

PETER SYMONDS COLLEGE

Safeguarding of Children, Young People And Vulnerable Adults Policy

Date Reviewed by SMT:	19 June 2024
Date Approved by Governors:	8 July 2024
Member of Staff Responsible:	Deputy Principal (Welfare & Progression)
Next Review Date:	September 2025

Child Protection is part of safeguarding and promoting welfare and refers to activities that are undertaken to: protect children and young people from maltreatment; prevent impairment of mental and physical health or development; prevent radicalisation; ensure they grow up in circumstances consistent with the provision of safe and effective care; enable all to have the best outcomes.

The College will work in accordance with guidance set out in DfE documents ['Working Together to Safeguard Children'](#) , ['Keeping Children Safe in Education'](#) , , and ['Meeting Digital and Technology Standards in Schools and Colleges'](#). The College will also adhere to any guidance set out for managing safeguarding in education during a local or national lockdown when appropriate.

This policy outlines the guidance for Peter Symonds College staff in dealing with allegations, suspicions or disclosures of abuse or radicalisation by students. Where the term 'child protection' is used, it includes reference to children, young people and vulnerable adults.

The underlying principles are:

- to support the student and put their interests first.
- to act at all times with the knowledge and consent of the student.
- to maintain the confidentiality of any matter within the context of the protection of children, young people and vulnerable adults (see below).

1. Background Information

Peter Symonds College has a statutory and moral duty to ensure that it functions with a view to safeguarding and promoting the welfare of all those who are students at the College.

The governing body is committed to ensuring that the College:

- provides a safe environment for students to learn in
- provides opportunities for students to learn about keeping safe
- identifies children, young people and vulnerable adults who may be in need of extra help or who are suffering, or are likely to suffer, significant harm, and
- takes appropriate action to see that such children, young people and vulnerable adults are kept safe, in partnership with other services as appropriate.

- has appropriate policies and procedures in place in order for appropriate action to be taken in a timely manner to safeguard and promote children's welfare.
- has appropriate filters in place to limit student exposure to online risks and effectively monitors student activity on College IT systems.
- provides relevant training for all staff about child protection and safeguarding including online safety which includes the expectations, applicable roles and responsibilities in relation to filtering and monitoring.
- ensures all staff know how to escalate concerns when identified.

In pursuit of these aims, the governing body will ensure that the College designates an appropriate senior member of staff to take lead responsibility for safeguarding and child protection and approve and annually review policies and procedures with the aim of:

- raising awareness of issues relating to the welfare of students and the promotion of a safe environment for all those learning at the College.
- aiding the identification of students at risk of significant harm or radicalisation and providing procedures for reporting concerns.
- establishing procedures for reporting and dealing with allegations of abuse or radicalisation against members of staff.
- establishing procedures and checks for the safer recruitment of staff.

The governing body will ensure that all governors:

- receive appropriate safeguarding and child protection training at induction that will equip them with the knowledge to be able to test and challenge that the safeguarding policies and procedures in place are effective and support the delivery of a robust whole College approach to safeguarding. This training should be regularly updated.
- are aware of their obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty, and the local multi-agency safeguarding arrangements).

Every member of staff must be aware of their responsibilities for dealing with allegations or suspicions of abuse or radicalisation and must take all allegations or suspicions seriously and respond to them sensitively and put the interests of the student first. Staff members must be aware that they may be asked to support social workers to take decisions about individual students. All staff must also understand their responsibility in regards to online safety.

2. Definitions

- Child abuse is defined as: 'when there is evidence of a cause for concern that a child or young person has suffered from or is at significant risk of, any one or more of the following: neglect, physical abuse, sexual abuse and/or emotional abuse.' See Appendix 1.
- The term 'children and young people' is used to refer to those students who are under the age of eighteen. In addition, this policy applies to students under the age of twenty-five who have learning difficulties and/or disabilities as they are 'vulnerable adults' also in need of protection.
- The term 'member of staff' includes all academic and support staff employed by the College, be they full time, fractional, part time, permanent

or temporary, and volunteers; this also includes those staff employed by contractors.

- 'Radicalisation' refers to the process of a person legitimising support for, or use of, terrorist violence. (DfE Prevent Duty Guidance).

3. Confidentiality

Young people from 16 to 18 have a right to confidentiality, which must be respected. Young people under the age of 16 have similar rights, qualified by their age, understanding and vulnerability (i.e. they are 14 or over and are judged to have the capacity to understand and make their own decisions).

However, in matters concerning the protection of children, young people and vulnerable adults, the law permits the disclosure of confidential information to external agencies, like children's services and the police, necessary to safeguard a child, young person or vulnerable adult. **Therefore, full confidentiality cannot be promised to a student.**

The College will ensure that relevant staff have due regard to the relevant key data protection principles. The UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018 (DPA) **do not** prevent the sharing of information for the purposes of safeguarding children, young people or vulnerable adults, when it is necessary, proportionate and justified to do so. In fact, they provide a framework for information sharing where staff have reason to believe that failure to share information may result in the subject being at risk of harm.

Within College, information about a student in relation to the protection of a child, young person or vulnerable adult should be shared on a 'need to know' basis. Early sharing of information is key to providing effective early help and support where there are emerging problems. At the other end of the continuum, sharing information will be essential to put in place effective child protection support. In most cases, you should be open and honest with students and explain who you intend to share information, what information you will be sharing and why. However, you are not required to inform them if you have reasons to believe that doing so may put them at increased risk of harm.

4. Designated staff with responsibility for the protection of children, young people and vulnerable adults

The designated senior member of staff with lead responsibility for child protection (designated safeguarding lead – DSL) is the deputy principal (welfare and progression) - who is responsible for:

- having lead responsibility for safeguarding and child protection (including online safety and understanding the filtering and monitoring systems and processes in place).
- overseeing the referral of cases of suspected abuse or allegations of abuse or radicalisation.
- providing advice and support to other staff on issues relating to the protection of children, young people and vulnerable adults.
- ensuring proper records of any referral, complaint or concern are kept.

- ensuring that the parents of children and young people within the College are aware of this policy; in the Adult & Higher Education Division the director of adult and higher education will ensure that the parents of young people studying there and the carers of vulnerable adults are aware of this policy.
- overseeing the liaison with external agencies, local schools, employers and training providers over child protection matters for sixth form students; in the Adult & Higher Education Division this responsibility lies with the director of adult and higher education
- ensuring that lesbian, gay, bi, transgender or non-binary students have a trusted member of staff who they can be open with.
- overseeing the liaison with the virtual school head by the College's designated teacher.
- ensuring that staff in the Sixth Form College receive basic training in child protection issues and are aware of the College child protection procedures; in the Adult & Higher Education Division this responsibility lies with the director of adult and higher education.
- keeping up to date with developments in child protection issues and raising awareness of the College's policy and procedures.
- providing an annual report to the governing body of the College setting out how the College has discharged its duties.
- liaising with the director of adult and higher education if a young person under 18 years of age or a vulnerable young adult under 25 years of age studying at the Adult & Higher Education Division is considered to be at risk.
- In line with the Boarding Schools' Association's 'Commitment to Care Charter,' notifying the BSA as soon as it permissible to do so, of any allegation against a member of staff that the College has referred to the LADO and informing the BSA of any allegation of child-on-child abuse in which external authorities have become involved. The head of Boarding may deputise for the deputy principal in this regard.

Designated members of staff with responsibility for child protection and safeguarding, who can deputise for the DSL include:

- The head of Student Services
- The director of adult and higher education
- The senior management team and the directors of curriculum and support
- The head of Study Support
- The head of Boarding
- The deputy head of Student Services

These staff will:

- promptly record information on the College's online safeguarding system including:
 - all disclosures and concerns.
 - discussions and decisions made and the reasons for those decisions.
 - a clear and comprehensive summary of the concern.
 - details of how the concern was followed up and resolved.
 - a note of any action taken, decisions reached and the outcome.
 - details of internal and external meetings.

- attend regular meetings of the safeguarding team with updates on the live cases which they are managing.
- know how to make an appropriate referral and do so where necessary.
- be available to provide advice and support to other staff on issues relating to child protection.
- be available to listen to children, young people and vulnerable adults studying at the College.
- deal with individual cases, including attending case conferences and review meetings and liaising with external agencies as appropriate.
- ensure the student's wishes and feelings are taken into account when determining what action to take and what services to provide.
- contact or refer to Children's Services when appropriate. The contact details for Hampshire Children's Services are: 0300 555 1384 or 0300 555 1373 (out of hours number); or childrens.services@hants.gov.uk ; the contact details for Hampshire Adult Services is: 0300 555 1386.
- be alert to child-on-child abuse and understand that even if reports are not being made to them, it does not mean that this is not happening in College.

The designated governor with responsibility for child protection is responsible for:

- ensuring that the College has policies and procedures in place that are consistent with guidance from the Department for Education and Hampshire Safeguarding Children Partnership.
- ensuring that the governing body considers the College policy on child protection each year.
- ensuring that each year the governing body, via the C&QA sub-committee, is informed of how the College and its staff have complied with the policy and discharged its duties.
- overseeing liaison with the principal and senior staff member with lead responsibility over matters regarding child protection
- overseeing liaison between appropriate agencies in connection with allegations against the principal or senior staff member with lead responsibility. This will not involve undertaking any form of investigation but will ensure good communication between parties and provide information to assist enquiries. To facilitate this, the designated governor and chair of governors will be informed immediately of any allegation against a member of the senior management team.

To assist in these duties, the designated governor will receive appropriate training.

5. Responsibilities of all staff when responding to an allegation, suspicion or disclosure of abuse or neglect *(further guidance is contained within the Staff File on the College Intranet)*

- All staff should be aware of the signs of abuse and neglect, exploitation and radicalisation and are responsible for responding appropriately to a disclosure and must act with the knowledge of the student.
- All staff should reassure those reporting abuse, neglect, exploitation or radicalisation that they are being taken seriously and that they will be

supported . A student should never be given the impression that they are creating a problem by reporting including reporting abuse, sexual violence or sexual harassment. Nor should a student ever be made to feel ashamed for making a report.

- All staff should be aware that some young people may not feel ready or know how to tell someone they are being abused, exploited or neglected and they may not recognise their experience as harmful. This should not prevent staff from having a professional curiosity and speaking to the DSL if they have concerns.
- Staff are required to respond with sensitivity and tact to any student who confides in them, recognising that it requires courage to share such painful and personal concerns.
- Staff members are advised to maintain an attitude of 'it could happen here' where safeguarding is concerned.
- Staff are **not** responsible for the investigation of abuse, neglect or radicalisation and should not attempt to deal with it beyond listening to and supporting the student and then referring the matter immediately to a designated member of staff.
- An immediate record should be kept of the conversation between staff and the student making the disclosure. The record-keeping must comply with the General Data Protection Regulation (GDPR).
- If a student is at immediate risk of harm to themselves, to/from others, this must be reported to a member of the safeguarding team in person and without delay and always on the same day. This should be face to face or by telephone or video call. Staff must do this in addition to completing a written report on the College's confidential records system.
- The designated member(s) of staff, or their deputy, will liaise with children's services and other agencies on behalf of the College.
- All internal communication about the case must be kept to a minimum and on a 'need to know' basis.
- The student will be informed of all actions to be taken where it is practicable and safe to do so.
- Students with specific needs may require a different approach from other young people. Staff must be aware of any special considerations with regard to communication difficulties and matters pertaining to equality, diversity and inclusion.
- If the allegation of abuse is about a member of the College staff (including supply staff and volunteers) this should be reported immediately to the principal.
- If the allegation is about the principal, the allegation should be passed immediately to the chair of governors who will follow the appropriate policies and procedures.
- If the allegation is about another student, the guidance set out in Appendix 5 on child-on-child abuse should be followed.
- If staff have concerns about poor or unsafe practice and potential failures in the College's safeguarding procedures, they should raise these with the senior management team and/or designated governor. The College's whistleblowing procedures can be followed if such concerns are not addressed. The NSPCC operates a whistleblowing advice line: 0800 028 0285 or email help@nspcc.org.uk

6. Early help

Any child or young person may benefit from early help, but all College staff should be particularly alert to the potential need for early help for a student 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, home or boarding
- is persistently absent from College, including persistent absences for part of the College day
- has experienced multiple suspensions / temporary exclusions or is at risk of being permanently excluded
- is misusing drugs or alcohol themselves
- is at risk of modern slavery, trafficking or exploitation
- is at risk of being radicalised or exploited
- has a parent or carer in custody , or is affected by parental offending
- is in a family circumstance presenting challenges for the child, such as drug or alcohol misuse, adult mental health problems or domestic abuse
- is misusing alcohol and other drugs themselves
- has returned home to their family from care
- is at risk from so-called 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage or
- is a privately fostered child.

All staff should also 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 (Keeping Children Safe in Education, DfE).

7. Organisations outside of the College

Where the College is provided with services or activities for students by an organisation separate to the College, the College will seek assurance from the organisation that appropriate safeguarding and child protection policies and procedures are in place. This will also be the case when a separate organisation hires or uses the College premises in order to provide activities for children, regardless of whether or not the children are students of the College. These safeguarding requirements will be included in any lease or hire agreement as a condition of use.

8. Monitoring and review

The governing body will receive an annual report from the designated senior member of staff with lead responsibility for child protection. This report will review

how the College and its staff have complied with the policy and how it has discharged its duties. The governing body will also review this policy each year.

9. Training and staff development

All designated staff will receive training in child protection issues and inter-agency working along with refresher training at least every two years.

Training and briefings will be provided, as appropriate, to all members of staff via the College's normal staff training routes (including the staff induction programme for new staff and scheduled staff training days) to ensure that they are aware of these guidelines, with refresher training at least every three years. The designated members of staff are available to discuss with colleagues any areas/cases that give cause for concern.

10. Other relevant policies and procedures:

The following policies and procedures all form part of the College's overall policy for the protection of children, young people and vulnerable adults:

- Attendance Policy
- Bereavement Policy (Students)
- Child Protection and Abuse Disclosure Guidelines
- Code of Conduct & Abuse of Trust (Practice for All Employees)
- Criminal Convictions & Police Investigations Policy - Students
- Criminal Records & Disclosure Policy (Staff)
- Data Protection Policy
- Drugs and Alcohol Policy & Procedures
- Educational Trips & Visits Policy
- Equality, Diversity and Inclusion Policy for Students
- Fitness to Study Policy
- Guidance on the Use of Reasonable Force & Restraint with Students
- IT- Student Conditions of Use of Peter Symonds College Network
- Personal Care Guidance
- Prevention of Bullying & Harassment (students)
- Prevent Policy and Procedures
- Protocol for Visiting Speakers – Procedure
- Searching Student Possessions and Searching Rooms in Boarding Houses – Guidance
- SEND Policy
- Staff Recruitment Procedures
- Whistleblowing Policy

The College's Equality, Diversity and Inclusion Policy encompasses the nine 'protected characteristics' defined under the 2010 Equality Act.

When this policy was reviewed, consideration was given to equality and diversity in the context of the 2010 Equality Act and any necessary updates agreed.

Appendix 1: Information about different types of child protection issues

Abuse and neglect

Abuse and neglect are forms 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. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on young people of all forms of domestic abuse, including where they see, hear or experience its effects. Children and young people may be abused inside and outside of the College, inside and outside of home and online. They may be abused by adults, children or young people. They may be abused in a family or in an institutional setting by those known to them or by others. Abuse can take place wholly online or technology may be used to facilitate offline abuse.

Children and young people with disabilities and learning difficulties may be particularly vulnerable to abuse.

Furthermore, abuse, neglect and safeguarding issues are rarely stand-alone events and cannot be covered by one definition or one label alone. In most cases, multiple issues are likely to overlap with each other.

Staff should consider whether students may be at risk of abuse or exploitation in situations outside of their families. They may be vulnerable to multiple harms including (but not limited to) sexual abuse, domestic abuse in their own intimate relationships, criminal exploitation, serious youth violence, county lines and radicalisation. They may be further at risk of abuse and other risks online as well as face to face. Children and young people can also abuse other children and young people online through abusive, harassing, misogynistic/misandrist messages, non-consensual sharing of indecent images and the sharing of abusive images and pornography to those who do not want to receive such content.

Physical abuse

Physical abuse is a form of abuse which may involve hitting, shaking, throwing, poisoning, burning, scalding, drowning, suffocating or otherwise causing physical harm to someone. It may be done deliberately or recklessly, or be the result of a deliberate failure to prevent injury occurring. 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.

Neglect

Neglect is the persistent failure to meet a child or young person's basic physical and/or psychological needs, likely to result in serious impairment of their health or development. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Sexual abuse

Sexual abuse involves a child or young person being forced or enticed 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 or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. It may also include non-contact activities, such as involving children and young people in looking at, or in the production of, sexual images, watching sexual activities, encouraging children and young people to behave in sexually inappropriate ways, or grooming a child or young person in preparation for abuse (including via the internet).

Emotional abuse

Emotional abuse occurs where there is 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 and 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 them, which may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning, or preventing the child 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 cyber bullying), causing children and young people frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child or young person, though it may occur alone.

Safeguarding issues

All staff should have an awareness of safeguarding issues that can put children at risk of harm. Behaviour linked to issues such as drug taking and or alcohol misuse, deliberately missing education and consensual and non-consensual sharing of nudes and semi-nudes images and/or videos can be signs that children are at risk.

Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)

Both CSE and CCE are forms of abuse and both occur where an individual or group take advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal activity. Whilst the age of the child may be a contributing factor for an imbalance of power, there are a range of other factors including gender, sexual identity, cognitive ability, learning difficulties, communication ability, physical strength, status and access to economic or other resources.

In some cases, the exploitation or abuse will be in exchange for something the victim needs or wants and/or will be to the financial benefit or other advantage (such as increased status) of the perpetrator or facilitator. The abuse can be perpetrated by individuals or groups, males or females, and children or adults. The abuse can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse.

It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence. CSE and CCE can

affect children, both male and female and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation. Victims can be exploited even when activity appears consensual and it should be noted exploitation as well as being physical can be facilitated and/or take place on line.

CSE occurs where a child or young person is sexually exploited and is a form of child sexual abuse. CSE can affect any child or young person under the age of 18, including 16- and 17-year olds who can legally consent to have sex. It can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity and may occur without the child or young person's immediate knowledge (e.g. through others copying videos or images they have created and posted on social media). Some children may not realise they are being exploited and may believe they are in a genuine romantic relationship.

CCE is where a child or young person is exploited to be involved in criminal activity. CCE can include children being forced to work in cannabis factories, being coerced in to moving drugs or money across the country (county lines), forced to shoplift or pickpocket, commit vehicle crime or to threaten or commit serious violence to others.

County lines

'County lines' is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one or more importing areas [within the UK], using dedicated mobile phone lines or other form of "deal line".

Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to move and store drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Students can be recruited in to county lines in a number of locations including at College, children's homes and care homes. Young people are often used to move drugs and money between locations and are known to be exposed to techniques such as "plugging" where drugs are concealed internally to avoid detection. They are increasingly being targeted and recruited online using social media. Victims can often become trapped as gangs create drug debts and can threaten serious violence to victims (and their families) and kidnap if they attempt to leave the network.

One of the ways to identify involvement is missing episodes from either College or home, when the victim may have been trafficked for the purpose of transporting drugs.

The experience of girls who have been criminally exploited can be very different to that of boys. The indicators may not be the same and it is important to note that both boys and girls being criminally exploited maybe at a higher risk of sexual exploitation.

Cybercrime

Cybercrime is criminal activity committed using computers and/or the internet. 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, a referral into the Cyber Choices programme should be considered. This is a nationwide police programme which aims to intervene and divert young people at risk to a more positive use of their skills and interests.

Domestic abuse

Domestic abuse involves any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass but is not limited to: psychological, physical, sexual, financial and emotional (Domestic Abuse Act 2021). Economic abuse often occurs in the context of intimate partner violence and is any behaviour that has a substantial and adverse effect on someone's ability to acquire, use or maintain money or other property and/or obtain goods or services. Young people can be victims of domestic abuse at home or in their own intimate relationships.

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. Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on young people. In some instances, the young person may blame themselves for the abuse or may have had to leave home as a result.

Financial abuse

Vulnerable adults may separately be at risk of financial abuse (Care Act 2014) which may include having money or other property stolen, being defrauded, being put under pressure in relation to money or other property and/or having money or other property misused.

Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a young person's welfare. Indicators that a family may be at risk include household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave the property.

The Homelessness Reduction Act 2017 places a legal duty on English councils so that everyone who is homeless or at risk of homelessness will have access to meaningful help to help them retain their accommodation or find a new place to live. Concerns about homelessness should therefore be referred to Hampshire County Council's housing department as well as children's services if there is a child protection concern.

Young people who are 16 or 17 years old who are living independently for example through exclusion from their family home or from leaving of their own volition are equally at risk and should be referred to children's services.

So-called 'honour' based abuse

So-called 'honour-based' abuse (HBA) encompasses incidents or crimes that have been committed to protect or defend the honour of the family and/or the

community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing. All forms of HBA are abuse (regardless of the motivation) and should be handled and escalated as such. If in any doubt, staff should speak to the designated safeguarding lead.

Female Genital Mutilation (FGM)

All staff need to be alert to the possibility of a female student being at risk of FGM, or already having suffered FGM. FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences. Victims of FGM are likely to come from a community that is known to practice FGM. Females at risk of FGM may not yet be aware of the practice or that it may be conducted on them, so sensitivity should always be shown when approaching the subject. If in any doubts staff should speak to the designated safeguarding lead.

NB: If any member of staff discovers that an act of FGM appears to have been carried out on a girl under the age of 18, that member of staff MUST personally report this to the police. This is a statutory duty as FGM is illegal in this country.

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 perpetrators use perceived cultural practices as a way to coerce a person into marriage. The age of marriage and civil partnership in England and Wales is 18. If in any doubt staff should speak to the designated safeguarding lead.

Mental health

Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff however, are well placed to observe students day-to-day and identify those whose behaviour suggests they may be experiencing a mental health problem or be at risk of developing one.

Where a student has suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood.

If staff have a mental health concern about a student that is also a safeguarding concern, immediate action should be taken in the same way as with any other child protection concern and speaking to the DSL or a deputy.

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. Concerns should be reported via the National Referral Mechanism.

Children and young people who are absent from College

The College has a clear procedure for the monitoring of attendance and following up absence, as set out in the staff file on the College intranet. It is essential that all staff are aware of potential safeguarding concerns (such as neglect, child sexual and child criminal exploitation – particularly county lines, mental health problems, travelling to conflict zones, Female Genital Mutilation and forced marriage) when students have a period of unauthorised absence. Where students are already known to children's services, absence from College may increase the known safeguarding risks. Tutors are expected to view the weekly attendance report for their tutor group online and liaise with their faculty administrator, senior tutor or director of curriculum and support where they have concerns about absence. If in any doubts, staff should speak to the designated safeguarding lead.

Source: Working Together to Safeguard Children (DFE); What to do if you're worried a child is being abused: advice for practitioners (DFE); Keeping Children Safe in Education (DFE).

Online safety

The risks for young people associated with online safety can be categorized by the four Cs which are content (being exposed to illegal, inappropriate or harmful content), contact (being subjected to harmful online interaction with other users), conduct (online behavior that increases the likelihood of, or causes, harm) and commerce (risks such as online gambling, inappropriate advertising, phishing and or financial scams).

The College filters online content and monitors use of its devices and networks by students and staff in accordance with safeguarding legislation in order to prevent access to inappropriate content and identify risks. Students can also be at risk of harm through the unrestricted access to the internet via mobile phone networks. The College educates its students to access the internet safely and to identify and manage risks appropriately. Students can use this online access to bully, harass or control others including by sharing indecent images. The College reacts robustly to reports of such behaviour and will follow its disciplinary policy and procedures in such cases.

Preventing radicalisation

The Prevent Duty came into effect on 1 July 2015. The Counter-Terrorism and Security Act 2015 requires the College to have due regard to the need to prevent people from being drawn into terrorism. Child protection legislation requires all staff in educational settings to be alert to those who might be susceptible to extremist ideologies.

'Radicalisation' refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.

In respect of safeguarding individuals from radicalisation, the College works to the

Prevent element of the government's counter terrorism strategy (CONTEST) and, where deemed appropriate, seeks external support for learners through referrals to the Channel Programme. This programme aims to work with the individual to address their specific vulnerabilities, prevent them becoming further radicalised and possibly entering the criminal justice system because of their actions.

It is recognised that radicalisation can occur to an individual from any section of society and is not particular to any racial, ethnic or social group. It is further recognised that in many instances the process of radicalisation is essentially one of grooming by others and can occur through many different methods (such as social media or the internet) and settings (such as within the home).

Serious violence

Staff should be aware of the indicators that a young person is at risk of or is 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, or unexplained gifts or new possessions.

There are certain risk factors which increase the likelihood of involvement in serious violence, such as being male, having been frequently absent or permanently excluded from College or a previous school, having experienced child maltreatment and having been involved in offending, such as theft or robbery.

Appendix 2: Procedures for dealing with safeguarding concerns and allegations of abuse against members of Staff (including supply staff, Volunteers and Contractors)

These procedures should be read in conjunction with staff disciplinary procedures and apply to all staff, whether teaching, administrative, management or support, as well as to volunteers. The word "staff" is used for ease of description.

These procedures will also be followed in the case of an allegation being received against a member of staff of a separate organisation which is providing services or activities for students of the College or a separate organisation that is hiring or using the College premises in order to provide activities for children regardless of whether or not the children are students of the College or not.

1. Introduction

- 1.1. The College recognises that an allegation of child 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 those investigations are thorough and not subject to delay.
- 1.2. The College recognises that the welfare of the student 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.
- 1.3. The College encourages the reporting of all concerns about adults working in or on behalf of the College, whether these be allegations that meet the harms threshold or those that may be considered 'low level concerns'.

2. Allegations That May Meet the Harms Threshold

Allegations that meet the harms threshold are those that might indicate a person would pose a risk of harm if they continue to work in their present position, or in any capacity with students in College. These include where the person has:

- behaved in a way that has harmed a child, or may have harmed a child and/or;
- possibly committed a criminal offence against or related to a child and/or;
- behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children; and/or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children.

The last bullet point also includes behaviour that may have happened outside the College, in which case an assessment of transferable risk will be undertaken. If there is any doubt, the LADO will be consulted.

3. Concerns That do not Meet the Harms Threshold / 'Low Level Concerns'

- 3.1 Low level concerns are those of behaviour by an adult working for or on behalf of the College which might be deemed concerning, problematic or inappropriate. Identifying concerns early allows the College to minimise the risk of abuse, and ensure that staff are aware of professional boundaries and act within them. Low level concerns might include:
- being over friendly with students
 - having favourites
 - taking photographs of students on their mobile phone
 - engaging with a student on a one-to-one basis in a secluded area or behind a closed door or
 - using inappropriate sexualised, intimidating or offensive language
- 3.2 Low-level concerns which are shared about supply staff and contractors will be notified to their employers.
- 3.3 If the College is in any doubt as to whether a low-level concern that has been shared in fact meets the harm threshold the LADO will be consulted.

4. Receiving an Allegation from a Student

- 4.1. A member of staff who receives an allegation about another member of staff from a student should follow the guidelines set out in the Staff File, Child Protection & Abuse Disclosure Guidelines
- 4.2. The allegation should be reported immediately to the Principal, unless the Principal is the person against whom the allegation is made, in which case the report should be made to the chair of Governors. The Principal (or chair of governors if the allegation is against the principal) will:
- Obtain written details of the allegation from the person who received it, that are signed and dated. The written details should be countersigned and dated by the Principal (or Chair of Governors).
 - Record information about times, dates, locations and names of potential witnesses.

NB: All allegations about a former employee should be referred directly to the police. Historical allegations of abuse should also be referred to the police.

5. Allegations Against Support Staff

If an allegation is brought against a member of support staff or individual not directly employed by the College, where the disciplinary procedures do not fully apply, for example, supply teachers provided by an employment agency or business, the College will ensure the allegation is dealt with properly.

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 Local Authority Designated Officer (LADO) to determine a suitable outcome.

The College will fully co-operate with any enquiries from the LADO, police or children's services and will attend a management meeting if one is arranged by the LADO. The College will usually take the lead in collecting the facts of the incident, and will take in to account any previous concerns or allegations raised by the LADO in its investigation.

The supply teacher will be advised to contact their trade union representative if they have one or a colleague for support. The teacher's agency will be informed of the College's process for managing allegations and their human resources manager or equivalent will be invited to meetings.

6. Initial Assessment by the Principal (or designated person)

- 6.1. The Principal (or Chair of Governors) will make an initial assessment of the allegation, consulting with the Designated Safeguarding Lead, the Designated Governor, HCC Children's Services and the Hampshire Safeguarding Children Partnership, as appropriate. **Advice should always be sought from the Local Authority Designated Officer (LADO) and where the allegation is considered to be either a potential criminal act or indicates that the student has suffered, is suffering or is likely to suffer significant harm, the matter should be reported immediately to the Police and Children's Services.** It is important that the Principal (or Chair of Governors) does not investigate the allegation. The initial assessment will be on the basis of the information received and is a decision whether or not the allegation warrants further investigation.

If a person in regulated activity has been dismissed or removed due to a safeguarding concern, or would have been had they not resigned, the College will make a referral to the Disclosure and Barring Service (DBS)

- 6.2. Other potential outcomes are:

6.1.1 The allegation represents inappropriate behaviour or poor practice by the member of staff and is neither potentially a crime nor a cause of significant harm to the child, in which case the matter will be addressed in accordance with the College disciplinary procedures.

6.1.2 The allegation can be shown to be false because the facts alleged could not possibly be true.

The Principal will be the ultimate decision maker in respect of all low-level concerns but may choose to consult with the DSL.

7 Enquiries and Investigations

- 7.1 The College will assist external agencies (the police and/or children's services) with their enquiries. The Principal (or Chair of Governors) 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. The Principal (or Chair of Governors) will advise the member of staff that he/she should consult with a representative, for example, a trade union.

- 7.2 The College will hold in abeyance its own internal enquiries while the formal police or children's services investigations proceed; to do otherwise may prejudice the investigation. Any internal enquiries will follow the existing staff disciplinary procedures.
- 7.3 Subject to objections from the police or other investigating agency, the Principal (or Chair of Governors) will:
- 7.3.1 inform the student or parent/carer making the allegation that the investigation is taking place and what the likely process will involve.
 - 7.3.2 ensure that the parent/carer of the student making the allegation has been informed that the allegation has been made and what the likely process will involve.
 - 7.3.3 inform the member of staff against whom the allegation was made of the fact that the investigation is taking place and what the likely process will involve.
 - 7.3.4 inform the Chair of Governors of the allegation and the investigation.
- 7.4 The principal (or Chair of Governors) will keep a written record of the action taken in connection with the allegation.

8 Suspension of Staff

- 8.1 Suspension will not be automatic. In respect of staff other than the Principal, suspension can only be carried out by the Principal. In respect of the Principal, suspension can only be carried out by the Chair of Governors (or in their absence, the Vice Chair).
- 8.2 Suspension may be considered at any stage of the investigation. It is a neutral, not a disciplinary act and shall be on full pay. Consideration will also be given to alternatives: e.g. paid leave of absence; agreement to refrain from attending work; change of, or withdrawal from, specified duties.
- 8.3 Suspension will only occur for a good reason. For example:
- 8.3.1 where a student is at risk.
 - 8.3.2 where the allegations are potentially sufficiently serious to justify dismissal on the grounds of gross misconduct.
 - 8.3.3 where necessary for the good and efficient conduct of the investigation.
- 8.4 If suspension is being considered, the member of staff will be encouraged to seek advice; for example, from a trade union.
- 8.5 Prior to making the decision to suspend, the Principal (or Chair or deputy Chair of Governors) will interview the member of staff. If the police are engaged in an investigation, the officer in charge of the case may be consulted.
- 8.6 The member of staff will be informed that an allegation has been made and that consideration is being given to suspension. This initial interview is not

a formal disciplinary hearing, but a means for raising a serious matter which may lead to suspension and further investigation.

- 8.7 If the Principal (or Chair or deputy Chair of governors) considers that suspension is necessary, the member of staff will be informed that he/she is suspended from duty. Written confirmation of the suspension, with reasons, will be within two working days.
- 8.8 The suspension will remain under review in accordance with the College disciplinary procedures.

9 The Disciplinary Investigation

- 9.1 The disciplinary investigation will be conducted in accordance with the existing staff disciplinary procedures.
- 9.2 The member of staff will be informed of:
- 9.2.1 the disciplinary charge against him/her.
 - 9.2.2 their entitlement to be accompanied or represented by a trade union representative or friend.
- 9.3 Where the member of staff has been suspended and no disciplinary action is to be taken, the suspension will be lifted immediately and arrangements made for the member of staff to return to work.
- 9.4 The student making the allegation and/or their parent/carer will be informed of the outcome of the investigation and proceedings. This should occur prior to the return to College of the member of staff (if suspended).

10 Allegations without foundation

In consultation with the Designated Safeguarding Lead and/or the Chair of Governors, the Principal will:

- 10.1 inform the member of staff against whom the allegation is made orally and in writing that no further disciplinary or child protection action will be taken. Consideration should be given to offering counselling/support.
- 10.2 inform the parent/carer of the alleged victim that the allegation has been made and of the outcome.
- 10.3 prepare a report outlining the allegation and giving reasons for the conclusion that it had no foundation and confirming that the above action had been taken.

11 Records

- 11.1 Documents relating to an investigation will be retained in a secure place, together with a written record of the outcome and, if disciplinary action is taken, details retained on the member of staff's personal and confidential file.

- 11.2 If a member of staff is dismissed or resigns before the disciplinary process is completed, he/she will be informed about the College's statutory duty to inform the DBS (Disclosure and Barring Service).
- 11.3 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); **False** (there is sufficient evidence to disprove the allegation); **Unsubstantiated** (there is insufficient evidence to either to prove or disprove the allegation. The term, therefore, does not imply guilt or innocence).

12 Monitoring Effectiveness

Where an allegation has been made against a member of staff, the Chair of Governors, together with the Principal and Designated Safeguarding Lead 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. Consideration will also be given to the training needs of staff.

13 Duty of Care

- 11.1 As an Employer, the College recognises its duty of care to their employees and will act to manage and minimise the stress inherent in the allegations process. Individuals will be informed of concerns or allegations as soon as possible and given an explanation of the likely course of action, unless there is an objection by the LADO, Children's Services or the police. The individual will be advised to contact their trade union representative, if they have one, or a colleague for support. They will also be given access to wellbeing support, counselling or medical advice as appropriate.
- 11.2 When an allegation is made, the College will make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered.
- 11.3 Parents/carers of a student involved will be told about the allegation as soon as possible if they do not already know of it. However, where a strategy discussion is required, or the LADO, police or Children's Services need to be involved, the College will not normally do so until those agencies have been consulted and have agreed what information can be disclosed to the parents/carers. Parents/carers will be kept informed about the progress of the case, and told the outcome where there is not a criminal prosecution, including the outcome of any disciplinary process. The deliberations of a disciplinary hearing, and the information taken into account in reaching a decision, will not normally be disclosed, but the parents/carers of the student will be told the outcome in confidence

Appendix 3: Safe practice guidance for the avoidance of allegations against staff

The following guidelines are intended to be a common-sense approach that reduce opportunities for the abuse of children, young people and vulnerable adults and help to protect staff from any false allegation.

Furthermore, these guidelines should be read in conjunction with the staff Code of Conduct and apply to all staff, whether teaching, administrative, management or support, as well as to volunteers. The word "staff" is used for ease of description.

You should:

- Treat all children, young people and vulnerable adults with respect and respect their right to personal privacy
- Avoid private 1 to 1 discussions with students; where they take place they should do so in a room with visual access or an open door, and with the knowledge of another member of staff or as part of your scheduled duties (e.g. 1 to 1 tutorials for a personal tutor). For online 1 to 1 discussions with students, staff should follow the '1-2-1 Online Meetings – Safeguarding Guidance' in the Staff File on the College Intranet.
- Exercise caution when discussing sensitive issues with children, young people and vulnerable adults
- Avoid any inappropriate discussion and insensitive, disparaging or sarcastic comments
- Avoid physical contact with a student; it is unwise to attribute touching to your teaching style
- Challenge unacceptable behaviour and report all allegations or suspicions of abuse
- Keep parents/carers informed of all anticipated activities (e.g. on trips and visits)
- Avoid informal out of college relationships with students (e.g. via social networking sites, texting, email etc.)
- Behave with the knowledge that your voice and/or image may be recorded covertly by a student.

Most importantly, following any incident where you feel that your actions or comments have been misconstrued, you should discuss the matter with your line-manager

You should not:

- Spend excessive time alone with a student, away from others
- Take students alone in a car journey, however short
- Take students to your home in your capacity as a member of staff
- Engage in physical or sexually suggestive games
- Allow or engage in inappropriate touching of any form
- Make over-familiar or sexually suggestive comments, even as a joke
- Enter changing rooms (or bedrooms in the boarding houses) unless there is an emergency
- Let unacceptable comments or behaviour from a student go unchallenged
- Do things of a personal nature that a student can do for themselves
- Take photographs, films or any other image of a student without their permission, except in extra-ordinary circumstances e.g. an incident which might be a disciplinary matter

- Contact students via social media, text messages or email, unless this is directly related to a college matter and using College systems/accounts
- Take or store photographs of students on your personal devices except temporarily for the purposes of uploading to College social media feeds. Photographs should be deleted as soon as possible.

Appendix 4: Safeguarding statement and procedures in view of the Prevent Duty

The Prevent Duty came in to effect on 1 July 2015. The Counter-Terrorism and Security Act 2015 requires the college to have due regard to the need to prevent people from becoming terrorists or supporting terrorism.

'Extremism' is the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces.

'Radicalisation' is the process of a person legitimising support for, or use of, terrorist violence and is very much a safeguarding matter.

Who are we safeguarding?

Everyone. There is no stereotype for people who hold extremist views. People can become susceptible to radicalisation for many reasons, including: low self-esteem; guilt; loss; isolation; fear; anger; family breakdown; peer pressure. These factors will not necessarily drive someone to terrorism, but a sense of injustice (be that on a personal or more far reaching scale) can be exploited by people who have their own agenda.

Signs of radicalisation are difficult to define, but will look a lot like troubling behaviour:

- Emotional – short tempered, withdrawn, outbursts, mood swings, new found arrogance
- Verbal – fixated on a subject, change in language / use of words, inappropriate questions, expressing opinions that are at odds with generally shared values
- Physical – changes in appearance; changes in routine, distancing from family or friends, inappropriate graffiti or doodles, tattoos and symbols, extended use of internet, impact on study, change of dress, change in level of health

What should you do if you believe someone to be at risk of radicalisation?

In essence, follow the now well-established safeguarding procedures for student concerns: listen; observe; record; report on; don't promise confidentiality.

Notice; Check; Share:

- **Notice** any changes in behaviour or appearance
- **Check** out your concerns with someone else who knows the student, but trust your instinct if you are still concerned
- **Share** your concerns with a member of the safeguarding team or member of the Senior Management Team.

What will then happen next?

As with any other safeguarding matter the situation will be explored further, which may include talking with the student and their parents and advice being sought from an external agency. A formal referral may then be made to the police or Children's Services.

If the Multi Agency Safeguarding Hub deem that the level of risk is significant the case may be referred to Channel, a multi-agency support scheme. Channel may decide on a bespoke plan of support for the young person. This might include police officers or members of Children's Services visiting the young person at home and/or at College. They may ask that the College put intervention in place.

Participation in Channel is voluntary and requires consent to be given by the individual (or their parent or guardian in the case of anyone under the age of 18) in advance of support measures being put in place. It is preferable that the individual being referred is aware of the referral and in agreement to receiving support prior to the referral being made. However, this may not always be possible. A referral should always be made where there is a concern around extremism or a risk of radicalisation. In these cases, consent will be sought at an appropriate stage prior to any support being offered.

Concerns about a member of staff:

If your concern is about a member of staff, please speak with a member of the Senior Management Team. The appropriate personnel procedures will then be followed.

The College's full Prevent Policy and Procedures can be found in the Staff File on the College Intranet.

Appendix 5 - Child on Child Abuse

The term 'peer on peer' was first changed to 'child on child' in Keeping Children Safe in Education (DfE 2022). 'Child' is not a word which accurately represents our students or which we use in practice. It is used here to reflect the legislation but it is important to remember that the word 'child' in this context refers to anyone under the age of 18.

All students have a right to attend college and learn in a safe environment. The College aims to minimize the risk of child on child abuse by actively promoting equality and diversity within the College, routes for disclosure by victims and avenues of support in College as well as externally.

In many instances, the conduct of students towards each other will be covered by the Student Code of Conduct and the Disciplinary Policy and Procedures or the College's Policy on Prevention of Bullying and Harassment.

However, all staff should be aware that children can abuse other children (often referred to as child on child abuse). And that it can happen both inside and outside of school or college and online. Staff must be alert to the indicators and signs of child on child abuse, know how to identify it and report any concerns or disclosures immediately to a member of the safeguarding team.

It is important to be aware that even if the member of staff is not aware of any reports of child on child abuse in the College it does not mean it is not happening.

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

- bullying (including cyberbullying, prejudice-based and discriminatory bullying);
- abuse in intimate personal relationships between children;
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse);
- sexual violence, such as rape, assault by penetration and sexual assault; (this may include an online element which facilitates, threatens and/or encourages sexual violence);
- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse;
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party;
- consensual and non-consensual sharing of nudes and semi nudes images and or videos (also known as sexting or youth produced sexual imagery);
- upskirting (a criminal offence), which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm; and initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

Sexual violence and sexual harassment between students

Sexual violence and sexual harassment can occur between two children of any age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.

Sexual violence and sexual harassment exist on a continuum and may overlap; they can occur online and offline (both physically and verbally) and are never acceptable.

Staff should be aware that some groups are potentially more at risk. Evidence shows girls, children with special educational needs and disabilities (SEND) and LGBTQ+ children are at greater risk. It is more likely that girls will be victims and boys' perpetrators, but all child on child abuse is unacceptable and will be taken seriously.

All staff must challenge inappropriate behaviour between children, many of which are listed below, that are actually abusive in nature. Staff should be aware that downplaying certain behaviour, can lead to a culture of unacceptable behaviour, an unsafe environment for children and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it. Staff should understand the importance of:

- challenging inappropriate behaviour
- making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up
- not tolerating or dismissing sexual violence or sexual harassment as "banter", "part of growing up", "just having a laugh" or "boys being boys"; and
- challenging physical behaviour (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts.

Sexual Violence

Sexual violence offences under the Sexual Offences Act 2003 are described as rape, assault by penetration, sexual assault and causing someone to engage in sexual activity without consent.

Consent is about having freedom to choose. Consent to sexual activity may be given to one sort of sexual activity but not another. Consent can be withdrawn at any time during a sexual activity and each time activity occurs. The age of consent is 16. Sexual intercourse without consent is rape.

Sexual Harassment

Sexual harassment can be defined as 'unwanted conduct of a sexual nature and is behaviour that is likely to violate a child's dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment.

Sexual Harassment can include but is not limited to sexual comments, sexual 'jokes' or taunting, physical behaviour such as deliberately brushing against

someone or displaying pictures of a sexual nature, online sexual behaviour including consensual and non-consensual sharing of nudes and semi-nudes, and upskirting.

Systems for Students to Report Abuse

Systems for students to report abuse and seek support are advertised through the tutorial programme, posters around the College site and on the College intranet as well as during whole cohort lectures, induction programmes and parents' evenings.

Students can report to any member of staff with whom they feel comfortable including a teacher, their tutor, Senior Tutor, Director of Curriculum & Support or to any member of the safeguarding team. Student Services is located in the main student common room in the Paul Woodhouse Centre and the Student Services Manager and Deputy Manager are members of the safeguarding team. The Head of Study Support and Head of Boarding are also members of the safeguarding team and students can report via these avenues.

All reports are treated in confidence and taken seriously.

Responding to reports of sexual violence and sexual harassment:

- Students making a report of sexual violence or sexual harassment will be taken seriously, kept safe and be well supported.
- They should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.
- Students will be offered support in reporting sexual violence or harassment to the police should they wish to do so. It will be explained that the law is in place to protect young people rather than to criminalise them.
- A member of staff receiving a disclosure or allegation of sexual violence or harassment must not downplay the behaviour being reported.
- If the report includes an online element, staff will be mindful of the 'Searching, Screening and Confiscation: advice for schools' (DfE) guidance and the College's Guidance on Searching Student Possessions
- Staff taking the report must record the allegation in writing on the College's confidential records system and inform a member of the safeguarding team, making a record as soon as practicably possible, and the same day.
- Staff taking a report will never promise confidentiality.
- Staff must keep in mind that certain students may face additional barriers to telling someone because of their vulnerability, disability, sex, ethnicity, gender identity and/or sexual orientation
- Parents or carers may be informed if the student gives their consent.
- If the student, or another child is at risk of harm, is in immediate danger, or has been harmed, a referral will be made to Children's Services and parents would normally be informed (unless this would put the student at greater risk).
- When an offence has been reported which is particularly serious or suggests the alleged perpetrator is committing serial offences, the College will inform the police via a MASH referral. Victims of sexual violence or harassment should be offered support through the College's Hub or Counselling services, via external agencies such as RASAC or an NHS Sexual Assault

Referral Centre (SARC) and made aware of the NSPCC helpline number 0800 136 663

- Alleged perpetrators should also be offered support through the College's Hub and Counselling services

Risk Assessment:

Following a report of child on child abuse where both the victim and perpetrator are students at the College, the DSL will make an immediate risk and needs assessment on a case-by-case basis.

The Risk Assessment will consider;

- The victim, especially their protection and support.
- The alleged perpetrator, their support needs and any disciplinary action.
- All other students at the College.
- The victim and the alleged perpetrator sharing classes and space at College.
- If the incident has been reported to the police, any restrictions on or advice given to either party by the police

The risk assessment will be recorded and kept under review.

Where there has been other professional intervention and/or other specialist risk assessments, these professional assessments will be used to inform the College's approach to supporting and protecting the students.

Taking Action: the DSL will consider:

- The wishes of the victim and how they wish to proceed
- The nature of the incident, including whether a crime has been committed and the harm caused.
- Any power imbalance between the students.
- Any previous incidents of sexual abuse or any other forms of abuse that might constitute a pattern.
- That sexual violence and harassment can take place within intimate personal relationships between children
- Ongoing risks to the victim, other students, children or staff.
- The potential for intra familial harms and support for siblings
- Other related issues or wider context.

Options: the DSL will manage the report with the following options:

- Managing the situation internally.
- Referring to the Early Help Hub.
- Reporting to the police via a referral to the MASH.
- Sharing information with the police via a Community Partnership Information Sharing Form.

Ongoing Response:

- The DSL will manage each report on a case-by-case basis and will keep the risk assessment under review.
- Where there is a criminal investigation into sexual violence or harassment, the alleged perpetrator should be removed from any classes they share with the victim.

- The DSL will consider where appropriate how best to keep the victim and perpetrator a reasonable distance apart on College premises and on transport, including the use of a suspension pending investigation under the College's Disciplinary Policy.
- Where a criminal investigation into a case of sexual violence leads to a conviction or caution, the College will take suitable action. In all but the most exceptional of circumstances, the rape or assault is likely to constitute a serious breach of discipline and lead to the view that allowing the perpetrator to remain at College would seriously harm the education or welfare of the victim (and potentially other students).
- Where a criminal investigation into sexual harassment leads to a conviction or caution, the College will, if it has not already, consider any suitable sanctions in light of the Student Disciplinary Policy, including consideration of permanent exclusion. Where the perpetrator is going to remain at College, the principle would be to continue keeping the victim and perpetrator in separate classes and continue to consider the most appropriate way to manage potential contact on College premises. The nature of the conviction or caution will be especially important in determining how to proceed in such cases.
- Where a report is determined to be unsubstantiated, unfounded, false 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 Services may be appropriate.
- Where a report is shown to be deliberately invented or malicious, the College will consider whether any disciplinary action is appropriate against the individual who made it as per the Student Code of Conduct

Harmful Sexual Behaviour

Children's sexual behavior exists on a wide continuum, ranging from normal and developmentally acceptable to inappropriate, problematic, abusive and violent. The latter may cause developmental damage and is referred to as HSB. HSB can occur online and/or face to face and can occur simultaneously between the two. Inappropriate sexual behavior can become HSB and therefore early intervention is important. It is also important to consider that a child displaying HSB may have experienced their own abuse and trauma. When considering HSB the age and stages of development of the children are critical factors.

Physical Abuse

While a clear focus of child on child abuse is around sexual abuse and harassment, physical assaults and initiation violence and rituals from students to students can also be abusive.

These are equally not tolerated and, if it is believed that a crime has been committed, will be reported to the police.

The principles from the College's Prevention of Bullying & Harassment Policy as well as the College's Disciplinary Policy and Procedures will be applied in these cases, with recognition that any police investigation will need to take priority.

Appendix 6 – IT Monitoring and Filtering

The College filters online content and monitors use of its devices and networks by students and staff in accordance with safeguarding legislation in order to prevent access to inappropriate content and identify risks.

1.0 Roles & Responsibilities

1.1 Governors

Governors have responsibility for the oversight of the Safeguarding Policy and within that, procedures for monitoring of the use of College networks and devices and filtering of online content by staff and students.

1.2 The Senior Management Team (SMT)

The Senior Management Team has responsibility for:

- Procuring appropriate filtering and monitoring systems
- Documenting decisions as to what content is blocked or allowed, for which members of the College community and why
- Reviewing the effectiveness of monitoring and filtering provision
- Overseeing reports pertaining to monitoring and filtering
- Ensuring that all staff understand their role in relation to monitoring and filtering, are appropriately trained and act on reports and concerns

1.3 The Designated Safeguarding Lead (DSL)

The DSL has lead responsibility for online safety which includes overseeing and acting upon:

- An annual review of monitoring and filtering
- Filtering and monitoring reports
- Safeguarding concerns related to filtering and monitoring
- Checks to filtering and monitoring systems
- Maintaining records of the results of the annual audit
- Safeguarding and child protection matters that are picked up through monitoring

1.4 The Head of IT Services

The Head of IT Services has technical responsibility for:

- Carrying out checks to and upkeep of filtering and monitoring systems
- Liaison with the monitoring and filtering system provider
- Ensuring monitoring and filtering reports are accessible to appropriate staff, in a form that can be easily understood and identify individual users so that concerns can be followed up
- Completing actions following concerns or checks to the system
- Supporting the DSL and SMT in procuring appropriate systems, completing an annual review, identifying and reviewing risk
- Maintaining 'Lanschool' on appropriate College devices to support teachers in monitoring student use
- Reporting any safeguarding concerns to the DSL

1.5 All Staff

All staff are responsible for reporting if they:

- see, suspect, are told or become aware that unacceptable content may be accessible on the College system
- are going to be teaching a topic that will cause alerts to come through on the IT monitoring reports
- know or suspect someone is trying to tamper with the system or there is a failure in the system which allows access to unauthorised parts of the system
- come across restrictions they believe to be blocking legitimate access for educational purposes or that are unreasonably impacting teaching or learning or restricting students from learning how to manage risk for themselves
- find a misspelling or abbreviation which allows access to unacceptable content

2.0 Risk Profile of College Students

The Sixth Form College students are all aged 16-19. The Study Support department supports all students with SEND including those with an EHCP. All students are studying on either Level 2 or Level 3 courses, or a combination of both. The College currently has 35 students receiving support because they have English as an additional language. The College has approximately 70 boarding students who have access to the College system out of core College hours. Different permissions are granted to boarders out of hours which are deemed appropriate for 'social' use. This includes access to auction sites, games, shareware and freeware. Boarders' use of study areas within the boarding houses is physically monitored by boarding staff.

At the College's Adult & Higher Education Division there are 16-19 students as well as adult learners. Adult and 16-19 students have different accounts with different permissions, the 16-18 students having the same more restricted permissions as students at the SFC. There is also a cohort of adult LLDD students with significant learning difficulties. These students are supported by the specialist Study Support team and teachers. There are approximately 100 students who identify as having English as an Additional Language, all of whom are adult learners.

3.0 Monitoring Strategy

The College's monitoring strategy includes:

- 3.1 Network monitoring using log files of internet traffic and web access. Daily reports from the monitoring and filtering system are delivered to the DSL. The Head of IT also receives the reports for 'Weapons', 'Extremism' and 'Hacking' categories. Concerns are followed up by members of the safeguarding team, supported by the Senior Tutors. Actions taken are recorded on the College's child protection files. Where concerns are raised relating to a member of staff, the Director of Curriculum & Support will follow up with the staff member concerned and report back to the DSL. A confidential record of the conversation will be held by the DSL.

- 3.2. Physical monitoring by members of staff. All staff are expected to be vigilant to what students are accessing on College devices during supervised activities.
- 3.3 Live supervision by staff using the LanSchool device Management Software. Lanschool is installed on all College devices in Computer Suites and staff are expected to use this capability during supervised sessions.

4.0 Annual Review of Filtering and Monitoring

A review of filtering and monitoring is conducted on an annual basis by the DSL and Head of IT Services and overseen by the link Governor for Safeguarding. A review will also be undertaken when a new safeguarding risk has been identified, a change in working practice has been introduced for example remote access or BYOD, or when a new technology has been introduced. The outcome of the review is reported to SMT and records kept by the DSL.

- 4.1 The annual review will include:
 - The roles and responsibilities assigned in order to manage College filtering and monitoring systems
 - Current filtering and monitoring provision, any gaps and the specific needs of the students and staff
 - Monitoring strategies employed by the College
 - Filtering of online content for all College devices and users
 - Filtering on College mobile devices
 - Checks to the system being carried out regularly and concerns acted upon
 - Whether the College meets the Broadband Internet Standards
 - Whether the College meets the Cyber Security Standards
- 4.2 The annual review will take in to account:
 - The risk profile of the student body
 - What the filtering system blocks and allows and why
 - External safeguarding concerns
 - Relevant safeguarding reports
 - The digital resilience of students
 - Teaching requirements
 - Specific use of chosen technologies including BYOD
 - Related safeguarding and technology policies
 - Checks that are currently taking place and resulting actions
- 4.3. Outcomes of the annual review. As a result, the annual review may inform:
 - Related safeguarding and technology policies and procedures
 - Roles and responsibilities
 - Training of staff
 - Curriculum & learning opportunities
 - Procurement decisions
 - How often and what is checked
 - Monitoring strategies

Appendix 7 – Supporting Transgender and Non-Binary Students

The College has a statutory duty to safeguard and promote the welfare of all students and will support students who identify as transgender or non-binary in line with that duty whilst abiding by the specific legal duties placed on the College which are framed by a student's biological sex. Under UK law children (anyone under the age of 18) cannot obtain a Gender Recognition Certificate and therefore cannot change their legal sex.

Students can choose to disclose their transgender or non-binary status on application to the College, during the interview and enrolment process or at any time during their time at College. Where a disclosure is received and the student requests action to enable social transition in College, the member of staff should refer the student to the Student Services team who will ensure that the student is aware of all of the support the College can offer as well as the specific situations in which their biological sex will need to be used, and take any appropriate action to adjust College systems. Where the student is not requesting action towards a social transition but wishes to discuss their feelings or seek emotional support, this does not need to be referred to Student Services but can be managed by the member of staff.

Responding to Requests and Engaging Parents

The College will not initiate action towards a student's social transition unless it has been explicitly requested by the student.

Where such a request is received the College will not proceed with any action unless the parents or carers of the student are aware that the social transition has been requested. This avoids a situation in which College systems are altered and staff might unwittingly 'out' a student to their parents for example by using the student's preferred name or pronouns at Parent's Evening. The impact of a disclosure being made in this way can be significant to the parents/carers and to the student and therefore the College will always encourage students to find other ways of discussing their gender status with their parents/carers. Where parents are not aware of the request, the College will not take any action to alter College systems.

Where a student discloses that they intend to or have embarked on a medical transition once they have passed the age of 18, this is deemed to be the student's private medical information. If the student is deemed to be 'Gillick competent' the College will not share this information with parents unless the student is. The only exception to this would be where it is deemed necessary to inform parents/carers in order to safeguard and promote the welfare of the student.

Pronouns & Preferred Names

The College is required by law to record the legal name and biological sex of every student and to report on this to government agencies. The legal name of each student will therefore appear in College returns to the government.

However, a student can choose to indicate on the student record whether they have a preferred name and/or pronouns. These will be visible to staff who access the student's record and staff will be encouraged to use these, although by law it is not possible to compel individuals to do so.

Single Sex Spaces including in Boarding Houses

The College has gender neutral toilets in the Carville building and other toilets around the campus which are designated as facilities that anyone can use.

Where other facilities are designated as single sex i.e. toilets, showers and changing facilities, transgender students and non-binary students are required to use those allocated for their biological sex. If this causes significant distress to a student, the College will work with them to find alternative arrangements where possible.

In allocating sleeping arrangements in boarding houses, a transgender or non-binary student can request to be accommodated either in an area of the boarding house allocated for students of their own biological sex or for students of the opposite biological sex. Where the latter is requested, a risk assessment will be carried out in liaison with the student and their parents/carers. For such a request to be granted the parents/carers of the student must agree to the arrangements and the student will be required to occupy a single en-suite room and not share sleeping or bathroom facilities with a student of the opposite biological sex.

On College residential trips a transgender or non-binary student will be required either to share sleeping accommodation and bathroom facilities with student/s of the same biological sex or to be accommodated in a single en-suite room. Any additional costs incurred by opting for a single en-suite room will be borne by the student and their parents/carers.

Physical Education and Sport

The College provides a wide array of sporting opportunities for all students including competitive and no-competitive activity. Some of these activities are designated as single sex activities whereas others are mixed. For single sex activities, transgender and non-binary students will usually be required to participate in those that are designated for their biological sex. This is to ensure all students can participate in sports safely and to encourage maximum participation. this also ensures fairness of competition.

Where a student requests to participate in non-competitive activities that are intended for the opposite biological sex, the College will consider how safe and how fair it would be to allow mixed-sex participation but also whether it would affect the participation of other students.

For competitive sports the College will follow the guidance of the individual sport's governing body.