

## Safeguarding and Child Protection

### POLICY STATEMENT

- Oakwood Specialist College recognises our moral and statutory responsibility to safeguard and promote the welfare of all Learners and expects all Team Members to share this.
- We recognise that all children and vulnerable adults, regardless of age, disability, SEND, gender reassignment, race, religion or belief, sex, or sexual orientation have an equal right to protection from all types of harm or abuse.
- We endeavour to provide a safe and welcoming environment where everyone is respected and valued. We are alert to the signs of abuse, neglect and exploitation, and follow our procedures to ensure that Learners receive effective support, protection, and justice. We listen to our Learners and take what they tell us seriously. Learners are aware of the people they can talk to if they have a concern. When there are concerns for a Learner's welfare, we may need to share information and work in partnership with other agencies. This Safeguarding and Child Protection policy underpins and guides our safeguarding procedures and protocols.

#### Document Control

|                   |                |                      |                                                 |
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# 1. Principles of Safeguarding & Terminology

## 1.1 Policy Principles

- 1.1.1 It is the responsibility of everyone at Oakwood Specialist College to protect children and adults at risk of abuse or neglect. Team Members should not assume that someone else will take action.
- 1.1.2 Team Members must always act in the interest of the child or adult at risk.
- 1.1.3 Team Members must ensure they read Part 1 and Annex B of 'Keeping Children Safe in Education 2025'.
- 1.1.4 The General Data Protection Regulation (GDPR) and Data Protection Act 2023 do not prevent, or limit, the sharing of information for the purposes of keeping people safe.
- 1.1.5 Information can be shared without consent to keep an individual at risk safe from neglect or physical, emotional, or mental harm, or if it is protecting their physical, mental, or emotional wellbeing.
- 1.1.6 Where possible, consent should be sought from the individual before information is shared.

## 1.2 Terminology

- 1.2.1 A child is a person who is under 18 years of age.
- 1.2.2 Safeguarding and promoting the welfare of children is defined as:
  - providing help and support to meet the needs of children as soon as problems emerge.
  - protecting children from maltreatment, whether that is within or outside the home, including online.
  - preventing impairment of children's mental and physical health or development.
  - ensuring that children grow up in circumstances consistent with the provision of safe and effective care.
  - promoting the upbringing of children with their birth parents, or otherwise their family network through a kinship care arrangement, whenever possible and where this is in the best interests of the children.
  - taking action to enable all children to have the best outcomes in line with the outcomes set out in the Children's Social Care National Framework.

### (Working Together to Safeguard Children)

- 1.2.3 An adult is a person aged 18 years or over.
- 1.2.4 Safeguarding means protecting an adult's right to live in safety, free from abuse and neglect. Safeguarding duties apply to an adult who:

- has needs for care and support (whether or not the local authority is meeting any of these needs)
- is experiencing, or at risk of, abuse or neglect and as a result of these care and support needs is unable to protect themselves from either the risk of, or the experience of abuse or neglect.

(Department of Health - Care Act 2014 Care and Support Statutory Guidance)

- 1.2.5 Child Protection refers to the processes undertaken to protect children who have been identified as suffering or being at risk of suffering significant harm.
- 1.2.6 Team Members refers to all those working for or on behalf of the College, full time, or part time, temporary or permanent, in either a paid or voluntary capacity.
- 1.2.7 Parents refers to birth parents and other adults who are in a parenting role, for example stepparents, foster carers, and adoptive parents.
- 1.2.8 The Designated Safeguarding Lead (DSL) is the first point of contact for any member of the college Team who has a concern about the safety and wellbeing of a child, young person, or vulnerable adult at risk.
- 1.2.9 A Deputy Designated Safeguarding Lead (DDSL) is the first point of contact in the absence of the DSL to avoid any unnecessary delays in responding to a child/vulnerable adult's needs.
- 1.2.10 Prevent refers to the Government's strategy to prevent young people and vulnerable adults becoming radicalised.
- 1.2.11 The Prevent Single Point of Contact (SPoC) is the person identified in the college as the point of contact for all Prevent related incidents and concerns.
- 1.2.12 Safeguarding Team refers to the team of trained Team Members who support the DSL and DDSLs in safeguarding and child protection across the whole college.
- 1.2.13 The Designated Person for Looked After and Previously Looked After Children is the person who has responsibility for looked after or previously looked after children.

## 2. Roles & Responsibilities

### 2.1 College Safeguarding Leadership

- 2.1.1 The College Principal is the nominated Senior leader with responsibility for Safeguarding. They must ensure that a Designated Safeguarding Lead is appointed for the College and that this individual has the appropriate training, support, and resource to fulfil this role effectively.
- 2.1.2 The College has a Designated Safeguarding Lead (DSL) and Deputy Designated Safeguarding Leads (DDSL) who are supported by a Safeguarding team. This team are responsible for the monitoring of child protection and safeguarding of Learners within the college. They act as the key people for Team Members to discuss concerns with and liaise with other agencies and professionals.
- 2.1.3 Each campus has a Campus Lead for safeguarding DDSL who is part of the College Safeguarding Team. In addition, safeguarding officers work on each site to promote safeguarding policy and provide additional support and expertise for Team Members. All members of the safeguarding team wear an orange safeguarding lanyard for easy recognition.

### 2.2 Safeguarding Team

|                                                                                 |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
|---------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| The Designated Safeguarding Lead (DSL) for Safeguarding and Child Protection is | Andy Baker<br>Email: <a href="mailto:abaker@oakwoodcourt.ac.uk">abaker@oakwoodcourt.ac.uk</a><br>Tel: 07881 766139                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| The Deputy Designated Safeguarding Leads (DDSL) are                             | Sam Fox<br>Email: <a href="mailto:sfox@oakwoodcourt.ac.uk">sfox@oakwoodcourt.ac.uk</a><br>Tel: 07753498532<br><br>Kat Ingle<br>Email: <a href="mailto:kingle@oakwoodcourt.ac.uk">kingle@oakwoodcourt.ac.uk</a><br>Tel: 0330 135 8 172<br><br>Julia McCarthy<br>Email: <a href="mailto:jmcarthy@oakwoodcourt.ac.uk">jmcarthy@oakwoodcourt.ac.uk</a><br>Tel: 07896 496 285<br><br>Kirsty Winfield<br>Email: <a href="mailto:kwinfield@oakwoodcourt.ac.uk">kwinfield@oakwoodcourt.ac.uk</a><br>Tel: 0330 135 8 171<br><br>Alice Parrington<br>Email: <a href="mailto:alice.parrington@oakwoodcourt.ac.uk">alice.parrington@oakwoodcourt.ac.uk</a><br>Tel: 0330 135 8 172<br><br>Rikki Bache<br>Email: <a href="mailto:rbache@oakwoodcourt.ac.uk">rbache@oakwoodcourt.ac.uk</a><br>Tel: 0330 135 8 170 |
| The Single Point of Contact (SPOC) for Prevent is                               | Abbie Heard<br>Email: <a href="mailto:ahheard@plcl.org.uk">ahheard@plcl.org.uk</a><br>Tel: 07741903286                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |

|                                                               |                                                                                                                                |
|---------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------|
| Head of Safeguarding/Quality                                  | Wanda Green<br>Email: <a href="mailto:wgreen@plcl.org">wgreen@plcl.org</a><br>Tel: 07872601205                                 |
| The Principal is                                              | Esther Williams<br>Email: <a href="mailto:ewilliams@oakwoodcourt.ac.uk">ewilliams@oakwoodcourt.ac.uk</a><br>Tel: 0330 135 8170 |
| The Senior Leader for education at Phoenix learning & Care is | Darren Jackson<br>Email: <a href="mailto:djackson@plcl.org">djackson@plcl.org</a><br>Tel: 07587747868                          |

## **2.3 Role of the Designated Safeguarding Lead (DSL)**

- 2.3.1 The Designated Safeguarding Lead has responsibility for safeguarding and child protection (including online safety). They will ensure that the Deputy Designated Safeguarding Lead (DSL) for each campus has completed the relevant training for each Local Authority, as appropriate. Their role is clearly defined in the DSL job description. Their additional responsibilities include providing advice and support to other Team Members on safeguarding and child protection matters, taking part in strategy discussions and inter-agency meetings, and/or supporting other Team Members to do so.

## **2.4 Role of the Deputy Designated Safeguarding Lead (DDSL)**

- 2.4.1 The Deputy Designated Safeguarding Lead should be trained to the same standard as the Designated Safeguarding Lead and the role should be explicit in their job description. Whilst the activities of the Designated Safeguarding lead can be delegated to appropriately trained deputies, the ultimate lead responsibility for child protection and adult safeguarding, as set out above, remains with the Designated Safeguarding Lead, this lead responsibility should not be delegated. In the event of the long-term absence of the DSL, a Deputy will assume all of the functions listed in the DSL job description.

## **2.5 Role of the Governance and Oversight Team**

- 2.5.1 The Governance and Oversight Team are responsible for ensuring that the following duties are followed.
- The College appoints a DSL for Safeguarding who is a member of the College leadership team and who has undertaken training in inter-agency working, in addition to basic safeguarding and child-protection training.
  - The DSL role is explicit in the role holder's job description.
  - The College has a Safeguarding and Child Protection policy and relevant procedures in place, including a Team Members code of conduct, that is consistent with statutory requirements, reviewed annually and made available publicly on the College's website or by other means.
  - Has procedures for dealing with allegations of abuse made against Team Members including allegations made against the Principal or Chair of Governors or another Governor and allegations against other young people.
  - Follows safer recruitment procedures that include statutory checks on Team Members suitability to work with children and disqualification by association regulations.
  - There is a training strategy that ensures all Team Members, including the Principal, receive information about the College's safeguarding arrangements, Team Members code of conduct and the role of the DSL on induction, and appropriate child protection training, which is regularly updated in line with any statutory requirements.

- The DSL receives child protection and safeguarding refresher training at two-yearly intervals and adult safeguarding refresher training every 3 years
- Ensures that all Team Members, including temporary Team Members and volunteers, are provided with access to the College's Safeguarding and child protection policy, Team Members code of conduct and KCSiE Part 1 and Annex B.
- ensures that the college contributes to early help arrangements and inter agency working and plans.
- considers how Learners may be taught about safeguarding, including radicalisation and digital safety as part of a broad and balanced curriculum.

2.5.2 The Governance and Oversight Team will nominate the Operations Director for Education to be responsible for liaising with the Local Authority and other agencies in the event of an allegation being made against the Principal.

## **2.6 Role of the Principal**

2.6.1 The Principal is ultimately responsible for the safeguarding of children and Adults at Risk at the College. They will uphold this responsibility by:

- ensuring that the safeguarding and child protection policy and procedures are implemented and followed by all Team Members, and that an open and positive culture of safeguarding is promoted.
- allocate sufficient time, training, support, and resources, including cover arrangements, when necessary, to enable the DSL and Deputies to carry out their roles effectively, including attendance at strategy discussions and other necessary meetings.
- ensure that all Team Members feel able to raise concerns about poor or unsafe practice and that such concerns are handled sensitively and in accordance with the whistle blowing procedures.
- ensure that Learners are provided with opportunities throughout the curriculum to learn about safeguarding, including keeping themselves safe online.
- liaise with the Designated Safeguarding Lead, Operations Director for Education and People Services, where an allegation is made against a Team Member.
- ensure that anyone who has harmed or may pose a risk to a child or vulnerable adult is referred to the Disclosure and Barring Service.
- Ensure that procedures for whistleblowing, allegation management and low-level concerns are followed.

## **2.7 Role of all Team Members**

2.7.1 Roles and responsibilities will include:

- Maintaining an attitude of 'it could happen here' where safeguarding is concerned.

- Identifying concerns early, provide help for Learners, promote Learners' welfare, and prevent concerns from escalating.
- Knowing what to do if a Learner tells them they are being abused, exploited, or neglected.
- Being able to reassure victims that they are being taken seriously and that they will be supported and kept safe.
- Recognising and providing strategies to overcome the barriers for Learners when wanting to make a disclosure (verbal or non-verbal)
- Identifying children who may benefit from early help, (providing support as soon as a problem emerges) and the part they play in these support plans.
- Raising any concerns for a Learner following the college safeguarding policies and procedures
- Being aware of local authority referral processes for the campus location.
- Being aware of systems within the college which support safeguarding e.g., safeguarding policy, behaviour policy, code of conduct, CME, online filtering, and monitoring
- Attending regular adult and children's safeguarding and child protection training.

### **3. Recognising and Responding to Safeguarding Concerns**

#### **3.1 Recognising**

- 3.1.1 Team Members should always maintain an attitude of “It could happen here”. We also recognise that abuse, neglect, exploitation and safeguarding issues are complex and are rarely standalone events that can be covered by one definition or label. Team Members are aware that in most cases multiple issues will overlap one another.
- 3.1.2 Information about the different types of abuse and indicators that a child or young person is being abused are detailed in Keeping Children Safe in Education (KCSiE). A summary of the indicators of abuse, neglect and exploitation can be found below, with further information in Appendix 1.

#### **3.2 Responding**

- 3.2.1 Do not promise to keep it a secret.
- 3.2.2 Do not react – try not to show shock, disgust, or disbelief.
- 3.2.3 Listen patiently and closely.
- 3.2.4 Only seek to clarify essentials – what, where, when, who and ensure no leading questions are used and no conclusions made.
- 3.2.5 Do not question the alleged victim about the incident – do not ask leading questions (any further questioning by Team Member could affect the validity of any statement collected by police at a later date)
- 3.2.6 Do not make promises about the future or statements that are incorrect.

#### **3.3 Reporting**

- 3.3.1 It is the responsibility of Team Members to report all safeguarding concerns and not to decide whether it is or is not abuse. The need to protect the child or adult at risk overrides any concerns about “false allegations”; even if you think a disclosure or allegation may be untrue you must still report it.
- 3.3.2 Any concerns regarding a child must be reported promptly in accordance with the college's safeguarding policies and procedures. If there is an immediate risk of harm, action should be taken without delay. Failure to follow these procedures may result in disciplinary action.
- 3.3.3 Abuse is usually discovered in three ways:
- The Learner makes a disclosure or allegation to someone that abuse has or may have occurred.
  - Someone sees the abuse occur.
  - Someone identifies signs and symptoms that may indicate abuse.
- 3.3.4 These principles are to be followed in all cases of disclosure or alleged abuse.

#### **3.4 Assist**

- 3.4.1 If necessary, ensure the person receives medical treatment.

- 3.4.2 Seek to ensure the persons safety.
- 3.4.3 Where appropriate encourage and allow the individual to take any next steps on their own.
- 3.4.4 Provide appropriate support to the victims needs and agree a course of action.

### **3.5 Preserve**

- 3.5.1 Do not confront the alleged perpetrator.
- 3.5.2 If the abuse happened recently do not allow any access to any place where the abuse may have occurred.
- 3.5.3 Look after any items given to you – place them in a clean plastic bag.

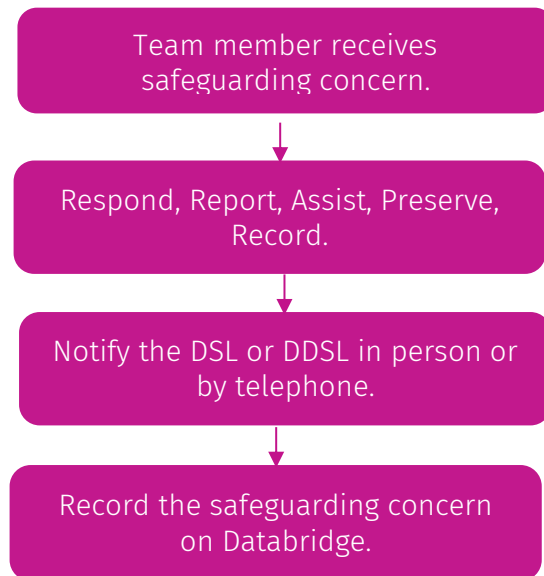
### **3.6 Record**

- 3.6.1 Record what you see and what you are told as soon as possible or during the disclosure if appropriate – include the person's wishes about what action to take.
- 3.6.2 Use the alleged victim's own words.
- 3.6.3 Cross out mistakes do not use correction fluid.
- 3.6.4 All notes should be timed, dated, and signed, with name printed alongside the signature, by the member of Team Member making the notes.
- 3.6.5 All records should then be logged electronically using Databridge.

### **3.7 In the case of a disclosure:**

- 3.7.1 Report verbally to the Designated Safeguarding Lead or Deputy Designated Safeguarding Lead as soon as possible and definitely within 1 hour if there are safety concerns for the Child or Adult at Risk
- 3.7.2 In the absence of the Designated Safeguarding Lead or a Deputy Designated Safeguarding Lead, report the matter verbally to a College senior manager immediately if you believe the senior manager may need to take some action.
- 3.7.3 Complete a Safeguarding concern event log on Databridge.
- 3.7.4 Record all notes or other record made of the disclosure within the Safeguarding Concern event log on Databridge or ensure this is communicated securely to the designated Safeguarding Lead or a Deputy Designated Safeguarding Lead.

### 3.8 Disclosure flow chart & Safeguarding referrals by campus



3.8.1 When a disclosure or allegation of abuse or cause for concern is reported within Oakwood Specialist College, the Designated Safeguarding Lead will:

- Consider if an alert should be made to the appropriate Safeguarding Team or relevant Police Force.
- Report any concern which could potentially lead to wilful neglect or ill treatment of someone who lacks capacity to the appropriate Safeguarding Team and/or relevant Police Force This includes all concerns regarding care and support need.
- Be directed by and work with the appropriate Local Authority Safeguarding Team or relevant Police Force to ensure an open and thorough investigation of the disclosure or allegation.

3.8.2 The ‘appropriate Local Authority Safeguarding Team’ or ‘relevant Police Force’ is the service responsible for the geographical area in which the alleged or suspected abuse occurred.

Dawlish Campus: Devon and Cornwall Police <https://www.devon-cornwall.police.uk/>  
 Torpoint Campus: Devon and Cornwall Police <https://www.devon-cornwall.police.uk/>  
 Yate Campus: Avon and Somerset Police <https://www.avonandsomerset.police.uk/>

3.8.3 When receiving a concern about a Team Member, and the victim is aged under 18 the DSL should contact the relevant Local Authority Designated Officer (LADO) for that campus or where the risk is located.

**Dawlish campus:**

**Website:** <https://www.devon.gov.uk/educationandfamilies/child-protection/managing-allegations-against-adults-working-with-children/>

**Telephone number:** 01392 384 964

**Email:** [childsc.localauthoritydesignatedofficersecure-mailbox@devon.gov.uk](mailto:childsc.localauthoritydesignatedofficersecure-mailbox@devon.gov.uk)

|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Notification form: <a href="https://services.devon.gov.uk/web/lado/form">https://services.devon.gov.uk/web/lado/form</a>                                                                                                                                                                                                                                                                                                                                                            |
| <b>Torpoint Campus:</b><br>Website: <a href="https://www.cornwall.gov.uk/health-and-social-care/childrens-services/child-protection-and-safeguarding/allegations-against-people-who-work-with-children/">https://www.cornwall.gov.uk/health-and-social-care/childrens-services/child-protection-and-safeguarding/allegations-against-people-who-work-with-children/</a><br>Telephone number: 01872 326 536<br>Email: <a href="mailto:lado@cornwall.gov.uk">lado@cornwall.gov.uk</a> |
| <b>Yate Campus:</b><br>Website: <a href="http://sites.southglos.gov.uk/safeguarding/children/i-am-a-professional/managing-allegations/">http://sites.southglos.gov.uk/safeguarding/children/i-am-a-professional/managing-allegations/</a><br>Telephone number: 01454 868 508<br>Email: <a href="mailto:lado@southglos.gov.uk">lado@southglos.gov.uk</a>                                                                                                                             |

- 3.8.4 When receiving a concern about a child and they have a social worker, the DSL should report the concern to the social worker.
- 3.8.5 When receiving a concern about a child who does not have a social worker, a referral should be made to the safeguarding team within the local authority that the campus is located (or where the alleged abuse is thought to have taken place, should this be a different local authority)

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| <b>Dawlish Campus: MASH</b><br>Website: <a href="https://www.devon.gov.uk/educationandfamilies/child-protection/">https://www.devon.gov.uk/educationandfamilies/child-protection/</a><br><b>Telephone number:</b> <a href="tel:03451551071">0345 155 1071</a><br><b>Out of Hours telephone number:</b> 0345 6000 388<br><b>Email:</b> <a href="mailto:mashsecure@devon.gov.uk">mashsecure@devon.gov.uk</a> <b>Request for support form:</b><br><a href="https://devoncountycouncil.outsystemsenterprise.com/MASH/homepage">https://devoncountycouncil.outsystemsenterprise.com/MASH/homepage</a>                                                                                                                                    |
| <b>Torpoint Campus: MARU</b><br><b>Website:</b> <a href="https://www.cornwall.gov.uk/health-and-social-care/childrens-services/child-protection-and-safeguarding/">https://www.cornwall.gov.uk/health-and-social-care/childrens-services/child-protection-and-safeguarding/</a><br><b>Telephone number:</b> 0300 1231 116<br><b>Out of hours telephone number:</b> 01208 251 300<br><b>email:</b> <a href="mailto:multiagencyreferralunit@cornwall.gov.uk">multiagencyreferralunit@cornwall.gov.uk</a><br><b>Online Referral Form:</b><br><a href="https://cornwallmosaicchildportal.cornwall.gov.uk/s4s/FormDetails/FillForm?formId=416">https://cornwallmosaicchildportal.cornwall.gov.uk/s4s/FormDetails/FillForm?formId=416</a> |
| <b>Yate Campus:</b><br>Website: <a href="http://sites.southglos.gov.uk/safeguarding/">http://sites.southglos.gov.uk/safeguarding/</a><br><b>Telephone number:</b> 01454 866000 <b>Out of hours telephone number:</b> 01454 615 165<br><b>Email:</b> <a href="mailto:accessandresponse@southglos.gov.uk">accessandresponse@southglos.gov.uk</a>                                                                                                                                                                                                                                                                                                                                                                                      |

- 3.8.6 When receiving a concern about an adult and they have a social worker, the DSL should report the concern to the social worker.
- 3.8.7 When receiving a concern about an adult who does not have a social worker, a referral should be made to the safeguarding team within the local authority that the campus is located. (or where the alleged abuse is thought to have taken place, should this be a different local authority)

**Dawlish Campus:**

**Website:** <https://www.devonsafeguardingadultspartnership.org.uk/>

**Telephone number:** [0345 1551 007](tel:03451551007)

**Out of Hours:** [0345 6000 388](tel:03456000388)

**Email:** [csc.caredirect@devon.gov.uk](mailto:csc.caredirect@devon.gov.uk)

**Torpoint Campus:**

**Website:** <https://www.cornwall.gov.uk/safeguardingadults>

**Telephone number:** 0300 1234 131

Out of Hours telephone number: 01208 251300

**Email:** [accessteam.referral@cornwall.gov.uk](mailto:accessteam.referral@cornwall.gov.uk)

**Yate Campus:**

**Website:** <http://sites.southglos.gov.uk/safeguarding/adults/>

**Telephone number:** 01454 868007

Out of hours telephone number: 01454 615 165

**Key contacts**

Police – 999 (emergency) / 101 (non-emergency)

Disclosure and Barring Service - 0300 0200 190 - [customerservices@dbb.gsi.gov.uk](mailto:customerservices@dbb.gsi.gov.uk)

## 4. Allegations against Team Members

- 4.1.1 All Team Members should take care not to place themselves in a vulnerable position with a Learner. It is always advisable for interviews or work with individual Learners to be conducted in view of other Team Members. Guidance about conduct and safe practice, including safe use of mobile phones by Team Members and volunteers will be given at induction.
- 4.1.2 Suspension of the member of the team, excluding the Principal, against whom an allegation has been made, needs careful consideration, and the Principal will seek the advice of the LADO (if the Learner is aged under 18), the Operations Director for Education and People Services in making this decision.
- 4.1.3 Team Members, Parents/Carers and the Governance and Oversight Team are reminded that publication of material that may lead to the identification of a Team Member who is the subject of an allegation is prohibited by law. Publication includes verbal conversations or writing including content placed on social media sites.

### 4.2 Procedure for Senior Manager / DSL with Safeguarding Responsibilities in the case of an allegation or concern about the behaviour of a Team Member

- 4.2.1 Allegations Management Procedures must take place where an allegation or concern is made against a Team Member, Visitor or Volunteer, stating that they have:
- behaved in a way that has harmed a Learner or may have harmed a Learner.
  - possibly committed a criminal offence against or related to a Learner.
  - behaved towards a Learner or Learners in a way that indicates that person will pose a risk of harm if they work regularly or closely with children or Adults at Risk, and/or.
  - behaved or may have behaved in a way that indicates that they may not be suitable to work with children or Adults at Risk
- 4.2.2 Regardless of where the alleged abuse took place; the Allegations Management Procedures must be implemented. Note: No investigation should take place until feedback has been received from the LADO/Safeguarding. If it is decided by the Local Authority Designated Officer (LADO) or Adult Safeguarding Team that a Strategy Meeting is to be called, the college should not carry out an investigation until the Strategy Meeting has taken place.
- 4.2.3 The DSL will notify the Principal, or if the complaint is against the Principal, the Operations Director (Education) must be contacted immediately.
- 4.2.4 If a serious criminal offence is suspected, the police should be informed.
- 4.2.5 A written record must be completed.
- 4.2.6 The Local Authority Designated Office (LADO) and/or Adult Safeguarding Team must be informed
- 4.2.7 The advice given by the LADO or Adult Safeguarding Team must be followed, and the LADO/Adult Safeguarding Team will decide if the allegation meets the criteria for a strategy meeting based on whether the member of the team has:

- Behaved in a way that has harmed or may have harmed a Learner.
- Possibly committed a criminal offence against or related to a Learner.
- behaved towards a Learner or Learners in a way that indicates that person will pose a risk of harm if they work regularly or closely with children or Adults at Risk, and/or.
- behaved or may have behaved in a way that indicates that they may not be suitable to work with children or Adults at Risk

4.2.8 Where an allegation is made against another person that is not a Team Member, volunteer, or contractor at the College, but who the college has reason to believe is a person who works or is a volunteer with children or Adults at Risk then the college will inform the LADO or Adult Safeguarding Team.

#### **4.3 Disciplinary Procedure in the event of an Allegation**

4.3.1 The Principal will take advice from the LADO or Adult Safeguarding Team, however, where there is reasonable suspicion that the allegation is serious and the outcome of an investigation could result in the action being gross misconduct, the College will consider suspending the Team Member in accordance with its disciplinary procedures.

4.3.2 Team member suspension is not in itself a disciplinary action and will be used for the following reasons:

- To protect the Learner or others from possible further abuse.
- To allow a full investigation without the danger of influence by the Team Member.
- To protect the Team Member from further allegations.

4.3.3 Oakwood Specialist College recognises that this can be a very uncomfortable experience for the Team Member involved and will seek to support that Team Member either through the People Services department, Employee Assistance programme (EAP) or if appropriate an external agency.

4.3.4 Team Members are reminded that a Team Member who is suspended is not guilty of anything at that stage, neither should they discuss the issues with others in the Organisation. This should be respected and Team Members returning from suspension should be supported and treated professionally.

4.3.5 The College has a statutory duty to refer the individual to the Disclosure and Barring Service where it withdraws permission for an individual to engage in regulated activity, or would have done so had that individual not resigned, retired, been made redundant or been transferred to a position which is not regulated activity because they think that the individual has engaged in relevant conduct, satisfied the Harm Test or received a caution or conviction for a relevant offence.

4.3.6 The Director of Operations (Education) will be responsible for ensuring the College meets this duty.

#### **4.4 Team Members with responsibility for Allegations Management**

- Designated Safeguarding Lead
- College Principal
- Operations Director (Education)
- People Director

## **5. Safeguarding Procedures**

### **5.1 Safer Recruitment**

- 5.1.1 The College complies with the requirements of Keeping Children Safe in Education by carrying out the required checks and verifying the applicant's identity, qualifications and work history.
- 5.1.2 The College's Recruitment procedures set out the process in full. At least one member of each recruitment panel will have attended safer recruitment training.
- 5.1.3 All relevant Team Members are made aware of the disqualification by association legislation and their obligations to disclose relevant information to the College.
- 5.1.4 The College obtains written confirmation from supply agencies or third-party organisations that agency Team Members or other individuals who may work in the college have been appropriately checked.
- 5.1.5 The College maintains a single central record of recruitment checks undertaken for all Team Members including volunteers. The Governance and Oversight Team will undergo checks commensurate with their work in the College, their contact with Learners and the supervision provided to them. Under no circumstances must a visitor who has not been appropriately checked be left unsupervised.
- 5.1.6 The College checks the identity of all contractors working on site and requests DBS with barred list checks where required by statutory guidance.

### **5.2 Security**

- 5.2.1 All visitors to the College, including contractors, are asked to sign in and are given a coloured lanyard, which confirms they have permission to be on site. Parents or Carers who are simply delivering or collecting their young person from reception or college car parks do not need to sign in, unless they are going into buildings.
- 5.2.2 All visitors are expected to observe the College's safeguarding and health and safety regulations and will be made aware of the College's safeguarding statement and information on arrival. Copies are in all receptions.

### **5.3 Physical Intervention**

- 5.3.1 We acknowledge that Team Members must only ever use physical intervention as a last resort, when a Learner is endangering themselves or others, and that at all times it must be the minimal force necessary to prevent injury to themselves or another person.
- 5.3.2 Such events should be recorded and signed by a witness.
- 5.3.3 Team Members who are likely to need to use physical intervention will be appropriately trained.

### **5.4 Confidentiality, Sharing Information and GDPR**

- 5.4.1 All Team Members will understand that safeguarding and child protection warrant a high level of confidentiality, not only out of respect for the Learner and Team Members involved, but also to ensure that information being released into the public domain does not compromise evidence.

- 5.4.2 Team Members should be proactive in sharing information as early as possible to help identify, assess, and respond to risks or concerns about the safety and welfare of Learners, whether this is when problems are first emerging, or where a Learner is already known to local authority social care.
- 5.4.3 Team Members should only discuss concerns with the DSL, DDSLs, Principal, or Operations Director (Education) (depending on who is the subject of the concern). That person will then decide who else needs to have the information and they will disseminate it on a 'need-to-know' basis.
- 5.4.4 Child protection information will be stored and handled in line with the Data Protection Act 2023 and HM Government Information Sharing and Advice for practitioners providing safeguarding services to children, young people, Parents and Carers, July 2018.
- 5.4.5 At the point a Learner formally transfers to a new setting, their safeguarding file will be transferred securely in line with GDPR expectations as soon as possible but within 5 working days.
- 5.4.6 Information sharing is guided by the following principles:
- necessary and proportionate
  - relevant
  - adequate
  - accurate
  - timely
  - secure
- 5.4.7 The UK Data Protection Act 2023 is supplementary to the General Data Protection Regulation 2016 (the GDPR). Fears about sharing information cannot be allowed to stand in the way of the need to promote the welfare and protect the safety of children and vulnerable adults. Oakwood Specialist College will ensure that images of Learners used within publications, publicity and on the website has written parental and Learner consent prior to any images being taken and used. This consent will be obtained in line with the college's annual data collection process.

## **5.5 Whistleblowing**

- 5.5.1 We recognise that Learners cannot be expected to raise concerns in an environment where Team Members fail to do so.
- 5.5.2 All Team Members should be aware of their duty to raise concerns, where they exist, about the management of child protection and safeguarding, which may include the attitude or actions of colleagues, poor or unsafe practice and potential failures in the College's safeguarding arrangements. If it becomes necessary to consult outside the College, they should speak in the first instance, to the relevant Safeguarding board for the campus following the Whistleblowing Policy.
- 5.5.3 The NSPCC whistleblowing helpline is available for Team Members who do not feel able to raise concerns regarding child protection failures internally. Team Members can call: 0800 028 0285 line is available from 8:00 AM to 8:00 PM, Monday to Friday and email: [help@nspcc.org.uk](mailto:help@nspcc.org.uk)

- 5.5.4 Whistleblowing re the Principal should be made to the Operations Director (Education) whose contact details are readily available to Team Members.

## **5.6 Mental Capacity, Decision Making and Deprivation of Liberty**

- 5.6.1 The college will adhere and promote the governing principles of the mental capacity act as follows:

- Every adult has the right to make his or her own decision and must be presumed to have capacity unless is proved otherwise.
- People should be supported as much as possible to make a decision before anyone concludes that they cannot make their own decision.
- People have the right to make what others may regard as an unwise decision.
- Anything done for or on behalf of a person who lacks mental capacity to make a specific decision at a particular time must be done in their best interests.
- Anything done for, or on behalf of people without capacity should be the least restrictive of their basic rights and freedoms – the least restrictive option.

## **5.7 Work Experience:**

- 5.7.1 The College follows the necessary processes to safeguard Learners when they are undertaking work experience/voluntary work, which is in accordance with the statutory guidance: Keeping Children Safe in Education.

## **6. Appendix 1: Categories and Signs of Abuse (Children)**

### **6.1 Categories of Abuse**

- Physical Abuse
- Emotional Abuse (including Domestic Abuse)
- Sexual Abuse (including child sexual exploitation)
- Neglect

### **6.2 Signs of Abuse in Children:**

6.2.1 The following non-specific signs may indicate something is wrong:

- Significant change in behaviour
- Extreme anger or sadness
- Aggressive and attention-needing behaviour
- Suspicious bruises with unsatisfactory explanations
- Lack of self-esteem
- Self-injury
- Depression and/or anxiousness
- Inappropriate sexual behaviour
- Child Sexual Exploitation
- Criminality
- Substance abuse
- Mental health problems
- Poor attendance

### **6.3 Risk Indicators**

- The factors described in this section are frequently found in cases of child abuse. Their presence is not proof that abuse has occurred, but:
- Must be regarded as indicators of the possibility of significant harm.
- Justifies the need for careful assessment and discussion with designated / named / lead person, manager, (or in the absence of all those individuals, an experienced colleague).

- May require consultation with and / or referral to Children's Services. The absence of such indicators does not mean that abuse or neglect has not occurred.
- In an abusive relationship the child or young person may:
- Act in a way that is inappropriate to her/his age and development (though full account needs to be taken of different patterns of development and different ethnic groups).

6.3.1 The parent or carer may:

- Persistently avoid child health promotion services and treatment of the child or young person's episodic illnesses.
- Have unrealistic expectations of the child or young person.
- Frequently complain about/to the child or young person and may fail to provide attention or praise (high criticism/low warmth environment).
- Be absent or misusing substances.
- Persistently refuse to allow access on home visits.
- Be involved in domestic abuse.

6.3.2 Team Members should be aware of the potential risk to children when individuals, previously known or suspected to have abused children, move into the household.

## **6.4 Recognising Physical Abuse**

6.4.1 The following are often regarded as indicators of concern:

- An explanation which is inconsistent with an injury
- Several different explanations provided for an injury.
- Unexplained delay in seeking treatment.
- The Parents/Carers are uninterested or undisturbed by an accident or injury.
- Parents/Carers are absent without good reason when their child is presented for treatment.
- Repeated presentation of minor injuries (which may represent a "cry for help" and if ignored could lead to a more serious injury)
- Family use of different doctors and A&E departments
- Reluctance to give information or mention previous injuries.

## **6.5 Bruising**

6.5.1 Children and young people can have accidental bruising, but the following must be considered as nonaccidental unless there is evidence, or an adequate explanation provided:

- Two simultaneous bruised eyes, without bruising to the forehead, (rarely accidental, though a single bruised eye can be accidental or abusive)
- Repeated or multiple bruising on the head or on sites unlikely to be injured accidentally.
- Variation in colour possibly indicating injuries caused at different times.
- The outline of an object used e.g., belt marks, handprints, or a hairbrush.
- Bruising or tears around, or behind, the earlobe/s indicating injury by pulling or twisting
- Bruising around the face
- Bruising on the arms, buttocks and thighs may be an indicator of sexual abuse.

## **6.6 Burns and Scalds**

6.6.1 It can be difficult to distinguish between accidental and non-accidental burns and scalds and will always require experienced medical opinion. Any burn with a clear outline may be suspicious e.g.:

- Circular burns from cigarettes (but may be friction burns if along the bony protuberance of the spine)
- Linear burns from hot metal rods or electrical fire elements
- Burns of uniform depth over a large area
- Scalds that have a line indicating immersion or poured liquid (a person getting into hot water is his/her own accord will struggle to get out and cause splash marks)
- Old scars indicating previous burns/scalds which did not have appropriate treatment or adequate explanation.

## **6.7 Fractures**

6.7.1 Fractures may cause pain, swelling and discolouration over a bone or joint. Non-mobile people rarely sustain fractures. There are grounds for concern if:

- The history provided is vague, non-existent, or inconsistent with the fracture type.
- There are associated old fractures.

- Medical attention is sought after a period of delay when the fracture has caused symptoms such as swelling, pain or loss of movement.

## **6.8 Scars**

- 6.8.1 A large number of scars or scars of different sizes or ages, or on different parts of the body, may suggest abuse.

## **6.9 Recognising Emotional Abuse**

- Developmental delay
- Abnormal attachment between a child/young person and parent/carer e.g., anxious, indiscriminate, or no attachment.
- Aggressive behaviour towards others
- Scapegoated within the family.
- Frozen watchfulness
- Low self-esteem and lack of confidence
- Withdrawn or seen as a “loner” – difficulty relating to others.

## **6.10 Recognising Signs of Sexual Abuse**

- 6.10.1 People of all ages and genders may be sexually abused and are frequently scared to say anything due to guilt and/or fear. This is particularly difficult for a child or young person to talk about, and full account should be taken of the cultural sensitivities of any individual child/young person/family.
- 6.10.2 Recognition can be difficult unless the child/ young person discloses and is believed. There may be no physical signs and indications are likely to be emotional/behavioural.
- 6.10.3 Some behavioural indicators associated with this form of abuse are:
- Inappropriate sexualised conduct
  - Sexually explicit behaviour, play or conversation, inappropriate to the persons understanding or developmental age.
  - Continual and inappropriate or excessive masturbation
  - Self-harm (including eating disorder), self-mutilation and suicide attempts.
  - Involvement in prostitution or indiscriminate choice of sexual partners
  - An anxious unwillingness to remove clothes e.g., for sports events (but this may be related to cultural norms or physical difficulties)
- 6.10.4 Some physical indicators associated with this form of abuse are:
- Pain or itching of genital area.

- Blood on underclothes
- Physical symptoms such as injuries to the genital or anal area, bruising to buttocks, abdomen and thighs, sexually transmitted disease, presence of semen on vagina, anus, external genitalia, or clothing.

## **6.11 Recognising Neglect**

6.11.1 Evidence of neglect is built up over a period and can cover different aspects of parenting or caring. Indicators include:

- Failure by Parents or Carers to meet the basic essential needs e.g., adequate food, clothes, warmth, hygiene, and medical care.
- Child or young person thrives away from home environment.
- Child or young person frequently absent from school.
- Child or young person left with adults who are intoxicated or violent.
- Child or young person left alone for excessive periods.

## **7. Appendix 2 - Categories and indicators of abuse (Adults)**

7.1.1 The types and their definitions of abuse for the purpose of these procedures are as follows. Indicators of each type of abuse are also listed.

### **7.2 Physical Abuse**

7.2.1 Acts by others resulting in misuse of medication, physical injury without satisfactory explanation, injury inflicted with or without intent to cause harm, lack of care including inappropriate moving and handling techniques.

7.2.2 Indicators:

- Multiple bruising inconsistent with a fall.
- Black eyes, slap or kick marks, other bruises.
- Abrasions particularly around neck, wrists, and ankles.
- Unexplained burns particularly on back of hands.
- Scalds especially with a well-defined edge from immersion in hot water.
- Hair loss confined to one area (scalp may be sore and tender to touch).
- Frequent minor accidents without seeking medical advice.
- Unexplained fractures.

### **7.3 Neglect**

7.3.1 Behaviours which result in the vulnerable person's basic physical or medical care needs not being met. This includes hygiene, toileting, medication, nutrition and hydration.

7.3.2 Indicators:

- Poor personal hygiene and dirty clothing.
- Ill-fitting clothes or inappropriately dressed.
- Infections/pressure sores
- Weight loss/dehydration.
- Unexplained failure to respond to prescribed medication.

### **7.4 Sexual Abuse**

7.4.1 Involvement of the vulnerable person in sexual activities or relationships which they do not want or understand and to which they are unable to give informed consent.

7.4.2 Physical Indicators:

- Evidence of sexually transmitted disease or vaginal infection.
- Inner thigh bruising or pain/bruising in genital area.

- Inability to sit down or walk comfortably.
- Sleeping disturbances.
- Eating disorders
- Behavioural Signs:
- Inappropriate sexualised behaviour e.g., precocious sex play including excessive masturbation. (This may be expressed in actions, words, or drawings).
- Excessive need for love and affection - this may be expressed in 'seductive behaviour'.
- Difficulty in trusting other adults and members of the peer group.
- Sudden changes in behaviour/mood for no apparent reason.
- Self-destruction tendencies-suicidal attempts, self-mutilation, hair pulling.
- Depression or anxiety.
- Aggressive behaviour including hostility, irritability and defiance of authority figures.

7.4.3 Sharing nudes or semi nudes, when an individual takes an indecent image of themselves and sends this to their friends or partners via mobile phones. Once taken and sent, the sender has lost control of these images and these images could end up anywhere. Due to mobile technology, images can be shared easily between people. Information regarding the risks of nude image sharing can be delivered through 1:1 session with Learners.

## **7.5 Psychological Abuse**

7.5.1 Action or neglect by others which has a harmful effect on the emotional well-being of an individual.

7.5.2 This could include:

- Shouting, swearing, insulting behaviour, threats and ignoring
- Deprivation of the individual's right to choose, information and privacy
- The withholding of security and affection
- Lack of stimulation
- Deliberate humiliation or intimidation

7.5.3 Indicators:

- Disturbed sleep pattern.
- Passivity or depression.

- Low self-esteem.
- Confusion
- Very fearful or anxious.
- Tearful or withdrawn behaviour.
- Change in appetite or unusual weight loss.
- Seeking to leave or running away.

## **7.6 Social Abuse**

7.6.1 The vulnerable person is deprived of the right to engage in activities or to see friends and relatives or to have other social contacts.

7.6.2 Indicators:

- Loss of independence
- Lack of access to television, radio, books and magazines
- Lack of access to transport
- Limited access of other people to the service
- Restricted access to other parts of the service
- Non-attendance at service s, clubs, social activities etc.
- Isolation from religious or cultural activities or antipathy towards them.
- Failure to provide for citizen rights (i.e. voting in elections).

## **7.7 Discriminatory Abuse**

7.7.1 Action or neglect by others which has a discriminatory impact on an individual.

7.7.2 This could include:

- Unequal treatment
- Verbal abuse
- Inappropriate use of language
- Derogatory remarks
- Harassment
- Deliberate exclusion

7.7.3 Indicators

- Lack of respect shown to the individual

- Repeated exclusion from rights afforded to ordinary citizens.
- Denial of a person's communication needs.
- Expressions of anger, frustration, fear, or anxiety

## **7.8 Organisational Abuse**

7.8.1 Action or omission which serves the interests of the worker or the workplace rather than the vulnerable person.

7.8.2 Indicators

- Loss of independence
- Passivity
- Hostility or irritability
- Loss of rights
- Person describes a regimented or authoritarian regime.
- Person not being able to make choices or choices frequently refused.
- Person not being able to express a preference for food or activity.
- Evidence of withdrawal of meals as a punishment
- Evidence of fixed times for getting up and going to bed
- No or limited access for friends or family.
- Evidence of a lax regime with no boundaries or routine, where 'anything goes'
- Failure to manage service s in an appropriate way e.g., when things go wrong, they are not remedied.
- Failure within the managing agency to agree about the purpose and tasks of the service.
- Breakdown in communication between managers and Teams and Learners.
- Low Team Member levels over prolonged periods
- Lack of positive communication with Learners.
- Lack of participatory arrangements or stimulation.
- Lack of flexibility and choice e.g., mealtimes, bedtimes
- Lack of privacy or respect
- Lack of training and development

- Lack of adequate procedures, e.g., for medication or financial management
- Poor professional practice

## 7.9 Material/Financial Abuse

7.9.1 Acts by others resulting in misuse or misappropriation of money, property, and possessions and/or blocking access to these and other material goods. This includes the theft of such items by another person.

7.9.2 Indicators:

- Inadequate money to pay bills.
- Unexplained recent money withdrawals.
- Items going missing.
- Inadequate clothing.
- Negative responses to necessary affordable expenditure.
- Extraordinary interest shown in the adult at risk's assets, property and will.

## 7.10 Domestic Abuse

7.10.1 The cross-government definition of domestic violence and abuse is:

*“any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality.”*

7.10.2 The abuse can encompass but is not limited to:

- Psychological
- Sexual
- Financial

7.10.3 A new offence of coercive and controlling behaviour in intimate and familial relationships was introduced into the Serious Crime Act 2015. The offence will impose a maximum 5-year imprisonment, a fine or both.

7.10.4 The offence closes a gap in the law around patterns of coercive and controlling behaviour during a relationship between intimate partners, former partners who still live together, or family members, sending a clear message that it is wrong to violate the trust of those closest to you, providing better protection to victims experiencing continuous abuse and allowing for earlier identification, intervention and prevention.

7.10.5 Recent changes to the definition of domestic abuse raises awareness that young people in the 16 to 17 age group can also be victims of domestic violence and abuse. Awareness of relationship abuse in teen relationships is raised throughout the college, through posters, help sheets, PSHE/ RSE sessions and 1-1 tutorials. Age-appropriate materials are available for Learners and displayed as appropriate. Any concerns should be raised with DSL, who may refer the Learners to external help and advice.

## **7.11 Bullying**

- 7.11.1 This can be defined as deliberately hurtful behaviour, usually repeated over a period of time, where it is difficult for those bullied to defend themselves. It can take many forms, but the three main types are:
- Physical i.e., hitting, kicking, theft,
  - Verbal i.e., racist, or homophobic remarks, threats, name calling.
  - Psychological i.e., isolating an individual from activities and social acceptance of their peer group.
- 7.11.2 The damage inflicted by bullying can be underestimated. It can cause considerable distress, to the extent that it can affect health and development and, at the extreme, significant harm.
- 7.11.3 It is the responsibility of all Team Members to be alert to the signs and symptoms of bullying and that they understand their roles in helping to prevent and counter bullying by anyone.
- 7.11.4 Cyber-bullying is a different form of bullying and can happen at all times of the day, with a potentially bigger audience and more accessories as people forward on content at a click. It relates to the use of electronic communication to bully a person, typically by sending messages of an intimidating or threatening nature.

## **7.12 Self-neglect**

- 7.12.1 This covers a wide range of behaviour neglecting to care for one's personal hygiene, health or surroundings and includes behaviour such as hoarding. It should be noted that self-neglect may not prompt a section 42 enquiry. An assessment should be made on a case-by-case basis. A decision on whether a response is required under safeguarding will depend on the adult's ability to protect themselves by controlling their own behaviour. There may come a point when they are no longer able to do this, without external support.
- 7.12.2 Incidents of abuse may be one-off or multiple and affect one person or more. Professionals and others should look beyond single incidents or individuals to identify patterns of harm. Repeated instances of poor care may be an indication of more serious problems and of what we now describe as organisational abuse. In order to see these patterns, it is important that information is recorded and appropriately shared.

## **7.13 Prevent / Radicalisation**

- 7.13.1 'Prevent' is part of the government's overall counter-terrorism strategy which is called CONTEST. The aim of Prevent is to reduce the threat from terrorism by stopping people becoming terrorists or supporting terrorism.
- 7.13.2 See the Prevent Policy for further guidance.

## **7.14 Modern slavery**

- 7.14.1 Modern slavery encompasses:
- Slavery

- Human trafficking
- Forced labour and domestic servitude.
- Traffickers and slave masters using whatever means they have at their disposal to coerce, deceive, and force individuals into a life of abuse, servitude and inhumane treatment.

## **7.15 Female Genital Mutilation (FGM)**

7.15.1 Female Genital Mutilation (FGM) comprises all procedures involving the partial or total removal of the external female genitalia or any other injury to the female genital organs for non-medical purposes. It is estimated that over 20,000 girls under the age of 15 in the UK are at risk of FGM each year. Female Genital Mutilation is an offence in England, Wales, and Northern Ireland for anyone (regardless of their nationality or residence status) under the FGM Act 2003.

7.15.2 FGM Protection Orders came into force in 2015 (Section 73, Serious Crime Act 2015) allowing a means of protecting victims or potential victims from FGM under civil law. Likewise, Section 73, Serious Crime Act 2015, introduced a mandatory reporting duty which requires health and social care professionals and teachers in England and Wales to report 'known' cases of FGM in under 18s which they identify in the course of their professional work to the police.

7.15.3 Indicators of potential FGM:

- a long holiday abroad or going 'home' to visit family.
- relative or cutter visiting from abroad.
- a special occasion or ceremony to 'become a woman' or get ready for marriage.
- a female relative being cut – a sister, cousin, or an older female relative such as a mother or aunt.

7.15.4 Indicators FGM may have taken place:

- difficulty walking, standing, or sitting.
- spending longer in the bathroom or toilet.
- appearing withdrawn, anxious, or depressed.
- having unusual behaviour after an absence.
- being particularly reluctant to undergo normal medical examinations.
- asking for help, but not being explicit about the problem due to embarrassment or fear.

7.15.5 Physical effects of FGM:

- severe pain
- shock

- bleeding
- infection such as tetanus, HIV and hepatitis B and C
- organ damage
- blood loss and infections that can cause death in some cases.

## **7.16 Trafficking**

- 7.16.1 Human trafficking is the trade of humans, most commonly for the purpose of sexual slavery, forced labour or commercial sexual exploitation for the trafficker or others. The Modern Slavery Act 2015 sets out the sentences for trafficking offences. Team Members should follow the Safeguarding procedures if they have any concerns.
- 7.16.2 Exploitation shall include, at a minimum, the exploitation of the prostitution of others or other forms of sexual exploitation, forced labour or services, slavery, or practices similar to slavery, servitude, or the removal of organs.

## **7.17 Forced Marriage.**

- 7.17.1 A forced marriage is where one or both people do not (or in cases of people with learning disabilities, cannot) consent to the marriage and pressure or abuse is used. It is recognised in the UK as a form of violence against women and men, domestic/child abuse, and a serious abuse of human rights. The pressure put on people to marry against their will can be physical (including threats, actual physical violence, and sexual violence) or psychological (for example, when someone is made to feel like they are bringing shame on their family). Financial abuse can also be a factor.

## **7.18 Faith Abuse**

- 7.18.1 This may occur in many forms, including physical, psychological, and sexual abuse or neglect. This includes:
- honour based violence
  - belief in concepts of witchcraft and spirit possession
  - demons or the devil acting through people or leading them astray (traditionally seen in some Christian beliefs)
  - the evil eye or djinns (traditionally known in some Islamic faith contexts) / dakini (in the Hindu context)
  - ritual or muti-murders where the killing is believed to bring supernatural benefits, or the use of their body parts is believed to produce potent magical remedies
  - use of belief in magic or witchcraft to create fear in people to make them more compliant when they are being trafficked for domestic slavery or sexual exploitation
- 7.18.2 This is not an exhaustive list and these beliefs not confined to one faith, nationality, or ethnic community.

- 7.18.3 Phoenix do not challenge people's beliefs, but where these beliefs lead to abuse Team Members must follow correct guidelines and process in reporting and recording to safeguard the person.

## **7.19 Gang Violence**

- 7.19.1 Serious violence or gangs will not affect the vast majority of Learners. However, where these problems do occur, there will almost certainly be a significant impact. Phoenix has a duty and a responsibility to protect the People We Support.
- 7.19.2 Phoenix will work with the relevant authorities to report concerns and support strategies put in place to keep the person safe.

## **8. Appendix 3: Responding to Incidents**

### **8.1 Anti-Bullying/Cyberbullying**

- 8.1.1 The college's policy on anti-bullying is set out in a separate document and acknowledges that to allow or condone bullying may lead to consideration under child protection & safeguarding procedures. This includes all forms e.g., cyber, racist, homophobic and gender related bullying.
- 8.1.2 We keep a record of known bullying incidents which is shared with and analysed by the Senior Management Team. All Team Members are aware that children with SEND and / or differences/perceived differences are more susceptible to being bullied / victims of abuse. If the bullying is particularly serious, or the anti-bullying procedures are seen to be ineffective, the College Principal and the DSL will consider implementing safeguarding procedures. The subject of bullying is addressed at regular intervals in our PGP education programme.

### **8.2 Racist Incidents**

- 8.2.1 Our policy on racist incidents is set out separately and acknowledges that repeated racist incidents or a single serious incident may lead to consideration under child protection & safeguarding procedures. We keep a record of racist incidents and report them to the Local Authority

### **8.3 Radicalisation and Extremism**

- 8.3.1 The Prevent Duty for England and Wales (2015) under section 26 of the Counterterrorism and Security Act 2015 places a duty on education and other children's services to have due regard to the need to prevent people from being drawn into terrorism.
- 8.3.2 Extremism is defined as 'vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. We also include in our definition of extremism calls for the death of members of our armed forces, whether in this country or overseas. Some children and young people are at risk of being radicalised; adopting beliefs and engaging in activities which are harmful, criminal, or dangerous.
- 8.3.3 The College is clear that exploitation of vulnerable children and young people and radicalisation should be viewed as a safeguarding concern and follows the Department for Education guidance for College's on preventing children and young people from being drawn into terrorism.
- 8.3.4 The College seeks to protect children and young people against the messages of all violent extremism including, but not restricted to, those linked to Islamist ideology, or to Far Right / Neo Nazi / White Supremacist ideology, Irish Nationalist and Loyalist paramilitary groups, and extremist Animal Rights movements.
- 8.3.5 Team Members receive training to help identify early signs of radicalisation and extremism. Opportunities are provided in the curriculum to enable Learners to discuss issues of religion, ethnicity, and culture. The College Principal and DSL will assess the level of risk within the college campuses and put actions in place to reduce that risk. Risk assessment may include the use of college premises by external agencies, anti-bullying policy and other issues specific to the college's profile, community, and philosophy.

- 8.3.6 When any Team Member has concerns that a Learner may be at risk of radicalisation or involvement in terrorism, they should speak with the DSL. They should then follow normal safeguarding procedures. If the matter is urgent, then the Police must be contacted by dialling 999. In non-urgent cases where police advice is sought then dial 101.
- 8.3.7 The Department of Education has also set up a dedicated telephone helpline for Team Members and the Governance and Oversight Team to raise concerns around Prevent (020 7340 7264).

#### **8.4 Indicators of Vulnerability to Radicalisation**

- 8.4.1 Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism leading to terrorism.
- 8.4.2 Extremism is defined by the Government in the Prevent Strategy as Vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. We also include in our definition of extremism calls for the death of members of our armed forces, whether in this country or overseas.
- 8.4.3 Extremism is defined by the Crown Prosecution Service as “The demonstration of unacceptable behaviour by using any means or medium to express views which:
- Encourage, justify, or glorify terrorist violence in furtherance of particular beliefs.
  - Seek to provoke others to terrorist acts.
  - Encourage other serious criminal activity or seek to provoke others to serious criminal acts; or
  - Foster hatred which might lead to inter-community violence in the UK.
- 8.4.4 There is no such thing as a “typical extremist”: those who become involved in extremist actions come from a range of backgrounds and experiences, and most individuals, even those who hold radical views, do not become involved in violent extremist activity. Learners may become susceptible to radicalisation through a range of social, personal, and environmental factors - it is known that violent extremists exploit vulnerabilities in individuals to drive a wedge between them and their families and communities.
- 8.4.5 It is vital that Team Members are able to recognise those vulnerabilities. Indicators of vulnerability include:
- Identity Crisis – the Learner is distanced from their cultural / religious heritage and experiences discomfort about their place in society.
  - Personal Crisis – the Learner may be experiencing family tensions; a sense of isolation; and low self-esteem; they may have dissociated from their existing friendship group and become involved with a new and different group of friends; they may be searching for answers to questions about identity, faith and belonging.

- Personal Circumstances – migration; local community tensions; and events affecting the Learner country or region of origin may contribute to a sense of grievance that is triggered by personal experience of racism or discrimination or aspects of Government policy.
- Unmet Aspirations – the Learner may have perceptions of injustice; a feeling of failure; rejection of civic life.
- Experiences of Criminality – which may include involvement with criminal groups, imprisonment, and poor resettlement/re-integration.

8.4.6 Special Educational Need – Learners may experience difficulties with social interaction, empathy with others, understanding the consequences of their actions and awareness of the motivations of others.

8.4.7 However, this list is not exhaustive, nor does it mean that all young people experiencing the above are at risk of radicalisation for the purposes of violent extremism. More critical risk factors could include:

- Being in contact with extremist recruiters.
- Accessing violent extremist websites, especially those with a social networking element.
- Possessing or accessing violent extremist literature.
- Using extremist narratives and a global ideology to explain personal disadvantage.
- Justifying the use of violence to solve societal issues.
- Joining or seeking to join extremist organisations.
- Significant changes to appearance and / or behaviour.
- Experiencing a high level of social isolation resulting in issues of identity crisis and / or personal crisis.

8.4.8 The Prevent duty ensures schools and colleges have ‘due regard’ to the need to prevent people from being drawn into terrorism. Channel is the voluntary, confidential support programme which focuses on providing support at an early stage to individuals that have been identified as being vulnerable to radicalisation. Prevent referrals may be passed to the multi-agency Channel panel to determine whether individuals require support. The Prevent Duty can be accessed via this link.

<https://www.gov.uk/government/publications/channel-guidance>

Further information can be obtained from the Home Office website.

## **8.5 Domestic Abuse (incl. Operation Encompass)**

- 8.5.1 Domestic abuse represents one quarter of all violent crime. It is actual or threatened physical, emotional, psychological, or sexual abuse. It involves the use of power and control by one person over another. It occurs regardless of race, ethnicity, gender, class, sexuality, age, and religion, mental or physical ability. Domestic abuse can also involve other types of abuse. We use the term domestic abuse to reflect that a number of abusive and controlling behaviours are involved beyond violence.
- 8.5.2 Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial, or emotional. Children and 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.
- 8.5.3 In some cases, children and young people may blame themselves for the abuse or may have had to leave the family home as a result. Children and young people who witness domestic abuse are at risk of significant harm.

## **8.6 What are the signs to look out for?**

- 8.6.1 Children and young people affected by domestic abuse reflect their distress in a variety of ways. They may change their usual behaviour and become withdrawn, tired, start to wet the bed, and have behavioural difficulties. They may not want to leave their house or may become reluctant to return. Others will excel, using their time in college as a way to escape from their home life. None of these signs are exclusive to domestic abuse so when considering changes in behaviours and concerns about a child or young person, Team Members should think about whether domestic abuse may be a factor.

## **8.7 Exploitation (incl. Child Sex Exploitation, Child Criminal Exploitation & County Lines)**

- 8.7.1 Both CSE and CCE are forms of abuse and both occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal activity. This power imbalance could be due to age, gender, sexual identity, cognitive ability, physical strength, status, and /or access to economic or other resources.
- 8.7.2 The abuse could be linked to an exchange for something the victim perceives that they need or want and/or will be to the financial benefit or other advantage (such as increase status) of the perpetrator or facilitator. The abuse can be perpetrated by individuals or groups, males or females, and adults or children (who themselves may be experiencing exploitation). The abuse can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. It may involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence.
- 8.7.3 Victims can be exploited even when the activity appears consensual, and it should be noted exploitation as well as being physical can be facilitated and/or take place online. The experience of females who are criminally exploited can be very different from males, the indicators may not be the same and both males and females that are being criminally exploited may be at higher risk of sexual exploitation.

- 8.7.4 Any concerns that a child is being or is at risk of being sexually or criminally exploited should be passed without delay to the DSL. We are aware there is a clear link between regular college absence, CSE and CCE. Team Members should consider a child to be at potential CSE/CCE risk in the case of regular college absence and make reasonable enquiries with the child and Parents/Carers to assess this risk. The DSL will use the appropriate Local Authority Assessment tool e.g., the Exploitation Toolkit on all occasions when there is a concern that a child is being or is at risk of being sexually or criminally exploited or where indicators have been observed that are consistent with a child who is being or who is at risk of being sexually or criminally exploited.
- 8.7.5 College Team Members are aware that a child often is not able to recognise the coercive nature of the abuse and does not see themselves as a victim. Consequently, the child may resent what they perceive as interference by Team Members. However, Team Members must act on their concerns as they would for any other type of abuse.
- 8.7.6 The college includes the risks of sexual and criminal exploitation in the PGP curriculum. Learners will be informed of the grooming process and how to protect themselves from people who may potentially be intent on causing harm. They will be supported in terms of recognising and assessing risk in relation to CSE/CCE, including online, and knowing how and where to get help.
- 8.7.7 The following list of indicators is not exhaustive or definitive, but it does highlight common signs which can assist professionals in identifying children or young people who may be victims of sexual or criminal exploitation. Signs include:
- going missing from home or college
  - regular college absence
  - inappropriate sexual or sexualised behaviour
  - sexually risky behaviour, 'swapping' sex
  - repeat sexually transmitted infections.
  - in females, repeat pregnancy, abortions, miscarriage.
  - receiving unexplained gifts or gifts from unknown sources
  - having multiple mobile phones and worrying about losing contact via mobile
  - online safety concerns such as youth produced sexual imagery or being coerced into sharing explicit images.
  - having unaffordable new things (clothes, mobile) or expensive habits (alcohol, drugs)
  - changes in the way they dress.
  - going to hotels or other unusual locations to meet friends.
  - seen at known places of concern.
  - moving around the country, appearing in new towns or cities, not knowing where they are

- getting in/out of different cars driven by unknown adults
- having older boyfriends or girlfriends
- contact with known perpetrators.
- involved in abusive relationships, intimidated and fearful of certain people or situations.
- hanging out with groups of older people, or anti-social groups, or with other vulnerable peers
- associating with other young people involved in sexual exploitation.
- recruiting other young people to exploitative situations
- exclusion, disengagement with college, opting out of education altogether.
- unexplained changes in behaviour or personality (chaotic, aggressive, sexual)
- mood swings, volatile behaviour, emotional distress
- self-harming, suicidal thoughts, suicide attempts, overdosing, eating disorders.
- drug or alcohol misuse
- getting involved in crime.
- police involvement, police records
- involved in gangs, gang fights, gang membership.
- injuries from physical assault, physical restraint, sexual assault.

8.7.8 Child Criminal Exploitation can include children 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.

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

8.7.10 Exploitation is an integral part of the county lines offending model with children and vulnerable adults being exploited to move (and store) drugs and money. The same grooming models used to coerce, intimidate, and abuse individuals for sexual and criminal exploitation are also used for grooming vulnerable individuals for county lines.

- 8.7.11 CSE is a form of child sexual abuse. CSE can occur over time or be a one-off occurrence. CSE can affect any child, who has been coerced into engaging in sexual activities. This includes 16 and 17-year-olds who can legally consent to have sex. Sexual abuse may involve physical contact, including assault by penetration (for example, rape or oral sex) or nonpenetrative acts such as masturbation, kissing, rubbing, and touching outside clothing. It may include non-contact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse including via the internet.

## **8.8 Female Genital Mutilation (FGM)**

- 8.8.1 It is essential that Team Members are aware of FGM practices and the need to look for signs, symptoms, and other indicators of FGM. If a Team Member, in the course of their work, discovers that an act of FGM appears to have been carried out, they must report this to the Police.
- 8.8.2 Female Genital Mutilation (FGM) is illegal in England and Wales under the FGM Act 2003 ("the 2003 Act"). It is a form of child abuse and violence against women. FGM comprises all procedures involving partial or total removal of the external female genitalia for non-medical reasons. Section 5B of the 2003 Act 1 introduces a mandatory reporting duty which requires regulated health and social care professionals and teachers in England and Wales to report 'known' cases of FGM in under 18s which they identify in the course of their professional work to the police. The duty came into force on 31 October 2015.
- 8.8.3 FGM involves procedures that intentionally alter/injure the female genital organs for non-medical reasons. FGM is internationally recognised as a violation of human rights of girls and women. Female Genital Mutilation (FGM) is illegal in England and Wales under the FGM Act (2003). The duty applies to all persons in our School who is employed or engaged to carry out 'teaching work' in the school, whether or not they have qualified teacher status. The duty applies to the individual who becomes aware of the case to make a report. It should not be transferred to the Designated Safeguarding Lead; however, the DSL should be informed. If a teacher is informed by a female aged under 18 that an act of FGM has been carried out on her, or a teacher observes physical signs which appear to show that an act of FGM has been carried out on a female aged under 18, and they have no reason to believe the act was necessary for physical or mental health or for purposes connected with labour or birth, the teacher should personally make a report to the police force in which the female resides by calling 101. The report should be made by the close of the next working day.
- 8.8.4 Team Members are trained to be aware of risk indicators of FGM. Concerns about FGM outside of the mandatory reporting duty should be reported as per the Colleges safeguarding and child protection procedures. Team Members should be particularly alert to suspicions or concerns expressed by female Learners about going on a long holiday during the summer vacation period. There should also be consideration of potential risk to other girls in the family and practicing community. Where there is a risk to life or likelihood of serious immediate harm the teacher should report the case immediately to the police, including dialling 999 if appropriate.
- 8.8.5 There are no circumstances in which a teacher or other Team Members should examine a female. Circumstances and occurrences that may point to FGM happening are:
- Talking about getting ready for a special ceremony
  - Family taking a long trip abroad.

- Family being from one of the ‘at risk’ communities for FGM (Kenya, Somalia, Sudan, Sierra Leon, Egypt, Nigeria, Eritrea as well as non-African communities including Yemeni, Afghani, Kurdistan, Indonesia, and Pakistan)
- Knowledge that the child’s sibling has undergone FGM.
- Child talks about going abroad to be ‘cut’ or to prepare for marriage Signs that may indicate a child has undergone FGM.
- Prolonged absence from college and other activities
- Behaviour changes on return from a holiday abroad, such as being withdrawn and appearing subdued.
- Bladder or menstrual problems
- Finding it difficult to sit still and looking uncomfortable.
- Complaining about pain between the legs
- Mentioning something somebody did to them that they are not allowed to talk about
- Secretive behaviour, including isolating themselves from the group.
- Reluctance to take part in physical activity.
- Repeated urinal tract infection
- Disclosure

## **8.9 The ‘One Chance’ rule**

- 8.9.1 As with Forced Marriage (outlined below) there is the ‘One Chance’ rule. It is essential that the college acts without delay and makes a referral to the Local Authority and Police.

## **8.10 Forced Marriage**

- 8.10.1 A forced marriage is a marriage in which one or both people do not (or in cases of some people with learning disabilities cannot) consent to the marriage but are coerced into it. Coercion may include physical, psychological, financial, sexual, and emotional pressure. It may also involve physical or sexual violence and abuse. Forced marriage is an appalling and indefensible practice and is recognised in the UK as a form of violence against women and men, domestic/child abuse, and a serious abuse of human rights.
- 8.10.2 Since June 2014 forcing someone to marry has become a criminal offence in England and Wales under the Anti-Social Behaviour, Crime and Policing Act 2014. A forced marriage is not the same as an arranged marriage which is common in several cultures. The families of both spouses take a leading role in arranging the marriage but the choice of whether or not to accept the arrangement remains with the prospective spouses.
- 8.10.3 Team Members should never attempt to intervene directly as a college or through a third party. Contact should be made with the Local Authority Safeguarding team.

## **8.11 Honour-based abuse**

8.11.1 Honour based abuse (HBV) can be described as a collection of practices, which are used to control behaviour within families or other social groups to protect perceived cultural and religious beliefs and/or honour. Such abuse can occur when perpetrators perceive that a relative has shamed the family and/or community by breaking their honour code.

8.11.2 Honour based abuse might be committed against people who:

- become involved with a boyfriend or girlfriend from a different culture or religion.
- want to get out of an arranged marriage.
- want to get out of a forced marriage.
- wear clothes or take part in activities that might not be considered traditional within a particular culture.
- It is a violation of human rights and may be a form of domestic and/or sexual abuse. There is no, and cannot be, honour or justification for abusing the human rights of others.

## **8.12 One Chance Rule**

8.12.1 All Team Members are aware of the 'One Chance' Rule' in relation to forced marriage, FGM and HBV. Team Members recognise they may only have one chance' to speak to a Learner who is a potential victim and have just one chance to save a life. The College is aware that if the victim is not offered support following disclosure that the 'One Chance' opportunity may be lost. Therefore, all Team Members are aware of their responsibilities and obligations when they become aware of potential forced marriage, FGM and HBV cases.

## **8.13 Mental Health**

8.13.1 Team Members will be aware that mental health problems can, in some cases, be an indicator that a child or young person has suffered or is at risk of suffering abuse, neglect or exploitation. Whilst the college recognise that only appropriately trained professionals can diagnose mental health problems; Team Members are able to make day to day observations of children and young people and identify such behaviour that may suggest they are experiencing a mental health problem or be at risk of developing one.

## **8.14 Private Fostering Arrangements**

8.14.1 A private fostering arrangement occurs when someone other than a parent or close relative cares for a child for a period of 28 days or more, with the agreement of the child's Parents/Carers. It applies to children under the age of 16 or 18 if the child is disabled. Children and young people looked after by the local authority or who are placed in residential schools, children's homes or hospitals are not considered to be privately fostered.

8.14.2 Private fostering occurs in all cultures, including British culture and children may be privately fostered at any age. The college recognises that most privately fostered children remain safe and well but are aware that safeguarding concerns have been raised in some cases. Therefore, all Team Members are alert to possible safeguarding issues, including the possibility that the child or young person has been trafficked into the country.

8.14.3 By law, a parent, private foster carer, or other persons involved in making a private fostering arrangement must notify children's services as soon as possible. However, where a Team Member becomes aware that a Learner may be in a private fostering arrangement, they will raise this with the DSL and the DSL will notify the LA of the circumstances.

## **8.15 Looked after children and previously looked after children.**

8.15.1 The most common reason for children becoming looked after is as a result of abuse and neglect. The College will ensure that Team Members have the necessary skills and understanding to keep looked after/previously looked after children safe. Appropriate Team Members have information about a child's looked after legal status and care arrangements, including the level of authority delegated to the carer by the authority looking after the child and contact arrangements with birth Parents or those with parental responsibility.

8.15.2 The designated teacher will follow the statutory guidance 'Promoting the Education of Looked After Children.'

## **8.16 Children Missing Education and Children Absent from Education**

8.16.1 Attendance and absence are closely monitored. The college will hold more than one emergency contact number for Learners where reasonably possible. A child going missing or being absent from education is a potential indicator of abuse and neglect, including sexual abuse and sexual exploitation. The DSL will monitor unauthorised absences and take appropriate action including notifying the local authority particularly where children go missing on repeat occasions and/or are missing for periods during the college day in conjunction with 'Children Missing Education: Statutory Guidance for Local Authorities'

8.16.2 Team Members must be alert to signs of children at risk of travelling to conflict zones, female genital mutilation and forced marriage.

## **8.17 Child on Child Abuse (including Sexual Violence, Sexual Harassment and HSB)**

8.17.1 The College management team will take due regard to Part 5 of KCSiE. In most instances, the conduct of Learners towards each other will be covered by our behaviour policy. However, some allegations may be of such a serious nature that they may raise safeguarding concerns. The college recognises that children and young people are capable of abusing their peers. It will not be passed off as 'banter' or 'part of growing up.' The forms of child-on-child abuse are outlined below.

- domestic abuse – an incident or pattern of actual or threatened acts of physical, sexual, financial and/or emotional abuse, perpetrated by an adolescent against a current or former dating partner regardless of gender or sexuality.
- bullying (including cyberbullying, prejudice-based and discriminatory bullying).

- child sexual exploitation – children under the age of 18 may be sexually abused in the context of exploitative relationships, contexts and situations by peers who are also under 18.
- harmful sexual behaviour – children and young people presenting with sexual behaviours that are outside of developmentally ‘normative’ parameters and harmful to themselves and others.
- upskirting – which typically involves taking a picture under a person’s clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or alarm.
- serious youth violence which is any offence of most serious violence or weapon enabled crime, where the victim is aged 0-19 i.e., murder, manslaughter, rape, wounding with intent and causing grievous bodily harm. ‘Youth violence’ is defined in the same way, but also includes assault with injury offences. All Team Members will receive training so that they are aware of indicators which may signal that children are at risk from or involved with serious violence and crime.
- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element)
- consensual and non-consensual sharing of nudes and semi nudes’ images and or videos (also known as sexting or youth produced sexual imagery).

8.17.2 The term child-on-child abuse can refer to all of these definitions and a child may experience one or multiple facets of abuse at any one time. Therefore, our response will cut across these definitions and capture the complex web of their experiences. There are also different gender issues that can be prevalent when dealing with child-on-child abuse (i.e., females being sexually touched/assaulted, or males being subjected to initiation/hazing type violence). The college aims to reduce the likelihood of child-on-child abuse through:

- the established ethos of respect, friendship, courtesy, and kindness.
- High expectations of behaviour.
- clear consequences for unacceptable behaviour
- providing a developmentally appropriate RSE curriculum which develops Learners understanding of healthy relationships, acceptable behaviour, consent and keeping themselves safe.
- systems for any Learner to raise concerns with Team Members, knowing that they will be listened to, valued, and believed.
- robust risk assessments and providing targeted work for Learners identified as being a potential risk to other Learners and those identified as being at risk.

- 8.17.3 Research indicates that young people rarely disclose child-on-child abuse and that if they do, it is likely to be to their friends. Therefore, the college will also educate Learners in how to support their friends if they are concerned about them, that they should talk to a trusted adult in the college and what services they can contact for further advice. Any concerns, disclosures, or allegations of child-on-child abuse in any form should be referred to the DSL using the college's safeguarding and child protection procedures as set out in this policy.
- 8.17.4 Where a concern regarding child-on-child abuse has been disclosed to the DSL(s), advice and guidance will be sought from the Local Authority Safeguarding team and where it is clear a crime has been committed or there is a risk of crime being committed the Police will be contacted. Working with external agencies the college will respond to the unacceptable behaviour. If a Learner's behaviour negatively impacts on the safety and welfare of other Learners, then safeguards will be put in place to promote the well-being of the Learners affected and the victim and perpetrator will be provided with support.

## **8.18 Sexual Harassment, Sexual Violence and Harmful Sexual Behaviour**

- 8.18.1 The boundary between what is abusive and what is part of normal adolescence or youthful experimentation can be blurred. The determination of whether behaviour is developmental, inappropriate, or abusive will hinge around the related concepts of true consent, power imbalance and exploitation. Learner's sexual behaviour exists on a wide continuum, ranging 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. This may include children and young people who exhibit a range of sexually problematic behaviour such as indecent exposure, obscene telephone calls, fetishism, bestiality and sexual abuse against adults, peers, or children. Team Members should be vigilant to:
- bullying (including cyberbullying)
  - physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm.
  - sexual violence and sexual harassment
  - sexting (also known as youth produced sexual imagery)
  - initiation/hazing type violence and rituals
  - upskirting
- 8.18.2 Developmental Sexual Activity encompasses those actions that are to be expected from children and young people as they move from infancy through to an adult understanding of their physical, emotional, and behavioural relationships with each other. Such sexual activity is essentially information gathering and experience testing. It is characterised by mutuality and of the seeking of consent.

- 8.18.3 Inappropriate Sexual Behaviour can be inappropriate socially, inappropriate to development, or both. In considering whether behaviour fits into this category, it is important to consider what negative effects it has on any of the parties involved and what concerns it raises about a child or young person. It should be recognised that some actions may be motivated by information seeking, but still cause significant upset, confusion, worry, physical damage, etc. It may also be that the behaviour is “acting out” which may derive from other sexual situations to which the child or young person has been exposed. If an act appears to have been inappropriate, there may still be a need for some form of behaviour management or intervention. For some children and young people, educative inputs may be enough to address the behaviour.
- 8.18.4 To determine the nature of the incident the following factors more fully should be given consideration. The presence of exploitation in terms of:
- Equality – consider differentials of physical, cognitive, and emotional development, power and control and authority, passive and assertive tendencies.
  - Consent – agreement including all the following:
    - Understanding that is proposed based on age, maturity, development level, functioning and experience.
    - Knowledge of society’s standards for what is being proposed.
    - Awareness of potential consequences and alternatives
    - Assumption that agreements or disagreements will be respected equally.
    - Voluntary decision
    - Mental competence
  - Coercion – the young perpetrator who abuses may use techniques like bribing, manipulation and emotional threats of secondary gains and losses that is loss of love, friendship, etc. Some may use physical force, brutality, or the threat of these regardless of victim resistance.

## **8.19 Online Safety**

- 8.19.1 Young people increasingly use electronic equipment on a daily basis to access the internet and share content and images via social media sites such as Facebook, twitter, Instagram, Snapchat and ooVoo. Unfortunately, some adults and other children use these technologies to harm children and young people. The harm might range from sending hurtful or abusive texts or emails, to grooming and enticing to engage in sexual behaviour such as webcam photography or face-to-face meetings. Learners may also be distressed or harmed by accessing inappropriate material such as pornographic websites or those which promote extremist behaviour, criminal activity, suicide or eating disorders.

- 8.19.2 The College has an online safety policy which explains how we try to keep Learners safe at college and how we respond to online safety incidents. The college will also provide advice to Parents/Carers when Learners are being asked to learn online at home and consider how best to safeguard both Learners and Team Members. Learners are taught about online safety throughout the curriculum and all Team Members receive online safety training which is regularly updated.

## **8.20 Youth produced sexual imagery (sexting)**

- 8.20.1 The practice of children and young people sharing images and videos via text message, email, social media, or mobile messaging apps has become commonplace. However, this online technology has also given them the opportunity to produce and distribute sexual imagery in the form of photos and videos. Such imagery involving anyone under the age of 18 is illegal.
- 8.20.2 Youth produced sexual imagery refers to both images and videos where:
- A person under the age of 18 creates and shares sexual imagery of themselves with a peer under the age of 18.
  - A person under the age of 18 shares sexual imagery created by another person under the age of 18 with a peer under the age of 18 or an adult.
  - A person under the age of 18 is in possession of sexual imagery created by another person under the age of 18.
- 8.20.3 All incidents of this nature should be treated as a safeguarding concern and in line with the UKCIS guidance 'Sexting in schools and colleges: responding to incidents and safeguarding young people, and 'Sharing nudes and semi-nudes: how to respond to an incident. Cases where sexual imagery of people under 18 has been shared by adults and where sexual imagery of a person of any age has been shared by an adult to a child is child sexual abuse and should be responded to accordingly. If a Team Member becomes aware of an incident involving youth produced sexual imagery, they should follow the safeguarding and child protection procedures and refer to the DSL as soon as possible. The Team Member should confiscate the device involved and set it to flight mode or, if this is not possible, turn it off. Team Members should not view, copy, or print the youth produced sexual imagery. The DSL should hold an initial review meeting with appropriate college Team Members and subsequent interviews with the children or young people involved (if appropriate). Parents/Carers should be informed at an early stage and involved in the process unless there is reason to believe that involving Parents/Carers would put the child at risk of harm. At any point in the process if there is concern a young person has been harmed or is at risk of harm a referral should be made to the Local Authority Safeguarding team and/or the Police as appropriate.
- 8.20.4 Immediate referral at the initial review stage should be made to the Local Authority Safeguarding team/Police if:
- The incident involves an adult.
  - There is good reason to believe that a young person has been coerced, blackmailed, or groomed or if there are concerns about their capacity to consent (for example, owing to special education needs).
  - What you know about the imagery suggests the content depicts sexual acts which are unusual for the child's development stage or are violent.

- The imagery involves sexual acts.
- The imagery involves anyone aged 12 or under
- There is reason to believe a child is at immediate risk of harm owing to the sharing of the imagery, for example the child is presenting as suicidal or self-harming.

8.20.5 If none of the above apply then the DSL will use their professional judgement to assess the risk to Learners involved and may decide, with input from the Principal, to respond to the incident without escalation to the Local Authority Safeguarding Hub or the police. Such decisions will be recorded. In applying judgement, the DSL will consider if:

- there is a significant age difference between the sender/receiver.
- there is any coercion or encouragement beyond the sender/receiver.
- the imagery was shared and received with the knowledge of the child in the imagery.
- the child is more vulnerable than usual i.e., at risk.
- there is a significant impact on the children involved.
- the image is of a severe or extreme nature.
- the child involved understands consent.
- the situation is isolated or if the image been more widely distributed.
- there are other circumstances relating to either the sender or recipient that may add cause for concern i.e., difficult home circumstances.
- the children have been involved in incidents relating to youth produced imagery before.

8.20.6 If any of these circumstances are present the situation will be escalated according to our safeguarding and child protection procedures, including reporting to the police or the Local Authority Safeguarding team. Otherwise, the situation will be managed within the college. The DSL will record all incidents of youth produced sexual imagery, including both the actions taken, actions not taken, reasons for doing so and the resolution in line with safeguarding recording procedure.