



cadburycollege

## **Safeguarding (Child Protection)**

### **Policy and Procedures (including Prevent)**

**2019/20  
Academic Year**

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# 1. Designated Staff Responsible for Safeguarding (including Prevent)

Executive Team Member Responsible for Safeguarding: David Holden  
 Nominated Safeguarding Governor: TBC

Designated Safeguarding Lead (DSL): Paul Smith

Deputy Safeguarding Lead: Ann Hay  
 Deputy Safeguarding Lead (Cadbury) Amie Banford

Safeguarding Officer Kirsty Wealthall

## **CENTRAL CAMPUS & CENTRAL ST MICHAELS**

The college has three dedicated full time staff for Safeguarding, Paul Smith, Ann Hay and Kirsty Wealthall.

The office location for Safeguarding is room UG21 and this dedicated area has an open door policy with access to the team in a confidential setting.

**Normal working hour's information (Monday – Thursday 8:30am - 5.00pm and Friday 8.30am – 3:30 pm**

**Dial 0 (Switchboard) and ask to be connected to a Safeguarding Officer**

<b>Campus</b>	<b>Central Emergency Location</b>	<b>Name and Responsibility</b>	<b>Contact Details</b>
Central Campus	Safeguarding Room (UG21)	Paul Smith, Designated Prevent & Safeguarding Lead (DSL)	Internal: 528890 External: 0121 667 5101
Central Campus	Safeguarding Room (UG21)	Ann Hay, Deputy Designated Safeguarding Lead	Internal: 307280 External: 0121 667 5101
Central Campus	Safeguarding Room (UG21)	Kirsty Wealthall, Safeguarding Officer	Internal: 536285 External: 0121 667 5101
Central Campus	Learner Hub (3 <sup>rd</sup> Floor)	Naomi Lear, Welfare/Safeguarding Officer	Internal: 344590 External: 0121 667 5239
Central Campus	Learner Hub (3 <sup>rd</sup> Floor)	Emma Harris Welfare/Safeguarding Officer	Internal: 422039 External: 0121 667 5073

Central Campus		Elaine Groves, Vocational Access Studies (VAS)	Internal: 369844 External: 0121 667 5404
Central Campus		Sarah-Jane Shaylor Vocational Access Studies (VAS)	Internal: 578199
Central St Michael's	Office, 3 <sup>rd</sup> floor	David Craik Safeguarding and Prevent Team Member	Internal: 546977
Future Skills		Tony Robinson, Manager Safeguarding Officer	Internal: 593667

### **Cadbury College**

	<b>Central Emergency Location</b>	<b>Name and Responsibility</b>	<b>Contact Details</b>
Cadbury College		Amie Banford, Deputy Designated Safeguarding Lead	Internal: 626349
Cadbury College		Christine Preece	Internal: 625658

### **Contacting Safeguarding Staff**

A member of Safeguarding staff needs to be contacted **without delay** for serious and urgent concerns.

**ALWAYS** attempt to speak to a member of Safeguarding staff in person about a concern.

**Do NOT** use email to report concerns, speak to Safeguarding staff directly and Pro-monitor (Confidential Comments) should be used to provide written information and for follow up actions.

If you do send an email please send to the designated Safeguarding (confidential and secure) email address\*: [Safeguarding@sandwell.ac.uk](mailto:Safeguarding@sandwell.ac.uk)

**Do NOT** send concerns to a named member of staff.

**ALWAYS** follow up a concern if you have not had a reply.

## 2. Purpose of the Safeguarding Policy

The college is committed to safeguarding and promoting the wellbeing of its students.

The college recognise that it is the responsibility of **all** staff to ensure that all students are safe and feel safe in the college environment.

Safeguarding and promoting the welfare of children is defined (as per the statutory definition, Keeping Children Safe in Education, 2019) and for the purposes of this guidance as:

- Protecting children from maltreatment;
- Preventing impairment of children's 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.

Everyone who comes into contact with children, vulnerable adults and their families has a role to play in safeguarding young people, vulnerable adults and our learning and working community. Members of staff are particularly important as they are in a position to identify concerns early, to provide support and to prevent concerns from escalating and becoming a serious case.

The College recognises and embraces that it forms part of a wider safeguarding framework and system. This framework and system is described in full detail in the statutory guidance 'Working Together to Safeguard Children' (2018).

This policy encompasses all aspects of child protection and safeguarding including e-safety, bullying and harassment (in person or electronically) and due regard to the prevention of young people becoming extremist in their views and or actions, or being radicalised. This policy should be read in conjunction with the relevant statutory guidance 'Keeping Children Safe in Education' (September 2019).

The College recognises a number of associated policies, procedures and other documents relating to safeguarding. This policy should be read in conjunction with those as listed below:

Relevant Policies:

- Anti-Bullying and Harassment Policy
- Criminal Convictions Policy
- Fitness to Study Policy
- Fundamental British Values Policy
- Managing Events and Outside Speakers Policy
- Photography Policy
- Safeguarding Professional Boundaries Policy
- Self-Harm and Suicidal Behaviour Prevention Policy
- Substance Misuse Policy
- Transgender Policy
- Visitor Policy

### 3. Key Roles and Responsibilities

#### The Role of the Governing Body

The governing body is committed to ensuring that the College:

- Provides a safe environment for young people, vulnerable adults and all within our learning community.
- Identifies young people and vulnerable adults who are suffering, or likely to suffer, significant harm, and
- Takes appropriate action to see that young people and vulnerable adults are kept safe, both at home and at the College.
- Promotes an environment and culture in which every learner feels valued and able to communicate their wishes and feelings successfully.
- Ensures that there is a designated safeguarding lead and college safeguarding team.
- All staff including governance receive safeguarding training which is regularly updated.

#### Senior Staff with Designated Lead Responsibility

The college will ensure that all relevant procedures and recommendations set out by the local Children Trust(s) will be followed to:

- Ensure there is a designated member of the College SMT responsible for safeguarding. The member of the SMT is David Holden, Vice Principal
- Ensure there is a designated senior member of staff for safeguarding who has received appropriate training and support for this role. The Designated Safeguarding Lead (DSL) is Paul Smith.
- Ensure there is a Deputy Designated Safeguarding Lead (DDSL), with clearly defined responsibilities who will provide support to the DSL.
- Ensure all members of staff know the names of Safeguarding staff.
- Ensure all members of staff understand their responsibilities in referring any concerns to Safeguarding.
- Ensure all staff receive training to the required level which is updated as required. Records of safeguarding training to be kept centrally by Human Resources.
- Ensure all relevant safeguarding procedures are kept up-to-date in line with legislation and local Children Trust recommendations.
- Develop effective links with relevant agencies and cooperate as required with requests.
- Attend safeguarding meetings and case conferences.
- Keep written records of reported safeguarding issues.
- Ensure all records are kept securely.
- Provide a termly report on safeguarding to the Governing Body.

## **Role of Staff with Lead Responsibility**

The Senior Staff with lead responsibilities are responsible for raising awareness within the staff of issues relating to the welfare of young people, and the promotion of a safe learning environment within the College. They will undertake training in child protection issues and inter-agency working, as required by the Local Children Service(s) and will receive refresher training at least every 2 years, and will keep up to date with developments in child protection issues.

## **Other college roles involved in the prevention of abuse:**

### **Human Resources – Safer Recruitment**

The College pays full regard to 'Keeping Children Safe in Education'. Safer recruitment practice includes scrutinising applicants, verifying identity and academic or vocational qualifications, obtaining professional and character references, checking previous employment history and ensuring that a candidate has the health and physical capacity for the job.

Candidates are informed of the need to carry out enhanced criminal records checks (DBS checks) before posts can be confirmed. Where applications are rejected because of information that has been disclosed, applicants have the right to know and to challenge incorrect information.

We undertake criminal record checks (DBS) for all staff and volunteers, to ensure that no disqualified person or unsuitable person works at the setting or has access to the children.

The College's recruitment procedures are reviewed regularly to ensure that they take into account safe recruitment.

### **The Curriculum**

Safeguarding and Prevent are covered and highlighted within the curriculum schemes of work. Relevant issues will be addressed through all areas of the curriculum.

## **4. Safeguarding Ethos**

The College recognises the importance of students feeling safe, and feel they are in an environment to disclose abuse. The college will endeavour to support students by:

- Ensuring the content of the curriculum, particularly tutorials include relevant information and content.
- Providing a positive secure environment where students feel valued and supported.
- Implementing a code of conduct to which students sign up.

All of our learners, including children, young people and vulnerable adults, regardless of age, disability, gender, racial heritage, religious belief and sexual orientation or identity have the right to protection from harassment, harm or abuse.

### **Safe Working Practices**

The College has developed procedures for Codes of Practice for staff to understand and agree in relation to professional conduct with students.

All staff have access, to the “Safeguarding Professional Boundaries Policy”.

The college has fully operational Health and Safety Policy and Procedures.

## **5. Safeguarding Culture – ‘Safeguarding is everyone’s responsibility’**

**All** members of the College community, including staff paid and unpaid, college governors, learners, sub-contracted and franchised staff, volunteers and visitors are responsible and have a collective responsibility for safeguarding and in promoting the welfare of young people and vulnerable adults. All of these groups within our college community will be made aware of the College Safeguarding policy. We are committed to create a 'culture of safety' in which all learners and members of our college community are protected from abuse and harm in all areas of its service delivery.

Responsibility for protection of our learners, including young people and vulnerable adults must be shared because people are safeguarded only when all relevant agencies and individuals accept responsibility, work with and co-operate with one another. The learning environment will be one in which our learners feel safe, secure, listened to, valued and respected, and are actively encouraged and supported through the curriculum offer, support, work experience, placement and training areas to raise and report on any concerns they have about their own safety and welfare. Children who are abused or at risk of abuse will be supported within college.

Disclosures regarding any incidents relating to abuse or neglect and allegations against persons in a position of trust made by young people or vulnerable adults must always be taken seriously and reported swiftly in line with the College procedures, and with due regard to the privacy of the child, young person or vulnerable adult and their family.

Safeguarding Children Procedures provide a clear robust framework for swiftly raising concerns or reporting an incident or case relating to an individual or group. All procedures should be read and understood by all the College community. All staff will understand that in ‘exceptional circumstances’ they may report concerns directly to the relevant Children Services.

The College will support staff by providing an opportunity to talk through their anxieties and concerns with the Designated Members of Staff for safeguarding including where they have been directly involved in a safeguarding or Prevent incident/case and need reassurance, advice and help.

## 6. Confidentiality, communication, record keeping and information sharing

Information sharing is vital in identifying and tackling all forms of abuse. Whilst the Data Protection Act 2018 and the General Data Protection Regulations 2018 places duties on organisations and individuals to process personal information fairly and lawfully and to keep the information they hold safe and secure, this is not a barrier to sharing information where the failure to do so would result in a child being placed at risk of harm. 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.

Keeping Children Safe in Education makes it clear that 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: “No single professional can have a full picture of a child’s needs – **everyone** who comes into contact with them has a role to play in identifying concerns, sharing information and taking prompt action”. This includes allowing practitioners to share information without consent.

Safeguarding will keep all child protection records confidential, allowing disclosure only to those who need the information in order to safeguard and promote the welfare of children. A record will be made of who has viewed a child’s CP record, when and for what reason this will be recorded on the child’s chronology.

Safeguarding will cooperate with police and children’s social care to ensure that all relevant information is shared for the purposes of child protection investigations under section 47 of the Children Act 1989 in accordance with the requirements of Working Together to Safeguard Children (March 2018), the Prevent Duty Guidance for England and Wales (2015) and Channel Duty Guidance: Protecting vulnerable people from being drawn into terrorism (2015).

However, following a number of cases where senior leaders in education institutions had failed to act upon concerns raised by staff, Keeping Children Safe in Education emphasises that **any** member of staff can contact children’s social care if they are concerned about a young person.

## 7. Procedure for Managing a Disclosure

### STEP 1 – If a young person tells you about possible abuse you must:

- a) Listen carefully, stay calm and reassure the student that you are pleased they have come to talk to you about the situation.
- b) Communicate that s/he has a right to be safe and protected.
- c) Advise the student that you will help them but you will have to pass the information on to other people in order to do so. Explain who this will be - Safeguarding staff.
- d) Ask questions normally and without pressure in order to be sure that you understand what the young person is telling you. Do not ask leading questions and do not make any comments about the alleged offender.
- e) Record the date, time and place of your conversation with the student.
- f) Note carefully what the student has disclosed to you, the questions you may have asked the student and the key points of the response from the student.
- g) Reassure the young person that by telling you, they have done the right thing.

### STEP 2:

- h) Take the student to Safeguarding immediately, where possible. **You must not deal with this issue yourself!**

### STEP 3:

- i) As soon as you can, transfer your record of the whole conversation you have had with the student to Safeguarding via Confidential comments on Pro-monitor. It is essential to record all you have heard but please do not add any opinions or interpretations. If you not have access to Pro-Monitor, please contact Safeguarding in person.

### STEP 4:

- j) Safeguarding staff will look at the information they have been given by the member of staff reporting the issue. If the concerns about the student are significant and meet the additional needs/complex need criteria, they will be referred to the Multi-Agency Safeguarding Hub (MASH) so that a strategic overview can be maintained and any themes or common factors can be recognised. This includes concerns about a student who is affected by the behaviour of a parent or other adult in their household.

**Clear indications or disclosure of abuse will be reported without delay by Safeguarding staff.**

We recognise the stressful and traumatic nature of safeguarding and child protection work. We will support staff by providing an opportunity to talk through their anxieties with the Designated Safeguarding Lead and to seek further support as appropriate.

We will endeavour to discuss our concerns with parents and carers and seek their consent to refer concerns unless we feel that to do so would place a child at risk of, or cause further significant harm.

In all other circumstances, the parents must be informed at the earliest opportunity, except where the decision has been taken to involve the Police and/or Children's Social Care, in which case this should not happen before the Strategy Discussion/Meeting has taken place.

If a child does not want their family informed, then seek advice from a member of the Safeguarding team/Social Services/Police.

Clear guidelines and procedures for Safeguarding and Prevent are displayed across the College, in College publications, including the Learner Handbook (available electronically on the college Mobile App), and on the College VLE.

Telephone referrals to the relevant service for children/young people and adult social care for those over 18 years of age will be followed up in writing using the relevant form within 24 hours.

Written records of any concern regarding a young person's/ vulnerable adult's safety will be kept centrally in a file in a locked cabinet.

Sandwell College recognises that we do not have the responsibility to investigate cases of suspected abuse.

Sandwell College will co-operate with and share information with relevant external agencies in any enquiries regarding safeguarding and Prevent Duty matters, including representation at case conferences, core groups and multi-agency planning meetings as required. We will seek consent to share information from the parent or carer unless to do so would place a young person or vulnerable adult at risk of, or cause further significant harm or would compromise the Safeguarding process.

All staff will make it clear to any young person or vulnerable adult disclosing information that they cannot guarantee confidentiality, but they will only pass the information on to the people that can help them.

Information concerning young people and vulnerable adults at risk will be shared with all members of staff on a "need to know" basis. A Designated Member of Staff for Safeguarding will make a judgement in each individual case about who needs and has a right to access particular information.

Where there are concerns about a young person or vulnerable adult, a member of staff may be asked to keep a log of observations. This will be kept securely and transferred to the Vice Principal with responsibility for Safeguarding and adherence to the Prevent Duty.

All Safeguarding and Prevent Duty records are subject to the Data Protection Act (1998). If there is any doubt as to the rights of any party to access information, we may seek legal advice prior to releasing any information.

## 8. Allegations against staff and adults in a Position of Trust

All adults working with young people and vulnerable adults are considered to be in a position of trust, as a consequence of their knowledge, position and/or the authority invested in their role. This equally applies to volunteers.

This means that adults should **not**:

- Use their position to gain access to information for their own or other's advantage.
- Use their position to intimidate, bully, humiliate, threaten, coerce or undermine young people / vulnerable adults
- Use their status and standing to form or promote relationships which are of a sexual nature or may become so.

This means that adults should:

- Ensure that an unequal balance of power is not used for personal advantage or gratification
- Maintain appropriate professional boundaries and avoid behaviour which may be misinterpreted by others
- Report or record any incident where their behaviour may be misinterpreted with a Senior Manager at the earliest opportunity

All adults have a responsibility to maintain public confidence in their ability to safeguard the welfare and best interests of young people and vulnerable adults with whom they work or come into contact with. It is therefore expected that they will adopt high standards of personal conduct in order to maintain the confidence and respect of the general public and with their colleagues.

There may be times, for example, when an adult's behaviour or actions in their personal life come under scrutiny from local communities, the media or public authorities. This could be because their behaviour is considered to compromise their position in the workplace or indicate an unsuitability to work with young people or vulnerable adults. Misuse of drugs, alcohol or acts of violence would be examples of such behaviour. The behaviour of an adult's partner or other family members may raise similar concerns and require careful consideration by the College as to whether there may be a potential risk to young people and vulnerable adults within the workplace.

This means that adults should not:

- Behave in a manner which would lead any reasonable person to question their suitability to work with children or act as a role model, or
- Make or encourage others to make unprofessional comments which scapegoat, demean or humiliate

This means that adults should:

- Be aware that behaviour in their personal lives may impact upon their work with young people and vulnerable adults
- Follow codes of conduct and adopt positive behaviours as deemed appropriate by the College

- Understand that behaviours and actions of their partner (or other family members) may raise questions about their suitability to work with young people and vulnerable adults

All staff should be aware of their duty to raise concerns about the attitude or actions of colleagues.

**N.B. Guidelines set out within the College's Disciplinary Procedure and Procedure for Reporting and Dealing with Allegations of Abuse against Members of Staff and Adults in a Position of Trust, will be adhered to for internal and external investigation purposes.**

If a young person or vulnerable adult makes an allegation against a member of staff at the College the Designated Safeguarding Lead must be informed immediately, who will in turn inform the Human Resources Director.

If the Principal is implicated in the concerns you should discuss your concerns with the Local Authority Child Protection Officer who will initiate appropriate action in the same manner as allegations made against other staff in school and inform the Safeguarding Designated Lead at the end of their enquiries.

If you have safeguarding/Prevent or child protection concerns relating to the parents/carers of children and you are aware that they work with children, young people or vulnerable adults, you must inform the designated staff for child protection. This will allow for consideration to be given as to whether the position of trust process needs to be applied

If an allegation of abuse is made against a member of staff in work based provision not directly linked to college, it must be reported to the Police. The Designated Safeguarding Lead must be informed.

The member of staff should have no contact with the young person concerned and must not be informed of the allegation prior to referral.

Any individual (including volunteers, paid employees and those in work based placements) who come into contact with young people and vulnerable adults have a legal and moral duty to safeguard and promote their welfare. This duty requires individual staff to ensure the safety of a young person or vulnerable adult involved in any activity or interaction for which that person is responsible.

The Children Act 2004, through the Stay Safe outcome places a duty upon organisations to promote the well being of young people. This includes the need to ensure that all adults who work with or on behalf of young people in these organisations are competent, confident and safe to do so.

The majority of adults who work with young people and vulnerable adults act professionally: Adults who work with young people and vulnerable adults are responsible for their own actions and behaviours and should avoid any contact which would lead any reasonable person to question their motives and intentions.

It is recognised that working with young people and vulnerable adults can result in tensions between adults and the learner concerned such that misunderstandings can occur, and it is here that the behaviour of adults can give rise to allegations of abuse being made against them. The college has a robust staff professional boundaries

policy that provides guidance to ensure that staff are aware of their responsibilities when interacting with children, young people and vulnerable adults.

However, allegations may be genuine and research shows that there are adults who will deliberately seek out, create or exploit opportunities to abuse young people and vulnerable adults. It is therefore essential that all possible steps are taken to safeguard young people and vulnerable adults, and that adults working with them are safe to do so.

It is acknowledged that individuals may have concerns about the possibility of an allegation being made against them and for that reason it is important that they familiarise themselves with behaviours that may be considered as constituting gross misconduct and misconduct, and those which would be considered illegal.

Circumstances where misunderstanding may arise:

- Dress and appearance
- Personal living space
- Gifts, rewards and favouritism
- Communication with young people and vulnerable adults (including the use of technology)
- Social contact
- Sexual contact
- Young people and vulnerable adults in distress

Please note that the college has a dedicated **Safeguarding Professional Boundaries Policy**.

## 9. Physical Contact and Physical Intervention

Not all young people and vulnerable adults feel comfortable about physical contact. Adults should not make the assumption that it is acceptable practice to use touch as a means of communication. Wherever possible, young people and vulnerable adults should be advised before physical contact or intervention is made.

It is recognised that some young people / vulnerable adults who have experienced abuse may seek inappropriate physical contact and adults should be particularly aware of this when it is known that a learner has suffered abuse.

In this circumstance careful consideration should be given to the needs of the learner. Details of the learner and his / her additional needs must be reported to the Vice Principal with responsibility for Safeguarding.

### Physical Intervention

The College's policy on the use of physical intervention is detailed within the Health and Safety policy. It applies strictly to the application of physical intervention in the case of persons with an identified learning disability or severe challenging behaviour

and adheres to the Department of Health's Guidelines for the Use of Physical Intervention.

## 10. Learners Accessing Alternative Provision

Where learners are accessing the College as part of alternative school provision any Safeguarding/Prevent concerns must be reported to a member of the College's safeguarding team. This team will liaise closely with the Designated Officer from the young person's mainstream school, who will take the lead on the safeguarding case.

There are occasions when young people and vulnerable adults are placed in settings outside the College.

Young people and vulnerable adults are more vulnerable to abuse or harm in these situations than in short term placements, and therefore child protection arrangements are a relevant concern for longer term placements. Additional safeguards will be necessary for placements when one or more of the following conditions apply. The placement is:

- for more than one day per week;
- for longer than one term in any academic year;
- aimed at those who may be vulnerable, e.g. those who have special needs or are young (aged under 16);
- one where the workplace supervisor or a colleague will have substantial unsupervised access to the child, because of the nature of the business (i.e. micro business or sole trader); or
- One which has a residential component.

All Learning Providers working with young people therefore have a duty of care to ensure Safeguarding policies and procedures are in place and followed by their employees and volunteers. To do this we will ensure that we:

- Create and maintain an environment in which young people and vulnerable adults feel secure, are encouraged to talk and are listened to.
- Include curriculum and enrichment activities and opportunities to enable learners the opportunity to attain skills and attitudes, to help them resist abuse in their own lives and to prepare for the responsibilities in their adult lives, including parenthood.
- Communicate a clear model of management of suspected or disclosed abuse.

## 11. Responsibilities for Safeguarding learners on Placement

If any of the above conditions apply, the following safeguards should be in place at a strategic level:

- Sandwell College staff who arrange, vet, or monitor work placements will have had training in child protection;
- Training organisations or employers taking responsibility for a young person or a vulnerable adult on a long-term placement will be asked to make a

commitment to safeguarding their welfare by endorsing an agreed Safeguarding policy or statement of principles.

- Any person whose normal duties will include regularly caring for, training, looking after or supervising a child in the workplace should be vetted and subject to DBS Disclosures to ensure s/he is not disqualified from working with children or otherwise unsuitable to be responsible for them. This should not include people who will have contact with the child simply because s/he will be in the same location, or as part of their work. It is intended to apply to people who are specifically designated to have responsibility for looking after, supervising or directly training a child or children throughout the placement.
- DBS Disclosures will be arranged by the College, and the person will be regarded as a volunteer for the purpose of the Disclosure.
- That person will also be given basic Safeguarding and Prevent Duty training to be aware of their responsibilities. They should be given details of a person to contact in the event that there are any concerns about a learner for whom they are responsible.
- The learners who are placed in these settings will also be given clear advice about who to contact if they are worried or uncomfortable about their surroundings or if they suffer abuse. They will have a continuing point of regular contact within College and be given opportunities to raise any concerns they may have.
- If a concern is raised regarding a young person or vulnerable adult who is on a long term placement, then the normal College Safeguarding and Prevent Duty procedures will apply.
- In some cases, it is also important to ensure that the learner concerned is suitable for the placement (for example, when placing young people in environments involving them working with younger children). In these circumstances DBS Disclosures may be required.

## 12. Preventative Work

As part of developing a healthy, safer lifestyle, young people and vulnerable learners will be taught:

- to recognise and manage risks in different situations and then decide how to behave appropriately (including those within the digital world)
- to judge what kind of physical contact is acceptable and unacceptable
- to recognise when pressure from others (including people they know) threatens their personal safety and develop effective ways of resisting pressure, including knowing where and when to get help
- to use assertiveness techniques to resist unhelpful pressure

- Our learners should feel valued, respected and able to discuss any concerns they have. The College will seek to create an environment where this can be achieved.

## 13. Types of Abuse and Neglect

### Children who may require early help

Staff and volunteers working within the College should be alert to the potential need for early help for children. Staff and volunteers should consider following the procedures identified for initiating early help for a child or young person who:

- Is disabled and has specific additional needs;
- Has special educational needs;
- Is a young carer;
- Has high needs or additional learning needs;
- Is showing signs of engaging in anti-social, extremist or criminal behaviour;
- Is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health, domestic violence;
- Has returned home to their family from care; and/or
- Has complex home and/or personal lives;
- Is showing early signs of abuse and/or neglect.

### Contextual Safeguarding

Contextual safeguarding refers to the wider importance of considering wider environmental factors in a child's life that may threaten their safety and/or welfare. It is important for everybody who works with children to be aware that safeguarding incidents and/or behaviours can be associated with factors outside the school or college and/or can occur between children. All staff, but especially the Designated Safeguarding Lead (or Deputy) should be considering the context within which such incidents and/or behaviours occur. Contextual Safeguarding is referred to in Working Together to Safeguard Children and Keeping Children safe in Education.

### Child Protection and Safeguarding Issues

The statutory guidance 'Keeping children safe in education' (2019) provides guidance on a range of abuse or safeguarding issues including:

Abuse  
 Bullying (including Cyber)  
 Children & the courts  
 Children with family members in prison  
 Children missing from education or care  
 Child criminal exploitation - County lines  
 Child sexual exploitation  
 Domestic abuse/violence  
 Drug & substance misuse  
 Fabricated or induced illness

Faith based abuse  
FGM  
Forced Marriage  
Gender based violence towards women & girls  
Gangs and youth violence  
Homelessness  
Modern day slavery and human trafficking  
So called 'honour-based' violence  
Peer on peer abuse  
Preventing radicalisation (the Prevent duty)  
Private Fostering  
Relationship abuse  
Self-harm  
Sexting  
Sexual violence and sexual harassment  
Up Skirting

## **Abuse**

Abuse is a form of maltreatment of a child, this also relates to a vulnerable adult. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. They may be abused by an adult or adults, or another child or children. There are four types of child abuse as defined in 'Keeping Children Safe in Education' as follows:

**Physical abuse:** A form of abuse which 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:** The persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It 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. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond the child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyber bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, though it may occur alone.

**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 or not 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 none penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include 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. Sexual abuse can take place online and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. Sexual abuse of children by other children is a specific safeguarding issue in education.

**Neglect:** 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, for example, as a result 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 care-giver); or ensure access to appropriate care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

The above statements and criteria also relates to vulnerable adults.

### **Bullying (including Cyber)**

While bullying between children and young people is not a separate category of abuse and neglect, it is a very serious issue that can cause considerable anxiety and distress. At its most serious level, bullying can have a disastrous effect on a child's wellbeing and in very rare cases has been a feature in the suicide of some young people. Bullying someone because of their age, race, gender, sexual orientation disability and/or transgender will not be tolerated as the College operates a zero tolerance approach. Bullying can take many forms including: -

- Emotional:** Being excluded, tormented (e.g. hiding things, threatening gestures)
- Physical:** Pushing kicking, punching or any use of aggression and intimidation.
- Racial:** Racial taunts, use of racial symbols, graffiti, gestures.
- Sexual:** Unwanted physical contact, sexually abusive comments including homophobic comments and graffiti.
- Verbal:** Name calling, spreading rumour's, teasing.
- Cyber:** All areas on internet, such as email and internet, chat room misuse, mobile threats by text message and calls. Misuse of associated technology i.e. camera and video facilities, sexting.

Please refer to the College Harassment and Bullying of Learners Policy.

Please note that the college has a dedicated **Anti-Bullying and Harassment Policy.**

## **Children & the courts**

Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. There are two age appropriate guides to support children 5-11-year olds and 12-17 year olds via GovUK website. The guides explain each step of the process and support and special measures that are available. There are diagrams illustrating the courtroom structure and the use of video links is explained.

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

## **Children with family members in prison**

Approximately 200,000 children have a parent sent to prison each year. These children are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. NICCO provides information designed to support professionals working with offenders and their children, to help mitigate negative consequences for those children.

## **Child missing from Education or Care**

All staff should be aware that children going missing, particularly repeatedly can act as a vital warning sign of a range of safeguarding possibilities. This may include abuse and neglect, which may include sexual abuse or exploitation and child criminal exploitation. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of FGM or risk of forced marriage. Be aware that non-attendance from college could identify the existence of a safeguarding risk.

If there is any suspicion by staff or peers that the student may be at risk a member of the college Safeguarding team must be informed. Contact should be attempted with the student directly to attempt to establish that the missing student is safe and well and establish their location.

## **Children missing from Home**

Children may run away from a problem such as abuse or neglect at home or to somewhere they want to be. They may have been coerced to run away by someone else. Whatever the reason, it is thought that approximately 25 per cent of children and young people that go missing are at risk of serious harm. There are particular concerns about the links between children running away and the risks of sexual exploitation, FGM, forced marriage, radicalisation and travelling to conflict zones. Missing children may also be vulnerable to other forms of exploitation, to violent crime, gang exploitation or to drug and alcohol abuse. The college has a duty to notify the relevant local authority of learners withdrawn from college and suspected reasons why.

If a student has gone missing from home the parents do **not** need to wait 24 hours to inform the Police.

## **Child Criminal Exploitation – County Lines**

Criminal exploitation of children is a geographically widespread form of harm that is a typical feature of county lines criminal activity: drug networks or gangs groom and exploit children and young people to carry drugs and money from urban areas to suburban and rural areas, market and seaside towns. Key to identifying potential involvement in county lines are missing episodes, when the victim may have been trafficked for the purpose of transporting drugs.

The leaders of these gangs are likely to exploit children and vulnerable adults, often without them realising it, to move (and store) drugs and money. They use coercion, intimidation, violence (including sexual violence) and weapons.

There may be signs of a change in a young person's behaviour such as:

Returning home late, staying out all night or going missing  
Being found in areas away from home  
Increasing drug use, or being found to have large amounts of drugs on them  
Being secretive about who they are talking to and where they are going  
Unexplained absences from school, college, training or work  
Unexplained money, phone(s), clothes or jewellery  
Increasingly disruptive or aggressive behaviour  
Using sexual, drug-related or violent language you wouldn't expect them to know  
Coming home with injuries or looking particularly dishevelled  
Having hotel cards or keys to unknown places.

## **Child sexual exploitation (CSE)**

CSE is a form of sexual abuse that involves the manipulation and/or coercion of young people under the age of 18 into sexual activity in exchange for things such as money, gifts, accommodation, affection or status. The manipulation or 'grooming' process involves befriending children, gaining their trust and often feeding them drugs and alcohol, sometimes over a long period of time before the abuse begins. The abusive relationship between victim and perpetrator involves an imbalance of power which limits the victim's options. It is a form of abuse which is often misunderstood by victims and outsiders as consensual.

Sexual exploitation involves varying degrees of coercion, intimidation or enticement, including unwanted pressure from peers to have sex, sexual bullying including cyberbullying, grooming and sexting. However, it also important to recognise that some young people who are being sexually exploited do not exhibit any external signs of this abuse.

Key indicators of children being sexually exploited may include;

- Going missing for periods of time or regularly coming home late;
- Regularly missing college or education or not taking part in education;
- Displaying inappropriate sexualised behaviour
- Receiving unexplained gift or gifts from unknown sources
- Associating with other young people involved in exploitation;
- Having multiple phones

- Mood swings or changes in emotional wellbeing
- Seen at strange meeting places (hotels or known places of concern)
- Having older boyfriends / girlfriends
- Self-harming / drug or alcohol misuse
- Injuries (physical)

Staff should also be aware that many children and young people who are victims of sexual exploitation do not recognise themselves as such.

**There are three main types of child sexual exploitation:**

- *Inappropriate relationships* - Usually involves just one abuser who has inappropriate power – physical, emotional or financial – or control over a young person. The young person may believe they have a genuine friendship or loving relationship with their abuser.
- *Boyfriend* - Abuser grooms' victim by striking up a normal relationship with them, giving them gifts and meeting in cafés or shopping centres. A seemingly consensual sexual relationship develops but later turns abusive. Victims are required to attend parties and sleep with multiple men and threatened with violence if they try to seek help.
- *Organised exploitation and trafficking* - Victims are trafficked through criminal networks – often between towns and cities – and forced or coerced into sex with multiple men. They may also be used to recruit new victims. This serious organised activity can involve the buying and selling of young people.

**Domestic Abuse**

The Government defines domestic abuse as any incident or pattern of incidents of controlling, coercive or 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. This can encompass but is not limited to the following types of abuse:

- Psychological
- Physical
- Sexual
- Financial
- Emotional

**Controlling behaviour** is a range of acts designed to make a person subordinate and/or dependent by isolating them from sources of support, exploiting their resources and capacities for personal gain, depriving them of their means needed for independence, resistance and escape and regulating their everyday behaviour.

**Coercive behaviour** is an act or a pattern of acts of assault, threats, humiliation and intimidation or other abuse that is used to harm, punish or frighten their victim.

This definition includes so called 'honour based' violence, female genital mutilation and forced marriage, and is clear that victims are not confined to one gender or ethnic group.

Domestic Abuse does not necessarily involve physical violence and may include the following:

- The learner feels scared of angering their partner
- The learner is constantly being checked up on
- The learner is being isolated and may be kept away from friends or family
- The learner is being manipulated, which could involve the with- holding of affection as well as being lied to and shouted at
- Threats are being used for control
- Money or food are being with-held from the learner
- The learner is being repeatedly criticised, being told they are worthless, and humiliated in front of others?

The College will offer support through its internal welfare and counselling service and through its partnerships with local agencies, such as Black Country Women's Aid.

### **Drug and Substance Misuse**

Please note that the college has a dedicated **Drug and Substance Misuse Policy**.

### **Fabricated or Induced Illness**

Fabricated or induced illness is a rare form of child abuse. It occurs when a parent or carer, exaggerated or deliberately causes symptoms of illness in the child. In fabricated or induced illness, the parent may present the child as ill when they are healthy, deliberately induce symptoms of illness, manipulate test results, or exaggerate or lie about symptoms

Some of the indicators of fabricated or induced illness, include:

- the medical history doesn't make sense
- treatment is ineffective
- the symptoms disappear when the carer isn't around, and
- they can be seen repeatedly by different professionals looking for different things.

In all cases, the child's normal life is restricted. Cases of fabricated or induced illness are very complex. Where fabricated and induced illness is suspected, referrals should be made without alerting the child's carer.

### **Faith Based Abuse**

The term '*abuse linked to faith or belief*' includes belief in witchcraft, spirit possession, demons or the devil, the evil eye or djinns, dakini, kindoki, ritual or muti

killings and use of fear of the supernatural to make children comply with, for example, being trafficked for domestic slavery or sexual exploitation. Genuine beliefs can be held by children, families, carers and religious leaders that evil forces have entered the child and are controlling him or her. Abuse may occur when an attempt is made to 'exorcise' the child.

The beliefs are not confined to one faith, nationality or ethnic community.

- The indicators of abuse, which may also be common features in other kinds of abuse, include:
- a child's body showing signs or marks, such as bruises or burns, from physical abuse
- a child becoming noticeably confused, withdrawn, disorientated or isolated and appearing alone amongst other children;
- a child's personal care deteriorating, for example through a loss of weight, being hungry, turning up to school without food or lunch money, or being unkempt with dirty clothes and even faeces smeared on to them;
- it may be directly evident that the child's parent or carer does not show concern for or have a close bond with the child;
- a child's attendance at school becoming irregular or the child being taken out of school altogether without another school place having been organised, or a deterioration in a child's performance at school;
- a child reporting that they are or have been accused of being 'evil', and/or that they are having the 'devil beaten out of them'.

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

FGM refers to procedures that intentionally alter or cause injury to the female genital organs for non-medical reasons. **This practice is illegal in the UK.** FGM typically takes place between birth and around 15 years old; however, it is believed that the majority of cases happen between the ages of 5 and 8.

Risk factors for FGM include:

- Low level of integration into UK society
- Mother or a sister who has undergone FGM
- Visiting female elder from the country of origin
- Being taken on a long holiday to the country of origin
- Talk about a 'special' procedure to become a woman
- Sustained permanent serious injury

The Serious Crime Act 2015 sets out a **legal duty** on professionals as it is **mandatory** that they notify the police when they discover that Female Genital Mutilation (FGM) appears to have been carried out on a girl under 18.

### **Forced Marriage**

Forced Marriage is a marriage conducted without the consent of both parties and where duress is a factor. It is an entirely separate issue from an arranged marriage which is freely entered into and the two should not be confused.

Acts such as Forced Marriage and other so called 'honour crimes' come under the definition of Domestic Violence and a child who is subjected to this is at risk of significant harm through physical, sexual and emotional abuse.

Young people forced to marry, or those who fear they may be forced to marry, are frequently withdrawn from education, restricting their educational and personal development. They may feel unable to go against the wishes of their parents and consequently may suffer emotionally, often leading to depression and self-harm.

Learners who fear they may be forced to marry often come to the attention of, or turn to, an education professional before seeking help from the police or social services. Often the learner's friends report it to the education professional. Education professionals are in an ideal position to identify and respond to a victim's needs at an early stage.

**If the learner fears they may be forced to marry, they have limited choices:**

- To remain with the family and try to resolve the situation
- To accede to the family's wishes
- To flee the family
- To seek legal protection.

**Remember:**

- Remaining with the family and trying to resolve the situation can place the learner in danger.
- Acceding to the family's wishes means the learner is returning to an abusive situation.
- Learners fleeing a forced marriage that has not yet taken place may be reported as missing by their families. The forced marriage aspect of the case may not be apparent when the report is made.
- If the learner has dual nationality, they may have two passports, one British and one from the other country of their residence.

**What to do if a learner seeks help or if you have suspicions that a learner may be forced to marry**

**You must:**

- Ensure that non-attendance including authorised absence from college is reported immediately.
- ***If you have concerns for the safety of a learner under 18 years old*** liaise with a College Safeguarding Officer immediately for advice and report the incident. They will take the responsibility for following Local Safeguarding Children Board (LSCB) and College Safeguarding procedures
- If you cannot locate a Safeguarding Officer, then contact Children's Services for the area that the child resides and Police immediately for advice.
- ***If you have concerns for the safety of a learner over 18 years old*** explain all the options to the learner, recognise and respect their wishes. If the learner does not want any referral to be made, e.g. to the Police, staff will need to consider whether the learner's wishes should be respected or whether the learner's safety requires that further action be taken. If you do take action against the learner's wishes, you must inform them.

- **If the learner is a vulnerable adult**, referrals should be made in accordance with the local Multi-Agency Adult Protection Committee procedures and protocols to protect vulnerable adults from abuse. This will be done by a Safeguarding Officer. Staff must notify a College Safeguarding Officer of their concerns. If a Safeguarding Officer cannot be contacted you must contact the Police, Social Services or the Forced Marriage Unit, but you must also notify a Safeguarding Officer of this referral. Due to the nature of forced marriage and honour-based violence, you need to be aware that it's not always safe or the best place for someone to be with their family and the practice of attempting to resolve cases through family counselling, mediation, arbitration and reconciliation.
- See the learner immediately in a private confidential place, where the conversation cannot be overheard.
- See the learner on their own – even if they attend with others.
- Develop a safety plan in case the learner is seen i.e. prepare another reason why you are meeting.
- Establish if there is a family history of forced marriage, i.e. siblings forced to marry. Other indicators may include domestic violence, self-harm, family disputes, unreasonable restrictions (e.g. withdrawal from education, being confined to home) or missing persons within the family.
- Refer to a College Safeguarding Officer, who will contact the local police Child Protection Unit if there is any suspicion that a crime has been, or may be, committed. They will also liaise with the police if there are concerns about the safety of the learner or the learner's siblings.

#### **Do Not:**

- Treat such allegations merely as a domestic issue and send the learner back to the family home.
- Ignore what the learner has told you or dismiss out of hand the need for immediate protection.
- Approach the learner's family or those with influence within the community, to attempt mediation, as this will alert them to your concerns and may place the learner in danger.
- Contact the family in advance of any enquiries by the police, children's social care or the Forced Marriage Unit, either by telephone or letter.
- Share information outside College Information Sharing protocols without the express consent of the learner.
- Breach confidentiality except where necessary in order to ensure the learner's safety.

#### **What to do if a learner is going overseas imminently.**

- Try to gather as much of the following information as possible, as there may not be another opportunity if the learner is intending or is travelling overseas. This information may help the Forced Marriage Unit to locate the learner and assist to repatriate them.
- A photocopy of the learner's passport for retention. Encourage them to keep details of their passport number and the place and date of issue.
- As much information as possible about the family (this will need to be gathered discreetly) including:

- **Full name and date of birth of the learner under threat**
- **Their father's name**
- **Any other addresses of the learner or family based in the UK**
- **Any addresses where the learner may be staying overseas**
- **Potential spouse's name**
- **Date of the proposed wedding**
- **The name of the potential spouse's father (if known)**
- **Addresses of the extended family in the UK and overseas.**
- Information that only the learner would be aware of (this may assist any subsequent interview at an Embassy/British High Commission in case another person of the same sex/age is produced pretending to be the learner).
- Details of any travel plans and people likely to accompany the learner.
- Names and addresses of any close relatives remaining in the UK.
- A safe means by which contact may be made with the learner e.g. a secret mobile telephone that will function overseas. Record the number.
- An estimated return date. Ask that the learner contact you **without fail** on their return.
- A written statement by the learner explaining that they want the police/children's social care/third party to act on their behalf if they do not return/make contact by a certain date.

**Remember:**

- Give the learner the contact details of the nearest British High Commission/Embassy.

**Further Information**

- Advice can be sought from specialist caseworkers at the Forced Marriage Unit on 020 7008 0151 or website [www.fco.gov.uk/en/fco-in-action/nationals/forced-marriage-unit/](http://www.fco.gov.uk/en/fco-in-action/nationals/forced-marriage-unit/)

**Gender based violence towards women**

Violence Against Women and Girls (VAWG) is the term given to all forms of violence and abuse experienced disproportionately by women and girls, or experienced by them because of their gender, including rape, domestic violence, forced marriage, 'honour' based violence, FGM and sexual harassment.

**Gangs and Youth violence**

Children and young people who are exposed to gangs, gang-related activity and youth violence whether through their family, their peers, the area they live in, or the internet and social media are potentially at risk of significant harm. Providing the right support whilst a child is still in education may protect those vulnerable to exploitation by older gang members and those who are at risk of being drawn further into violent or negative behaviour over time.

Young people join gangs and groups for lots of reasons, including to feel part of something, to feel the excitement, to feel protected and looked out for.

Gang membership can be especially attractive to young people who are more vulnerable because they are not experiencing this sense of belonging or care at home.

Gangs can help people feel safe in numbers, but can also make people feel and be less safe when they are outside of their gang or their gang's territory. Inner city gang members are often restricted geographically by postcodes literally not being able to venture into other areas for fear of attacks by rival gangs

The most effective method to prevent children, young people and vulnerable adults becoming involved in gangs and criminal exploitation is early intervention and identification. This will enable preventative services to be implemented at an early stage to support those affected including relevant family members to make positive life choices and distance themselves from gang related activity.

Any child, young person or vulnerable adult is vulnerable to criminal exploitation and gang affiliation. This can be demonstrated by the number of "clean skins", where they are not known to services. These children, young people and adults do not have an existing criminal record or have not attracted the attention of law enforcement agencies or security forces. Gangs exploit many of these people at a time when they are most vulnerable due to recent bereavement, family separation / divorce, domestic discord or some other traumatic event in their life.

Gangs actively recruit "clean skins" since they are more likely to evade detection or draw attention to themselves from law enforcement agencies.

- To transport and sell drugs
- To launder money through personal bank accounts
- To be trafficked for sexual exploitation
- To store weapons and money

**Indicators of possible gang involvement may include:**

- Child withdrawn from family;
- Sudden loss of interest in college or change in behaviour. Decline in attendance or academic achievement (although it should be noted that some gang members will maintain a good attendance record to avoid coming to notice);
- Being emotionally 'switched off', but also containing frustration/rage;
- Starting to use new or unknown slang words;
- Holding unexplained money or possessions;
- Staying out unusually late without reason, or breaking parental rules consistently;
- Sudden change in appearance - dressing in a particular style or 'uniform' similar to that of other young people they hang around with, including a particular colour;
- Dropping out of positive activities;
- New nickname;
- Unexplained physical injuries, and/or refusal to seek/receive medical treatment for injuries;

- Graffiti style 'tags' on possessions, books, walls;
- Constantly talking about another young person who seems to have a lot of influence over them;
- Breaking off with old friends and hanging around with one group of people;
- Associating with known or suspected gang members, closeness to siblings or adults in the family who are gang members;
- Starting to adopt certain codes of group behaviour e.g. ways of talking and hand signs;
- Going missing;
- Being found by Police in towns or cities many miles from their home;
- Expressing aggressive or intimidating views towards other groups of young people, some of whom may have been friends in the past;
- Being scared when entering certain areas; and
- Concerned by the presence of unknown youths in their neighbourhood's.
- An important feature of gang involvement is that, the more heavily a child is involved with a gang, the less likely they are to talk about it.

### **Homelessness**

Being homeless or being at risk of being homeless presents a real risk to a child's welfare. Indicators that a family may be at risk of homelessness include: household debt, rent arrears, domestic abuse and antisocial behaviour as well as the family being asked to leave a property.

### **So-called 'Honour-Based' Violence**

So-called 'honour-based' violence (HBV) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing. Abuse committed in the context of preserving 'honour' often involves a wider network of family or community pressure and can include multiple perpetrators.

### **Modern Slavery and Human Trafficking**

Modern Slavery encompasses slavery, human trafficking, forced and compulsory labour and domestic servitude. Traffickers and slave masters use whatever means they have at their disposal to coerce, deceive and force individuals into a life of abuse, servitude and inhumane treatment.

A large number of active organised crime groups are involved in modern slavery. But it is also committed by individual opportunistic perpetrators.

There are many different characteristics that distinguish slavery from other human rights violations, however only one needs to be present for slavery to exist.

#### ***Someone is in slavery if they are:***

- Forced to work - through mental or physical threat;
- Owned or controlled by an 'employer', usually through mental or physical abuse or the threat of abuse;

- Dehumanised, treated as a commodity or bought and sold as 'property';
- Physically constrained or has restrictions placed on his/her freedom of movement.
- Not allowed to speak freely during conversations when another person is also present and dominates the conversation.

Contemporary slavery takes various forms and affects people of all ages, gender and races.

**Human trafficking** involves an act of recruiting, transporting, transferring, harbouring or receiving a person through a use of force, coercion or other means, for the purpose of exploiting them.

***Possible Indicators:***

Signs of various types of slavery and exploitation are often hidden, making it hard to recognise potential victims. Victims can be any age, gender or ethnicity or nationality. Whilst by no means exhaustive, this is a list of some common signs:

- Victim is not in possession of their legal documents (passport, identification and bank account details) and they are being held by someone else;
- The victim has old or serious untreated injuries and they are vague, reluctant or inconsistent in explaining how the injury occurred.
- The victim looks malnourished, unkempt, or appears withdrawn.
- They have few personal possessions and often wear the same clothes
- Clothes that they wear may not be suitable.
- The victim is withdrawn or appears frightened, unable to answer questions directed at them or speak for themselves and/or an accompanying third party speaks for them. If they do speak, they are inconsistent in the information they provide, including basic facts such as the address where they live.
- They appear under the control/influence of others, rarely interact or appear unfamiliar with their neighbourhood or where they work. Many victims will not be able to speak English.
- Fear of authorities.
- The victim perceives themselves to be in debt to someone else or in a situation of dependence.

**Peer on Peer Abuse**

All staff should recognise that children are capable of abusing their peers. The different forms of peer on peer abuse are:

- Bullying (including cyberbullying)
- Sexual violence (such as rape, assault by penetration and sexual assault)
- Sexual harassment such as sexual comments, remarks, jokes and online sexual harassment, which may be stand-alone or part of a broader pattern of abuse.
- Up skirting, 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.

- Physical abuse. Such as; hitting, kicking, shaking, biting, hair pulling or otherwise causing physical harm.
- Sexting (also known as youth produced sexual imagery).
- Initiation/hazing type violence and rituals.

## **Preventing Radicalisation – The Prevent Duty**

The Counter-Terrorism and Security Act, which received Royal Assent on 12 February 2015, placed a duty on specified authorities, including local authorities and childcare, education and other children’s services providers, in the exercise of their functions, to have due regard to the need to prevent people from being drawn into terrorism (“the Prevent duty”).

Prevent is one of four elements of CONTEST, the government’s counter-terrorism strategy. It aims to stop people becoming terrorists or supporting terrorism, and promotes safeguarding of young and/or vulnerable people.

The Prevent Duty and Strategy seeks to:

- Respond to the ideological challenge of terrorism and aspects of extremism, and the threat we face from those who promote these views
- Provide practical help to prevent people from being drawn into terrorism and ensure they are given appropriate advice and support
- Work with a wide range of sectors where there are risks of radicalisation which needs to be addressed, including education, criminal justice, faith, charities, the internet and health

The Counter Terrorism and Security Act (2015) placed a duty on further education colleges and the College has a responsibility to ensure that all staff and learners have knowledge in recognising risk and addressing Prevent appropriately. Strategies to meet this obligation include:

- To ensure that learners and staff are aware of their roles and responsibilities in preventing violent extremism
- Staff Induction and briefing sessions
- Enrichment sessions
- To create opportunities for open discussion and to listen and support the learner voice
- To break down segregation among different learner communities including by supporting inter-faith and inter-cultural dialogue and understanding, and to engage all learners in playing a full and active role in wider engagement in society.
- Promotion of British and our college values, namely democracy, rule of law, individual liberty, tolerance and respect for others.
- To ensure learner safety and that the College is free from bullying, risk, harassment and discrimination
- To provide support for learners who may be at risk and appropriate sources of targeted advice and guidance

## Staff and Learner Prevent Training

- **Student Induction** – All new learners receive a comprehensive induction including information on the Prevent Duty. The college commissions a Home Office approved provider to deliver theatre based presentations during the induction period.
- A member of the Safeguarding team is Home Office trained to deliver the **Workshop to Raise Awareness of Prevent (WRAP3) training to staff**. WRAP 3 training is a general awareness course that will enable staff to recognise signs, and to know what action to take in response to concerns. All staff will be offered this training in order to understand factors which make learners vulnerable to extremist ideas and know what action they should take.

## Indicators of Vulnerability to Radicalisation

Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism leading to terrorism. 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. Also included in the definition of extremism are calls for the death of members of the UK armed forces, whether in this country or overseas.

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.

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.

Individuals 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. It is vital that College staff are able to recognise those vulnerabilities.

## Indicators of vulnerability include:

The below points should not be triggers that instantly lead to believe that an individual is being led into extremism. They are factors which together can sometimes contribute towards an overall position of vulnerability.

**Identity Crisis** – an individual is distanced from their cultural / religious heritage and experiences discomfort about their place in society;

**Personal Crisis** – the individual may be experiencing family tensions; a sense of isolation/rejection; and low self-esteem or self-worth; 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 individual's country or region of origin may contribute to a sense of grievance that is triggered by personal experience of racism, discrimination or aspects of Government policy;

**Unmet Aspirations** – the individual 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/reintegration;

**Mental Health** – Conditions and disorders such as depression, anxiety, bi-polar and psychosis can make individuals interpret their surroundings or events in a distorted way.

**Special Educational Need** – individuals may experience difficulties with social interaction, empathy with others, understanding the consequences of their actions and awareness of the motivations of others. There could be a level of vulnerability due to exploitation by others due to a learning disability.

**Bereavement, loss, transition** – These can play a part in individuals looking for answers or seeking meaning in life. Sometimes a sudden, traumatic event can be the time a radicaliser turns up with a shoulder to cry on.

However, this list is not exhaustive, nor does it mean that anyone experiencing the above is at risk of radicalisation for the purposes of violent extremism.

Early indicators of radicalisation or extremism may include:

- Showing sympathy for extremist causes
- Glorifying violence, especially to other faiths or cultures
- Making remarks or comments about being at extremist events or rallies outside college
- Evidence of possessing illegal or extremist literature
- Advocating messages similar to illegal organisations or other extremist groups
- Out of character changes in dress, behaviour and peer relationships (but there are also very powerful narratives, programmes and networks that young people can come across online so involvement with particular groups may not be apparent.)
- Secretive behaviour
- Online searches or sharing extremist messages or social profiles
- Intolerance of difference, including faith, culture, gender, race or sexuality

- Graffiti, art work or writing that displays extremist themes
- Attempts to impose extremist views or practices on others
- Verbalising anti-Western or anti-British views
- Advocating violence towards others.

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; and
- Significant changes to appearance and/or behaviour;
- Experiencing a high level of social isolation resulting in issues of identity crisis and/or personal crisis.

## Referral

**Identification of Concern** - In the event of noticing changes about a learner that are in relation to vulnerabilities towards radicalisation and extremism, or having concerns for their welfare, staff need to contact the Prevent Lead, Paul Smith. The Safeguarding team will take action on a case-by-case basis according to the information given to them. The team will make any assessments or external referrals as required.

**Prevent Identification of Concern** - In the event of noticing changes about a learner that are in relation to vulnerabilities towards radicalisation and extremism, or having concerns for their welfare, staff need to contact the Safeguarding team. The Safeguarding Team will take action on an individual case-by-case basis according to the information given to them. The team will make any assessments or external referrals as required.

## Private Fostering

Private fostering is an arrangement made between the parent and the private foster carer, who then becomes responsible for caring for the child in such a way as to safeguard and promote his/her welfare.

A privately fostered child means a child under the age of 16 (18 if a disabled child) who is cared for and provided with accommodation by someone other than:

- a parent
- a person who is not a parent but has parental responsibility
- a close relative
- a Local Authority

for more than 28 days and where the care is intended to continue. It is a statutory duty for the college to inform the Local Authority where we are made aware of a child or young person who may be subject to private fostering arrangements.

### **Self-Harming**

Self-Harming is becoming much more prevalent in society and our staff must be trained to effectively and swiftly spot tell-tale signs. Because self-injury is often kept secret, it may be difficult to identify signs and symptoms.

Signs may include:

- Scars, such as from burns or cuts
- Fresh cuts, scratches or other wounds
- Bruises
- Broken bones
- Keeping sharp objects on hand
- Spending a great deal of time alone
- Wearing long sleeves or long pants even in hot weather
- Acting in a very conscious manner

Please note that the college has a dedicated **Self-Harm and Suicidal Behaviour Prevention Policy**.

### **Sexting (Youth Produced Sexual Imagery)**

It is important to be aware that young people involved in sharing sexual videos and pictures may be committing a criminal offence. There are several definitions of sexting but basically it is defined as 'images or videos generated by or of children under the age of 18 which are of a sexual nature or are indecent'.

Crimes involving indecent photographs (including pseudo images) of a person under 18 years of age fall under Section 1 of the Protection of Children Act 1978 and Section 160 Criminal Justice Act 1988. Under this legislation it is a crime to:

- Take an indecent photograph or allow an indecent photograph to be taken;
- Make an indecent photograph (includes downloading or opening an image that has been sent via email);
- Distribute or show such an image;
- Possess with or without the intention of distributing images;
- advertise

Although unlikely to be prosecuted as the outcome could be extremely detrimental to their future health and wellbeing children who send, possess and/or share indecent images need to be aware that they may be breaking the law and there are cases where children and young people have been convicted and sent to prison. They are however likely to be visited by police and risk media equipment being removed. If it is a case that involved an adult the process and potential outcome will be very different.

The Designated Safeguarding Lead (DSL) or Deputy should be informed of any such incidents to decide if this should be passed to the police. Devices thought to contain indecent images should be set to flight mode or switched off. If both sender and receiver are below 18 and there is no coercion; vulnerability; previous incidents or other circumstances that may add cause for concern the DSL may log the event and disciplinary action may be taken otherwise the situation will be escalated and local authority or police informed.

## **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.

Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and offline (both physically and verbally) and are never acceptable. It is important that **all** victims are taken seriously and offered appropriate support.

Reports of sexual violence and sexual harassment are extremely complex to manage. It is essential that victims are protected, offered appropriate support and every effort is made to ensure their education is not disrupted. It is also important that other children, adult students and college staff are supported and protected as appropriate.

Everyone should be aware of the importance of:

- making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up;
- not tolerating or dismissing sexual violence or sexual harassment as “banter”, “part of growing up”, “just having a laugh” or “boys being boys”;
- challenging behaviour (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia and flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them; and
- understanding that all of the above can be driven by wider societal factors beyond the college, such as everyday sexist stereotypes and everyday sexist language.

## **Sexual violence**

It is important that schools and colleges are aware of sexual violence and the fact children can, and sometimes do, abuse their peers in this way.

## **Sexual harassment**

For the purpose of this advice, when referring to sexual harassment we mean ‘unwanted conduct of a sexual nature’ that can occur online and offline. When we reference sexual harassment, we do so in the context of child on child sexual

harassment. Sexual harassment is likely to: violate a child's dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment.

Whilst not intended to be an exhaustive list, sexual harassment can include:

- sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names;
- sexual "jokes" or taunting;
- physical behaviour, such as: deliberately brushing against someone, interfering with someone's clothes (schools and colleges should be considering when any of this crosses a line into sexual violence - it is important to talk to and consider the experience of the victim) and displaying pictures, photos or drawings of a sexual nature; and
- non-consensual sharing of sexual images and videos.
- sexualised online bullying;
- unwanted sexual comments and messages, including, on social media; and
- sexual exploitation; coercion and threats.

### **Up Skirting**

Up Skirting is now a criminal offence under the Voyeurism (Offences) Act 2019 The CPS defines 'up skirting' as a colloquial term referring to the action of placing equipment such as a camera or mobile phone beneath a person's clothing to take a voyeuristic photograph without their permission. It is not only confined to victims wearing skirts or dresses and equally applies when men or women are wearing kilts, cassocks, shorts or trousers. It is often performed in crowded public places, for example on public transport or at music festivals, which can make it difficult to notice offenders.

## **14. Appendices**

- 1. Key Contacts**
- 2. Safeguarding Referral Flowchart**
- 3. Safeguarding reporting form**
- 4. Safeguarding Do and Don'ts**

## Key Contacts

### West Midland Child Protection contact details

Agency	Contact Details
Birmingham Children's Advice & Support Service (CASS)	0121 303 1888
Sandwell Children Trust	0121 569 3100
Dudley Safeguarding	0300 555 0050
Walsall Children's Services	0300 555 2866
Wolverhampton Children's Services	01902 555392

### Staff and Professional Concerns

Sandwell Local Authority Designated Officer (LADO): 0121 569 4770

### Emergency

Sandwell Adult Social Care  
(Concerns about adults) 0121 569 2266

Forced Marriage Unit 020 7008 0151

West Midlands Police 999  
or 101

### Other Organisations

Black Country Women's Aid 0121 553 0090

NSPCC Helpline 0808 800 5000

Child line 0800 1111

24 hour National Domestic Violence Freephone Helpline 0800 2000 247

Shelter – for housing advice 0808 800 4444

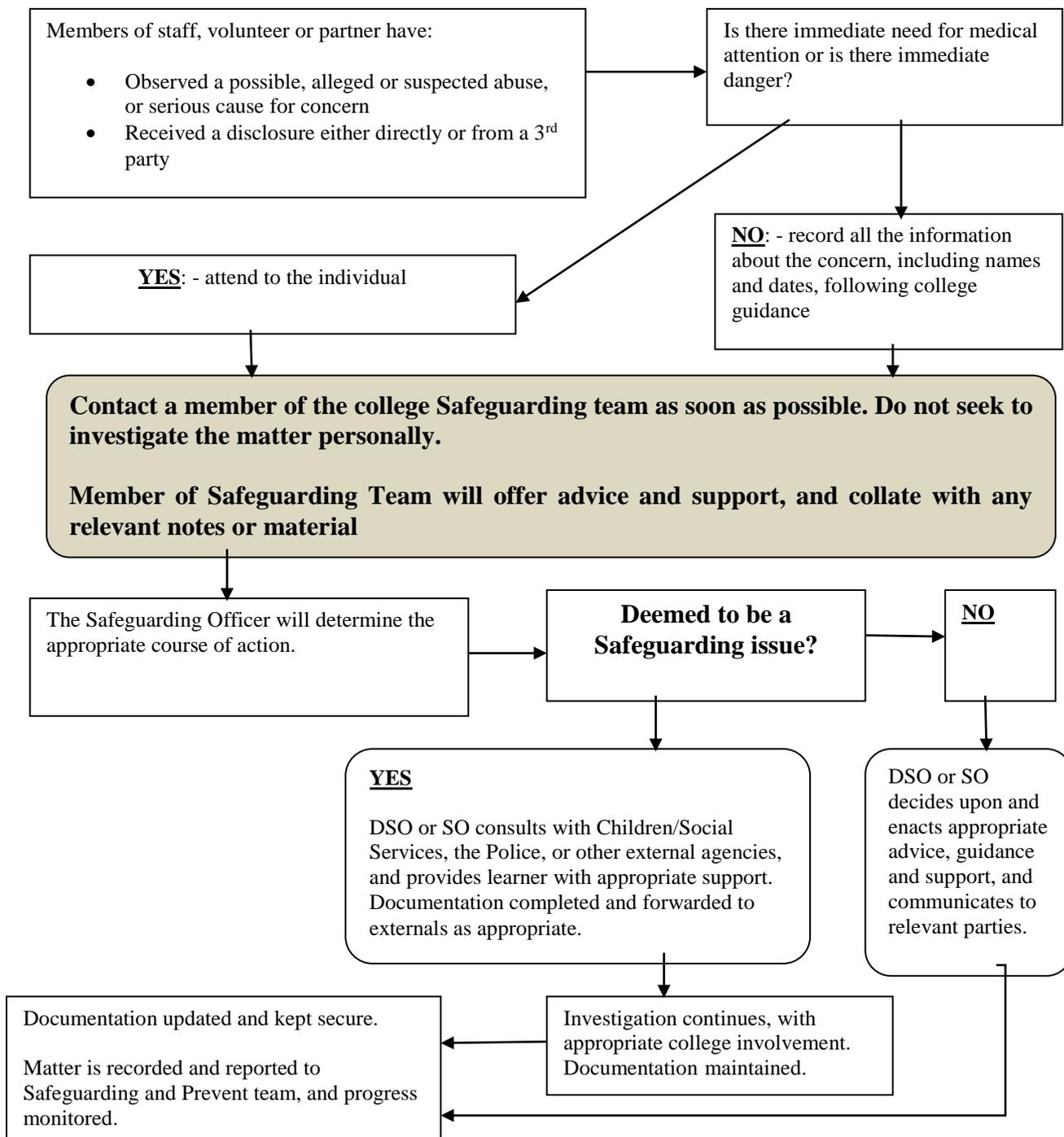
MIND – mental health charity 0300 23 3393

Victim Support	0808 1689 1111
National Stalking Charity	0808 802 0300
Survivors UK - Adult survivors of childhood abuse or male rape	0203 598 3898

**NB - All** Contacts checked and correct – September 2019. Please contact a member of the Safeguarding Team if found to be incorrect or changed.

## Safeguarding Referral Flowchart

**Sandwell College Safeguarding Flowchart procedure is for responding to and recording possible, alleged or suspected abuse, or serious causes for concern.**



## Safeguarding Incident/Concern Referral Form

**Safeguarding and Prevent  
Incident/ Concern Report Form**  
‘Private & Confidential’  
TO BE COMPLETED WITH A MEMBER OF THE  
SAFEGUARDING BOARD



<b>Student Name</b>		<b>Person Code</b>	
<b>Course</b>		<b>D of B</b> / /	<b>Age</b>
<b>Member of staff disclosed to</b>		<b>Date and time of disclosure</b>	

Incident/Concern Details : SAFEGUARDING  PREVENT

**Information as reported by the Learner : Describe as fully as possible and continue on another sheet if necessary. Include all relevant details such as Names; Locations; dates and times.**

**Supporting information as reported by others :  
( Include names, contact numbers and roles)**

**Other relevant staff involved  
(including external agencies such as social services, police etc)**

Name	Agency	Tel No	E Mail Address

**Decisions Made/ Actions Taken (include names and dates)**

Form completed by: \_\_\_\_\_

Signature: \_\_\_\_\_ Date: \_\_\_\_\_

## Safeguarding Do and Don'ts

- Do find out who the college designated safeguarding officer is and who the safeguarding team are.
- Do ensure that the person is not in any risk of immediate danger, if they are seek Police or medical assistance (999).
- Do find a quiet, confidential, secure area for you and the learner.
- Don't place yourself or anyone else in danger.
- Never promise confidentiality – you will have to break it and with it the person's trust in you.
- Do remember, that the child, young person or adult may not want their family informed. In this instance seek advice from a member of the Safeguarding team in the first instance or if not quickly available then seek advice from the Social Services/Police.
- Do not interfere with, or contaminate potential evidence following a physical or sexual assault, for example, by get the learner to wash, change clothing etc.
- Do listen and stay calm, you need to listen without making any assumptions or judgements.
- Do not interview the child, young person or adult at risk of harm. Question normally, quietly and without any pressure and only seek clarity and to be sure that you understand what you have heard. Never ask leading questions or act as an investigator. Do not lead or put words in the person's mouth.
- Do reassure that by telling you, they have done completely the right thing.
- Do inform them that you must pass the information on, but that only those that need to know about it will be told. Inform them of whom you will report the matter to.
- Do record information on the relevant safeguarding records immediately and make the appropriate referral with confidentiality.
- Do not investigate concerns or allegations yourself, but report them immediately to a member of the safeguarding team.
- Don't, in any circumstances, discuss the issue with the alleged perpetrator(s).
- Don't do nothing - tell Safeguarding or the relevant authorities immediately.