

**Due for review by Corporation October 2024**

## **Policy on Safeguarding Young People**

- This policy is reviewed annually by the Corporation. It is intended that the policy is a 'live' document and should be updated when necessary, 'at least' once a year.
- Designated Senior Lead (DSL) refresher training is up to date across all named safeguarding personnel.
- The College produces regular briefings for staff on safeguarding matters in line with training requirements as directed in Keeping Children Safe in Education (KCSIE) September 2023.
- The WQE and Regent College Group Corporation will receive safeguarding update training by the end of **October 2023** and regular safeguarding updates during the academic year thereafter (through site visits, E-Learning and Corporation meeting updates etc depending on most appropriate delivery method).
- The College has a designated safeguarding Governor. This is Sofie Dadge. Staff and Governors have received up to date 2023 Safeguarding and Prevent training sessions and have also completed on-line training tasks to illustrate their understanding.
- All newly appointed staff and Governors receive full safeguarding and Prevent training within our induction process, all are required to sign agreeing that they have read and understood the statutory documents and training delivered.
- All staff will receive the following documentation annually, they will read and acknowledge they have understood each document:
  - All Keeping Children Safe in Education (2023) [Part One]; who work directly with children read at least Part One of this guidance. Staff who do not work directly with children read Annex A (a condensed version of Part One)
  - Staff Code of Conduct
  - Safeguarding Young People Policy
  - Student Guidance and Intervention Policy
  - Bereavement Policy
  - Prevent Strategy and Risk Assessment
  - Sexual Abuse Action Plan
  - Working Together to Safeguard Children 2018
- The College is represented at the City Safeguarding Leads Forum.
- The College is represented on the City and County FE Safeguarding Forum.
- The College is represented at the City Looked After Children (LAC) DSL Forum.
- The College represents the FE sector at the Prevent Steering Group (PSG).
- This document utilises the terms children, young people and students when referring to people aged 16 plus in our care.
- Safeguarding is defined as:
  - Protecting children from maltreatment;

- Preventing impairment of children’s mental and physical health or development;
- Ensuring that children are growing up in circumstances consistent with the provision of safe and effective care; and
- Taking action to enable all children to have the best life outcomes.

Philip Parkinson (**Chair of Governors**)

**Signature:** .....

## **1. POLICY STATEMENT**

1.1 The College fully recognises its responsibilities for safeguarding. It is committed to establishing a safe environment in which students can learn and develop. The aim of the policy is to safeguard and promote student welfare, safety and health by fostering an honest, open, caring and supportive climate. The students’ welfare is of paramount importance.

1.2 The College adopts an open and accepting attitude towards its students as part of its responsibility for pastoral care. The College encourages students and parents/carers to feel free to talk about any concerns and to see this as a safe place when there are difficulties. All concerns will be taken seriously and students are encouraged to seek help when needed.

1.3 In attempting to ensure this the College will:

- 1.3.1 Establish and maintain an ethos where students feel secure and are encouraged to talk, and are listened to;
- 1.3.2 Ensure that students know that there are staff in the College whom they can approach if they are worried or in difficulty;
- 1.3.3 Include in its offer activities and opportunities which equip students with the knowledge and skills they need to stay safe from abuse (including online), and to know to whom they can turn for help;
- 1.3.4 Teach students to recognise when they are at risk and how to get help when they need it. During Personal Progress Mentor (PPM) sessions, students receive up to date Relationships, Sex and Health Education (RSE) in line with DfE Statutory Guidance from September 2021. The Welfare and Skills Team provide daily support, both planned and unplanned proactive support, where a staff member or student is referred as at welfare risk. The Safeguarding Team have a duty rota to always ensure availability, offering advice and guidance to students and staff. All staff are trained to signpost students to the PPM, Welfare and Skills or Safeguarding Team as appropriate;
- 1.3.5 Ensure every effort is made to establish effective working relationships with parents/carers and colleagues from other agencies;

- 1.3.6 Operate Safer Recruitment procedures and make sure that all appropriate checks are carried out on new staff and volunteers who will work with young people, including identity, right to work, enhanced Disclosure and Barring Service (DBS) criminal record and barred list (and overseas where needed), references, and prohibition from teaching.
  - 1.3.7 Recognise the wider importance of considering wider environmental factors in a child's life that may be a threat to their safety and/or welfare. This is known as Contextual Safeguarding and is referred to in Working Together to Safeguard Children (2018); and in Keeping Children Safe in Education (2023). The College assesses the risks and issues in the wider community when considering the wellbeing and safety of its students. Extra-familial harm is more likely to occur during adolescence and College safeguarding staff are aware of the signs and symptoms of such challenges;
  - 1.3.8 Ensure all staff are aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. College staff are not expected or trained to diagnose mental health conditions or issues but may notice behaviours that may be of concern;
  - 1.3.9 Ensure staff have training stipulating that mental health concern(s) about a child may also be a safeguarding concern. They should raise the issue by informing the Designated Safeguarding Lead or a member of the Safeguarding Team;
  - 1.3.10 Utilise the College Mental Health Advisor and staff who have received senior mental health lead training to support students who experience mental health challenges, in line with Mental Health and Behaviour in Colleges November 2018;
  - 1.3.11 Recognise that when a student has a social worker, it is an indicator that the child is more at risk than most students. This may mean that they are more vulnerable to further harm, as well as facing educational barriers to attendance, learning, behaviour and poor mental health. We take these needs into account when making plans to support students who have a social worker.
- 1.4 This policy applies to all staff, Governors and visitors to the College. We recognise that safeguarding is the responsibility of all staff. We will ensure that all parents/carers and other working partners are aware of our safeguarding commitment by mentioning it in our prospectus, displaying appropriate information in college and on the College website.
- 1.5 This policy sets out how the College Corporation discharges its statutory responsibilities relating to safeguarding and promoting the welfare of students at the College.

- 1.6 This policy formally applies to young people aged under the age of 18 years. However, the College recognises that it has a continued duty of care for students above this age and will apply it to all students at the College. All references in this Policy to students, children and young people refer also to vulnerable adults and adults enrolled in our college.
- 1.7 WQE College will fulfil local and national responsibilities and accepted best practice as laid out in the following documents.

This policy is based on the Department for Education's statutory guidance [Keeping Children Safe in Education \(2023\)](#) and [Working Together to Safeguard Children \(2018\)](#), and the [Governance Handbook](#). We comply with this guidance and the arrangements agreed and published by our three local safeguarding partners (the Local Authority; the Clinical Commissioning Group; the Chief Officer of Police).

This policy is also based on the following legislation:

- [The Children Act 1989](#) (and [2004 amendment](#)), which provides a framework for the care and protection of children
- Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the [Serious Crime Act 2015](#), which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18. Female Genital mutilation Act 2003/Updated guidance July 2020
- [Statutory guidance on FGM](#), which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM
- [The Rehabilitation of Offenders Act 1974](#), which outlines when people with criminal convictions can work with children
- Schedule 4 of the [Safeguarding Vulnerable Groups Act 2006](#), which defines what 'regulated activity' is in relation to children
- [Statutory guidance on the Prevent duty](#), which explains colleges' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism
- The College Staffing (England) Regulations 2009 & Amended Regulations 2015; Safer Recruitment in Education including
- Guidance for Safer Working Practice Rev 2019 - (Safer Recruitment consortium)
- Leicester Safeguarding Children's Partnership Board (LSCPB)
- Voyeurism (Offences Act) 2019

**1.8 Definitions of terminology within this policy:**

- 1.8.1 **Safeguarding and promoting the welfare of children** means:
- Protecting children from maltreatment

- Preventing impairment of children's mental and physical health or development
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- Taking action to enable all children to have the best outcomes

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

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

1.8.4 **Neglect** is a form of abuse and is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development.

1.8.5 **Sharing of nudes and semi-nudes** (also known as sexting or youth produced sexual imagery) is where children share nude or semi-nude images, videos or live streams.

1.8.6 **Children** includes everyone under the age of 18 and these principles will be applied, as appropriate, to all students on College roll, even if above age 18.

1.8.7 The following three **safeguarding partners** are identified in Keeping Children Safe in Education. They will make arrangements to work together to safeguard and promote the welfare of local children, including identifying and responding to their needs:

- The Local Authority (LA)
- A Clinical Commissioning Group
- The Chief Officer of Police

## 2 DESIGNATED STAFF WITH RESPONSIBILITY

### 2.1 Designated Safeguarding Lead (DSL)

2.1.1 The responsibilities of the Designated Safeguarding Lead are stated in Keeping Children Safe in Education September 2023.

2.1.2 The DSL is a member of the College Executive Leadership Team with a key duty to take lead responsibility for raising awareness within the staff of issues relating to the welfare of young people, and the promotion of a safe environment for young people learning within the College.

2.1.3 The DSL has received training in child/vulnerable adult protection issues and inter-agency working, as required by KCSIE September 2023 and will continue to undertake refresher training at least every two years. The DSL will provide an annual report to the Corporation setting out how the College has discharged its duties. The DSL is responsible for reporting deficiencies in procedure or policy identified by Safeguarding Partners to the Corporation at the earliest opportunity.

2.1.4 In addition to the above, the DSL is responsible for overseeing the operation of procedures at the College. This involves:

- Overseeing the referral of cases of suspected abuse/radicalisation or allegations to the City/County Council's Department of Children and Young People's Services, Specialist Services First Response Children's Duty or other agencies (such as Channel) as appropriate. Referral to the Police where a crime may have been committed.
- Overseeing the Operation Encompass programme (information on witness to domestic abuse and wider safeguarding concerns).
- Provision of information to the Safeguarding Partners and Local Authorities on safeguarding in compliance with section 14B of the Children Act 2004.
- Providing advice and support to other staff on issues relating to safeguarding.
- Maintaining a secure, proper record of any referral, complaint or concern (even where that concern does not lead to an external referral). This will include monitoring and acting upon individual concerns, patterns of concerns or complaints.
- Ensuring that parents/carers of young people within the College are aware of the College's Safeguarding Policy.
- Liaising with the Children and Young People's Services Department of the Local Authorities, the Safeguarding Partners and other relevant agencies.
- Liaising with partner colleges, colleges and through the Local Authorities, to ensure that appropriate transition arrangements are in place.
- Liaising with the Corporation and the Local Authorities on any deficiencies brought to the attention of the Corporation and how these should be rectified.
- Being aware of students who have a social worker.
- Help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues with teachers and College leadership staff.

- 'The Data Protection Act 2018 and GDPR do not prevent the sharing of information for the purposes of keeping children safe.' 'This includes allowing practitioners to share information without consent...'
- Ensuring that all staff receive safeguarding training and are aware of College Policy and Procedures. That induction training covers safeguarding and Staff Code of Conduct and that from this staff can recognise and report any concerns immediately they arise.
- Obtain access to resources and effective training for all staff and attend refresher training courses every two years.
- To attend and contribute to Child Protection conferences, Child in Need, Core Group and other meetings when required (or ensure an appropriate representative from the Safeguarding Team can attend or contribute).
- Convening and chairing regular meetings of the College Safeguarding Team.
- When students leave the College, ensure their safeguarding information is passed on to any receiving institution as soon as possible, receiving a signature for receipt. This will be done with the agreement of the student where appropriate.
- Being the Single Point of Contact (SPOC) for Prevent related issues.
- When services or activities are provided by WQE College under the direct supervision or management of College staff our arrangements for child protection will apply. However, where services or activities are provided separately by another body, the DSL and appropriate Tier 3 leader (Curriculum Area Leader for Health and Sport for sporting activities) will seek assurance that the provider concerned has appropriate safeguarding and child protection policies and procedures in place (including inspecting these as needed) and ensure that there are arrangements in place for the provider to liaise with the College on these matters where appropriate.
- The DSL will be given the time, funding, training, resources and support to:
  - Provide advice and support to other staff on child welfare and child protection matters
  - Take part in strategy discussions and inter-agency meetings and/or support other staff to do so
  - Contribute to the holistic assessment of students including welfare, safeguarding and academic progress
  - Refer suspected cases, as appropriate, to the relevant body (Local Authority Children's Social Care, Channel programme, Disclosure and Barring Service, and/or Police), and support staff who make such referrals directly

2.1.5 The DSL will also keep the Principal informed of any issues, and liaise with Local Authority case managers and designated officers for child protection concerns as appropriate.

2.1.6 The full responsibilities of the DSL and deputies are set out in their job description.

## **2.2 Designated staff members – The Safeguarding Team**

2.2.1 The College maintains a further group of staff trained as Deputy Safeguarding Leads. Each member of the Safeguarding Team:

- Reports to and liaises with the DSL on safeguarding issues.
- Is trained and able to receive and make appropriate referrals to external agencies\*.
- Is available to provide advice and support to other staff on issues relating to safeguarding.
- Has responsibility to be available to listen to students at the College.
- Will deal with individual cases, including attending case conferences and review meetings as appropriate.
- Has received training in child protection/vulnerable adult issues and inter-agency working, as required by KCSIE 2023, and will receive refresher training at least every two years.
- Has had regular training regarding the online monitoring and filtering operational for the College.

\*The College internal procedures ensure that decisions on referrals to external agencies are made in collaboration with senior members of the team.

## **2.3 Corporation**

2.3.1 In accordance with the statutory guidance 'Keeping Children Safe in Education', September 2023, the Corporation will ensure that:

- The College has a safeguarding policy, procedures and training in place which are effective and comply with the law at all times. The policy is made available publicly.
- The Corporation is aware of its obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty) and the local multi-agency safeguarding arrangements.
- The College operates Safer Recruitment practices, including appropriate use of references and checks on new staff and volunteers. Ensuring that staff involved in the recruitment process have undertaken Safer Recruitment Training.
- There are procedures for dealing with allegations of abuse against members of staff and volunteers.

- The Chair of Governors will act as the 'case manager' if an allegation of abuse is made against the Principal, where appropriate (the Corporation is responsible for appointing an appropriate case manager).
- There is a member of the Executive Leadership Team designated to take lead responsibility for dealing with safeguarding (the 'Designated Safeguarding Lead') and that there is always cover for this role.
- The Designated Safeguarding Lead undertakes effective Local Authority training and this is refreshed every two years.
- The Principal, and all other staff and volunteers who work with students undertake appropriate training which is regularly updated, and that new staff and volunteers are made aware of the College arrangements for safeguarding and their responsibilities. This will form part of any induction process.
- Any deficiencies or weaknesses brought to the attention of the Corporation will be rectified without delay.
- The Chair of Governors (or, in the absence of a Chair, the Vice-Chair) deals with any allegations of abuse made against the Principal, in liaison with the Local Authority Allegations Manager (LADO).
- Effective policies and procedures are in place and updated annually, including the Code of Conduct for staff.
- There is an individual named member of the Corporation who is designated as the Safeguarding Governor. This person will liaise with the DSL and will contribute to the provision of information and reports to the Corporation.
- The College contributes to inter-agency working in line with statutory guidance 'Working Together to Safeguard Children' 2018 (most recent guidance as of September 2023), including providing a coordinated offer of early help for students who require this. Safeguarding arrangements consider the procedures and practice of the Local Authorities and Safeguarding Partners.

## 2.4 **Principal**

### 2.4.1 The Principal will ensure that:

- The policies and procedures adopted by the Corporation are effectively implemented and followed by all staff.
- Sufficient resources and time are allocated to enable the DSL and other staff to discharge their responsibilities, including taking part in strategy discussions and other inter-agency meetings, and contributing to the assessment of students.
- Allegations of abuse or concerns that a member of staff or adult working at the College may pose a risk of harm to a child or young person are notified to the Local Authority Allegations Manager/Local Authority Designated Officer.

- All staff feel able to raise concerns about poor or unsafe practice regarding students, and such concerns are addressed sensitively and effectively in a timely manner.
- All staff are made aware that they have an individual responsibility to pass on safeguarding concerns to a DSL and that if all else fails to report these directly to Children's Social Care Services or the Police.

### **3 REFERRAL PROCESS**

The College will refer safeguarding concerns to the City/County Department of Children and Young People's Services or the Police, where this is deemed appropriate. In cases of risk of radicalisation there is a standard Prevent referral process.

The College adheres to agreed processes for referral for each relevant agency. Referrals will only normally be undertaken by the identified Designated Safeguarding Leads.

#### **3.1 Dealing with disclosure of abuse: The College procedure for reporting concerns**

3.1.1 The College has procedures for reporting cases of suspected abuse of young people. These procedures are highlighted to all members of staff and all staff newly appointed to the College during their induction. The College Safeguarding Team use Cpoms to record safeguarding concerns and share these files, where appropriate, with external agencies.

3.1.2 All staff are aware that students may not feel ready or know how to tell someone that they are being abused, exploited or neglected, and/or they may not recognise their experiences as harmful. For example, children may feel embarrassed, humiliated or being threatened. This could be due to their vulnerability, disability and/or sexual orientation or language barriers. This should not prevent staff from having a professional curiosity and speaking to the Safeguarding Team if they have concerns about a child. The Safeguarding Team recognise that it is important that staff determine how best to build trusted relationships with children and young people which facilitate communication and staff are trained accordingly.

3.1.3 See flowchart in Appendix: PROCEDURES FOR REPORTING CASES OF SUSPECTED ABUSE INVOLVING YOUNG PEOPLE.

### **4 RECORDS, MONITORING AND TRANSFER**

4.1 Well-kept records are essential to good safeguarding practice. All staff are clear about the need to record and report concerns about a student within the College. The

Designated Safeguarding Lead is responsible for such records and for deciding at what point these records should be passed to other agencies.

- 4.2 Records are stored apart from normal records.
- 4.3 Safeguarding records and related Police Data Protection requests are stored securely, with access confined to specific staff in or associated with the Safeguarding Team.
- 4.4 Safeguarding records are reviewed regularly to check whether any action or updating is needed. These records are updated following any intervention, meeting etc.
- 4.5 When students transfer to the College from college their safeguarding records should also be transferred. Best practice is for these to be received directly by a Designated Safeguarding Lead with any necessary discussion or explanation and to obtain a signed and dated record of the transfer within five working days. The Safeguarding Administrator will be responsible for liaising with all stakeholders to gather the information required.
- 4.6 The College has processes for DSLs to follow up on information received.
- 4.7 The College replicates this process when students move from the College.
- 4.8 The College keeps an electronic record of all safeguarding concerns using Cpoms. The College also retains paper documentation sent by external agencies in the office of Associate Principal (Students and Welfare) in locked filing cabinets at University Road.

## **5 SUPPORT FOR STUDENTS AND COLLEGE STAFF**

### **Support for students**

- 5.1 WQE recognises that students who are/have been abused or who witness/have witnessed violence may find it difficult to develop a sense of self-worth. For such students, WQE may be one of the few stable, secure and predictable components of their lives. Other students may be vulnerable because they have a disability, are in care/care leavers, or are experiencing some form of neglect. WQE will seek to provide such students with the necessary support and to build their self-esteem and confidence, working with external agencies as relevant.
- 5.2 WQE recognises that students sometimes display abusive behaviour themselves and that such incidents or allegations are recorded and referred for appropriate support and intervention.
- 5.3 At WQE students are taught about safeguarding, including online, through various teaching and learning opportunities, as part of providing a broad and balanced curriculum. Students are taught to recognise when they are at risk and how to get help when they need it. Our PPM Team communicate/meet with all students on a 1-2-1 basis at a minimum of weekly intervals and deliver safety materials and advice. Our Welfare and Skills Team work with identified groups of vulnerable students in both a proactive and reactive manner (following referrals from staff and student self-referrals), to educate regarding the risks of abuse, online risk and extremism etc.
- 5.4 The College strictly adheres to the Digital and Technology Standards in Schools and Colleges March 2023 (including Cyber Security Standards). When students use the

College's network to access the internet, they are protected from inappropriate content by our online filtering and monitoring systems. Office 365 Compliance software further complements internet filtering, ensuring that all communications are tracked.

Inappropriate language, imagery, suggestive language or imagery and 'slang' language are all tracked by the system and a report produced for the DSL. Microsoft Teams chat and email have 24/7 monitoring and non-compliance is attached to College disciplinary procedures. This is regularly reviewed by the Safeguarding Governor when completing on-site visits and in Safeguarding Team meetings as part of their cycle of business and when incidents of concern arise. However, many students are able to access the internet using their own data plan and 4G/5G networks. To minimise inappropriate use, as a college we discuss this issue openly in PPM sessions and in 1-2-1 PPM sessions. We engage in webinars and seminars held by external agencies and have a close working relationship with our local police force, who offer frequent in-college support sessions for all students, as well as bespoke, personalised workshops. We work closely with parents/carers to educate them regarding the potential issues on students accessing unfiltered internet content.

- 5.5 The College provides a Student Assistance Programme (SAP), a 24/7 service that students are able to use for support if required. They provide services such as counselling, legal advice, emergency advice, housing advice etc and feed back information to the College where appropriate for safeguarding purposes or, when they have permission to do so, where there is not a safeguarding concern. The College receives half-termly reports on the demographic of students contacting the SAP for analysis.
- 5.6 The College provides an anonymous reporting service called Whisper that enables students to text, online chat or email a concern anonymously. This is to encourage disclosure and is monitored by the Safeguarding Team.
- 5.7 The College works in conjunction with the University of Leicester (UOL) to provide a SafeZone service for students (and staff). Students are able to log into the app via their phone and press for help in emergency situations. UOL are contracted to provide a rapid support service within the agreed SafeZone boundary.
- 5.8 Some students have an increased risk of abuse, and additional barriers can exist for some students with respect to recognising or disclosing it. We are committed to anti-discriminatory practice and recognise students' diverse circumstances. We ensure that all staff in the Safeguarding Team understand and appreciate that students need the same protection, regardless of any barriers they may face. We give special consideration to students who:
- Have special educational needs (SEN) or disabilities or health conditions (see section 10)
  - Are young carers
  - May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality LGBTQ+
  - Have English as an additional language

- Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence
- Are at risk of FGM, sexual exploitation, forced marriage, or radicalisation
- Are asylum seekers
- Are at risk due to either their own or a family member's mental health needs
- Are looked after or previously looked after (see section 12)
- Whose parent/carer has expressed an intention to remove them from College to be home educated
- Pupils with a family member in prison or who are affected by parental offending
- Pupils at risk of honour-based abuse (such as female genital mutilation or forced marriage)
- Pupils who are persistently absent from College, including persistent absences for part of the College day

5.9 The Safeguarding Team will ensure that the implementation of an appropriate adult, where required, takes place. This is in line with PACE Code C 2019.

### **Support for staff**

5.10 As part of their duty to safeguard and promote the welfare of students, staff may hear information, either from the student as part of a disclosure or from another adult that will be upsetting. Where a member of staff is distressed as a result of dealing with a safeguarding concern, they should in the first instance speak to the Designated Safeguarding Lead about the support they require. The Designated Safeguarding Lead should seek to arrange the necessary support.

5.11 The College provides an Employee Assistance Programme (EAP), a 24/7 service which staff are able to use for support if required. They provide services such as counselling, legal advice, emergency advice, housing advice etc.

5.12 All Safeguarding Team members are provided with specialist safeguarding supervision once every half term for 1.5 hours. More is provided if required/requested.

5.13 All College staff have access to the SafeZone app both on their mobile devices and on College desktop computers - (see 5.7)

## **6 WORKING WITH PARENTS/CARERS**

WQE will:

- Ensure that parents/carers understand the responsibility placed on the College and staff for safeguarding by setting out its obligations in relevant marketing information and formats.

- Undertake appropriate discussion with parents/carers prior to involvement of Children & Family Services, Children's Social Care or another agency, unless to do so would place the student at risk of harm or compromise an investigation.

## **7 STAFF TRAINING**

- 7.1 All staff will receive training adequate to familiarise them with safeguarding issues and their responsibilities and the College's procedures and policies, with refresher training annually and termly updates.
- 7.2 In line with guidance in KCSIE 2023, WQE supplements this training with regular updates and bulletins. These are produced at least termly and circulated to all staff. Staff are required to confirm having received, read and understood these briefings and that they form part of their legislative requirement to update.
- 7.3 The College may focus training on issues specific to its circumstances.
- 7.4 The College maintains records of all training undertaken.

## **8 RECRUITMENT AND SELECTION PROCESSES**

- 8.1 The College has written recruitment and selection procedures. The policy and procedures are designed with the aim of safely recruiting staff and governors and providing a safe environment for young people to learn in. Key aspects of the procedures and processes are as follows:-
- 8.1.1 Job Descriptions are available for all roles. All jobs contain explicit responsibility for safeguarding and promoting the welfare of students, having due regard to the College's Safeguarding Policy.
- 8.1.2 A Person Specification setting out the key selection criteria for all roles. The person specification includes demonstrating commitment to safeguarding policies and the suitability to work with young adults.
- 8.1.3 A standard application form that provides for the collection of information on applicants that enables the College to recruit safely.
- 8.1.4 Advertising of posts externally as appropriate.
- 8.1.5 A requirement for those appointed to produce documentary evidence of academic/vocational qualifications.
- 8.1.6 Standard interview questions for appointments for key staff who work with young people exploring their suitability in this respect. Interviewers follow up on any gaps or discrepancies in the employment history of applicants.
- 8.1.7 Candidates are invited to give details of two referees, one of whom must be their current or most recent employer. If a candidate is not currently working with children/young people but has done so in the past, the College will obtain an additional reference from the employer by whom the candidate was most recently employed in working with children/young people. If a candidate is newly qualified, one of their references must come from their most recent education provider.

- 8.1.8 A policy on obtaining a satisfactory DBS disclosure and 'barred list' check for appropriate positions as a condition of employment at the College. The College will also source prohibition order checks where relevant.

## **8.2 Staff recruitment**

- 8.2.1 The College's procedures for recruiting staff pay due regard to safeguarding issues. The Human Resources department produces working procedures to ensure this.
- 8.2.2 All Governors and co-opted members to committees are also required to undergo enhanced DBS checks.
- 8.2.3 The Human Resources department will regularly review its recruitment procedures in the light of any change in advice concerning safeguarding issues that relates to the recruitment and selection process and ensure that the College is compliant in staff being trained in Safer Recruitment.
- 8.2.4 At least one person on any recruitment panel must have undertaken Safer Recruitment training.
- 8.2.5 In the case of contractors working on the site during term time, the duties of the College in relation to safeguarding will be made clear to those who would be supervising the work. Where building contractors' staff could come into contact with young people, arrangements will be made with the contractors, via the contract if possible, for appropriate checks to be made. Contractors and/or visitors for whom it is not applicable to make a full check will be accompanied by a member of staff at all times. For all contracted staff in regular contact with students there must be an awareness of this Policy. It will be a requirement of the College contract with a contractor that the contracted staff undertake regular and appropriate training, provided by that contractor.
- 8.2.6 An introduction to the College's safeguarding procedures will form part of the induction process for all new staff. All new staff, including temporary and agency staff, will be given a copy of this policy and of any appropriate guidance from the Safeguarding Partners. There is specific reference to the Prevent agenda as part of this training.
- 8.2.7 Refresher and updated training for all staff is arranged and determined by guidance or an identified need concerning a specific matter.
- 8.2.8 In line with Keeping Children Safe in Education (2023) Guidance, the College will conduct an online search which may include social media for all shortlisted candidates, as part of the interview process. The search will only include publicly available information using the candidate's name and any previous names used. The information will be entered into an internet search engine. Any information not related to suitability for the role will not be considered. Appropriate information found as part of the search will be considered by the interview panel, who may speak to the candidate about any findings during the

interview process. This information is used to determine a candidate's suitability to work with children as part of the KCSIE guidance (2023). Candidates will be informed that we undertake online searches as part of our recruitment process.

### 8.3 Whistle-blowing Policy

8.3.1 Where there are concerns about the way that safeguarding is carried out in the College, staff should refer to the Whistle-blowing Policy.

8.3.2 A whistleblowing disclosure must be about something that affects the general public such as:

- A criminal offence has been committed, is being committed or is likely to be committed
- A legal obligation has been breached
- There has been a miscarriage of justice
- The health or safety of any individual has been endangered
- The environment has been damaged
- Information about any of the above has been concealed

8.3.3 The NSPCC runs a whistleblowing helpline on behalf of the government; the number is 0808 800 5000.

8.3.4 Appendices to this policy outline procedure for reporting concerns and do not form part of the main Policy. These Appendices form part of internal versions only and include:

- The duty to report
- What to do if you notice abuse
- Types of abuse
- Sexual Violence and Sexual Harassment
- Dealing with a disclosure
- Confidentiality
- Risks posed by students
- The operation of the designated team

8.3.5 There is also additional information and guidance covering the following specific issues:

- Children who are lesbian, gay, bi, or trans (LGBTQ+)
- Safeguarding students susceptible to extremism and radicalisation
- Female Genital Mutilation and Forced Marriage (so-called Honour-based abuse)
- Upskirting

- Child criminal exploitation: County Lines
- Homelessness
- Children absent from education
- Child with family members in prison
- Children in the court system
- Cyber crime
- Child Sexual Exploitation
- Domestic abuse
- Children with special educational needs and disabilities
- Private fostering

**Member of staff responsible for this Policy: Associate Principal (Students and Welfare)**

**Date approved by Corporation:**

**September 2023**

**Date when this Policy and Procedures will be reviewed:**

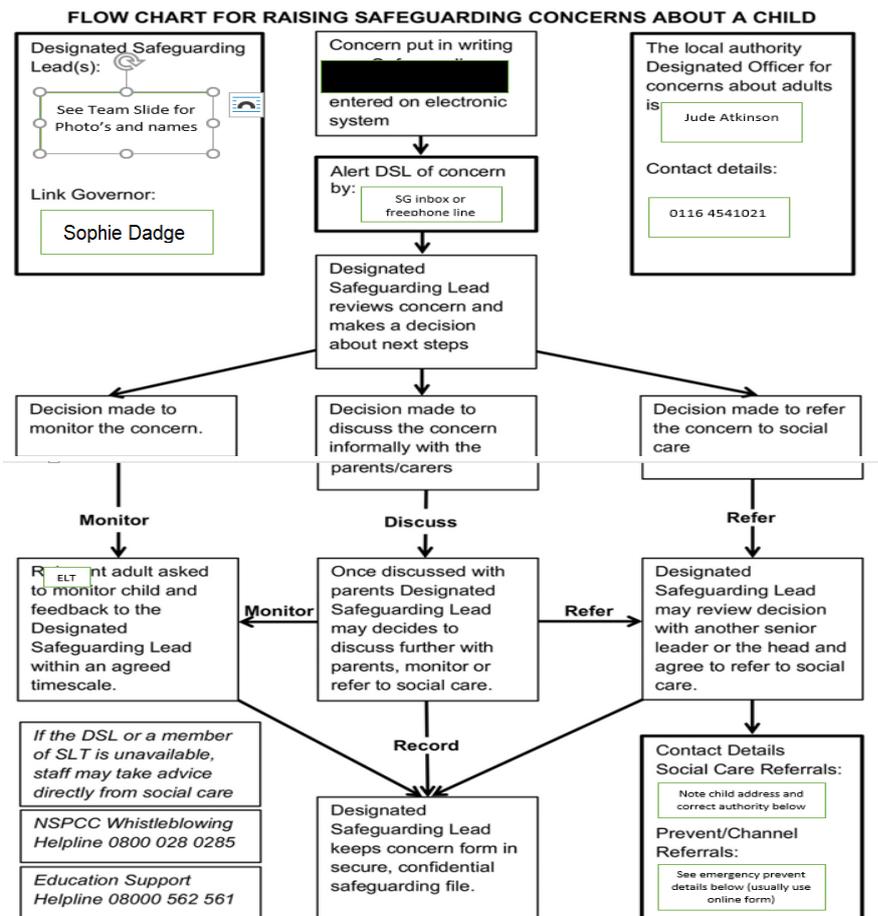
**September 2024**

**APPENDIX ONE**

**PROCEDURES FOR REPORTING CASES OF SUSPECTED ABUSE INVOLVING YOUNG PEOPLE**

**1. The duty to report**

The College and all its members of staff have a legal duty to report cases of suspected abuse. If you, as a member of staff, have concerns that a young person has been mistreated or abused, you **MUST** report this by emailing [safeguarding@wqe.ac.uk](mailto:safeguarding@wqe.ac.uk) or ringing the Freephone Safeguarding helpline 08000 614 2222. All serious concerns are reported to the DSL immediately by the Safeguarding Team. The Safeguarding inbox is managed and triaged by the Safeguarding Assistant constantly during college hours. The safeguarding freephone line is covered during all college opening hours using a team duty rota system, always ensuring an answer.



**Social Care Telephone Numbers**

Leicester City: 0116 2527004 including out of hours

Leicestershire: 0116 305 0005 including out of hours

Rutland: 01572 722 577 ext 8407 / out of hours 0116 305 0005

If the person is in immediate danger please ring 999.

#### Prevent Telephone Numbers

1. Email Leicestershire Police Prevent team or call 0116 248 6726.

2. Email the Leicester, Leicestershire and Rutland Prevent co-ordinator or call 0116 273 3459

## 2. What to do if you notice abuse

You may become aware of potential abuse in two main ways:

- You may observe signs in a student that lead you to suspect that they have been physically, emotionally or sexually abused, or suffer severe neglect, or are at risk of becoming radicalised.
- The students themselves may disclose to you that they have been abused.

The tables below give examples that may indicate that an individual is being/is at risk of being abused. In addition to these a person may be being abused by virtue of their race, gender, age, disability or sexual orientation which would indicate discriminatory abuse. Similarly, any of the examples listed may be an indication of institutional abuse if the individual is in receipt of organised care.

#### **Possible signs of physical abuse include:**

- Unexplained injuries or burns, particularly if they are recurrent
- Fear of medical help
- Refusal to discuss injuries
- Improbable explanations for injuries
- Untreated injuries or lingering illnesses not attended to
- Admission of punishment which appears excessive
- Unexplained pattern of absence which may serve to hide bruises or other physical injuries
- Aggression/bullying
- Over compliant behaviour or a 'watchful' attitude
- Running away
- Shrinking from physical contact
- Deterioration of work
- Significant change in behaviour without explanation
- Fear of undressing
- Fear of returning home or of parents/carers being contacted

**Physical abuse** may involve hitting, shaking, throwing, poisoning, burning or scalding,

drowning or otherwise causing physical harm. Physical injury may occur as a result of injury inflicted by a family member, or by another person, or an injury sustained accidentally but as a result of neglect. Physical harm may also be caused when a parent/carer feigns the symptoms of, or deliberately causes ill health to a young person whom they are looking after. Bullying can also be a form of physical and emotional abuse. However, it is more often between peers and will be dealt with through the College disciplinary procedures in line with the College Anti Bullying & Harassment Policy.

**Possible signs of emotional abuse include:**

- Continual self-depreciation
- Drug/solvent abuse
- Self-harm or mutilation
- 'Neurotic' behaviour – obsessive rocking, thumb-sucking and so on
- Compulsive stealing/scrounging
- Fear of new situations
- Air of detachment – 'don't care' attitude
- Inappropriate emotional responses to painful situations
- Social isolation – does not join in and has few friends
- Depression/withdrawal
- Desperate attention-seeking behaviour
- Eating problems, including overeating and lack of appetite

**Psychological/Emotional abuse** is the persistent emotional ill-treatment of a person such as to cause severe and persistent adverse effects on his or her emotional development. It may involve conveying to that child or person that they are worthless or unloved, inadequate or valued only in so far as they meet the needs of another person. It may feature age or developmentally inappropriate expectations being imposed on the young person. It may involve causing that young person to feel frightened or in danger, or exploitation or corruption. Emotional and other forms of abuse may occur as a result of domestic abuse (including witnessing). Some level of emotional abuse is involved in all types of ill-treatment or abuse, though it may occur alone.

**Possible signs of sexual abuse include:**

- Bruises, scratches, burns or bite marks on the body
- Promiscuity, prostitution, provocative sexual behaviour
- Scratches, abrasions or persistent infections in the anal or genital regions
- Self-injury, self-destructive behaviour, suicide attempts
- Sexual awareness inappropriate to the person's age - shown, for example, in drawings, vocabulary, games and so on
- Pregnancy, particularly in the case of young adolescents who are evasive concerning the identity of the father
- Frequent public masturbation
- Recoiling from physical contact
- Attempts to teach others about sexual activity
- Eating disorders
- Refusing to stay with certain people or to go to certain places
- Withdrawal from friends
- Aggressiveness, anger, anxiety, tearfulness
- Over-compliant behaviour
- Tiredness, lethargy, listlessness
- Genital discharge/irritation
- Sleep disturbance
- Unexplained gifts of money
- Depression
- Changes in behaviour

**Sexual abuse** involves forcing or enticing a young person to take part in sexual activities, whether or not they are aware of what is happening. The activities may involve physical contact, including penetrative or non-penetrative acts. They may include non-contact activity such as involving children or vulnerable adults in looking at, or in the production of, pornographic material or watching sexual activities, or encouraging them to behave in sexually inappropriate ways. Sexual abuse may also take place through the inappropriate use of cameras and phone images (Sexting).

**Possible signs of neglect include:**

- Constant hunger
- Low self-esteem
- Poor personal hygiene
- Poor social relationships
- Inappropriate clothing
- Compulsive stealing or scrounging
- Frequent lateness or non-attendance at College
- Constant tiredness
- Untreated medical problems

**Neglect** is the persistent failure to meet a young person's basic physical and/or psychological needs, likely to result in the serious impairment of his or her health or development. It may involve a parent/carer failing to provide adequate food, shelter and clothing, or the failure to ensure access to appropriate medical care or treatment. It may also involve the neglect of basic emotional needs.

**Children who are lesbian, gay, bi, or trans (LGBTQ+)**

The fact that a child or a young person may be LGBTQ+ is not in itself an inherent risk factor for harm. However, children who are LGBTQ+ can be targeted by other children. In some cases, a child who is perceived by other children to be LGBTQ+ (whether they are or not) can be just as vulnerable as children who identify as LGBTQ+. Risks can be compounded where children who are LGBTQ+ lack a trusted adult with whom they can be open. Our staff endeavour to reduce the additional barriers faced, and provide a safe space for them to speak out or share their concerns with members of staff. LGBTQ+ inclusion is part of the statutory Relationships Education, Relationship and Sex Education and Health Education curriculum and there is a range of support available to help students such as: student Assistance programme, Welfare and Skills drop in service and activity programme, dedicated equalities officer, regular staff training on equality, diversity and inclusion, onsite counselling and mentoring. Personal Progress Mentor sessions include extensive teaching and dialogue surrounding equality, diversity and inclusion, based around Statutory Relationships Education, Relationship and Sex Education and Health Education curriculum.

**Possible signs of radicalisation include:**

- The individual's views become increasingly extreme regarding another section of society or government policy
- They are observed downloading, viewing or sharing extremist propaganda from the web
- The individual becomes increasingly intolerant of more moderate views
- They become withdrawn and focused on one ideology
- The individual expresses a desire/intent to take part in or support extremist activity
- The individual may change their appearance, their health may suffer (including mental health) and they may become isolated from family, friends, peers or social groups

**In respect of safeguarding individuals from radicalisation**, the College works to the Prevent element of the Government's Counter Terrorism Strategy, and where deemed appropriate, and in conjunction with the Police, seeks external support for learners through referrals to the Channel programme. This programme aims to work with the individual to address their specific vulnerabilities, prevent them becoming further radicalised and possible entering the criminal justice system because of their actions. It is recognised that in many instances the process of radicalisation is essentially one of grooming by others. The College has a Prevent strategy, risk register and action plan to deal with this matter.

As part of the Counter Terrorism and Security Act 2015, colleges have a duty to 'prevent people being drawn into terrorism'. This has become known as the 'Prevent Duty'. Where staff are concerned that students are developing extremist views or show signs of becoming radicalised, they should discuss this with the Designated Safeguarding Lead.

The Designated Safeguarding Lead has received training about the Prevent Duty and tackling extremism and is able to support staff with any concerns they may have. We use the curriculum to ensure that students understand how people with extreme views share these with others, especially using the internet.

Staff should be alert to changes in student's behaviour, which could indicate that they may be in need of help or protection. Staff should use their judgement in identifying students who might be at risk of radicalisation and act proportionately which may include the designated safeguarding lead (or deputy) making a Prevent referral.

We are committed to ensuring that our students are offered a broad and balanced curriculum that aims to prepare them for life in modern Britain. Teaching the college's core values alongside the fundamental British Values supports quality teaching and learning, whilst making a positive contribution to the development of a fair, just and civil society.

### **3a. Sexual Violence and Sexual Harassment/Child-on-child abuse**

Guidance from the government recognises that sexual violence and sexual harassment can occur between two children of any age and gender. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. It can occur online as well as offline and it's important that all victims are taken seriously and

offered appropriate support. Some groups are potentially more at risk and evidence shows that this includes girls, children with SEND and LGBTQ++ children. It should never be tolerated or dismissed as “banter”, “part of growing up”, “just having a laugh” or “boys being boys” and must always be reported to the lead DSL who will use the guidance to manage the situation.

The language used above points to the growing concern amongst younger age College students. For WQE this translates to child-on-child abuse and is monitored and dealt with under harassment/bullying. We also recognise that our students can be a victim of sexual violence and harassment where a perpetrator is an adult and our staff training supports staff in following our reporting procedure.

Staff should be aware that safeguarding issues can manifest themselves via child-on-child abuse. This is most likely to include, but not limited to:

- bullying (including cyberbullying, prejudice-based and discriminatory bullying);
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm;
- sexual violence and sexual harassment;
- gender-based violence
- sexting (also known as youth produced sexual imagery); and
- initiation-type violence and rituals.
- Abuse in intimate personal relationships between peers
- Causing someone to engage in sexual activity without their consent (for example, forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party)

Abuse is abuse and should never be tolerated or passed off as “banter” or “part of growing up”. Different gender issues can be prevalent when dealing with child-on-child abuse. This could for example include girls being sexually touched/assaulted or boys being subject to initiation-type violence.

At WQE we believe that all children have a right to attend college and learn in a safe environment. Therefore, our students should be free from harm by adults in the college and other students.

We recognise that some students will sometimes negatively affect the learning and wellbeing of others and their behaviour will be dealt with under the college’s Student Guidance and Intervention Policy.

Occasionally, Allegations may be made against students by others in the college, which are of a safeguarding nature. Safeguarding issues raised in this way may include physical abuse, emotional abuse, sexual abuse and sexual exploitation. It is likely that to be considered a safeguarding allegation against a student, some of the following features will be found within the allegation:

- is made against an older student and refers to their behaviour towards a younger pupil or a more vulnerable student
- is of a serious nature, possibly including a criminal offence
- raises risk factors for other students in the college
- indicates that other students may have been affected by this student
- indicates that young people outside the college may be affected by this student

### **Sexting**

In cases of 'sexting' we follow guidance given to colleges and colleges by the UK Council for Child Internet Safety (UKCCIS) published in 2017: 'Sexting in colleges and colleges, responding to incidents, and safeguarding young people'.

### **Sharing of nudes and semi-nudes ('sexting')**

This is a suggested approach based on [guidance from the UK Council for Internet Safety](#) for [all staff](#) and for [DSLs and senior leaders](#).

### **Your responsibilities when responding to an incident**

If you are made aware of an incident involving the consensual or non-consensual sharing of nude or semi-nude images/videos (also known as 'sexting' or 'youth produced sexual imagery'), you must report it to the DSL immediately.

You must **not**:

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

You should explain that you need to report the incident and reassure the pupil(s) that they will receive support and help from the safeguarding team.

### **Initial review meeting**

Following a report of an incident, the DSL (or an appointed safeguarding team member) will hold an initial review meeting with appropriate college staff – this may include the staff member who reported the incident and the safeguarding or leadership team that deals with safeguarding concerns. This meeting will consider the initial evidence and aim to determine:

- Whether there is an immediate risk to pupil(s)
- If a referral needs to be made to the police and/or children's social care

- If it is necessary to view the image(s) in order to safeguard the young person (in most cases, images or videos should not be viewed)
- What further information is required to decide on the best response
- Whether the image(s) has been shared widely and via what services and/or platforms (this may be unknown)
- Whether immediate action should be taken to delete or remove images or videos from devices or online services
- Any relevant facts about the pupils involved which would influence risk assessment
- If there is a need to contact another college, college, setting or individual
- Whether to contact parents or carers of the pupils involved (in most cases parents/carers should be involved)

The DSL (or appointed safeguarding team member) will make an immediate referral to police and/or children's social care if:

- The incident involves an adult
- There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example owing to special educational needs)
- What the DSL knows about the images or videos suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent
- The imagery involves sexual acts and any pupil in the images or videos is under 13
- The DSL has reason to believe a pupil is at immediate risk of harm owing to the sharing of nudes and semi-nudes (for example, the young person is presenting as suicidal or self-harming)

If none of the above apply then the DSL, safeguarding team and other members of staff as appropriate, may decide to respond to the incident without involving the police or children's social care. The decision will be made and recorded in line with the procedures set out in this policy.

### **Further review by the DSL**

If at the initial review stage a decision has been made not to refer to police and/or children's social care, the DSL (or appointed safeguarding team member) will conduct a further review to establish the facts and assess the risks.

They will hold interviews with the pupils involved (if appropriate).

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

### **Informing parents/carers**

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

### **Referring to the police**

If it is necessary to refer an incident to the police, this will be done by dialling 101 or the most appropriate method at time.

### **Recording incidents**

All incidents of sharing of nudes and semi-nudes, and the decisions made in responding to them, will be recorded in Cpoms. The record-keeping arrangements set out in section 14 of this policy also apply to recording these incidents.

### **3b. Female Genital Mutilation, forced marriage (So called honour-based abuse)**

So-called 'honour-based' abuse (HBA) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing. Abuse committed in the context of preserving "honour" often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take. All forms of HBA are abuse (regardless of the motivation) and should be handled and escalated as such. 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 HBA.

The College will embed the guidance in the resource pack supporting Government's Tackling Violence Against Women and Girls Strategy (VAWG), published in July 2021. The Marriage and Civil Partnership (Minimum Age) Act 2022; raised the legal age of marriage and civil partnerships in England and Wales to 18 years old. Under the new law it is an offence to cause a child under the age of 18 to enter a marriage (including religious ceremonies, and those not legally binding in the UK) in any circumstances, without the need to prove that coercion was used. All staff are trained to spot the signs of forced marriage or marriage under 18 years of age and report to appropriate channels above.

The Safeguarding team will use The Forced Marriage Unit (FMU): Multi-agency practice guidelines: handling cases of forced marriage (pages 75-80 of which focus on the role of schools and colleges) and, Multi-agency statutory guidance for dealing with forced marriage, The right to choose: government guidance on forced marriage - GOV.UK ([www.gov.uk](http://www.gov.uk)). The safeguarding team will seek advice from the Forced Marriage Unit if required: Contact: 020 7008 0151 or email [fmufcdo.gov.uk](mailto:fmufcdo.gov.uk).

### **FGM**

FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences.

### **FGM mandatory reporting duty for teachers**

Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a statutory duty upon **teachers** along with regulated health and social care professionals in England and Wales, to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Those failing to report such cases will face disciplinary sanctions. It will be rare for teachers to see visual evidence, and they should **not** be examining students or students.

If staff have a concern regarding a child that might be at risk of HBA or who has suffered from HBA, they should speak to the designated safeguarding lead (or deputy). As appropriate, they will activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and children's social care.

### **3c. Upskirting**

First published in KCSIE 2019 - Upskirting is a highly intrusive practice, which is typically when a photograph is taken under a person's clothing without them knowing, for sexual gratification or to cause the victim humiliation, distress or alarm – report to safeguarding team immediately.

### **3d. Child Criminal Exploitation**

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

The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact; it can also occur through the use of technology.

Some of the following can be indicators of CCE:

- children who appear with unexplained gifts or new possessions;
- children who associate with other young people involved in exploitation;
- children who suffer from changes in emotional well-being;
- children who misuse drugs and alcohol;
- children who go missing for periods of time or regularly come home late; and
- children who regularly miss college or education or do not take part in education.

Risk factors that increase the likelihood of involvement in serious violence:

- Being male
- Being frequently absent or permanently excluded from college

- Having experienced child maltreatment
- Having been involved in offending such as theft or robbery

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

**‘County Lines’ is:**

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

Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to move [and store] drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims.

Children can easily become trapped by this type of exploitation as county lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

**The Home Office defines county lines as:**

‘Urban gangs supplying drugs to suburban areas and market and coastal towns using dedicated mobile phone lines or “deal lines”. It involves child criminal exploitation (CCE) as gangs use children and vulnerable people to move drugs and money. Gangs establish a base in the market location, typically by taking over the homes of local vulnerable adults by force or coercion in a practice referred to as “cuckooing”.’

Staff are trained in recognising the signs of County Lines involvement and refer to DSL immediately following our reporting process.

**3e. Homelessness**

Being homeless or being at risk of becoming homeless presents a real risk to a child’s welfare. The designated safeguarding lead (and deputies) should be aware of contact details and referral routes in to the Local Housing Authority so they can raise/progress concerns at the earliest opportunity. Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property. Whilst referrals and/or discussion with the Local Housing Authority should be progressed as appropriate, and in accordance with local procedures, this does not, and should not, replace a referral into children’s social care where a child has been harmed or is at risk of harm.

The Homelessness Reduction Act 2017 places a new legal duty on English councils so that everyone who is homeless or at risk of homelessness will have access to meaningful help including an assessment of their needs and circumstances, the development of a personalised housing plan, and work to help them retain their accommodation or find a new place to live. The new duties shift focus to early intervention and encourage those at risk to seek support as soon as possible, before they are facing a homelessness crisis.

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

### **3f. Children absent from education**

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 female genital mutilation or risk of forced marriage. Early intervention is necessary to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child going missing in future. Staff are aware of our College unauthorised absence and students absent from education procedures.

Knowing where students are during college hours is an extremely important aspect of Safeguarding. Missing college can be an indicator of abuse and neglect and may also raise concerns about others safeguarding issues, including the criminal exploitation of children.

We monitor attendance carefully and address poor or irregular attendance without delay. We will always follow up with parents/carers when students are not at college. This means we need to have a least two up to date contacts numbers for parents/carers. Parents should remember to update the college as soon as possible if the numbers change.

In response to the guidance in Keeping Children Safe in Education (2023) the College has:

1. Staff who understand what to do when students do not attend regularly
2. Appropriate policies, procedures and responses for students who are absent from education (especially on repeat occasions).
3. Staff who know the signs and triggers for travelling to conflict zones, FGM and forced marriage.

4. Procedures to inform the local authority when we plan to take students off-roll when they:
  - a. leave college to be home educated
  - b. move away from the college's location
  - c. remain medically unfit beyond compulsory college age
  - d. are in custody for four months or more (and will not return to college afterwards); or
  - e. are permanently excluded

We will ensure that students who are expected to attend the college, but fail to take up the place will be contacted to ensure they have an alternative placement in Education or training.

When a student leaves the college, we will record the name of the student's new college and their expected start date. We complete a leavers form recording this information.

### **3g. Children with family members in prison**

Approximately 200,000 children in England and Wales 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. Information is provided by the DSL and safeguarding team on a need to know basis, always maintaining strict confidentiality principals upheld by the College. Where information is shared with wider staff it will be approved by the student (where at all possible) in question and for a specific goal to be achieved e.g. increased support.

### **3h. Children in the court system**

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.

The guides explain each step of the process, 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. The College will support the criminal justice system by proving our students with the appropriate support if they are involved in the court system. A strategy will be compiled by the safeguarding team and shared with key staff as appropriate for support purposes.

### 3i. Cyber Crime

Cyber crime is an 'umbrella' term for lots of different types of crimes which either take place online or where technology is a means and/or target for the attack. It is one of the fastest growing criminal activities across the world, and can affect both individuals and businesses.

Cyber crimes can affect people in different ways, and in most cases victims will feel worried and scared by what has happened. For this reason cyber crimes are treated as 'real world' crimes and are prosecuted as such.

Many cyber crimes could have been prevented by making a few small changes in online behaviour. We have a duty of care to ensure that our students are neither victims or perpetrators of cyber crime through education and preventative measures. The DSL (or deputies) should attend regular Police briefings to obtain most up to date information and brief staff at regular intervals using safeguarding briefings. Students causing concern in regards to online behaviour will be referred to EMSOU Cyber Prevent Unit – Leicestershire. Where support and guidance will be received.

The College has a responsibility through the DSL to obtain appropriate educational resourcing from the Cyber Prevent Unit to education students regarding appropriate online behaviour.

The College will maintain an internet and email filtering system and any causes for concern will be reported directly to the safeguarding team.

The College also has a responsibility to reasonable education parents, best placing them to safeguard their children when using ICT in a home environment.

The College staff are aware that:

- Technology is a significant component in many safeguarding issues
- Abuse can happen online, offline, or both
- Children can also abuse their peers online. This can include:
  - Abusive, harassing or misogynistic messages
  - Non-consensual sharing of indecent images (particularly in chat groups)
  - Sharing of abusive images and pornography to those who don't want to receive such content

#### **The 4 key categories of risk**

Our approach to online safety is based on addressing the following categories of risk:

- **Content** – being exposed to illegal, inappropriate or harmful content, such as pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism
- **Contact** – being subjected to harmful online interaction with other users, such as peer-to-peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes

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

**To meet our aims and address the risks above we will:**

- Educate pupils about online safety as part of our curriculum. For example:
  - The safe use of social media, the internet and technology
  - Keeping personal information private
  - How to recognise unacceptable behaviour online
  - How to report any incidents of cyber-bullying, ensuring pupils are encouraged to do so, including where they are a witness rather than a victim
- Train staff, as part of their induction, on safe internet use and online safeguarding issues including cyber-bullying and the risks of online radicalisation. All staff members will receive refresher training at least once each academic year
- Educate parents/carers about online safety via our website, communications sent directly to them and during parents' evenings. We will also share clear procedures with them so they know how to raise concerns about online safety
- Make sure staff are aware of any restrictions placed on them with regards to the use of their mobile phone and cameras, for example that:
  - Staff are allowed to bring their personal phones to college for their own use, but will limit such use to non-contact time when students are not present
  - Staff will not take pictures or recordings of students on their personal phones or cameras
- Make all students, parents/carers, staff, volunteers and governors aware that they are expected to sign an agreement regarding the acceptable use of the internet in college, use of the college's ICT systems and use of their mobile and smart technology
- Explain the sanctions we will use if a student is in breach of our policies on the acceptable use of the internet and mobile phones
- Make sure all staff, students and parents/carers are aware that staff have the power to search pupils' phones, as set out in the [DfE's guidance on searching, screening and confiscation](#)
- Put in place robust filtering and monitoring systems to limit student's exposure to the 4 key categories of risk (described above) from the college's IT systems
- Carry out an annual review of our approach to online safety, supported by an annual risk assessment that considers and reflects the risks faced by our college community.

**3j. Child Sexual exploitation (CSE)**

CSE occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. CSE does not always involve physical contact; it can also occur through the use of technology. CSE can affect any child or young person (male or female) under the age of 18 years, including 16 and 17 year olds who can legally consent to have sex. It can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity and may occur without the child or young person's immediate knowledge (e.g. through others copying videos or images they have created and posted on social media).

The above CCE indicators can also be indicators of CSE, as can:

- children who have older boyfriends or girlfriends; and
- children who suffer from sexually transmitted infections or become pregnant.

The statutory definition of Child Sexual Exploitation (CSE) can be found in the guidance document *Child sexual exploitation: Definition and a guide for practitioners* (DfE 2017).

The definition, which can be found on KCSIE, is:

Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology.

Indicators of child sexual exploitation may include:

- Acquisition of money, clothes, mobile phones, etc. without plausible explanation;
- Gang-association and/or isolation from peers/social networks;
- Exclusion or unexplained absences from college, college or work;
- Leaving home/care without explanation and persistently going missing or returning late;
- Excessive receipt of texts/phone calls;
- Returning home under the influence of drugs/alcohol;
- Inappropriate sexualised behaviour for age/sexually transmitted infections;
- Evidence of/suspicions of physical or sexual assault;
- Relationships with controlling or significantly older individuals or groups;
- Multiple callers (unknown adults or peers);
- Frequenting areas known for sex work;
- Concerning use of internet or other social media;
- Increasing secretiveness around behaviours; and
- Self-harm or significant changes in emotional well-being.

Potential vulnerabilities include:

Although the following vulnerabilities increase the risk of child sexual exploitation, it must be remembered that not all children with these indicators will be exploited. Child sexual exploitation can occur without any of these issues.

- Having a prior experience of neglect, physical and/or sexual abuse;
- Lack of a safe/stable home environment, now or in the past (domestic abuse or parental substance misuse, mental health issues or criminality, for example);
- Recent bereavement or loss;
- Social isolation or social difficulties;
- Absence of a safe environment to explore sexuality;
- Economic vulnerability;
- Homelessness or insecure accommodation status;
- Connections with other children and young people who are being sexually exploited;
- Family members or other connections involved in adult sex work;
- Having a physical or learning disability;
- Being in care (particularly those in residential care and those with interrupted care histories); and
- Sexual identity.

### **3k. The definition of domestic abuse is:**

any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass but is not limited to psychological; physical; sexual; financial; and emotional.

All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Exposure to domestic abuse and/or violence can have a serious, long lasting emotional, physical and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

**3l. Children and young people with special educational needs and disabilities** can face additional safeguarding challenges because:

- there may be assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration;
- children with SEN and disabilities can be disproportionately impacted by things like bullying without outwardly showing any signs; and
- difficulties may arise in overcoming communication barriers.

At WQE we identify students who might need more support to be kept safe or to keep themselves safe by ensuring a central record is held of their needs within Welfare and Skills,

ensuring their needs can be met, even though staffing may change. We ensure all information regarding student needs are shared with staff required, using the college student information system, currently ProMonitor.

**3m. A private fostering arrangement** is one that is made privately (without the involvement of a local authority) for the care of a child under the age of 16 years (under 18, if disabled) by someone other than a parent or close relative, in their own home, with the intention that it should last for 28 days or more.

A close family relative is defined as a 'grandparent, brother, sister, uncle or aunt' and includes half-siblings and step-parents; it does not include great-aunts or uncles, great grandparents or cousins.

Parents and private foster carers both have a legal duty to inform the relevant local authority at least six weeks before the arrangement is due to start; not to do so is a criminal offence.

Whilst most privately fostered children are appropriately supported and looked after, they are a potentially vulnerable group who should be monitored by the local authority, particularly when the child has come from another country. In some cases, privately fostered children are affected by abuse and neglect, or be involved in trafficking, child sexual exploitation or modern-day slavery.

Colleges have a mandatory duty to report to the local authority where they are aware or suspect that a child is subject to a private fostering arrangement. Although colleges have a duty to inform the local authority, there is no duty for anyone, including the private foster carer or social workers to inform the college. However, it should be clear to the college who has parental responsibility.

College staff should notify the designated safeguarding lead or a Safeguarding Team member when they become aware of private fostering arrangements. The designated safeguarding lead or the LAC lead will speak to the family of the child involved to check that they are aware of their duty to inform the LA. The college itself has a duty to inform the local authority of the private fostering arrangements.

On admission to the college, we will take steps to verify the relationship of the adults to the child who is being registered.

**3n. Child abduction** and community safety incidents:

- Child abduction is when children are taken from their parents or carers without permission. It can be committed by parents or other family members, by people known but not related to the child (like neighbours, friends and acquaintances), and by strangers
- Community safety incidents are things like unknown adults loitering near college or trying to talk to children – all staff members have a responsibility to report this to the Safeguarding Team
- Always follow our pick-up procedures to make sure students only go home with their appropriate adult(s) where there has been a safeguarding concern or vulnerability identified

- **If you see anything suspicious or that doesn't feel right, report it immediately**

### **3o. Modern slavery:**

- This includes human trafficking and slavery, servitude and forced or compulsory labour
- The exploitation can take many forms, for example sexual exploitation, forced labour, forced criminality and the removal of organs
- There's a national referral mechanism for modern slavery – [Report modern slavery as a first responder - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/report-modern-slavery-as-a-first-responder)

### **3p. Students with a social worker**

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

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

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

- Responding to unauthorised absence or missing education where there are known safeguarding risks
- The provision of pastoral and/or academic support

### **3q. Looked-after and previously looked-after children**

We will ensure that staff have the skills, knowledge and understanding to keep looked-after children and previously looked-after children safe. In particular, we will ensure that:

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

We have appointed a designated staff member who is responsible for promoting the educational achievement of looked-after children and previously looked-after children in line with [statutory guidance](#).

The designated teacher is appropriately trained and has the relevant qualifications and experience to perform the role.

As part of their role, the designated teacher will:

- Work closely with the DSL or safeguarding team to ensure that any safeguarding concerns regarding looked-after and previously looked-after children are quickly and effectively responded to
- Work with virtual college heads to promote the educational achievement of looked-after and previously looked-after children, including discussing how pupil premium

plus funding can be best used to support looked-after children and meet the needs identified in their personal education plans

#### 4. Dealing with a disclosure

- Any disclosure by a student should be listened to seriously and sensitively, without casting doubt on what is being said, but without asking leading questions.
- The student should be made aware of subsequent steps that will be taken and why they are necessary.
- The safeguarding team should be informed as soon as possible about the disclosure, unless it involves an allegation about a member of staff.
- The Principal should be informed as soon as possible about any allegation about a member of staff, including governors, volunteers, supply teachers and agency staff. If the allegation is against the Principal, then the Clerk to the Corporation should be informed in order to bring this to the attention of the Chair of the Corporation; in the absence of the Clerk, the Chair should be contacted directly. Any such allegations will be dealt with under the staff disciplinary procedures, taking into account advice from appropriate agencies. The designated governor will be contacted as soon as possible after the matter has been raised with the Principal or Clerk.
- In the case of an allegation against a member of the Corporation, the Clerk should be informed in order to bring this to the attention of the Chair of the Corporation; in the absence of the Clerk, the Chair should be contacted directly. Should the allegation be against the Chair, then the Clerk should inform the Vice-Chair of the Corporation
- The guidance in KCSIE should be followed where it is alleged that anyone working in a college that provides education for children under 18 years of age, including supply teachers and volunteers has:
  - behaved in a way that has harmed a child, or may have harmed a child;
  - possibly committed a criminal offence against or related to a child;
  - behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children; or
  - behaved or may have behaved in a way that indicates they may not be suitable to work with children.
- It is very important to record, as accurately as possible, what was said to you when you received the disclosure of abuse. Clearly all written records should be handled confidentially. If a young person discloses to you that they or another young person has been abused/radicalised, or is at risk of this, if you suspect from what you are told that they are being abused, you **MUST REPORT THIS**.

There is a designated team of safeguarding staff whose role it is to deal with cases of suspected abuse. **You must inform any one of these staff immediately if you have concerns that a young person has been, is, or is at risk of being abused/radicalised.** They should be informed in person, or by telephone or by email.

There are three routes to refer concerns about abuse:

- I. Contact a member of the College Designated Safeguarding Team directly. The staff roles in this team are:
  - Associate Principal (Students and Welfare) - DSL
  - Safeguarding Director – Deputy DSL
  - Head of Welfare and Skills
  - Deputy Head of Welfare and Skills
  - Student Wellbeing Manager
  - Heads of Studies
  - Welfare Lead Advisor
  - Communication and Equalities Officer
  - Designated Mental Health Lead
  - Wellbeing Advisor
- II. If the disclosure/concern involves a member of College staff, contact the Principal or the Associate Principal (Students and Welfare).
- III. If, for any reason, you are unable to contact a member of the designated team (for example in the evening) and the matter is urgent, then contact the Local Authority or the Police directly and report the matter to the Associate Principal (Students and Welfare) at next available opportunity.

**In all cases, if you are concerned, the rule is to pass this on quickly** and to seek help and further support, rather than to worry alone or to do nothing.

## **5. Confidentiality**

- Promises of confidentiality must not be given to the young person making a disclosure; there is a duty to refer.
- Referral to the appropriate person should be made with the knowledge of the student. If possible, it should be done with the consent of the student.
- Following an internal referral, unless an immediate referral to social care or the Police is warranted, a safeguarding team member will meet the student and discuss whether any of the information given should be made available to the student's teachers/PPM; any information so released should not be discussed with other members of staff. The confidentiality agreement will form part of the case notes.
- The College would seek to protect and would offer appropriate support during or after any investigation to, any student or member of staff who, in good faith, reported an allegation.

## **6. Risks posed by students**

- The College aims to be a civilised learning community, in which students treat others with respect and courtesy. Acceptable standards of behaviour are outlined in information issued to students before the acceptance of any offer and during induction and are also available on WQE Online. Students who have committed acts of bullying or harassment will be dealt with under the Student Guidance and Intervention Policy. In serious cases exclusion will be considered. It is possible that some instances may have safeguarding implications, in which case advice would be sought from the appropriate agency.
- Should the College become aware that a student has been charged with a sexual offence or one of violent behaviour, or any other criminal offence committed within or outside College, any risks posed to other students will be assessed, taking advice from outside agencies involved. This will involve inviting the student to a Risk Assessment interview. Where possible, subject to there being no significant risk to other students at the College, steps will be taken that will allow the student to continue their studies, albeit with some restriction(s) on the activities that they can undertake.
- Risk Assessment aims to be equitable to all applicants, and to meet the legal obligations of the Rehabilitation of Offenders Act 1974 (as amended) 2013; the Data Protection Act 2018; and the Human Rights Act 1998. Risk Assessment sits within the College's Safeguarding framework and works to ensure students, staff and visitors are protected from potential harm. Applicants/Students' are required to declare if they have any "unspent" convictions, including any pending matters, if under investigation. Under the Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975 (as amended 2013), there are a number of posts, activities and occupations which are exempt from the Rehabilitation of Offenders Act 1974. If a student applies or is enrolled on a course where a work placement with young/vulnerable people is included, they are required to declare both "spent" and "unspent" cautions and convictions – other than "protected" cautions and convictions which have qualified for filtering. If there is any uncertainty whether a conviction is "spent", or whether the convictions are "protected", students are advised to contact the Risk Assessment Team on 0116 224 2225.
- Information on the Risk Assessment form will not necessarily prevent students from studying at the College; however, unspent convictions that are not disclosed may result in a place being refused, removal from a course or a loss of the student's place at College entirely.
- Should the College become aware that a student is at risk of radicalisation/radicalising others this will be dealt with as with any other safeguarding issue although referral will be through the Channel - Police.

## **7. The operation of the designated team**

When a member of staff refers a case of suspected abuse to a member of the safeguarding team, they decide which course of action is more appropriate. In coming to a decision about

what action to take, the member of the safeguarding team will confer with the DSL. They may also take advice from contacts in the Local Authority. If they consider that abuse may have taken place, or that a young person is at risk of abuse, they will, in discussion with the DSL, formally notify the Local Authority or Police about this.

At this point the Local Authority/Police take over responsibility for the issue. If the referral is to the Local Authority and they decide that there are serious concerns, they will initiate a formal assessment and, where circumstances warrant it, involve the Police.

Involvement in cases of suspected abuse can be personally disturbing and distressing. Although the individuals involved in taking the disclosure may feel a need to talk about it with someone – a colleague, a friend, a partner – they should avoid this in order to respect the confidentiality of the student concerned.

Disclosure of or being the subject of abuse is obviously a very difficult and distressing time for the student, who needs to be offered continuing support in the College. They should be made aware of the support available to them (the College counselling service for example) and helped to initiate contact with this support if so desired.

A confidential record will be kept of all cases referred, including details of cases referred to the Local Authority, the Police or other agencies. These written records will be kept securely via restricted access on Cpoms and any paper information held securely.

The Associate Principal (Students and Welfare) will be informed where a case has arisen which has been referred to the Local Authority and/or the Police.

We also commit to offering the staff involved in any disclosure referral to the appropriate counselling service, we appreciate the difficulties for staff in dealing with such confidential and delicate situations. We are members of the Health Assured Employee Assistance programme, which offers staff 24-hour support via a free helpline.

## **8. Complaints and concerns about college safeguarding policies**

### **Complaints against staff**

Complaints against staff that are likely to require a child protection investigation will be handled in accordance with our procedures for dealing with allegations of abuse made against staff.

### **Other complaints**

Should be submitted in line with the College Complaints Policy

## **9. Appendix 3: allegations of abuse made against staff**

### **Section 1: allegations that may meet the harms threshold**

This section is based on 'Section 1: Allegations that may meet the harms threshold' in part 4 of Keeping Children Safe in Education.

This section applies to all cases in which it is alleged that a current member of staff, including a supply teacher, volunteer or contractor, has:

- Behaved in a way that has harmed a child, or may have harmed a child, and/or
- Possibly committed a criminal offence against or related to a child, and/or
- Behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children, and/or
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children – this includes behaviour taking place both inside and outside of college

We will deal with any allegation of abuse quickly, in a fair and consistent way that provides effective child protection while also supporting the individual who is the subject of the allegation.

A 'case manager' will lead any investigation. This will be the Principal, or the chair of governors where the Principal is the subject of the allegation. The case manager will be identified at the earliest opportunity.

Our procedures for dealing with allegations will be applied with common sense and judgement.

### **Suspension of the accused until the case is resolved**

Suspension of the accused will not be the default position and will only be considered in cases where there is reason to suspect that a child or other children is/are at risk of harm, or the case is so serious that there might be grounds for dismissal. In such cases, we will only suspend an individual if we have considered all other options available and there is no reasonable alternative.

Based on an assessment of risk, we will consider alternatives such as:

- Redeployment within the college so that the individual does not have direct contact with the child or children concerned
- Providing an assistant to be present when the individual has contact with children
- Redeploying the individual to alternative work in the college so that they do not have unsupervised access to children
- Moving the child or children to classes where they will not come into contact with the individual, making it clear that this is not a punishment and parents/carers have been consulted
- Temporarily redeploying the individual to another role in a different location

If in doubt, the case manager will seek views from the college's personnel adviser and the designated officer at the local authority, as well as the police and children's social care where they have been involved.

### Definitions for outcomes of allegation investigations

- **Substantiated:** there is sufficient evidence to prove the allegation
- **Malicious:** there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive, or to cause harm to the subject of the allegation
- **False:** there is sufficient evidence to disprove the allegation
- **Unsubstantiated:** there is insufficient evidence to either prove or disprove the allegation (this does not imply guilt or innocence)
- **Unfounded:** to reflect cases where there is no evidence or proper basis which supports the allegation being made

### Procedure for dealing with allegations

In the event of an allegation that meets the criteria above, the case manager will take the following steps:

- Conduct basic enquiries in line with local procedures to establish the facts to help determine whether there is any foundation to the allegation before carrying on with the steps below
- Discuss the allegation with the designated officer at the local authority. This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or children's social care services. (The case manager may, on occasion, consider it necessary to involve the police *before* consulting the designated officer – for example, if the accused individual is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. In such cases, the case manager will notify the designated officer as soon as practicably possible after contacting the police)
- Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the designated officer (and the police or children's social care services, where necessary). Where the police and/or children's social care services are involved, the case manager will only share such information with the individual as has been agreed with those agencies
- Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with children at the college is justified or whether alternative arrangements such as those outlined above can be put in place. Advice will be sought from the designated officer, police and/or children's social care services, as appropriate
- Where the case manager is concerned about the welfare of other children in the community or the individual's family, they will discuss these concerns with the DSL and make a risk assessment of the situation. If necessary, the DSL may make a referral to children's social care
- **If immediate suspension is considered necessary**, agree and record the rationale for this with the designated officer. The record will include information

about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at the college and their contact details

- **If it is decided that no further action is to be taken** in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the designated officer what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation
- **If it is decided that further action is needed**, take steps as agreed with the designated officer to initiate the appropriate action in college and/or liaise with the police and/or children's social care services as appropriate
- Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and considering what other support is appropriate. All employees will have access to the Employee Assistance Programme (EAP) for 24/7 support and advice.
- Inform the parents or carers of the child/children involved about the allegation as soon as possible if they do not already know (following agreement with children's social care services and/or the police, if applicable). The case manager will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against teachers (where this applies) while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice
- Keep the parents or carers of the child/children involved informed of the progress of the case (only in relation to their child – no information will be shared regarding the staff member)
- Make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child

If the college is made aware that the secretary of state has made an interim prohibition order in respect of an individual, we will immediately suspend that individual from teaching, pending the findings of the investigation by the Teaching Regulation Agency.

Where the police are involved, wherever possible the college will ask the police at the start of the investigation to obtain consent from the individuals involved to share their statements and evidence for use in the college's disciplinary process, should this be required at a later point.

### **Additional considerations for supply teachers and all contracted staff**

If there are concerns or an allegation is made against someone not directly employed by the college, such as a supply teacher or contracted staff member provided by an agency, we will take the actions below in addition to our standard procedures.

- We will not decide to stop using an individual due to safeguarding concerns without finding out the facts and liaising with our LADO to determine a suitable outcome

- The governing board will discuss with the agency whether it is appropriate to suspend the individual, or redeploy them to another part of the college, while the college carries out the investigation
- We will involve the agency fully, but the college will take the lead in collecting the necessary information and providing it to the LADO as required
- We will address issues such as information sharing, to ensure any previous concerns or allegations known to the agency are taken into account (we will do this, for example, as part of the allegations management meeting or by liaising directly with the agency where necessary)

When using an agency, we will inform them of our process for managing allegations, and keep them updated about our policies as necessary, and will invite the agency's HR manager or equivalent to meetings as appropriate.

### **Timescales**

We aim to deal with all allegations as quickly and effectively as possible and will endeavour to comply with the following timescales, where reasonably practicable:

- Any cases where it is clear immediately that the allegation is unsubstantiated or malicious should be resolved within 1 week
- If the nature of an allegation does not require formal disciplinary action, appropriate action should be taken within 3 working days
- If a disciplinary hearing is required and can be held without further investigation, this should be held within 15 working days

However, these are objectives only and where they are not met, we will endeavour to take the required action as soon as possible thereafter.

### **Specific actions**

#### **Action following a criminal investigation or prosecution**

The case manager will discuss with the local authority's designated officer whether any further action, including disciplinary action, is appropriate and, if so, how to proceed, taking into account information provided by the police and/or children's social care services.

#### **Conclusion of a case where the allegation is substantiated**

If the allegation is substantiated and the individual is dismissed or the college ceases to use their services, or the individual resigns or otherwise ceases to provide their services, the college will make a referral to the DBS for consideration of whether inclusion on the barred lists is required.

If the individual concerned is a member of teaching staff, the college will consider whether to refer the matter to the Teaching Regulation Agency to consider prohibiting the individual from teaching.

#### **Individuals returning to work after suspension**

If it is decided on the conclusion of a case that an individual who has been suspended can return to work, the case manager will consider how best to facilitate this.

The case manager will also consider how best to manage the individual's contact with the child or children who made the allegation, if they are still attending the college.

### **Unsubstantiated, unfounded, false or malicious reports**

If a report is:

- Determined to be unsubstantiated, unfounded, false or malicious, the DSL will consider the appropriate next steps. If they consider that the child and/or person who made the allegation is in need of help, or the allegation may have been a cry for help, a referral to children's social care may be appropriate
- Shown to be deliberately invented, or malicious, the college will consider whether any disciplinary action is appropriate against the individual(s) who made it

### **Unsubstantiated, unfounded, false or malicious allegations**

If an allegation is:

- Determined to be unsubstantiated, unfounded, false or malicious, the LADO and case manager will consider the appropriate next steps. If they consider that the child and/or person who made the allegation is in need of help, or the allegation may have been a cry for help, a referral to children's social care may be appropriate
- Shown to be deliberately invented, or malicious, the college will consider whether any disciplinary action is appropriate against the individual(s) who made it

### **Confidentiality and information sharing**

The college will make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered.

The case manager will take advice from the LADO, police and children's social care services, as appropriate, to agree:

- Who needs to know about the allegation and what information can be shared
- How to manage speculation, leaks and gossip, including how to make parents or carers of a child/children involved aware of their obligations with respect to confidentiality
- What, if any, information can be reasonably given to the wider community to reduce speculation
- How to manage press interest if, and when, it arises

### **Record-keeping**

The case manager will maintain clear records about any case where the allegation or concern meets the criteria above and store them on the individual's confidential personnel file for the duration of the case.

The records of any allegation that, following an investigation, is found to be malicious or false will be deleted from the individual's personnel file (unless the individual consents for the records to be retained on the file).

For all other allegations (which are not found to be malicious or false), the following information will be kept on the file of the individual concerned:

- A clear and comprehensive summary of the allegation
- Details of how the allegation was followed up and resolved
- Notes of any action taken, decisions reached and the outcome
- A declaration on whether the information will be referred to in any future reference

In these cases, the college will provide a copy to the individual, in agreement with children's social care or the police as appropriate.

### References

When providing employer references, we will:

- Not refer to any allegation that has been found to be false, unfounded, unsubstantiated or malicious, or any repeated allegations which have all been found to be false, unfounded, unsubstantiated or malicious
- Include substantiated allegations, provided that the information is factual and does not include opinions

### Learning lessons

After any cases where the allegations are *substantiated*, the case manager will review the circumstances of the case with the local authority's designated officer to determine whether there are any improvements that we can make to the college's procedures or practice to help prevent similar events in the future.

This will include consideration of (as applicable):

- Issues arising from the decision to suspend the member of staff
- The duration of the suspension
- Whether or not the suspension was justified
- The use of suspension when the individual is subsequently reinstated. We will consider how future investigations of a similar nature could be carried out without suspending the individual

For all other cases, the case manager will consider the facts and determine whether any improvements can be made.

### Non-recent allegations

Abuse can be reported, no matter how long ago it happened.

We will report any non-recent allegations made by a child to the LADO in line with our local authority's procedures for dealing with non-recent allegations.

Where an adult makes an allegation to the college that they were abused as a child, we will advise the individual to report the allegation to the police.

## **Section 2: concerns that do not meet the harm threshold**

The section is based on 'Section 2: Concerns that do not meet the harm threshold' in part 4 of Keeping Children Safe in Education.

This section applies to all concerns (including allegations) about members of staff, including supply teachers, volunteers and contractors, which do not meet the harm threshold set out in section 1 above.

Concerns may arise through, for example:

- Suspicion
- Complaint
- Disclosure made by a child, parent or other adult within or outside the college
- Pre-employment vetting checks

We recognise the importance of responding to and dealing with any concerns in a timely manner to safeguard the welfare of children.

### **Definition of low-level concerns**

The term 'low-level' concern is any concern – no matter how small – that an adult working in or on behalf of the college may have acted in a way that:

- Is inconsistent with the staff code of conduct, including inappropriate conduct outside of work, **and**
- Does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the designated officer at the local authority

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

- Being overly friendly with children
- Having favourites
- Taking photographs of children on their mobile phone
- Engaging with a child on a one-to-one basis in a secluded area or behind a closed door
- Using inappropriate sexualised, intimidating or offensive language

### **Sharing low-level concerns**

We recognise the importance of creating a culture of openness, trust and transparency to encourage all staff to share low-level concerns so that they can be addressed appropriately.

We will create this culture by:

- Ensuring staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others
- Empowering staff to share any low-level concerns
- Empowering staff to self-refer

- Addressing unprofessional behaviour and supporting the individual to correct it at an early stage
- Providing a responsive, sensitive and proportionate handling of such concerns when they are raised
- Helping to identify any weakness in the college's safeguarding system

### **Responding to low-level concerns**

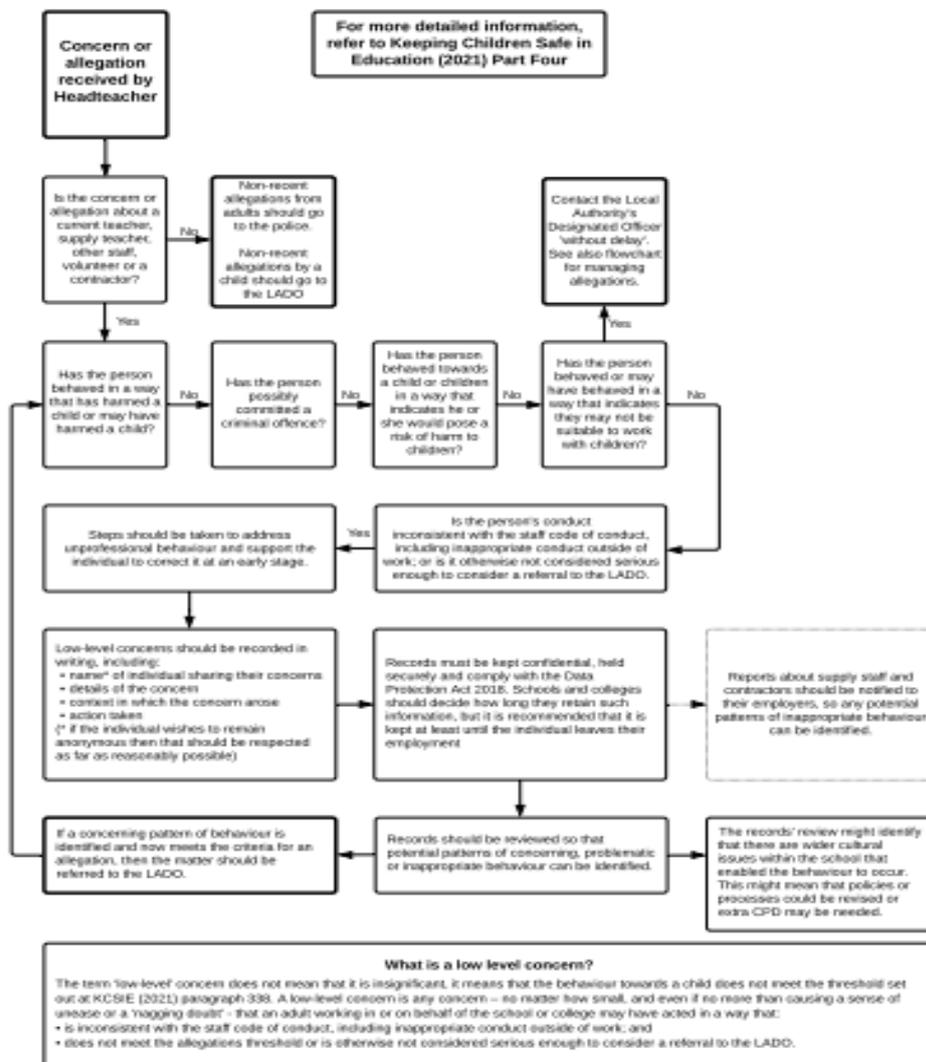
If the concern is raised via a third party, the Principal will collect evidence where necessary by speaking:

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

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

[Developing and implementing a low-level concerns policy: A guide for organisations which work with children](#)

## Managing low level concerns raised in relation to teachers, including supply teachers, other staff, volunteers and contractors





## Record keeping

All low-level concerns will be recorded in writing. In addition to details of the concern raised, records will include the context in which the concern arose, any action taken and the rationale for decisions and action taken.

Records will be:

- Kept confidential, held securely and comply with the DPA 2018 and UK GDPR
- Reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, we will decide on a course of action, either through our disciplinary procedures or, where a pattern of behaviour moves from a concern to meeting the harms threshold as

described in section 1 of this appendix, we will refer it to the designated officer at the local authority

- Retained at least until the individual leaves employment at the College

Where a low-level concern relates to a supply teacher or contractor, we will notify the individual's employer, so any potential patterns of inappropriate behaviour can be identified.

## References

We will not include low-level concerns in references unless:

- The concern (or group of concerns) has met the threshold for referral to the designated officer at the local authority and is found to be substantiated; and/or
- The concern (or group of concerns) relates to issues which would ordinarily be included in a reference, such as misconduct or poor performance

## 10. Checking the identity and suitability of visitors

All visitors will be required to verify their identity to the satisfaction of reception and college security staff

If the visitor is unknown to the setting, we will check their credentials and reason for visiting before allowing them to enter the setting. Visitors should be ready to produce identification.

Visitors are expected to sign in using the visitors' electronic sign in system and wear a visitor's badge with photo ID printed on it.

Visitors to the college who are visiting for a professional purpose, such as educational psychologists and college improvement officers, will be asked to show photo ID and:

- Will be asked to show their DBS certificate, which will be checked alongside their photo ID; or
- The organisation sending the professional, such as the LA or educational psychology service, will provide prior written confirmation that an appropriate level of DBS check has been carried out (The College will seek to make arrangement with the LA to ensure that their staff are all enhanced DBS checked and carry photo ID.).

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

## **APPENDIX TWO**

### **Safeguarding students susceptible to extremism and radicalisation**

WQE recognises the duties placed on us by the Counter Terrorism and Border Security Act 2019 to prevent students being drawn into terrorism. These include:

- Assessing the risk of students being drawn into terrorism
- Working in partnership with relevant agencies under our Safeguarding Partners procedures
- Appropriate staff training
- Appropriate online filtering

WQE is committed to actively promoting fundamental British Values.

There current threat from terrorism in the UK is substantial and this can include the exploitation of vulnerable young people, aiming to involve them in terrorism or to be active in supporting terrorism.

WQE seeks to protect students against the messages of all violent extremism including but not restricted to those linked to Islamic ideology, Far Right / Neo Nazi / White Supremacist ideology etc. Concerns should be referred to the Single Point of Contact (SPOC) – Associate Principal (Students and Welfare) who has local contact details for Prevent and Channel referrals. They will also consider whether circumstances require Police to be contacted.