

## Safeguarding Policy

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This policy applies to :	All staff and students.	
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Author:	Emma Hart	
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Equality Impact Assessment	In place.	
Linked to College Value:	Well-being and safety of all. Link to Family value: 'positive aspirations of a free and happy future'.	

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Identifying different forms of abuse/safeguarding issue:

Prevent

Physical, emotional, sexual and neglect

CSE

FGM

Forced marriage

Honour based violence

# Peer on peer abuse and sexual harassment

## 1 Introduction

### 1.1 Policy Statement

Oldham Sixth Form College is committed to safeguarding and promoting the welfare of all of its students and to sustaining an open and supportive culture where:

- Students can thrive and achieve
- Staff, governors, volunteers and visitors can feel secure
- Everyone is assured that their welfare is a high priority

This policy applies to staff, students, governors and visitors to the College.

Consultation has involved colleagues in the Oldham Local Safeguarding Children Board (LSCB) to ensure compliance with government expectations. The policy covers the roles and responsibilities described in the **Working Together to Safeguard Children guidance (HM Government, 2013) and the 2018 updated document, as well as Keeping Children Safe in Education (updated 2018).**

This document has been written to inform staff, students and visitors about the College's commitment to safeguarding and the gravity with which it attends to allegations of abuse and other safeguarding risks.

Appendix 1 Statutory guidance document

safety policy.

**It should be read alongside other policies, including:  
For students – Anti-bullying policy, Forced marriage policy, E-**

**For staff and contractors/visitors – Whistle blowing policy, Lettings/Visitors policy.  
As well as the Prevent action plan and risk assessment.**

**Designated officer for Safeguarding:**

<b>Name</b>	<b>Office</b>	<b>Extension</b>	<b>email</b>
Emma Hart	87	2226	eha@osfc.ac.uk

Should Emma Hart not be available, Alexa George is the welfare support officer and Ruth Vickers/Jenny King share the role of additional support officer; all are designated seconds to Emma Hart.

In the absence of the team, another member of the senior management team should be contacted; Peter Roberts, Deputy Principal, in the first instance.

Direct referrals in person should be made and Cedar can be used to log or refer safeguarding concerns. **Email should not be used to inform on safeguarding concerns.** Reception can also locate the safeguarding team. Zahida Sarwar is the team administrative officer.

Designated Governor for Safeguarding: Jane Bevan

**Record of training for staff (over a three year period):**

All staff face to face training on safeguarding procedures and Prevent:

– September 2015, March 2015 and June 2016 and annual new staff training.

Separate training session for contracted staff – cleaners and canteen staff College security – June 2016 and October 2018.

Online safeguarding training modules, including e-safety, CSE, FGM and FM completed by all staff and governors - June 2016 and within 4 weeks for all new staff.

All staff face to face training on CSE, FGM and FM – March 2017.

Online Prevent training for all staff and governors – September 2018.

**1.2 Definitions:**

**\*Safeguarding and promoting the welfare of children:**

Protecting children from maltreatment;

Preventing impairment of children’s health or development;

Ensuring that children are growing up in circumstances consistent with the provision of safe and effective care; and undertaking that role so as to enable those children to have optimum life chances and to enter adulthood successfully.

**\*Child protection:** A part of safeguarding and promoting welfare. This refers to the activity that is undertaken to protect specific children, who are suffering, or are likely to suffer, significant harm.

**Children and young people:** Those who have not reached their 18th birthday.

**Duty of Care:** The duty which rests upon the College and every employee, volunteer and contractor to ensure that all reasonable steps are taken to ensure the safety of a child, young person or vulnerable adult in our care. Any person in charge of, or working with children, young people or vulnerable adults, in any capacity is considered, both legally and morally, to owe them a duty of care.

**Vulnerable Adult:** A person who may be in need of community care services by reason of mental or other disability, age or illness, and who is or may be unable to take care of him or herself, or unable to protect him or herself against harm or exploitation.

**\*Working Together to Safeguard Children March 2013/18**

### **1.3 Context – all previous legislation is taken into account in this policy and in all procedures.**

#### **Education Act 2002**

Section 175 places on the College the duty to carry out our function with a view to safeguarding and promoting the welfare of children and young people.

#### **The Children Act 2004**

Section 10 places a duty on the College to cooperate with relevant agencies to improve the wellbeing of children in line with the arrangements put in place by the Local Authority.

Section 11 places on the College the duty to ensure that our functions are discharged with regard to the need to safeguard and promote the welfare of children.

Section 12A was inserted by section 194 of the Apprenticeships, Skills Children and Learning Act 2009 and requires the cooperation arrangements made under section 10 to include the establishment of a Children's Trust Board.

#### **Safeguarding Vulnerable Groups Act 2006**

This provides the legislative framework for the introduction of the new vetting and barring scheme for those working with children and vulnerable adults. The scheme is the Government's response to recommendation 19 of the Bichard enquiry 2004. The primary aim of the scheme is to bar individuals from working in situations where evidence suggests that they present a risk of harm, to children or vulnerable adults.

#### **Protection of Freedoms Act 2012**

Improves the Disclosure and Barring Service (DBS) by scaling procedures back to 'common sense levels', while ensuring a continued service to help safeguard children and vulnerable adults by those who work or volunteer with them. They operate in a way which reduces the burden on employers and better respects the civil liberties of the individual. As a result of the implementation of the Act the DBS has defined:

**Child Work Force** as any position that involves working/volunteering with children

**Adult Work Force** as any position that involves working/volunteering with adults

For the purpose of clarity, all employees and volunteers engaged in activity at OSFC will be defined as being part of the Child Work Force.

Only those engaged in undertaking personal care for adults would be designated as part of the Adult Workforce and this does not apply to activity undertaken by any staff or volunteers associated with the College at this point in time.

The most recent statutory guidance under this Act '**Keeping children safe in education: Statutory guidance for schools and colleges' 2018** is provided in appendix 1 at the end of this document.

This policy has been updated in accordance with the newest version of the **Working Together to Safeguard Children guidance 2018**, which is also included within appendix 1.

### **What is abuse and neglect?**

Abuse and neglect are forms of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to prevent harm. Children may be abused in a family or in an institutional or community setting, by those known to them or, more rarely, by a stranger. They may be abused by an adult or adults, or another child or children. It can involve one or more of the following:

- Physical abuse
- Emotional abuse
- Sexual abuse
- Neglect
- Peer on peer abuse
- Sexual harassment
- CSE
- FGM
- Forced marriage

## **2 Guidelines on the Safeguarding of Young Adults**

### **2.1 College Commitment**

Safeguarding is the responsibility of **all** adults working with children, young people and vulnerable adults.

The care and wellbeing of all young people in College is of paramount importance. The College also takes seriously its legal responsibility with regard to issues of child abuse.

#### **The College will:**

- Establish and maintain an environment where students feel secure and are listened to.
- Bring to the attention of College staff that there are **recognised formal procedures** to be followed when they become aware of an issue or concern relating to Child Protection.
- Provide **clear operational guidelines** for College staff, which state what action should be taken where there is concern.
- Ensure that Safeguarding concerns and referrals are **handled sensitively, professionally** and in a way which supports the needs of young people.
- Recognise that it cannot and should not work in isolation from other agencies.
- Recognise that it does not have an investigatory role in child protection, the role therefore is to ensure that concerns are passed on, without delay, to agencies who have a statutory responsibility to investigate, i.e. social services and the police.
- Recognise that wherever students are placed outside the College environment e.g. work placements, the overall responsibility for the student remains with the College.
- Ensure we practice safe recruitment in checking the suitability of staff and volunteers to work with students.

- Raise awareness of child protection issues and equip students with the skills needed to keep them safe.
- Establish a safe environment in which students can learn and develop, including the Virtual Learning Environment (VLE).
- Establish procedures for reporting and dealing with allegations of abuse against members of staff, including appropriate whistle blowing procedures.
- Ensure there is a nominated governor responsible for safeguarding.
- Ensure every member of staff, volunteer and governor knows the name of the designated member of staff responsible for safeguarding and their role.
- Ensure all staff understand their responsibilities in being alert to the signs of abuse and responsibility for referring any concerns to the designated member of staff responsible for safeguarding.
- Ensure all staff are offered an appropriate level of training in respect of their role, responsibilities and the nature of the direct contact they have with students.
- Ensure that parents have an understanding of the responsibility placed on the College and staff for safeguarding by setting out its obligations in the College prospectus.
- Keep parents informed on College safeguarding work and procedures and provide them with information to educate their children on safeguarding matters, including e-safety.
- Ensure students understand their responsibilities with regard to safeguarding
- Develop effective links with relevant agencies.
- Keep written records of concerns about students, even where there is no need to refer the matter immediately.
- Ensure all records are kept securely, in a sealed envelope in the student file and in locked locations or in password protected and restricted access computer systems.
- Ensure procedures are in place to manage allegations made against members of staff.
- Ensure safe recruitment practices are always followed.
- Ensure procedures are in place to manage the follow-up of incidents where members of staff have been involved in physically restraining a student or vulnerable adult or have themselves been physically attacked.
- Ensure that whenever students are required to travel by taxi or private hire, only firms that have guaranteed all their staff are DBS checked should be used.
- Ensure that, where a student on the child protection register leaves, their information is transferred to the new college or school or 'Positive Steps Oldham' immediately, following the new Keeping Children Safe in Education 2018 guidelines.

The College believes that its students have a right to make important decisions about their own lives. Therefore, there are occasions where an instant response may not be in the best interests of the young people concerned, so it is important to apply the guidelines with sensitivity to the individual circumstances of the student and their family.

In the event that the allegations of abuse relate to or involve an employee of this corporation, such cases will be subject to the normal disciplinary procedures published by the College, which will make specific provision for dealing with them.

Any policy can only act as a set of guidelines, since the nature of these issues will invariably require a 'judgement call' and staff can only be expected to act to their best understanding of the situation.

## **2.2 Responsibilities**

### **2.2.1 The Governing Body should ensure that:**

- The College has an appropriate Safeguarding/Child Protection Policy and procedures.
- The College operates safe recruitment and vetting procedures.
- The College has procedures for dealing with allegations of abuse against members of staff and volunteers.
- There is a Designated Senior Leader to lead responsibility for dealing with child protection issues.
- The Designated Senior Leader undertakes Local Safeguarding Children's Board inter-agency training, which should be up dated every two years.
- All other staff, who work with children, undertake training to equip them to carry out their responsibilities for child protection effectively and that they attend refresher training every three years.
- All temporary staff and volunteers, who work with children, are made aware of the College's arrangements for child protection and their responsibilities through the internal policy document.
- It remedies, without delay, any deficiencies or weaknesses in regard to child protection that are brought to its attention.
- It undertakes an annual review of its policies relating to safeguarding and how the above duties have been discharged.

In addition, the College will appoint a Governor, who will have specific regard to Safeguarding matters including:

- Undertaking additional training.
- Being briefed on specific areas of concern.
- Giving due consideration to Safeguarding, when the appointment of new Governors is being considered.
- Raising concerns and suggestions for improvement with the Senior Leader with responsibility for Safeguarding.

The nominated Governor with specific responsibilities in relation to Safeguarding/Child Protection for 2018 is Jane Bevan.

### **2.2.2 Senior Leaders will ensure that:**

- The policies and procedures adopted by the Governing Body are fully implemented and followed by all staff.
- Sufficient resources and time are allocated to enable the Designated Person and other staff to discharge their responsibilities.
- All staff and volunteers feel able to raise concerns about poor or unsafe practice in regard to children, and such concerns are addressed sensitively and effectively in a timely manner, in accordance with the agreed whistle blowing policy.

### **2.2.3 Senior Staff with Designated Responsibility for Child Protection will:**

- Refer cases of suspected abuse or allegations to the relevant investigating agencies. Keep appropriate records.
- Act as a source of support, advice and expertise within the College.
- Undertake appropriate training to ensure they are able to undertake their role effectively. This will be in line with the OLSCB's child protection training strategy and will include the operation of locally agreed child protection procedures. Designated Persons will need to refresh their child protection training every two years, in line with government guidance: "Keeping Children Safe in Education" (DfE 2018 update).

- Ensure all staff and volunteers have access to and understand the College's Safeguarding Policy.
- Ensure that all staff, in liaison with the HR Manager, have appropriate training in line with their roles and responsibilities.
- Ensure that all new staff have a copy of the Safeguarding Policy, during their induction.
- Provide reports to the Governing Body and review the policy on an annual basis.
- Ensure all students are aware of the Safeguarding Policy and of their responsibilities with regards to Safeguarding.

#### **2.2.4 Each member of staff and every volunteer:**

- Has a legal responsibility to safeguard all students.
- Must fully comply with the College's policies, procedures, systems and guidance.
- Must attend training appropriate to their roles and responsibilities.
- Must be vigilant and report any concerns as appropriate.
- Must help to create a listening culture and help to ensure that students know that they can come to them to be listened to.
- Should promote safeguarding awareness amongst all students.
- Should report any change in their personal circumstances (for example the committing of an offence) that may call into question their suitability to work with children.

#### **2.2.5 College students**

Each member of the student body has a responsibility to support the College staff, volunteers and the governing body in its work on safeguarding. This responsibility to the College shall be considered to have been discharged/satisfied if the student has provided, to the best of their knowledge, accurate and honest information to the staff, volunteers or governing body, which may alert them to the potential for OR prevent actual harm being committed to **any** member of the College

It is also a specific requirement of the entire student body to recognise that as individuals and collectively they have a duty not to perform reckless acts, which may cause any harm to others.

### **3 Procedures for Cases of Suspected Abuse and Situations of Serious Risk**

#### **3.1 Confidentiality**

Safeguarding raises difficult issues of confidentiality. College staff cannot offer absolute confidentiality to students. There are clear situations when it is essential that staff share information with their colleagues. In the case of abuse, it is essential that staff share information with the Designated Person(s) or a member of SLT.

**If a member of staff thinks that a student might be about to disclose abuse, they must gently point out to the student that they are willing to listen, but that they will have to inform someone else.**

Members of staff must refer if:

- there is information or evidence that a student under the age of 18 is being abused and/or they suspect that abuse has taken place.
- they are unsure if abuse has taken place.
- in their judgement there is, or could be, a risk of harm to the student or to others.
- they suspect that a crime has been, or is about to be, committed.

- it is simply outside the scope of their experience to deal with the situation.

### **Students aged 16-18 Years**

It must be stressed that this age range is covered in law by the Children Act 1989 and so any suspicion or allegation of abuse should be taken seriously and dealt with sensitively. Staff who have concerns about apparent injuries or who have been given information by a student which raises their concern, **must** report their concerns to the designated person, even if the student's stated wishes are to the contrary. Therefore, staff must ensure that they do not guarantee absolute confidentiality, as these concerns may lead to a subsequent referral to the appropriate agencies.

As a general guideline, the following points should be considered:

1. Is life at risk?
2. Is a criminal act being committed?
3. Are any younger children involved?
4. What does the young adult want to happen?

The College would encourage, but not force, all young adults under the age of 18 years to make a consensual report of abuse. Under no circumstances should staff take any steps which would be considered as forcing the person to make a disclosure. However, by disclosing information, the young person has already indicated that they need support in dealing with the matter. College's role will be to support them should they need us to do so.

### **Students under the Age of 16**

Members of staff will need to be particularly careful in dealing with these minors.

Similarly, staff who have concerns about apparent injuries or who have been given information by a child, which raises their concern, **must** report their concerns to the designated person, even if the child's stated wishes are to the contrary. Therefore, as stated, staff must ensure that they do not guarantee absolute confidentiality, as these concerns may lead to a subsequent referral to the appropriate agencies.

### **Students over the Age of 18**

If the young person is over 18, we are not subject to the same statutory responsibilities. They are considered as adults, but it is nevertheless extremely important to listen to them carefully and with respect. Students with special needs and/or learning disabilities are, however, covered by the act until the age of 21. This is especially important if they reveal past abuse or the fact that there are other children under 18, in the home, who are at risk. In this case, the above guidelines must also be followed.

In situations which do not fit neatly into the above categories and when staff find themselves uneasy and confused about what action, if any, to take, they should discuss the situation with the Designated person(s) or a member of SLT, who will advise and help them to decide on a course of action.

In all cases, there must be an opportunity for the young person's wishes to be heard and taken into account in decision making. The child's best interests should be at the heart of everything.

## **3.2 Listening**

Students need to know that they will be listened to and that their concerns will be taken seriously. Young people will talk about their concerns and problems to people they feel they can trust. The

person a student talks to will not necessarily be a senior member of staff. If you are approached by a student wanting to talk, you should listen positively and follow the advice given below. Listening skills training was delivered to Personal and progress tutors and other members of staff in 2016 and 2017.

- Rather than directly questioning the student, simply listen and be supportive.
- Never stop a student who is freely recalling significant events, but don't push the student to tell you more than they wish.
- Do not prompt the student in any way or ask ANY questions as this may prejudice the outcome should any allegations go before a court.
- If the student wishes to make a formal allegation against someone, ask him/her to write down the precise details of the allegation and to **sign** the document.
- Reassure the student that confidences will be shared only with those who **have** to know and that all guidance, advice and support possible will be given. This might include referring the student to a specialist agency (agencies) outside of the College, where appropriate.

### **3.3 Recording**

- Write an account of the conversation, as close to verbatim as possible of what may have happened, when, and to whom (remember siblings under 18 may be involved and at risk too).
- Put the time when the student spoke to you and the date and time you wrote your transcript.
- The names of any people who are present during the disclosure.
- A brief description of any injuries, which are visible or alleged.
- The young person's preferred action.

**Then pass on your record to the Designated Person(s) responsible for safeguarding.**

### **3.4 Students with Special Educational Needs and Looked after Children**

Indications of abuse should be reported in exactly the same way as for other students, according to the procedures outlined. Where abuse is established, students who have difficulty communicating should be given the chance to express themselves to a member of staff or representative from an external agency, with appropriate communication skills and at all stages, advice should be sought.

**We recognise** that, while all children have a right to be safe, some children may be more vulnerable to abuse, for example those with a special educational need or disability. For these students, additional barriers can exist when recognising abuse and neglect. For example:

assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the young person's disability without further exploration;

children with SEN and disabilities can be disproportionately impacted by things like bullying - without outwardly showing any signs; and  
communication barriers.

New arrivals to the country, whose first language is not English, or those living with domestic violence or drug / alcohol abusing parents would also need careful monitoring.

### **Looked After Children**

If a child is subject to a child protection plan or, where there is an existing child protection file, the College will take this into consideration before making the decision to exclude, either permanently or fixed term.

For Looked After Children, the College should ensure that all staff have the necessary information to ensure that a looked after child can be kept safe. This may involve information with regards to a child's looked after status being shared with staff. The DSL should have details of the child's social worker and external agencies working with that child and ensure attendance at meetings of professionals and that an appropriate follow up takes place. Any suspected cases of abuse would be immediately reported to the attached social worker and follow the usual procedures. For care leavers, information should also be passed on to the local authority advisor attached to that child.

### **3.5 Procedures to follow in all cases of suspected abuse and situations of serious concern**

- Any allegations of abuse, or suspicions of abuse, need to be taken seriously, and handled in a sensitive manner with the student.
- Individual members of staff should never deal with child abuse disclosures in isolation, and should always refer to the Designated Person promptly.
- No College member of staff should carry out investigations or decide whether a student has been abused.
- Information should be strictly limited to those who need to know.

If you do hear any allegations, the most important thing is to listen carefully to what the student says, using the following guidelines:

#### **3.5.1 Suspicion/Rumour: Action (See Flowchart)**

- You notice signs or symptoms of possible abuse: Immediately, make a written note of your observations. Consult the College's Designated Person.
- You decide with the Designated Person whether or not to approach the student concerned: Where appropriate, outside agencies will be consulted.  
The Designated Person will suggest strategies which will support both you and the student.
- The College's Designated Person will record the incident and the decision on Cedar and continue to monitor the situation.
- If the student needs support, the Designated Person will refer him/her to the College Counsellor or other appropriate agencies.

#### **3.5.2 Disclosure of Abuse: Action (See Flowchart)**

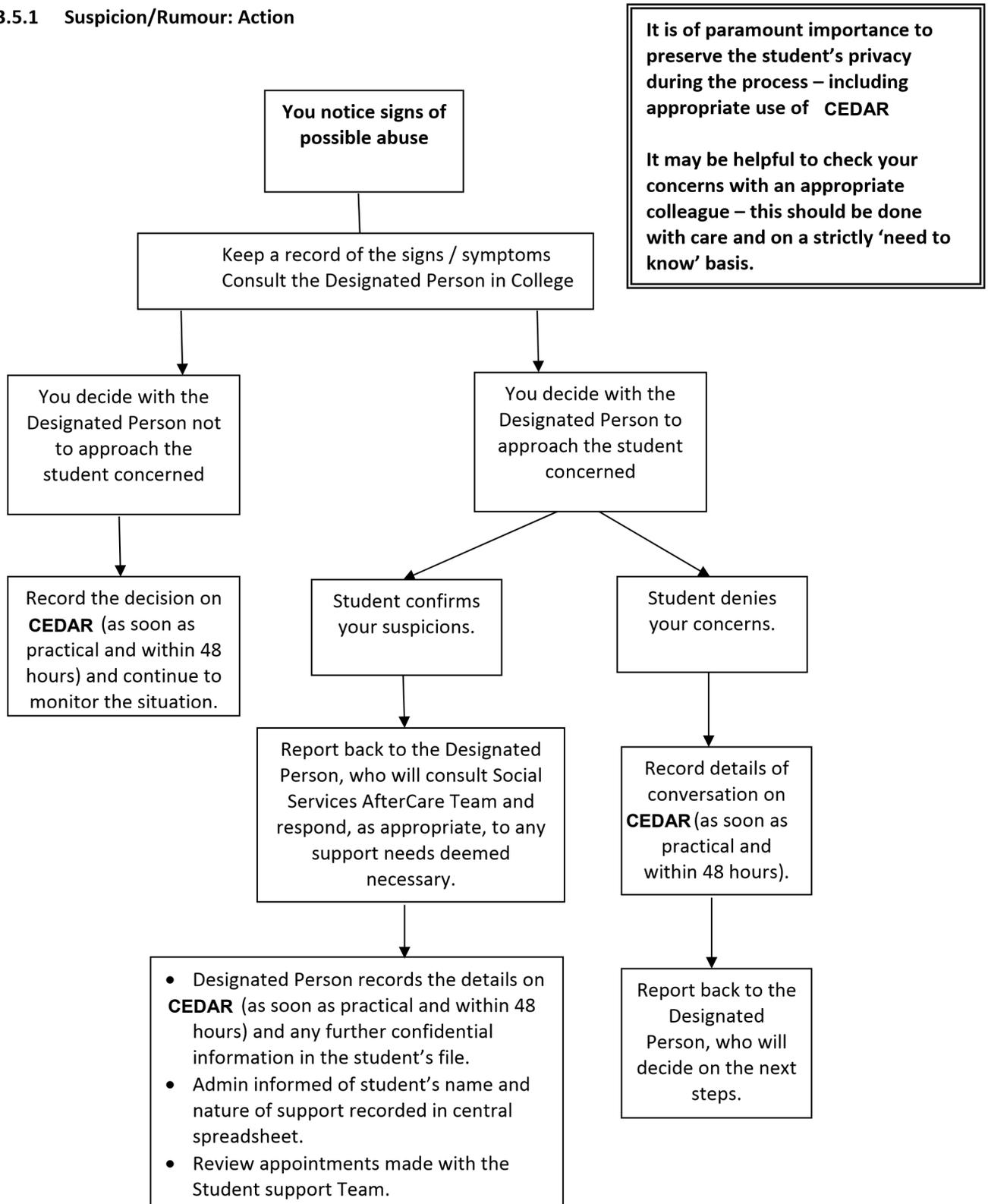
- It is of paramount importance to preserve the student's privacy. Speak only to the College's Designated Person(s).
- At the outset, tell the student that you may need to talk to someone else about this i.e. the Designated person(s).
- Listen to the student.
- Record details of the concern.
- Encourage the student to speak to the College Counsellor for support.
- Contact the College's Designated Person.
- The College's Designated Person will consult the MASH Team, Social Services and/or Police, if appropriate.

If early help is appropriate, the DSL should support the staff member in liaising with other agencies and setting up an inter-agency assessment as appropriate. Early help referrals will be made by the DSL and deputies only, supported by other relevant staff such as teachers, Learning Support Assistants, Personal/Progress Tutors as appropriate.

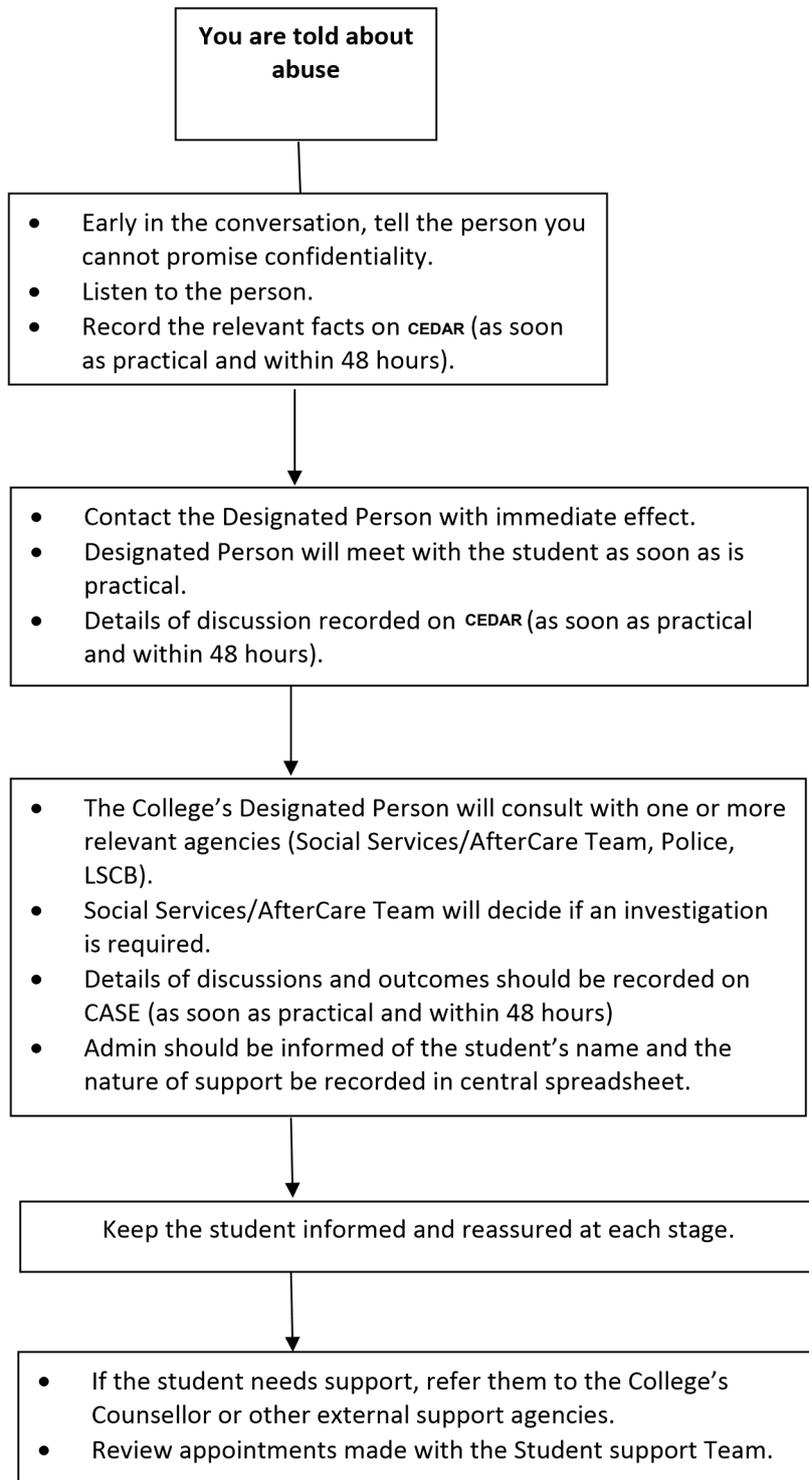
If early help and or other support is appropriate, the CEDAR will be kept under constant review. If the child's situation doesn't appear to be improving, consideration will be given to a referral to children's social care (MASH).

- Any referral to external agencies will take place in parallel with the invoking of the College's internal Disciplinary Procedures, if appropriate.
- The MASH team, appropriate social services and police teams will decide if an investigation should take place.
- Keep the student informed at each stage.

### 3.5.1 Suspicion/Rumour: Action



### 3.5.2 Disclosure of Abuse: Action 4



**It is of paramount importance to preserve the student's privacy during the process – including appropriate use of Cedar. Discuss only with the Designated Person, or in their absence, their deputy or a member of SLT.**

## Safer Recruitment and Selection

The College pays full regard to DfE guidance, “Keeping Children Safe in Education” 2014 and the updates of 2016 and 2018 and the “Guidance for Safer Working Practice for Adults, who work with Children and Young People in Education Settings” (DCSF 2009). It ensures that all appropriate measures are applied in relation to everyone who works in the College e.g. volunteers and staff employed by contractors, in accordance with the College’s Recruitment and Selection Policy.

Safer recruitment practice includes:

- Job descriptions and person specifications, which include reference to safeguarding responsibility.
- Advertising for all temporary and permanent posts.
- Advertisements which include the safeguarding statement.
- Application forms which include a section on criminal record self-disclosure.
- Application information packs which include information about safeguarding policies, induction policy and procedures and the fact that suitability checks that will be conducted.
- Scrutinising applications, via robust short listing procedures, particularly looking at gaps in employment.
- 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.
- Undertaking interviews where questions relating to safeguarding are included.
- Undertaking DBS Certificate checks.
- Induction and Professional Development to include safeguarding awareness training.
- Lead interviewers to have safer recruitment training at regular intervals.

The College will ensure that:

- A DBS Certificate for Child Workforce is obtained for **all** new appointments to the College’s workforce. A risk assessments is carried out, if a DBS certificate cannot be obtained before employment commences.
- A single central record detailing a range of checks carried out on its staff is maintained, and records demonstrating that staff have completed appropriate safeguarding training for their role are also available.
- All new appointments to the College workforce, who have lived outside the UK, are subject to additional checks, as appropriate. These are identified in our Recruitment and Selection Policy and Procedures.
- Supply staff have undergone the necessary safeguarding checks - via the agency.

### **5 Contractors and visitors (Please read alongside separate **Lettings and Visitors policy**):**

All contractors working in College will have undertaken the online safeguarding training completed by all staff. Emma Hart, DSL also carries out bespoke training, outlining policies and procedures for staff under a long term contract.

Those under a long term contract or any visitors in contact with students should be subject to a DBS check. Any visitor without one will not be left unsupervised. Personnel will keep a log of this. Visitors and contractors should wear a visitor’s badge at all times on College premises. A copy of our Health and Safety/Safeguarding summary booklet will be issued and should be read.

## 6 Safeguarding on Residential Trips and Visits

### 6.1 Prior to the trip

Trip Organisers have a responsibility to ensure that any adult (particularly volunteers) accompanying the trip has been subject to a DBS check. If the trip involves staying at a centre (e.g. PGL), organisers should ask to see the Safeguarding Policy and should find out the age and characteristics of any other group who will be using the centre during the visit. Organisers of the trip should ensure that students are aware of expected behaviour on trips and visits and this is also communicated to parents/carers. Organisers should check that sleeping, room sharing, showering and changing arrangements are appropriate and that all students and staff are clear as to when it is appropriate to enter student rooms, both in ordinary and emergency circumstances.

Organisers of College trips need to consider, prior to the trip, whether any student who intends to participate in the trip, poses a risk to other students. Where it is known that a student has a history of violent behaviour or subjecting themselves or others to any form of abuse, an individual risk assessment should be carried out. While such students may benefit from being included on the trip, very careful consideration needs to be taken as to the risk to others. Organisers will also need to be aware of the needs of students with disabilities/mental or physical health issues and ensure that a plan is in place to ensure the safety and well-being of these students. Where appropriate, College LSAs can support this and meetings with the Additional support team will have taken place, prior to the trip. The College reserves the right to judge whether a young person is safe to attend. This is covered in our **Fitness to Study policy**.

### 6.2 On the trip

It is understandable that both staff and students may feel that greater levels of informality are appropriate during trips and visits. However, there is a difference between greater levels of informality and a failure to exercise the duty of care. All appropriate trip paperwork must be filled out, including required parental permission and contact sharing. The following should be ensured at all times:

- Students should not be permitted to wander alone in unfamiliar places.
- Staff should not fraternize or become over familiar with students.
- Staff should ensure that students are safe and reasonably supervised during their free time'.
- Any arising conflict/bullying should be addressed.
- Physical contact with students, as a general rule, should be kept to a minimum.
- Physical restraint may be necessary if a student is putting themselves or others at risk of harm. Any physical restraint used should be reasonable.
- If abuse is suspected/alleged/disclosed during an educational trip/visit:
  - The primary consideration is the immediate protection of the child/vulnerable adult.
  - If a crime has, or is suspected to have taken place, the local police must be contacted immediately.
  - The most senior member of staff on the trip/visit should take charge of the situation and should make contact with the Designated Person or other member of SLT with safeguarding responsibilities. Guidance will be given as to the next steps to be taken.
  - In the event that the Designated Person or other member of SLT cannot be contacted, the local Children's Care department or police should be contacted (i.e. the local authority in the area where the trip is based).

- After the event, the most senior member of staff present on the trip should produce a written account of the allegations, actions taken and pass this immediately to the Designated Person.

### **Foreign exchanges**

With reference to carrying out DBS checks for UK host families, the new guidance still states that Colleges 'should' request a DBS certificate (with the barred list option checked).

Colleges that decide not to carry out the recommended checks should satisfy themselves that they are not putting a young person at risk and be able to justify the decision if challenged.

## **7 Allegations against a College Employee**

(NB: Employee includes volunteers working for the College)

If an allegation or suspicion of abuse is made against a College employee, this must be reported to the Designated Person as soon as possible. In their absence, details of the allegations or suspicion should be reported to the Principal.

On being notified of such a concern, the Designated Person shall:

- notify the Principal or, in her absence, the Deputy Principal;
- take any steps, as they consider necessary, to ensure the safety of the student in question or any other child who may be at risk;
- report the matter to the appropriate Local Authority Designated Officer (LADO);
- ensure that a report of the matter is completed by the person reporting the original concern;
- report the matter to the HR Manager, in confidence.

If the Designated Person is the subject of the allegation or complaint, then the matter must be reported to the Principal or, in their absence, Deputy Principal and not to the nominated members of staff.

If a complaint is made about the Principal, this should be reported directly to the Chair of the Governing Body or in her/his absence, the Designated Governor for Safeguarding.

The substantive decision on whether to investigate under child protection procedures will remain with the appropriate child protection agency. However, it is likely that the Designated Person and the Principal will be involved in consultation with the relevant agency as to the substance of the allegation.

Following such consultation, there will be four possible outcomes:

- an immediate referral under the Child Protection Procedure;
- if there is reason to suppose abuse could have occurred, referral under the Child Protection Procedure or internal disciplinary procedures may be necessary;
- if the allegation was prompted by inappropriate behaviour, this needs to be dealt with under internal disciplinary procedures;
- no action, if the allegation is apparently without foundation.

## **8 Whistle Blowing**

Staff should be aware that young people may feel unable to express concerns in an environment where staff are reluctant to do so. All staff should therefore feel free to voice concerns about the attitude and actions of their colleagues in accordance with the College's **Whistle Blowing Policy**.

The NSPCC whistleblowing helpline is available for staff who do not feel able to raise concerns regarding child protection failures internally. Staff can call: **0800 028 0285 – line is available from 8:00 AM to 8:00 PM, Monday to Friday and Email: [help@nspcc.org.uk](mailto:help@nspcc.org.uk)**

## **9 Safer Working Practice for Staff**

### **9.1 Staff Conduct when working with Young Learners including Work related activity**

It is very important that staff undertake their duties in a professional way and understand the boundaries to employ in their day to day work, both to protect themselves and the young people in their care. In addition to our own staff being made aware of these guidelines, the guidelines and the Safeguarding Policy will be given to all employers when students take part in any work related activity and they will be asked to endorse our procedures, before agreeing to take a student on placement. In relation to our work placements, OSFC commissions Positive Steps to ensure that all relevant legislation and guidance is followed. PSO does not authorise a placement that lasts longer than 15 days and appropriate guidance on checks and communication with placement centres is fully met. Our service level agreement covers this and is regularly updated.

### **9.2 Interviewing Students**

All staff are aware of the potential risks (i.e. false allegations against staff) of interviewing a young person alone, particularly if the young person has an experience of sexual/emotional abuse. Interviewing individual students is an integral part of our work and therefore staff should exercise their own professional judgement and a degree of caution in these situations. All staff should try to ensure that they do not place themselves in any compromising situations, where allegations could potentially be made against them.

Suggested protective measures to consider:

- ask another person (teacher/tutor or young person's friend – as appropriate to the content) to sit in on the interview.
- sit in a room where it is possible to be observed through a window or glass-panelled door.
- do not close the door of the room, if you are not clearly visible from outside the room.

### **9.3 Transporting Students**

Quite often, situations arise where a student will be sent home by taxi and the College has provisions in place to accommodate this. However, situations occasionally arise, which require a member of staff to take a young person home. Staff should be aware of the risks involved in this; when a young person has to be taken home, a male teacher should not normally transport a girl in his car and a female member of staff should not normally transport a male student. It would be

advisable to obtain parental permission, but in any instance, staff should be wary of the possibility of false allegations being made.

## **10 Students who are Subject to Criminal Investigation**

The college understands the power of education in improving the life chances of all young people, including those who may have been involved in early criminal activity.

### **10.1 Procedures for Students Enrolled at College in Process of Criminal Proceedings**

Where a student is subject to a criminal investigation, College may suspend the student until the criminal investigation and legal proceedings have concluded. However, this does not automatically preclude College from progressing with its own disciplinary action. Parents/carers will be kept informed verbally and in writing of any action taken and they will be included in all meetings/risk assessments, where appropriate.

The student and parents/carers should be reminded that, whilst criminal investigations are underway, they are obliged to keep the College informed of any progress and/or change in status regarding his/her case.

Where the nature of the alleged offence suggests that there may be risk to the safety of others or, where the student accused of the offence may be at risk of harm, Associate Director for Inclusion will undertake a risk assessment. This may result in action as follows:

- As a first step, the student may be required to comply with specific conditions, for example, agreeing not to contact another student or students.
- The student may be suspended or excluded, until such a time as any criminal proceedings have concluded. A precautionary suspension or exclusion should not be regarded as a penalty, and does not indicate that the student is presumed guilty of any offence. Suspensions will normally be carried out by a member of SLT.
- The decision to temporarily suspend and/or exclude the student and the reasons why this action is being taken may be communicated verbally in the first instance and followed up in writing within one working day.
- During the suspension, continuation of learning will be supported by the provision and marking of work. The Associate Director for Inclusion will be the designated contact.
- The student may appeal against the decision to suspend and/or exclude in writing in accordance with the College's Disciplinary policy.

Where criminal proceedings (including bail conditions, period of time spent on remand, period of time served in custody following conviction) result in a student being absent from his/her study for a period of less than 4 weeks, it will normally be the case, that the student's place at College will be suspended for this period.

Where criminal proceedings (including bail conditions, period of time spent on remand, period of time served in custody following conviction) result in a student being absent from his/her study for a period in excess of 4 weeks, the student will be deemed withdrawn from the College. The student may then reapply for admission and, as part of the standard admissions process, will be required to declare criminal convictions to be considered prior to a decision regarding an offer of a place.

A conviction in a criminal court shall be taken as conclusive evidence that the alleged offence has occurred.

Where a criminal conviction has been made, the focus of the disciplinary proceedings may include an assessment of the risk posed to staff or students and an assessment of the impact caused by reputational damage to the College.

Where, following initial investigation, a decision has been taken not to proceed to a criminal trial, this does not preclude the College from conducting further investigations and/or instigating disciplinary proceedings in respect of outstanding matters of concern that have not been addressed through criminal proceedings.

### **10.2 Admission Procedure for Student in Process of Criminal Proceedings**

All applicants are asked on the application form if they have a criminal record or are involved in ongoing criminal proceedings. Those answering 'yes' are asked to provide supplementary details.

The supplementary details are screened by the Associate Director for Transition and Skills, who makes an initial assessment of whether the record is relevant or not.

Where the criminal record is considered a risk, the Associate Director for Inclusion undertakes an initial risk assessment and informs the Principal.

The College may seek advice and information from other agencies involved with the applicant, or arrange for the student and parents/carers to be interviewed to collect further information or to clarify or confirm information.

The Associate Director for Inclusion will inform the applicant of the outcome.

The Associate Director for Inclusion will inform any staff, who need to know, if a student is admitted to the course with conditions for managing risk or particular support needs. Otherwise, information on the criminal record is not passed on.

### **10.3 Failure to Declare Criminal Proceedings**

Where it is revealed that a student has not disclosed criminal proceedings or an unspent criminal conviction, the College will consider appropriate disciplinary action, dependent on the severity and impact of the disclosure.

Failing to disclose a minor issue, which does not pose any risk to the College community or impact on the student's ability to complete the course successfully, will be deemed serious misconduct and will result in a Written Warning.

Failing to disclose a significant issue, which might pose a risk to the College community or impact on the student's ability to complete the course, will be deemed gross misconduct and the student's place at College may be withdrawn following investigation and a formal disciplinary hearing. College may suspend the student, until a thorough investigation and risk assessment has been conducted.

#### **10.4 Confidentiality**

The College will deal with all matters relating to declarations of convictions or criminal proceedings in a confidential manner and details will be held securely, alongside other information the College holds.

Information will only be shared with colleagues or other organisations on a 'need to know' basis and only to ensure the safety of all members of the College.

### **11 Work experience**

Employment & Skills Service (part of Positive Steps) ensures that all work experience placements are checked in accordance with employment law. All placements are risk assessed, which includes health and safety, checking the correct insurance is in place and identifying any prohibited or restricted activities by a member of staff suitable qualified to do so (IOSH Managing Safely or NEBOSH Certificate).

An overview of what this entails is:

- Every placements is visited and is placed in the cycle for re-visits based on the risk band of the placements (High, Medium, and Low).
- Employer Liability Insurance is checked and employers are reminded that for the purposes of work experience students are classed as 'employees'.
- Each placement is confirmed in advance, whether it be a 'pledged' placement or an 'own contact' placement.
- Employers are ask to read and sign the ESS 'Principles of Safeguarding' document.
- Employers are asked to read and sign the ESS 'Agreement for Employers Providing Work Experience' document.
- We provide each employer with a suggested Induction Checklist and remind employers of the law with regards to working times and prohibited and restricted activities.
- The ESS Health and safety officers during this visit will also agree a Job Description with the employer. This will detail health and safety and risk assessment requirements that the students (and their parents/guardians) and employers need to be aware of.
- Employer Confirmation letters provide contact details of the respective College and for the Employment and Skills Department (ESS) and Positive Steps.
- Job Descriptions, which should be issued to the student are prepared by ESS and the College is expected to ensure that students receive these prior to each placement.
- ESS provide guidance to schools /colleges and employers re: DBS requirements.

- ESS (Positive Steps) provides a work experience management system to ensure that College staff are also aware of the details, requirements, health and safety and risk assessment of each placement.
- ESS (Positive Steps) provides an additional level of insurance to cover the students causing / being responsible for any damage that occurs during the placements (that would not be covered by other insurance policies).

## 12 Technology and e-Safety

### 12.1 Use of Technology

Please also refer to the College **Email and Internet Policy** and **the E-safety Policy** for further information relating to the above.

All staff in the College will use technology to support and promote the learning and welfare of young people. However, certain safeguards should be remembered:

- Telephone - Staff will NOT give any young person their personal telephone numbers (mobile or home) and will not contact the young person on the young person's mobile phone either by voicemail or by texting, unless this is in line with the College's policy in respect of making contact.
- Communication by technology should only take place using approved College systems and communication of a personal nature must not be conducted with young people. Anything not relating to a student's education or welfare is not deemed appropriate communication.
- Use of Internet: Staff will NOT access or expose young people to unsuitable material on the internet. Staff will ensure that they follow the College's **E-Safety Policy** about access to and use of the internet.

### 12.2 Social Networking

- A member of staff should be aware that, where potentially compromising information is posted on social networking sites, there is a danger that it may be accessed by colleagues and/or young people, and as a result seriously impact upon that colleague's professional standing.
- Should any inappropriate information be posted by a member of staff and it became common knowledge, then professional relationships (those of mutual respect, professional distance, acting as a role model etc.) with students could be compromised. This would be considered as a serious disciplinary offence by the College. It would also be considered that such an incident would be deemed to have brought the profession and/or the College into disrepute.

It may be considered that for people working in the front line of public service, the best advice would be not to use social networking websites. However, if a member of staff chooses to do so, they should be aware of potential pitfalls. Staff are strongly advised that they should:

- be highly circumspect about the information that is posted in public view; criticising the College, colleagues and young people will be considered a serious disciplinary offence and next steps would follow the College's disciplinary policy.
- take steps to ensure that there are appropriate access restrictions in force on personal internet content.

- ensure that they do not engage with young people online or become 'friends' on social sites.

All students are educated on the dangers of sexting, CSE and grooming and safe use of social media. Sexting is when someone sends or receives a sexually explicit text, image or video. This includes sending 'nude photos'.

Students are made aware through the curriculum that sexting is illegal for anyone under the age of 18, regardless of whether they were given permission, someone else sent it to them first, they have never met the other person before, they too are under 18 or it is a selfie.

Students are also educated on other associated issues with sexting such as losing control over personal images, being blackmailed as a result of these images, the negative effects on their self-confidence and self-worth and the legal ramifications of forwarding such images to friends etc.

Any form of sexting will not be tolerated by the College. Parents / carers will be informed as well as other appropriate agencies.

In all cases of abuse, the College will work in partnership with parents / carers and other agencies as appropriate.

Staff are trained in how to recognise the signs of worrying use of the internet and the usual reporting procedures apply.

Daily monitoring of the use of IT takes place using a system called Esafe. Alerts relating to various safeguarding issues, such as radicalisation and CSE are issued as 'flags' to the DSL and personal/progress tutor team to investigate where necessary. This system of monitoring should be explained to students and staff at the start of each new year and reminders issued regularly.

### **13 Professional Boundaries**

Staff at the College may support and advocate for young people but they are not their friends. They are in 'a powerful and potentially difficult position' if professional boundaries are crossed.

A member of staff should see the DSL or deputies if they are at all concerned that boundaries may be difficult to maintain. All staff now pass on information on relatives or relationships in College that may be relevant through filling out a Register of Business and Personal Interests declaration form.

### **14 Absence procedure**

Where a student has been absent and not authorised this appropriately, procedures are in place for progress/personal tutors and subject teachers to call home. Texts are also sent to alert parents.

If a student has taken a holiday/trip, they are seen on their return to check for signs of any safeguarding concern, including the influence of any extremist views. **Staff guidance on specific safeguarding issues:**

#### **Radicalisation and Prevent:**

Since 2010, when the Government published the Prevent Strategy, there has been an awareness of the specific need to safeguard children and families from violent extremism. There have been

occasions, nationally, in which extremist groups have attempted to radicalise vulnerable children to hold extreme views including justifying political, religious, sexist or racist violence, or to steer them into a rigid and narrow ideology that is intolerant of diversity and leaves them vulnerable to future radicalisation.

OSFC values freedom of speech and the expression of beliefs/ ideology as fundamental rights underpinning our society's values. Both young people and teachers have the right to speak freely and voice their opinions. However, freedom comes with responsibility and free speech that is designed to manipulate the vulnerable or that leads to violence and harm of others goes against the moral principles in which freedom of speech is valued. Free speech is not an unqualified privilege; it is subject to laws and policies governing equality, human rights, community safety and community cohesion.

The current threat from terrorism in the United Kingdom may include the exploitation of vulnerable people, to involve them in terrorism or in activity in support of terrorism. The normalisation of extreme views may also make young people vulnerable to future manipulation and exploitation. OSFC is clear that this exploitation and radicalisation should be viewed as a safeguarding concern and seeks to protect students against the messages of all violent extremism including, but not restricted to, those linked to extremist Islamist ideology, Far Right, Neo Nazi, White Supremacist ideology, Irish Nationalist and Loyalist paramilitary groups, and extremist Animal Rights movements.

The College governors, the principal and the DSL will assess the level of risk within the College and put actions in place to reduce that risk. Risk assessment may include consideration of the College's curriculum, assemblies, SEND provision, behaviour policy, the use of College premises by external agencies and other issues specific to the College's profile, community and philosophy.

#### **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. We also include in our definition of extremism calls for the death of members of our 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 commit 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.

Young people 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:

-Identity Crisis – the young person is distanced from their cultural/religious heritage and experiences discomfort about their place in society;

Personal Crisis – the young person may be experiencing family tensions; a sense of isolation; and low self-esteem; they may have dissociated from their existing friendship group and become involved with a new

and different group of friends; they may be searching for answers to questions about identity, faith and belonging;

Personal Circumstances – migration; local community tensions; and events affecting the child’s country or region of origin may contribute to a sense of grievance that is triggered by personal experience of racism or discrimination or aspects of Government policy;

Unmet Aspirations – the young person 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;

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

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

More critical risk factors could include:

Being in contact with extremist recruiters;

Accessing violent extremist websites, especially those with a social networking element;

Possessing or accessing violent extremist literature;

Using extremist narratives and a global ideology to explain personal disadvantage;

Justifying the use of violence to solve societal issues;

Joining or seeking to join extremist organisations; and

Significant changes to appearance and / or behaviour;

Experiencing a high level of social isolation resulting in issues of identity crisis/personal crisis

### **Roles and responsibilities of the Single Point of Contact (SPOC):**

The SPOC for OSFC is Emma Hart, who is responsible for:

Ensuring that staff of the College are aware that you are the SPOC in relation to protecting children from radicalisation and involvement in terrorism;

Maintaining and applying a good understanding of the relevant guidance in relation to preventing children from becoming involved in terrorism, and protecting them from radicalisation by those who support terrorism or forms of extremism which lead to terrorism;

Establishing an effective multi-agency referral and intervention process to identify vulnerable individuals; Safeguarding individuals who might be vulnerable to being radicalised, so that they are not at risk of being drawn into terrorist-related activity; and

Providing early intervention to protect and divert people away from the risks they face and reduce vulnerability.

Raising awareness about the role and responsibilities of OSFC in relation to protecting children from radicalisation and involvement in terrorism;

Monitoring the effect in practice of the College’s curriculum and assemblies to ensure that they are used to promote community cohesion and tolerance of different faiths and beliefs;

Raising awareness within the College about the safeguarding processes relating to protecting children from radicalisation and involvement in terrorism;

Acting as the first point of contact within the College for case discussions relating to children who may be at risk of radicalisation or involved in terrorism;

Collating relevant information for referrals of vulnerable children into the Channel\* process

Attending Channel\* meetings as necessary and carrying out any actions as agreed;

Reporting progress on actions to the Channel\* Co-ordinator; and

Sharing any relevant additional information in a timely manner.

\* Channel is a multi-agency approach to provide support to individuals who are at risk of being drawn into terrorist related activity. It is led by the North West Counter Terrorism Unit.

## **Recognising Signs of Abuse**

**All members of staff have a duty to be vigilant in recognising and reporting signs of the following safeguarding issues. Often signs can be very similar for different kinds of abuse. Please report ALL CONCERNS to the DSL or deputies and procedures will be followed as outlined in this policy.**

### **Physical Abuse**

Physical abuse is deliberately causing physical harm to a child. This might involve punching, kicking, biting, burning, scalding, shaking, throwing or beating with objects such as belts, whips, or sticks. It also includes poisoning, giving a child alcohol or illegal drugs, drowning or suffocation. Physical harm may also be caused when a parent or carer fabricates the symptoms of illness in a child. In pregnancy, an unborn child can be harmed by domestic violence.

Signs of possible physical abuse:

- Any injuries not consistent with the explanation given for them.
- Injuries which occur to the body in places which are not normally exposed to falls or rough games. □ Injuries which have not received medical attention.
- Reluctance to change for, or participate in, games or swimming.
- Bruises, bites, burns and fractures, for example, which do not have an accidental explanation.
- The child gives inconsistent accounts for the cause of injuries.
- Frozen watchfulness.

### **Emotional Abuse**

Emotional abuse is where repeated verbal threats, criticism, ridicule, shouting, lack of love and affection causes a severe adverse effect on a child's emotional development. It includes conveying to children that they are worthless, unloved, inadequate or not valued, only insofar as they meet the needs of another person. Emotional abuse may include: not giving a child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature inappropriate expectations being imposed on a child, over protection and limitation of exploration and learning, or preventing the child from taking part in normal social interaction. It may involve seeing or hearing the ill treatment of another person. 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 ill treatment of children, or it may occur alone.

Signs of possible emotional abuse:

- Depression, aggression, extreme anxiety, changes or regression in mood or behaviour, particularly where a child withdraws or becomes clingy.

- Obsessions or phobias.
- Sudden underachievement or lack of concentration.
- Seeking adult attention and not mixing well with other children.
- Sleep or speech disorders.
- Negative statements about self.
- Highly aggressive behaviour or being cruel to others.
- Extreme shyness or passivity.
- Running away, stealing and lying.

### **Sexual Abuse**

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, whether or not the child is aware of what is happening. This may involve physical contact including penetrative sex, oral sex, masturbation, kissing, rubbing, or touching outside of clothing, or it may involve non-contact activities, such as involving children in watching sexual activities, producing or looking at sexual images, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Abusers can be men, women or other children.

Signs of possible sexual abuse:

- Any allegations made by a child concerning sexual abuse.
- The child has an excessive preoccupation with sexual matters and inappropriate knowledge of adult sexual behaviour for their age, or regularly engages in sexual play inappropriate for their age. Sexual activity through words, play or drawing.
- Repeated urinary infections or unexplained stomach pains.
- The child is sexually provocative or seductive with adults.
- Inappropriate bed-sharing arrangements at home.
- Severe sleep disturbances with fears, phobias, vivid dreams or nightmares, which sometimes have overt or veiled sexual connotations.
- Eating disorders, such as anorexia or bulimia.

### **Neglect**

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in serious impairment of the child's health or development. Neglect is when a parent or carer fails to provide adequate food, clothing, shelter (including exclusion from home or abandonment), medical care, or protection from physical and emotional harm or danger. It also includes failure to ensure access to education or to look after a child because the carer is under the influence of alcohol or drugs. In pregnancy, neglect may occur as a result of misusing alcohol or drugs.

Possible signs of neglect:

- Dirty skin, body smells, unwashed, uncombed hair and untreated lice.
- Clothing that is dirty, too big or small, or inappropriate for weather conditions.
- Frequently left unsupervised or alone.
- Frequent diarrhoea.
- Frequent tiredness.
- Untreated illnesses, infected cuts or physical complaints, which the carer does not respond to.
- Frequent hunger.
- Overeating junk food.

### **Further information on Child Sexual Exploitation (CSE)**

[www.gov.uk/government/publications/what-to-do-if-you-suspect-a-child-is-beingsexually-exploited](http://www.gov.uk/government/publications/what-to-do-if-you-suspect-a-child-is-beingsexually-exploited)

- Child sexual exploitation (CSE) involves exploitative situations, contexts and relationships where young people receive something (for example food, accommodation, drugs, alcohol, gifts, money or in some cases simply affection), as a result of engaging in sexual activities. Sexual exploitation can take many forms ranging from the seemingly 'consensual' relationship, where sex is exchanged for affection or gifts, to serious organised crime by gangs and groups. What marks out exploitation is an imbalance of power in the relationship. The perpetrator always holds some kind of power over the victim which increases as the exploitative relationship develops. Sexual exploitation involves varying degrees of coercion,
- intimidation or enticement, including unwanted pressure from peers to have sex, sexual bullying including cyberbullying and grooming. However, it also important to recognise that some young people who are being sexually exploited do not exhibit any external signs of this abuse.

The following may be indicators that young people are at risk of sexual exploitation:

- unexplained gifts or new possessions;
- associating with other young people involved in exploitation;
- older boyfriends or girlfriends;
- sexually transmitted infections or becoming pregnant;
- changes in emotional well-being and self-harm;  misusing drugs and alcohol;  being estranged from family;
- going missing for periods of time or regularly coming home late, regularly missing education or not taking part in education.
- being involved in offending.
- a change in physical appearance.
- evidence of sexual bullying/vulnerability through the internet.
- being estranged from family.
- receipt of gifts from unknown sources.
- recruiting others into exploitative situations.

OSFC works with Oldham Community Safety and uses the Rose Data process to assess the risk of CSE.

Young people who are homeless or missing from home may well display similar warning signs to staff.

The Homeless Reduction Act is detailed in the statutory guidance at the end of this document and staff should inform the DSL of any suspicions that a student may no longer be living at home, so that the DSL can work with appropriate agencies and support.

### **Female Genital Mutilation (FGM) and “honour based” violence**

[www.gov.uk/government/publications/female-genital-mutilation-guidelines](http://www.gov.uk/government/publications/female-genital-mutilation-guidelines)

- So-called ‘honour based’ violence (HBV) encompasses 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. All forms of HBV are abuse (regardless of the motivation) and should be handled and escalated as such. If in any doubt, college staff will speak with the designated safeguarding lead. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBV, or already having suffered HBV.
- If staff have a concern regarding a child that might be at risk of HBV, they should activate the usual safeguarding procedures, informing the DSL, for multi-agency liaison with police and children’s social care.
- FGM is defined by the World Health Organisation as "all procedures that involve partial or total removal of the external female genitalia, or other injury to the female genital organs for non-medical reasons". There is no cultural or religious justification for FGM and it has been illegal in this country since 1985. If it is performed on a British citizen in the UK or overseas, it is a crime. It can leave women and girls traumatised, as well as in severe pain, cause difficulties in child birth, and in some rare cases it can lead to death. Current prevalence studies estimate that as many as 60,000 women and girls in the UK could be at risk of FGM, and over 137,000 may already be living with the consequences.
- The main countries of origin where FGM is practiced include Africa and the Middle East.
- FGM frequently involves young girls between the ages of infancy and 15 years of age.
- Professionals need to be alert to the possibility of a girl being at risk of FGM, or already having suffered FGM. There is a range of potential indicators that a child or young person may be at risk of FGM, which individually, may not indicate risk, but if there are two or more indicators present, this could signal a risk to the child or young person. Victims of FGM are likely to come from a community that is known to practise FGM. Professionals should note that girls at risk of FGM may not yet be aware of the practice or that it may be conducted on them, so sensitivity should always be shown when approaching the subject.

#### **Warning signs of Girls at Risk:**

- Member of a community, whose country of origin practises FGM and that is less integrated into UK society
- A girl whose sister or other relatives have undergone FGM
- A girl whose parents have withdrawn her from lessons featuring FGM (where other warning signs are also present)
- Families making preparations for an extended holiday, including arranging vaccinations in the country of origin.
- Families may practice FGM in the UK when a female family member elder is visiting from the country of origin.
- You may hear reference to FGM in conversation, for example, a girl may tell other students about it.

Pain and issues with walking would be a warning sign. There have been occasions when women have presented with less common warning signs such as cut or shaved hair as a form of punishment for disobeying or perhaps "dishonouring" her family. In some cases, a girl may report that she has been taken to a private practice to be examined to see if she is a virgin. There have been reports of women presenting in the NHS with symptoms associated with poisoning. In certain communities, it is considered important that women undergo female genital mutilation (FGM) before being able to marry – usually this will be performed during childhood, but there have been reports of young girls or young women undergoing FGM just before a forced marriage. FGM has been a specific offence in the UK since 1985 and extra-territorial offences were created in 2003 to deter people from taking girls overseas for the purposes of FGM.

- Mandatory reporting of FGM - duty:

**Section 74 of the Serious Crime Act 2015 places a statutory duty upon teachers along with regulated health and social care professionals in England and Wales, to report directly to the police where they discover that FGM has carried out on a girl under 18 years. Those failing to report such issues will face disciplinary sanctions. Further detail can be found at**

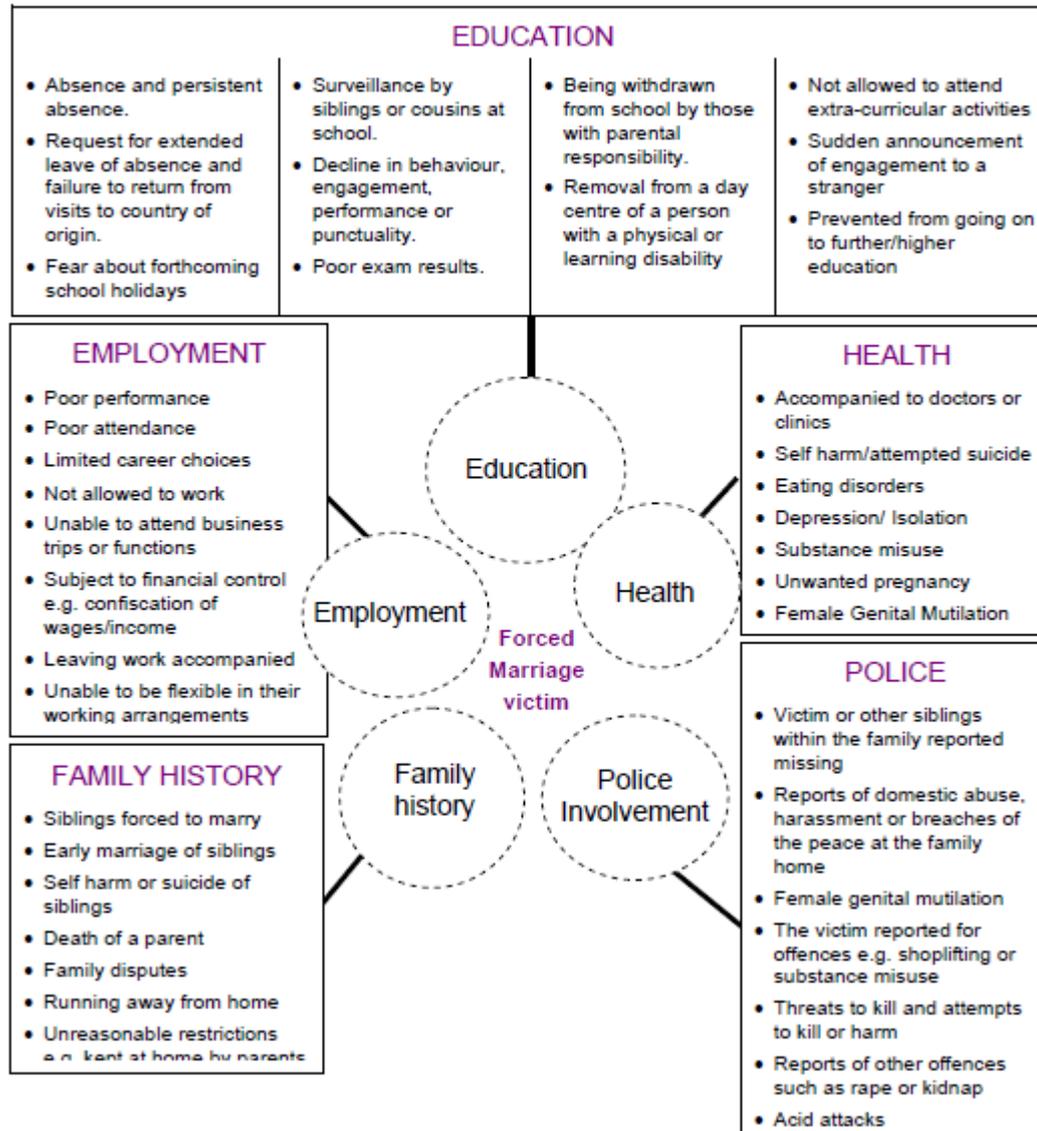
**[www.gov.uk/government/publications/mandatory-reporting-of-female-genitalmutilation-](http://www.gov.uk/government/publications/mandatory-reporting-of-female-genitalmutilation-)**

#### **Forced Marriage - Indicators**

Both men and women facing forced marriage may become anxious, depressed and emotionally withdrawn with low self-esteem. They may come to the attention of staff for a variety of reasons, some of which are described in the diagram on the following page.

## CHART OF POTENTIAL WARNING SIGNS OR INDICATORS

These indicators are not intended to be an exhaustive list.



### **Peer on peer abuse**

Children can abuse other children. This is generally referred to as peer on peer abuse and can take many forms. This can include (but is not limited to) bullying (including cyberbullying); sexual violence and sexual harassment; physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm; sexting and initiating/hazing type violence and rituals. The College has a zero tolerance policy on this kind of abuse and all cases should be reported to the DSL or another member of SLT, where they will be fully dealt with and followed up. Support will be offered to both the 'victim' and 'perpetrator'. The Anti-bullying policy must also be followed and incidents are logged on our central spreadsheet.

### **Sexual violence and sexual harassment between children in schools and colleges**

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.

Victims of sexual harassment or violence 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 physical and verbal) and are never acceptable. It is important that **all** victims are taken seriously and offered appropriate support. Staff should be aware that some groups are potentially more at risk. Evidence shows girls, children with SEND and LGBT children are at greater risk.

Staff 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"; and
- challenging behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them.

The new Part 5 section in 'Keeping Children Safe in Education' on 'Child on Child Sexual Violence and Sexual harassment' sets out statutory duties for Colleges from 3<sup>rd</sup> September 2018. The guidance outlines effective safeguarding practice that covers recognising a report, risk assessment following a report of sexual violence, and next steps considerations (including safeguarding and supporting the victim, perpetrator and the circumstances where the College will need to separate the victim and perpetrator).

If a perpetrator or victim moves to another institution, all information must be passed on to the appropriate Designated person and in good time.

The DSL will make all decisions on a case-by-case basis, supported by other agencies, as advised in the guidance.

## Monitoring and Review

This policy will be reviewed by the Associate Director for Inclusion, on a regular basis, in accordance with legislative developments and the need for good practice.

## Document History

Date	Section Reviewed / Updated	Author	Authorised
April to July 2014	Whole policy reviewed / updated	AMR/EHA	JCL
September 2015	Whole new policy written	EHA	JCL, HDN
January 2016	Whole policy reviewed / updated	EHA	HDN
April 2016	Whole policy reviewed/updated	EHA	JCL, HDN
Sept 2016	Whole policy reviewed/updated	EHA	JCL
June 2017	Whole policy reviewed/updated	EHA	PRS
September 2018	Whole policy reviewed/updated	EHA	

## Appendix 1

<https://www.gov.uk/government/publications/keeping-children-safe-in-education--2>