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Person Responsible: Vice-Principal Curriculum Innovation, Quality and Performance

SAFEGUARDING POLICY AND PROCEDURES 2023-2024

APPROVAL/CONSULTATION REQUIREMENTS

WHO BY	REQ?	DATE	WHO BY	REQ?	DATE
SLT (Updated to reflect COVID-19 Coventry College Closure)	Y <input checked="" type="checkbox"/>	05-09-23	Corporation	Y <input type="checkbox"/>	14-12-23
Health-Safety Comm.	Y <input type="checkbox"/>		Finance-Resources Comm.	Y <input type="checkbox"/>	
Trades Union	Y <input checked="" type="checkbox"/>		Audit Comm.	Y <input type="checkbox"/>	
Education-Standards Comm.	Y <input type="checkbox"/>		Remuneration Comm.	Y <input type="checkbox"/>	
POLICY LOCATION: Internal <input checked="" type="checkbox"/> Sharepoint External <input checked="" type="checkbox"/> College Website					
Designated Safeguarding Lead:	Patrick Geary Vice-Principal Curriculum Innovation, Quality and Performance				
Deputy Designated Safeguarding Lead:	Michala Gregory (Deputy Designated Safeguarding Lead)				
Named Governor for Safeguarding:	Rebecca Keeves				
Designated Lead for Children Looked After:	Collette Crowley (Pastoral Manager)				
Local Authority Designated Lead (LADO) for allegations against staff	Kirsty Wilshire E-mail: lado@coventry.gov.uk Telephone: 024 7697 5483				
Check Related Documents:	<ul style="list-style-type: none"> Safeguarding Strategic Group Action Plan 2023/2024 Prevent Strategy and Risk Assessment 2023/2024 Keeping Children Safe in Education (September 2023) Working Together to Safeguard Children (June 2018) Statutory Prevent Duty E-Safety Policy Stop and Search Policy Drugs and Alcohol Learner Policy Whistleblowing Policy and Procedure Staff Code of Conduct Lockdown Policy Learner Behaviour and Conduct Policy 				

1. INTRODUCTION

- 1.1 Coventry College is committed to safeguarding and aims to create a culture of vigilance, we expect everyone who works at the college to share this commitment. We recognise that safeguarding, child protection, and promoting the welfare of children is an essential part of our duty of care to all learners. As such, all staff and governors have a responsibility to provide a safe environment in which learners can learn and thrive.
- 1.2 We understand that safeguarding, child protection and promoting the welfare of all children is everyone's responsibility and that everyone has a role to play in protecting our young people and adults. We recognise that the college is part of a wider safeguarding system and work closely with other agencies to promote the welfare of children, young people and adults. We therefore maintain an attitude of '*it could happen here*' and will consider what is in the best interests of each person in line and upholding the Human

Rights Act 1998 and Equality Act 2010. Coventry College is also committed to ensuring freedom of speech in relation to Section 43 of the Education Act 1986,

- 1.3 The college pays close attention to, and works within the legislative safeguarding requirements documented in 'Keeping Children Safe in Education' (September 2023), and the statutory Prevent duty. No single practitioner can have a full picture of a young person/adults needs and circumstances. If children, young people, their families and vulnerable adults, are to receive the right help at the right time, everyone who comes into contact with them has a role to play in identifying concerns, sharing information and taking prompt action.
- 1.4 The college has a duty, under the *Children Act 1989*, to promote and safeguard the welfare of children under the age of 18. The *Education Act 2002* requires governing bodies of Further Education colleges to ensure that their functions are carried out with a view to safeguarding and promoting the welfare of children. The college also has a duty, under the Care Act 2014 to promote and safeguard the welfare of vulnerable adults.

1.4 Statutory Framework

In order to safeguard and promote the welfare of all, the college will act in accordance with the following legislation and statutory guidance:

- [Keeping Children Safe in Education – September 2023](#)
- [Working Together to Safeguard Children \(June 2018\) *](#)
- [What to do if you are worried a child is being abused: Advice for practitioners \(2015\)](#)
- [The Education Act 2002 \(section 175\)](#)
- [The Education \(Learner Information\) \(England\) Regulations 2005](#)
- [The Care Act 2014](#)
- [Dealing with Allegations of Abuse Against Teachers and Other Staff](#)
- [Safeguarding Vulnerable Adults Act 2006](#)
- [Procedures set out by the Coventry Safeguarding Children Partnership, and Coventry Safeguarding Adults Board](#)
- [Section 26 \(1\) of the Counter Terrorism and Security Act 2015](#)
- [Prevent Duty Guidance for Further Education Institutions 2015](#)
- [Mandatory Reporting of Female Genital Mutilation Oct 2015](#)
- [Controlling or Coercive Behaviour Statutory Guidance Framework Dec 2015](#)
- [Sharing nudes and semi-nudes: advice for education settings working with children and young people](#)
- [Information sharing Advice for practitioners providing safeguarding services to children, young people, parents, and carers](#)

Please note that there are a number of other documents (statutory and non-statutory) that inform our policy and practice. A list of these and links to professional bodies can be found in Annex B of Keeping Children Safe in Education (September 2023).

1.5 Safeguarding Definitions

Safeguarding is defined in "Keeping Children Safe in Education" (September 2023) for the purposes of this guidance as:

- Protecting children from maltreatment;
- Preventing impairment of children's mental and physical health or development;
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and

- Taking action to enable all children to have the best outcomes.
- **A child in need** is defined under the Children Act 1989 as a child who is unlikely to achieve or maintain a reasonable level of health or development, or whose health and development is likely to be significantly or further impaired, without the provision of services; or a child who is disabled. Local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare. Children in need may be assessed under section 17 of the Children Act 1989.
- For the purposes of this policy, **children** are defined as any individual who is under the age of 18.
- **'Child Protection'** is the intervention that occurs when children have been significantly harmed or are at risk of significant harm.
- **'Parent'** refers to birth parents and other adults in a parenting role for example adoptive parents, step parents and foster carers.
- **'Staff'** or 'members of staff' refers to all teaching, non-teaching, support, supply, peripatetic, contract staff, governors, volunteers and trustees working in or on behalf of the college
- We use the term 'victim', although it is recognised that not everyone considers themselves to be a victim or would want to be described in this way.
- We recognise the importance of not using the terminology of 'perpetrator' in relation to children in cases where the behaviour can be harmful to both parties. The appropriate use of terminology will be determined on a case-by-case basis.
- **"Early help"** means providing support as soon as a problem emerged at any point in a child's life, from the foundation years to the teenage years
- The college recognises that some adults are vulnerable to abuse. The *Care Act 2014* states that safeguarding responsibilities apply to any adult who:
 - has needs for care and support (whether or not the local authority is meeting any of those needs)
 - is experiencing, or at risk of abuse or neglect
 - as a result of those care and support needs, is unable to protect themselves from either the risk of, or the experience of abuse or neglect
- Sometimes, a single traumatic event may constitute **significant harm**, e.g. violent assault, suffocation or poisoning. More often, significant harm is a compilation of significant events, both acute and long-standing, which interrupt, change or damage the adult's physical and psychological development.

2. PURPOSE AND SCOPE

- 2.1 The purpose of this policy is to take all reasonable steps to promote and safeguard the welfare of any child or vulnerable adult engaged in college activity. Also, a commitment to keeping them safe

- 2.2 This policy provides a framework that informs procedures related to the college's statutory obligations to protect children and vulnerable adults who are suffering, or who are at risk of suffering abuse
- 2.3 Provides all members of staff with the information required to meet their safeguarding duty and protect children from harm
- 2.4 Provides stakeholders with clear information relating to College safeguarding Policy and Procedures.
- 2.5 Ensures that staff understand, can recognise and can respond to the indicators of abuse, exploitation or neglect.
- 2.6 This policy applies to all learners, staff, governors, temporary staff, host families, agency workers and volunteers
- 2.7 This policy also applies to any provision delivered by a sub-contractor or partner of the college

The College is committed to the following principles:

- 2.8 All children, young people and vulnerable adults have the right to be protected from harm.
- 2.9 They should feel safe and secure and cannot learn unless they do so.
- 2.10 All staff are responsible for keeping children, young people and vulnerable adults safe and have a responsibility to act if they think they are at risk of harm.
- 2.11 All staff take on a responsibility to promote children, young people and vulnerable adults' welfare
- 2.12 Providing support to families and/or children as soon as a problem emerges, is essential to improving outcomes for children and families.
- 2.13 Recognising that all children, young people and vulnerable adults may be vulnerable to abuse, but be aware that some have increased vulnerabilities due to special educational needs or disabilities or particular protected characteristics (LGBTQ+, etc)
- 2.14 Recognising the importance of providing LGBTQ+ children with a safe space for them to speak out or share their concerns with members of staff.

3. OBJECTIVES

- 3.1 To promote and safeguard the welfare of learners studying at Coventry College.
- 3.2 To provide staff, governors and learners with information on how to contact appropriately qualified and experienced members of staff, who are able to deal with all safeguarding concerns in a timely manner.
- 3.3 To enable staff and governors to take appropriate action if there is a cause for concern, and for Coventry College to play a full and active part in the multi-agency response to children's and vulnerable adults' protection concerns.
- 3.4 To ensure that all learners have a safe and stimulating environment in which they can fulfil their potential.

4. IMPLEMENTATION, MONITORING AND EVALUATION

3.1 The college will:

- Appoint a Designated Safeguarding Lead who will provide support to staff to carry out their safeguarding duties and who will liaise closely with other services such as children's social care.
- The college will identify learners that may benefit from early help and ensure that the most appropriate support is in place for the child.
- Address any situation where concerns arise regarding the safeguarding of children, young people under the age of 18, and vulnerable adults.
- Review this policy annually, and in response to major changes in legislation or significant events.
- Ensure that this policy is displayed on the college website and is accessible to all staff, learners, parents and carers, visitors and other stakeholders
- Provide members of the Corporation with a termly report in a manner which respects the confidentiality of the child or vulnerable adult, and that measures the impact of this policy and procedures.
- Provide appropriate training (in accordance with the guidance from Coventry Safeguarding Children's Partnership), to all staff annually, to ensure that they are aware their role in safeguarding children and vulnerable adults and the procedures they should follow should they have concerns.
- Recognise the college's duty of care, and that the child or vulnerable adult's welfare must be paramount. There will be circumstances, where it may be necessary to breach a person's confidentiality to protect them from harm. Learners must be informed of this position through College literature and reinforced by verbal explanations from staff.

5. REVIEW OF POLICY

5.1 The above policy will be reviewed by the relevant parties annually, or as required.

6. ENVIRONMENTAL IMPACT ASSESSMENT

6.1 The College is fully committed to the sustainability agenda.

6.2 All policies take into consideration, at the time of writing and approval with the Senior Leadership Team, their impact on the agenda.

6.3 Policies may not be approved or be amended if they impact significantly on our commitment to improving our carbon footprint and our corporate social responsibility.

7. GENERAL DATA PROTECTION REGULATION (GDPR)

7.1 All policies which are approved by the Senior Leadership Team are in line with our GDPR suite of policies and procedure.

8. LIST OF APPENDICES

Appendix 1:	Safeguarding roles and responsibilities
Appendix 2:	Safeguarding procedures and guidance for staff
Appendix 3:	What to do if you suspect abuse
Appendix 4:	Allegations of abuse against members of staff
Appendix 5:	How to protect yourself from false allegations of abuse
Appendix 6:	Guidance notes on staff-learner relationships
Appendix 7:	Preventing violent extremism and radicalisation
Appendix 8:	Further information
Appendix 9:	Stop and search
Appendix 10:	The use of reasonable force
Appendix 11:	Storage of medication
Appendix 12:	Peer on Peer Abuse – known as Child on Child – KCSiE 2023 (including bullying, cyber-bullying, sexting, sexual violence, up skirting and sexual harassment)

SAFEGUARDING ROLES AND RESPONSIBILITIES

1.1 All Staff:

All staff should be aware of systems within the college which support safeguarding, and these should be explained to them as part of staff induction. All staff should:

- Make themselves familiar with the college's Safeguarding Policy and Procedures, which will be provided at induction, and is available on the college Moodle and website.
- Will be provided with and read Part 1/Annex A of Keeping Children Safe in Education (September 2023), which can be found on the college Moodle, and CPOMS library, as part of annual training expectations, and will be circulated to all staff when updates are released.
- Be alert to the signs of abuse as detailed and act in accordance with this policy if a learner presents with indicators of abuse.
- Report any concerns immediately to any of the safeguarding officers or the designated senior lead for safeguarding and identify children who may benefit from early help.
- Raise concerns about poor or unsafe practice with the Designated Safeguarding Lead.
- Understand the college's procedure for dealing with peer-on-peer abuse.
- Safeguarding response to children who are absent from education, particularly on repeat occasions and/or prolonged periods. Being absent, as well as missing, from education can be warning sign of a range of safeguarding concerns, including sexual abuse, sexual exploitation or child criminal exploitation
- Have a responsibility to provide a safe environment, where children can learn;
- Should know what to do if a child tells them that he/she is being abused or neglected; but that children may not feel ready or know how to tell someone that they are being abuse, exploited or neglected and/or recognise their experience as harmful;
- Will be aware of indicators of Peer on Peer also known as child-on-child abuse and procedures to deal with this;
- All staff, but especially the DSL and deputies, will also consider whether children/young people are at risk of abuse or exploitation in situations outside their families
- Understands the referral process to the (LADO) and the role they play should they have concerns or allegations are made against any member of staff;
- Should always seek advice from the Designated Safeguarding Lead if they are unsure; and
- All teachers should safeguard children's wellbeing and maintain public trust in the teaching profession as part of their professional duties (Teaching Standards, 2012).
- Will be able to identify indicators of abuse
- Receive annually updated training on their safeguarding roles and responsibilities;
- Should have an awareness of safeguarding issues that put children at risk of harm and behaviours associated with these risks;
- Should know what to do if a child makes a disclosure of abuse and never promise confidentiality when a child makes a disclosure;
- Will be made aware of the early help process and understand their role in it;
- All staff will receive appropriate safeguarding and child protection training (including online safety which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring at induction.
- The training will be regularly updated. In addition, all staff should receive safeguarding and child protection (including online safety) updates (for example, via email, e-bulletins, and staff meetings), as required, and at least annually, to continue to provide them with relevant skills and knowledge to safeguard children effectively and as part of continuous professional development;
- Should be able to contribute to the development of safeguarding policy and practice.

1.2 The Principal and Chief Executive Officer (CEO) will:

- Ensure that the policies and procedures are adopted by the governing body and are appropriately monitored by the Designated Safeguarding Lead in relation to their safeguarding responsibilities.

1.3 The Designated Senior Lead for Safeguarding will:

- The designated safeguarding lead should take lead responsibility for safeguarding and child protection (including online safety and understanding the filtering and monitoring systems and processes in place). This should be explicit in the role holder's job description
- Act as the point of contact for all matters concerning Safeguarding in relation to learners, co-ordinate action within the college, and liaise with external agencies where appropriate.
- Help to promote educational outcomes of children who have experienced or are experiencing safeguarding or child protection issues by sharing relevant information with staff and the senior leadership team;
- Promote a 'culture of safeguarding', in which every member of the college community acts in the best interests of the child;
- Monitor all safeguarding concerns and ensure that these are followed up in a professional and timely manner.
- Ensure that appropriate strategies for recording and reporting incidents are in place and reviewed regularly.
- Act as a source of support, advice and expertise to staff on all matters of safeguarding, including supporting staff when they are deciding whether to make a referral to an external agency including a referral to the Channel programme where there is a radicalisation concern.
- Encourage a culture of listening to children and taking account of their wishes and feelings, among all staff.
- Liaise with the Principal and Chief Executive Officer (CEO) to inform them of issues, especially on-going enquiries under section 47 of the Children Act 1989, and police investigations.
- Ensure that there is an appropriately qualified Safeguarding team in place across the College.
- Ensure that all those within the college, including Governors, are familiar with the college's Safeguarding Policy and Procedures, and that this is reviewed and updated annually.
- Ensure the Safeguarding Policy and Procedure is available publicly, and parents are aware of the fact that referrals about suspected abuse or neglect may be made, and the role of the college in this.
- Link with the Coventry Safeguarding Children Partnership to make sure staff are aware of training opportunities and the latest local policies on safeguarding.
- Liaise with Human Resources to ensure that the college complies with its responsibilities with regard to training staff and Governors on safeguarding.
- Liaise with families and the appropriate child protection agencies on individual cases and make referrals to appropriate agencies in consultation with the Local Authority Designated Lead.
- Ensure that appropriate action is taken to exclude, refuse admission or employment, to any individual who may pose a risk to children or vulnerable adults.
- Ensure that all staff are aware of the early help that is available within the college and externally and support staff to access this as appropriate.
- Undertake every 2 years appropriate training relevant to the role of the designated senior lead for safeguarding and Prevent.
- Ensure all staff have read and understood Part 1 and Annex A of Keeping Children Safe in Education (September 2023)
- Further details on the role of the Designated Safeguarding Lead can be found in Annex B of Keeping Children Safe in Education (September 2023).
- Update their knowledge and skills regularly and keep up with any developments relevant to their role;
- Provide staff in college with the knowledge, skills and support required to safeguard children;
- Take responsibility for the accurate and timely recording of safeguarding and child protection concerns and take overall responsibility for safeguarding and child protection files;

- Take responsibility for the transfer of safeguarding files when a child leaves the college;
- Attend or ensure an appropriate representative attends multi-agency safeguarding or child protection meetings;

The college will have regard to 'When to call the police' guidance from the National Police Chief's Council.

1.4 The Safeguarding team will:

- Ensure that staff receive regular training and updates on current safeguarding practice.
- Ensure that they follow up any safeguarding concerns reported to them, and that they are dealt with in a timely and professional manner.
- Make appropriate referrals to Social/Community Services and/or the Police, where there are concerns that the child or vulnerable adult is or may be, being abused.
- Ensure all incidents on CPOMS are actioned and noted within 3 working days of receipt
- Acknowledge the receipt of all safeguarding referrals and provide feedback to the referee where appropriate.

1.5 Human Resources will:

The college is committed to providing children with a safe environment, in which they can learn. We are committed and take safer recruitment seriously; all staff are subject to the following checks;

- Identity check;
 - DBS clearance;
 - Prohibition from teaching checks (where required);
 - Barred List check;
 - Section 128 checks (as required - leadership and management);
 - Reference check (two references required);
 - Professional qualifications check;
 - Right to work in the UK check;
 - Further checks for those who have lived outside the UK;
 - Disqualification Under the Childcare Act 2006 checks (as required).
 - Online search for all candidates that are to be offered a role at the College.
- A record of all checks on members of staff will be held on the Single Central Record.
 - All new members of staff will be required to obtain DBS clearance. The college reserves the right to re-check DBS clearance for any member of staff where information is received that indicates that they may pose a risk to children.
 - At least one member of every interview panel will have undergone Safer Recruitment training.
 - We take proportionate decisions on whether to check individuals beyond what is required.
 - Any visitor to the college who has not been subject to the necessary checks will be supervised at all times.
 - All safer recruitment practices at the college comply with Keeping Children Safe in Education (September 2023). See Part 3 for further information.
 - Monitor compliance with the DBS Policy and Procedure by ensuring that there are sound arrangements for appropriate checks on staff (including List 99 checks and DBS checks).
 - Maintain a single central record of all checks on staff, including agency staff and volunteers.
 - Ensure that appropriate action is taken to refuse employment to any individual who may pose a risk to children or vulnerable adults.
 - Ensure that risk assessments are completed for new staff that don't have a completed DBS check in place on commencement of employment.

- To notify the Local Authority Designated Lead Officer (LADO) of any allegations made against a member of staff and to instigate appropriate College HR processes where appropriate.
- Nominate a member of senior staff to oversee the investigation of any member of staff who is deemed to have breached safeguarding legal requirements, as per the contractual obligations

See Coventry College Safer Recruitment policy for further details

NB; DBS checks for Volunteers are free

1.6 The Governing Body

The Governing body have a strategic leadership responsibility for the college's safeguarding arrangements and must ensure that they comply with their duties under legislation. They must have regard to this guidance, ensuring policies, procedures and training in the college are effective and comply with the law at all times. The Principals should ensure that the policies and procedures, adopted by their governing bodies, (particularly those concerning referrals of cases of suspected abuse and neglect), are understood, and followed by all staff.

The Governing body should ensure that all governors and trustees receive appropriate safeguarding and child protection (including online) training at induction. This training should equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place in the college are effective and support the delivery of a robust whole

The Governing body should be aware of their obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty), and their local multi-agency safeguarding arrangements

- Appoint a member of the College's Senior Leadership team to the role of Designated Safeguarding Lead to take leadership responsibility for their college's or college's safeguarding arrangements
- Nominate a member of the governing body to liaise with the Designated Safeguarding Lead.
- Ensure that the college has the following policies and procedures in place;
 - A safeguarding policy which complies with the statutory guidance and is updated annually.
 - A staff behaviour policy which includes acceptable use of technologies, staff- learner relationships and communications including the use of social media
 - Recruitment and selection policies and procedures in place which prevent people who pose a risk of harm from working with children, young people and vulnerable adults
- Ensure that the College contributes to inter-agency working, in line with the statutory guidance Working Together to Safeguard Children.
- Monitor safeguarding arrangements to ensure that they take into account the procedures and practices set up by the Coventry Safeguarding Children Partnership
- Ensure that the college takes into account local authority and Coventry Safeguarding Children Partnership policies and supply information as requested by the three safeguarding partners (the Local Authority, a clinical commissioning group for an area within the local authority and the chief office of police for a police area within the local authority)
- Ensure that there is an appropriate safeguarding response to any children who go missing from education.
- Appoint a designated teacher to promote the educational achievement of children who are looked after.
- Ensure that learners are taught about keeping themselves safe, in a way that is appropriate to their age and understanding.
- Consider a whole-college approach to online safety, including the use of mobile technology at college

- Ensure that there are clear systems and processes in place for identifying when children may be experiencing mental health problems;
- Ensure that any member of staff found not suitable to work with learners, will be notified to the Disclosure and Barring Service (DBS) for consideration for barring.
- Ensure that there are procedures in place to handle allegations against the Senior Leadership Team, members of staff, volunteers and other children.
- Ensure that the college takes into account Local Authority and Coventry Safeguarding Children Partnership policies and supply information as requested by the three safeguarding partners (the Local Authority, a clinical commissioning group for an area within the local authority and the chief office of police for a police area within the local authority).
- Part 2 of Keeping Children Safe in Education (September 2023) sets out the responsibilities of governing bodies.

1.7 Operational Prevent lead will:

- Deliver training on Prevent for all new staff at the college as part of the probation period.
- Liaise with the Prevent Co-ordinator (Manjeet Pangli) and West Midlands Counter Terrorism Police to discuss any concerns and make referrals as appropriate.
- Refer all Prevent referrals that become part of the Channel process to the ESFA, as per the funding guidance.
- Provide refresher training for all staff on Prevent.

1.8 Children Looked After (CLA)

The most common reason for children, young people to be looked-after is because they have experienced abuse and/or neglect. The College recognises that children and young people looked after may have additional vulnerabilities by virtue of this.

Staff will receive training on how to best safeguard children and young people who are Looked-After and who have been previously Looked-After.

The college is committed to working with other agencies to ensure the best outcomes for Looked-After and Previously Looked-After children.

1.9 Multi-Agency Working

- The college is committed to multi-agency working and operates under Working Together to Safeguard Children (2018) and local safeguarding arrangements.
- The college will work with social care, the police, health services, local Early Help practitioners and other relevant agencies to promote the welfare of children and protect them from harm.
- We work closely with our local Family Hub to ensure children receive appropriate, co-ordinated Early Help (insert details here).
- The Coventry Safeguarding Children Partnership (CSCP) have designated that colleges and colleges are a named 'relevant agency'. As such, the college is under a statutory duty to co-operate with published CSCP arrangements (including responding to the Coventry Safeguarding Children Partnership's annual safeguarding audit).

SAFEGUARDING PROCEDURES AND GUIDANCE FOR STAFF

All members of staff working at the College have a responsibility to be mindful of issues related to their safety and welfare, and a **duty** to report and refer any concerns however “minor” they appear to be.

In cases where it is deemed that a child or vulnerable person lacks sufficient understanding to make informed decisions about his/her own care and treatment, parents/carers have a right to be informed of any concerns about the child's/vulnerable person's welfare, or of any action taken to safeguard and promote the child's/vulnerable adult's welfare, providing this does not compromise the child's/vulnerable adult's safety.

Where there are possible concerns about a child's/vulnerable adult's safety, unconditional confidentiality cannot be guaranteed and should not be offered.

The college will be proactive and take positive steps to inform learners of their rights to safety and protection, and the options available to express their fears or concerns.

Learners away from college premises, e.g. on work experience, will be given advice on who to contact, and how to contact them should they have concerns or suffer abuse.

The college recognises that abuse can take many different forms. Staff will also receive training on the following issues and action will be taken if the college believes that a child or vulnerable adult is at risk of or is the victim of;

- physical abuse
- sexual abuse
- emotional abuse
- neglect
- radicalisation and extremism
- bullying, including cyber- or online-bullying
- child sexual exploitation
- child criminal exploitation (including involvement in county lines)
- domestic abuse
- upskirting
- fabricated or induced illness
- faith-based abuse
- female genital mutilation (A form of so-called ‘honour-based’ abuse)
- forced marriage; (A form of so-called ‘honour-based’ abuse)
- gangs or youth violence
- gender-based violence
- hate
- radicalisation
- relationship abuse
- serious violence
- sexual violence or sexual harassment (including peer on peer – child on child abuse);
- sexting
- so-called ‘honour-based’ violence
- trafficking and modern slavery
- homelessness

1. **What is abuse? Signs and Symptoms of Abuse and Neglect** (Keeping Children Safe in Education (September 2023) Appendix B

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. Harm can include ill treatment that is not physical as

well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others (e.g. via the internet). They may be abused by an adult or adults or by another child or children, Harm' can include 'witnessing harm to others', for example, in domestic abuse

- 1.1 As outlined above, all staff will be trained in indicators of abuse, exploitation and neglect and should be able to recognise signs of these. We recognise that abuse, exploitation and neglect along with other safeguarding issues are complex and often multidimensional and therefore don't fall solely under one category. Types of abuse or harm can take many forms including directly inflicting harm on a child or failing to protect a child from harm online as well as face to face both inside and outside of the college as well as the multi-faceted occurrence of factors causing emotional harm.

The four main types of abuse that staff are trained to recognise are;

- Physical abuse;
 - Sexual abuse;
 - Emotional abuse;
 - Neglect.
- 1.2 **Physical Abuse** a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.
- 1.3 **Emotional Abuse** is the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning, or preventing the child from participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.
- 1.4 **Sexual Abuse** involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.
- 1.5 **Neglect** is 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. Draft for consultation Neglect may occur during pregnancy, for example, as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure

adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

1.6 **Child sexual exploitation (CSE)** is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology. Further information about Child Sexual Exploitation can be found in paragraph 28 of Keeping Children Safe in Education 2023

1.7 **Domestic Abuse** in April 2021, the Domestic Abuse Act 2021 received Royal Assent and introduced a statutory definition for the first time. The Domestic Abuse Act 2021 (Part 1) defines domestic abuse as any of the following behaviours, either as a pattern of behaviour, or as a single incident, between two people over the age of 16, who are 'personally connected' to each other:

- (a) physical or sexual abuse;
- (b) violent or threatening behaviour;
- (c) controlling or coercive behaviour;
- (d) economic abuse (adverse effect of the victim to acquire, use or maintain money or other property; or obtain goods or services); and
- (e) Psychological, emotional or other abuse.

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

People are 'personally connected' when they are, or have been married to each other or civil partners; or have agreed to marry or become civil partners. If the two people have been in an intimate relationship with each other, have shared parental responsibility for the same child, or they are relatives. The definition of Domestic Abuse applies to children if they see or hear, or experience the effects of, the abuse; and they are related to the abusive person. (The definition can be found here: <https://www.legislation.gov.uk/ukpga/2021/17/part/1/enacted>)

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child/adolescent to parent violence and abuse. Anyone can be a victim of domestic abuse, regardless of sexual identity, age, ethnicity, socio-economic status, sexuality or background and domestic abuse can take place inside or outside of the home.

College is part of Operation Encompass, information will be received directly from the police to notify of DV issues

The National Domestic Abuse helpline can be called free of charge and in confidence, 24 hours a day on 0808 2000 247.

1.8 **Female genital mutilation (FGM).** Female genital mutilation refers to procedures that intentionally alter or cause injury to the female genital organs for non-medical reasons. The practice is illegal in the UK. FGM typically takes place between birth and around 15 years old; however, it is believed that the majority of cases happen between the ages of 5 and 8. Risk factors for FGM include:

- low level of integration into UK society

- mother or a sister who has undergone FGM
- girls who are withdrawn from PSHE
- visiting female elder from the country of origin
- being taken on a long holiday to the country of origin
- talk about a 'special' procedure to become a woman

Symptoms of FGM

FGM may be likely if there is a visiting female elder, there is talk of a special procedure or celebration to become a woman, or parents wish to take their daughter out-of-college to visit an 'at-risk' country (especially before the summer holidays), or parents who wish to withdraw their children from learning about FGM. Staff should not assume that FGM only happens outside the UK.

Indications that FGM may have already taken place may include:

- difficulty walking, sitting or standing and may even look uncomfortable.
- spending longer than normal in the bathroom or toilet due to difficulties urinating.
- spending long periods of time away from a classroom during the day with bladder or menstrual problems.
- frequent urinary, menstrual or stomach problems.
- prolonged or repeated absences from college or college, especially with noticeable behaviour changes (e.g. withdrawal or depression) on the girl's return
- reluctance to undergo normal medical examinations.
- confiding in a professional without being explicit about the problem due to embarrassment or fear.
- talking about pain or discomfort between her legs

There are other familial issues that can have a detrimental impact on children.

We work with other agencies in line with Keeping Children Safe in Education (2023) to support children and families in the following circumstances;

- Children facing the court procedures and/or children in the court system;
- Children with family members in prison;
- Children who are homeless;
- Children who need a social worker.

Child potentially at greater risk of harm

The college recognises that some children need a social worker due to abuse, neglect or family circumstances and that abuse and trauma can leave children vulnerable to further harm, as well as educational disadvantage.

The Designated Safeguarding Lead will hold information relating to social workers working with children in the college.

This information will inform decisions about safeguarding and promoting welfare (including the provision of pastoral and/or academic support).

Special educational needs or disabilities (SEND)

As outlined in Keeping Children Safe in Education (2023), The College is aware that children with additional needs or disabilities may be more vulnerable to abuse and additional barriers may exist when recognising abuse (both on and off line) and neglect. Governing bodies and proprietors should ensure their child protection policy reflects the fact that additional barriers can exist when recognising abuse and neglect in this group of children.

This could be because;

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's, young person's condition without further exploration;
- being more prone to peer group isolation or bullying (including prejudice-based bullying) than others;
- the potential for children, young people with SEND or certain medical conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs; and
- communication barriers and difficulties in managing or reporting these challenges

Any reports of abuse involving children with SEND will therefore require close liaison with the designated safeguarding lead and ALS Manager. Staff will also be trained in recognising signs of abuse in children and young people/vulnerable adults with SEN and disabilities or certain medical conditions.

Staff will consider the needs of a child, young person when responding to concerns of abuse or when taking a disclosure. We recognise that some children require specialist intervention to communicate and advice from the ALS Manager will be sought in these circumstances.

Safeguarding learning opportunities within the curriculum will be appropriately differentiated to ensure all children, young people and vulnerable can access it.

Coventry College provides Personal Development and Wellbeing Coaches and pastoral support and attention for these learners, along with ensuring any appropriate support for communication is in place through the Additional Learning Support team, following assessment.

Mental Health

The college recognises that safeguarding and promoting the welfare of children/young people includes preventing the impairment of their mental health or development.

All staff will be aware that mental health problems may be an indicator that a child/young person is suffering or is at risk of suffering abuse, neglect or exploitation.

Staff will not attempt to make a diagnosis of a mental health problem unless they are appropriately trained.

We recognise that staff are well-placed to observe behaviour that may indicate that a child is experiencing a mental health problem, or is at risk of developing one. There are clear systems and processes in place for identifying possible mental health problems. If staff are concerned that a child is suffering a mental health problem, they should follow the college referral process. If staff are concerned that a child is experiencing a mental health problem that is also a safeguarding concern, they must report this to the Designated Safeguarding Lead (or deputy Designated Safeguarding Lead) immediately.

Further information, guidance and advice regarding mental health can be found on page 44 of Keeping Children Safe in Education 2023.

Promoting safeguarding and welfare in the curriculum

Coventry College plays a crucial role in preventative education. Preventative education is most effective in the context of a whole college approach that prepares learners for life in modern Britain and creates a culture of zero tolerance for sexism, misogyny/misandry, homophobia, biphobic and sexual violence/harassment. The college will have a clear set of values and standards, upheld and demonstrated throughout all aspects of college life. These will be underpinned by the college behaviour policy and pastoral support system, as well as by a planned programme of evidence

2. Online safety

- 2.1 The college recognises the importance of safeguarding learners from potentially harmful and inappropriate online material. Therefore, it will ensure appropriate filters and monitoring systems are in place to protect learners from accessing harmful or inappropriate material via the college's IT system, and to flag up where access to inappropriate materials has taken place or has been attempted.

The College also recognises that in today's world, children/young people need to be safeguarded from potentially harmful and inappropriate online material with many of them having unlimited and unrestricted access to the internet via their mobile phone. The breadth of issues can be categorised currently into four Core areas of risk as taken from Keeping Children Safe in Education 2023:

1. **Content** – being exposed to illegal, inappropriate, or harmful content (pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation, and extremism)
2. **Contact** – being subject to harmful online interaction with other users (peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit)
3. **Conduct** – online behaviour that increases the likelihood of, or causes, harm (making, sending and receiving explicit images)
4. **Commerce** – risks such as online gambling, inappropriate advertising, phishing and or financial scams

The college understands that the above can take place on a learner's phone or smart device (including smart watches) whilst at college or elsewhere. The college has responded to this by having a whole college approach to online safety which aims to protect and educate its learners, parents/carers and staff in their use of technology

The College has also established mechanisms to identify, intervene in and escalate any concerns highlighted through our filter and monitoring systems for both staff and learners. The effectiveness of this is regularly reviewed with staff aware of how to escalate concerns.

All staff should receive training on the expectations, applicable roles and responsibilities in relation to filtering and monitoring.

The designated safeguarding lead takes lead responsibility for understanding the filtering and monitoring systems and processes in place.

The guidance signposts the Department for Education's new filtering and monitoring standards (DfE, 2023b), which support college to have effective systems in place.

Schools and colleges should consider meeting the DfE's Cyber security standards for schools and colleges (DfE, 2023c).

Further information regarding online safety can be found in the College E-Safety Policy/Unacceptable use.

3. Confidentiality

- 3.1 Safeguarding information should be treated as confidential and only shared as part of the protocols agreed by the college and Coventry Safeguarding Children Partnership. All staff/governors/volunteers in college have a responsibility to share relevant information about the protection of children with other professionals. Staff/governors/volunteers who

receive information about children and their families in the course of their work, shall only share that information within appropriate contexts.

4. Safer recruitment of staff

- 4.1 Coventry College undertakes to ensure that their staff are fit to work in a college setting with children and vulnerable adults. It reserves the right to refuse to employ anyone whom it has reasonable belief may pose a risk to its learners. KCSIE Sept 2023 updated guidance clarifies that a curriculum vitae (CV) should only be accepted alongside a full application form and is not sufficient on its own to support safer recruitment. Also, that that schools and colleges should inform shortlisted candidates that online searches may be carried out as part of due diligence checks.

All safer recruitment practices at the college comply with Keeping Children Safe in Education (September 2023). *See Part 3 for further information.* Refer to the College Safer Recruitment policy for further details.

The college is committed to providing all learners with a safe environment, in which they can learn. We take safer recruitment seriously and all staff are subject to the following checks;

- Identity check;
 - DBS clearance;
 - Prohibition from teaching checks (where required);
 - Barred List check;
 - Section 128 checks (as required - leadership and management);
 - Reference check (two references required);
 - Professional qualifications check;
 - Right to work in the UK check;
 - Further checks for those who have lived outside the UK;
 - Disqualification Under the Childcare Act 2006 checks (as required); and
 - Verification of the candidate's mental and physical fitness may also be sought.
- 4.2 A record of all checks completed for members of staff will be recorded on the Single Central Record.
- 4.3 All new members of staff will be required to obtain DBS clearance. The college reserves the right to re-check DBS clearance for any member of staff where information is received that indicates they may pose a risk to children and will request candidates to register on the DBS update service.
- 4.4 At least one member of every interview panel will have undertaken Safer Recruitment training which it is recommended is refreshed every 2 years.
- 4.5 We take proportionate decisions on whether to check individuals above and beyond what is legally required dependant on individual circumstance.
- 4.6 Any visitor to the college who has not been subject to the necessary checks will be supervised at all times and a risk assessment completed.

5. Staff Development and Training

- 5.1 In order for staff to be able to understand and discharge their safeguarding and child protection duties, the college has committed to training staff throughout the academic year. All staff members will be made aware of the college safeguarding processes and structures and will receive training on these as part of their induction. As part of this

training and their annual refresher, they will also receive The Safeguarding Policy and Procedures, Copies of Keeping Children Safe in Education (September 2023) and/or Part 1 and Annex A

- 5.2 All staff within the college will undergo training so that they are fully aware of this policy and their responsibilities. This training will be updated every year. Training will include members of the college community not employed directly by the college, to include security and catering staff, along with members of the governing body
- 5.3 Designated Safeguarding Officers will receive additional training so that they can effectively fulfil their responsibilities to the protection of vulnerable adults at the college. This training will be updated annually.
- 5.4 Training will consist of mandatory online safeguarding level 2 modules for all current and new member's staff and where appropriate face to face workshops will be organised

6. What should staff do if they have concerns about safeguarding practices within the College - Whistleblowing

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

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

- General guidance can be found at: Advice on whistleblowing.
- The NSPCC whistleblowing helpline is available as an alternative route for staff who do not feel able to raise concerns regarding child protection failures internally or have concerns about the way a concern is being handled by the college. Staff can call 0800 028 0285 – line is available from 8:00 AM to 8:00 PM, Monday to Friday and email: help@nspcc.org.uk

SAFEGUARDING PROCEDURES AND GUIDANCE FOR STAFF – WHAT TO DO IF YOU SUSPECT ABUSE

1. If it is believed that a learner is suffering or may be at risk of suffering significant harm, even in the absence of any physical evidence, this must be brought to the attention of a Safeguarding Lead/Designated Senior Safeguarding Lead, who will liaise with the statutory bodies immediately, or as a minimum within 24 hours, in writing, or with written confirmation of a telephone referral. In cases of serious harm, the police will be informed from the outset.
2. **If a learner makes a disclosure about abuse, staff must do the following:**
 - Allow the learner to lead the discussion, never stop a learner who is freely recounting significant events, and do not press for details by asking questions e.g. “what did they do next?”
 - Listen and be supportive – staff should not investigate, put words in the learner’s mouth or ask leading questions. Questions such as “Is there anything else you’d like to tell me?” may be used as part of a discussion.
 - Accept what the learner says without challenge - staff should reassure them that they are doing the right thing, and that they recognise the difficulty of the situation.
 - Not lay blame or criticise either the learner or the alleged perpetrator.
 - Never promise complete confidentiality – staff should advise learners that they will be passing the information on to the appropriate person in the college in order to keep them and other learners safe.
 - Report the information immediately to the Safeguarding Lead/Designated Senior Safeguarding Lead, and do not discuss the matter with anyone else unless requested to do so by the Designated Lead for safeguarding.
 - Write an account of the conversation immediately afterwards, including the time, date and location of the conversation, and the name of anyone else present. This should be signed and handed to the Safeguarding Lead/Designated Senior Safeguarding Lead as soon as possible.
 - Follow up with the Designated Senior Lead if you have further concerns.
 - Remember that it is not the responsibility of the college to investigate suspected cases of abuse. It is, however, the college’s responsibility to follow local safeguarding procedures, and to recognise that a learner making a disclosure, may be the beginning of a legal process as well as the process of recovery for the young person or vulnerable adult.
 - Legal action against the perpetrator can be seriously damaged by any suggestion that the victim’s account has, in any way, been influenced by the person they may have told.
3. **Allegations of peer-on-peer abuse** (also known as Child on Child)
 - 3.1 Staff should recognise that young people and vulnerable adults may also be vulnerable to physical, sexual and emotional bullying and abuse by their peers. There is no clear boundary between incidents that should be regarded as abusive, and incidents that are more properly dealt with as bullying, sexual experimentation, etc. However, it may be appropriate to regard an individual’s behaviour as abusive if:
 - There is a large difference in power (for example age, size, ability, development) between the individuals concerned; or
 - The perpetrator has repeatedly tried to harm one or more other young/vulnerable people; or
 - There are concerns about the intention of the alleged perpetrator.
 - 3.2 If the evidence suggests that there was an intention to cause severe harm to the victim, this should be regarded as abusive whether or not severe harm was actually caused. College staff should not automatically dismiss some abusive behaviour as 'normal' between learners. Concerns must be raised with the Designated Safeguarding Lead or one of the safeguarding deputies using the safeguarding referral process.

ALLEGATIONS OF ABUSE AGAINST MEMBERS OF STAFF

Coventry College takes all safeguarding matters including low level concerns and/or allegations that harm to a child has occurred against staff seriously and will manage them in line with this policy, Part Four of Keeping Children Safe in Education (September 2023) and the CSCP Guidance, '[Allegations Against Staff and Volunteers](#)'.

Any concerns about the conduct of a member of staff, supply teachers, volunteers or contractors should be reported to the Vice Principal Curriculum Innovation, Quality and Performance. Concerns may come from various sources, for example, a suspicion; complaint; or disclosure made by a child, parent or other adult within or outside of the organisation; or as a result of vetting checks undertaken.

The Vice Principal Curriculum Innovation, Quality and Performance or Chair of Governors should consider if the concern or allegation meets the harms threshold for Designated Officer intervention and seek guidance/advice if unsure by emailing lado@coventry.gov.uk. The details of the LADO can be found on the front of this policy. Immediate referrals can be made via the following link https://www.coventry.gov.uk/info/206/coventry_safeguarding_children_partnership/2628/local_authority_designated_officer_lado

The Vice Principal Curriculum Innovation, Quality and Performance has to decide whether the concern is an allegation or low-level concern. The term 'low-level' concern does not mean that it is insignificant, it means that the behaviour towards a child does not meet the threshold for referral to the Local Authority Designated Officer (LADO)

Guidance also clarifies that low level concerns which are shared about supply staff and contractors should be notified to their employers; and schools and colleges should consult with their LADO if unsure whether low-level concerns shared about a member of staff meet the harm threshold.

1. These procedures should be used in all cases in which it is alleged that a member of staff this includes supply staff, volunteers and all staff outlined in this policy, has:
 - Behaved in a way that has harmed, or may have harmed, a young person or vulnerable adult;
 - Possibly committed a criminal offence against, or related to a young person or vulnerable adult; or
 - Behaved towards a young person or vulnerable adult in a way that indicates he/she would pose a risk of harm.
 - Staff behaving towards a child or children in a way that indicates they may not be suitable to work with children;
 - Staff behaving or possibly behaving in a way that indicates they may not be suitable to work with children.
 - Concerns relating to a position of trust issue will be referred to the Local Authority designated officer within 24 hours.
 - If a child has suffered or may have suffered abuse or harm, a MASH referral will also be made
 - Before contacting the LADO, colleges will conduct basic enquiries in line with local procedures to establish the facts to help them determine whether there is any foundation to the allegation, being careful not to jeopardise any future police investigation.
 - The LADO's role is not to investigate the allegation, but to ensure that an appropriate investigation is carried out, whether that is by the police, children's social care, the college or college, or a combination of these.
 - A referral to the Disclosure and Barring Service will be made if a member of staff is dismissed or removed from their post as a result of safeguarding concerns, **irrespective of whether they have resigned.**

Low-level Concerns

Concerns may be graded Low-level if the concern does not meet the criteria for an allegation; and the person* has acted in a way that is inconsistent with the staff code of conduct, including inappropriate conduct outside of work. Example behaviours include, but are not limited to:

- being over friendly with learners;
- having favourites;
- taking photographs of children on their mobile phone;
- engaging with a learner on a one-to-one basis in a secluded area or behind a closed door; or,
- using inappropriate sexualised, intimidating or offensive language.

College should ensure that their Code of Conduct is clear about what low-level concerns are and why it is important that such concerns are shared.

If the concern has been raised via a third party, the principal should collect as much evidence as possible by speaking:

- directly to the person who raised the concern, unless it has been raised anonymously;
- to the individual involved and any witnesses.
- Reports about supply staff and contractors should be notified to their employers, so any potential patterns of inappropriate behaviour can be identified.

Staff should be encouraged and feel confident to self-refer, where, for example, they have found themselves in a situation which could be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards.

Low-level concerns should be recorded in writing, including:

- name* of individual sharing their concerns
- details of the concern
- context in which the concern arose
- action taken

(* if the individual wishes to remain anonymous then that should be respected as far as reasonably possible)

Records must be kept confidential, held securely and comply with the Data Protection Act 2018. It is recommended that record is kept at least until the individual leaves their employment. Records should be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified.

If a concerning pattern of behaviour is identified and now meets the criteria for an allegation, then the matter should be referred to the LADO.

Developing and implementing a low-level concerns policy (Farrer & Co)

<https://www.farrer.co.uk/globalassets/clients-and-sectors/safeguarding/low-level-concerns-guidance-2020.pdf>

2. Supply Teachers – Agency Staff

- 2.1 Although the college does not directly employ supply teachers, the college will ensure that any concerns or allegations against supply teachers and contractors, the college will ensure that any concerns or allegations are **referred to LADO and the relevant agency informed as the employer.**

- 2.2 Governing bodies/proprietors will liaise with the supply agency to determine whether to suspend or
- 2.3 The college will inform supply agencies of its process for managing allegations, including inviting the agency's human resource manager (or equivalent) to meetings and regularly updating agencies on relevant college policies.
- 2.4 The college also has a duty of care to its employees, and will act to manage and minimise the stress inherent in the allegations process. Support will be made available to anyone facing an allegation; such support may include access to counselling/medical advice, or, where applicable, support from a trade union representative or work place colleague. It is essential that any allegation of abuse made against a member of staff is dealt with very quickly, in a fair and consistent way that provides effective protection for the young person/vulnerable adult, and at the same time supports the person who is the subject of the allegation.

Governors

If an allegation or concern is about a Governor, the college will follow local procedures

Volunteers

Risk assessments and a DBS check will be requested for all volunteers. Under no circumstances will a volunteer prior to satisfactory checks being completed be alone with children unsupervised or allowed to work in regulated activity.

3. Receiving an Allegation from a young person or vulnerable adult

- 3.1 If a member of staff receives an allegation against a member of staff, this should be reported immediately to Vice Principal Curriculum Innovation, Quality and Performance, unless this manager is the person against whom the allegation is made. Therefore, in these circumstances, the report should be made to the Principal and Chief Executive Officer (CEO)
- 3.2 In the event of the Principal and Chief Executive Officer (CEO) being unavailable, the allegation will be reported to the Designated Safeguarding Lead, the Vice Principal Curriculum Innovation, Quality and Performance will be subsequently notified of the allegation at the earliest opportunity.
- 3.3 In the case of allegations against the Principal and Chief Executive Officer (CEO), the report should be made to the Chair of Governors.
- 3.4 Due regard must be given to the statutory guidance Working Together to Safeguard Children 2023 when dealing with any allegations against staff. The following procedures take account of that guidance accordingly.

4. Receiving an allegation from a member of staff

- 4.1 Where a member of staff has a concern about other another member of staff, the concern should be referred to the Vice Principal Curriculum Innovation, Quality and Performance Where the concern relates to the Principal and Chief Executive Officer (CEO), the Chair of Governors should be informed.
- 4.2 In the first instance, the Vice Principal Curriculum Innovation, Quality and Performance will immediately discuss the allegation with the Local Authority's Designated Lead. The purpose of the initial discussion will be for the Designated Safeguarding Lead and the Vice Principal Curriculum Innovation, Quality and Performance to consider the nature, content and context of the allegation, and agree a course of action. The Designated Lead

may also be asked to provide or obtain relevant additional information, such as previous history, whether the young person/vulnerable adult or their family have made similar allegations previously, and the individual's current contact with young people/vulnerable adults.

- 4.3 There may be situations when the Designated Safeguarding Lead will want to involve the police immediately, for example, if the person is deemed to be an immediate risk to young people/vulnerable adults, or there is evidence of a possible criminal offence. Where there is no such evidence, the allegations will be discussed in order to help determine whether police involvement is necessary.
- 4.4 The initial sharing of information and evaluation may lead to a decision that no further action is to be taken in regard to the individual facing the allegation or concern. In such circumstances this decision and a justification for it will be recorded by both the Safeguarding Officer the Designated Lead, and agreement reached on what information should be put in writing to the individual concerned and by whom. The Designated Lead what action should follow both in respect of the individual and the person who made the initial allegation.
- 4.5 The Vice Principal Curriculum Innovation, Quality and Performance will inform the member of staff about the allegation as soon as possible after consulting the Designated Safeguarding Lead. Wherever possible, Designated Lead will provide him/her with as much information as possible at that time; however, where a strategy discussion is needed, or the police or Social Care need to be involved, this will not be possible until those agencies have been consulted, and have agreed what information can be disclosed to the accused.
- 4.6 The Vice Principal Curriculum Innovation, Quality and Performance will provide the employee with a named contact who will keep the employee informed of progress of the case and consider what other support may be available to the individual.
- 4.7 If there is cause to suspect a young person/vulnerable adult is suffering, or is likely to suffer significant harm, a strategy discussion will be convened in accordance with the statutory guidance contained within the 'Working Together to Safeguard Children' document. Where the strategy discussion or initial evaluation decides that it is clear that an investigation by the police or Social Care is unnecessary, the Vice Principal Curriculum Innovation, Quality and Performance will discuss the next steps. In those circumstances, the options open to the College will depend on the nature and circumstances of the allegation and the evidence and information available. This will range from taking no further action, dismissal after proceeding to the College's disciplinary procedure, the provision of relevant training, or, where the individual concerned is not an employee of the College, taking the decision not to use the person's services in the future.
- 4.8 If further enquiries are needed to enable a decision to be made an investigation will be undertaken. It is likely that in straightforward cases, any investigation would normally be undertaken in line with the college's own Disciplinary Policy.

5. Suspension

- 5.1 The Vice Principal Curriculum Innovation, Quality and Performance must give careful consideration to whether the circumstances of the case warrant the member of staff being suspended from contact with young people/vulnerable adults, or whether alternative arrangements can be put in place until the allegation or concern is resolved. Suspension will not be an automatic response when an allegation is reported; all options to avoid suspension will be considered prior to taking that step. Suspension should be considered only in cases where there is cause to suspect a young person/vulnerable adult, or other young people/vulnerable adults at College, is/are at risk of harm, or the case is so serious that it might be grounds for dismissal.

- 5.2 If immediate suspension is considered necessary, the rationale and justification for such a course of action will be agreed and recorded by the Vice Principal Curriculum Innovation, Quality and Performance. This will also include what alternatives to suspension were considered, and why they were rejected.
- 5.3 Where it has been deemed appropriate to suspend the individual, written confirmation of this decision will be issued within one working day, and will give as much detail as appropriate for the reasons for the suspension. The individual will also be informed who their named contact is within the organisation and be provided with their contact details.

6. Confidentiality

- 6.1 It is extremely important that when an allegation is made, every effort is made to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered. Vice Principal Curriculum Innovation, Quality and Performance, Designated Lead, police and Social Care services (if applicable), to agree the most appropriate way in which to manage the situation.
- 6.2 Parents/carers of the young person/vulnerable adult (without mental capacity) involved in the safeguarding issue, will be told about the allegation as soon as possible, if they do not already know of it. However, where a strategy discussion is required, or police or Social Care services need to be involved, the Designated Lead should not do so until those agencies have been consulted and have agreed what information can be disclosed to the parents/carers.
- 6.3 Parents/carers will also be kept informed about the progress of the case, and told the outcome where there is not a criminal prosecution, including the outcome of any disciplinary process. Although the deliberations of a disciplinary hearing, and the information taken into account in reaching a decision, cannot normally be disclosed, the parents/carers will be told the outcome in confidence.
- 6.4 Parents/carers should also be made aware of the requirement to maintain confidentiality about any allegations made against individuals while investigations are on-going.

7. Disciplinary Action

- 7.1 The college shall hold in abeyance its own internal enquiries while any formal police or Social Care investigations proceed; to do otherwise may prejudice the investigation.
- 7.2 At the point at which criminal/Social Care proceedings have been completed, or where, after consideration of the allegation such proceedings are not deemed necessary, the college will instigate disciplinary proceedings where appropriate. If there are on-going safeguarding concerns whilst managing the allegation through the College's internal processes, the will discuss these with the Principal and Chief Executive Officer (CEO) and Senior Designated Safeguarding Lead.
- 7.3 Where the College does proceed to disciplinary action as a result of a safeguarding concern, the statutory guidance Working Together to Safeguard Children 2019 will be followed in respect of timescales and inter-agency sharing of information where appropriate, and will take precedent over the college's internal disciplinary processes.
- 7.4 Where the police have been involved, wherever possible the Designated Lead will ask the police to obtain consent from the individuals involved to share their statements and evidence for use in the college's disciplinary process. This will be done as the police investigation proceeds and will enable the police to share relevant information without delay at the conclusion of their investigation or any court case.

- 7.5 If the accused member of staff resigns, or ceases to provide their services, this will not prevent an allegation being followed up in accordance with the statutory guidance. The college will make every effort to reach a conclusion in all cases of allegations relating to the safety or welfare of young people or vulnerable adults, including any in which the person concerned refuses to co-operate with the process. Wherever possible the accused will be given a full opportunity to answer the allegation and make representations about it. However, the process of recording the allegation and any supporting evidence, and reaching a judgement about whether it can be substantiated on the basis of all the information available, will continue even if that cannot be done, or the accused does not co-operate. Whilst it may be difficult to reach a conclusion in those circumstances, and it may not be possible to apply any disciplinary sanctions if a person's period of notice expires before the process is complete, it is nevertheless important to reach and record a conclusion.

8. Timescales

- 8.1 It is in everyone's interest to resolve cases as quickly as possible, consistent with a fair and thorough investigation. The statutory guidance Keeping Children Safe in Education (September 2023) outlines clear expectations in relation to timescales for the resolution of cases of allegations against staff, which will take precedence over any timescales outlined in the college's internal disciplinary procedure.

9. Specific Actions

- 9.1 Following a criminal investigation or a prosecution, the police will inform the Principal and Chief Executive Officer (CEO) and the Senior Designated Lead immediately when a criminal investigation and any subsequent trial is complete, or if it is decided to close an investigation without charge, or not to continue to prosecute the case after person has been charged.
- 9.2 In those circumstances, the Principal and Chief Executive Officer (CEO) will discuss with the Senior Designated Safeguarding Lead whether any further action, including disciplinary action, is appropriate and, if so, how to proceed. The information provided by the police and/or Social Care services should inform that decision. The options will depend on the circumstances of the case and consideration will need to take into account the result of the police investigation or the trial, as well as the different standard of proof required in disciplinary and criminal proceedings.

10. On conclusion of a case

- 10.1 If the allegation is substantiated and the individual is dismissed following a disciplinary hearing, or the college ceases to use the individual's services, or the individual resigns or otherwise ceases to provide his/her services, the Vice Principal Curriculum Innovation, Quality and Performance will discuss with the Senior Designated Safeguarding Lead whether the College needs to make a referral to the Disclosure and Barring Service (DBS), for consideration of whether inclusion on the barred lists is required.
- 10.2 If an allegation is shown to be deliberately invented or malicious, the Vice Principal Curriculum Innovation, Quality and Performance should consider whether any disciplinary action is appropriate against the individual who made it, or whether the police should be asked to consider if action might be appropriate against the person responsible.

11. Effectiveness and Monitoring

- 11.1 At the conclusion of a case in which an allegation is substantiated, the Vice Principal Curriculum Innovation, Quality and Performance will review the circumstances of the case with the Senior Designated Safeguarding Lead and other colleagues as appropriate to determine whether there are any improvements to be made to the College's procedures

or practice to help prevent similar events in the future, including staff training. This should include issues arising from the decision to suspend the member of staff if applicable, the duration of the suspension and whether or not suspension was justified. The Vice Principal Curriculum Innovation, Quality and Performance and Senior Designated Lead should also consider how future investigations of a similar nature could be carried out without suspending the individual.

12. Record Keeping

- 12.1 Details of allegations that are found to have been malicious will not be kept on an individual's personnel file. However, for all other allegations, a clear and comprehensive summary of the allegation, details of how the allegation was followed up and resolved, and a note of any action taken and decisions reached, will be kept on the personnel file of the staff member concerned, and a copy provided to the person concerned.
- 12.2 The college keeps all safeguarding files electronically using a system called CPOMS
- 12.2 The purpose of the record is to enable accurate information to be given in response to any future request for a reference, where appropriate. It will also provide clarification in cases where future DBS checks reveal information from the police about an allegation that did not result in a criminal conviction and will help to prevent unnecessary re-investigation if an allegation re-surfaces after a period of time.
- 12.3 The record should be retained at least until the member of staff concerned has reached normal pension age or for a period of 10 years from the date of the allegation if that is longer.
- 12.5 All data processed by the college is carried out in line with the General Data Protection Guidelines and the Data Protection Act (2018)
- 12.6 Further information regarding information sharing and data processing in relation to Safeguarding can be found in Part Two of Keeping Children Safe in Education (September 2023).

SAFEGUARDING PROCEDURES AND GUIDANCE FOR STAFF – HOW TO PROTECT YOURSELF FROM FALSE ALLEGATIONS OF ABUSE

Staff Should:

- Always adopt safe working practices with young people and vulnerable adults.
- Always seek permission and explain any physical contact such as administering first aid or comforting a distressed learner.
- Always inform and demonstrate to parents/carers of learners with special needs what physical contact may be necessary whilst being cared for.
- Be sensitive to heritage, culture and faiths.

Staff should not:

- Kiss or cuddle a learner
- Tickle or engage in other games involving physical contact.
- Touch the learner unless there is a justifiable reason.
- Do not do anything of a personal nature for the learner that they can do for themselves.
- Encourage “favourites”. All learners should be treated equally.
- Give a learner a lift alone in a car.
- Give out your personal mobile phone number to learners
- Connect with learners via any form of personal social networking sites.

What if a learner pushes the boundaries in terms of touch?

Staff should:

- Gently but firmly disengage themselves.
- Create distance between themselves and the learner
- Explain it is inappropriate to be so close.
- Not humiliate the learner
- Report it to the Designated Safeguarding Lead

SAFEGUARDING PROCEDURES AND GUIDANCE FOR STAFF – GUIDANCE NOTES ON STAFF- LEARNER RELATIONSHIPS

1. This guidance is not exhaustive and is designed to set out principles rather than to give detailed and specific advice. This guidance applies to all adults (including volunteers) working in the college who may interact with learners during the course of their duties.
2. The relationship between staff and learners is a professional one. It is fully expected - and indeed, hoped – that staff in the college have a friendly and caring approach to learners. Nevertheless, the basis of that relationship is professional not personal.
3. A personal relationship between a member of staff and a learner is inappropriate unless it is with the full knowledge and consent of the learner's parents/carers. Such circumstances may be where there is a personal relationship between the member of staff and the learner's parents. It is not normally appropriate for a member of staff to meet with a learner outside college except with the prior consent of parents and the college.
4. Unnecessary physical contact with learners must be avoided. If there is a need for physical contact e.g. where some restraint is required to avoid the learner endangering themselves or others, staff should be very sensitive to the likely reaction of the learner and to watch out for signs that the learner is uncomfortable or apprehensive.
5. Over familiar words and actions, displays of affection, discussion of one's personal life or the personal life of the learner are always inappropriate. Sexual innuendo is wrong in all circumstances. Staff must avoid words, actions or expressions that could be interpreted as suggesting that they have an emotional relationship with any learner. In the professional staff/learner relationship it is not appropriate to single out a learner for favours or to suggest to a learner that he/she is a special friend.
6. Occasionally it is necessary for professional academic reasons for staff to communicate with learners out of College. Personal email addresses, home or mobile phone numbers must not be given, asked for or used. Pastoral matters should not normally be dealt with by personal email or using personal phone contacts. Only in extreme cases, for instance where there is concern for the whereabouts of a learner should personal contact information be used. If any contact is made using personal contact details it should be recorded on the learner record. It is very difficult to envisage circumstances under which individual texting is appropriate except through official College channels.
7. Members of staff who in the course of their professional duties need to work on a one to one basis with a learner must be mindful and aware of the safeguarding implications. In particular, where the learner is of the opposite sex it is important to ensure that the meeting is entirely professional and that a room with a vision panel in the door is used.
8. Staff must avoid threatening words, raised voices, and any aggressive contact such as holding, pushing, pulling which could amount to or be interpreted as a criminal assault. If there is an incident that requires intervention, then warden assistance should be summoned.
9. Social networking sites such as Facebook, Twitter and other social media, pose risks for all staff in terms of professional integrity and the welfare of learners. Staff must not use these sites to contact or communicate with learners or learners who have recently left. Should you become aware of material about yourself, the College or a learner which is inappropriate, the Designated Senior Manager must be informed and they will check the allegations and determine any course of action. You must not check it out yourself. Further details are contained within the College Social Media Policy.
10. If staff are concerned about anything which has occurred or which has made them uncomfortable, they should discuss the matter with the Designated Senior Lead or Deputy at the earliest opportunity even if it turns out that nothing untoward has happened. Staff must make a written record, dated and signed of the issue that concerns them.

PREVENTING VIOLENT EXTREMISM AND RADICALISATION

All educational establishments have a responsibility to promote values of openness and respect and to facilitate free debate which is characteristic of being a British citizen. Section 21 of the *Counter Terrorism and Security Act 2015* places a duty on certain bodies to have “due regard to the need to prevent people from being drawn into terrorism”.

1. The Government’s Prevent Strategy was published in 2011 and forms part of an overall Counter Terrorism Strategy known as CONTEST. The Contest Strategy has four elements which are detailed below:
 - Pursue
 - Protect
 - Prepare
 - Prevent
2. Prevent is a key part of the Contest Strategy which aims to stop people from becoming terrorists or supporting terrorism. Early intervention is at the heart of Prevent in diverting people away from being drawn into terrorist activity as Prevent happens before any criminal activity takes place.
3. **Radicalisation** is defined as the process by which people come to support terrorism and extremism and, in some cases, then participate in terrorist groups.
4. Extremism is vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs.
5. To ensure that the College effectively manages risks and is able to deal appropriately with issues around radicalisation and extremism the College will:
 - Understand the nature of the threat from extremism and how this may impact directly or indirectly on the College.
 - Understand and manage potential risks within the College and from external influences including the display of extremist materials and the hiring of College premises.
 - Respond rapidly and appropriately to events in local, national or international news that may impact on the College community.
 - Ensure measures are in place to minimise the potential for acts of extremism within the College.
 - Ensure plans are in place to respond appropriately to a threat or incident within the College.
 - Adopt effective ICT security and responsible user policies and promote these to all staff and learners.
6. Where there is an identified/potential risk that a learner may be involved in supporting or following extremism, further investigation by the police will be requested, prior to other assessments and interventions. The Designated Lead for Safeguarding is responsible for contacting either the West Midlands Police or the BIS Prevent Coordinator for further advice and guidance.

Any member of staff who identifies such concerns will report these to a member of the College Safeguarding Team or the Designated Lead for Safeguarding. The relevant and factual information must also be documented on CPOMS portal and the Designated Safeguarding Lead alerted at the earliest opportunity.
7. Examples in relation to extremism are expected to be very rare but emergency procedures will be adopted when there is information that a violent act is imminent, or where weapons or other materials may be in the possession of a learner or a community member. In this situation, a 999

call will be made and the College's Senior Management team informed as soon as practicably possible.

8. Where a child or vulnerable adult is thought to be in need or at risk of significant harm or where investigations need to be carried out a referral to the Social Services will be made in line with the College Safeguarding procedures following advice from the Coventry Prevent Coordinator.
9. The Channel Process
 - 10.1 Referrals to the Channel process are often likely to be made in the first instance by individuals who come into contact with vulnerable people. At College, the referral will most likely be made by the Designated Safeguarding Lead or one of the safeguarding deputies.
 - 10.2 Further information on how the College meets its statutory duty with regards to Prevent can be found in the Prevent Strategy and Action Plan.

1. Further Information

- 1.1 Both CSE and CCE Child are forms of abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. CSE and CCE can affect children/young people, both male and female and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation.
- 1.2 **Child sexual exploitation** does not always involve physical contact: it can also occur through the use of technology. Like all forms of child sex abuse, child sexual exploitation:
- can affect any child or young person (male or female) under the age of 18 years, including 16- and 17-year olds who can legally consent to have sex;
 - can still be abuse even if the sexual activity appears consensual;
 - can include both contact (penetrative and non-penetrative acts) and noncontact sexual activity;
 - can take place in person or via technology, or a combination of both;
 - can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence;
 - may occur without the child or young person's immediate knowledge (e.g. through others copying videos or images they have created and posted on social media);
 - can be perpetrated by individuals or groups, males or females, and children or adults. The abuse can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse;
 - is typified by some form of power imbalance in favour of those perpetrating the abuse. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources.
- 1.3 Some of the following signs may be indicators of child sexual exploitation:
- children who appear with unexplained gifts or new possessions;
 - children who associate with other young people involved in exploitation;
 - children who have older boyfriends or girlfriends;
 - children who suffer from sexually transmitted infections or become pregnant;
 - children who suffer from changes in emotional well-being;
 - children who misuse drugs and alcohol;
 - children who go missing for periods of time or regularly come home late; and
 - children who regularly miss college or education or do not take part in education
- 1.4 **Child Criminal Exploitation (CCE)** Some specific forms of CCE can include children/young people being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting, or pickpocketing.
- They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others.
 - can become trapped by this type of exploitation, as perpetrators can threaten victims (and their families) with violence or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others. As children involved in criminal exploitation often commit crimes themselves, their vulnerability as victims is not always recognised by adults and professionals, (particularly older children), and they are not treated as

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

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

Refer to KCSiE (Sept 2023) Annex B for further information and County Lines Toolkit for Professionals

Extra-Familial Harm

- The college recognises that safeguarding incidents can be associated with factors outside the college and may take place outside of college. We also recognise that safeguarding incidents or behaviours can occur between children outside of college. We will always consider contextual safeguarding factors when responding to safeguarding incidents.
- All staff will be made aware that safeguarding incidents and/or behaviours can be associated with factors outside the college and/or can occur between children outside these environments.

2. Female Genital Mutilation (FGM) (A form of so-called 'honour-based' abuse)

- 2.1 Female Genital Mutilation (FGM): professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a girl being at risk of FGM, or already having suffered FGM. There are a range of potential indicators that a learner or young person may be at risk of FGM, which individually may not indicate risk, but if there are two or more indicators present this could signal a risk to the learner or young person. Victims of FGM are likely to come from a community that is known to practise FGM. Professionals should note that girls at risk of FGM may not yet be aware of the practice or that it may be conducted on them, so sensitivity should always be shown when approaching the subject. Warning signs that FGM may be about to take place, or may have already taken place, can be found on pages 11-12 of the Multi-Agency Practice Guidelines referred to previously. Staff should activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and children's social care.
- 2.2 This document is available to download at: www.gov.uk/government/publications. Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015), will place a statutory duty upon teachers, along with social workers and healthcare professionals, to report to the police where they discover (either through disclosure by the victim or visual evidence), that FGM appears to have been carried out on a girl under 18. Those failing to report such cases will face disciplinary sanctions.

3. So-called 'Honour Based' Abuse

- 3.2 So-called 'honour-based' abuse encompasses crimes which have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation (FGM), forced marriage, and practices such as breast ironing. All forms of so-called HBV are abuse (regardless of the motivation) and should be handled and escalated as such. If in any doubt, staff should speak to the designated safeguarding lead. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of Honour Based Abuse, or already having suffered Honour Based Abuse.

4. Forced Marriage

- 4.1 Forcing a person into a marriage is a crime in England and Wales. The law was changed in February 2023 and it is now a crime to carry out any conduct whose purpose it is to cause a child to marry before their 18th birthday, even if violence, threats and coercion are not used. This applies to non-binding unofficial “marriages”.

A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats, or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some communities use religion and culture as a way to coerce a person into marriage. Colleges and colleges can play an important role in safeguarding children from forced marriage.

5. Youth Produced Sexual Imagery (‘sexting’)

- 5.1 “Sexting” refers to any sharing of youth-produced sexual imagery between children.

This includes:

- A person under the age of 18 creating and sharing sexual imagery of themselves with a peer under the age of 18;
 - A person under the age of 18 sharing sexual imagery created by another person under the age of 18 with a peer under the age of 18 or an adult;
 - person under the age of 18 being in possession of sexual imagery created by another person under the age of 18.
- 5.2 These images are shared between young people via a mobile phone, a handheld device or website with people they may not even know. Young people often do not anticipate the implications and consequences of sharing things online as they would offline; however, the consequences of sexting can be devastating. Once the image is in the public domain, it is difficult to control, to know who has seen it and what they have done with it. The social and psychological effects on individuals can be significant; in extreme cases it can result in suicide or a criminal record, isolation and vulnerability. Because of the prevalence of sexting, young people are not always aware that, in the context of the law, sexting is illegal.
- 5.3 As with all safeguarding issues and concerns, it is vitally important for all staff to be vigilant, noticing any concerns about young people sending, receiving and/or disseminating indecent images of themselves and other young people.
- 5.4 If staff notice any concerns, they must report them to the Designated Safeguarding Lead (DSL) or one of the safeguarding deputies, as with any other safeguarding concern. Staff should not make their own judgements about whether a 'sexting' issue is more or less serious enough to warrant a report to the DSL. What may seem like less serious concerns to individual members of staff, may be more significant when considered in the light of other information known to the DSL or safeguarding deputies, of which the member of staff may not be aware.
- 5.5 Any incidents of Sharing nudes and semi-nudes (previously known as ‘sexting’ involving the following will result in a MASH and/or Police referral
- Adult involvement;
 - Coercion or blackmail;
 - Children under the age of 13;
 - Extreme, or violent content;

- Immediate risk of harm.
- In cases where nudes or semi-nudes have been shared, we follow guidance given to colleges and colleges by the UK Council for Internet Safety (UKCIS): Sharing nudes and semi-nudes (December 2020)

Staff will not view images or videos on learners' devices. Confiscated devices will be stored securely and passed to the relevant agencies. We will work with parents as necessary if their child is involved in 'sexting'. We operate a culture of safeguarding and young people should feel confident to disclose if they have sent an inappropriate image of themselves. Children will always be supported to retrieve and delete the images.

6. Serious Violence

All staff will be made aware of indicators, which may signal that children are at risk of, or are involved with serious violent crime.

All staff will be made aware of the risks associated with serious violence, criminal networks and gangs and understand the measures in place to prevent these.

All staff will have an awareness of Child Criminal Exploitation (CCE) and behaviours linked to Child Criminal Exploitation. Further information about Child Criminal Exploitation can be found in Keeping Children Safe in Education (2023) Part 5

CCE occurs where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial or other advantage of the perpetrator or facilitator and/or (c) through violence or the threat of violence.

CCE occurs where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial or other advantage of the perpetrator or facilitator and/or (c) through violence or the threat of violence.

The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact; it can also occur through the use of technology.

Some of the following can be indicators of CCE:

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

7. Children Missing in Education

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

8. Early Help

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

For further information about the Coventry Safeguarding Children Partnership's 'Right Help, Right Time' guidance, which is used by the college to make decisions about protecting children, please visit <http://www.coventry.gov.uk/righthelprighttime>.

9. Peer on Peer Abuse (Also known as Child on Child - KCSiE 2023)

- 9.1 The college understands that both adults and other children can perpetrate abuse, and peer on peer abuse is taken very seriously. Peer on peer abuse can include bullying, cyber-bullying, physical abuse, sexting, sexual violence and/or harassment, up skirting, and initiation/hazing ceremonies. The college recognise that safeguarding issues can manifest as peer on peer abuse. The College will adhere to guidance set out in Keeping Children Safe in Education (2023) when responding to incidents of peer on peer abuse. All staff should understand that even if there are no reports in the college it does not mean it is not happening, it may be the case that it is just not being reported. As such it is important if staff have any concerns regarding Peer on Peer abuse they should speak to their designated safeguarding lead (or deputy).

Peer on Peer abuse is most likely to include, but may not be limited to:

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

10. Sexual Violence & Sexual Harassment

Sexual violence and sexual harassment can occur between two children of any age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment.

KCSIE Sept 2023 provides new information, emphasising:

- the importance of explaining to children that the law is in place to protect rather than criminalise them
- the importance of understanding intra-familial harms, and any necessary support for siblings following incidents
- the need for college to be part of discussions with statutory safeguarding partners.

Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and offline (both physical and verbal) and are never acceptable. It is important that all victims are taken seriously and offered appropriate support. Staff should be aware that some groups are potentially more at risk.

Evidence shows girls, children with SEND and LGBT children are at greater risk. Staff should be aware of the importance of:

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

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

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

10.2 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.

- 10.3 When referring to sexual harassment we mean 'unwanted conduct of a sexual nature' that can occur online and offline. When we reference sexual harassment, we do so in the context of Peer on Peer (- child on child) sexual harassment. Sexual harassment is likely to: violate a child's dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment. Whilst not intended to be an exhaustive list, sexual harassment can include:
- sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names;
 - sexual "jokes" or taunting;
 - physical behaviour, such as: deliberately brushing against someone, interfering with someone's clothes (colleges and colleges should be considering when any of this crosses a line into sexual violence - it is important to talk to and consider the experience of the victim) and displaying pictures, photos or drawings of a sexual nature; and
 - online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence. It may include: non-consensual sharing of sexual images and videos; sexualised online bullying; unwanted sexual comments and messages, including, on social media; and • sexual exploitation; coercion and threats
- 10.4 Reports of sexual violence and sexual harassment are likely to be complex and require difficult professional decisions to be made, often quickly and under pressure. Preplanning, effective training and effective policies will provide the college with the foundation for a calm, considered and appropriate response to any reports.
- 10.5 It is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.
- 10.6 Effective safeguarding practice includes not promising confidentiality at this initial stage as it is very likely a concern will have to be shared further (for example, with the designated safeguarding lead or children's social care) to discuss next steps. Staff should only share the report with those people who are necessary in order to progress it. It is important that the victim understands what the next steps will be and who the report will be passed to.
- 10.7 Recognising a child is likely to disclose to someone they trust and this could be anyone on the college staff. It is important that the person to whom the child discloses recognises that the child has placed them in a position of trust. They should be supportive and respectful of the child; listening carefully to the child, being non-judgmental, being clear about boundaries and how the report will be progressed, not asking leading questions and only prompting the child where necessary with open questions – where, when, what, etc.;
- 10.8 Considering the best way to make a record of the report. Best practice is to wait until the end of the report and immediately write up a thorough summary. This allows the staff member to devote their full attention to the child and to listen to what they are saying. It may be appropriate to make notes during the report (especially if a second member of staff is present). However, if making notes, staff should be conscious of the need to remain engaged with the child and not appear distracted by the note taking. Either way, it is essential a written record is made; only recording the facts as the child presents them. The notes should not reflect the personal opinion of the note taker.

The College should be aware that notes of such reports could become part of a statutory assessment by children's social care and/or part of a criminal investigation;

- 10.9 Where the report includes an online element, being aware of searching screening and confiscation advice (for colleges) and UK Council for Child Internet Safety (UKCIS) sexting advice (for colleges and colleges). The key consideration is for staff not to view or forward illegal images of a child.

STOP AND SEARCH - LEARNERS

Please refer to the *Stop and Search Learner Procedures 2019/2020*

The *Education Act 1996* gives the Principal and Deputy Chief Executive Officer and staff authorised by the Principal and Deputy Chief Executive Officer the power to search learners for any Prohibited items where there are reasonable grounds for suspicion that a learner is in possession of such an item.

1. Definitions

- 1.1 An offensive weapon is anything made, adapted or intended for use as a weapon. There is no situation in which the possession of such articles will be considered safe and acceptable, unless they are being used in the course of a supervised lesson or by other authorised personnel during the course of their work.
- 1.2 Prohibited items identified by the College are:
 - Knives or weapons
 - Illegal Drugs
 - Alcohol
 - Fireworks
 - Pornographic images
 - Stolen items
 - Nitrous gas
- 1.3 Any article that the member of staff reasonably suspects has been, or is likely to be used to commit an offence or cause personal injury.

THE USE OF REASONABLE FORCE

- 1.1 There are circumstances when it is appropriate for staff in colleges and colleges to use reasonable force to safeguard children and young people. The term 'reasonable force' covers the broad range of actions used by staff that involve a degree of physical contact to control or restrain children. This can range from guiding a child to safety by the arm, to more extreme circumstances such as breaking up a fight or where a young person needs to be restrained to prevent violence or injury. 'Reasonable' in these circumstances means 'using no more force than is needed'. The use of force may involve either passive physical contact, such as standing between learners or blocking a learner's path, or active physical contact such as leading a learner by the arm out of the classroom.
- 1.2 When using reasonable force in response to risks presented by incidents involving children with SEN or disabilities or with medical conditions, colleges and colleges should in considering the risks carefully recognise the additional vulnerability of these groups. They should also consider their duties under the Equality Act 2010 in relation to making reasonable adjustments, non-discrimination and their Public Sector Equality Duty. By planning positive and proactive behaviour support, for instance through drawing up individual behaviour plans for more vulnerable children, and agreeing them with parents and carers, colleges and colleges can reduce the occurrence of challenging behaviour and the need to use reasonable force.
- 1.3 It should be ensured that restrictive physical interventions at Coventry College are used as infrequently as possible, that they are only used in the best interests of the learner, and, where it has been essential to apply, that everything possible is done to prevent injury and maintain a sense of dignity.
- 1.4 If a learner is behaving in a way that might be deemed appropriate for intervention, the following procedure should be adopted (assessing what may be deemed as appropriate for intervention is down to the discretion and professional opinion of the member of staff involved).
 - Use strategies and techniques to defuse the situation
 - Send for assistance calling Security who will also alert the Duty Manager and Head of Estates and Facilities
 - Continue to attempt to defuse the situation and try to prevent the situation from escalating
 - Instruct the learner(s) who are misbehaving to stop and explain the consequences of failing to comply
 - Take a calm, measured approach so that you do not give the impression that you have lost your temper, are acting out of frustration or intending to punish the learner
 - Use of reasonable force must only be used as a last resort and only if all other avenues have been attempted or are inappropriate i.e. immediate risk of harm if action not taken
 - Continue talking throughout the incident making it clear that physical contact/restraint will stop as soon as the learner complies with the instructions
 - Immediately following any use of physical restraint, the Designated Safeguarding Lead needs to be informed who will in turn contact the Principal.

STORAGE OF MEDICATION

It is important that the college provides an environment that supports all learners, to be able to attend college and achieve. This is an important aspect of the government's drive to be inclusive.

1. Key Principles

- 1.1 On no account will staff administer any medication.
- 1.2 The college strives to ensure that appropriate staff are aware of serious medical conditions affecting a learner in the college. Members of the Additional Learning Support team will update ProMonitor with appropriate information, and will ensure that risk assessments have been completed and are available to the first aid team at the appropriate campus.
- 1.3 Coventry College will not purchase or store any medication other than which has been supplied by learners/parents, and which is in accordance with the guidance outlined by this procedure.
- 1.4 All medicines deemed suitable will be stored as part of an Education Health Care Plan for each learner.
- 1.5 The responsibility to ensure a learner receives their medication lies with the learner and his/her parents.

2. Is the medication suitable to be stored by the College?

- 2.1 The following medication will be deemed as suitable medication:
 - Any prescribed medication for potentially life-threatening conditions such as asthma, epilepsy, anaphylaxis and diabetes. There will be other similar conditions that fall into this category.
 - Any medication that has been prescribed by a Doctor for a temporary illness.
 - Any medication that has been prescribed by a Doctor for an injury or other long-term condition.
 - Unsuitable medication:
 - Any medication that has **NOT** been prescribed by a Doctor.
 - Any 'across the counter' painkillers or other medications that have not been prescribed.

3 What should learners/parents do? Regular (Long Term) Medication

- 3.1 Learners/parents must ensure that any prescribed medication is contained in its original, properly labelled bottle or box.
- 3.2 Learners/parents will be asked to complete a Medical Form. This will state the date on which any medicine must be removed and/or replaced.
- 3.3 Learners/parents must ensure that medication is kept up to date, and that out of date medication is removed from the college and disposed of safely.
- 3.4 Where the administration of medicine requires the use of a needle, learners/parents should provide a *sharps box*, obtained on prescription from their GP and labelled with the learner's name. This will be kept in a lockable cupboard in the First Aid room of the college.

- 3.5 The college reserves the right to take any medication, not removed within one week of its expiry date, to a pharmacy for safe disposal.

4. Short Term Medication

- 4.1 Medicines such as antibiotics will not normally be held centrally. It is expected the learner will be able to self-administer without the need for storage by the College. Where there is a risk associated to the learner carrying the medication, a risk assessment will be completed.
- 4.2 Any short-term medication prescribed for potentially life-threatening conditions, will fall under the regular (long term) medication instructions.

5. How will medication be stored?

- 5.1 Asthma and anti-anaphylaxis, e.g., EPIPEN medication may be kept with the learner, provided he/she is deemed to be responsible in the way he/she uses and handles the medication.
- 5.2 Any other medication provided, will be stored in the lockable storage cabinet in the First Aid room or the refrigerator in the same location.

6. How will medication be administered?

- 6.1 Learners will take their own medication.
- 6.2 In the case of a learner under the age of 18 refusing to take their medicine, the College will contact the parent/guardian named in the EHCP or on ProMonitor.
- 6.3 Learners will be provided with a private room to take their medication.
- 6.4 Details of any medication taken will be recorded and stored in a folder relevant to each learner. These administration records will be stored with the medication in the First Aid room which is locked overnight. Learner/parents may ask to see these records at any time during college hours.
- 6.5 In the case of an acute and unscheduled need for medication to be taken in an emergency situation, the emergency services will be contacted.

ADDITIONAL ADVICE AND SUPPORT

Can also be found on Keeping Children Safe in Education Part 1

To raise concerns about children, members of staff should contact the Multi-Agency Safeguarding Hub (MASH) by telephone to discuss the referral. They should then complete the online Multi-Agency Referral Form (MARF) and submit this to the MASH. The college will follow up referrals if we do not receive feedback from Children's Services to ascertain the outcome of all referrals.

MASH 02476 788 555 or MASH@coventry.gov.uk

Warwickshire MASH (now incorporated into Children and Families Front Door): 01926 4141440
triagehub@warwickshire.gov.uk

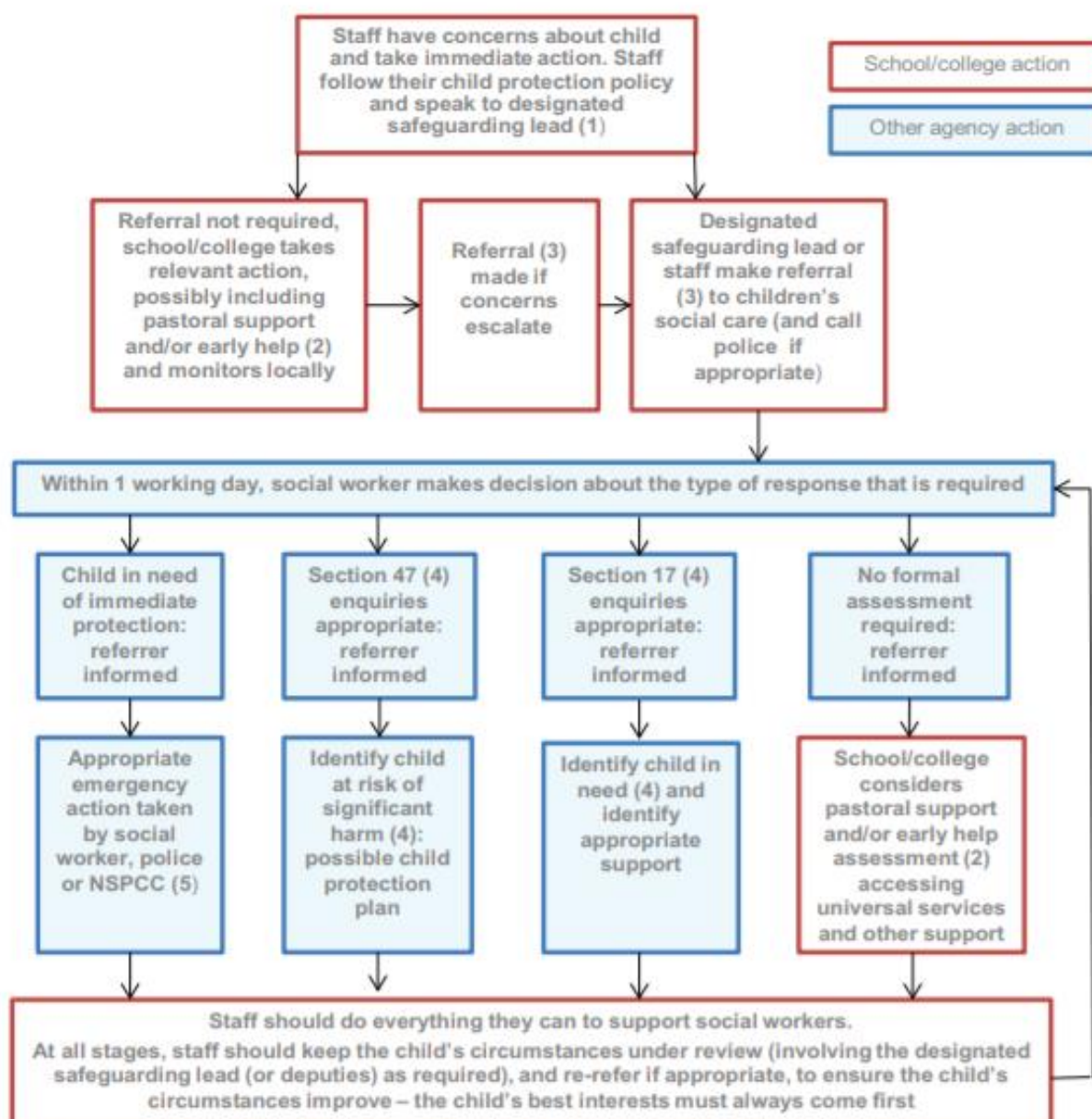
MASH online referral form: <http://www.coventry.gov.uk/safeguardingchildren>

Out of hours Emergency Duty Team: 02476 832 222

Prevent/Channel Referrals: Refer to MASH (mash@coventry.gov.uk) and to CTU_GATEWAY@west-midlands.pnn.police.uk

If a child/young person's situation does not appear to be improving following a referral, the college may re-refer the child. We will also consider using the [Coventry Safeguarding Children Partnership's Managing Professional Disagreements policy](#) to ensure that our concerns have been addressed and that the situation improves for the child.

Actions where there are concerns about a child



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

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

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

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

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

Concerns and actions must be recorded on CPOMS, DSL and/or a member of the safeguarding team alerted and appropriate referrals made.

Peer on Peer Abuse also known as Child on Child- KCSiE 2023
(including bullying, cyber-bullying, sexting, sexual violence, up skirting and sexual harassment)

1. Purpose and content

The purpose of this appendix of the College Safeguarding Policy is to provide a clear set of guidelines to staff regarding the actions they must take if they become aware that a learner is at risk of abuse from peers including through bullying, cyber-bullying and sexting.

2. Definitions

The key terms in this document 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
- **Education and Health Care Plan (EHCP):** From September 2014 EHCPs began to replace Statements of special educational needs and Learning Difficulty Assessments from those under the age of 25. An EHCP outlines information about the person including how they communicate, what support they need and what they would like to achieve
- **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. See Appendix E, online safety.
- **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. See Appendix E, online safety
- **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
- **Up skirting:** Up skirting 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. Since April 2019 Up skirting has been a criminal offence - Under the Voyeurism Act, up skirting offenders can now be arrested, face up to 2 years in prison and have their name placed on the sex offenders

register if caught up skirting. This includes instances where culprits say the images were taken just for a laugh.

- **Sexual Harassment:** Sexual harassment means 'unwanted conduct of a sexual nature' that can occur online and offline. When we reference sexual harassment, we do so in the context of child on child sexual harassment. Sexual harassment is likely to: violate a child's dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment. Whilst not intended to be an exhaustive list, sexual harassment can include;
- Sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names;
- Sexual "jokes" or taunting;
- Physical behaviour, such as: deliberately brushing against someone, interfering with someone's clothes (colleges and colleges should be considering when any of this crosses a line into sexual violence - it is important to talk to and consider the experience of the victim) and displaying pictures, photos or drawings of a sexual nature; and
- Online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence. It may include:
- Non-consensual sharing of sexual images and videos. (UKCCIS sexting advice provides detailed advice for colleges 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 describes 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.

3. External guidance

Peer on peer abuse can take many forms including physical, sexual (e.g. inappropriate touching) and emotional abuse (including bullying). Department for Education (DfE) September 2023: Keeping Children Safe in Education; statutory guidance for colleges 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 replaced previous anti-discrimination laws with a single Act. A key provision was a new public sector Equality Duty, which came into force on 5 April 2011. This 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

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.

4. Actions

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 in induction and that learners are made aware of the importance of adhering to British values, what constitutes abuse (including bullying and cyber-bullying) and how any incidents of abuse will be addressed through the Learner Behaviour and Conduct Policy
- Curriculum leaders/personal 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 the mandatory tutorial programme
- 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 will be managed in line with the Learner Behaviour and Conduct Policy

- Sanctions against perpetrators may include suspension whilst an investigation takes place and permanent exclusion
- 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 the welfare team as appropriate. All concerns must be referred to a Designated Person for safeguarding following the making a referral appendix to the safeguarding policy.
- The Personal Development and Wellbeing team and/or Designated Person will consider referring learners and their parents/carers to other agencies where appropriate. This may include referral for counselling and to the police as although some types of abuse (e.g. bullying) may not be a specific criminal offence in the UK, some types of harassing or threatening behaviour could be a criminal offence (e.g. under the Protection from Harassment Act 1997)
- 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. An agreement must be reached as to what action should be taken subject to compliance with Learner Behaviour and Conduct Policy
- Advice for Safeguarding deputies where sexual violence occurs –

The victim may ask the college not to tell anyone about the sexual violence or sexual harassment. 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. Whilst the age of criminal responsibility is ten, if the alleged perpetrator is under ten, the starting principle of referring to the police remains. The police will take a welfare, rather than a criminal justice approach, in these cases.

5. Useful contacts

- NSPCC Helpline 0808 800 5000
- NSPCC [Harmful Sexual Behaviour](#)
- ChildLine 0800 500 / www.childline.org.uk
- Kidscape www.kidscape.org.uk
- Anti-Bullying Alliance www.antibullyingalliance.org
- Bullying UK www.bullyinguk.org.uk
- [Brook Sexual Behaviours Traffic Light Tool](#)