

**Policy: Child Protection / Safeguarding Policy**

**Date: September 2023**

**Approved by: Designated Safeguarding Lead (Director of Student Experience)**

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## **Introduction**

This policy applies to Gloucestershire College (the "College"). This policy is reviewed and updated annually (as a minimum) and is available on the College website and the intranet.

## **Definitions of safeguarding and types and signs of abuse**

Safeguarding and promoting the welfare of children or young people is defined as protecting children or young people from maltreatment; preventing impairment of their health or development; ensuring that children or young people grow up in circumstances consistent with the provision of safe and effective care; and taking action to enable all children or young people to have the best outcomes.

Abuse is a form of maltreatment of a child or young person. Somebody may abuse or neglect a child or young person by inflicting harm or by failing to act to prevent harm. Children or young people may be abused in a family or in an institutional or community setting by those known to them or, by others and online. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. They may be abused by an adult or adults or by another child/young person or children/young people (also known as child-on-child abuse).

Abuse can be:

- physical abuse;
- emotional abuse;
- sexual abuse/harassment; and/or
- neglect.

Staff are referred to Appendix 4 of this policy for further detail of the types of abuse and possible signs of abuse, as well as further information regarding specific safeguarding issues such as child criminal and/or sexual exploitation.

## **Commitment to safeguarding**

Gloucestershire College takes a whole College approach and is committed to safeguarding its students and staff. The College maintains the attitude of "it could happen here" where safeguarding is concerned and ensures safeguarding and child protection underpin all relevant aspects of process and policy development. All staff at Gloucestershire College have a duty to identify any students who may be experiencing or who are at risk of experiencing abuse or harm in College, at home, through online networks or in relationships and take appropriate action to ensure their safety. The College has a duty to always consider the best interest of the student and take action to enable all students to achieve the best outcomes. Staff do not assume safeguarding or promoting welfare is someone else's responsibility, and all staff are responsible for reporting concerns promptly to the Safeguarding Team.

Parents are encouraged to raise any concerns directly with the College, if necessary, using this safeguarding policy for concerns about the safety and/or welfare of our students. Parents may also contact OFSTED directly if they wish.

The College has arrangements for listening to our students and providing early help. Details of these arrangements can be found in Appendix 1 of this policy.

The College recognises that some students may not feel ready or know how to tell someone that they are being abused and all staff are trained to identify potential signs and seek advice accordingly.

Gloucestershire College aims to:

- Provide a safe and welcoming learning environment
- Ensure safe staff recruitment procedures built around Disclosure and Barring Service ("DBS") checks, through scrutiny of references and ongoing monitoring and review of practice
- Help staff and students alike to equip themselves with the information and awareness necessary to keep themselves safe
- Maintain and explicitly promote those procedures, which help to identify suspected cases of abuse, report and act upon them
- Provide appropriate support for students or staff if they are victims of abuse
- Contribute to effective partnership working between all those in the wider community involved in providing safeguarding services and the College itself
- Work with those partners to provide a co-ordinated offer of help when needed
- Provide clarity of support available at College for adult and vulnerable adult learners, as well as signposting to a range of external support that they can access.
- Ensure learners who are identified as vulnerable and/or high needs are closely supported and receive early help as required.
- Promote and endeavour to ensure safe and secure access to digital/online learning

In doing this Gloucestershire College shall provide and maintain a culture where safeguarding is thoroughly understood and embraced by all members of the College and applied with consistency. The College shall ensure that all College resources in safeguarding serve those groups identified as being vulnerable. In addition, compliance with the Equality Act 2010 is expected by all members of the College, both staff and students, and we recognise that some students with particular protected characteristics may be at higher risk than others.

The College will consider how to support students with protected characteristics and take positive action, where proportionate and lawful, to deal with the disadvantages these students face.

The College is committed to staff development through a range of mandatory and bespoke training, as well as robust conversations during appraisals and probation reviews. All staff are required to undertake a bi-annual safeguarding and prevent training module. New starters are expected to complete this within 2 weeks of their start date and understanding of safeguarding is checked throughout probation period.

In addition to this, Professional Development Days and specific sessions are themed around safeguarding topics that are relevant to the context in which staff are undertaking their roles.

To have assurance of the impact of the training/CPD, the level of understanding of staff and how safeguarding knowledge is implemented, the College is committed to ongoing assessment of staff. Testing is undertaken through:

- Assessment embedded into the mandatory safeguarding module
- Robust conversations through appraisals and probation reviews where staff must be able to demonstrate satisfactory understanding. New starters requiring additional support are identified and supported by the DSL.
- Safeguarding is embedded within school deep dives as part of the Teaching, Learning and Assessment schedule for the year and specific feedback provided to DSL.
- A short assessment for all staff on Professional Development Days to provide a temperature check (usually when themed around safeguarding topics, mental health and wellbeing).

- An annual staff survey during the spring term to measure how confident staff feel around safeguarding.

## **Mental Health**

The College has an important role to play in supporting the mental health and wellbeing of its students. All staff should be aware that mental health problems can, in some cases, be an indicator that a student has suffered or is at risk of suffering abuse, neglect or exploitation.

Staff are well placed to observe students day to day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one. In the event of a mental health concern, advice and guidance will be sought from the College's Mental Health Lead.

The details of the College's Safeguarding Team are published on the College website (including how they can be contacted), on visible posters within the College, on leaflets and videos and through face to face introductions with learners.

## **1 Students and Studying**

Because Safeguarding is of the utmost importance to us, students can expect the following from the College:

- A safe environment to study in
- Appropriate online safety policies, including filters and monitoring systems in place on College computers and online
- A visible, trained and informed Safeguarding Team
- Allegations taken seriously and responded to appropriately
- A rigorous approach to investigating Safeguarding concerns
- Timely referrals to Social Care if deemed appropriate and necessary
- Referrals and signposting to relevant external support agencies
- A secure and confidential recording system for disclosures
- Strong links with external support agencies
- Well trained and approachable staff
- Visible internal support links
- When on placement, organisations will be asked to put in place appropriate safeguards
- If undertaking an apprenticeship, the employer will understand their responsibilities for safeguarding
- Where third party providers are subcontracted in to deliver training, robust safeguarding procedures will be place
- Information regarding the College's safeguarding principles, practices and contact information (including a copy of this policy) is available on the public website
- Safeguarding information (including a copy of this policy) is available on the student homepage
- Regular updates on key safeguarding themes
- To be taught about safeguarding, including online safeguarding and the safe use of technology
- The opportunity to engage in safeguarding campaigns
- That students who have SEN will be identified as being more vulnerable and therefore receive additional pastoral support
- That staff have the skills, knowledge and understanding necessary to keep safe students that are looked after by a local authority. David Kettley is the designated member of staff who has responsibility for their welfare and progress.

We are confident that our students will have a safe and enjoyable learning experience.

So, ours is a college where, for example:

- Safeguarding is a number one priority
- Every member of staff is equipped to take a safeguarding disclosure
- Students are listened to and taken seriously when reporting concerns
- Ignoring a safeguarding concern is unthinkable
- All staff are aware of safeguarding reporting procedures
- Students are educated about how to report a concern
- Students have information available to them on a wealth of safeguarding topics
- If students leave the College the Local Authority is notified.

## 2 Staff and Working

Because Safeguarding is of the utmost importance to us, the College:

- Works in accordance with the Department for Education ("DfE") guidance Keeping Children Safe in Education 2023
- Has a Designated Safeguarding Lead ("DSL"), David Kettlety and a Deputy DSL ("DDSL") Sandra Tyrrell, who have responsibility for coordinating actions
- Has named Designated Safeguarding Officers ("DSOs") who are regularly and appropriately trained to work with our students following a disclosure
- Trains all staff to recognise signs of abuse
- Ensures staff know how to report concerns or suspicions of abuse
- Has procedures in place for handling suspected cases of abuse of students
- Ensures staff with designated responsibility for safeguarding receive regular and appropriate training
- The DSL/DDSL receives training in accordance with Annex C of Keeping Children Safe In Education ("KCSIE"), including updated child protection training at least every 2 years and their knowledge and skills are updated at least annually to keep up with any developments relevant to their role
- Trains all staff and volunteers on safeguarding on their first day and if this is not possible then within the first month
- Trains all Managers on Safer Recruitment within their first 6 months of starting their managerial role and using the DBS / Teaching Regulation Agency to check suitability of teachers (see Appendix 3)
- Shows all new starters where to find safeguarding information on the intranet and College website
- Informs all new staff about the safeguarding campaigns, where they can find additional information on specific safeguarding topics
- Requires all staff to undertake an online safeguarding training module (which includes Prevent awareness training), every two years
- All staff are provided with regular informal updates, at least annually, to provide them with relevant skills and knowledge to safeguard our students effectively. The College provides these via, for example, safeguarding campaigns and termly newsletters.

We know that well-informed and trained staff promote a safe and healthy environment for our students. We are better placed to support our students when we work together with the agreed outcome of keeping our students safe. Therefore, at induction we support staff in their awareness of safeguarding where all staff before or at induction will complete the on-line safeguarding module (including PREVENT) and be issued with KCSIE Part 1 or Annex A and will confirm that they have read and understood it. College leaders and staff that work directly with children or young people are also required to read Annex B and Part 5 of KCSIE, and copies of these parts are provided at induction.

All new staff are also directed to the safeguarding policy and details of the safeguarding team, including the DSL and DDSL.

We know that because abuse does happen, and safeguarding concerns are raised, we promote a culture where, for example:

- Abuse is not acceptable
- Disclosures of abuse are taken seriously
- Students feel confident to talk to any member of staff if they are not feeling safe.

Ignoring a safeguarding concern would not be acceptable in any way.

So, ours is a college where, for example

- Staff are confident when dealing with a safeguarding concern
- Extra training is available should a member of staff feel they want it
- Staff ethos is to ensure the safety of our students
- Our staff know how to report a concern and the procedures to follow

### **3 Leadership and Managing**

Ensuring the College is a safe and secure environment is the responsibility of the Governing Body. They will:

- Review the Safeguarding Policy at least annually (which includes Prevent) including an update and review of the effectiveness of procedures and their implementation, including lessons learnt
- Ensure the College operates safer recruitment procedures
- Confirm the College has robust procedures in place for dealing with allegations
- Receive an annual report on Safeguarding practices and training from the College's DSL
- Undertake regular safeguarding training

David Kettley is the DSL and Sandra Tyrrell is the DDSL. Their contact details can be found in the Key Contacts section at the end of this policy.

Whilst the Governors are ultimately responsible for ensuring staff are competent and trained, supported and regularly reviewed in relation to safeguarding, the ultimate lead responsibility for safeguarding and child protection remains with the DSL and this responsibility should not be delegated. That being said, the activities of the DSL can be delegated to appropriately trained deputies.

The DSL has an amendment to their job description outlining their responsibilities. The key responsibilities are:

- Lead and develop the implementation of safeguarding policy and procedure through the effective management of the safeguarding team;
- Ensure that the College is meeting statutory requirements and best practice by building strong relationships with external safeguarding stakeholders including PREVENT;
- Refer incidents to third parties (including the local authority children's services, the DBS, Channel and the police) where appropriate; Act as a point of contact with the three safeguarding partners and work with other agencies in line with WT;
- Liaise with the senior mental health lead where safeguarding concerns are linked to mental health;
- Liaise with the Principal to inform him or her of issues, especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations;

- As required, liaise with the “Case Manager” (as per Part four) and the designated officer(s) at the local authority (“LADO”) for child protection concerns in cases which concern a staff member;
- Liaise with staff and provide support (especially pastoral support staff, College nurses, IT Technicians, and SENCOs or the named person with oversight for SEN in a college) on matters of safety and safeguarding (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies; and
- Act as a source of support, advice and expertise for all staff.

Full details of the DSL’s role can be found at Annex C of KCSIE.

#### **4 Leadership from the Top**

Mary James is the board-level lead designated to take a lead in relation to responsibility for the safeguarding arrangements in the College. Contact details can be found in the Key Contacts section at the end of this policy.

A review of the College’s child protection policies takes place at least annually including an update and review of the effectiveness of procedures and their implementation. The College’s safeguarding policies and procedures should be transparent, clear, and easy to understand for staff, students, parents, and carers. The College draws on the expertise of staff, including the DSL(s), in shaping the College’s safeguarding arrangements and policies.

The governing body will ensure that all governors 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 college approach to safeguarding. Their training should be regularly updated.

The governing body are aware of their obligations under the Human Rights Act 1998 (HRA), the Equality Act 2010, and their local multi-agency safeguarding arrangements. Under the Human Rights Act 1998, it is unlawful for the College to act in a way that is incompatible with the European Convention on Human Rights (ECHR) Convention. Being subjected to harassment, violence and/or abuse, including that of a sexual nature, may breach conventions set out in the ECHR Convention.

If there has been a substantiated allegation against a member of staff, the College will work with the LADO 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.

#### **5 Local Community and Employer Engagement**

The College works with a large number of employers on, for example, apprenticeship schemes and work experience.

Employers will be asked to cooperate with the College in putting in place and subscribing to appropriate safeguards but ultimate responsibility will still sit with the College.

The College ensures that when an apprentice is placed with an employer, the employer understands their responsibilities for safeguarding particularly if they are under 18.

Working with employers and external agencies allows us to provide a holistic approach to safeguarding our students whereby we can demonstrate:

- A commitment to safeguarding our students

- A guarantee regarding the well-being of our students
- Involvement with the local community and a commitment to keep our students safe whether on site, on placement or in the work place

The College liaises with Gloucestershire Safeguarding Children's Executive when disclosures / allegations are made that raise causes for concern. We work with a number of local external agencies and will signpost out to these agencies when appropriate and necessary. In addition to this, the College hosts termly Multi-Agency information sharing meetings with external agencies.

The College is proactive strategically within community groups where the DSL is a member for the Gloucestershire Safeguarding Children Education Committee and a member of the County Prevent Board.

## 6 Places and Spaces – Our Environment

Ensuring our staff and students are aware of who our Safeguarding Officers are and how to report a concern are of paramount importance to us.

Displaying accurate information regarding our Safeguarding Team, and how to contact them makes them visible and accessible to all – helping to create a safe environment.

Ways in which the Safeguarding Team is accessible and visible are:

- Safeguarding Officers are present on each site of the College
- Safeguarding Officers wear bright pink lanyards which distinguish them from other staff
- Posters showing photographs of the Safeguarding Team and additional information are displayed in reception areas, in prominent spaces and in classrooms/staffrooms throughout the College
- Designated boards for Safeguarding information can be found in central locations on all sites
- An email address specifically for safeguarding concerns is advertised throughout the College – [safeguarding@gloscol.ac.uk](mailto:safeguarding@gloscol.ac.uk)
- A dedicated inbox for all safeguarding emails is staffed throughout each working day (09:00-17:00)
- Safeguarding information leaflets and lanyards are given to all visitors upon arrival at the College
- Safeguarding campaigns are displayed in noticeable areas of each site and link to our newsletters and campaigns

Ours is a College where, for example:

- A student can ask any member of staff for help regarding a safeguarding concern and feel confident in their response and approach in dealing with the situation

Not every student will be safe from abuse, due to factors beyond our control, but we will do our utmost to protect and educate both staff and students on safeguarding warning signs and make it clear how staff and students can report any safeguarding concerns.

## 7 Our Safeguarding Procedures

Our duty is to provide a safe and welcoming learning environment, where students are respected and valued and are capable of making excellent progress in their learning. We aim to provide an environment where safeguarding is thoroughly understood and embraced by all members of the College and applied with a high degree of consistency.

We are committed to helping staff and students alike to equip themselves with the information and awareness necessary to keep themselves safe.

## **Safer Recruitment**

We ensure safe staff recruitment procedures built around DBS checks, through scrutiny of references and ongoing monitoring and review practice. Members of the teaching and non-teaching staff at the College (including part-time staff, volunteers, temporary and supply staff, and visiting staff, such as musicians and sports coaches) are subject to the necessary statutory child protection checks before starting work, for example, right to work checks, additional overseas checks (if necessary), verifying identity, taking up references, checking work history and confirming medical fitness for the role. For most appointments, an enhanced DBS check with 'barred list' information will be appropriate. A DBS certificate will be obtained from the candidate before or as soon as practicable after appointment. Alternatively, if the applicant has subscribed to it and gives permission, the College may undertake an online update check through the DBS Update Service.

Full details of the College's safer recruitment procedures for checking the suitability of staff, Governors and volunteers to work with children and young people is set out in the College's Recruitment and Selection Policy.

## **Visiting Speakers**

The College has clear protocols for ensuring that any visiting speakers are appropriately supervised and suitable. The College's responsibility to students is to ensure that they can critically assess the information they receive as to its value to themselves, and that the information is aligned to the ethos and values of the College and British values.

The College is required to undertake a risk assessment before agreeing to a Visiting Speaker being allowed to attend the College. This will take into account any vetting requirements considered appropriate in the circumstances and may include a DBS check if relevant.

Visiting speakers will be expected to understand that, where appropriate, their session should actively promote the British values of democracy, the rule of law, individual liberty and mutual respect and tolerance of those with different faiths and beliefs and at no point undermine these. In some cases, the College may request a copy of the Visiting Speaker's presentation and/or footage in advance of the session being provided.

The College's protocols for ensuring that any visiting speakers, whether invited by staff or students themselves, are suitable and appropriately supervised is set out in the College's Recruitment and Selection Policy.

## **Prevent duty**

The Prevent Agenda is part of the wider counter-terrorism strategy CONTEST. The aim of the Prevent Agenda is to stop people from taking part in, or supporting, terrorism. The College has a statutory duty (as set out in Section 26(1) of the Counter Terrorism and Security Act 2015) known as the Prevent duty. The College must have regard to the need to prevent young people from being drawn into terrorism, when carrying the functions of a college.

The College ensures regard is given to the Prevent duty throughout the running of the College in a number of ways. Risk assessments are carried out to assess any risk of students or staff being drawn into terrorism. This includes when visiting speakers attend the College (as discussed above) and where external events are held by third party individuals, external bodies or community groups. The College has clear procedures and policies in place to support their Prevent duty such as this policy, the Equality, Diversity and Inclusion Policy, Whistleblowing Policy and IT policy.

The College undertakes Prevent awareness training with all members of staff at the point of induction and at least every two years. The Safeguarding team take responsibility for delivering contextualised Prevent awareness training for staff.



## **Managing Allegations**

The College is dedicated to maintaining and explicitly promoting its safeguarding procedures, which help to identify suspected cases of abuse, reporting and acting upon them. We will provide appropriate support to students or staff who have been the victim of abuse. Examples of types of abuse can be found at Appendix 4.

The College's procedures for dealing with concerns about a student can be found at Appendix 1.

The process for reporting and dealing with allegations against members of staff or volunteers can be found at Appendix 4.

In addition, we will contribute to effective partnership working within the College and between all those in the wider community involved in providing safeguarding services.

## **8 Our College Values**

### **Be Respectful**

- To be respectful of self, others, property and environment when at college or representing the college.
- To care for one another, our surroundings and the community.
- To be inclusive of others and everyone; listening, respecting and showing consideration for people's qualities, differences, beliefs and views.
- To create a sense of trust, safety and well-being
- To be non-judgemental and polite. Be friendly, welcoming, supportive and inclusive.
- To demonstrate respect through all forms of communication.

### **Be Responsible**

- To take ownership of my behaviour, attitude and learning/development.
- To be responsible and accountable for my own actions and the impact that I have on the college, and wider, community.
- To be mindful of the wellbeing of others.
- To be mindful of the way I communicate with others, making sure that my communications reflect the college values.

### **Be Ambitious**

- To be ambitious and aspirational for our learners and one another and celebrate successes
- To demonstrate and commit to continuously improve, learn and succeed for yourself, for others and the college
- To show positive aspirations and determination in your plans and actions
- To be supportive of everyone and encourage their positive ambitions.
- To provide opportunities for everyone to improve and succeed

### **Be Collaborative**

- To work as part of a team or teams, to support each other to contribute to the success of self, others and the GC Community
- To contribute, listen, communicate and work with each other to develop and grow together.
- Working together with purpose, to have a positive impact on the college and be responsive to change.
- To be inclusive, encouraging and supportive when working as a team and across teams
- To use effective communication when working together
- To be a team player, by being reflective, creative and sharing ideas that support improvements

## 9 The Legal Context

The College acts in accordance with the following legislation and guidance:

- Keeping Children Safe in Education September 2023
- Working Together to Safeguard Children 2018 ("WT")
- CONTEST Counter Terrorism Strategy 2018
- Safeguarding Vulnerable Groups Act 2006
- Safeguarding Vulnerable Adults Act 2006
- The Children's Act 1989 and 2004
- Sexual Offences Act 2003
- Counter Terrorism and Security Act 2015
- Revised Prevent Duty Guidance for England and Wales (2023)
  - The Prevent Duty Guidance: for further education institutions in England and Wales April 2021
  - The use of social media for on-line radicalisation (July 2015)
- Gloucestershire Children's Safeguarding Executive
- Disclosure and Barring Service
- Equality Act 2010
- Children and Families Act 2014
- Procedures for Gloucestershire Children's Safeguarding Executive
- Child Sexual Exploitation – Definition and Guide for Practitioners – 2017
- Sexual Violence and Sexual Harassment Between Children in Schools and Colleges (September 2021)
- Disqualification under the Childcare Act 2006 (August 2018)
- What to do if you're worried a child is being abused: advice for practitioners (March 2015)
- Information sharing: advice for practitioners providing safeguarding services (July 2018)
- Sexting in schools and colleges: Responding to incidents and safeguarding young people (August 2016)
- Sharing nudes and semi-nudes: advice for education settings working with children and young people (December 2020)

This policy also takes into account the procedures and practice of Gloucestershire County Council as part of the inter-agency safeguarding procedures set up by the Gloucestershire Safeguarding Children Executive.

In accordance with the DfE guidance KCSIE 2023, the College complies with the following responsibilities:

- Staff are trained to recognise the signs of abuse and know to whom they should report concerns or suspicions
- Procedures are in place (which staff are aware of) for handling suspected cases of abuse of students, including procedures to be followed if a member of staff is accused of abuse, or suspected abuse
- The DSL has responsibility for coordinating action in the College and for liaising with other agencies
- Staff with designated responsibility for safeguarding receive appropriate training.

### RELATED POLICIES

<b>Health &amp; Safety Policy</b>
<b>Recruitment and Selection Policy</b>
<b>Student Agreement</b>
<b>Staff Code of Conduct</b>

## Appendix 1

### Procedures for dealing with concerns about a child or young person

If staff suspect or hear any allegation or complaint of abuse, exploitation, or neglect from a student or any third party, they must act immediately and follow the relevant procedure below. Staff should not assume that somebody else will take action and share information that might be critical in keeping children and young people safe.

The guidance, Information Sharing: Advice for Practitioners Providing Safeguarding Services to Children, Young People, Parents and Carers supports staff who have to make decisions about sharing information. The Governing Body recognises the importance of information sharing between practitioners and local agencies, including ensuring arrangements for sharing information within the College and with local authority children's social care, the safeguarding partners and other organisations, agencies, and practitioners as required. Fears regarding sharing information under the Data Protection Act 2018 (DPA) and the UK GDPR should not be allowed to stand in the way of the need to promote the welfare, and protect the safety of children and young people, and neither the DPA 2018 or the UK GDPR prevent the sharing of information for the purposes of keeping children and young people safe. If in doubt about what information can and should be shared, staff should speak to the DSL.

The Governing Body will ensure that staff understand the relevant data protection principles which allow them to share (and withhold) personal information, including:

- being confident of the processing conditions which allow them to store and share information for safeguarding purposes, including information, which is sensitive and personal and should be treated as 'special category personal data'
- understanding that 'safeguarding of children and individuals at risk' is a processing condition that allows the sharing of special category personal data, including without consent where there is good reason to do so. For example, information may be shared without consent where: it is not possible to gain consent; it cannot be reasonably expected to gain consent; and, gaining consent would place a child or young person at risk
- not providing students' personal data where the serious harm test is met.

All staff should:

- listen carefully
- avoid asking leading questions
- reassure the individual that the allegation/complaint will be taken seriously and that they will be supported and kept safe
- ensure that the individual is not made to feel ashamed for making the report or given the impression that they are creating a problem by making the report
- not guarantee absolute confidentiality (as this may ultimately not be in the best interests of the student) and explain that the information needs to be passed to the appropriate person who will ensure that the correct action is taken
- be aware that the individual may not feel ready or know how to tell someone that they are being abused, exploited or neglected, and/or may not recognise their experiences as harmful. Staff should exercise professional curiosity and speak to the DSL if they have concerns
- determine how best to build trusted relationships with children and young people which facilitate communication.

All concerns, discussions and decisions (together with reasons) made under these procedures should be recorded in writing. This will help if/when responding to any complaint about the way a case has been handled. The record should include a clear and comprehensive summary of the concern, details of how the concern was followed up and resolved and a note of any action taken, the decision reached and the outcome. Additionally, the record should include the date, time and place of the conversation and detail of what was said and done by whom and in whose presence and signed by the person making it. The information should be kept confidential and stored securely, ensuring that the file is only

accessible to those who need to see it, and is shared in accordance with the guidance set out in Parts one and two of KCSIE 2023.

Where the allegation relates to harmful sexual behaviours, if possible the disclosure should be managed with two members of staff present (preferably one of them being the DSL or DDSL).

Where there is a safeguarding concern, the College will ensure the student's wishes and feelings are taken into account when determining what action to take and what services to provide. This is particularly important in the context of harmful behaviours, such as sexual harassment and sexual violence. The College manages this by providing a Student Mentor who will meet with the students on a regular basis and raise any concerns with the Safeguarding team and through the safeguarding inbox. The College also operates a feedback mechanism called Talk Back and regularly holds Student Forums where issues can be raised and discussed. The College operates its processes with the best interests of its student/s at the centre.

## **Contextual Safeguarding**

Safeguarding incidents and/or behaviours can be associated with factors outside the College and can occur between students outside College. All staff, but especially the DSL and DDSL, should consider the context within which such incidents and/or behaviours occur. The College will as part of the wider assessment of students, consider whether environmental factors are present in a student's life that are a threat to their safety and/or welfare. The College will share as much information with Children's Social Care as possible as part of the referral process to enable consideration of all the available evidence and the full context of any abuse.

## **Early Help**

Any child or young person may benefit from early help but all staff should be particularly alert to the potential need for early help for a child or young person who:

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

Early help means providing support as soon as a problem emerges at any point in a child or young person's life, from the foundation years through to the teenage years.

In the first instance, staff who consider that a student may benefit from early help should discuss this with a Safeguarding Officer from the safeguarding team. The Safeguarding Officer will consider the appropriate action to take in accordance with the Gloucestershire Safeguarding Children Executive

referral threshold document. The Safeguarding Officer will liaise with external agencies and professionals in an inter-agency assessment, as appropriate. If early help is appropriate, the matter will be kept under review and consideration given to a referral to children's social care if the student's situation does not appear to be improving.

### **What staff should do if they have concerns about a child or young person**

If staff (including governors, supply staff, agency staff and volunteers) have any concerns about a student (as opposed to a student being in immediate danger), they should, where possible, speak with a member of the safeguarding team to agree a course of action, although staff can make a direct referral to children's social care. As set out above, staff should not assume that somebody else will take action and share information that might be critical in keeping children or young people safe; they should maintain an attitude of "it could happen here". If anyone other than the safeguarding team make a referral, they should inform the DSL as soon as possible that a referral has been made. If a student's situation does not appear to be improving, the DSL should press children's social care for reconsideration. Staff should challenge any inaction and follow this up with the DSL and children's social care as appropriate. All concerns, discussions and decisions made and the reasons for those decisions should be recorded in writing.

### **What staff should do if a child or young person is in danger or at risk of harm**

If staff (including governors, supply staff, agency staff and volunteers) believe that a student is in immediate danger or at risk of harm, they should make an immediate referral to children's social care and/or the Police. Anyone can make a referral. Any such referral must be made immediately and in any event within 24 hours (one working day) of staff being aware of the risk. Parental consent is not needed for referrals to statutory agencies such as the emergency services. If anyone other than the DSL makes a referral, they should inform the DSL as soon as possible that a referral has been made. The local authority social worker should acknowledge receipt to the referrer within 24 hours and make a decision about the next steps and type of response required. Staff should challenge any inaction and follow this up with the DSL and children's social care as appropriate. All concerns, discussions and decisions made and the reasons for those decisions should be recorded in writing.

The College's Local Safeguarding Children Executive is Gloucestershire. A full copy of their local procedures can be found [here](#).

### **What staff should do if a child or young person is seen as at risk of radicalisation**

Staff should follow the College's normal referral processes when there are concerns about children or young people who may be at risk of being drawn into terrorism, as set out above. This may include a referral to Channel or children's social care depending on the level of risk. However, if staff have concerns that there is an immediate/significant risk of a child or young person being drawn into terrorism they must call 999 and submit a referral to the MASH. Advice and support can also be sought from children's social care.

The College, in recognition that students may be at risk of being drawn into terrorism or other forms of extremism, carries out appropriate risk assessments (following consultation with local partners, such as the Police) of the potential risk in the local area. Such risk assessments are discussed with the Principal, DSL and Governor responsible for safeguarding to ensure the College's safeguarding arrangements are sufficiently robust to help prevent and protect children and young people from being drawn into terrorism and are regularly revised.

### **What staff should do if they discover an act of Female Genital Mutilation ("FGM")**

Staff must report to the Police cases where they discover that an act of FGM appears to have been carried out. Unless the member of staff has a good reason not to, they should still consider and discuss any such case with DSL and involve children's social care as appropriate. Staff are referred to Appendix 4 of this policy for the procedure to be followed where they suspect that a student may be at risk of FGM.

## **What staff should do if they have concerns that children or young people are at risk from or involved with serious violent crime**

All staff should be aware of indicators which may signal that children or young people are at risk from, or are involved with serious violent crime. These may include increased absence from College, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, signs of assault or unexplained injuries.

If staff have any concerns about a child or young person (as opposed to being in immediate danger), they should, where possible, speak with a member of the safeguarding team to agree a course of action, although staff can make a direct referral to children's social care.

## **What staff should do if a child or young person goes missing from education**

Children or young people who go missing from education, particularly persistently, can be a vital warning sign to a range of safeguarding issues, including neglect and child sexual and/or criminal exploitation, particularly county lines. It is therefore important that the College's response to such absence supports identifying such abuse and helps prevent the risk of them going missing in the future. The College's procedures for unauthorised absence and for dealing with children or young people who go missing from education are set out in the Attendance Procedure which can be found on the College's intranet. Further detail can also be found at Appendix 4 of this policy.

Where reasonably possible, the College will hold more than one emergency contact number for each student to provide the College with additional options to make contact with a responsible adult particularly when a student missing from education is also identified as a welfare and/or safeguarding concern.

The College will report to Gloucestershire County Council a student who fails to attend college regularly or has been absent from college without the College's permission for a continuous period of 4 weeks or more.

## **How should staff respond to an incident of nudes and semi-nudes being shared by pupils**

All members of staff in an education setting have a duty to recognise and refer any incidents involving nudes and semi-nudes and will be equipped with the necessary safeguarding training and support to enable them to recognise concerns.

For this purpose, 'sharing nudes/semi-nudes' means the sending or posting of nude or semi-nude images, videos, or live streams by children and young people under the age of 18 online. This could be via social media (including Snapchat), gaming platforms, chat apps (including WhatsApp and iMessage) or forums. It could also involve sharing between devices via services like Apple's AirDrop which works offline. The sharing of nudes and semi-nudes may happen publicly online, in 1:1 messaging or via group chats and/or via closed social media accounts. The images, videos or live streams may include more than one child or young person.

Any direct disclosure by a student will be taken seriously and staff will ensure the student is feeling comfortable and will only ask appropriate and sensitive questions, in order to minimise further distress or trauma to them.

If staff are notified or become aware of an incident of nudes or semi-nudes being shared by a student or of a student, they should refer the incident to the DSL as soon as possible.

The DSL will follow the DDMSC / UKIS guidance "*Sharing nudes and semi-nudes: advice for education settings working with children and young people*" (December 2020) when responding to a report of sharing nudes and/or semi-nudes. This will include:

- Holding an initial review meeting with appropriate staff. This may include the staff member(s) who heard the disclosure and the safeguarding team who deal with safeguarding concerns.

- Carrying out interviews with the student involved (if appropriate).
- Informing parents and carers at an early stage and keep them involved in the process in order to best support the student unless there is good reason to believe that involving them would put the child or young person at risk of harm. Any decision not to inform them should be made in conjunction with other services such as children's social care and/or the police, who would take the lead in deciding when they should be informed.
- Carrying out a risk assessment to determine whether there is a concern that a child or young person has been harmed or is at risk of immediate harm at any point in the process
- If not, the incident can be handled in college in accordance with the "sharing nudes" guidance and the College's Child Protection and Behaviour policies.
- If it is determined that there is a risk of harm, the DSL must make a referral to children's social care and/or the police immediately.

All incidents relating to nudes and semi-nudes being shared need to be recorded, whether they have been referred externally or not. Colleges must record the reason for not reporting incidents externally and ensure it is signed off by the Principal. Records will be kept in line with statutory requirements set out in KCSIE and local safeguarding procedures. No copies of imagery will be taken or retained.

This guidance does not apply to the sharing of images of children or young people under 18 by an adult over 18 as this constitutes child sexual abuse. In the event that staff become aware of such an incident, they should notify the DSL immediately, who should always inform the Police as a matter of urgency.

### **What staff should do if a student needs a social worker (Children in Need and Child Protection Plans)**

Students may need a social worker due to safeguarding or welfare needs. Students may need this help due to abuse, neglect and complex family circumstances. A student's experiences of adversity and trauma can leave them vulnerable to further harm, as well as educationally disadvantaged in facing barriers to attendance, learning, behaviour, and mental health.

Local authorities should share the fact a student has a social worker, and the DSL should hold and use this information so that decisions can be made in the best interests of the student's safety, welfare, and educational outcomes. This should be considered as a matter of routine.

Where students need a social worker, this should inform decisions about safeguarding (for example, responding to unauthorised absence or missing education where there are known safeguarding risks) and about promoting welfare (for example, considering the provision of pastoral and/or academic support, alongside action by statutory services).

### **What staff should do if they have concerns about another staff member**

If staff have any concerns about another staff member (including supply staff, agency staff, volunteers and contractors), then this should be referred to the Principal. Where there are concerns about the Principal, this should be referred to the Chair of Governors. In the event of allegations of abuse being made against the Principal, staff are referred to the procedures set out in Appendix 4 regarding managing allegations of abuse against staff (including supply staff, agency staff, volunteers and contractors) and refer the matter directly to the LADO at the Gloucestershire County Council. The contact details for the LADO can be found on the Key Contacts page at the start of this policy.

### **What staff should do if they have concerns about safeguarding practices in the College**

The College aims to ensure there is a culture of safety and raising concerns and an attitude of 'it could happen here'. Where staff have concerns about poor or unsafe practices and potential failures in the College's safeguarding systems, these should be raised in accordance with the College's whistleblowing procedures which can be found on the Colleges intranet. There will be no disciplinary action taken against a member of staff for making such a report provided that it is done in good faith.

If staff and volunteers feel unable to raise an issue with the College or feel that their genuine concerns are not being addressed, they may use other whistleblowing channels, such as the NSPCC whistleblowing advice line. Contact details for the NSPCC helpline can be found on the Key Contacts page at the start of this policy.

## **ARRANGEMENTS FOR DEALING WITH CHILD-ON-CHILD ALLEGATIONS (INCLUDING CHILD ON CHILD SEXUAL VIOLENCE AND HARASSMENT)**

Child-on-child abuse is abuse by one or more children or young people against another child or young person. It can be standalone or as part of wider abuse and can happen both inside and outside of college, and online. It can manifest itself in many ways and can include abuse within intimate partner relationships, bullying (including cyber bullying, prejudice-based and discriminatory bullying), physical abuse, initiation/hazing type violence and rituals, upskirting, sexting, sexual assault, gender-based issues, harmful sexual behaviours including child on child sexual violence and sexual harassment, 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. It can also occur through a group of children or young people sexually assaulting or sexually harassing a single child/young person or group of children/young people.

Children and young people can also abuse online and this can take the form of harassing and misogynistic/misandrist messages, the consensual and non-consensual sharing of nudes and/or semi nudes and indecent images, especially around group chats, and the sharing of abusive images and pornography, to those who do not wish to receive such content.

These arrangements apply to all reports and concerns of child on child abuse, whether they have happened in college or outside of it, and/or online. Abuse that occurs online or outside of college should not be downplayed and should be treated equally seriously.

Staff will address inappropriate behaviour (even if it appears to be relatively innocuous) to help prevent problematic, abusive and/or violent behaviour in the future. The College takes a zero-tolerance approach and abusive comments and interactions should never be passed off or dismissed as “banter” or “part of growing up”. Nor will harmful sexual behaviours be dismissed as the same or “just having a laugh” or “boys being boys”. Staff will also challenge physical behaviours (that are potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them.

The College acknowledges that even if there have been no reported cases of child on child abuse in relation to students within the College, such abuse may still be taking place and is simply not being reported. The College will ensure that students are aware of how they can report abuse, and that they are aware of the procedures that the College will follow once a report has been made. These procedures will be well promoted and in a format that is easily accessible and easily understood by students.

The College recognises that a student is likely to disclose an allegation to someone they trust: this could be any member of staff. By making such a disclosure the student is likely to feel that the member of staff is in a position of trust. The College also recognises that students may not find it easy to tell staff about their abuse verbally and that instead they may show signs or act in ways they hope adults will notice and react to. It is also recognised that an incident may come to a member of staff's attention through a report of a friend, or by overhearing conversations. It is therefore important that all staff are clear on the College's policy and procedures with regards to child on child abuse, and can recognise the indicators and signs of child on child abuse and know how to identify it and how to respond to reports.

The College recognises that a first disclosure to a trusted adult may only be the first incident reported. It is not necessarily representative of a singular incident. Staff will take all reports of abuse seriously regardless of how long it has taken for the child or young person to come forward. Staff will act immediately and will support the victim when they raise a concern.



The College recognises that children or young people with special educational needs and disabilities (SEND) or certain health conditions are three times more likely to be abused by their peers, can face additional safeguarding challenges and may be more prone to child on child group isolation or bullying (including prejudice-based bullying) than other children or young people. The College will consider extra pastoral support for those students from a member of the safeguarding team who specialises in such support.

Where an issue of student behaviour or bullying gives 'reasonable cause to suspect that a child or young person is suffering, or is likely to suffer, harm', staff should follow the procedures below rather than the College's Anti-Bullying and Behaviour policies.

A student against whom an allegation of abuse has been made may be suspended from the College during the investigation. The College will take advice from the Gloucestershire Safeguarding Children Executive on the investigation of such allegations and will take all appropriate action to ensure the safety and welfare of all students involved including the alleged victim and perpetrator/s. If it is necessary for a student to be interviewed by the Police in relation to allegations of abuse, the College will ensure that, subject to the advice of the Gloucestershire Safeguarding Children Executive, parents are informed as soon as possible and that the students involved are supported during the interview by an appropriate adult and until the investigation is completed. Confidentiality will be an important consideration for the College and advice will be sought as necessary from Gloucestershire Safeguarding Children Executive and/ or the Police as appropriate. The College will have regard to the procedures set out in KCSIE and the Sexual Violence and Sexual Harassment Between Children in Schools and Colleges advice (September 2021) ("SVSH") at all times.

The victim may ask the College not to tell anyone about the sexual violence or sexual harassment. Advice should be sought from the DSL or DDSL who should consider: parents or carers should normally be informed unless doing so would put the victim at greater risk; the basic safeguarding principle that if a child or young person is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to local authority children's social care; and whether a crime has been committed. Ultimately, the DSL or DDSL will balance the victim's wishes against their duty to protect the victim and other children and young people.

Police may be informed of any harmful sexual behaviours which are potentially criminal in nature, such as grabbing bottoms, breasts and genitalia. Rape, assault by penetration and sexual assaults will be passed to the police. Where a report has been made to the police, the College will consult the police and agree what information can be disclosed to staff and others, in particular, the alleged perpetrator(s) and their parents or carers. If the DSL decides to make a referral to children's social care and/or a report to the police against a victim's wishes, the reasons should be explained to the student and appropriate specialist support offered. The DSL may also decide that the children or young people involved may benefit from early help, and may make the necessary referral in accordance with the Gloucestershire Safeguarding Children Executive referral process.

The College will respond to incidents of sexting in line with the procedure as set out in the "Sexting in schools and colleges: Responding to incidents and safeguarding young people" guidance produced by the UK Council for Internet Safety, available [here](#).

In the event of disclosures about child-on-child abuse (including sexting), all students involved (both victim and perpetrator) will be treated as being at risk, and safeguarding procedures in accordance with this policy will be followed. Victims will be supported by the DDSL and support from external agencies will be sought, as appropriate.

When there has been a report of sexual violence, the DSL will make an immediate risk and needs assessment. Where there has been a report of sexual harassment, the need for a risk assessment should be considered on a case-by-case basis. The risk and needs assessment should consider:

- the victim;
- whether there may have been other victims;
- the alleged perpetrator(s); and

- all the other students (and, if appropriate, staff) at the College especially any actions that are appropriate to protect them from the alleged perpetrator(s), or from future harms.

Risk assessments will be recorded (written or electronic) and kept under review. In relation to a report of sexual violence or sexual harassment, the DSL (and indeed all staff) will reassure any victim that they are being taken seriously and that they will be supported and kept safe. The victim will never be made to feel ashamed for making a report nor will they be given the impression that they are creating a problem by reporting sexual violence or sexual harassment; nor would a victim ever be made to feel ashamed for making a report or have their experience minimised. The College will explain to the child in a way that avoids alarming or distressing them that the law is in place to protect children and young people rather than to criminalise them. The College will consider the age and the developmental stage of the victim, the nature of the allegations and the potential risk of further abuse. The College acknowledges that, by the very nature of sexual violence and sexual harassment, a power imbalance is likely to have been created between the victim and alleged perpetrator(s). The DSL will consider the risks posed to students and put adequate measures in place to protect them and keep them safe and to ensure their educational attainment is not adversely affected as far as is possible. This may include careful consideration of the proximity of the victim and alleged perpetrator and considerations regarding shared classes, sharing College premises (including during any before or after college-based activities) and College transport. The College will also consider the risks posed to the victim from other health needs, including physical, mental and sexual health problems, as well as unwanted pregnancy which may arise as a result of the incident, and will consider recommending additional support.

The College will consider intra familial harms and whether any support for siblings is necessary following an incident.

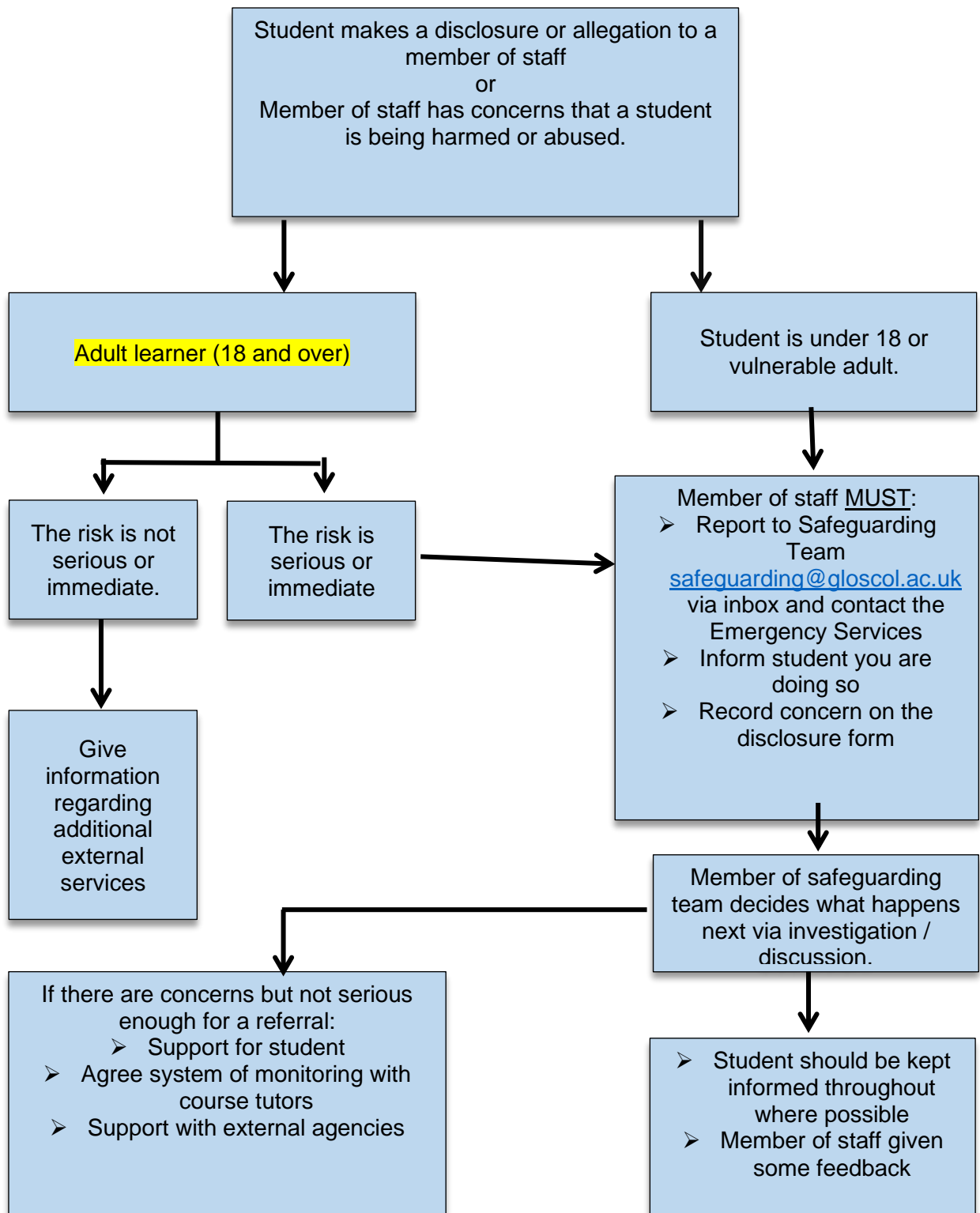
The College will reflect on reported concerns, including the decisions made and actions taken, in order to identify any patterns of concerning, problematic or inappropriate behaviour which may indicate an unacceptable culture, or any weaknesses in the College's safeguarding system which may require additional training or amendments to relevant policies. Where a pattern is identified the College will decide on an appropriate course of action.

In the event that a report is proven to be false, unsubstantiated, unfounded or malicious, the DSL will consider whether the student and/or the person who has made the allegation is in need of help or may have been abused by someone else and this is a cry for help. In such circumstances, a referral to children's social care may be appropriate. If a report is shown to be deliberately invented or malicious, the Principal will consider whether any disciplinary action is appropriate against the individual who made it in accordance with the College's behaviour policy.

# Safeguarding

## Flowchart for Staff and Volunteers

What to do if you are concerned that a student is at risk



## Keeping Children Safe in Education

[Further Information available at this link here](#)

The document can also be found in the Policies SharePoint site on O365  
- click on the "Governance" tile.

**This link provides staff that directly work with children or young people with Part 1 and Annex B of Keeping Children Safe in Education 2023 which must be read and understood.**

**Staff who do not work directly with children or young people must read and understand as a minimum Part 1 and Annex A of Keeping Children Safe in Education 2023.**

**Training and support are available to staff on any element in this document.**

### **Reporting and dealing with allegations or concerns about members of staff including supply staff and other staff (including the Principal, Governors, volunteers and contractors)**

The College procedures comply with Department of Education statutory guidance contained within *Working Together to Safeguard Children* (DfE) 2018, KCSIE 2023 and the Gloucestershire Safeguarding Children Executive procedure for Allegations against Staff, Carers or Volunteers and applies to a wide range of allegations that might indicate that a person is unsuitable to continue to work with children, young people or vulnerable adults in their present position, or in any capacity. It will be used in respect of all cases in which it is alleged that a person who works with children or young people (including volunteers) has:

- behaved in a way that has harmed, or may have harmed, a child or young person;
- possibly committed a criminal offence against or related to a child or young person;
- behaved toward a child/young person or children/young people in a way that indicates they may pose a risk of harm if they were to work regularly or closely with children or young people; or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children or young people, including behaviour that may have happened outside of college.

Allegations that do not meet the above harms test should be dealt with using the College's procedure for handling low level concerns set out below.

It is essential that any allegation of abuse made against any member of staff is dealt with fairly, with common sense and judgment, as quickly as possible and consistently, in a way that provides effective protection for the student and at the same time supports the person who is the subject of the allegation.

In rare instances staff within education institutions have been found responsible for abuse. Because of their frequent contact with children and young people, staff may have false/malicious allegations of abuse made against them. The College recognises that an allegation of abuse made against a member of staff may be made for a variety of reasons and that the facts of the allegation may or may not be true. It is imperative that those dealing with an allegation maintain an open mind and that investigations are thorough and not subject to delay.

The Children Act 1989 states that the welfare of the child or young person is the paramount concern. It is also recognised that hasty or ill-informed decisions in connection with a member of staff can irreparably damage an individual's reputation, confidence and career. Therefore, those dealing with such allegations within the College will do so with sensitivity and will act in a careful, measured way.

#### **Low Level Concerns**

A low-level concern is any concern that an adult working in or on behalf of the College may have acted in a way that:

- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work; and
- does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.

The term low level concern does not mean that it is insignificant, it means that the behaviour towards a child or young person does not meet the threshold of serious harm but does cause a sense of unease or a "nagging doubt" that a member of staff is not acting in a way that is consistent with code of conduct, including outside of work. Such behaviour can exist on a wide spectrum, from the inadvertent or

thoughtless, or behaviour that may look to be inappropriate, but might not be in specific circumstances, through to that which is ultimately intended to enable abuse (for example, grooming-type behaviours). Examples of such behaviour can include, but is not limited to:

- Being over friendly with children or young people;
- Having favourites;
- Taking photographs of children or young people on their mobile phone;
- Engaging with a child or young people on a one-to-one basis in a secluded area or behind a closed door; or
- Using inappropriate sexualised, intimidating or offensive language.

The College takes all concerns about safeguarding seriously and recognises that addressing even low-level concerns is important to create and embed a culture of openness, trust and transparency in which the College's values and expected behaviour of its staff are constantly lived, monitored and reinforced by all staff.

All staff are able to share low level concern about their own or another member of staff's behaviour and this will be reviewed by HR Director and DSL and addressed appropriately.

The College's Code of Conduct is in place to provide clear guidance about the standards of appropriate behaviour and actions of its staff so as to not place students or staff at risk of harm or of allegation of harm to a student. All staff are expected to comply with the standards contained within the Code of Conduct.

Staff must share all concerns with the Principal without delay so that it can be recorded and dealt with appropriately, sensitively, and proportionately and in a timely manner. The Principal is the ultimate decision-maker in respect of all low-level concerns. The DSL and the Human Resource Managers have operational responsibility for the management of allegations or concerns. They are responsible for liaising with the LADO or, where the student may be a Vulnerable Adult, the Gloucestershire Adult Protection Co-ordinator. Where a low-level concern is raised about the Principal, it should be shared with the Chair of Governors.

Staff are also encouraged to self-refer in the event that they have found themselves in a situation which may be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in a way that may be considered to fall below the expected professional standard. All concerns will be handled sensitively and will be dealt with appropriately and proportionately.

If a concern is raised by a third party, the Principal will collect as much evidence as possible by speaking to the person who has raised the concern (if known), to the individual involved and any witnesses. The concern will be recorded in accordance with this policy, in the usual way.

The College will address unprofessional behaviour at an early stage and will support the individual to correct it.

All low-level concerns will be recorded in writing. The record will include details of the concern, the context within which the concern arose, and details of the action taken. The name of the reporting individual should also be included, unless they have asked to remain anonymous, which will be respected as far as reasonably possible. The records will be kept confidential, will be held securely and in compliance with the Data Protection Act 2018 and the UK GDPR at all times.

Low-level concerns will not be included in references unless they relate to issues which would normally be disclosed, for example, misconduct or poor performance.

The College will also reflect on reported concerns in order to identify any patterns of concerning, problematic or inappropriate behaviour which may indicate an unacceptable culture, or any weaknesses in the College's safeguarding system which may require additional training or modified policies. Where a pattern is identified, the College will decide on a course of action, either through its disciplinary procedures, or, where the pattern moved from a concern to meeting the harms threshold, it will follow the above procedure and refer the matter to the LADO.

Where a low-level concern relates to a person employed by a supply agency or a contractor, the individual's employer will be notified about the concern, so that any potential patterns of inappropriate behaviour can be identified.

If the College is in any doubt as to whether a low-level concern in fact meets the harm threshold, the DSL and Principal will consult with the LADO and take a more collaborative decision-making approach.

## **Enquiries and Investigations**

Child or adult protection enquiries by Social Care or the police are not to be confused with internal disciplinary enquiries by the College. The College may be able to use the outcome of external agency enquiries as part of its own procedures. The Child and Adult Protection agencies, including the Police, have no power to direct the College to act in a particular way in respect of the management of staff. However, the College is obliged to assist the agencies with their enquiries.

Allegations against a teacher who is no longer teaching should be referred to the Police. Historical (non-recent) allegations of abuse should be referred to the Police and also the LADO. Non-recent allegations made by a child or young person will be reported to the LADO in line with the local authority's procedures for dealing with non-recent allegations. The LADO will coordinate with children social care and the Police.

If an allegation is made against anyone working with children or young people in the College, before contacting the LADO, the College will conduct a basic enquiry in line with local procedures to establish the facts in order to determine whether there appears to be any foundation to the allegation. The College will hold in abeyance its internal enquiries while the formal Police or Social Care investigations proceed; to do otherwise may prejudice the investigation. Any internal enquiries shall adhere to the existing staff disciplinary procedures. In borderline cases, the College may discuss the matter informally with the LADO on a no-names basis before commencing any investigation.

If there is an investigation by an external agency, for example the Police, the Case Manager (i.e. the Principal) should normally be involved in, and contribute to, the inter-agency strategy discussions which are facilitated by the Local Authority Designated Lead/APC. If the College has questions about any police investigation, it will ask the Police.

The Case Manager is responsible for ensuring that the College gives every assistance with the agency's enquiries. S/he will ensure that appropriate confidentiality is maintained in connection with the enquiries, in the interests of the member of staff about whom the allegation is made, and of the child or young person making the allegation.

## **Reporting procedure**

All allegations which appear to meet the above reporting criteria are to be reported straight away to the DSL. If an allegation is reported to the DSL, the DSL will contact the Case Manager immediately. The DSL will provide the Case Manager with written details of the allegation that include information about times, dates, location, and names of potential witnesses. The written details will be signed and dated by the member of staff who received the allegation and countersigned by the DSL.

Where the DSL is absent or is the subject of the allegation or concern, reports should be made directly to the Case Manager (i.e. the Principal). The DSL must not be informed of the allegation prior to contact with the Case Manager.

Equally, where the Case Manager is the subject of the allegation or concern, reports should be made directly to the Senior Nominated Person (i.e. Mary James) who will liaise with the LADO. In these circumstances, the Case Manager should not be informed of the allegation prior to contact with the

Senior Nominated Person. However, staff may consider discussing any concerns with the DSL and make any referral via them.

The Case Manager should immediately discuss the allegation with the LADO and consider the nature, content and context of the allegation and agree a course of action including any involvement of the Police. (Where the Case Manager deems there to be an immediate risk to children/young people or there is evidence of a possible criminal offence, or it is an emergency situation the Case Manager may involve the Police immediately.) All discussions should be recorded in writing, and any communication with both the individual and the parents of the child(ren) or young person/people agreed. The LADO should be informed within one working day of all allegations that come to the College's attention and appear to meet the criteria or that are made directly to the Police and/or children's social care. The Case Manager is responsible for ensuring the child or young person is not at risk.

Where the Case Manager is concerned about the welfare of other children or young people in the community, or the member of staff's family, they will discuss these concerns with the LADO and make a risk assessment of the situation. It may be necessary for the LADO to make a referral to children's social care.

The Case Manager will ensure that the individual who is the subject of the allegation is informed as soon as is appropriate, having received guidance from the LADO and, if appropriate, the Police and/or children's social care. The individual will be given an explanation of the likely course or action, unless there is an objection by the LADO, children's social care or the Police. The Case Manager will appoint a named representative to keep the individual informed of the progress of the case and will consider what other support is appropriate for the individual.

The Case Manager will ensure that parents are informed as soon as possible and kept informed about progress of the case, subject to any advice from the LADO, children's social care or the Police. Parents and others will be made aware that there are restrictions on publishing information which may lead to the identification of the teacher subject to the allegation.

Where further enquiries are required to enable a decision about how to proceed, the LADO and Case Manager should discuss how and by whom the investigation will be undertaken. The LADO will provide advice and guidance to the College to ensure that an appropriate investigation is carried out. In straightforward cases, the investigation should usually be undertaken by a senior member of staff at the College. Where there is lack of resource, or the nature or complexity of the allegation requires it, an independent investigator may be appointed to undertake the investigation.

The Case Manager will monitor the progress of cases to ensure they are dealt with as quickly as possible in a thorough and fair process. Reviews are conducted at fortnightly or monthly intervals, depending on the complexity of the case. The first review will take place no later than four weeks after the initial assessment and subsequent review dates will be set at the review meeting.

## **Suspension of Staff**

Suspension will not be automatic and should be considered only in cases where there is cause to suspect a student or other student at the College is/are at risk of harm, or the case is so serious that it might be grounds for dismissal. Suspension may be considered at any stage of the investigation, and the Case Manager should give careful consideration as to whether the circumstances of the case warrant suspension or whether alternative arrangements should be put in place until the allegation is resolved. It is a neutral not a disciplinary act and shall be on full pay. The following alternative arrangements should be considered by the case manager before suspending a member of staff:

- redeployment within the College so that the individual does not have direct contact with the child/young person or children/young people concerned;
- providing an assistant to be present when the individual has contact with children or young people;



- redeploying to alternative work in the College so the individual does not have unsupervised access to children or young people;
- moving the child/ young person or children/ young people to classes where they will not come into contact with the member of staff, but this decision should only be made if it is in the best interest of the child/ young person or children/ young people concerned and takes accounts of their views. It should be made making it clear that this is not a punishment and parents have been consulted; or,
- temporarily redeploying the member of staff to another role in a different location, for example to an alternative college where available.

These alternatives allow time for an informed decision regarding the suspension, this will, however, depend upon the nature of the allegation.

The suspension procedure as detailed in the disciplinary policy will be observed, and the Case Manager will give due weight to the views of the LADO, WT and KCSIE when making a decision about suspension (including with respect to considering alternatives). The Case Manager will also record the rationale and justification for the suspension, including what alternatives were considered and why they were rejected.

Where the individual is suspended, the Case Manager will ensure they know who their point of contact is in the College and shall provide them with their contact details.

The student or students making the allegation and/or their parents/carers will be informed of the outcome of the investigation and proceedings. This will occur prior to the return to College of the member of staff (if suspended).

## Outcomes

The following definitions should be used when determining the outcome of allegation investigations.

- **Substantiated:** there is sufficient evidence to prove the allegation.
- **Malicious:** there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive or cause harm to the person subject to the allegation.
- **False:** there is sufficient evidence to disprove the allegation.
- **Unsubstantiated:** there is insufficient evidence to either prove or disprove the allegation. The term, therefore, does not imply guilt or innocence.
- **Unfounded:** to reflect cases where there is no evidence or proper basis which supports the allegation being made.

The Case Manager will discuss with the LADO whether a referral to the Disclosure and Barring Service (DBS) or Teaching Regulation Agency should be made where an allegation is substantiated and the person is dismissed or the College ceases to use their services, or the person resigns or otherwise ceases to provide their services. The College has a legal obligation to report promptly to the DBS any person (whether employed, contracted, a volunteer or a student) who has harmed, or poses a risk of harm, to a child or young person, or if there is reason to believe the member of staff has committed one of a number of listed offences, and who has been removed from working (paid or unpaid) in regulated activity, or would have been removed had they not left.

Where an individual is removed from regulated activity, or would have been removed had the individual not left, including when they are suspended, redeployed to work that is not regulated activity, are dismissed, or have resigned, and the individual has engaged in relevant conduct in relation to children/young people and/or adults, and/or satisfied the harm test in relation to

children/young people and/or vulnerable adults, and/or been cautioned or convicted of a relevant (automatic barring either with or without the right to make representations) offence, the College will make a referral to the DBS.

Further, or in the alternative, if an investigation leads to the dismissal or resignation prior to dismissal of a member of teaching staff specifically, the College must consider making a referral to the Teaching Regulation Agency and a prohibition order may be appropriate (because that teacher has displayed unacceptable professional conduct, conduct that may bring the profession into disrepute or a conviction at any time for a relevant offence).

Where initial discussions lead to no further action, the Case Manager and the LADO should record the decision and justification for it and agree on what information should be put in writing to the individual concerned, and by whom.

### **Supply teachers and contracted staff**

The College's procedures for managing allegations against staff above also apply to staff not directly employed by the College, for example, supply teachers provided by an employment agency or business ('the agency'). The College will usually take the lead but agencies should be fully involved (because they have their own policies and procedures) and co-operate with any enquiries from the LADO, police and/or children's social care.

In no circumstances will the College decide to cease to use a supply teacher due to safeguarding concerns, without finding out the facts and liaising with the LADO to determine a suitable outcome. The College will discuss with the agency (or agencies where the supply teacher is working across a number of colleges) whether it is appropriate to suspend the supply teacher, or redeploy them to another part of the College, whilst they carry out their investigation.

The College will advise supply teachers being investigated to contact their trade union representative if they have one, or a colleague for support. The allegations management meeting which is often arranged by the LADO should address issues such as information sharing, to ensure that any previous concerns or allegations known to the agency are taken into account by the College during the investigation.

When using an agency, the College should inform the agency of its process for managing allegations but also take account of the agency's policies and their duty to refer to the DBS as personnel suppliers. This should include inviting the agency's human resource manager or equivalent to meetings and keeping them up to date with information about its policies.

Where the agency dismisses or ceases to use the services of a teacher because of serious misconduct, or might have dismissed them or ceased to use their services had they not left the College first, the College must consider whether to refer the case to the Secretary of State (via the Teaching Regulation Agency).

### **Records**

Records shall be retained in a secure place, together with a written record of the outcome.

The LADO/APC will be informed of the progress and outcomes of management investigations and disciplinary processes.

If a potential outcome of an allegation and subsequent investigation is referral to a regulatory body (e.g. the Teaching Regulation Agency) and/or referral to the ISA, this will be discussed with the LADO/APC.

Allegations found to be malicious or false will be removed from the individual's personnel records unless the individual gives consent for retention of the information. In all other circumstances a written record will be made of the decision and retained on the individual's personnel file in accordance with KCSIE and a copy will only be provided to the individual concerned. The information to be kept on file includes a clear and comprehensive summary of the allegation, details of how the allegation was followed up and resolved, a note of any action taken, decisions reached and the outcomes, and a declaration on

whether the information will be referred to in any future reference (see below). The College has an obligation to preserve records which contain information about allegations of sexual abuse for the duration of the inquiry in accordance with the guidelines of the Independent Inquiry into Child Sexual Abuse ("IICSA"). All other records should be retained until the accused has reached pension age, or for a period of 10 years from the date of the allegation, whichever is longer.

## **References**

Allegations proven to be false, unsubstantiated, unfounded or malicious will not be included in employer references. If an allegation is shown to be deliberately invented or malicious, the Principal will consider whether the student and/or the person who has made the allegation is in need of help or may have been abused by someone else and this is a cry for help. In such circumstances, a referral to children's social care may be appropriate. If a report is shown to be deliberately invented or malicious, the Principal will consider whether any disciplinary action is appropriate against a student who made it in accordance with the College's behaviour policy; or whether the Police should be asked to consider if action might be appropriate against the person responsible even if they are not a student.

## **Monitoring Effectiveness**

Where an allegation has been made against a member of staff or volunteer the nominated Governor, DSL and Case Manager will, at the conclusion of the investigation and any disciplinary procedures, consider whether there are any matters arising from it that could lead to the improvement of the College's procedures and/or policies and/or which should be drawn to the attention of the Gloucestershire Children's Safeguarding Executive. Consideration will also be given to the training needs of staff.

## Signs and types of abuse

All College staff should be aware that abuse, neglect and safeguarding issues are rarely standalone events and cannot be covered by one definition or one label alone. In most cases, multiple issues will overlap with one another therefore staff should always be vigilant and always raise any concerns with the DSL (or DDSL).

Guidance leaflets regarding some common safeguarding concerns can be found on the safeguarding section of the College website (<http://www.gloscol.ac.uk/student-and-parent-guide/safeguarding/>).

All staff should be aware that safeguarding incidents and/or behaviours can be associated with factors outside the College and/or can occur between children or young people outside of the College. All staff, but especially the DSL and DDSL, should consider whether children or young people are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children or young people can be vulnerable to multiple harms including (but not limited to) sexual abuse (including harassment and exploitation), domestic abuse in their own intimate relationships (teenage relationship abuse), criminal exploitation, serious youth violence, county lines and radicalisation.

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

**In all cases, if staff are unsure, they should always speak to the DSL (or DDSL).**

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

**Emotional abuse:** the persistent emotional maltreatment of a child or young person such as to cause severe and adverse effects on the child or young person's emotional development. It may involve conveying to a child or young person 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 or young person 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 or young people. These may include interactions that are beyond a child or young person's developmental capability as well as overprotection and limitation of exploration and learning, or preventing the child or young person 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 or young people frequently to feel frightened or in danger, or the exploitation or corruption of children or young people. Some level of emotional abuse is involved in all types of maltreatment of a child or young person, although it may occur alone.

**Sexual abuse:** involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving violence, whether or not the child or young person 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 or young people in looking at, or in the production of, sexual images, watching sexual activities, encouraging children or young people to behave in sexually inappropriate ways, or grooming a child or young person 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 or young people. Sexual abuse also includes sexual

violence and sexual harassment (see below) which can occur between two children or young people of any sex (also known as child on child abuse). They can also occur through a group of children or young people sexually assaulting or sexually harassing a single child/young person or group of children/young people. Sexual violence are sexual offences under the Sexual Offences Act 2003, such as rape, sexual assault and assault by penetration. Colleges should be aware that sexual assault covers a very wide range of behaviour so a single act of kissing someone without consent or touching someone's bottom/breasts/genitalia without consent, can still constitute sexual assault.

**Sexual harassment** is 'unwanted conduct of a sexual nature' that can occur online and offline and both inside and outside of college. Sexual harassment is likely to violate a child or young person's dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment. Sexual harassment can include sexual comments, such as telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names; sexual "jokes" or taunting; physical behaviour, such as deliberately brushing against someone, interfering with someone's clothes, or upskirting and sharing unwanted explicit content (for example displaying pictures, photos or drawings of a sexual nature); and online sexual harassment, which might include consensual or non-consensual sharing of sexual images and videos (often referred to as the sharing of nudes/semi-nudes, or sexting – see below); inappropriate sexual comments on social media; exploitation; coercion and threats. Online sexual harassment may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence. Further information can be found in the *SVSH* advice.

**Sexual violence:** refers to sexual offences under the Sexual Offences Act 2003, including rape, assault by penetration, sexual assault, and/or causing someone to engage in sexual activity without consent. Consent to sexual activity may be given to one sort of sexual activity, but not another, or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity and each time activity occurs. A child under the age of 13 can never consent to any sexual activity. The age of consent is 16, and sexual intercourse without consent is rape.

**Child-on-child sexual violence and/or harassment:** Sexual violence and sexual harassment (as defined above) can occur between two children or young people of any age and sex, from primary through to secondary stage and into colleges. It can occur through a group of children/young people sexually assaulting or sexually harassing a single child/young person or group of children/young people. It is more likely that girls will be the victims of sexual violence and harassment, and it is more likely that it will be perpetrated by boys. It can however occur between children or young people of any sex. Sexual violence and sexual harassment exist on a continuum and may overlap; they can occur online and face to face (both physically and verbally) and are never acceptable. Children or young people who are victims of sexual violence and/or sexual harassment wherever it happens, will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school or college. **Further information can be found in the *SVSH* advice.**

**Harmful sexual behaviour:** problematic, abusive and violent sexual behaviour is developmentally inappropriate and may cause developmental damage. A useful umbrella term is "harmful sexual behaviour". Harmful sexual behaviour can occur online and/or face-to-face and can also occur simultaneously between the two. Sexual behaviour between children can be considered harmful if one of the children is much older, particularly if there is more than two years' age difference, or if one of the children is pre-pubescent and the other is not. However, a younger child can abuse an older child, particularly if they have power over them, for example, if the older child is disabled or smaller in stature.

**Sharing of nudes and/or semi-nudes:** the sending or posting of nude or semi-nude images, videos, or live streams online by young people under the age of 18. This could be via social media, gaming platforms, chat apps or forums. It could also involve sharing between devices via services like Apple's AirDrop which works offline. The sharing of nudes and semi-nudes can happen publicly online, in 1:1 messaging or via group chats and closed social media accounts and may include images or footage of more than one child or young person.

Alternative terms used by children and young people may include 'dick pics' or 'pics' or may be referred to by adults or professionals as 'youth produced/involved sexual imagery', 'indecent imagery', 'image based sexual abuse' or 'sexting'.

The motivations for taking and sharing nude and semi-nude images, videos and live streams are not always sexually or criminally motivated. Such images may be created and shared consensually by young people who are in relationships, as well as between those who are not in a relationship. It is also possible for a young person in a consensual relationship to be coerced into sharing an image with their partner. Incidents may also occur where:

- children and young people find nudes and semi-nudes online and share them claiming to be from a peer
- children and young people digitally manipulate an image of a young person into an existing nude online
- images created or shared are used to abuse peers e.g. by selling images online or obtaining images to share more widely without consent to publicly shame

For this reason, incidents can either be classified as 'aggravated' or 'experimental'. The DDCMS / UKIS guidance "*Sharing nudes and semi-nudes: advice for education settings working with children and young people*" sets out the classification of incidents, and how each should be handled.

**Upskirting:** is now a criminal offence and typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm. Anyone of any sex can be a victim.

**Neglect:** the persistent failure to meet a child or young person's basic physical and/or psychological needs, likely to result in the serious impairment of the child or young person's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child or young person 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 or young person from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate caregivers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child or young person's basic emotional needs.

**Serious violence:** indicators which may signal that children or young people are at risk from, or are involved with serious violent crime include increased absence from College, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children or young people have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation. All staff should be aware of the associated risks which increase the likelihood of involvement in serious violence (for example, being male, frequent absence from college or permanently excluded from college, experienced child maltreatment or having been involved in offending) and understand the measures in place to manage these.

**Specific safeguarding issues:** behaviours linked to drug taking, alcohol abuse, truanting and sexting put children or young people in danger. Safeguarding issues can also manifest themselves via child-on-child abuse, such as bullying (including cyberbullying), gender-based violence/sexual assaults, sexting and upskirting. Safeguarding issues can also be linked to, for example, children missing education; child sexual exploitation; domestic violence; fabricated or induced illness; faith abuse; female genital mutilation; forced marriage; gangs and youth violence; gender-based violence / violence against women and girls; hate; mental health; preventing radicalisation; relationship abuse; sexting; consensual and non-consensual sharing of nudes and semi-nudes; and trafficking.

**Child sexual exploitation (CSE):** CSE is a form of child sexual abuse (see above) which 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 (for example, money, gifts or affection), and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. 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.

It can involve violent, humiliating and degrading sexual assaults. The victim may have been sexually exploited even if the sexual activity appears consensual, e.g. where a child or young person believes they are voluntarily engaging in sexual activity with the person who is exploiting them. Child sexual exploitation does not always involve physical contact and can happen online and through the use of technology. CSE 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) who has been coerced into engaging in sexual activities. Some young people may not realise they are being exploited e.g. they believe they are in a genuine romantic relationship.

CSE can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence.

A significant number of children or young people who are victims of sexual exploitation go missing from home, care and education at some point. Some of the following signs may be indicators of sexual exploitation:

- Children or young people who appear with unexplained gifts or new possessions;
- Children or young people who associate with other young people involved in exploitation;
- Children or young people who have older boyfriends or girlfriends;
- Children or young people who suffer from sexually transmitted infections, become pregnant or display sexual behaviours beyond expected sexual development;
- Children or young people who suffer from changes in emotional well-being;
- Children or young people who misuse drugs and alcohol;
- Children or young people who go missing for periods of time or regularly come home late; and
- Children or young people who regularly miss college or education or do not take part in education.

The DfE has published guidance on this entitled "*Child sexual exploitation: guide for practitioners*" 2017.

CSE may occur alone, or may overlap with CCE, and/or county lines, as well as other forms of abuse.

**Child criminal exploitation (CCE):** CCE is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child or young person into any criminal activity (a) in exchange for something the victim needs or wants (for example, money, gifts or affection), and/or (b) for the financial or other advantage (such as increased status) of the perpetrator or facilitator and/or (c) through violence or the threat of violence. .

CCE can include children or young people being forced to work in cannabis factories, being coerced into moving drugs or money across the country (county lines, see below), forced to shoplift or pickpocket. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others.

Children and young people 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. Children and young people can be exploited by adult males or females, as individuals or in groups. They may also be exploited by other children or young people, who themselves may be experiencing exploitation – where this is the case, their vulnerability as victims is not always recognised by adults and professionals (especially when they are older children). It is important in these circumstances that the child/young person perpetrator is also recognised as a victim.

Like other forms of abuse and exploitation, CCE:

- can affect any child or young person (male or female) under the age of 18 years;
- can affect any vulnerable adult over the age of 18 years;
- can still be exploitation even if the activity appears consensual;
- can involve force and/or enticement-based methods of compliance and is often accompanied by violence or threats of violence;
- does not always involve physical contact, it can occur through the use of technology and online.
- can be perpetrated by individuals or groups, males or females, and young people or adults; and
- is typified by some form of power imbalance in favour of those perpetrating the exploitation. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, cognitive ability, physical strength, status, and access to economic or other resources.

Some of the following can be indicators of CCE:

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

The experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however staff 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.

CCE may occur alone, or may overlap with CSE, and/or county lines, as well as other forms of abuse.

Children and young people who have been exploited will need additional support to help maintain them in education.

**County lines:** County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs, using dedicated mobile phone lines or other form of “deal line”.

This activity can happen locally as well as across the UK - no specified distance of travel is required. Children, young people and vulnerable adults exploited to sell drugs and move and store drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children and young people can be targeted and recruited into county lines in a number of locations including schools (mainstream and special), further and higher educational institutions, pupil referral units, children’s homes and care homes. Children and young people are increasingly being targeted and recruited online using social media. Children and young people can easily become trapped by this type of exploitation as county lines gangs can manufacture drug debts which need to be worked off or threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

A number of the ways of identifying indicators for CSE and CCE as detailed above may be applicable to where children or young people are involved in county lines. Some additional specific indicators that may be present where a child or young person is criminally exploited through involvement in county lines are children and young people who:

- go missing and are subsequently found in areas away from their home;
- that have been the victim or perpetrator of serious violence (e.g. knife crime);



- are involved in receiving requests for drugs via a phone line, moving drugs, handing over and collecting money for drugs;
- are exposed to techniques such as ‘plugging’, where drugs are concealed internally to avoid detection;
- are found in accommodation that they have no connection with, often called a ‘trap house or cuckooing’ or hotel room where there is drug activity;
- owe a ‘debt bond’ to their exploiters;
- have their bank accounts used to facilitate drug dealing?

Further information on the signs of a child or young person’s involvement in county lines is available in guidance published by the Home Office.

**Modern Slavery:** Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs. Further information on the signs that someone may be a victim of modern slavery, the support available to victims and how to refer them to the National Referral Mechanism is available in the statutory guidance "*Modern slavery: how to identify and support victims (May 2022)*"

**Cybercrime:** is criminal activity committed using computers and/or the internet. It is broadly categorised as either ‘cyber-enabled’ (crimes that can happen off-line but are enabled at scale and at speed on-line) or ‘cyber dependent’ (crimes that can be committed only by using a computer). Cyber-dependent crimes include:

- unauthorised access to computers (illegal ‘hacking’), for example accessing a college’s computer network to look for test paper answers or change grades awarded;
- denial of Service (Dos or DDoS) attacks or ‘booting’. These are attempts to make a computer, network, or website unavailable by overwhelming it with internet traffic from multiple sources; and,
- making, supplying, or obtaining malware (malicious software) such as viruses, spyware, ransomware, botnets, and Remote Access Trojans with the intent to commit further offence, including those above.

Children or young people with particular skill and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime.

If there are concerns about a student in this area, the DSL (or the DDSL), should consider referring into the Cyber Choices programme. This is a nationwide police programme supported by the Home Office and led by the National Crime Agency, working with regional and local policing. It aims to intervene where young people are at risk of committing, or being drawn into, low level cyber-dependent offences and divert them to a more positive use of their skills and interests. Cyber Choices does not currently cover ‘cyber-enabled’ crime such as fraud, purchasing of illegal drugs on-line and child sexual abuse and exploitation, nor other areas of concern such as on-line bullying or general on-line safety.

Additional advice can be found at: Cyber Choices, ‘NPCC- When to call the Police’ and National Cyber Security Centre - NCSC.gov.uk

**So called ‘honour based’ violence:** encompasses crimes which have been committed to protect or defend the honour of the family and/or the community, including FGM, forced marriage, and practices such as breast ironing.

Abuse committed in the context of preserving “honour” often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take.

FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. Guidance on the warning signs that FGM may be about to take

place, or may have already taken place, can also be found on pages 38-41 of the Multi-agency statutory guidance on FGM. To give an example of indications that a girl has already been subjected to FGM:

- A student may have difficulty walking, sitting or standing and may even look uncomfortable.
- A student may have frequent urinary, menstrual or stomach problems or spend longer than normal in the bathroom due to difficulties urinating.
- There may be prolonged or repeated absences from College and/or noticeable behaviour changes (e.g. withdrawal or depression) on the student's return.
- A student is reluctant to undergo medical examination.

***If staff have a concern that a student may be at risk of FGM, they should speak to the DSL (or DDSL) who will (where appropriate) activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with Police and Children's Social Care.***

There is a statutory duty on teachers to personally 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. Unless the teacher has a good reason not to, they should still consider and discuss any such case with the DSL and involve children's social care as appropriate. If the teacher is unsure whether this reporting duty applies, they should discuss their concerns with the DSL in accordance with this policy. Where a teacher suspects that a student is at risk (i.e. where the teacher does not discover that an act of FGM appears to have been carried out, either through disclosure by the victim or visual evidence) or it involves a student over 18, teachers should follow the College's local safeguarding procedures.

Further information can be found in the *Multi-agency statutory guidance on female genital mutilation and the FGM resource pack*, particularly section 13.

**Forced marriage:** 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 and young people from forced marriage. There are a range of potential indicators that a child or young person may be at risk of forced marriage, details of which can be found on pages 13-14 of the Multi-agency guidelines: Handling cases of forced marriage. Further information on forced marriage is available in guidance published by the Forced Marriage Unit. College staff can also contact the Forced Marriage Unit if they need advice or information: Contact: 020 7008 0151 or email [fm@fco.gov.uk](mailto:fm@fco.gov.uk).

**Radicalisation:** Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism. 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. It can also call for the death of members of the armed forces, whether in this country or overseas.

There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. It can happen in many different ways and settings. Specific background factors may contribute to vulnerability which are often combined with specific influences such as family, friends or online, and with specific needs for which an extremist or terrorist group may appear to provide an answer. The internet and the use of social media in particular have become major factors in the radicalisation of young people. As with other safeguarding risks, staff should be alert to changes in student's behaviour, which could indicate that they may be in need of help or protection. Staff should use their judgement in identifying students who might be at risk of radicalisation and act proportionately, which may include making a referral to the Channel programme. DSL's and other senior leaders in colleges should familiarise themselves with the Prevent duty guidance: for further education institutions in England and Wales. Staff should contact the DSL or the DDSL, who should be aware of the local procedures in place, before making a Prevent referral.

In the event of a student leaving, the DSL should consider if it would be appropriate to share any information with the new college. For example, information that would allow the new college to continue supporting victims of abuse or those who are currently receiving support through the 'Channel' programme and have that support in place for when the young person arrives at the new College.

**Special educational needs and/or disabilities (SEND), or students with certain health conditions:** Students with SEND or certain health conditions can face additional safeguarding challenges may not outwardly show signs of abuse and/or may have difficulties in communication about abuse, neglect or bullying. These can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child or young person's condition without further exploration;
- the potential for children and young people with SEND or certain health conditions being disproportionately impacted by behaviours such as peer group isolation or bullying (including prejudice-based bullying), without outwardly showing any signs;
- communication barriers and difficulties in managing or reporting these challenges;
- being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in College or the consequences of doing so.

Staff will support such students in expressing any concerns they may have and will be particularly vigilant to any signs or indicators of abuse, discussing this with the DSL as appropriate.

**Lesbian, gay, bi, trans, queer plus ("LGBTQ+"):** The fact that a child or young person may be LGBTQ+ is not in itself an inherent risk factor for harm. Students who are LGBTQ+ can be targeted by their peers. In some cases, a student who is perceived by their peers to be LGBTQ+ (whether they are or not) can be just as vulnerable as those who identify as LGBTQ+. Risks can be compounded where children and young people who are LGBTQ+ lack a trusted adult with whom they can be open. The College endeavours to provide a safe space for LGBTQ+ children and young people to speak out or share their concerns with trusted members of staff.

The College has a LGBTQ+ network and a dedicated email inbox where students can raise any concerns that they may have.

**Domestic abuse:** The Domestic Abuse Act 2021 received Royal Assent on 29 April 2021. The Act introduces the first ever statutory definition of domestic abuse and recognises the impact of domestic abuse on children and young people, as victims in their own right, if they see, hear, or experience the effects of abuse. The statutory definition of domestic abuse, based on the previous cross-government definition, ensures that different types of relationships are captured, including ex-partners and family members. The definition captures a range of different abusive behaviours, including but not limited to, psychological, sexual, physical, emotional, and economic abuse and coercive and controlling behaviour. Both the person who is carrying out the behaviour and the person to whom the behaviour is directed towards must be aged 16 or over and they must be "personally connected" (as defined in section 2 of the 2021 Act).

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 gender, age, ethnicity, socio-economic status, sexuality or background and domestic abuse can take place inside or outside of the home. The government will issue statutory guidance to provide further information for those working with domestic abuse victims and perpetrators, including the impact on children and young people.

All children and young people can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Experiencing domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children and young people. In some cases, a child or young person may blame themselves for the abuse or may have had to leave the family home as a result.

Young people can also experience domestic abuse within their own intimate relationships. This form of child on child abuse is sometimes referred to as 'teenage relationship abuse'. Depending on the age of the young people, this may not be recognised in law under the statutory definition of 'domestic abuse' (if one or both parties are under 16). However, as with any child or young person under 18, where there are concerns about safety or welfare, child safeguarding procedures should be followed and both young victims and young perpetrators should be offered support. The Act's provisions, including the new definition, will be commenced over the coming months.

Domestic Abuse may lead to other safeguarding concerns and should therefore be managed under this policy. College staff can contact Operation Compass on 0204 513 9990 for advice in respect of children and young people who have experienced domestic abuse.

**Homelessness:** Being homeless, or at risk of homelessness presents a real risk to a child or young person's welfare. The College should be aware of potential indicators of homelessness including: household debt, rent arrears, domestic abuse and anti-social behaviour, as well as a family being asked to leave a property. If staff are made aware, or suspect that a student may be at risk of homelessness they should talk to the DSL in the first instance. Whilst referrals to the Local Housing Authority should be progressed as appropriate, and in accordance with local procedures, this does not and should not replace a referral to the LADO where a child or young person has been harmed or is at risk of harm, in accordance with this policy.

**Students who go missing from education:** A student going missing from College is a potential indicator of a range of safeguarding issues including abuse, neglect, sexual abuse, CSE and CCE. It can also be a sign of child criminal exploitation including involvement in county lines. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of FGM, so-called 'honour'-based abuse or risk of forced marriage. Staff must follow the College's procedures for dealing with students who go missing, particularly persistently. The College's procedure for dealing with students who go missing can be found on Sharepoint. All unexplained absences will be followed up in accordance with the Attendance Procedure. The College shall inform the local authority of any student who is going to be added to or deleted from the College's admission register at non-standard transition points in accordance with the requirements of the Education (Student Registration) (England) Regulations 2006 (as amended). This will assist the local authority to:

- a) fulfil its duty to identify children/young people of compulsory school age who are missing from education; and
- b) follow up with any child/young person who might be in danger of not receiving an education and who might be at risk of abuse, neglect or radicalisation.

College attendance registers are carefully monitored to identify any trends. The College will inform the local authority (and the local authority where the student is normally resident) of any student who fails to attend College regularly, or has been absent without the College's permission for a continuous period of 4 weeks or more, at such intervals as are agreed between the College and the local authority.

Action should be taken in accordance with this policy if any absence of a student from the College gives rise to a concern about their welfare. The College's policy supports identification of abuse and provides preventative measures against the risk of the student going missing in the future. This applies when issues are first emerging as well as where students are already known to the local authority children's social care and need a social worker.

**Students and the court system:** Children and young people are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. There are two age appropriate guides to support children aged 5-11 years old and young people aged 12-17 years old available on the gov.uk website.

The guides explain each step of the process and support and special measures that are available. There are diagrams illustrating the courtroom structure and the use of video links is explained.

Making child arrangements via the family courts following separation can be stressful and entrench conflict in families. This can be stressful for children and young people. The Ministry of Justice has launched an online child arrangements information tool with clear and concise information on the dispute resolution service. The College may refer some parents and carers to this service where appropriate.

**Students with family members in prison:** Approximately 200,000 children or young people in England and Wales have a parent sent to prison each year. These children or young people are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. The National Information Centre on Children of Offenders (“NICCO”) provides information designed to support professionals working with offenders and their children, to help mitigate negative consequences for those children or young people.

## Rights of the Young Person

Young people have said that they need:

**VIGILANCE:** to have adults notice when things are troubling them.

**UNDERSTANDING AND ACTION:** to understand what is happening; to be heard and understood; and to have that understanding acted upon.

**STABILITY:** to be able to develop an ongoing stable relationship of trust with those helping them.

**RESPECT:** to be treated with the expectation that they are competent rather than not.

**INFORMATION AND ENGAGEMENT:** to be informed about and involved in procedures, decisions, concerns and plans.

**EXPLANATION:** to be informed of the outcome of assessments and decisions and reasons when their views have not met with a positive response.

**SUPPORT:** to be provided with support in their own right as well as a member of their family.

**ADVOCACY:** to be provided with advocacy to assist them in putting forward their views.

**PROTECTION:** to be protected against all forms of abuse and discrimination and the right to special protection and help if a refugee.

### Useful Contacts

Local Area Designated Officer – Nigel Hatton 01452 426994

Gloucestershire College Safeguarding Team – [safeguarding@gloscol.ac.uk](mailto:safeguarding@gloscol.ac.uk)

Gloucestershire College website: <http://www.gloscol.ac.uk/student-and-parent-guide/safeguarding/>

## KEY EXTERNAL CONTACT DETAILS

<b>Local Authority Designated Officer</b>	Nigel Hatton TEL: 01452 426994 / 425017 / 07783691575 EMAIL: Nigel.Hatten@gloucestershire.gov.uk
<b>Gloucestershire Children's Social Services</b>	TEL: 01452 426565 EMAIL: childrenshelpdesk@gloucestershire.gov.uk OUT OF HOURS EMERGENCY DUTY TEAM TEL: 01452 614194
<b>Gloucestershire Safeguarding Children Executive</b>	TEL: 01452 426565 EMAIL: gscb@gloucestershire.gov.uk
<b>Support and Advice about Extremism</b>	<b>Police</b> HOTLINE NUMBER: 0800 789321 EMERGENCY: 999 NON EMERGENCY NUMBER: 101  <b>Local Authority</b> Eugene Okane EMAIL: Eugene.okane@gloucestershire.gov.uk  <b>Department for Education</b> NON EMERGENCY NUMBER: 020 7340 7264 EMAIL: <a href="mailto:counter.extremism@education.gov.uk">counter.extremism@education.gov.uk</a>
<b>NSPCC Whistleblowing Advice Line</b>	ADDRESS: Weston House 42 Curtain Road London EC2A 3NH TEL: 0800 028 0285 EMAIL: <a href="mailto:help@nspcc.org.uk">help@nspcc.org.uk</a>
<b>NSPCC Report Abuse in Education Advice Line</b>	TEL: 0800 136 663 EMAIL: <a href="mailto:help@nspcc.org.uk">help@nspcc.org.uk</a>
<b>Disclosure and Barring Service</b>	ADDRESS: DBS customer services PO Box 3961 Royal Wootton Bassett SN4 4HF TEL: 03000 200 190 EMAIL: <a href="mailto:customerservices@db.gov.uk">customerservices@db.gov.uk</a>
<b>Teaching Regulation Agency</b>	ADDRESS: Teacher Misconduct Ground Floor South Cheylesmore House 5 Quinton Road Coventry CV1 2WT TEL: 0207 593 5393 EMAIL: <a href="mailto:misconduct.teacher@education.gov.uk">misconduct.teacher@education.gov.uk</a>
<b>OFSTED Safeguarding Children</b>	TEL: 0300 123 4666 (Monday to Friday from 8am to 6pm)

**KEY COLLEGE CONTACT DETAILS**

<b>Governors</b>	<p><b>Chair of Governors</b>                  Will Abbott                  TEL: 01242 532097                  EMAIL: <a href="mailto:justine.cosson@gloscol.ac.uk">justine.cosson@gloscol.ac.uk</a></p> <p><b>Nominated Safeguarding Governor</b>                  Mary James                  TEL: 01242 532097                  EMAIL: <a href="mailto:justine.cosson@gloscol.ac.uk">justine.cosson@gloscol.ac.uk</a></p>
<b>Designated Safeguarding Lead (DSL) and Deputy Designated Safeguarding Lead (DDSL)</b>	<p><b>Main DSL for the College</b>                  David Kettlety                  TEL: 01452 563231                  EMAIL: <a href="mailto:David.kettlety@gloscol.ac.uk">David.kettlety@gloscol.ac.uk</a></p> <p><b>DDSL</b>                  Sandra Tyrrell                  TEL: 01452 563492                  EMAIL: <a href="mailto:Sandra.tyrrell@gloscol.ac.uk">Sandra.tyrrell@gloscol.ac.uk</a></p> <p><b>Safeguarding Officers</b>                  EMAIL: <a href="mailto:safeguarding@gloscol.ac.uk">safeguarding@gloscol.ac.uk</a></p>
<b>Designated Teacher for Looked After Children</b>	<p>David Kettlety                  TEL: 01452 563492                  EMAIL: <a href="mailto:david.kettlety@gloscol.ac.uk">david.kettlety@gloscol.ac.uk</a></p>
<b>Principal</b>	<p>Matthew Burgess                  TEL: 01452 563451                  EMAIL: <a href="mailto:gemma.burgess@gloscol.ac.uk">gemma.burgess@gloscol.ac.uk</a></p>

Approved by: David Kettlety  
 Date for Review: September 2024