Safeguarding, Prevent and Child Protection Policy

Ref No	0011	Version	V3
Dept	Student Services	Last Updated	September 2023
Responsible Manager	Assistant Principal- Student Experience & Safeguarding	Next Review	September 2024
Date Approved	18th September 2023	Category	Public
Where Approved	Leadership Team/ Corporation	Covers	Staff/Students

Contents

Our safeguarding team		
Designated Safeguarding Lead (DSL) and Online Safety Lead	Sarah Jones Assistant Principal – Student Experience & Safeguarding	
Deputy Designated Safeguarding (DDSL) Lead CSE Lead Early Help Lead Designated teacher for looked-after and previously looked after children	Caroline Welson Safeguarding Manager & Deputy Designated Safeguarding Lead	
Safeguarding Officer	Amy Brooks Safeguarding Officer	
Safeguarding Officer	Joanne Kimm Safeguarding Officer	
Safeguarding Officer	Sara Williams Safeguarding Officer	
Director of Vocational	Ash Bowler	

Director of Additional Needs & Inclusion	Tom James	
Student Services Lead	Shaun Bickley	
Progress Coach Creative & Music	Paulette Kupiec	
Work Experience Coordinator	Helen Swinnerton	
Safeguarding & Prevent Governor	Gail Bleasby	

Our safeguarding approach

Intent
Telford College is committed to ensuring we have a contextualised approach to safeguarding that provides a caring, positive, safe and stimulating environment that promotes the social, physical and moral development of all our students. The safety, welfare and protection of all students is paramount. This policy applies to all students and all staff without exception. This policy is also applied to all visitors including Governors and contractors. All staff and stakeholders understand their responsibility and contribution to protecting students and what to do where there are concerns that a student is at risk of, or is experiencing, harm or abuse including online safety, students missing from education, hate crime and child on child abuse, sexual violence and sexual harassment with the acknowledgement that "it does happen here". All staff understand that safeguarding is everyone's responsibility and compliance with this is non-negotiable.

Telford College in Partnership with TWSP Priorities:
Telford and Wrekin Safeguarding Partnership have identified the following as priorities for 2023/24: Early Help, Domestic abuse, neglect, exploitation, child on child abuse, getting help at the right time.

In addition, the Independent Inquiry Telford Child Sexual Exploitation (IITCSE) identified the following recommendations which impact on all schools and colleges in the local area:
- CSE training for staff
- Programme of awareness of CSE for students and parents
- CSE report to local authority detailing students at risk
- Mapping report - mapping 'hotspots' of exploitation
- Liaison between schools and CATE team to identify those at risk of CSE
- Review site security.

Implementation
We will:
- ensure clear procedures for reporting and dealing with allegations of abuse including any allegations of abuse against members of staff and concerns that do not meet the harm threshold (low level concerns)
- provide cross college approach to safeguarding including information about our universal offer in accordance with Telford and Wrekin threshold document
- provide appropriate support to learners who have been abused. For example, offering them the services of a counsellor/mentor and external services where appropriate
- continue with our training schedule to ensure all staff are trained and familiar with the Safeguarding Policy and Procedures
- promote the safe recruitment of staff in compliance with the Disclosure and Barring Service (DBS) regulations, including enhanced DBS checks to ensure staff are not prohibited from teaching as well as obtaining and checking of references and identity checks
- Ensure that the DSL is an integral member of the Leadership Team
- Ensure the curriculum offer includes explicit and embedded Safeguarding & Prevent themes.

Impact

Telford college students are safe, they report feeling safe and they know how to report concerns. Students thrive with the extensive wraparound support on offer by the college and the college's commitment to safeguarding and promoting the welfare of Students. All staff are clear about the college's policies and procedures. Students are confident that any concerns they have will be taken seriously and dealt with swiftly and they have a good awareness of safeguarding risks.

Summary & Aims

We have regard for the statutory guidance from the Department for Education (DfE) issued under Section 175 of the Education Act 2002 (as amended), the Education (Independent School Standards) Regulations 2014, the Non-Maintained Special Schools (England) Regulations 2015 and the Apprenticeships, Skills, Children and Learning Act 2002 (as amended). This policy has been developed in line with legal obligations, including, where applicable, the Human Rights Act 1998, the European Convention on Human Rights, the Domestic Abuse Act 2021, the Children and Social Work Act 2017, the Equality Act 2010 and the Public Sector Equality Duty.

We will adhere to the statutory guidance Working Together to Safeguard Children 2018 and Keeping Children Safe in Education 2023 (KCSIE). We will follow the DfE of What to do if you are Worried a Child is Being Abused - Advice for Practitioners. We recognise the NSPCC website also provides us additional information on abuse and neglect and what to look out for.

All child protection matters will be dealt with in line with the arrangements of Telford and Wrekin Safeguarding Partnership (TWSP) and West Midlands Child Protection and Safeguarding Procedures or, if relevant, the safeguarding partnership area Students reside in, under the care of or with designated responsibility.

This policy replaces the previous policy of September 2022.

We have a duty of care to all students. The safety and protection of all students is of paramount importance to all those involved in education. The aim of this policy is to make all within our setting feel safe, promote their welfare and have clear roles and responsibilities in place for that to happen. We are committed to inter-agency working to keep Students safe. All of our community believe that our setting should provide a caring, positive, safe and stimulating environment, which promotes the social, physical and moral development of the individual student.

The governing body will ensure that **all staff** have read at least part one of KCSIE (or annex A if appropriate) and those working with Students will also read Annex B of KCSIE. All members of the governing body and the Designated Safeguarding Lead (DSL) and their deputies will read all parts of KCSIE, relevant parts of Working Together to Safeguard Children. We will maintain a record of this. We recognise that best practice would be for all staff to be acquainted with all parts of KCSIE. The governing body will ensure that mechanisms are in place to assist staff to understand and discharge their role and responsibilities as set out in Part one (or Annex A if appropriate) of KCSIE.

Our policy and all supplementary policies and procedures are published on our website for all to view.

Part one: Safeguarding information

A student centred and coordinated approach to safeguarding
All those who are part of our college, including our staff are an important part of the wider safeguarding system for our students.

It is **everyone's** responsibility to safeguard and promote the welfare of our students; this includes everyone who comes into contact with students and their families. Everyone will consider, at all times, what is in the best interest for the student and ensure their practice is student centred.

No one will manage concerns about a student in insolation. **Everyone** will identify concerns, share information and take prompt action to help student and families receive the right help at the right time.

For the purpose of this policy, safeguarding and promoting the welfare of students is defined as:
- protecting students from maltreatment;
- preventing impairment of student's mental and physical health or development;
- ensuring that students live in circumstances consistent with the provision of safe and effective care; and
- taking action to enable all students to have the best outcomes.

This policy is in place to safeguards all students however, actions taken will be dependent upon the age of the student. For the purpose of this policy, young people include everyone under the age of 18.

The role of our staff
Our staff will identify concerns early, provide help for students, promote student's welfare and prevent concerns from escalating. They will provide a safe environment in which students can learn.

We are committed to identifying students who may benefit from early help. Early help means providing support as soon as a problem emerges at any point in a student's life.

The DSL/DDSL and Safeguarding Officers role is to advise on safeguarding concerns, support others to carry out their safeguarding duties and liaise with other agencies.

Staff training and induction
All staff will receive an induction, so they are aware of our safeguarding systems. This will include the Safeguarding, Prevent and child protection policy, along with relevant policies and procedures such as our Positive behaviour and Whistleblowing policy.   Safeguarding response to students who are absent from education and role of the DSL and CSE lead (including the identity of the DSL and any deputies). We will provide copies of policies and a copy of Part one (or Annex A, if appropriate) or KCSIE to all staff at induction.

Staff will receive appropriate safeguarding and child protection training (including online safety which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring) at induction. This training will be updated regularly (as a minimum every three years). All staff will also receive at least annual child protection and safeguarding updates (including online safety), to provide them with relevant skills and knowledge to safeguard Student effectively. All staff will receive annual training in child sexual exploitation awareness. We will ensure

staff safeguarding training is integrated, aligned and considered as part of whole college safeguarding approach and wider staff training and curriculum planning.

All staff will be made aware of the following:
- Telford & Wrekin early help process and their role within it;
- the process for making referrals to children's social care and for statutory assessments under the Children Act 1989, especially section 17 (children in need) and section 47 (a child suffering, or likely to suffer, significant harm) and the role they might be expected to play in such assessments;
- what to do if a student tells them he/she is being abused, exploited or neglected;
- how to reassure victims they are being taken seriously and that they will be supported and kept safe;
- that Students may not feel ready or know how to tell someone that they are being abused, exploited or neglected, and/or they may not recognise their experiences as harmful;
- staff should be professionally curious and speak to the DSL or their deputies if they have concerns about a student, and
- staff should build trusted relationships with Students which facilitate communication.

We will encourage staff to consider the TWSP [briefing on professional curiosity](#).

Staff know how to manage the requirement to maintain an appropriate level of confidentiality. This means only involving those who need to be involved, such as the DSL (or DDSL) and children's social care. Staff will never promise a student that they will not tell anyone about a report of any form of abuse, as this may ultimately not be in the best interests of the individual. All staff will reassure victims that they are being taken seriously and that they will be supported and kept safe. A victim will never be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment. Nor will a victim ever be made to feel ashamed for making a report.

Early help
We believe that **any** student may benefit from early help, and we ensure that all staff are alert to the potential need for early help for all students **(*Please see Glossary of Safeguarding*)**

Abuse and neglect
All staff are trained on the indicators of abuse and neglect and understand students can be at risk of harm inside and outside of our college, and inside and outside of the harm and online. Staff will exercise professional curiosity and know what to look out for because this is vital for the early identification of abuse and neglect to identify cases of students who may be in need of help or protection.

We believe that abuse, neglect and safeguarding issues are rarely stand-alone events. All staff, but especially the DSL and deputies will consider whether students are at risk of abuse or exploitation in situations outside their families. Extra-familiar harms take a variety of different forms and student can be vulnerable to multiple harms.

All staff are aware that technology is a significant component in many safeguarding and wellbeing issues. We understand students are at risk of abuse online as well as face-to-face. In many cases, abuse will take place concurrently via both online and offline. Students can also abuse other students online, this can take the form of abusive, 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.

Indicators of abuse and neglect
Abuse is a form of maltreatment of a student. Somebody may abuse or neglect a student 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 Students of all forms of domestic abuse. Students may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Students may be abused by an adult or adults or by another student.

Forms of Abuse (*Please see Glossary of Safeguarding*)
- Physical abuse
- Emotional abuse
- Sexual abuse
- Neglect

Safeguarding issues
All staff are trained on safeguarding issues that can put students at risk of harm.

Child-on-child abuse (In relation to students under the age of 18)

All staff are aware that students can abuse other students. This can happen inside or outside of our setting and online.

All staff will be trained in our policy and procedures with regard to child-on-child abuse and the important role they have to play in preventing it and responding to where they believe a student may be at risk from it.

All staff understand that even if there are no reports in our setting it does not mean it is not happening, it maybe it is just not being reported. If staff have **any** concerns regarding child-on-child abuse, even if there are no reports in our setting, they should still speak to the DSL (or DDSL).

All staff are expected to challenge inappropriate behaviours between peers, many of which are listed below, that are actually abusive in nature. Downplaying certain behaviours, for example dismissing sexual harassment as "just banter", "just having a laugh", "part of growing up" or "boys being boys" can lead to a culture of unacceptable behaviours, an unsafe environment for students and in worst case scenarios a culture that normalises abuse leading to students accepting it as normal and not coming forward to report it.

(For examples of Child-on-Child Abuse please see attached Glossary of Safeguarding)

We will actively seek to raise awareness of and prevent all forms of child-on-child abuse by:
- educating all governors, our senior leadership team, staff, students, and parents about this issue;
- educating students about the nature and prevalence of child-on-child abuse, positive, responsible and safe use of social media, and the unequivocal facts about consent, via the curriculum;
- engaging parents on these issues;
- supporting the on-going welfare of the student body by drawing on multiple resources that prioritise student mental health, and by providing college counselling and therapy to address underlying mental health needs;
- working with governors, senior leadership team, and all staff, students and parents to address equality issues, to promote positive values, and to encourage a culture of tolerance and respect amongst all members of the college community;
- creating conditions in which our students can aspire to, and realise, safe and healthy relationships fostering a whole- college culture;
- responding to cases of child-on-child abuse promptly and appropriately; and
- ensuring that all child-on-child abuse issues are fed back to the DSL and DDSL so that they can spot and address any concerning trends and identify students who may be in need of additional support.

At Telford College we will actively engage with TWSP in relation to child-on-child abuse, and work closely with, for example, children's social care, the police and other education settings. The relationships our setting has built with these partners is essential to ensuring that we are able to prevent, identify early, and appropriately handle cases of child-on-child abuse. The DSL (or DDSL) will regularly review behaviour incident logs (Promonitor) which can help to identify any changes in behaviour and/or concerning patterns or trends at an early stage.

We recognise that any student can be vulnerable to child-on-child abuse due to the strength of peer influence, especially during adolescence, and staff should be alert to signs of such abuse amongst all students. Individual and situational factors can increase a student's vulnerability to abuse by their peers. We know that research suggests:

- child-on-child abuse may affect males differently from females (i.e. that it is more likely that females will be victims and males perpetrators). However, all child-on-child abuse is unacceptable and will be taken seriously;
- students with Special Educational Needs and/or Disabilities (SEND) are three times more likely to be abused than their peers without SEND, and
- some students may be more likely to experience child-on-child abuse than others as a result of certain characteristics such as sexual orientation, ethnicity, race or religious beliefs
- .

Child-on-child sexual violence and sexual harassment (In relation to students under the age of 18)
All those who are part of our community believe that sexual violence and sexual harassment is not acceptable and will not be tolerated.

We understand that sexual violence and sexual harassment can occur between two or more students **of any age and sex.** It can occur online. It can also occur through a group of students sexually assaulting or sexually harassing a single student or group of students. Sexual violence and sexual harassment exist on a continuum and may overlap.

We recognise that students who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, likely, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends our setting.

We will work to ensure our college community are aware of the importance of:
- challenging inappropriate behaviours;
- 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; and,
- challenging physical behaviours (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.

For the purpose of this policy, we use the term 'victim', 'alleged perpetrator(s)' or where appropriate 'perpetrator(s)'. Ultimately, the use of appropriate terminology will be determined, as appropriate, on a case-by-case basis.

Along with providing support to students who are victims of sexual violence or sexual harassment, we will provide the alleged perpetrator(s) with an education, safeguarding support as appropriate and implement any disciplinary sanctions. We recognise that a student abusing another student may be a sign they have been abused themselves or a sign of wider issues that require addressing within the culture of our setting. Taking disciplinary action and providing appropriate support, can, and should, occur at the same time if necessary.

We understand that reports of sexual violence and sexual harassment are extremely complex to manage. We know it is essential that victims are protected, offered appropriate support and every effort is made to ensure their education is not disrupted. We also know it is also important that other students, adult students and our staff are supported and protected as appropriate.

We will try to be aware of, and respond appropriately to **all reports and concerns**, including those outside of our setting, and or online.

Whilst the focus of this policy is on protecting and supporting students, we will of course protect any adult students and engage with adult social care, support services and the police as required.

Sexual violence
Our staff are aware of sexual violence and the fact students can, and sometimes do, abuse their peers in this way both inside and outside of our setting. We refer to sexual violence as sexual offences under the Sexual Offences Act 2003 as listed below:
- Rape
- Assault by Penetration
- Sexual Assault

(For definitions of the above, please see Glossary of Safeguarding)

Consent *(Please see glossary of Safeguarding for definition)*
We believe that **consent** is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another, e.g.to vaginal but not anal sex or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity and each time activity occurs. Someone consents to vaginal, anal or oral penetration only if s/he agrees by choice to that penetration and has the freedom and capacity to make that choice.

Sexual consent
- a young person under the age of 13 can never consent to any sexual activity;
- the age of consent is 16;
- sexual intercourse without consent is rape.

Sexual harassment
When referring to sexual harassment we mean 'unwanted conduct of a sexual nature' that can occur online and offline, both inside and outside of our setting. When we reference sexual harassment, we do so in the context of child-on-child sexual harassment. Sexual harassment is likely to: violate a young person's dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment.
Please see Glossary of Safeguarding examples

We will follow the guidance set out in [UKCIS Sharing nudes and semi-nudes: advice for education settings working with children and young people](#).

Upskirting
The Voyeurism (Offences) Act, which is commonly known as the Upskirting Act, came into force on 12 April 2019. We recognise 'Upskirting' is where someone takes a picture under a person's clothing (not necessarily a skirt) without their permission and or knowledge, 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. It is a criminal offence. Anyone of any sex, can be a victim.

Harmful sexual behaviour
Students's sexual behaviour exists on a wide continuum, from normal and developmentally expected to inappropriate, problematic, abusive and violent. Problematic, abusive and violent sexual behaviour is developmentally inappropriate and may cause developmental damage. We use the term "harmful sexual behaviour" (HSB). **HSB can occur online**

and/or face to face and can also occur simultaneously between the two. We will consider HSB in a child protection context.

We will follow the specialist support and advice on HSB available from the specialist sexual violence sector. Our DSL/DDSL will undertake training in HSB and incorporate this into our approach to managing sexual violence and sexual harassment. This training will include the Brook Traffic Light Tool.

Addressing inappropriate behaviour **can** be an important intervention that helps prevent problematic, abusive and/or violent behaviour in the future. Students displaying HSB have often experienced their own abuse and trauma. We understand it is important that they are offered appropriate support.

Hate crime *(Please see Glossary of Safeguarding for definitions)*
Hate Crime covers a range of behaviours, including discrimination, exclusion, verbal abuse, physical assault, bullying including cyber-bullying and inciting hatred.

Hate Crime can manifest in the college environment. Our response may involve action and support from various agencies, including statutory agencies or educating the perpetrator about their language and impact. Following the incident, we will schedule check-ins with the victim to check on their well-being and ensure the issue has not continued.

All hate crime incidents reported in our setting must be recorded. The DSL will regularly review this data to identify emerging themes and inform preventative and responsive work around hate crime.

Racist incidents
A racist incident is "any incident which is perceived to be racist by the victim or any other person", according to the Stephen Lawrence Inquiry report.
We will comply with the Equality Act 2010, and not unlawfully discriminate against pupils or prospective pupils on the grounds of race (or other protected characteristics).
In line with the public sector equality duty (PSED) we will:
- Eliminate discrimination and other conduct that is prohibited by the Act.
- Advance equality of opportunity between people who share a protected characteristic and people who do not share it.
- Foster good relations across all characteristics – between people who share a protected characteristic and people who do not share it.
- Comply with both specific education law on exclusions, and general law on discrimination, when suspending or permanently excluding pupils.

All racist incidents reported in our setting must be recorded.

Telford and Wrekin Council requires the college to report racist incidents on an Individual and Annual Return, Racist Incident Reporting and Recording System (IRIS). The reporting of incidents should take place within 7 days of the incident being reported or as soon as reasonably practicable. The DSL will regularly review this data to identify emerging themes and inform preventative and responsive work around racist incidents.

We will manage racist incidents in line with our anti-bullying policy and positive behaviour policy.

Our approach to preventing all forms of child-on-child abuse
We will undertake pre-planning, training for staff and implement an effective child-on-child abuse policy to help us develop the foundation for a calm, considered and appropriate

response to any reports. We will review these regularly. The DSL (or DDSL) will engage with the local response to child-on-child abuse.

We understand the best responses to child-on-child abuse are based on a whole setting approach to safeguarding and child protection and we will involve our whole community in this.

Systems are in place, well promoted throughout our setting, and understandable and accessible for our pupils to confidently report abuse, sexual violence and sexual harassment, knowing their concerns will be treated seriously, and that they can safely express their views and give feedback.

As part of our commitment to our students, we have identified the following DDSL and Safeguarding Officers, who are not part of our setting's senior leadership team, as staff in our setting, students can report child-on-child abuse to, if they choose not to report directly to a member of the senior leadership team.

Caroline Welson
Amy Brooks
Joanne Kimm
Helen Swinnerton
Paulette Kupiec
Shaun Bickley

All staff in our setting will undertake training in how to respond to child-on-child abuse, including reports of sexual violence or sexual harassment. Our DSL will undertake training to manage a report.

We accept the most effective preventative education programme will be through a whole setting approach that prepares students for life in modern Britain. Our setting has a clear set of values and standards, and these will be upheld and demonstrated throughout all aspects of school/college life. This is underpinned by our behaviour policy and pastoral support system, and by our planned programme of evidence-based content delivered through the whole curriculum. Our programme is developed to be age and stage of development appropriate. The DSL will support teachers in their delivery of this part of our curriculum. We recognise good practice allows students an open forum to talk through things. Such discussions can lead to increased safeguarding reports. Students will be made aware of the processes to raise their concerns or make a report and how any report will be handled. This will include processes when they have a concern about a friend or peer. All staff are aware of how to support students and how to manage a safeguarding report from another student.

The DSL will consider if external support or intervention is necessary as part of our approach to sexual violence and sexual harassment. We recognise specialist organisations can offer a different perspective and expert knowledge.

Our response to child-on-child abuse, including reports of sexual violence or sexual harassment and hate crime
It is our aim to always recognise, acknowledge and understand the scale of harassment and abuse. We aim to never downplay some behaviours related to abuse that can lead to a culture of unacceptable behaviour, an unsafe environment and in worst case scenarios a culture that normalises abuse leading to students accepting it as normal and not coming forward to report it.

Where necessary we will work with other professionals, agencies and partners in our response. This may include the TWSP partners, the relevant local authority children's social care departments, the police and other services.

We recognise that students may not find it easy to tell staff about their abuse verbally. Students can show signs or act in ways that they hope adults will notice and react. In some cases, the victim may not make a direct report.

The immediate response to a report
If a member of staff thinks for whatever reason that a child may be at risk of or experiencing abuse by another child/ren, or that a child may be at risk of abusing or may be abusing another child/ren, they should discuss their concern with the DSL (or DDSL) without delay. ***(Please see Glossary of Safeguarding Report)***

Risk assessment and safety planning & support
We take the view that child-on-child abuse does happen even if it is not reported. Therefore, on the advice of the TWSP we have implemented a risk assessment to help to minimise the risk of child-on-child abuse ***(Please see Glossary of Safeguarding)***.

Action following a report of child-on-child abuse, including sexual violence and/or sexual harassment
Our DSL/DDSL have a complete safeguarding picture and they are the most appropriate people to advise on our initial response. Important considerations will include:

Options to manage the report
(Please see Glossary of Safeguarding)

In borderline cases the DSL (or DDSL) may consult with Family Connect, and/or other relevant agencies on a no-names basis (where possible) to determine the most appropriate response.

Where the DSL (or DDSL) considers or suspects that the alleged behaviour in question might be abusive or violent on a spectrum or where the needs and circumstances of the individual students in question might otherwise require it, the DSL (or DDSL) will contact Family Connect or the local social care team for the young person and/or the police immediately and, in any event, within 24 hours of the DSL (or DDSL) becoming aware of the alleged behaviour. The DSL (or DDSL) will discuss the concern(s) or allegation(s) with the agency and agree on a course of action, which may include:
1. manage internally;
2. early help;
3. referral to children's social care; and
4. reporting to the police.

All concerns, discussions, decisions, and reasons for decisions will be recorded (written or electronic).

If bail conditions are in place, we will consider what additional measures may be necessary to manage any assessed risk of harm that may arise within our setting.

Ongoing response to child-on-child abuse, including sexual violence or sexual harassment and hate crime

We will consider the principles based on effective safeguarding practice and to help shape any decisions regarding safeguarding and supporting the victim and the alleged perpetrator(s). We will consider what support is the most appropriate to support all students involved. ***(Please see Glossary of Safeguarding)***

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

We recognise both CSE and CCE are forms of abuse. They both occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a young person into sexual or criminal activity, in exchange for something the victim needs or wants, and/or for the financial advantage or increased threat of violence. CSE and CCE can affect young people, both male and female and can include young people who have been moved for the purpose of exploitation.

We know that different forms of harm often overlap, and that perpetrators may subject students and young people to multiple forms of abuse, such as criminal exploitation and sexual exploitation.

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.

Young people can be exploited by adult males or females, as individuals or in groups. They may also be exploited by other young people, who themselves may be experiencing exploitation – where this is the case, it is important that the child perpetrator is also recognised as a victim.

Whilst the age of the young person may be a contributing factor for an imbalance of power, there are a range of other factors that could make a young person more vulnerable to exploitation, including, sexual identity, cognitive ability, learning difficulties, communication ability, physical strength, status, and access to economic or other resources.

Some of the following can be indicators of both child criminal and sexual exploitation where students:
- appear with unexplained gifts, money or new possessions;
- associate with other students involved in exploitation;
- suffer from changes in emotional well-being;
- misuse drugs and alcohol;
- go missing for periods of time or regularly come home late; and
- regularly miss college or education or do not take part in education.

We will provide additional support to young people who have been exploited to help maintain them in education.

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

If we feel that students may be being abused through exploitation, we will consult in the normal way with the relevant local authority social care team to seek advice through consultation. In Telford & Wrekin we will consider whether the incident follows a CE care and support Pathway. The concerns will be followed through sensitively and appropriately with fellow professionals and the CE referral form will be completed. In relation to the CATE Risk Panels, where concerns are expressed around a child attending our setting, we will ensure attendance whenever possible as part of the established multi-agency process. Alongside this, we have taken the same steps and made all staff aware of the TWSP, A guide for professionals CATE leaflet. Due to the high number of reports in our borough, we will be particularly alert to CSE and CCE.

We will make parents and carers, students and young people aware of the relevant TWSP CATE leaflets. We will provide them with information on CEOP, the Child Exploitation and Online Protection command. Students and adults can use CEOP to report if they are concerned that a child is being sexually abused or groomed online.

We will take a proactive approach to minimising the risk of all types of exploitation. We will engage with lived experience work from the St. Giles Trust and other partners to benefit the whole college community, including staff, young people and parents. All staff will receive training and updates on child exploitation.

As a college our curriculum includes a programme of appropriate exploitation awareness, especially CSE raising awareness.

The Principal and DSL will exchange any relevant information with local partners in relation to exploitation as required to enable all professionals to react, monitor and protect students. The CSE lead attends the CSE lead network each half term.

The DSL will work with the CSE lead to focus on child exploitation, especially CSE and provide any required information to partners. The CSE lead will be known to parents and students. We will ensure the CSE lead is accessible to students.

We record all concerns about a student's welfare, including those relating to exploitation, especially CSE. We detail what the concerns are, what action was taken and what follow up is needed. The DSL will review all recorded safeguarding concerns, especially those pertaining CCE and CSE, as a minimum every six months to ensure all concerns are routinely recorded and shared with partner agencies.

We will carry out an annual review to consider the adequacy of our site security provision, including monitoring and recording any unauthorised access to our site, to ensure that our students are protected from potential perpetrators of child exploitation, especially CSE while at college. Any concerns will be shared as required with the police and/or Family Connect. Our site security audit findings will be used to update and review our site security risk assessment.

We act in the spirit of the recommendations pertaining to schools and colleges from the published report of the [Independent Inquiry Telford Child Sexual Exploitation](#), published July 2022.

We will use the Telford & Wrekin Partnership Threshold Guidance, [Child Exploitation Risk Threshold Indicator](#) to identify the care and support needs of students involved in exploitation. Where vulnerable care and support needs are identified as 'vulnerable,' we will consult with the CATE Team, Telford and Wrekin Council. Where care and support needs are identified as 'complex' or 'acute,' we will refer to Family Connect. We will complete the West Mercia Police Protected Partner Intel form to share any relevant exploitation intelligence, this will be emailed to protect@westmercia.pnn.police.uk. In emergencies we will report information to the police via 999 for non-emergencies we will report information to the police via 101 or contactus@westmercia.police.uk

Child Criminal Exploitation (CCE)
Some specific forms of CCE can include students being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting or pickpocketing. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others. *(Please see Glossary of Safeguarding)*

Child Sexual Exploitation (CSE)

CSE is a form of child sexual abuse. Sexual abuse 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 clothing. It may include non-contact activities, such as involving students in the production of sexual images, forcing students to look at sexual images or watch sexual activities, encouraging students to behave in sexually inappropriate ways or grooming a child in preparation for abuse including via the internet. ***(Please see Glossary of Safeguarding)***

We will make the following further information on signs of a child's involvement in sexual exploitation available to staff. Child sexual exploitation: guide for practitioners

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. students and vulnerable adults are exploited to move, store/ sell drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims.

Students can be targeted and recruited into county lines in a number of locations including our setting, other education settings, student's homes and care homes.

Students are also increasingly being targeted and recruited online using social media. Students 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 indicators for CSE and CCE as detailed above may be applicable to where students are involved in county lines. Some additional specific indicators that may be present where a child/student is criminally exploited through involvement in county lines are /students who:
- go missing and are subsequently found in areas away from their home;
- 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; and
- have their bank accounts used to facilitate drug dealing.

We will make the Home Office guidance on the signs of a child's/students involvement in county lines available to staff.

If a child/student is suspected to be at risk of or involved in county lines, a safeguarding referral will also be considered alongside consideration of availability of local services/third sector providers who offer support to victims of county lines exploitation, such as CLIMB.

Modern Slavery and the National Referral Mechanism (NRM)

Staff understand that 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.

We know that 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 NRM is available in the Modern Slavery Statutory Guidance.

Mental Health
All staff are aware that mental health problems can, in some cases, be an indicator that a child/student has suffered or is at risk of suffering abuse, neglect or exploitation.

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

Where students have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. Staff will be made aware of how these student's experiences; can affect their mental health, behaviour, and education.

If staff have a mental health concern about a child/stduent that is also a safeguarding concern, immediate action should be taken, by speaking to the DSL or a DDSL and recording their concern.

We will follow the DfE guidance on Mental Health and Behaviour in Schools.

Please refer to our Mental Health & Well-being policy.

Serious violence
All staff are aware of the indicators, which may signal that students are at risk from, or are involved with serious violent crime. These may include increased absence from school, 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 well-being, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that students have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation. We recognise that the likelihood of involvement in serious violence may be increased by factors, such as being male, having been frequently absent or permanently excluded from college and having experienced child maltreatment and having been involved in offending.

Staff are aware of the associated risks and understand the measures in place to manage these.

We will consider the risk in the hours just before or just after college, when pupils are travelling to and from college is when violence can often peak, and these times can be particularly risky for young people involved in serious violence.

We will follow the advice provided in the Home Office's Criminal exploitation of children and vulnerable adults: county lines guidance.

We recognise to help prevent violence in our setting this can require a mix of universal, targeted or specialist interventions. Our setting leaders will aim to:
- develop skills and knowledge to resolve conflict as part of the curriculum;

- challenge aggressive behaviour in ways that prevent the recurrence of such behaviour;
- understand risks for specific groups, including those that are gender-based, and target interventions;
- safeguard, and specifically organise child protection, when needed;
- carefully manage individual transitions between educational establishments, especially into Pupil Referral Units (PRUs) or alternative provision; and
- work with local partners to prevent anti-social behaviour or crime.

In order to tackle violence affecting our setting and the community, we know it is important to:
- understand the problems that young people are facing both in our setting and in their local community;
- consider possible avenues of support; and
- work with local partners (who may have valuable information, resources or expertise).

Working with the local community safety partnership, Serious Violence Duty Sub-group, the youth offending team and the neighbourhood police team will help us to achieve a full understanding of the context we are working in. As part of our emergency management planning, we have in place systems for targeting and responding to individual or group violence. Even if violent incidents themselves do not appear to be an immediate concern, there may be a need to build resilience to such problems for the future.

Evidence shows that early-stage intervention is an effective strategy for preventing students becoming involved in violence, crime or antisocial behaviour later in life. We will assess what will work best in preventing violence in our setting to decide who to involve in providing intervention.

Child abduction and community safety incidents
We recognise child abduction as the unauthorised removal or retention of a minor from a parent or anyone with legal responsibility for the child. Child abduction can be committed by parents or other family members; by people known but not related to the victim (such as neighbours, friends and acquaintances); and by strangers.

We know that other community safety incidents in the vicinity of our setting can raise concerns amongst students and parents, for example, people loitering nearby or unknown adults engaging students in conversation.

As students get older and are granted more independence (for example, as they start walking to school on their own) we will give them practical advice on how to keep themselves safe. This may include outdoor-safety lessons run by teachers or other professionals. We will aim to build on building student's confidence and abilities rather than simply warning them about all strangers.

Students and the court system
We recognise that sometimes students are required to give evidence in criminal courts, for crimes committed against them or for other crimes they have witnessed. We will follow the age appropriate guides to support young people 5-11 year-olds and 12-17 year-olds.

We will follow these guides to ensure the correct process is followed and support and special measures are made available.

We understand that when child arrangements via the family courts are made following separation, this can be a stressful time, and entrench conflict in families and this can be

stressful for students. We will follow the [guidance of the Ministry of Justice](#) in managing these situations.

Students with family members in prison
We recognise that students who have a parent in prison are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. We will use the information from [NICCO](#), to help mitigate negative consequences for those students.

Cybercrime
We understand 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 school'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.

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

If there are concerns about a child in this area, the DSL (or a DDSL), will consider referring into the **Cyber Choices** programme.

Parent conflict
We are committed to helping families to communicate better. We know that relationships are key and positive communication is what we want to see.

Good quality relationships are a right and not a privilege. For many families, stress is a large part of everyday life and stress is often the reason relationships feel strained and communication is poor. Whilst it can be hard to eliminate stress from everyday life, we understand that we can work towards improving the way we react, by communicating in more constructive ways.

When supporting families, we have a unique opportunity to enable communication in a more positive manner as opposed to in a way that ultimately damages their relationship.

We will work with families using solution focused ways to guide people towards working out what better, looks life for them. We understand this is a more effective strategy than offering our own advice and solutions. When supporting families with struggling relationships we will consider the following:
- don't assume you know what is going on, explore both parties' thoughts and feelings;
- be curious, what is really going on?;
- encourage a culture of appreciation between the people you are supporting. Kindness wins over blame every time;
- Remember that not everyone feels able to change, all we can do is offer support, but someone needs to want things to be different in order to make change happen, and

- It's normal to feel uncomfortable sometimes talking to someone about their relationship, we will not try to fix things or give advice but instead ask thoughtful, open questions.

Domestic abuse

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

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

All students 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 students. In some cases, an individual 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 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.

We will always liaise with agencies in a two-way process where domestic abuse is a factor in a household. Students within our care will be supported where needed. We are part of the Operation Encompass process where domestic incidents are shared directly with us, so that we have an initial awareness. To this end, we will be part of any agency referral, in a two-way process, such as the Domestic Violence Multi-agency Risk Assessment Conference (MARAC) and Multi Agency Public Protection Arrangements (MAPPA) or any other named agencies where these specific issues are a factor that may impair and impact on student's development.

Refuge runs the National Domestic Abuse Helpline, which can be called free of charge and in confidence, 24 hours a day on 0808 2000 247. Its website provides guidance and support for potential victims, as well as those who are worried about friends and loved ones. It also has a form through which a safe time from the team for a call can be booked.

We will use the following additional advice on identifying students who are affected by domestic abuse and how they can be helped:
- NSPCC- UK domestic-abuse Signs Symptoms Effects
- Refuge what is domestic violence/effects of domestic violence on children
- SafeLives: young people and domestic abuse
- Domestic abuse: specalist sources of support
- Home : Operation Encompass

Homelessness

We understand that being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The DSL (and deputies) are aware of contact details and referral routes in to the [Local Housing Authority](#) so they can raise/progress concerns at the earliest opportunity. Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property. As appropriate, we will make referrals and/or hold discussions with the Local Housing Authority. However, this does not, and will not, replace a referral into children's social care where a child has been harmed or is at risk of harm.

We will consider homelessness in the context of students who live with their families, and intervention will be on that basis.

We recognise in some cases 16- and 17-year-olds could be living independently from their parents or guardians, for example through their exclusion from the family home, and will require a different level of intervention and support. Children's services will be the lead agency for these young people and the designated safeguarding lead (or a DDSL) will ensure appropriate referrals are made based on the child's circumstances. In these cases will follow the department and the Ministry of Housing, Communities and Local Government joint statutory guidance on the [provision of accommodation for 16 and 17 year olds who may be homeless and/ or require accommodation](#).

So-called 'honour-based' abuse (including Female Genital Mutilation and Forced Marriage)
We recognise that so-called 'honour-based' abuse (HBA) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices, such as breast ironing. Abuse committed in the context of preserving "honour" often involves a wider network of family or community pressure and can include multiple perpetrators. We are aware of this dynamic and will consider additional risk factors when deciding what form of safeguarding action to take. We see all forms of HBA as abuse (regardless of the motivation) and will handle and escalate as such. We will ensure our community are alert to the possibility of a child being at risk of HBA, or already having suffered HBA.

Actions
If staff have a concern regarding a child that might be at risk of HBA or who has suffered from HBA, they should speak to the DSL (or DDSL). As appropriate, they will activate the local safeguarding procedures by contacting Family Connect/local social care team for the child and if necessary the police.

FGM
We understand that FGM comprises of 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.

We will follow the National FGM Centre [Female Genital Mutilation: Guidance for schools](#).

FGM mandatory reporting duty for teachers
Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a statutory duty upon **teachers** along with regulated health and social care professionals in England and Wales, to report to the police where

they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Those failing to report such cases will face disciplinary sanctions. It will be rare for teachers to see visual evidence, and they should **not** be examining pupils or students, but the same definition of what is meant by "to discover that an act of FGM appears to have been carried out" is used for all professionals to whom this mandatory reporting duty applies. Information on when and how to make a report can be found at [Mandatory reporting of female genital mutilation procedural information.](#)

Teachers **must** personally report to the police cases where they discover that an act of FGM appears to have been carried out. Unless the teacher has good reason not to, they should still consider and discuss any such case with our DSL (or DDSL) and involve children's social care as appropriate. The duty does not apply in relation to those at risk or suspected cases (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 in cases where the woman is 18 or over. In these cases, teachers will follow our local safeguarding procedures and report to Family Connect or the local social care team for the child. The following is a useful summary of the FGM mandatory reporting duty: [FGM Fact Sheet](#).

In respect of FGM we will adopt the local [FGM Practice Guidelines and Resource Pack](#) as part of safeguarding responsibilities and inform/educate our staff in this particular area.

Forced marriage
We understand that forcing a person into a marriage is a crime in England and Wales. We know that 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. We play an important role in safeguarding students from forced marriage.

We will follow the Forced Marriage Unit published [statutory guidance](#) and [Multi-agency guidelines](#). Our staff can contact the Forced Marriage Unit if they need advice or information, contact: 020 7008 0151 or email fmu@fco.gov.uk

Preventing radicalisation
We understand students are vulnerable to extremist ideology and radicalisation. Similar to our role in protecting students from other forms of harms and abuse, we will also protect students from this risk as part of our safeguarding approach.

- **Extremism** is the vocal or active opposition to our fundamental British 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** refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.
- **Terrorism** is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat **must** be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

We accept that there is no single way of identifying whether a child is likely to be susceptible to an extremist ideology. Background factors combined with specific influences, such as family and friends may contribute to a child's vulnerability. Similarly, radicalisation can occur through many different methods (such as social media or the internet) and settings (such as within the home).

We understand it is, where possible, our role to protect vulnerable people from extremist ideology and intervene to prevent those at risk of radicalisation being radicalised. As with other safeguarding risks, through appropriate training staff will be alert to changes in student's behaviour, which could indicate that they may be in need of help or protection. Staff will use their judgement in identifying students who might be at risk of radicalisation and act proportionately which must include reporting their concerns to the DSL (or DDSL) who will consider making a Prevent referral.

The Prevent duty
We are subject to a duty under section 26 of the Counter-Terrorism and Security Act 2015 (the CTSA 2015), in the exercise of our functions, to have "due regard to the need to prevent people from being drawn into terrorism". This duty is known as the Prevent duty.

We see The Prevent duty as part of our wider safeguarding obligation. Our DSL and deputies and other senior leaders are familiar with the revised Prevent duty guidance: for England and Wales, especially paragraphs 57-76.

As a college/sixth form we will follow the additional guidance: Prevent duty guidance: for further education institutions in England and Wales that applies to colleges.

We will follow the published advice for schools on the Prevent duty.

We aim to ensure all staff have completed training on the Prevent duty.

Channel
Channel is voluntary, as a confidential support programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. We will refer to the relevant Channel programme if we are concerned that an individual might be vulnerable to radicalisation. We will always seek the individual's consent to do so. We will attend and engage with the Channel panel to assist in any assessment.

We will follow the Channel guidance.

If we feel students are being abused through extremism or being radicalised, we will consult directly with the local police Counter Terrorism Unit (CTU). This is done with a Prevent referral form, following the Prevent flowchart. The referral will be sent to the police. As with all referrals, this referral will be dealt with appropriately with professionals. If it is deemed from the Prevent team that the intervention is not criminal and does not warrant a Channel Panel, but needs local support, we will work with those professional leads for Telford & Wrekin Council. Presently that is **Jas Bedesha,** jas.bedesha@telford.gov.uk. The education lead for Telford & Wrekin Council is **Joanne Hanslip**, joanne.hanslip@telford.gov.uk. Where necessary, the DSL (or DDSL) will consult with the Telford and Wrekin professional lead, education lead or CTU officers: Alison Potts, a.potts@west-midlands.pnn.police.uk, or Holly Aungiers, holly.aungiers@westmercia.police.uk, to seek advice on making prevent referrals.

(Please see ANNEX B for Telford & Wrekin Prevent Pathway)

What to do if you have concerns about a child

Staff working in our setting maintain the attitude of **'it could happen here'** where safeguarding is concerned and will always act in the **best interests** of the child.

If staff have **any concerns** about a child's welfare, they must act on them **immediately**.

(**_Please see ANNEX C - a flow chart setting out the process for staff when they have concerns about a child_**)

Where someone has a concern about the welfare of a child, they should speak to the DSL (or DDSL). Options will then include;

- managing any support for the child internally via our own pastoral support processes;
- undertaking an early help assessment; or
- making a referral to statutory services, for example, as the child is in need or suffering or likely to suffer significant harm or impairment. This will involve contacting Family Connect or the local social care team for the child.

Where we discover a child is alone or we believe a child is alone at home or in the community we will contact the police immediately and not escort the child back to college. We will report this to the police, via 101. If the child is immediate danger, then we will report to the police, via 999. We will then notify Family Connect or the emergency duty team as soon as reasonably practicable.

NPCC- When to call the police will be considered by the DSL to help them understand when they should consider calling the police and what to expect when they do.

All referrals to the local social team must be followed up in writing using the social care team's relevant referral/request forms. For referrals in Telford & Wrekin we will use the Request for service form.

If in exceptional circumstances, the DSL or a DDSL is not available, the person who has the concern should speak to a member of the senior leadership team and/or take advice from Family Connect or the local social care team for the child. In these circumstances, any action taken should be shared with the DSL (or DDSL) as soon as is practically possible.

Staff should not assume a colleague, or another professional will take action and share information that might be critical in keeping students safe. They should be mindful that early information sharing is vital for effective identification, assessment and allocation of appropriate service provision. 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. If in any doubt about sharing information, staff should speak to the DSL or a DDSL.

In the unlikely event of a person in our college who has a concern for a child is not satisfied with the action taken by the DSL or DDSL they should speak to them again to share their concerns. If they remain unsatisfied with the response, then the person who had the original concern should speak to another trained DSL to seek resolution. If following speaking to another trained DSL the person remains concerned that appropriate action has not been taken to safeguarding or protect the child, the person should report their original concern to Family Connect or the local social care team for the child and follow the college Whistleblowing procedures.

Referral agencies

Telford & Wrekin social care team Family Connect 01952 385385 Out of Hours 01952 676500	Shropshire social care team First Point of Contact 0345 678 9021 Out of Hours 0345 678 9040	Staffordshire social care team Childrens Advice and Support Service 0300 111 8007 Out of Hours 0345 604 2886	Wolverhampton social care team MASH 01902 555392 Out of Hours 01902 552999
If you think a child is in immediate danger, **call the police on 999**			
Childline 0800 1111	NSPCC 0800 800 5000		Protecting Vulnerable People (West Mercia Police): 101

Immediate response to a child or parent

Staff will follow effective safeguarding practice which includes:

- if possible, managing reports with two members of staff present, (preferably one of them being the DSL, DDSL or BeSafe team). However, this is not always possible;
- where the report includes an online element, we will be aware of searching, screening and confiscation advice (for schools) and UKCIS sexting advice (for schools and colleges). The key consideration is for staff not to view or forward illegal images of a students. The highlighted advice provides more details on what to do when viewing an image is unavoidable. In some cases, it may be more appropriate to confiscate any devices to preserve any evidence and hand them to the police for inspection;
- not promising confidentiality at this initial stage as it is very likely a concern will have to be shared further (for example, with the DSL or children's social care) to discuss next steps. Staff will only share the report with those people who are necessary in order to progress it. It is important that the victim understands what the next steps will be and who the report will be passed to;
- recognising a young person is likely to disclose to someone they trust: this could be **anyone** in our setting. It is important that the person to whom the young person discloses recognises that the young person has placed them in a position of trust. They should be supportive and respectful of the young person;
- keeping in mind that certain students may face additional barriers to telling someone because of their vulnerability, disability, sex, ethnicity and/or sexual orientation;
- listening carefully to the students, reflecting back, using the students' language, being non-judgmental, being clear about boundaries and how the report will be progressed, not asking leading questions and only prompting the students where necessary with open questions – where, when, what, etc or TED 'tell me', 'explain to me' and 'describe'. It is important to note that while leading questions should be avoided, staff can ask students if they have been harmed and what the nature of that harm was;
- considering the best way to make a record of the report. Best practice is to wait until the end of the report and immediately write up a thorough summary. This allows the staff member to devote their full attention to the and to listen to what they are saying. It may be appropriate to make notes during the report (especially if a second member of staff is present). However, if making notes, staff should be conscious of the need to remain engaged with the student and not appear distracted by the note taking. Either way, **it is essential a first-handwritten record is made**;

- only recording the facts as the student presents them. The notes should not reflect the personal opinion of the note taker. We are aware that notes of such reports could become part of a statutory assessment by children's social care and/or part of a criminal investigation; and
- informing the DSL (or DDSL), as soon as practically possible, if the DSL (or DDSL) is not involved in the initial report.

If conversations need to take place and confidentiality is paramount to welfare, then these conversations will be held in appropriate settings and away from any general areas, where that confidentiality may be compromised.

We will never allow fears about sharing information to stand in the way of the need to promote the welfare and protect the safety of students. We expect **concerns that arise in a morning will be reported to the DSL (or DDSL) by lunchtime that day. Concerns that arise in an afternoon should be reported by or as close to the end of the college day, or as soon as reasonably practicable**. Any concerns arising outside of the normal college day should be reported as quickly as possible. If in doubt concerned, parties should talk with the DSL (or DDSL). **Delay is unacceptable and may result in disciplinary action**.

Where a student is suffering, or is likely to suffer from harm or impairment, we will make a referral to children's social care (and if appropriate the police) immediately. If we are unsure which local authority the student lives in we will use the online tool [Report Child Abuse to Your Local Council](#) to direct us to the relevant local children's social care contact number.

Children's social care assessments should consider where students are being harmed in contexts outside the home. Therefore, we will provide as much information as possible as part of the referral process. This will allow any assessment to consider all the available evidence and enable a contextual approach to address such harm.

Our role is to refer the information received and **under no circumstances** become the investigator.

We will work appropriately with each student, their family and other agencies to protect in all cases the welfare of the student. We will work in partnership and fulfil the ethos and abide by the principles of the 2023 [Telford and Wrekin threshold guidance](#) or the threshold guidance for the local social care team for the student.

Staff working at this setting may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead professional. Any such cases will be kept under constant review and consideration given to a referral to children's social care assessment for statutory services if the student's situation does not appear to be improving or is getting worse.

Staff working at this setting will be made aware of the process for making referrals to children's social care and statutory assessments. This is under the Children Act 1989, especially **section 17 (children in need)** and **section 47 (a child suffering, or likely to suffer, significant harm),** that may follow a referral; along with the role staff might be expected to play in such assessments.

A **child in need** is defined under the Children Act 1989 as a student who is unlikely to achieve or maintain a reasonable level of health or development, or whose health and development is likely to be significantly or further impaired, without the provision of services; or a student who is disabled. Local authorities are required to provide services

for students in need for the purposes of safeguarding and promoting their welfare. Students in need may be assessed under section 17 of the Children Act 1989.

Local authorities, with the help of other organisations as appropriate, have a duty to make enquiries under section 47 of the Children Act 1989 if they have reasonable cause to suspect that a **student is suffering, or is likely to suffer, significant harm**. Such enquiries enable them to decide whether they should take any action to safeguard and promote the student's welfare and must be initiated where there are concerns about maltreatment, including all forms of abuse and neglect, female genital mutilation or other so-called 'honour based' violence, and extra-familial threats like radicalisation and sexual exploitation.

Where there are visible injuries, all staff should record these on a body map diagram and describe them the best they can. We will assume good evidential practice to get two persons involved who have seen the injury and can account for it on the body map, then immediately follow up with a referral as described above.

Under **no** circumstances will staff photograph injuries seen on students. Our staff are not expert witnesses. If the concern is around non-accidental injury, then that is a matter that requires immediate attention on the day resulting in an appropriate referral to Family Connect or the local social care team for the student. Those professionals will control the process of photographic evidence gathering and assessment.

For staff to interpret any concerns we will assess each incident as it appears. In respect of assessing any bruising to a student we will refer to the Bruising of Children guidance produced by the TWSP to assist their decision making.

The role of the local authority
Within one working day of a referral being made, a local authority social worker should acknowledge receipt to us as the referrer and make a decision about the next steps and the type of response that is required. This will include determining whether:
 • the student requires immediate protection and urgent action is required;
 • any services are required by the student and family and what type of services;
 • the student is in need, and should be assessed under section 17 of the Children Act 1989;
 • there is reasonable cause to suspect the student is suffering or likely to suffer significant harm, and whether enquiries must be made and the student assessed under section 47 of the Children Act 1989; and
 • further specialist assessments are required to help the local authority to decide what further action to take.

The referrer will, even if they are not the DSL (or DDSL), follow up if this information if it is not forthcoming.

If, after a referral, the student's situation does not appear to be improving, we will consider following TWSP local escalation procedures or those for the safeguarding partnership for the student to ensure our concerns have been addressed and, most importantly, that the student's situation improves.

The Telford & Wrekin Council Director of Children's Services is **Jo Britton**.

Record keeping
All concerns will be recorded first hand by the person raising the concern, using the relevant paper or electronic recording system used by visitors, staff and supply staff. Concerns will be passed onto the DSL or DDSL in a timely manner. DSLs will record in

writing any discussions and decisions made, and the reasons for those decisions, Information will be kept confidential and stored securely. We will keep concerns and referrals in a separate child protection file for each student.

Records 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, decisions reached and the outcome.

If in doubt about recording requirements, visitors, staff and supply staff will discuss with DSL (or DDSL).

Anyone who has a safeguarding concern should follow these recording principles:
- record the date, time, place and context of the concern, recording facts and who you shared them with;
- record where you spoke with the student or parent and personal safety details, such as 'I discussed the incident with the student in the Headteacher's office with the door open' or justify if it were closed, but naming those who you told this to be the case. If alone, reason that rationale stating 'the child stated they would only confide in me if I was alone';
- if it is observation of bruising or an injury try to record detail, e.g. 'right arm, above elbow', 'bruise approximately 5cm in diameter noticed on back of lower right leg';
- note the non-verbal behaviour and the key words in the language used by the student or parent (try not to translate into 'proper terms' ensuring that you use the student or parent's own words). Body language should be noted and support any record of disclosure; and
- it is important to retain on file signed original handwritten notes and pass them on to the DSL (or DDSL) who may ask you to complete a written referral to children's social care.

We adopt guidance from TWSP Workbook for Designated Safeguarding Leads and Governors/Committee Members/Trustees/Proprietors with responsibility for safeguarding, incorporating: Advice note on Child Protection record keeping.

Visitors, staff and supply staff note down concerns on a Cause for Concern form available from reception. The visitor or supply member of staff should inform the DSL (or DDSL) as soon as their concern arises. Once completed, they should hand the Cause for Concern form to the DSL (or DDSL). All Cause for Concern forms will be uploaded directly to CPOMS/placed into the student's safeguarding record to help to maintain a first-hand record.

This school/college has adopted an electronically maintained recording system called Child Protection Online Management System (CPOMS). The CPOMS system is a totally secure system of record keeping which enables us to quickly encapsulate a student journey with us.

The DSL and deputies record all concerns on CPOMS. We will ensure that a restricted number of staff will have full access to this system as named key holders. If concerns have been logged by staff via this process it should not be presumed that this is an instant notification that has been seen immediately. If appropriate the issue should not assume anything and a verbal conversation should also take place if needed for clarification.

Concerns are stored chronologically in a safeguarding file/electronically for that student.

What to do if you have safeguarding concerns about another staff member

If staff have safeguarding concerns, or an allegation is made about another member of staff (including supply staff, volunteers and contractors) posing a risk of harm to students, then:

- this should be referred to the Principal;
- where there are concerns/allegations about the Principal, this should be referred to the chair of governors.

Any concerns about staff must be recorded and stored using our secure HR system and referred to the relevant person above.

Any allegations that may meet the harms threshold will be addressed as set out in Part four, Section one of KCSIE. Any concerns that do not meet the harm threshold, referred to, as 'low level concerns' will be addressed as in Part four, Section two of KCSIE. When an allegation is made, the DSL will be responsible for ensuring that a student is not at risk and refer cases of suspected abuse to Family Connect or the student's local social care team.

We will **only** undertake basic enquiries to help determine whether there is any foundation to the allegation.

The LADO for Telford & Wrekin Council is Glenn Ashbrooke who will be informed of all allegations that come to our attention and appear to the meet the criteria set out in Part Four, Section One of KCSIE, so they can consult police and children's social care services as appropriate. All LADO referrals must be made via Family Connect, unless the student is open to a social worker and then the LADO referral must be made via the student's allocated social worker.

The governing body will be notified of any allegations or low-level concerns at each scheduled meeting. The governor responsible for safeguarding will be informed soon after the allegation or low-level concern has been received. Their role is not to know details of the persons or concern but to ensure policies and procedures are adhered to and to provide relevant support.

We will make a referral to the Disclosure and Barring Service (DBS) if a person in regulated activity has been dismissed or removed due to safeguarding concerns or would have been had they not resigned.

We believe that those who work within our community are in positions of trust and as such codes of conduct are based on the underlying principle that the highest standards are expected from all. In line with KCSIE a separate code of conduct policy will be adopted by this setting for staff, volunteers, contractors and governors.

[Guidance for safer working practice for those working with children and young people in educational settings](#) produced by the Safer Recruitment Consortium, provides excellent guidance on the expected standards of all those that work with students. We will make all those in our community aware of its existence and this will work alongside the separate code of conduct mentioned above and any established human resources processes currently in place.

To help avoid potential allegations and safeguarding concerns, and for the safety and welfare of pupils and the protection of staff, we will make classrooms highly visible places whereby easy viewing is possible. The masking of windows is forbidden and as such treated as a safeguarding issue for the protection of all. There may be exceptional circumstances where masking of classrooms is needed and justified, for example, for the teaching of

drama; in these cases, the Principal will make a judgement on a case-by-case basis being appropriate, balanced and proportionate.

What to do if you are concerned about another safeguarding practice in the college

All staff and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in our safeguarding regime and know that such concerns will be taken seriously by our senior leadership team.

Please refer to our Whistleblowing procedures.

Where staff feel that they cannot report a concern through the above channels general guidance can be found at Advice on whistleblowing. The NSPCC whistleblowing helpline is available for staff who do not feel able to raise concerns regarding child protection failures internally. Staff can call 0800 028 0285 or email help@nspcc.org.uk

Part two: The management of safeguarding

The **designated governor** with responsibility for safeguarding is **Gail Bleasby**.

The **designated governor** with responsibility for 'Prevent' is **Gail Bleasby**.

Their role is to take **leadership** responsibility for our safeguarding arrangements.

The governing body/proprietor has strategic leadership responsibility for our safeguarding arrangements and **must** ensure that we comply with their duties under legislation. They **must** have regard to KCSIE, ensuring our policies, procedures and training in our setting are effective and comply with the law at all times.

Our principal will ensure that the policies and procedures, adopted by this governing body/proprietor, are understood, and followed by all staff.

All governors/proprietors have received appropriate safeguarding and child protection training (including online safety) training at induction. This will ensure they have the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies in our setting are effective and support the delivery of a robust whole-setting approach to safeguarding. This training will be updated annually.

The governing body/proprietor will act under their obligations under the Data Protection Act 2018 and the UK GDPR, Human Rights Act 1998, the Equality Act 2010, (including the Public Sector Equality Duty), and their local multi-agency safeguarding arrangements.

Our approach to safeguarding

Our governing body will ensure that we facilitate a whole setting approach to safeguarding. This means ensuring safeguarding and child protection are at the forefront and underpin all relevant aspects of process and our policy development. Ultimately, all systems, processes and policies will operate with the best interests of the student at the heart.

Where there is a safeguarding concern, our governing body and our senior leaders will ensure the student's wishes and feelings are taken into account when determining what action to take and what services to provide. Systems are in place, and they will be well promoted, easily understood and easily accessible for students to confidently report abuse, knowing their concerns will be treated seriously, and knowing they can safely express their views and give feedback. We will work with students to remove any barriers to reporting.

We will facilitate staff to contribute to and shape our safeguarding arrangements and Child Protection policy.

We will ensure that suitable arrangements are in place to provide access for all staff to access safeguarding supervision. Please see our Safeguarding Supervision policy.

Policies and procedures

We aim to ensure there are appropriate policies and procedures in place in order for appropriate action to be taken in a timely manner to safeguard and promote students' welfare.

The designated safeguarding lead (DSL)

Our governing body has appointed Sarah Jones to be the DSL of this college and Caroline Welson to the DDSL. We will set out their responsibilities in their job description.

Sarah Jones will take ultimate responsibility for safeguarding and child protection, online safety, and understanding the filtering and monitoring systems and processes in place at our setting as the DSL and as an appropriate **senior member** of staff from our **leadership team**.

During term time, the DSL and/or DDSL will always be available (during our normal operating hours) for the staff to discuss any safeguarding concerns with. During out of hours/out of term activities we will provide appropriate cover by ensuring the DSL and/or DDSL is available.

Prior to any education visit, a risk assessment will be completed to consider if the DSL (or DDSL) needs to be present. We will always consider how quickly a DSL can respond to a safeguarding issue if they are not present. Where safeguarding concerns are raised during an educational visit the DSL (or DDSL) must be notified immediately, even if they are not physically present at the site of the educational visit. They will liaise with the person responsible for the education visit to manage the concern and refer to the relevant agencies.

The designated safeguarding lead will form part of a borough wide network, where information is shared, in a two-way process, with the Telford & Wrekin Council, Education Safeguarding Team.

They will complete the Safeguarding Audit - Education each year and submit to TWSP. The Safeguarding Audit – Education, will be supplied by the Telford & Wrekin Council Education Safeguarding Team.

The DSL and their deputies will fulfil their role and responsibilities as set out in Annex C KCSIE.

Multi-agency working

The DSL and any deputies will work with other agencies in line with Working Together to Safeguard Children.

Our governing body and the DSL are familiar with the TWSP arrangements. In Telford & Wrekin schools and colleges have been named as relevant agencies by the TWSP. We will engage with the TWSP as required and follow the Telford & Wrekin Threshold Guidance or the appropriate threshold guidance for where the student resides or for who is responsible for the student, to follow the local protocol for assessments.

The governing body of this setting expect staff to work with social care, the police, health services and other services to promote the welfare of students and protect them from harm. This includes us providing a coordinated offer of early help when additional needs are identified by us or another agency. We will never restrict access for children's social care to conduct a section 17 or section 47 assessment.

The DSL is expected to consider the requirement for students to have an Appropriate Adult. Further information can be found in the Statutory guidance - PACE Code C 2019.

Information sharing

We recognise that information is vital in identifying and tackling all forms of abuse and neglect, and in promoting student's welfare, including their educational outcomes. Schools and colleges have clear powers to share, hold and use information for these purposes.

We expect all staff to share information with practitioners and local agencies. We are committed to sharing information as early as possible to help identify, assess and respond to risks or concerns about the safety and welfare of students, whether this is when problems are first emerging, or where a student is already known to the local authority children's social care.

All child protection records are clearly marked as such and are kept securely locked on the premises and/or within CPOMS, the nominated persons are responsible, accountable, documented and are identifiable within our setting for total security. Also, procedures are in place when a member of staff leaves the setting or is on long term sick leave for their access to cease. Withdrawal of child protection records from our setting by staff will be noted and signed for, as will files released to professionals.

The child protection file is a separate file to the educational records. It must be noted that if files are asked to be secured, both files are key elements in any processes for which they are needed. It is important that on releasing files they are signed for on release and on return.

Pupil record files must be kept until the individual reaches the age of 25 years or in certain circumstances later. At this point the file should be disposed of confidently.

In respect of files being released when requested by the Police under <u>Section 29 of the Data Protection Act 2018 a form entitled 'Request to external organisation for the disclosure of personal data to the police-Under Schedule 2 Part 1 Paragraph 2 of the Data Protection Act 2018 and GDPR Article 6(1))d)</u>' should accompany that release and a copy will be retained for our records.

The college will also seek advice and adopt the <u>Information sharing advice for safeguarding practitioners</u>. If in any doubt we will seek advice from our **Data Protection Officer.** Upon releasing records, the college will request ID Badges for release. If the Police are only after minimal data e.g., address or phone number, we will ensure we check the police ID and we will record what information was asked for and the name of the police officer requesting it. A permission form may not be required on these occasions.

No named statistics in relation to child protection are an important part of performance information. These may be shared by the DSL with staff, other agencies or the governing body/proprietor/management committee.

In our management of information sharing we will use the following:
- Chapter one of <u>Working Together to Safeguard Children</u>, which includes a myth-busting guide to information sharing;
- <u>Information Sharing: Advice for Practitioners Providing Safeguarding Services to Children, Young People, Parents and Carers</u>. The seven golden rules for sharing information will be especially useful;
- The <u>Information Commissioner's Office (ICO</u>), which includes ICO GDPR FAQs and guidance from the department; and
- <u>Data protection: toolkit for schools</u> - Guidance to support schools with data protection activity, including compliance with the GDPR.

When a student leaves the college, the DSL will ensure their child protection file is transferred to the new school or college as soon as possible (within five working days of the student starting at their new college or education provider), ensuring secure transit, and confirmation of receipt will be obtained. We will transfer the child protection file separately from the main student file. As a receiving college we will ensure key staff such as DSL's and SENCO's, are aware as required. In addition to the child protection file. The DSL will share any relevant safeguarding information with the new college or educational provider in advance of a student leaving, including where a student has been or is open to 'Channel' Panel. If we are the current host school, we will **not** photocopy and retain child protection records. This is deemed from the Information Commissioners Office that this would contravene The Data Protection Act 2018, but rather produce a chronology to pass on with the child protection records and retain a copy of this chronology for themselves for audit purposes, this would be deemed as best practice.

All child protection records are reviewed annually in the summer term by the DSL, DDSL or Safeguarding Officers and checked to be chronological, tidy, legible and factual in content. The exception to this is safeguarding records where there are concerns of CSE, these are checked by the DSL every six months. This should be undertaken each year, as records may sometimes be immediately required by professionals. Where reports are needed for child protection and safeguarding meetings, these should include attendance figures.

Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare of students.

We will follow the guidance on the child protection file set out in Annex C KCSIE.

Opportunities to teach safeguarding

We will teach students about how to keep themselves and others safe, including online. We tailor the education provided to the specific needs and vulnerabilities of individual students, including those who are victims of abuse, and those with special educational needs and/or disabilities. We will do this through our Tutorial programme.

We will ensure that appropriate filters and monitoring systems that are in place, do not lead to unreasonable restrictions as to what students can be taught with regard to online teaching and safeguarding.

Online safety

We recognise online safety is a major concern for all professionals.

We believe it is essential that students are safeguarded from potentially harmful and inappropriate online material.

The aim of our approach to online safety is empowerment to protect and educate pupils and staff in their use of technology and establish mechanisms to identify, intervene in, and escalate any concerns where appropriate. We will ensure appropriate filtering and monitoring on school/college devices and networks. We aim to protect students from illegal, inappropriate or harmful content, and harmful online interaction with other users. We aim for our pupils to exhibit positive personal online behaviour and recognise inappropriate online conduct. We aim to protect students from commercial risks.

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

- **content:** being exposed to illegal, inappropriate or harmful content, for example: pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism.
- **contact:** being subjected to harmful online interaction with other users; for example: student to student pressure, commercial advertising and adults posing as students or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes'.
- **conduct:** personal online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying; and
- **commerce:** risks such as online gambling, inappropriate advertising, phishing and or financial scams. If we feel our pupils, students or staff are at risk, we will report it to the Anti-Phishing Working Group (https://apwg.org/).

We will ensure online safety is a running and interrelated theme whilst devising and implementing policies and procedures. This will include considering how online safety is reflected as required in all relevant policies and considering online safety while planning the curriculum, any teacher training, the role and responsibilities of the DSL (and DDSL) and any parental engagement.

We take seriously our duties to assist parents and help them with online safeguarding resources. As such, we will make them aware of relevant support services.

Where students are being asked to learn online at home we will follow the advice to support schools and colleges do so safely: safeguarding in schools colleges and other providers and safeguarding and remote education. We recognise the NSPCC and PSHE Association also provide helpful advice.

Through our regular communications with parents, we will reinforce the importance of students being safe online and tell parents what systems we use to filter and monitor online use. We will make parents aware of what their students are being asked to do online, including the sites we asked them to access. We will always be clear who from our school/college (if anyone) a student is going to be interacting with online.

While considering our responsibility to safeguard and promote the welfare of students and provide them with a safe environment in which to learn, we will do all that we reasonably can to limit students's exposure to risks from our IT system. We will ensure we have appropriate filters and monitoring systems in place. The leadership team and relevant staff, such as online safety lead will obtain an understanding of the filtering and monitoring provisions in place and manage them effectively and know how to escalate concerns when identified. We will do this by considering the age range of our students, the number of students, how often they access the IT system and the proportionality of costs versus risks.

The appropriateness of our filters and monitoring systems have been informed in part, by the risk assessment required by the Prevent Duty. To meet this duty we will work to meet the digital and technology standards. We will:

• identify and assign roles and responsibilities to manage filtering and monitoring systems.
• review filtering and monitoring provision at least annually.
• block harmful and inappropriate content without unreasonably impacting teaching and learning.

• have effective monitoring strategies in place that meet safeguarding needs.

We have the appropriate level of security protection in place, in order to safeguard our systems, staff and learners and we will review the effectiveness of these procedures periodically to keep up with evolving cyber-crime technologies.

We will carry out an annual review of our approach to online safety, supported by an annual risk assessment that considers and reflects the risks their students face.

Our governing body will question school leaders to gain a basic understanding of our approach to keeping students safe online; learn how to improve this approach where appropriate; and find out about tools, which can be used to improve the approach.

Mentors of trainee teachers and newly qualified teachers induct mentees and provide ongoing support, development and monitoring on online safety.

Non-maintained/controlled schools need to insert information about your own information technology policies.

Mobile and smart technology

We recognise that many students have unlimited and unrestricted access to the internet via mobile phone networks. This access means some students, while at our setting sexually harass, bully, and control others, via their mobile and smart technology, share indecent images consensually and non-consensually and view and share pornography and other harmful content.

Inspection

The use of 'reasonable force'

There are circumstances when it is appropriate for staff in our setting to use reasonable force to safeguard our young people. The term 'reasonable force' covers the broad range of actions used by staff that involve a degree of physical contact to control or restrain students. This can range from guiding a student to safety by the arm, to more extreme circumstances such as breaking up a fight or where a young person needs to be restrained to prevent violence or injury. 'Reasonable' in these circumstances means us 'using no more than is needed.' Our use of force may involve either passive physical contact, such as standing between pupils or blocking a student's path, or active physical contact such as leading a student by the arm out of the classroom.

We will always follow the advice for schools on the Use of Reasonable Force in Schools. We will also have regard to additional guidance Reducing the Need for Restraint and Restrictive Intervention for young people with learning disabilities, autistic spectrum conditions and mental health difficulties in health and social care services and special education settings.

We believe that the adoption of a 'no contact' policy in our setting could leave staff unable to fully support and protect our students. We will adopt a sensible approach allowing staff to make appropriate physical contact. The decision on whether to or not to use reasonable force to control or restrain a student is down to the professional judgement of the staff concerned and should always depend on individual circumstances.

When using reasonable force in response to risks presented by incidents involving students with SEND, mental health or with medical conditions, we will consider the risks carefully because we recognise the additional vulnerability of these groups. We will consider our duties under the Equality Act 2010 in relation to making reasonable adjustments, non-discrimination and our Public Sector Equality Duty.

We will plan positive and proactive behaviour support, for instance through drawing up individual behaviour plans for more vulnerable students, and agreeing them with parents and carers, we aim to reduce the occurrence of challenging behaviour and the need to use reasonable force. We will only use reasonable force where de-escalation processes have failed.

Hiring out our facilities and premises

Where we hire or rent out our facilities/premises to organisations or individuals (for example to community groups, sports associations, and service providers to run community or extra-curricular activities) we will ensure that appropriate arrangements are in place to keep students safe.

When services or activities are provided by us, under our own direct supervision or management, our own arrangements for child protection will apply. However, where services or activities are provided separately by another body this is not necessarily the case. We will therefore seek assurance that the body concerned has appropriate safeguarding and child protection policies and procedures in place including inspecting these; and ensure that there are arrangements in place to liaise with us on these matters where appropriate. We will also ensure safeguarding requirements are included in any transfer of control agreement (i.e., lease or hire agreement), as a condition of use and occupation of the premises; and that failure to comply with this may lead to termination of the agreement.

The guidance on [Keeping children safe in out-of-school settings](#) details the safeguarding arrangements that schools and colleges should expect these providers to have in place.

Absent and missing from education

We believe students being absent from education for prolonged periods and/or on repeat occasions can act as a vital warning sign to a range of safeguarding issues. Our response to persistently absent students and students missing education will support identifying such abuse, and in the case of absent students, helps prevent the risk of them becoming a student missing education in the future. This includes when problems are first emerging but also where students are already known to local authority social care and need a social worker (such as a student who is a child in need or who has a child protection plan, or is a looked after child), where being absent from education may increase known safeguarding risks within the family or in the community.

The recognised figure for severely absent is 50% or less and persistent absence is being less than 90%, although concerns may still be raised if above this.

We will require the behaviour and attendance lead to refer to and use the established protocol document of notification to the Local Authority, filling out the appropriate paperwork, policies and procedures for identifying pupils who are absent from education and policies and procedures for pupils on a modified timetable (available from Telford & Wrekin Council).

In addition to the above and where reasonably possible we will endeavour to hold more than one emergency contact number for each student. This goes beyond the legal minimum and is good practice to give us additional options to make contact with a responsible adult when a student is absent from education and poses a potential welfare/safeguarding concern. Where a student is on a Child Protection Plan has been missing from college for two consecutive days, we will notify the student's allocated social worker.

Where students leave the classroom or leave our grounds without permission, this is covered within our behaviour management policy and is also set against the backdrop of the legal framework of the Children Act 1989 s3 (5); 'Anyone who has care of a young person without parental responsibility may do what is "*reasonable*" in all the circumstances to safeguard and promote the young person's welfare. It is likely to be "*reasonable*" to inform the police, or children's services departments, and, if appropriate, their parents, of the young person's safety and whereabouts'. However, in principle, if a student runs out of class we will establish where he or she has gone. Staff will not run after them but will seek additional support. It is advisable to keep a watchful eye on any student who has taken themselves out of our building and possibly out of our grounds, unless this watchful eye provokes the student to run further. It is and will be a judgement call for staff to take what they feel is **reasonable** action in line with the advice above. If a student is no longer on the premises, we will contact parents in the first instance. If they are not contactable, we will inform the police that a student has left and is at risk.

Where young people have gone missing, we will follow the [West Mercia Pathway for Children who go Missing from Home, care or Education](#).

Students who need a social worker (Child 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 young person has a social worker, and the DSL will hold and use this information so that decisions can be made in the best interests of the student's safety, welfare and educational outcomes.

Where students need a social worker, this information will be used by the DSL (or deputies) to 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).

Students requiring mental health support

We recognise that we have an important role to play in supporting the mental health and wellbeing of our students.

Mental health concerns can, in some cases, be an indicator that a young person has suffered or is at risk of suffering abuse, neglect or exploitation. The governing body have put clear systems and processes in place for identifying possible mental health concerns, including routes to escalate and clear referral and accountability systems.

We will help prevent mental health concerns by promoting resilience as part of our integrated, whole setting approach to social and emotional wellbeing, which is tailored to the needs of our students.

Suicide Intervention

We accept and understand that thoughts of suicide are common and the leading cause of death in young people. As such, suicide intervention is our business too. We too work with our students and work in partnership to support anyone in our community that may have thoughts of suicide. We will follow our Suicide Intervention Policy to assist wherever we can in making those in our care as safe as is possible. We will also make staff aware of the following useful link in raising awareness of the subject http://zerosuicidealliance.com/

Looked after children and previously looked after children

We recognise that the most common reason for students becoming looked after is as a result of abuse and/or neglect. All staff at our setting have the knowledge and skills to keep looked after children safe. The DSL will hold the details of each student's social worker and the name of the virtual school head in the authority that looks after the student. They are responsible for ensuring all staff have the information they need in relation to a student's looked after status and the student's contact arrangements with birth parents or those with parental responsibility. They will also have information about the student's care arrangements and the levels of authority delegated to the carer by the authority looking after him/her.

We recognise a previously looked after child potentially remains vulnerable.

When dealing with looked after children and previously looked after children we will work with all agencies to take prompt action where necessary to safeguard these young people.

The designated teacher

The governing body appoint **Caroline Welson as the designated teacher** to work with the local authorities to promote the educational achievement of registered students who are looked after. With the commencement of sections 4 to 6 of the Children and Social Work Act 2017, designated teachers have responsibility for promoting the educational achievement of students who have left care through adoption, special guardianship or child arrangement orders or who were adopted from state care outside England and Wales. The designated teacher has appropriate training and relevant qualifications and experiences to fulfil this role.

We will follow the statutory guidance on The Roles and Responsibilities of the Designated Teacher.

Virtual school heads

As a maintained college, the designated teacher will work with the virtual school head to discuss how funding can be best used to support the progress of looked after children in college and meet the needs identified in the student's personal education plan. The designated teacher also works with the virtual school head to promote the educational achievement of previously looked after students.

As a college we have an appropriately trained teacher who will take the lead in working with the virtual school head. The teacher works with the virtual school head to discuss

how funding can be best used to support the progress of looked after students in the college and meet the needs identified in the student's personal education plan. The teacher also works with the virtual school head to promote the educational achievement of previously looked after students.

We will follow the statutory guidance on [Promoting the Education of Looked After Children](#).

The DSL, Headteacher, governors, SENCO and senior mental health lead will work with the virtual school head to promote educational attendance, attainment and progress of students with a social worker.

The virtual school head for Telford and Wrekin is: **Michelle Salter**.

Care leavers (post 16)

The DSL understands the ongoing responsibilities of local authorities to the young people who cease to be looked after and become care leavers. The DSL will hold details of the local authority Personal Advisor appointed to guide and support the care leaver, and will liaise with them as necessary regarding any issues of concern affecting the care leaver.

Students who have special educational needs and disabilities (SEND) or health issues

We recognise that students who have SEND or certain health or physical health conditions can face additional safeguarding challenges. We accept the additional barriers that can exist when recognising abuse and neglect of students in this group of young people. These can include:
- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the student's disability without further exploration;
- being more prone to peer group isolation than other students;
- the potential for student's with SEND being disproportionally impacted by behaviours such as bullying, without outwardly showing any signs; and
- communication barriers and difficulties in overcoming these barriers.

To help address these additional challenges we will provide extra pastoral support for students with SEND. For any reports of abuse involving students with SEND, the DSL (or DDSL) and the SENCO will liaise closely.

Students who are lesbian, gay, bi or trans (LGBT)

We recognise that the fact that a young person may be LGBT is not in itself an inherent risk factor for harm. However, students who are LGBT can be targeted by other students. In some cases, a student who is perceived by other students to be LGBT (whether they are or not) can be just as vulnerable as those who identify as LGBT.

Risks can be compounded where students who are LGBT lack a trusted adult with whom they can be open. All staff will endeavour to reduce the additional barriers faced and provide a safe space for them to speak out or share their concerns with members of staff.

Staff

All staff, supply staff, contractors and visitors, are informed of the name of the DSL and deputies and our procedures for protecting students, for example, how to report their concerns, suspicions and how to receive, record and report disclosures.

Staff should not accept personal invitation visits to the homes of students unless permission or instruction has been sought from the Principal and it is viewed as a professional appointment, for example, supporting education welfare issues etc. This should be viewed on a case-by-case basis. To support this, guidance from the Department of Education (September 2010) states 'Meetings with pupils away from the school premises should only be arranged with the specified approval of the head teacher and the prior permission of the pupil in question'. We accept this guidance from the Department of Education (September 2010) stating that in the case of private meetings; 'Staff and volunteers should be aware that private meetings with individual students could give cause for concern. There will be occasions when a confidential interview or a one-to-one meeting is necessary. Such interviews should be conducted in a room with visual access or an area which is likely to be frequented by other people. Another or adult should be present or nearby. Where conditions cannot apply, staff should ensure that another adult knows that the interview is taking place'.

Parents

Parents play an important role in protecting their young people from abuse. We are required to consider the safety of the student and should a concern arise, professional advice may be sought prior to contacting parents. If deemed appropriate, parents will be contacted, and we will continue to work with them to support the needs of their young person. Consent from the parents will be sought, although in exceptional circumstances and with the best interests of the young person being considered, this may be overridden.

We aim to help parents to understand their responsibility for the welfare of all students, which includes their duty to refer cases to social care services and/or police in the interests of the student. The governing body will include a child protection statement in our prospectus and all parents can view a copy of this policy.

Parents that have concerns regarding a member of staff can in the first instance raise those with the Principal. This may involve sharing those concerns with the relevant agencies. Where the parent has concerns regarding the Principal, the chair of governors should be consulted in the first instance.

Parents can liaise with Ofsted on such conduct issues or regulatory concerns, advice can be found on its website www.ofsted.gov.uk.

On occasions Ofsted may forward complaints that may raise a safeguarding concern about our college via Family Connect. In such instances, we will work with all agencies within Family Connect to clearly respond to Ofsted on a case by case basis.

Parents/Carers can also access Ofsted [Parent View](http://www.parentview.ofsted.gov.uk) which is an online survey questionnaire where parents can give their views. Where possible, this will be monitored regularly by the college to quickly address any concerns.

Parents can liaise with the Independent Schools Inspectorate (ISI) on such conduct issues or regulatory concerns, advice can be found on its website https://www.isi.net/parents-and-pupils/concerns-about-a-school or contact can be made direct to ISI, you can email concerns@isi.net or call 020 7600 0100 and ask to talk to an appropriate member of staff.

All complaints should be made via our complaint's procedures.

We will keep parents informed of all areas of safeguarding and child protection through the regular methods of communication.

We wish to make it clear to parents the standards, behaviour and respect we expect from them and conversely from us. If a parent's behaviour is a cause for concern, then we will ask them to leave our premises. We wish to make it clear that in serious cases, the Principal/local authority can/will notify parents in writing that their implied licence to be on our premises is temporarily revoked, subject to any representations that the parent may wish to make. This setting will give parents the opportunity to formally express their views on the decision to bar in writing and this will be reviewed via the complaints policy.

Our setting is private place. We will therefore act to ensure they remain a safe place for all. The public has no automatic right of entry.

We expect parents to talk to us about any concerns they have about care and education provided by us in the first instance. We urge all parents not to express these concerns on social media platforms, at least not before sharing these concerns with us first.

Changing in college

We consider arrangements for safe changing of students for physical education (PE). We will be guided by the NSPCC guidance Best Practice for PE Changing Rooms. This consideration will come under our duty and remit of health & safety and in the context of student's welfare. We follow the guidance and do what we need to do in relation to organising changing facilities for students; staff supervision; changing areas for students with additional needs; changing considerations for drama productions and using off-site changing rooms. NSPCC factsheet

Part three: Safer Recruitment

We will meet all requirements as set out in Part three: Safer recruitment KCISE.

Recruitment and selection process

We aim to create a culture that safeguards and promotes the welfare of all young people. As part of this culture, we will adopt robust recruitment procedures that help to deter and prevent people who are unsuitable to work with young people from applying for or securing employment, or volunteering opportunities in our setting.

We will ensure that **all** those involved with the recruitment and employment of staff to work with young people have received appropriate safer recruitment training. At least one person on each interview panel have completed safer recruitment training. These persons will complete the TWSP recommended Safer Recruitment Consortium training.

The following persons have completed safer recruitment training in our setting:
Sarah Jones
Caroline Welson
Sarah Corns
Tom James
Ben Hughes
Louise Pearce
Andie Cliff-Williams
Tom Benton
Victoria Nicholls
Emma Wade
Philip Brockhurst
Nikki Steadman

Pre-appointment vetting checks, regulated activity and recording information

We will abide by the legal requirements when appointing individuals to engage in regulated activity relating to students. We understand the importance of ensuring the correct pre-appointment checks are carried out. These checks will help us to identify whether a person may be unsuitable to work with young people (and in some cases is legally prohibited from working with young people and/or working as a teacher). We see this as part of our wider safeguarding regime which will carry on following appointment.

Other checks that may be necessary for staff, volunteers and others

We will carry out the checks that are necessary for individuals who have lived or worked outside the UK; agency and third-party staff; contractors; trainee teachers; volunteers; governors and proprietors. We will fulfil our responsibilities in relation to other settings, including alternative provision, work experience and host families.

Visitors

We have different types of visitors, those with a professional role, those connected with the building, grounds maintenance, student's relatives or other visitors attending an activity.

We will not request DBS checks or barred list checks, or ask to see existing DBS certificates, for visitors such as student's relatives or other visitors attending a sports day. The Principal will use their professional judgment about the need to escort or supervise such visitors.

For visitors who attend our setting in a professional capacity we will check their ID and seek assurance that the visitor has had the appropriate DBS check (or the visitor's employers have confirmed that their staff have appropriate checks). We will not ask to see DBS certificates.

Whilst external organisations can provide a varied and useful range of information, resources and speakers that can help us enrich student's education; careful consideration will be given to the suitability of any external organisations.

Private fostering

We recognise that a private fostering arrangement occurs when a young person under the age of 16 (under 18, if disabled) is provided with care and accommodation by a person who is not a parent, person with parental responsibility for them or a relative in their own home.

A student is not privately fostered if the person caring for and accommodating them has done so for less than 28 days and does not intend to do so for longer. Such arrangements may come to the attention of college staff through the normal course of their interaction, and promotion of learning activities, with students.

By law, a parent, private foster carer or other persons involved in making a private fostering arrangement must notify children's social care as soon as possible. If we become aware of a private fostering arrangement for a student that has not been notified to children's social care, we will encourage parents and private foster carers to notify them and will share information with children's social care as appropriate.

Our ongoing safeguarding of children and the legal reporting duties on us

We understand the importance of safeguarding vigilance beyond the recruitment process.

We believe safer recruitment is not just about carrying out the right DBS checks. Similarly safeguarding should not be limited to recruitment procedures. Good safeguarding requires a continuing commitment from our whole community to ensure the safety and welfare of students is embedded in all of our processes and procedures, and consequentially enshrined in our ethos.

We aim to promote continuous vigilance, maintaining an environment that deters and prevents abuse and challenges inappropriate behaviour.

We aim to create the right culture and environment so that our staff feel comfortable to discuss matters both within, and where it is appropriate, outside of the workplace, which may have implications for the safeguarding of students. This can help assist us as employers to support staff, where there is a need, and help them manage student's safety and welfare. Potentially providing them with information that will help them consider whether there are further measures or changes to procedures that need to be put in place to safeguard students in our care.

We will undertake our duty to refer to the Disclosure and Barring Service and to the Teaching Regulation Agency where required.