1. INTRODUCTION

1.1 Coventry College takes all reasonable steps to promote and safeguard the welfare of learners engaged in any activity. The college pays close attention to, and works within the legislative safeguarding requirements documented in ‘Keeping Children Safe in Education’ (September 2019), and the statutory Prevent duty.

1.2 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.

1.3 The college recognises that safeguarding and child protection is an essential part of the duty of care to all learners and all staff has a responsibility to provide a safe environment in which learners can learn and thrive. The college understands that safeguarding, child protection and promoting the welfare of all young people and vulnerable adults is everyone’s responsibility and everyone has a role to play in protecting them. The college recognises it is part of a wider safeguarding system for young people and vulnerable adults and works closely with other agencies to promote their welfare. The college maintains an attitude of ‘it could happen here’ and will consider the wishes of, and at all times, what is in the best interests of each young person and vulnerable adult.

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:

- The Children Act 1989 and 2004
- 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
- Working Together to Safeguard Children June 2018
- Keeping Children Safe in Education – September 2019
- Procedures set out by the Coventry Safeguarding Children Partnership, and Coventry Safeguarding Adults Board

1.5 Safeguarding Definitions

- **Safeguarding** and promoting the welfare of children is defined for the purposes of this guidance as:
  - protecting children from maltreatment;
  - preventing impairment of children’s health or development;
  - ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and
  - taking action to enable all children to have the best outcomes.

- **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.

- **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

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 This policy applies to all learners, staff, governors, temporary staff, host families, agency workers and volunteers

2.4 This policy also applies to any provision delivered by a sub-contractor or partner of the college

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. LIST OF APPENDICES

Appendix 1: Safeguarding 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 1: Safeguarding Responsibilities

1.1 All Staff will:

- 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.
- Read Part 1 of Keeping Children Safe in Education (September 2019), which can be found on the college Moodle, 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 in appendix 2 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.
- Participate in annual safeguarding training.
- Understand the college’s procedure for dealing with peer on peer abuse.

1.2 The Principal/Deputy 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:

- 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.
- 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/Deputy 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 are appropriately qualified Safeguarding Officers 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.
1.4 Safeguarding Officers 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.
- Acknowledge the receipt of all safeguarding referrals and provide feedback to the referee where appropriate.

1.5 Human Resources will:

- Be committed to operating safer recruitment procedures.
- 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.

1.6 The Governing Body will:

- Appoint a member of the College’s Leadership team to the role of Designated Safeguarding Lead.
- 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
- 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.
- 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.

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.

Appendix 2: 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;
• child sexual exploitation;
• emotional abuse;
• neglect;
• bullying, including cyber- or online-bullying;
• child criminal exploitation (including involvement in county lines);
• domestic abuse;
• Upskirting
• fabricated or induced illness;
• faith-based abuse;
• female genital mutilation;
• forced marriage;
• gangs or youth violence;
• gender-based violence;
• hate;
• radicalisation;
• relationship abuse;
• serious violence;
• sexual violence or sexual harassment (including peer on peer abuse);
• sexting;
• So-called ‘honour-based’ violence;
• trafficking and modern slavery

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

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 Child sexual exploitation (CSE)

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.

1.6 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 15 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. Online safety

1.1 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. Further information regarding online safety can be found in the E-Safety Policy.
2. Confidentiality

2.1 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.

3. Safer recruitment of staff

3.1 The college will comply with the guidance set out in Part 3 of Keeping Children Safe in Education. 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. At least one member of every appointment panel will have gained accreditation through Safer Recruitment training.

4 Staff development

4.1 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.

4.2 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.

4.3 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.

5. What should staff do if they have concerns about safeguarding practices within the College

5.1 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.

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

Appendix 3: 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 Officer/Designated Senior 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 Officer/Designated 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 Officer/Designated Senior 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

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.

Appendix 4: Allegations of abuse against members of staff

1. These procedures should be used in all cases in which it is alleged that a member of staff 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.

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.

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 the Assistant Principal, People Services, 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 Deputy Chief Executive Officer (CEO)

3.2 In the event of the Principal and Deputy Chief Executive Officer (CEO) being unavailable, the allegation will be reported to the Designated Safeguarding Lead, the Assistant Principal, People Services will be subsequently notified of the allegation at the earliest opportunity.

3.3 In the case of allegations against the CEO or Principal/deputy CEO, the report should be made to the Chair of the Corporation.

3.4 Due regard must be given to the statutory guidance Working Together to Safeguard Children 2019 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 another another member of staff, the concern should be referred to the Assistant Principal, People Services Where the concern relates to the CEO or Principal and Deputy Chief Executive Officer, the Chair of Governors should be informed.

4.2 In the first instance, the Assistant Principal, People Services 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 Assistant Principal, People Services 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 Assistant Principal, People Services 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 Assistant Principal, People Services 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 Assistant Principal, People Services 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 Assistant Principal, People Services 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 Assistant Principal, People Services. 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. The Assistant Principal, People Services, 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 CEO and Principal/Deputy CEO and the Designated 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 2019) 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 CEO/Principal and Deputy CEO and 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 CEO and Principal/Deputy CEO will discuss with the Designated 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 Assistant Principal, People Services will discuss with the 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 Assistant Principal, People Services 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 Assistant Principal, People Services will review the circumstances of the case with the Senior Designated 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 Assistant Principal, People Services 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 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.

Appendix 5:

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

Appendix 6: Safeguarding Procedures and Guidance for Staff - Guidance notes on Staff-Learner Relationships

6.1 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.

6.2 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.

6.3 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.
6.4 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.

6.5 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.

6.6 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.

6.7 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.

6.8 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.

6.9 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.

6.10 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.

Appendix 7: 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”.

1.1 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
1.2 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. It is about recognising, supporting and protecting individuals who might be susceptible to radicalisation.

1.3 **Radicalisation** is defined as the process by which people come to support terrorism and extremism and, in some cases, then participate in terrorist groups.

1.4 **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.

1.5 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.

1.6 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.

1.7 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. This is done via the Safeguarding Referral Form (F1) and/or Moodle and relevant information will be documented.

1.8 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.

1.9 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.

1.10 The Channel Process

1.10.1 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.
Appendix 8: Further Information

1. Child Sexual Exploitation

1.1 Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual.

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 school or education or do not take part in education

2. Female Genital Mutilation (FGM)

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 Violence

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

4. Forced Marriage

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

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;
- A 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.

6.  **Children Missing in Education**

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

7.  **Early Help**

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

- is disabled and have specific additional needs;
- has special educational needs (whether or not they have a statutory education, health and care plan);
- is a young carer;
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups;
- is frequently missing/goes missing from care or from home;
- is misusing drugs or alcohol themselves;
- is at risk of modern slavery, trafficking or exploitation;
- is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health problems or domestic abuse;
- has returned home to their family from care;
- is showing early signs of abuse and/or neglect;
- is at risk of being radicalised or exploited;
- is a privately fostered child

7.2 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.

8.  **Peer on Peer Abuse**

8.1 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 (2019)) when responding to incidents of peer on peer abuse

- All staff will be made aware that ‘up skirting’ is a criminal offence.
- All members of staff will be made aware of the college’s policy and procedures with regards to peer on peer abuse. The college will ensure staff understand what is meant by peer on peer abuse and the college policy on peer on peer abuse by
- In the event that an allegation of peer on peer abuse is made, the college will investigate and record outcome.
- In the event that an allegation of peer on peer abuse is made, victims and alleged perpetrators will be supported, through mentoring or external agency support
- The college will never pass off peer on peer abuse as ‘banter’ or ‘part of growing up’.

9. Sexual Violence & Sexual Harassment

9.1 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.

9.2 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.

9.3 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.

9.4 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.
9.5 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.

9.6 When referring to sexual harassment we mean 'unwanted conduct of a sexual nature' that can occur online and offline. When we reference sexual harassment, we do so in the context of child on child sexual harassment. Sexual harassment is likely to: violate a child's dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment. Whilst not intended to be an exhaustive list, sexual harassment can include:

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

9.7 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.

9.8 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.

9.9 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.

9.10 Recognising a child is likely to disclose to someone they trust and this could be anyone on the school or 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.;

9.11 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. Schools and colleges 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;

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

10. Children with Special Educational Needs or Disabilities

10.1 Children with special educational needs (SEN) and disabilities can face additional safeguarding challenges. 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. These can include:
- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child’s disability without further exploration;
- being more prone to peer group isolation than other children;
- the potential for children with SEN and disabilities being disproportionally impacted by behaviours such as bullying, without outwardly showing any signs; and communication barriers and difficulties in overcoming these barriers.

10.2 To address these additional challenges, the college considers extra pastoral support for learners with SEN and disabilities.

Appendix 9: Stop and Search - Learners

Please refer tell 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 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.

Appendix 10: The Use of Reasonable Force

10.1 There are circumstances when it is appropriate for staff in schools 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.

10.2 When using reasonable force in response to risks presented by incidents involving children with SEN or disabilities or with medical conditions, schools 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, schools and colleges can reduce the occurrence of challenging behaviour and the need to use reasonable force.

10.3 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.

10.4 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.

Appendix 11: 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.