – for instance where a parent is potentially a risk to their child and are also the emergency contact we hold).

No one involved should ever assume a safeguarding case ceases to be relevant whilst the student remains enrolled within the College Group.

6. Other Considerations and Specialist Procedures

6.1 Taking Action if there is Immediate Danger

6.1.1 Staff, when deciding what action to take, will normally do this by referring their concern to a Safeguarding Officer as above.

If, however, a member of staff fears that a child is in immediate danger or at risk of serious harm and there is not time to refer to a safeguarding officer, or in the unlikely case that the safeguarding officer and secondary officers are all working on other cases or not available due to it being an out of hours incident, a referral should be made to children's social care (directly to the local authority where the child lives) and/or the police immediately. This should only be done in very rare cases. The number to call can usually be found by carrying out an internet search for "Children's Services" + the name of the local authority.

6.1.2 Guidance makes it clear that anyone can make a referral. Where a referral is made by someone who is not a Safeguarding Officer, the Designated Safeguarding Lead, should be informed as soon as possible that a referral has been made.

6.2 Confidentiality and Responsibility

6.2.1 At all times confidentiality will be paramount when handling cases of child and vulnerable adult protection, with only essential personnel being notified.

6.2.2 Parents/carers may need to be involved but staff must be guided by the Safeguarding Team about who should do this. Consideration will need to be given to whether notifying parents or carers increases the risk of harm or is likely to undermine statutory processes.

6.2.3 The need to work in partnership with other agencies and individuals needs to be offset by the need to maintain the rights of privacy. Information should therefore be sought and shared only on a need to know basis, both within and outside of the College. Any information sharing

¹¹ Forced Marriage Unit (Foreign and Commonwealth Office)

which over-rides the principles of GDPR must be backed up by clear evidence that it safeguards and individual and is necessary in order to prevent harm or further harm.

6.3 Disclosures Made Outside College Hours

6.3.1 It is unlikely that staff will receive a disclosure outside College hours¹², but if this does happen, and there is no safeguarding officer available the College Emergency Safeguarding Procedures should be followed. These can be found on the Staff Intranet.

6.3.2 In summary, emergency procedures involve working directly with the appropriate emergency services and depending on the situation, might include:

- Calling the police or an ambulance via 999
- Seeking police advice on 101
- Contacting the duty social worker via the website of the relevant local authority

6.4 Peer-on-Peer Abuse

6.4.1 The College Group has a zero tolerance approach to peer-on-peer abuse¹³. It can take a number of forms, including gender based bullying, sexual abuse or harassment and bullying, including online.

6.4.2 Most incidents of peer-on-peer abuse will also need to involve the Student Management Procedures, which are available on the Staff Intranet. If you witness peer-on-peer abuse you must address it in the same way and using the same procedures as if you become aware of an adult abusing a child.

6.4.3 The College must record all cases of peer-on-peer abuse.

6.4.4 The full details, including the college position on peer-on-peer abuse and the expectations of all staff can be found in appendix IV

6.5 Vulnerable Students Including Those with SEND

6.5.1 As stated above, some individuals may be more vulnerable than others and may have additional safeguarding concerns. These include students with disabilities where there may be additional barriers recognising abuse and neglect.

This can include:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration;
- Children with SEND can be disproportionately impacted by things like peer-on-peer abuse without outwardly showing any signs; and
- Communication barriers and difficulties in overcoming these barriers.

6.5.2 Staff should be aware of students in this category and discuss any concerns with the Learning Support team in conjunction with the duty Safeguarding Officer.

6.5.3 Staff should also be aware of communication and disclosure barriers in relation to students learning English for speakers of other languages.

¹² After 5pm in term-time, weekends, and non-term-time

¹³ Abuse carried out on a child (under 18) by another child

6.6 Children in Care (CiC), Care Leavers and Students with Social Workers

- 6.6.1 Staff should be aware of the safeguarding issues around Children in Care since the most common reason for children entering care is as a result of abuse or neglect. Care Leavers are those who entered care as children but are now over 18.
- 6.6.2 Similarly staff should be extra vigilant around students with social workers. Like Children in or Leaving Care, these students are likely to be at high risk of abuse and harm. They might be on Child Protection Plans and/or particularly susceptible to exploitation.
- 6.6.3 Any concerns about CiC, care leavers or other students with social workers can be raised with the Inclusion Coordinator or a Safeguarding Officer in the first instance.

6.7 Illegal Drugs and Use of Drug Detection Dogs

- 6.7.1 As part of our objective to keep safe our students and the college community, we will undertake drugs education with our students on programmes of study. This will usually be carried out through Core Studies or pastoral teams in conjunction with Student Services and will give students the opportunity to discuss and assess the impact of drug use on their communities and to consider the dangers and risks related to drug taking and associated issues such as county lines and child exploitation.
- 6.7.2 The college has clear expectations and procedures relating to the use or selling/buying/possession of illegal drugs on our premises. We do not expect students to be carrying or under the influence of drugs in college time or on college property. Should it be suspected or proven that a student has taken, or is in possession of drugs, misconduct procedures will apply and could result in exclusion. However, we equally understand the need to keep safe children who are being exploited to use, carry, sell and conceal drugs.
- 6.7.3 Where appropriate, and in particular where we suspect a child is being exploited, we will make referrals to Children's Services and/or Substance Abuse teams to access any available support for students who need it.
- 6.7.4 We will report any suspicion or evidence of use or possession of illegal drugs to the police. We work closely with the police and share intelligence wherever possible.
- 6.7.5 All our students are made aware of our expectations and rules about illegal drugs via our student contract and induction arrangements.
- 6.7.6 Our drugs education delivery may include the use of visiting speakers, and of detection dogs. When we invite dog teams into our college, they and their handlers may undertake a range of activities, including delivering educational presentations and general screening. Our aim in using dogs for screening is to ensure our colleges are a drug-free, safe and pleasant environment for everyone. The dogs are safe, highly trained and managed by professional dog handlers.
- 6.7.7 Dog teams will be used for proactive (buildings and areas) and passive (people) screening.
- 6.7.8 Usually students will be made aware in advance if a dog team is attending the college. However, some screening visits will not be announced.

6.7.9 Should a detection dog indicate the presence of drugs on a student (this is achieved without the dog coming into contact with the student):

- The student will be subject to the College Group's Search Procedures, which are based on DfE guidance on search
- Should illegal drugs be discovered, the student will be suspended pending an investigation and disciplinary action
- The college will inform the student's parent/carer (if under 18) and the police (irrespective of age)
- The police may conduct the search, and carry out any of their own relevant procedures (including arrest in the most serious cases) if they are in attendance when a student is found to be in possession or under the influence of illegal drugs
- The student will be subject to suspension and college disciplinary procedures, irrespective of any actions the police choose to take
- The police will be asked to remove/collect and destroy any drugs found
- Children's Services will be informed if the student is known to be supported by a Social Worker or other professional
- Where there is significant concern for the student's wellbeing, the College may also refer the student to other external services such as substance abuse services or counselling, as appropriate

6.7.10 Should a detection dog indicate the presence of drugs in the building/car park/on the premises, which is not linked to an individual:

- An internal investigation will take place, and disciplinary action taken against any student found to be involved or linked to any illegal drugs found
- The police will be asked to remove/collect and destroy the drugs

6.7.11 Wherever possible, the college will aim to increase its drugs education provision to students in any particular groups or curriculum areas on the rare occasion that a significant problem is identified

6.8. Preventing Radicalisation – The Prevent Duty (updated April 2021)¹⁴

6.8.1 Section 26 of the Counter-Terrorism and Security Act 2015 (the Act) places a duty on certain bodies, to have "*due regard to the need to prevent people from being drawn into terrorism*". The Act states that the authorities (including Further Education institutions, including sixth form colleges) subject to the provisions, must have regard to this guidance when carrying out the duty.

6.8.2 The legislation aims to reduce the risk of radicalisation of vulnerable people by extremist groups, including some religious groups, animal rights groups and extreme right wing groups who may promote terrorism and violent extremist activity.

6.8.3 Extremism is defined as vocal or active opposition to Fundamental British Values: democracy, the rule of law, individual liberty, mutual respect, and tolerance. Also included in the definition of extremism are calls for the death of members of the British armed forces, whether in this country or overseas.

6.8.4 College staff should be aware of signs of radicalisation and have the confidence to report their concerns to the Duty Safeguarding Officer or in severe or urgent cases, directly to the DSL.

¹⁴ <https://www.gov.uk/government/publications/prevent-duty-guidance/prevent-duty-guidance-for-further-education-institutions-in-england-and-wales>

- 6.8.5 If a member of staff has a concern about a person whom they believe has been radicalised, it should be treated with the same seriousness as any other safeguarding issue and the same procedures should be followed.
- 6.8.6 The College Group also promotes the ethos of the Prevent agenda by encouraging free and open debate but challenging extreme views. It will encourage through its classroom practice and its enrichment and induction activities, a belief in equality of opportunity and the celebration of diversity.
- 6.8.7 The College will not host, or allow its premises to be used, by extreme groups and will seek to prevent the distribution of extreme literature.
- 6.8.8 The College Group has a legal responsibility to forbid the promotion of partisan political views in the teaching of any subject and takes such steps as are reasonably practicable to ensure, that where political issues are brought to the attention of students, they are offered a balanced presentation of opposing views. Promotion of any organisations linked to violent extremism is contrary to the values of the College and could constitute misconduct.
- 6.8.9 Requests for external speakers are dealt with under the External Speakers & Events Policy in line with the Prevent Duty and College values.
- 6.8.10 The College Group will provide appropriate support, through its own staff or by referral to external agencies, for any student at risk of radicalisation.

6.9 Filtering and monitoring

- 6.9.1 The College Group uses a web filtering system as a means of restricting access to harmful internet content. This prevents access to websites promoting extremist views and encouraging the radicalisation of children and vulnerable people. In addition to this, the College Group monitors staff and student activity on the network utilising keyword-based content filtering software.

6.10. Fundamental British Values (FBV)

- 6.10.1 The promotion of FBV is part of the Prevent Duty, which Colleges have a legal duty to promote.
- 6.10.2 British Values as defined by the Prevent Duty are:
- Democracy
 - The rule of law
 - Individual liberty
 - Mutual respect
 - Tolerance
- 6.10.3 These values are congruent with the College's Mission and Values, which all staff must know and follow.

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

College Values

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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

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Respect - showing fairness, courtesy and mutual respect

6.11 Digital safety

6.11.1 The use of technology has become a significant component of many safeguarding cases, including those related to child sexual exploitation (CSE); radicalisation; sexual predation, and peer-on-peer abuse. Technology often provides the platform that facilitates harm.

6.11.2 The breadth of issues classified within online safety is considerable, but can be categorised into three areas of risk:

- Content: being exposed to illegal, inappropriate or harmful material
- Contact: being subjected to harmful online interaction with other users (including with those who wish to groom or abuse others)
- Conduct: personal online behaviour that increases the likelihood of, or causes, harm

6.11.3 The College has a whole organisation approach to digital safety.

6.11.4 The College's approach to filtering and monitoring of internet use is set out above

6.11.5 During a time when more teaching and learning has recently taken place online due to the Coronavirus pandemic, and may need to in the future for the same reason, additional information has been made available to staff to remind and advise about safe online practice and identification of potential safeguarding risks and indicators

6.11.6 Work with students on digital safety is carried out within Core Studies/Pastoral teams, and can also be carried out at individual level where there is an identified risk

7. The Safeguarding Team

7.1 TWFCG is a large, multi-site organisation, and as such the structure of the safeguarding team is as per the diagrams in 7.1.3 below.

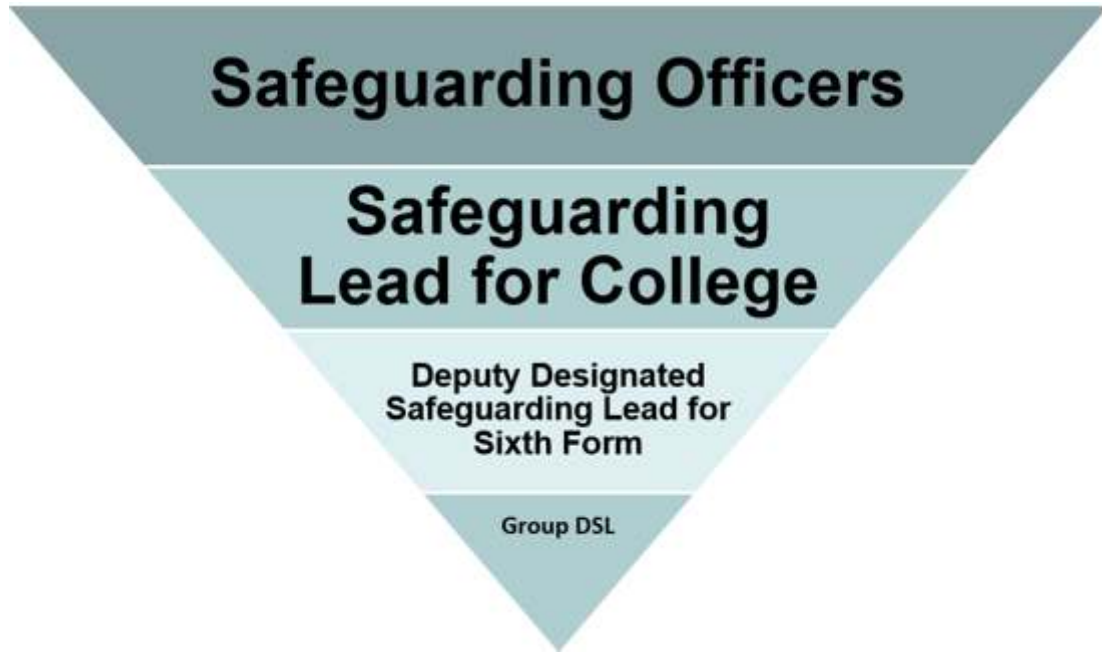
7.1.1 The College Group has a single DSL (Designated Safeguarding Lead) responsible for safeguarding practice across the group, but there are a number of Deputy Designated Safeguarding Leads (DDSLs).

7.1.2 The Vice Principal Curriculum and Quality at the Sixth Form Colleges takes a safeguarding leadership role at Windsor and Strode's Colleges, working closely with the DSL. The DSL is

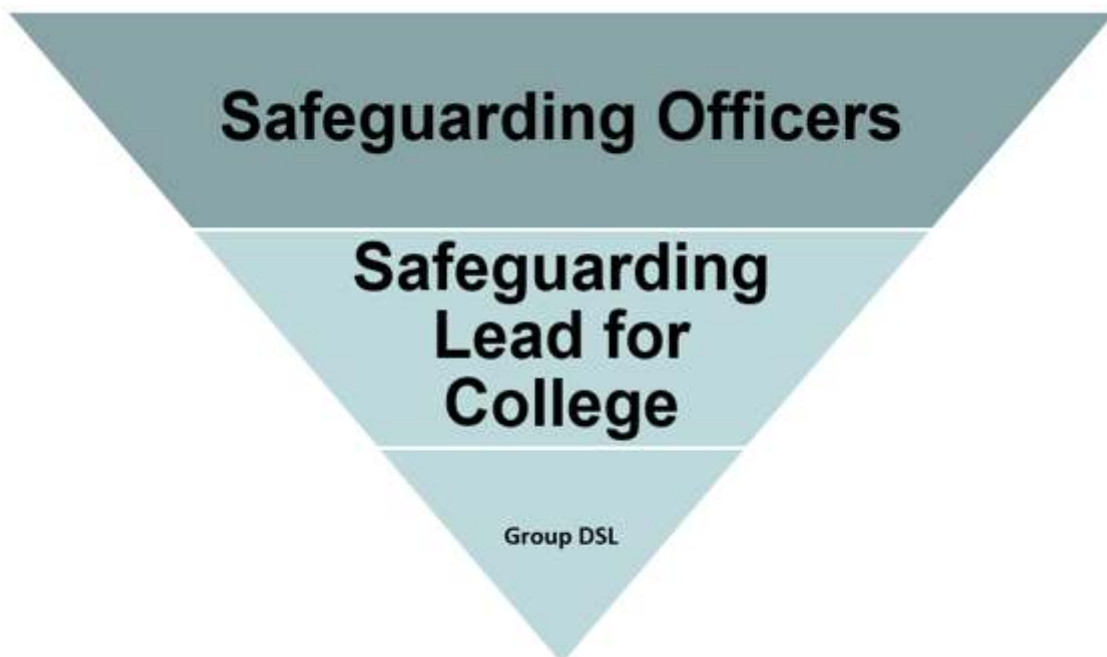
based at Langley where the majority of vulnerable students study and the majority of safeguarding cases occur.

7.1.3 Different roles within the safeguarding teams are given different names for clarity within the organisation, but all are DDSLs and all are trained to DSL standard.

Sixth Form



Further Education



7.1.4 The Group Director of Safeguarding is the Designated Safeguarding Lead (DSL) for the College Group.

The Group Director of Safeguarding is also the Child in Care (CiC) and Care Leaver (CL) nominated person (sometimes know as the DT – Designated Teacher).

Day-to-day work related to these roles is delegated to a number of deputy designated safeguarding leads (DDSLs) but responsibility always remains with the DSL.

7.1.4 The safeguarding teams at each College comprise DDSLs known as safeguarding officers. These colleagues do the daily safeguarding work on a rota basis. One safeguarding officer in each team is the safeguarding lead for the college, acting a source of initial advice for the others and a point of contact for external agencies.

Strode's College

- Associate Director of Tutoring (Safeguarding Lead)
- Director of Student Services
- Teacher of Dance
- Tutor Team Leader

Windsor College

- Student Experience and Wellbeing Coordinator (Safeguarding Lead)
- Head of Tutoring
- Tutor Team Leader
- Head of Humanities

Langley College

- Student Experience and Wellbeing Coordinator (Safeguarding Lead)
- Group Director of Safeguarding
- Inclusion Coordinator

Additional Team Members

The following staff can support the safeguarding officers as required:

- Group Director of Safeguarding (all sites)
- Inclusion Coordinator (all sites)
- Director of Windsor College (Windsor College)
- Vice Principal of Strode's College (Strode's College)
- Vice Principal Curriculum and Quality (Sixth Form)

8. Allegations Concerning Members of Staff

8.1 Any suspicion, allegation or actual abuse of a student by a member of staff must be reported to the Designated Safeguarding Lead (DSL) as soon as possible. If it isn't possible to contact the DSL, the matter must be reported to the Group Principal and CEO, the Group Director of Human Resources or one of the College Principals immediately. Any observation of any

inappropriate conduct that may indicate an individual is not suitable to work with children, or is causing harm to students, should be reported in this way.

- 8.1.2 Staff are required to report all cases of suspected violation of the Sexual Offences (Amendment) Act 2000. Any sexual activity between a member of staff in a position of trust as defined in the Act and a pupil under 18 years of age constitutes an offence.
- 8.1.3 In matters of allegations against staff, the College Group works entirely in accordance with Part 3 of Keeping Children Safe in Education, including in relation to preventative measures related to the safer recruitment of staff.
- 8.1.4 If the DSL is the subject of the allegation or complaint, the matter must be reported to the Group Principal and CEO, the Group Director of Human Resources, or one of the College Principals. In the event of a complaint being made against the Group Principal and CEO, a Principal, or other Senior Post Holder, the DSL would notify the Chair of the Board of Governors.

8.2 Unsafe Practice

- 8.2.1 All staff and stakeholders should feel able to raise concerns about poor or unsafe practice and potential failures in the College's safeguarding system and confident that such concerns will be taken seriously by the Senior Leadership Team.
- 8.2.2 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 can be found at <https://www.gov.uk/whistleblowing>
- 8.2.3 The NSPCC whistleblowing helpline is available for staff who do not feel able to raise concerns regarding child protection failures internally. Staff can call: 0800 028 0285 –The line is available from 8:00 AM to 8:00 PM, Monday to Friday and Email: help@nspcc.org.uk

8.3 Taking Action to Protect Yourself

- 8.3.1 It is important that staff understand the need to safeguard and protect themselves (for instance from misunderstandings or false allegations)
- 8.3.2 All communication and relationships between staff and students, including interactions online, should take place within clear and explicit professional boundaries and be transparent and open to scrutiny. To avoid any ambiguity of intention, staff must not, for example, give personal telephone numbers or personal email addresses to students.
- 8.3.3 Likewise staff have a responsibility to ensure that their curriculum and related materials are suitable for a College setting and appropriate to the age group of students involved. For instance, ensuring that resources, texts, scripts etc are not going to cause trauma to those who may have been abused, and that appropriate support is in place and advice sought if class discussions or activities might be difficult for some students to manage.
- 8.3.4 Staff should always keep their line manager informed if conversations (in person or online) are starting to cause concern. For instance, students disclosing their personal problems to a member of staff can quickly turn into an attachment on the part of the student if not managed transparently or honestly. Tell your line manager and the safeguarding officer if you think a conversation is getting out of hand or the student is forming an inappropriate attachment.

8.3.5 Good Practice for staff:

DO...

- Read and understand the College's safeguarding policy and procedures
- Know your responsibilities and duty of care
- Be alert to any concerns that relate to extremism and radicalisation or to peer-on-peer abuse, which must be reported to the safeguarding team.
- Refer on any concerns you have in person or by telephone to the duty Safeguarding Officer immediately
- Be cautious of inappropriate conversations and relationships with students
- Use appropriate means of communication with students
- Set rules and expectations (including where and when you are available to students, and where and when you are not)
- Be consistent in how you build relationships with students, Differentiate the support you give them, but avoid closer relationships with some, or special arrangements that could be interpreted as friendship or another type of relationship
- Always meet students individually in open areas or places where you can be seen by colleagues
- Be a role model and quash any inappropriate behaviours straightaway
- Know and understand the professional standards expected of you as a member of staff
- Think about how safeguarding can be built into your work wherever you are placed in the College

DON'T...

- Delay following safeguarding procedures if you have a concern or receive a disclosure.
- Give your personal mobile or email to students, or interact with them on Social Media or any encrypted or unregulated platform
- Assume someone else is picking up the problem
- Promise not to tell someone else when someone makes a disclosure
- Change the way you communicate/interact with students if you have work online. Students should not be able to see into your personal life, dress inappropriately, or converse with you in the middle of the night, for instance, just because ways of working are remote
- Get involved in students' personal lives, or meet with them in social settings
- Investigate concerns or disclosures without the support and direction of a safeguarding office

9. Key Documents & Useful Resources

9.1 College documents (Found on the Staff Intranet)

- External Speakers & Events Policy
- Acceptable Use of ICT
- Complaints and Compliments Policy
- Disciplinary Policy and Procedure
- Capability Policy and Procedure

- Disclosure and Barring Service (DBS) Checks Policy and Statement on Recruitment of Ex-Offenders
- Relationships at Work Policy
- Health and Safety Policy and associated procedures
- Recruitment and Selection Policy and Procedure
- Student Contract 2021-22
- Student Management Procedures 2021-22
- Student Privacy Statement 2021-22
- Diversity and Equality Policy 2021-22

9.2 Additional External Resources

9.2.1 NSPCC Website <https://www.nspcc.org.uk/>

9.2.2 The Education and Training Foundation has lots of useful curriculum materials and resources, including video and online courses for students and staff on the Prevent Duty. See <http://www.preventforfeandtraining.org.uk/>

9.2.3 Information and support on digital safety

www.thinkuknow.co.uk

<https://www.ceop.police.uk/Safety-Centre/>

www.disrespectnobody.co.uk

www.internetmatters.org

www.pshe-association.org.uk

educateagainsthate.com

www.gov.uk/government/publications/the-use-of-social-media-for-online-radicalisation

<https://swgfl.org.uk/>



Safeguarding Referral Form

Student Name			
ID Number		ALS?	
DOB		Age at Referral	
Date of Referral		Gender	
Lead Staff Member			

Key External Contacts		
Agency	Name	Tel / Email
Social Services		
Police		
Parent / Carer		

Summary of Reasons for Referral			
INITIAL ACTION			
Date		Update By	

UPDATE 1			
Date		Update By	

UPDATE 2			
Date		Update By	

UPDATE 3			
Date		Update By	

DEFINITIONS OF ABUSE AND HARM

Abuse is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely by others (e.g. via the internet). They may be abused by an adult or adults or another child or children (peer-on-peer abuse – see Appendix 3)

The Children's Act 1989 and Keeping Children Safe in Education (2021) identifies four main categories of abuse, which are described below.

Physical abuse: a form of abuse that may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child.

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. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

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. Females can also be abusers as can other children. The sexual abuse of children by other children is a specific safeguarding issue (also known as peer on peer abuse) in education and all staff should be aware of it and their school or colleges policy and procedures for dealing with it (see appendix III).

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 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.

All staff should be aware that child sexual and child criminal exploitation are forms of child abuse.

In addition to the above, staff should be aware of:

Discriminatory Harm

Guidelines under the Youth, Justice and Criminal Evidence Act 1999, indicate that Colleges need to be aware of discrimination towards people, especially vulnerable or intimidated persons, and its implications. Examples include:

- Racist remarks or racist attack on the person

- Sexist remarks or offensive behaviour
- Offensive remarks related to a person's disability
- Harassment of any kind, including slurs or similar treatment.

Female Genital Mutilation (FGM). Duty to report to the police

Female Genital Mutilation (FGM) is an unacceptable form of abuse and violence against girls and women; it is known as female circumcision and is illegal in the UK. FGM is practised in at least 28 African countries, as well as countries in the Middle East and Asia. Research in the UK has identified three key communities -Somali, Kenyan and Nigerian- where women and girls are particularly vulnerable.

The practice tends to occur in areas of high populations of FGM practising communities. Professionals need to be alert to the possibility of a girl being at risk of FGM or already suffering from the effects of the procedure.

The practice is usually carried out on girls between infancy and 15 years. Guidance states that a member of staff '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 person must report this to the police'. Any member of staff who has concerns or information around a student who may be the victim of FGM, should contact a duty Safeguarding Officer promptly.

Any information around someone suspected of carrying out this practice on others, or failing to protect a child from this procedure, should also be passed to the duty Safeguarding Officer

Forced marriage

The difference between arranged and forced marriage

The tradition of arranged marriages has operated successfully within many communities and many countries for a very long time. A clear distinction must be made between a forced and an arranged marriage. In arranged marriages, the families of both spouses take a leading role in choosing the marriage partner but the choice about whether or not to accept the arrangement remains with the potential spouses. In forced marriage, one or both spouses do not consent to the marriage or consent is extracted under duress. Duress can include both physical and emotional pressure.

Possible indicators of forced marriage:

- Absence (especially unusual patterns of this)
- Decline in performance or punctuality
- Low motivation at College
- Poor exam results
- Being withdrawn from College by those with parental responsibility
- Not allowed to attend extracurricular activities.
- Unexpected/sudden departure for lengthy family holiday (student may show reticence to go or be concerned about family members controlling passports and travel documents)

What to do if you are concerned

- Immediately contact the duty safeguarding officer
- If you suspect risk of forced marriage and the student wants to talk to you but has not yet disclosed:
 - Make sure you can meet them in a private place where there is a phone.

- Have a 'story' ready about how you are providing support with learning in case you are challenged by the family.
- Listen to what the student has to say and write it down.
- Do not question, apart from to clarify.
- Inform the student you have to talk to a safeguarding officer and/or senior member of staff but that it will remain confidential.
- Do NOT raise concerns with the student's parents, family or community leaders.
- Provide the opportunity for them to talk to the Forced Marriage Unit on:

020 7008 0151

Child criminal exploitation (Including County Lines)

Criminal exploitation of children is a geographically widespread form of harm that is a typical feature of county lines criminal activity: drug networks or gangs grooming and exploiting children and vulnerable people to carry drugs and money from urban areas to suburban and rural areas, market and seaside towns. Key to identifying potential involvement in criminal exploitation are missing episodes, when the victim may have been trafficked for the purpose of transporting drugs. Different cases may require multi-agency working with different organisations, which the safeguarding team will manage. They may also consider a referral to the National Referral Mechanism. Like other forms of abuse and exploitation, criminal exploitation:

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

COVID 19

This appendix is designed to complement but not supersede, the College Group's existing Safeguarding and Child Protection Policy and Procedures 2020-21 in the event that the continuation of the Coronavirus pandemic disrupts learning at an organizational, local or national level during the academic year.

The College Group recognises that there are specific safeguarding challenges related to the pandemic and that the policy and procedures below may need to be applied partially or in full should infections rise or remote working be required.

Policy Statement

The College Group is committed to providing a learning environment, including online environments, where all users, 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).

Safeguarding is recognised as everyone's responsibility, including when we are operating remotely and where we are working in more restrictive and challenging circumstances and environments. 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, and give due consideration to how they discharge their safeguarding responsibilities during any period of lockdown or of remote and different working practices.

Staff must also be mindful of the general effects of the on-going pandemic outside of any lockdown arrangements or remote working practice. This might include increased anxiety and mental health concerns, more online risks, or risks around actions and decisions based on misinformation,

Students, staff, governors and volunteers must be confident that they can report all matters of a safeguarding nature to a safeguarding officer, where the information will be acted upon swiftly and securely, following the correct procedures, irrespective of any changes to learning environments and location of the person at risk of harm.

Purpose

This appendix aims to inform and guide staff and all other stakeholders around the additional, different and developing safeguarding arrangements required should a further lockdown or other mitigating actions be required

It also confirms that the underpinning principles of safeguarding and child protection required by Keeping Children Safe in Education (September 2021) and the individual policies and procedures of local safeguarding partners, continue to be the basis of our safeguarding and child protection practice, irrespective of how we are delivering teaching, learning and college services.

Scope

This appendix applies to all staff and stakeholders, and all activity they undertake, irrespective of the location from which they are working in the case that we need to work differently because of the spread of COVID 19.

It assumes that the three colleges and their out-centres are open to students and that learning is taking place through a range of mechanisms, including face-to-face and online.

The College Group's existing Safeguarding and Child Protection Policy and Procedures will remain unchanged and in place. However, this appendix will continue to be updated and promoted, as regularly as required, should we need to deliver our services differently.

Fundamental Principles

It is recognised that College business during the COVID-19 pandemic can be different to our usual way of operating, but should we need to operate differently during the academic year, a number of fundamental principles of safeguarding remain unchanged:

- With regard to safeguarding, the best interests of students must always continue to come first
- If anyone engaged in any college activity, irrespective of their location and mode of working, has a safeguarding concern about any student they should continue to act and act immediately
- A DSL¹⁵ or deputy will be available during working hours, as per the usual arrangements
- It is essential that unsuitable people are not allowed to enter the children's workforce and/or gain access to children
- Children should continue to be protected when they are online.

Mechanisms for Reporting and Acting Upon Safeguarding Concerns

It is vital that all staff and stakeholders recognise the continued importance of acting immediately on any safeguarding concerns during any required changes to usual, face-to-face teaching, learning and service provision.

Should we need to deliver teaching, learning and services in ways that are different to usual, arrangements remain in place and will be re-promoted to all staff, for the referral of safeguarding concerns.

The above arrangements and the College Group's safeguarding email address will be confirmed with Local Authorities where required. Welfare checks, Section 17 and Section 47 requests will continue to be dealt with through the usual channels.

If learning needs to take place offsite, staff making safeguarding referrals should give careful consideration to the increased difficulties the safeguarding team will have in meeting with students, gaining additional information quickly, and retaining a student in a place of safety. Before making a referral, staff should:

- Double check they have as much information as possible about the concern to prevent any missed opportunities to clarify, if the student is in a different location to the staff member
- Know, where possible, the current location of the student if they are not on site
- Make an informal assessment based on interaction with the student, as to whether the student is in danger and how imminent that danger is
- Provide, where possible, any contextual information about the student (such as any knowledge about the family, any information about social connections and any suspicions about behaviour and activities outside college that may be relevant)
- Be aware that we would expect a significant increase in referrals if we need to revert to remote learning and be willing to contact other Safeguarding Officers if the Duty Officer is not immediately available
- Provide information when requested and in a timely fashion, about attendance, absence and progress to inform local authority returns and ensure any missing episodes are identified and reported

Reporting Mechanisms, Thresholds and Changing Requirements of the Local Three Safeguarding Partners

The College enrolls students from numerous local authority areas, sits itself in more than one authority area and policing region, and works with a significant number of virtual schools, CCGs¹⁶ and local authority contractors.

¹⁵ Designated Safeguarding Lead

¹⁶ Clinical Commissioning Group

Information about changes to reporting mechanisms, requirements and thresholds during any regional or national lockdown situations, from the local three partners in each of these areas, are communicated by email, usually via the DSL or Senior DSL, but on occasion through the College Group's generic enquiries email address. This information will be reviewed by the Group Director of Safeguarding/DSL, and disseminated and stored as appropriate.

Updated advice from the three partners in these circumstances specifically in relation to children with EHCPs¹⁷ is managed and responded to by the Learning Support team.

Contact with Vulnerable Students

The College Group recognises the importance of continued and consistent work with key workers, social workers and virtual schools in relation to vulnerable students in the event of a lockdown or other situations caused by the pandemic. This work will continue in a way as closely aligned as possible to usual practice.

The Inclusion Coordinator and the Student Wellbeing Officers would continue to liaise regularly with all relevant multiagency professionals and continue to take part in ICPCs¹⁸, CGMs¹⁹, Strategy Meetings, TAFs²⁰ and any other multiagency meetings as requested but online/by conference call. Should any Local Authorities return to in-person meetings, attendance will be risk assessed to protect those members of staff requested to attend.

PEP²¹ meetings would be held to schedule for Children in Care, but would be conducted online/by conference call

Additionally, vulnerable students²² would be tracked and monitored as closely as is feasible by members of the core safeguarding team, to encourage engagement with different ways of working and to ensure any missing episodes are addressed.

This tracking is would be in addition to contact made by subject teachers, personal tutors and pastoral teams, and would to ensure the wellbeing of each individual, identify any further issues that need to be raised with Social Care, and encourage ongoing engagement with the college and programme of study.

Online/Remote Learning

National changes to guidance on social distancing and other safety measures may mean that some students will undertake part of their learning online (this might be for a defined time or on a week by week alternating pattern, depending on the college). Staff will all received advice and guidance in these circumstances about how to work safely online with students. This will be disseminated via the College Group's staff communication emails and other communications from the Group Director of Safeguarding.

Staff would be expected as part of their safeguarding responsibility to report anything of concern in relation to online activity, including peer-on-peer abuse, to the duty Safeguarding Officer

Pastoral Support and External Support Services

In the event of changes to operational arrangements because of COVID-19, every effort will be made to ensure pastoral and wellbeing support continues to be made available on the phone and online for all students who need it but who may be learning at home.

¹⁷ Education, Health and Care Plan

¹⁸ Initial Child Protection Conference

¹⁹ Core Group Meeting

²⁰ Team Around the Family

²¹ Personal Education Planning

²² Vulnerable students are defined as those who are in care, leaving care, are on a Child Protection Plan, are a Child in Need, have an EHCP and all others who have a social Worker.

In addition to this, lists of the contact details of external bodies who can help individuals and families will be distributed to all students by email and to parent/carer contacts where available. This will aim to ensure that if a student or parent/carer feels uncomfortable trying to seek help remotely from the college, or enters crisis outside college working hours, they have a range of contactable sources of potential support.

Risk Assessments

Where requested by Social Care or the Police, risk assessments will be completed for vulnerable students.

This is especially important for students with EHCPs, where there may be a heightened risk to them being at home for a long period. The safeguarding team will feed into these processes as required and on the request of Assistant Principal Student Services (Langley) or the Vice Principal Curriculum and Quality (Sixth Form).

Attendance and Engagement

Teachers, Personal Tutors, Pastoral teams and support staff will work together to try to reach and engage all students in remote teaching and learning where appropriate. Services will also remain in place for those students fully attending college

Safer Recruitment and New Staff

New staff starters will still be subject to the usual safer recruitment procedures such as DBS checks and references. They will also be required to complete the online safeguarding course for staff on arrival or soon after, and to read and confirm they have read Part 1 of Keeping Children Safe in Education (September 2021).

New Policies and Procedures

The College Group takes a whole institution approach to safeguarding and as such, the impact on the safeguarding arrangements laid out in this appendix and in the Safeguarding and Child Protection Policy and Procedures 2021/22 of any new policies implemented by the colleges in response to the COVID-19 pandemic will not weaken or undermine the organisation's approach to safeguarding.

Ongoing Changes to Delivery of Teaching, Learning and Support

It is recognised that teaching and learning is changing and evolving in response to the pandemic.

The safeguarding, and the health and safety, of our students will remain paramount irrespective of any new arrangements, changes or developments in the current academic year. Teams, services, policies and relationships between organisations will need to flex to safeguard our learners through this potential change.

All staff will continue to be reminded of their safeguarding responsibilities, and notified of any required actions in relation to the pandemic, through the usual communication channels

Roles & Responsibilities

All staff: Responsibility for safeguarding our students (including the identification, referral and recording of concerns)

Group Director of Safeguarding /Senior Designated Safeguarding Lead: Responsibility for the review, updating and communication of this appendix to the Safeguarding and Child Protection Policy and Procedures, and the communication of the need to employ its principles and procedures. Responsibility for the day-to-day operational safeguarding arrangements relating to new referrals, the work of the safeguarding team and the monitoring of students with Social Workers and those in care.

Group Director of Human Resources: Responsibility for Safer Recruitment and coordinating and required work on any allegation made against a member of staff

Senior Leadership Team: Responsibility for the approval of any required changes to safeguarding arrangements, ensuring that other new college policies approved do not weaken the organisation's approach to safeguarding.

Assistant Principal Student Services: Responsibility for the day-to-day operational arrangements to support and monitor students with EHCPs and associated assessment of risk.

Monitoring, Evaluation & Review

This appendix will be reviewed and updated by the Group Director of Safeguarding/Senior Designated Safeguarding Lead as regularly and as required and will be submitted for approval to the Senior Leadership Team.

PEER-ON-PEER ABUSE

Aims

This appendix aims to confirm the College Group's position on peer-on-peer 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 peer-on-peer 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 that 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 peer on peer abuse?

Peer on peer 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);
- 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);
- 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 peer-on-peer abuse are defined as:

Peer: A person of similar age

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 Peer on Peer abuse

Peer on peer 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.

Peer on peer 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.