Policy document

KING EDWARD VI COLLEGE
STOURBRIDGE

Safeguarding and Child Protection

1 Policy Statement

1.1 Safeguarding and Child Protection is everyone's responsibility. This policy applies to all staff, volunteers and governors and is consistent with the procedures of the three safeguarding partners. Our policy and procedures also apply to extended college and off-site activities.

King Edward VI College aims to ensure that action is taken in a timely manner to safeguard and promote children's welfare.

1.2 All staff are aware of their statutory responsibilities with respect to safeguarding and are trained in recognising and reporting safeguarding and child protection matters;

1.3 The College recognises that some children have an increased risk of abuse, and additional barriers can exist which prevent recognition or disclosure. We are committed to anti-discriminatory practice and recognise the diversity of children's experiences whilst ensuring all children receive an equal level of protection, regardless of any barriers they may face.
We are mindful of and give special consideration to children who:

- have special educational needs or disabilities;
- are young carers/have caring responsibilities;
- may experience discrimination due to race, ethnicity, religion, gender identification or sexuality;
- where English is an additional language;
- are living in challenging circumstances including temporary accommodation, or where there are challenges around domestic or substance abuse;
- are at risk of Female Genital Mutilation, sexual and/or criminal exploitation, forced marriage or radicalisation;
- are asylum seekers;
- are at risk due to their own or a family member's mental health needs;
- are Children in Care or previously Children in Care, or live in a kinship care arrangement;
- are supported (or have been supported) by a social worker;
- have unexplainable and/or persistent absences from education.

2 Statutory Framework

2.1 This policy is based on the Department for Education's statutory guidance Keeping children safe in education 2024 (which applies to providers of post 16 education as set out in The Education and Training (Welfare of Children) Act 2021), Working together to safeguard children 2023. Academy trust governance guide and,

Meeting digital and technology standards in schools and colleges. We comply with this guidance and the arrangements agreed and published by our three local safeguarding partners; https://dudleysafeguarding.org.uk/ ;

2.2 The policy is also based on Section 157 of the Education Act 2002, which places a duty of schools, colleges and local authorities to safeguard and promote the welfare of students, and The School Staffing (England) Regulations 2009, which set out what must be recorded on the single central record and the requirement for at least one person conducting an interview to be trained in safer recruitment techniques;

2.3 The policy is also based on The Children Act 1989 (and 2004 amendment), which provides a framework for the care and protection of children, section 5B (11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the Serious Crime Act 2015, which places a statutory duty on teachers to report to the police where they discover that FGM appears to have been carried out on a girl under 18, and Statutory guidance on FGM which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM;

2.4 It is also based on The Rehabilitation of Offenders Act 1974, which outlines when people with criminal convictions can work with children; Safeguarding Vulnerable Groups Act 2006, which defines 'regulated activity' in relation to children; Statutory guidance on the Prevent duty 2023, which explains our duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism, and Information Sharing (2024).

The policy is also informed by The Human Rights Act 1998 which explains how being subjected to harassment, violence and/or abuse, including that of a sexual nature, may breach any or all of the rights which apply to individuals under the European Convention on Human Rights, and The Equality Act 2010 which makes it unlawful to discriminate against people regarding particular protected characteristics (including disability, sex, sexual orientation, gender reassignment and race).

This means our governors and the Principal carefully consider how they support our students with regard to these characteristics and allows our college to take positive action to deal with particular disadvantages affecting students (where we can show it's proportionate), including making reasonable adjustments for students with disabilities. For example, this could include taking positive action to support girls where there is evidence which indicates they are disproportionately subjected to sexual violence or harassment. Furthermore, The ~~Public~~ Public Sector Equality Duty explains how we must have due regard to eliminating unlawful discrimination, harassment and victimisation and helps us focus on key issues of concern and how to improve student outcomes, including for those students who are more at risk of harm from issues such as sexual violence, homophobic, biphobic or transphobic bullying, or racial discrimination.

2.5 This policy has taken our locally agreed multi-agency procedures, implemented by the three safeguarding partners:

- The local authority;
- Integrated care boards (previously known as clinical commissioning groups) for an area within the local authority;

- The chief officer of police for a police area in the local authority.

Dudley's procedures are available via https://dudleysafeguarding.org.uk/ and Support Level Guidance and Framework March 2023.

The safeguarding priorities for Dudley 2022/24 are:

- Neglect;
- Exploitation;
- Family Safeguarding.

These are detailed further on the above website and are included in whole college training.

In addition, the Dudley Early Help Strategy 2021-2014 has three Cluster Connect priorities which are:

- Tackling Poverty;
- Tackling Loneliness and Isolation;
- Keeping Children Safe and Active.

Further details are available at Dudley Early Help Strategy

3 The Designated Safeguarding Lead

3.1 The DSL is a member of the senior leadership team. Our DSL is Sarah MacKenzie (Assistant Principal for Student Support) and is also the Designated Senior Mental Health Lead. The DSL takes lead responsibility for child protection and wider safeguarding in the College. This includes online safety and understanding of our filtering and monitoring processes on college devices and college networks to keep students safe online.

During term time, the DSL and her team will be available during college hours for staff to discuss any safeguarding concerns.

When the DSL is absent, the Deputy DSLs will act as cover:

- Laura Day (Safeguarding Officer)
- Stuart Parkes (Senior Tutor)
- Lowri Saenger (SENCo)
- Aimie Chatfield (Medical Welfare Officer)

Separate arrangements are in place for out of hours and holidays and can be accessed via our reception on 01384 398100 in the first instance.

3.2 The DSL (and her Deputies) will be given the time, funding, training, resources, and support to:

- Work closely with teachers and share information and provide advice and support to other staff on child welfare and safeguarding and child protection matters;

- Set out procedures so that staff promptly share their safeguarding concerns in writing;
- Help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children, including children with a social worker, are experiencing, or have experienced, with teachers and college leadership staff. Their role includes ensuring that the College, and their staff, know who these children are, understand their academic progress and attainment and maintain a culture of high aspirations for this cohort; supporting teaching staff to identify the challenges that children in this group might face and the additional academic support and adjustments that they could make to best support these children;
- Refer cases of suspected abuse and neglect to the local authority children's social care as required and support staff who make referrals to local authority children's social care;
- Refer cases to Prevent where there is a radicalisation concern as required and support staff who make referrals;
- Refer cases where a crime may have been committed to the Police;
- Take part in strategy discussions and inter-agency meetings and/or support other staff to do so;
- Contribute to the assessment of children, particularly in relation to Early Help;
- Work closely with Deputy Designated Senior Mental Health Lead;
- Refer suspected cases, as appropriate, to the relevant body (local authority children's social care, Prevent, Disclosure and Barring Service and/or police), and support staff who make such referrals directly;
- Have a good understanding of harmful sexual behaviour;
- Have a good understanding and take the lead of the filtering and monitoring systems and processes in place at the College;
- Know what local specialist support is available to support all children involved (including victims and alleged perpetrators) in sexual violence and sexual harassment, and how to access this support;
- that children must have an 'appropriate adult' to support and help them in the case of a police investigation or search;
- The DSL will also keep the Principal informed of any issues and liaise with local authority case managers and designated officers (LADO) for safeguarding and child protection concerns as appropriate.

The full responsibilities of the DSL and Deputy DSLs are set out in their job description.

4 The Principal, Governing Body, Trustees and Proprietors

4.1 The Principal is responsible for the implementation of this policy, including:

- Ensuring that staff (including temporary and supply staff) and volunteers are informed of our systems which support safeguarding, including this policy, as part of their induction;
- Communicating this policy to parents/guardians when their child joins the College and via the website;
- Ensuring that the DSL has appropriate time, funding, training, and resources, and that there is always adequate cover if the DSL is absent;

- Ensuring that all staff undertake appropriate safeguarding and child protection training and update this regularly;
- Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate;
- Refer cases where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service/Teaching Regulatory Agency/TRA as required;
- Making decisions regarding all low-level concerns, though they may wish to collaborate with the DSL;
- Completing appropriate safeguarding and child protection (including online) training.

4.2 The Governing Body, Trustees or Proprietors will approve this policy at each review, ensure it complies with the law and hold the Principal to account for its implementation.

The Governing Body/Trust will appoint a senior board level (or equivalent) lead to monitor the effectiveness of this policy in conjunction with the full governing board. This is always a different person from the DSL. Our Safeguarding Governor is Jonathan Wilding.

The Chair of Governors (John Hodt) will act as the 'case manager' if an allegation of abuse is made against the Principal, where appropriate (Appendix 1).

The Governing Body will also ensure that the College has appropriate filtering and monitoring systems in place and review their effectiveness. This includes:

- Making sure that the leadership team and staff are aware of the provisions in place, and that they understand their expectations, roles and responsibilities around filtering and monitoring as part of safeguarding training;
- Reviewing the DfE's filtering and monitoring standards and discussing with IT staff and service providers what needs to be done to support the school in meeting these standards.

Where another body is providing services or activities (regardless of whether or not the children who attend these services/activities are children on the college roll) they will:

- Seek assurance that the other body has appropriate safeguarding and child protection policies/procedures in place, and inspect them if needed;
- Make sure there are arrangements for the body to liaise with the college about safeguarding arrangements, where appropriate;
- Make sure that safeguarding requirements are a condition of using the college premises, and that any agreement to use the premises would be terminated if the other body fails to comply.

All Governors have read and understood Keeping Children Safe in Education 2024. (Part Two of this policy has information on how governors are supported to fulfil their role).

5 Safeguarding Policies and Procedures; Legal Responsibilities and Duty to Share Information

5.1 Our safeguarding responsibilities include:

- 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 the 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;
- taking action to enable all children to have the best outcomes.

5.2 **Child protection** is part of this definition and refers to activities undertaken to prevent children suffering, or being likely to suffer, significant harm.

Abuse is a form of maltreatment of a child and may involve inflicting harm or failing to act to prevent harm.

Neglect is a form of abuse and is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. [Section 12 defines neglect in more detail.]

Exploitation happens when an individual or group unfairly takes advantage of a person to coerce, manipulate or deceive for personal gain and includes financial gain, sexual gratification, or labour.

Sexting (also known as youth produced sexual imagery) is the sharing of sexual imagery (photos or videos) by children.

Children includes everyone under the age of 18.

5.3 The following three **Safeguarding Partners** are identified in Keeping Children Safe in Education (and defined in the Children Act 2004, as amended by chapter 2 of the Children and Social Work Act 2017). They will decide to work together to safeguard and promote the welfare of local children, including identifying and responding to their needs:

- The local authority (LA;)
- Integrated care boards (previously known as clinical commissioning groups) for an area within the local authority;
- The chief officer of police for a police area in the LA area.

6 Roles and Responsibilities

6.1 Safeguarding and child protection is everyone's responsibility. This policy applies to all staff, volunteers and governors/trustees in the College and is consistent with the procedures of the three safeguarding partners. Our policy and procedures also apply to extended college and off-site activities. Our college curriculum is detailed in Section 10 of this policy.

All staff

All staff are required to confirm and sign a declaration at the beginning of each year to confirm they have read, understood, agree to abide by the principles and follow the guidance outlined in Part 1 and Annex B (according to their role) of the Department for Education's statutory safeguarding guidance, Keeping Children Safe in Education 2024, and review it at least annually. They will reinforce the importance of online safety when communicating with parents/guardians and students, and the College will make them aware of what we ask students to do online including the sites they need to visit and who they may be interacting with online.

All staff will be aware of:

- Our systems which support safeguarding, including this child protection and safeguarding policy, the staff, the role and identity of the designated safeguarding lead (DSL) and deputy/deputies, the Staff Code of Conduct the Visitor Policy and the safeguarding response to children who are absent from education;
- Online safety which includes the expectations, applicable roles, and responsibilities in relation to filtering and monitoring;
- The Early Help process and their role in it, including identifying emerging problems, liaising with the DSL and her Deputies, and sharing information with other professionals to support early identification and assessment;
- The process for making referrals to local authority children's social care and for statutory assessments that may follow a referral, including the role they might be expected to play;
- What to do if they identify a safeguarding issue or a child tells them they are being abused, neglected, or exploited, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals;
- The signs of different types of abuse, neglect, and exploitation, (including Child Sexual and Child Criminal Exploitation) as well as specific safeguarding issues, such as indicators of being at risk from or involved with serious violent crime, FGM and radicalisation;
- The importance of reassuring victims they are being taken seriously and they will be supported and kept safe;
- The fact that children can be at risk of harm inside and outside of their home, at college and online;
- What to look for to identify children who need help or protection.

Staff Safeguarding Training

All staff members will undertake safeguarding and child protection training, online safety training which includes IT filtering and monitoring roles and responsibilities, together with managing allegations and whistle-blowing procedures, to ensure they understand the College's safeguarding systems and their responsibilities and can identify signs of possible abuse, neglect, or exploitation. This training will be regularly updated and will be in line with local and statutory guidelines.

All staff will have training on the government's anti-radicalisation strategy, Prevent, to enable them to identify children at risk of being drawn into terrorism and to challenge extremist ideas.

All staff will also undertake annual cyber-security training.

All teachers will have regard to the Teachers' Standards to support the expectation that all teachers will manage behaviour effectively to ensure a positive and safe environment and have a clear understanding of the needs of all students.

Staff will also receive regular safeguarding and child protection updates and training (including online safety) as required through training sessions, emails, briefings, and staff meetings.

All new staff will receive robust safeguarding training in line with the whole college training package. This will be delivered as part of their induction process before they commence working with our students.

Volunteers and Contractors will receive appropriate training, if applicable.

6.2 The DSL and Deputy DSLs

The DSL and deputies will undertake child protection and safeguarding training at least every two years. Online safety training will be undertaken annually and regularly updated to keep knowledge of staying safe online and the risks associated up to date. This includes filtering and monitoring and cyber security.

In addition, they will update their knowledge and skills at regular intervals and at least annually (for example, through e-bulletins, meeting other DSLs, or taking time to read and digest safeguarding developments). They will also undertake Prevent Awareness training.

6.3 Governors

All governors receive safeguarding training (including Prevent and online safety) at induction and are regularly updated to make sure they have the knowledge and information needed to perform their functions and understand their responsibilities, including providing strategic challenge and receiving assurance that safeguarding policies and procedures are effective and support the College to deliver a robust whole-college approach to safeguarding.

As the Chair of Governors may be required to act as the 'case manager' if an allegation of abuse is made against the Principal, they receive training in managing allegations for this purpose.

All Governors will undertake training relating to online filtering and monitoring and, in addition, one Governor will undertake cyber security training.

6.4 Staff who have safeguarding responsibilities

All staff who have regular safeguarding contact with children and their families will attend supervision with the DSL (who has completed safeguarding supervision training with the NSPCC) to provide them with support, coaching and training, promote the interests of children and allow for confidential discussions of sensitive issues.

7 Confidentiality

7.1 Please refer to the current Data protection policy

7.2

- Timely information sharing is essential to effective safeguarding;
- Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety, of children;
- The Data Protection Act (DPA) 2018 and GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe;
- If staff need to share 'special category personal data', the DPA 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information without consent if it is not possible to gain consent, it cannot be reasonably expected that a practitioner gains consent, or if to gain consent would place a child at risk;
- Staff should never promise a child that they will not tell anyone about a report of abuse, as this may not be in the child's best interests;
- The government's Information Sharing Advice for Safeguarding Practitioners includes 7 'golden rules' for sharing information, and will support staff who have to make decisions about sharing information;
- If staff are in any doubt about sharing information, they should speak to the Designated Safeguarding Lead (or Deputy);
- Confidentiality is also addressed in this policy with respect to record-keeping in Section 10;
- Designated Safeguarding Leads are trained to keep detailed, accurate, secure written records of all concerns, discussions and decisions made including the rationale for those decisions; this includes instances where referrals were or were not made to another agency such as LA children's social care or the Prevent program etc.

8 Communication with Parents and Guardians

8.1 Where appropriate, we will discuss any concerns about a child with the child's parents or guardians. The DSL or a DDSL will normally do this in the event of a suspicion or disclosure.

Other staff will only talk to parents about any such concerns following consultation with the DSL.

If we believe that notifying the parents would increase the risk to the child, we will discuss this with the local authority children's social care team before doing so.

In the case of allegations of abuse made against other children, we will usually notify the parents or guardians of all the children involved.

We will work with the police and/or the local authority children's social care to make sure our approach to information sharing is consistent.

9 Whole Staff Responsibilities

9.1 All staff, volunteers and governors must follow the procedures set out below in the event of a safeguarding issue:

If a child is suffering or likely to suffer harm, or is in immediate danger
Make a referral to Dudley Children's 'Front Door' or the Multi Agency Support Team if the child resides in another local authority and/or the police **immediately** if you believe a child is suffering or likely to suffer from harm, or in immediate danger. **Anyone can make a referral.** This can be done via the Dudley **'Tell us'** page: https://safeguarding.dudley.gov.uk/tell-us/

See Appendix 3 for more information and contact details for other local authorities.

Tell the DSL or a Deputy DSL as soon as possible if you make a referral directly.

9.2 If a child discloses a safeguarding issue to you, you should:

- Listen to and believe them;
- Allow them time to talk freely and do not ask leading questions;
- Stay calm and do not show that you are shocked or upset;
- Tell the child they have done the right thing in telling you; do not tell them they should have told you sooner;
- Explain what will happen next and that you will have to pass this information on; do not promise to keep it a secret;
- Write up your conversation via CPOMS as soon as possible in the child's own words; stick to the facts and do not put your own judgement on it;
- If you do not have access to CPOMS, sign and date the write-up and alert the safeguarding team; alternatively, if appropriate, make a referral to children's social care and/or the police directly, and tell the DSL or a Deputy DSL as soon as possible that you have done so.

Aside from the above professionals, do not disclose the information to anyone else unless told to do so by a relevant authority involved in the safeguarding process.

It is also important to understand:

- The child may not feel ready, or know how to tell someone they are being abused, exploited, or neglected;

- They may not recognise their experiences as harmful;
- They may feel embarrassed, humiliated, or threatened; this could be due to their vulnerability, disability, sexual orientation and/or language barriers.

None of this should stop you from having 'professional curiosity' and speaking to the DSL or a member of the safeguarding team if you have concerns about a child.

10 Record Keeping

10.1

- We will hold records in line with our records retention schedule;
- All safeguarding concerns, discussions, decisions made and the reasons for those decisions, must be recorded in writing and submitted via CPOMS; if you are in any doubt about whether to record something, discuss it with a member of the safeguarding team;
- Confidential information and records will be held securely and only available to those who have a right or professional need to see them;
- Safeguarding records relating to individual children will be retained for as long as is necessary after they have left the College; this is normally until the child is 25 but some records will be retained for longer periods as outlined in the Data Protection Act 2018;
- If a child for whom the College has, or has had, safeguarding concerns moves to another institution, the DSL will ensure that their safeguarding and child protection file is forwarded promptly and securely (within five days of them starting at the new education setting when this information is made available), and separately from the main student file. In addition, if the concerns are significant or complex, and/or social services are involved, the DSL will speak to the DSL of the receiving school or college and provide information to enable them to have time to make any necessary preparations to ensure the safety of the child.

If the new education setting uses CPOMS, this request will be made automatically and processed by the DSL.

10.2 If you have concerns about a child (as opposed to believing a child is suffering or likely to suffer from harm or is in immediate danger) Appendix 3 illustrates the procedure to follow if you have any concerns about a child's welfare.

Where possible, speak to the DSL or a Deputy DSL first to agree a course of action.

If in exceptional circumstances the DSL or a Deputy DSL is not available, this should not delay appropriate action being taken. Speak to a member of the Senior Leadership Team and/or take advice from Local Authority Children's Social Care. Referrals should be made by completing a Request for Help and Support Form and returning it to the Children's Front Door or contact 0300 555 0050 (option 3).

To refer into Dudley Exploitation hub (DEx), complete a Request for Help and Support Form and return it to the Children's Front Door. For more information, visit Dudley's Child Exploitation page.

Make a referral to Local Authority Children's Social Care directly, if appropriate (see 'Referral' below). Share any action taken with the DSL or a Deputy DSL as soon as possible.

You can also seek advice at any time from the NSPCC helpline on 0808 800 5000. Share details of any actions you take with the DSL or a Deputy DSL as soon as practically possible.

11 Referral

11.1 If it is appropriate to refer the case to Local Authority Children's Social Care or the Police, the DSL or a Deputy DSL will make the referral or support you to do so. If you make a referral directly you must tell the DSL or a Deputy DSL as soon as possible.

The Local Authority will decide within one working day of a referral about what course of action to take and will let the person who made the referral know the outcome. The DSL or a Deputy DSL or person who made the referral must follow up with the Local Authority if this information is not made available, and ensure outcomes are properly recorded.

If the child's situation does not seem to be improving after the referral, the DSL or a Deputy DSL or person who made the referral must follow local escalation procedures to ensure their concerns have been addressed and that the child's situation improves. Advice and further information on Dudley Professional Resolution can be accessed from the Lead for Safeguarding in Education or directly via the Dudley Safeguarding Partnership website.

If the DSL or a member of the team is unavailable, this should not delay action.

If you have concerns about a child (as opposed to believing a child is suffering or likely to suffer from harm or is in immediate danger) Appendix 2 illustrates the procedure to follow if you have any concerns about a child's welfare.

12 Thresholds and Early Help

12.1 Early Help is taking action early and as soon as possible to provide support where problems are emerging for children, young people, and their families.

If Early Help is appropriate, the DSL or a Deputy DSL will generally lead on liaising with other agencies and setting up an inter-agency assessment as appropriate. Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead practitioner.

The DSL or a Deputy DSL will keep the case under constant review and the College will consider a referral to local authority children's social care if the situation does not seem to be improving. Timelines of interventions will be monitored and reviewed.

Dudley Safeguarding Partnership: Support Level Guidance and Framework should be considered when completing a 'Request for Help and Support' form. Note, if the concern is at Level 1, no referral is required, and professionals should contact Dudley's Family Information Service on 01384 814398 to obtain universal information about support available for young people and families.

12.2 View more information on Dudley Early Help Provision and the Department for Education's Early Help System Guide

13 When to be concerned

13.1 All staff, but especially the Designated Safeguarding Lead (and deputies) should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual abuse (including harassment and exploitation), domestic abuse in their own intimate relationships (teenage relationship abuse), criminal exploitation, serious youth violence, county lines, and radicalisation.

13.2 **Abuse:** a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear, or experience its effects. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children.

13.3 **Signs and Symptoms of Abuse**

Abuse, including neglect and exploitation, and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap.

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

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.
Emotional abuse may involve:

- Conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person;
- Not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate;
- Age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction;
- Seeing or hearing the ill-treatment of another;
- Serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children.

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether the child is aware of what is happening.

The activities may involve:

- Physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing;
- Non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet);
- Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy because of maternal substance abuse.

Once a child is born, neglect may involve a parent or carer failing to:

- Provide adequate food, clothing, and shelter (including exclusion from home or abandonment);
- Protect a child from physical and emotional harm or danger;
- Ensure adequate supervision (including the use of inadequate caregivers);
- Ensure access to appropriate medical care or treatment;
- It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

13.4 Child-on-child abuse

Child-on-child abuse is when children abuse other children. This type of abuse can take place inside or outside of college, face to face, online or simultaneously between the two.

Victims should be taken seriously, kept safe and never be made to feel like they are creating a problem for reporting abuse, sexual violence, or sexual harassment.

We recognise that children can abuse their peers. Abuse will never be tolerated or passed off as "banter", "just having a laugh" or "part of growing up".

We also recognise the gendered nature of child-on-child abuse, and all child-on-child abuse is unacceptable and will be taken seriously.

Child-on-child abuse can include:

- Bullying (including cyber-bullying, prejudice-based and discriminatory bullying);
- Abuse in intimate personal relationships between children (this is sometimes known as 'teenage relationship abuse');

- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse);
- Sexual violence, such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence);
- Sexual harassment, such as sexual comments, remarks, jokes, and online sexual harassment, which may be standalone or part of a broader pattern of abuse;
- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party;
- Consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery);
- Up skirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or alarm;
- 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);

If a student makes an allegation of abuse against another student:

- You must record the allegation and tell the DSL or a Deputy DSL, but do not investigate it;
- The DSL or a Deputy DSL will contact the Local Authority Children's Social Care team and follow its advice, as well as the police if the allegation involves a potential criminal offence;
- The DSL or a Deputy DSL will put a risk assessment and support plan into place for all children involved (including the victim(s), the child(ren) against whom the allegation has been made and any others affected) with a named person they can talk to if needed;
- The DSL or a Deputy DSL will contact the Children and Adolescent Mental Health Services (CAMHS), if appropriate.

Most cases of students hurting other students will be dealt with under our college's behaviour policy, but this child protection and safeguarding policy will apply to any allegations that raise safeguarding concerns. This might include where the alleged behaviour:

- Is serious, and potentially a criminal offence;
- Could put students in the College at risk;
- Is violent;
- Involves students being forced to use drugs or alcohol;
- Involves sexual exploitation, sexual abuse, or sexual harassment, such as indecent exposure, sexual assault, upskirting or sexually inappropriate pictures or videos (including sexting).

We will minimise the risk of Child-on-Child abuse by:

- Challenging any form of derogatory or sexualised language or behaviour, including requesting or sending sexual images;
- Being vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female students, and initiation or hazing type violence with respect to boys;
- Ensuring our curriculum helps to educate students about appropriate behaviour and consent;
- Ensuring students know they can talk to staff confidentially through our pastoral system;
- Ensuring staff are trained to understand that a student harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy.

13.5 Consensual and Non-consensual sharing of indecent images

This is a suggested approach based on guidance from the UK Council for Child Internet Safety for all staff 2017 and for DSLs and senior leaders.

Your responsibilities when responding to an incident:

If you are made aware of an incident involving consensual and non-consensual sharing of indecent images (also known as 'youth produced sexual imagery'), you must report it to the DSL or a member of the safeguarding team immediately.

You must not:

- View, download or share the imagery yourself, or ask a student to share or download it. If you have already viewed the imagery by accident, you must report this to the DSL or a Deputy DSL;
- Delete the imagery or ask the student to delete it;
- Ask the student(s) who are involved in the incident to disclose information regarding the imagery (this is the DSL's responsibility);
- Share information about the incident with other members of staff, the student(s) it involves or their, or other, parents and/or carers;
- Say or do anything to blame or shame any young people involved.

You should explain that you need to report the incident and reassure the student(s) that they will receive support and help from the DSL or a Deputy DSL.

13.6 Initial review meeting

Following a report of an incident, the DSL will hold an initial review meeting with appropriate college staff. This meeting will consider the initial evidence and aim to determine:

- Whether there is an immediate risk to student(s);
- If a referral needs to be made to the police and/or children's social care;
- If it is necessary to view the imagery to safeguard the young person (in most cases, imagery should not be viewed);
- What further information is required to decide on the best response;
- Whether the imagery has been shared widely and via what services and/or platforms (this may be unknown);

- Whether immediate action should be taken to delete or remove images from devices or online services;
- Any relevant facts about the students involved which would influence risk assessment;
- If there is a need to contact another school, college, setting or individual;
- Whether to contact parents or carers of the students involved (in most cases parents should be involved).

The DSL or a Deputy DSL will make an immediate referral to police and/or children's social care if:

- The incident involves an adult;
- There is 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 educational needs);
- What the DSL or a Deputy DSL knows about the imagery suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent;
- The imagery involves sexual acts and any student in the imagery is under 13;
- The DSL or a Deputy DSL has reason to believe a student is at immediate risk of harm owing to the sharing of the imagery (for example, the young person is presenting as suicidal or self-harming).

If none of the above apply then the DSL, in consultation with the Principal and other members of staff as appropriate, may decide to respond to the incident without involving the police or children's social care.

Further review by the DSL
If at the initial review stage, a decision has been made not to refer to police and/or children's social care, the DSL will conduct a further review.

They will hold interviews with the students involved (if appropriate) to establish the facts and assess the risks.

If at any point in the process there is a concern that a student has been harmed or is at risk of harm, a referral will be made to children's social care and/or the police immediately.

Informing parents or guardians
The DSL or a Deputy DSL will inform parents at an early stage and keep them involved in the process, unless there is a good reason to believe that involving them would put the student at risk of harm.

Referring to the police
If it is necessary to refer an incident to the police, this will be done through 101.

Recording incidents
All sharing of nudes/semi-nude incidents and the decisions made in responding to them will be recorded. Our record-keeping arrangements also apply to recording incidents.

Students will be informed of our procedures on this issue via our pastoral systems.

13.7 Female Genital Mutilation:

If you discover that FGM has taken place, or a student is at risk of FGM
The Department for Education's Keeping Children Safe in Education explains that FGM comprises 'all procedures involving partial or total removal of the external female genitalia, or other injury to the female genital organs.'

FGM is illegal in the UK and a form of child abuse with long-lasting, harmful consequences. It is also known as 'female genital cutting', 'circumcision' or 'initiation'.

Any teacher who discovers (either through disclosure by the victim or visual evidence) that an act of FGM appears to have been carried out on a student under 18 must immediately report this to the police, personally. This is a statutory duty, and teachers will face disciplinary sanctions for failing to meet it.

Unless they have been specifically told not to disclose, they should also discuss the case with the DSL and involve children's social care as appropriate.

Any other member of staff who discovers that an act of FGM appears to have been carried out on a student under 18 must speak to the DSL and follow our local safeguarding procedures.

The duty for teachers mentioned above does not apply in cases where a student is at risk of FGM or FGM is suspected but is not known to have been carried out. Staff should not examine students.

Any member of staff who suspects a student is at risk of FGM or suspects that FGM has been carried out **on any student (including those who are 18 or over)** must speak to the DSL and follow our local safeguarding procedures.

The DSL will make sure that staff have access to appropriate training to equip them to be alert to children affected by FGM or at risk of FGM.

13.8 Honour Based Abuse (including Forced Marriage)

So-called 'honour-based' abuse (HBA) encompasses incidents or crimes committed to protect or defend the honour of the family and/or community, including FGM, forced marriage, and practices such as breast ironing.

Abuse committed in this context often involves a wider network of family or community pressure and can include multiple perpetrators.

All forms of HBA are abuse and will be handled and escalated as such. All staff will be alert to the possibility of a child being at risk of HBA or already having suffered it. If staff have a concern, they will speak to the DSL, who will activate local safeguarding procedures.

13.9 Forced Marriage

Since February 2023 it has been a crime to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday, even if violence, threats, or another form of coercion are not used
(see Implementation of the Marriage and Civil Partnership (Minimum Age) Act 2022).

Forcing a person into marriage is a crime. A forced marriage is one entered without the full and free consent of one or both parties and where violence, threats, or any other form of coercion is used to cause a person to enter a marriage. Threats can be physical or emotional and psychological.

Staff will receive training around forced marriage and the presenting symptoms. We are aware of the 'one chance' rule; we may only have one chance to speak to the potential victim and only one chance to save them.

If a member of staff suspects that a student is being forced into marriage, they will speak to the student about their concerns in a secure and private place. They will then report this to the DSL.

The DSL will:

- Speak to the student about the concerns in a secure and private place;
- Activate the local safeguarding procedures and refer the case to the local authority's designated officer;
- Seek advice from the Forced Marriage Unit on 020 7008 0151 or fmu@fco.gov.uk
- Refer the student to an education welfare officer, pastoral tutor, learning mentor, or counsellor, as appropriate.

13.10 Child Criminal Exploitation

Child criminal exploitation (CCE) is a form of abuse where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into criminal activity, in exchange for something the victim needs or wants, and/or for the financial or other advantage of the perpetrator or facilitator, and/or through violence or the threat of violence.

The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse.

The victim can be exploited even when the activity appears to be consensual. It does not always involve physical contact and can happen online. For example, young people may be trafficked, forced to work in cannabis factories, modern slavery, coerced into moving drugs or money across the country (county lines), involved in gangs and knife crime, forced to shoplift, or pickpocket, or to threaten other young people.

Indicators of CCE can include a child:

- Appearing with unexplained gifts or new possessions;
- Associating with other young people involved in exploitation;
- Involved in gangs and knife crime;
- Suffering from changes in emotional wellbeing;
- Misusing drugs and alcohol;
- Going missing for periods of time or regularly coming home late;
- Regularly missing college or education;
- Not taking part in education.

If a member of staff suspects CCE, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the local authority's children's social care team and the police, if appropriate.

13.11 Child Sexual Exploitation

Child sexual exploitation (CSE) is a form of abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity, in exchange for something the victim needs or wants and/or for the financial advantage or increased status of the perpetrator or facilitator. It may, or may not, be accompanied by violence or threats of violence.

The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse.

The victim can be exploited even when the activity appears to be consensual. Children or young people who are being sexually exploited may not understand that they are being abused. They often trust their abuser and may be tricked into believing they are in a loving, consensual relationship.

CSE can include both physical contact (penetrative and non-penetrative acts) and non-contact sexual activity. It can also happen online. For example, young people may be persuaded or forced to share sexually explicit images of themselves, have sexual conversations by text, or take part in sexual activities using a webcam. CSE may also occur without the victim's immediate knowledge, for example through others copying videos or images.

In addition to the CCE indicators above, indicators of CSE can include a child:

- Having an older boyfriend, girlfriend, or partner;
- Suffering from sexually transmitted infections or becoming pregnant.

If a member of staff suspects CSE, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the local authority's children's social care team and the police, if appropriate.

13.12 Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare.

The DSL and deputies will be aware of contact details and referral routes into the local housing authority so they can raise/progress concerns at the earliest opportunity (where appropriate and in accordance with local procedures).

Where a child has been harmed or is at risk of harm, the DSL or a Deputy DSL will also make a referral to children's social care.

13.13 Domestic Abuse

Children can witness and be adversely affected by domestic abuse and/or violence at home where it occurs between family members. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Older children may also experience domestic abuse and/or violence in their own personal relationships.

Exposure to domestic abuse and/or violence can have a serious, long-lasting emotional and psychological impact on children.

If police are called to an incident of domestic abuse and any children in the household have experienced the incident, the police will inform the key adult in college (usually the designated safeguarding lead) before the child or children arrive at college the following day. West Midlands police forces are part of Operation Encompass.

The DSL will provide support according to the child's needs and update records about their circumstances.

13.14 Child-on-Child Sexual Violence and Sexual Harassment

Sexual violence and sexual harassment can occur between two children of any age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Sexual violence and sexual harassment exist on a continuum and may overlap; they can occur online and face to face (both physically and verbally) and are never acceptable.

Responding to reports of sexual violence and sexual harassment

Reports of sexual violence and sexual harassment are likely to be complex and require difficult professional decisions to be made, often quickly and under pressure. Preplanning, effective training and effective policies will provide schools and colleges with the foundation for a calm, considered and appropriate response to any reports.

Ultimately, the College will make any decisions on a case-by-case basis, with the designated safeguarding lead (or a deputy) taking a leading role and using their professional judgement, supported by other agencies, such as children's social care and the police as required.

Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, likely, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same college.

If a victim reports an incident, it is essential that staff make sure they are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting any form of abuse or neglect. Nor should a victim ever be made to feel ashamed for making a report.
When supporting victims, staff will:

- Reassure victims that the law on child-on-child abuse is there to protect them, not criminalise them
- Regularly review decisions and actions, and update policies with lessons learnt
- Look out for potential patterns of concerning, problematic or inappropriate behaviour, and decide on a course of action where we identify any patterns
- Consider if there are wider cultural issues within the school that enabled inappropriate behaviour to occur and whether revising policies and/or providing extra staff training could minimise the risk of it happening again
- Remain alert to the possible challenges of detecting signs that a child has experienced sexual violence and show sensitivity to their needs.

Some groups are potentially more at risk. Evidence shows that girls, children with SEN and/or disabilities, and lesbian, gay, bisexual, and transgender (LGBT) children are at greater risk.

Staff should be aware of the importance of:

- Challenging inappropriate behaviours
- Making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up
- Challenging physical behaviours (potentially criminal in nature), such as grabbing bottoms, breasts, and genitalia, pulling down trousers, flicking bras and lifting up skirts; dismissing or tolerating such behaviours risks normalising them

If staff have any concerns about sexual violence or sexual harassment, or a child makes a report to them, they will follow the reporting procedures within school ensuring that the DSL or a Deputy DSL is informed immediately.

13.15 Radicalisation and Extremism

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

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

Terrorism is an action that:

- Endangers or causes serious violence to a person/people;
- Causes serious damage to property; or
- Seriously interferes or disrupts an electronic system.

The use or threat of terrorism must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious, or ideological cause.

Colleges have a duty to prevent children from being drawn into terrorism. The DSL and the Deputy DSLs will undertake Prevent awareness training and make sure that staff have access to appropriate training to equip them to identify children at risk.

We will assess the risk of children in our college being drawn into terrorism. This assessment will be based on an understanding of the potential risk in our local area, in collaboration with our local safeguarding partners and local police force.

We will ensure that suitable internet filtering is in place and equip our students to stay safe online at college and at home.

There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. Radicalisation can occur quickly or over a long period.

Staff will be alert to changes in students' behaviour.

The Community Safety Officer for Dudley is Mark.Wilson@dudley.gov.uk

The government website Educate Against Hate and charity NSPCC say that signs that a student is being radicalised can include:

- Refusal to engage with, or becoming abusive to, peers who are different from themselves;
- Becoming susceptible to conspiracy theories and feelings of persecution;
- Changes in friendship groups and appearance;
- Rejecting activities, they used to enjoy;
- Converting to a new religion;
- Isolating themselves from family and friends;
- Talking as if from a scripted speech;
- An unwillingness or inability to discuss their views;
- A sudden disrespectful attitude towards others;
- Increased levels of anger;
- Increased secretiveness, especially around internet use;
- Expressions of sympathy for extremist ideologies and groups, or justification of their actions;
- Accessing extremist material online, including on Facebook or Twitter;
- Possessing extremist literature;
- Being in contact with extremist recruiters and joining, or seeking to join, extremist organisations.

Children who are at risk of radicalisation may have low self-esteem or be victims of bullying or discrimination. It is important to note that these signs can also be part of normal teenage behaviour, staff should have confidence in their instincts and seek advice if something feels wrong.

If staff are concerned about a student, they will follow our reporting procedures including discussing their concerns with the DSL or a Deputy DSL.

Staff should always act if they are worried.

Further information on the College's measures to prevent radicalisation are set out in other college policies and procedures, including:

Computer Misuse Policy
Student Behaviour Policy

If you have concerns about extremism

If a child is not suffering or likely to suffer from harm, or in immediate danger, where possible speak to the DSL first to agree a course of action.

If in exceptional circumstances the DSL or a Deputy DSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or seek advice from local authority children's social care. Make a referral to local authority children's social care directly, if appropriate (see 'Referral' above). Inform the DSL or deputy as soon as practically possible after the referral.

Where there is a concern, the DSL will consider the level of risk and decide which agency to make a referral to. This could include the local authority children's social care team or to Prevent.

The Department for Education also has a dedicated telephone helpline, 020 7340 7264, which college staff and governors can call to raise concerns about extremism with respect to a student. You can also email counter.extremism@education.gov.uk. Note that this is not for use in emergency situations.

In an emergency, call 999 or the confidential anti-terrorist hotline on 0800 789 321 if you:

- Think someone is in immediate danger;
- Think someone may be planning to travel to join an extremist group;
- See or hear something that may be terrorist related.

Staff will also receive training and have due regard to the Prevent Duty Guidance 2023

13.16 Mental Health: if you have a mental health concern about a student

Mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

The Senior Designated Mental Health Lead is Sarah MacKenzie (Assistant Principal).

Staff will be alert to behavioural signs that suggest a child may be experiencing a mental health problem or be at risk of developing one.

If you have a mental health concern about a child that is also a safeguarding concern, take immediate action.

If you have a mental health concern that is not also a safeguarding concern, report this to the student's Personal or Lead Tutor; they will speak to the DSL or a Deputy DSL if necessary to agree a course of action.

14 LGBTQI+ Students

14.1 Some students may be vulnerable due to their sexual orientation or gender identity, either because they are subject to homophobic, biphobic or transphobic bullying or because of negative responses from parents/carers or others, which may result in increased risk of self-harm, suicide, or homelessness.

Several studies also evidence that LGBTQI+ young people may be at increased risk of becoming victims of CSE.

The College is aware of these increased risk factors and knows how to access appropriate support for these young people when required.

15 Online Safety and the use of Mobile Technology

15.1 The College is aware of and implements the Government guidance on Searching, screening and confiscation: guidance for schools and Teaching online safety in schools

Staff receive online safety training at induction and regular updates including:

- Safe internet use;
- Online safeguarding issues including cyber-bullying and online radicalisation;
- The expectations, roles and responsibilities around filtering and monitoring.

All staff will receive refresher training as required and at least once each academic year.

Staff are also aware of restrictions placed on them with regards to the use of mobile phones and cameras (see our Photography and Filming Policy). Staff are allowed to bring personal phones to college for their own use but will limit such use to non-contact time when students are not present.

Students are taught about safeguarding and being safe online through the tutorial programme, including:

- how to report concerns, including cyber-bullying where they are the victim or a witness;
- the safe use of social media, the internet and technology;
- keeping personal information private;
- how to recognize unacceptable online behaviour.

Parents/guardians are educated about online safety via our website and communications sent directly to them. We also share safeguarding procedures with them, so they know how to raise concerns about online safety. They are made aware that staff can search students' phones as set out in the Depart for Education's guidance (above).

The College has web filtering and monitoring in place to protect students through the Wi-Fi network and activity is continuously monitored and reported on. This limits their exposure to the four main categories of risk:

Content – being exposed to illegal, inappropriate, or harmful content, such as pornography, fake news, racism, misogyny, self-harm, suicide, antisemitism, radicalisation, and extremism;

Contact – being subjected to harmful online interaction with other users, such as peer-to-peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes;

Conduct – personal online behaviour that increases the likelihood of, or causes, harm, such as making, sending, and receiving explicit images (e.g., consensual, and non-consensual sharing of nudes and semi-nudes and/or pornography), sharing other explicit images and online bullying; and

Commerce – risks such as online gambling, inappropriate advertising, phishing and/or financial scams.

This also enables us to identify any students at risk who are then followed up and provided with support as necessary.

Staff and students are signposted to and understand our Computer Misuse Policy which includes the sanctions we will use if they are in breach of it.

16 Virtual Lessons and Contact

16.1 We are committed to providing a safe and secure learning environment for all our students, even in the virtual realm. We recognize the importance of ensuring that children are safe, respected, and supported during these lessons.

Child-Centred Approach - we prioritize the best interests of the child at all times, ensuring their safety, welfare, and educational needs are paramount;

Equal Treatment - we treat all children equally and without discrimination, regardless of their age, gender, race, ethnicity, religion, disability, or any other characteristic;

Inclusivity - we aim to create an inclusive and supportive learning environment where all children feel valued and can participate actively; and

Transparency - we are transparent in our actions and communications, ensuring that both students and parents/guardians are informed about the nature and expectations of virtual lessons;

16.2 Staff

Training - all staff involved in virtual lessons undergo training on child protection and receive guidance on best practice for online safety;

Supervision - staff must supervise virtual lessons to ensure appropriate conduct and behaviour; they should be vigilant for any signs of distress or discomfort among students; and

Reporting -any concerns or suspicions of child abuse or neglect must be reported promptly to the designated child protection officer or relevant authorities.

16.3 Parents/Guardians

Communication - parents/guardians should communicate any concerns about their child's online experiences to the school/organization;

Privacy - parents/guardians are encouraged to educate their child about online privacy and safety and are provided with information via our website and other communications.

16.4 Students

Respectful Behaviour - students are expected to behave respectfully towards staff and peers during virtual lessons;

Reporting - students should feel comfortable reporting any inappropriate conduct or concerns to a trusted adult.

16.5 Online Safety Measures

Secure Platforms: we use secure and trusted online platforms for virtual lessons to ensure a safe digital environment;

Privacy Settings - all virtual lessons will be conducted with privacy settings that protect the identity and information of our students;

Access Control - only registered students and authorized personnel will have access to virtual lessons.

16.6 Communication

Clear and open communication is crucial for the success of virtual lessons.

We will:

- Provide parents/guardians with information about the virtual lessons;
- Maintain open channels of communication between staff, parents/guardians, and students for reporting concerns or seeking guidance.

16.7 Incident Response

In the event of an incident or concern, we will:

- Take immediate action to ensure the safety and well-being of the child involved;
- Follow the established procedures for reporting and addressing child protection concerns, including involving relevant authorities if necessary.

17 Children who are absent from college/education

17.1 School leavers still must do one of the following until they turn 18:

- Stay in full-time education;
- Start an apprenticeship or traineeship;
- Spend 20 hours or more a week working or volunteering alongside part-time education.

A child being absent from college/education, particularly repeatedly, can be a warning sign of a range of safeguarding issues. This might include abuse or neglect, such as sexual abuse or exploitation or child criminal exploitation, or issues such as mental health problems, substance abuse, radicalisation, FGM or forced marriage.

There are many circumstances where a child may become missing from education, but some children are particularly at risk. These include children who:

- Are at risk of harm or neglect;
- Are at risk of forced marriage or FGM;
- Come from Gypsy, Roma, or Traveller families;
- Come from the families of service personnel;
- Go missing or run away from home or care;
- Are supervised by the youth justice system;
- Cease to attend college;
- Come from new migrant families.

We will follow our procedures for unexplained absence and for dealing with students who are absent from college/education, particularly on repeat occasions, to help identify the risk of abuse and neglect, including sexual exploitation. This includes liaising with

parents/guardians, informing Connexions (or their equivalent) that they have left college and offering careers information, advice, and guidance to help them find an alternative provider.

Staff will be trained in signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns which may be related to being missing, such as travelling to conflict zones, FGM and forced marriage.

If a staff member suspects that a child is suffering from harm or neglect, we will follow local child protection procedures, including with respect to making reasonable enquiries. We will make an immediate referral to the local authority children's social care team, and the police, if the child is suffering or likely to suffer from harm, or in immediate danger.

18 Designated Teacher for Looked-After Children and Previously Looked-After Children

We have appointed a designated teacher, Anna Smith (Faculty Director) who is responsible for promoting the educational achievement of Looked-After Children and Previously Looked-After Children in line with Statutory Guidance She is appropriately trained and has the relevant qualifications and experience to perform the role.

As part of their role, the designated teacher will:

- Work closely with the DSL to ensure that any safeguarding concerns regarding Looked-After Children and Previously Looked-After Children are quickly and effectively responded to;
- Work with external agencies to promote the educational achievement of Looked-After Children and Previously Looked-After Children, including discussing how bursary and free school meals funding can be best used to support them and meet the needs identified in their personal education plans.

We will ensure that staff have the skills, knowledge and understanding to keep Looked-After Children and Previously Looked-After Children safe. We will ensure that:

- Appropriate staff have relevant information about their looked-after legal status, contact arrangements with birth parents or those with parental responsibility, and care arrangements;
- The DSL has details of children's social workers and virtual school heads (if relevant).

19 Students with a Social Worker

Students may need a social worker due to safeguarding or welfare needs. We recognise that a child's experiences of adversity and trauma can leave them vulnerable to further harm as well as potentially creating barriers to attendance, learning, behaviour, and mental health.

The DSL and all members of staff will work with and support social workers to help protect vulnerable children.

Where we are aware that a student l has a social worker, the DSL will always consider this fact to ensure any decisions are made in the best interests of the student's safety, welfare, and educational outcomes. For example, it will inform decisions about:

- Responding to unexplained absences where there are known safeguarding risks;
- The provision of pastoral and/or academic support.

20 Children with Special Educational Needs and Disabilities

We recognise that students with special educational needs (SEND) and disabilities can face additional safeguarding challenges. Additional barriers can exist when recognising abuse and neglect in this group, including:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration;
- Students being more prone to peer group isolation than other students;
- The potential for students with SEND and disabilities being disproportionally impacted by behaviours such as bullying, without outwardly showing any signs;
- Communication barriers and difficulties in overcoming these barriers.

We offer extra pastoral support for students with SEND and disabilities. This includes an experienced Personal Tutor, support from an Inclusion Coordinator and access to the Retreat (a smaller safe study space in college). Our SENCo, Lowri Saenger, is also a Deputy Designated Safeguarding Lead.

21 Safeguarding in the Curriculum

All classroom-based and student-facing staff have received extensive training on preventative safeguarding including trauma informed practice and creating a safe classroom where good mental health and wellbeing are promoted.

Safeguarding is included in the tutorial curriculum and addressed via assemblies and other events.

In keeping with the ethos of this policy's aims and protection measures, teaching staff and the Principal, as Head of Centre, will ensure that performances and coursework are suitable for the college setting and the 16-19 age group. All content and themes of assessed performances and coursework must be considered within the context of the College's safeguarding duties and responsibilities.

22 Allegations against Staff

22.1 All staff should be aware of and follow the staff's code of conduct, which included guidance about conduct and safe practice, including the use of mobile phones. Further information is available via our Managing Allegations Trust policy.

22.2 We understand that a student may make an allegation against a member of staff; in these cases, we will follow statutory guidance in Keeping Children Safe in Education 2024 and DPSS procedures for managing allegations.

Please refer to our Trust Whistleblowing Policy

22.3 If you have concerns about a member of staff (including a supply teacher or volunteer), or an allegation is made about a member of staff (including a supply teacher or volunteer) posing a risk of harm to children, you must speak to **the Principal** who will discuss the content of the allegation with the Local Authority Designated Officers, Yvonne Nelson-Brown, via 01384 813110/Yvonne.Nelson-Brown@dudley.gov.uk, or Sukhchandan Kaur via 01384 813066 /Sukhchandan.Kaur@dudley.gov.uk, or call the General line: 01384 813061 or email Allegations@dudley.gov.uk

If the concerns/allegations are about the Principal, you must speak to the Chair of Governors.

The College will work with other agencies to investigate when a member of staff or a supply teacher has 'behaved or may have behaved in a way that indicates they may not be suitable to work with children'.

23 Staff concerns that do not meet the harm threshold/Low Level Concerns

23.1 Staff concerns that do not meet the harm threshold, also known as 'low level' concerns, is any concern – no matter how small – that an adult working in or on behalf of the College may have acted in a way that;

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

Examples of such behaviour could include, but are not limited to:

- Being over friendly with students;
- Having favourites;
- Taking pictures of students on their mobile phone, contrary to College policy;
- Engaging with a student on a one-to-one basis is a secluded area or behind a closed door, or
- Humiliating students.

23.2 We recognize the importance of creating a culture of openness, trust, and transparency; all staff are encouraged to share low-level concerns so they can be addressed appropriately. We will create this culture by:

- Ensuring staff are clear about what appropriate behaviour is and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour (in themselves and others);
- Empowering staff to share low-level concerns and self-refer;
- Addressing unprofessional behaviour and supporting the individual to correct it at an early stage;
- Providing a responsive, sensitive, and proportionate handling of such concerns when they are raised;
- Helping to identify any weaknesses in the College's safeguarding system.

23.3 If a concern is raised by a third party, the Principal (or a nominated deputy) will collect as much evidence as possible by speaking:

- Directly to the person who raised the concern, unless it has been raised anonymously;
- To the individual involved and any witnesses;

The Principal will use the information to categorise the type of behaviour and determine any further action, in line with the College's code of conduct.

23.4 All staff concerns that do not meet the harm threshold/low-level concerns will be recorded in writing. In addition to details of the concern, records will include the context in which the concern arose, any action taken and the rationale for decisions and action taken.

Records will be:

- Kept confidential, held securely, and comply with the DPA 2018 and UK GDPR;
- Reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern is identified, we will decide on a course of action through our disciplinary procedures or, where a pattern of behaviour moves from a concern to meeting the harms threshold, we will refer to the LADO;
- Retained at least until the individual leaves employment at the College.

24 Visitors

24.1 All visitors will be required to verify their identity to the satisfaction of staff; if the visitor is unknown to the setting, we will check their credentials and reason for visiting before allowing them to enter the setting. Visitors should be ready to produce identification, will be asked to sign in and wear a visitor's badge. View the Visitor Policy in full here.

24.2 All other visitors, including visiting speakers, will always be accompanied by a member of staff. We will not invite any speaker into the College who is known to disseminate extremist views; we will carry out appropriate checks to ensure that any individual or organisation using college facilities is not seeking to disseminate extremist views or radicalise students or staff.

25 Raising a Concern

25.1 We strive to achieve high standards in the discharge of our responsibilities and welcome feedback on all aspects of our work, recognising this is invaluable in helping us make improvements and minimise the likelihood of concerns reoccurring. Where a concern does arise, we will treat the matter seriously and openly and in a way that is fair to all parties.

Our Complaints and Concerns Policy is available on our website.

Date of review	Date agreed	JCC	Governors	Review date	Comments
September 2024	September 2024	10 September 2024	LGB 18 September 2024	September 2025	

Appendix 1

Dudley Safeguarding People Partnership

LADO PROCESS FLOWCHART – ALLEGATIONS/CONCERNS AGAINST STAFF IN PAID OR VOLUNTARY POSITION

It is your duty to IMMEDIATELY report concerns to your Designated Safeguarding Lead (DSL)/Manager. If you feel that your concern has not been dealt with appropriately you have a duty to report your concern directly.

As defined by Working Together (2023) and Keeping Children Safe in Education (2024) - an allegation has been made whereby a person working (employed or volunteer) with children may have:

- Behaved in a way that has harmed a child, or may have harmed a child
- Possibly committed a criminal offence against or related to a child or
- Behaved towards a child or children in a way that indicates they may pose a risk of harm to children
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children

If an allegation is made against any adult who comes into contact with children in either a paid or unpaid capacity , the DSL/Manager/Employer MUST contact the Designated Officer (LADO) within 1 (one) working day.

For Early Years/Childcare providers please contact:

For Yvonne Nelson-Brown – 01384 813110
For Sukhchandan Kaur - 01384 813066
General line: 01384 813061
allegations@dudley.gov.uk
AND Ofsted 0300 123 1231

For Any other professional organisations please contact:

For Yvonne Nelson-Brown – 01384 813110
For Sukhchandan Kaur – 01384 813066
General line: 01384 813061
allegations@dudley.gov.uk

Step 1: Contact LADO discussion to take place in regards to initial planning and whether the member of staff/person concerned is to be informed of the allegation; the LADO will ask you to complete a referral form.

Step 2. For Allegations/concerns/ongoing risk to a child you must also make a referral to MASH on 0300 555 0050.

(MASH hours are 9am–5pm Monday to Friday or out of hours contact the Emergency Duty Team – 0300 555 8574)

A Position of Trust (PoT) meeting may be convened to consider the allegation and plan any further enquiries/investigation – this is a multi-agency meeting which will include attendance from your agency and may include the Police, Childrens Social Care and Ofsted.

PoT meetings are chaired by the LADO to exchange information and to decide on a formal investigation processes.

(There are occasions when investigations are in process before a PoT is convened these are usually when the allegation has been made directly to the Police.)

a) Following the LADO referral, if an allegation is false or unfounded → There is NO Social Care or Police investigation → There is no further action but refer to LA Children's Social Care or Police if allegation is deliberately invented.

b) If an allegation is founded and possible disciplinary procedures or potential criminal proceedings. → There is involvement with Social Care and/or a Police investigation. A S47/Strategy discussion between Social Care & Police is held to consider appropriate response. e.g. whether single or multi agency meeting is necessary.

If a child has suffered or is likely to suffer significant harm. → LADO discuss with Children's Social Care the need for a PoT meeting

No significant harm but allegation might constitute a criminal offence. → LADO to discuss with Police for an initial evaluation

It is the employer's responsibility to share info to all professionals involved.

You decide upon action to safeguarding children and young people within your establishment. i.e. staff suspension, restricted duties, etc.

If the allegation is FOUNDED. It is the employers responsibility make a referral to DBS service and/or to other regulation bodies, e.g. TRA, HCPC, Sports Associations, etc. informing them of the outcome of the allegation.

If you are an Early Years/Childminder setting you must contact Ofsted. They will decide on any action i.e. withdraw registration and will liaise on the referral to the DBS – 01325 953795.

REMEMBER.....

Is the child safe?
Make sure to document everything. Do not investigate.
If in doubt seek advice from LADO

Appendix 2

You have concerns about a child
Speak to the DSL
Referral not required. School takes relevant action and monitors locally
You or the DSL make a referral to the LA's social care team (and call the police if appropriate)
If concerns escalate, make a referral
Within 1 working day, a social worker makes a decision about the type of response required
LA's social care team takes action and informs the referrer
No formal assessment required
School considers early help assessment and accesses other support as appropriate
Staff keep the child's circumstances under review, and re-refer if appropriate, to ensure the circumstances improve. The child's best interest must always come first at all stages.

Appendix 3

Making a Referral to Children's Services: Information for all Staff

If a serious safeguarding or child protection situation occurs where it is not possible to contact a safeguarding lead, please follow the steps below and then contact the DSL or a Deputy as soon as possible.

If a child is at imminent/significant risk of harm/immediate danger you should **call 999** in the first instance (for police and/or ambulance).

Anyone can make a referral to Children's Services. It is important that you determine where the student lives, so you can contact the appropriate organisation. It is useful if you can also provide the following:

- Full name of student
- Date of birth
- Address
- Telephone numbers of parents/carers and student
- Names and dates of birth of any siblings and the school they attend (if appropriate)

Contact Details

DUDLEY:

Telephone: 0300 555 0050

Emergency out-of-hours: 0300 555 8574

SANDWELL:

0121 569 3100 (out of office hours is the same number)

BIRMINGHAM:

Telephone: 0121 303 1888

Emergency out-of-hours: 0121 675 4806

WOLVERHAMTON:

Telephone: 01902 555392

Emergency out-of-hours: 01902 552999

SHROPSHIRE:

Telephone: 0345 678 9021

Emergency out-of-hours: 0345 6789040

STAFFORDSHIRE:

Telephone: 0800 1313 126

Emergency out of hours: 0345 604 2886

WORCESTERSHIRE:

Telephone: 01905 822666

Emergency out of hours: 01905 768020.

If you are concerned about a child who does not attend this college, you can contact the NSPCC via help@nspcc.org.uk or 0808 800 5000