

Safeguarding / Child Protection and Vulnerable Adults Policy

Policy Number – P06

Document control

Version	Date	Author(s)	Notes on Revisions
1.0	October 2011	Liz Lawrence	
2.0	August 2013	Liz Lawrence	To include changes legislation during 2013
3.0	September 2014	Liz Lawrence	Includes new legislation
3.1	September 2015	Liz Lawrence	Updated with new safeguarding staff members details
4.0	December 2015	Liz Lawrence	Includes new legislation, updated with staff/governor details
5.0	October 2016	Liz Lawrence	Includes new legislation
5.1	September 2017	Liz Lawrence	Updated with safeguarding staff members details
5.2	January 2018	Liz Lawrence	Updated with safeguarding staff members details
5.3	September 2018	Liz Lawrence	Rewrite in line with updated KCSIE guidance
5.4	December 2019	Liz Lawrence	Update with KSCIE changes
5.5	September 2020	Liz Lawrence	Update with KSCIE changes
5.6	October 2021	Liz Lawrence	Update with KSCIE changes
6.0	October 2022	Liz Lawrence	Update with KSCIE changes
7.0	September 2023	Kelly Sooben	Update to reflect KSCIE changes
8.0	January 2024	Kelly Sooben	Update to reflect new Safeguarding Governor

Owner	SLT Lead	Author	Frequency of review	Next review date	Approval Committee	Next approval Committee Date	Date of last EIA
EL	EL	EL	Annual	Aug 2014	Full Govs	24/10/13	20/09/13
EL	EL	EL	Annual	Aug 2015	QTLA Committee	20/11/14	17/10/14
EL	EL	EL	Annual	Oct 2016	QTLA Committee	11/02/16	22/01/16
EL	EL	EL	Annual	Oct 2017	Full Governing Body	20/10/16	13/10/17
EL	EL	EL	Annual	Oct 2018	Full Governing Body	19/10/17	17/07/18
EL	EL	EL	Annual	July 2018	Full Governing Body	06/12/18	
EL	EL	EL	Annual	June 2019	Full Governing Body	12/12/19	24/01/20
EL	EL	EL	Annual	Sept 2020	Full Governing Body	10/12/20	11/11/20
EL	EL	EL	Annual	Oct 2021	Full Governing Body	09/12/21	04/02/22
EL	EL	EL	Annual	Dec 22	Full Governing Body	10/12/22	01/12/22
KS	KS	KS	Annual	August 2024	Full Governing Body	7/12/23	

Academic Year Sept 2023/24

Keeping Children Safe in Education (2023) came into force on 1st September

2023 [Keeping children safe in education 2023 \(publishing.service.gov.uk\)](https://publishing.service.gov.uk)

This is statutory guidance from the Department for Education ('the Department') issued under Section 175 of the Education Act 2002 (as amended), the Education (Independent School Standards) Regulations 2014, the Non-Maintained Special Schools (England) Regulations 2015 and the Apprenticeships, Skills, Children and Learning Act 2009 (as amended). Schools and colleges in England must have regard to it when carrying out their duties to safeguard and promote the welfare of children. For the purposes of this guidance children includes everyone under the age of 18.

Staff working with children are advised to maintain an attitude of 'it could happen here' where safeguarding is concerned.

When concerned about the welfare of a child, staff should always act in the best interests of the child.

If staff have any concerns about a child's welfare, they should act on them immediately.

Student Safeguarding and Wellbeing Team

Kelly Sooben is the Designated Safeguarding Lead and Child Protection Lead for the College: 01803 540532 (07805162193)

Rhiannon Gray and **Brittany-May Benton** are the Deputy Safeguarding Leads and Deputy Child Protection Leads for the College:

- Rhiannon Gray (Mon-Wed): 07900 287135

- Brittany May Benton (Wed- Fri): 07778 019791

Sophie Linger is Head of Student Services and Wellbeing for the college: 01803 540505

Safeguarding & Wellbeing Team, Ext. 321 (room 3.131) can also deal with any Safeguarding or Child Protection concerns if Rhiannon and Brittany are unavailable. You can also email safeguarding@southdevon.ac.uk

Designated Staff for Safeguarding

Name	Ext.	Mobile	Room
Kelly Sooben	532	07805 162193	3.115
Rhiannon Gray (Mon-Wed)	321	07900 287135	3.131
Brittany-May Benton (Wed-Fri)	321	07778 019791	3.131
Gemma Kilpatrick (inc. SDHS)	321	07834 773391	3.131
Hattie Linger (inc. Home Ed.)	321	07552 980458	3.131
Julie Cude	321	07884 567758	3.131
Rachel Sewell (medical)	321	07831 990357	3.131
Scarlett Stevenson	321	07778 019618	3.131

You can also contact all safeguarding officers on Teams or by email

Note: All Contents relate to South Devon College, South Devon High School and UCSD

Contents

	Section	Page
	Safeguarding Policy	
1	Introduction	4
2	Scope & Overall aims	4
3	Guiding principles	5
4	Expectations	6
5	Definitions	9
6	The Governing body	9
7	Signs and Symptoms of abuse and neglect	10
8	Safeguarding issues and behaviours	11
9	Early help	12
10	Designated staff with responsibility for safeguarding	12
11	Disclosure of Abuse and Procedure for Reporting Concerns	15
12	Child on child abuse	17
13	Sexual violence and/or sexual harassment	18
14	Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)	18
15	Domestic abuse	20
16	Children Missing in Education	20
17	The Prevent Duty	21
18	Special educational Needs	22
19	Private fostering	23
20	Serious violence	23
21	Female genital mutilation	24
22	Mental Health	25
23	Children who have a Social worker	25
24	Reasonable Force	26
25	So-called 'honour-based' abuse	26
26	On-line safety	26
27	Safer recruitment	29
28	Recruitment and selection procedures	29
29	Allegations against staff	30
30	Suspension of Staff	32
31	The Disciplinary Investigation	33
32	Allegation outcomes	33
33	Record keeping	34
34	Concerns and allegations that do not meet the harm threshold	34
35	Monitoring effectiveness	35
	Appendices	
1	Statutory guidance	36
2	Useful web-links and documents	37
3	College Policy/Procedures and Documents	37
4	Child Protection Procedure Flowchart	38
5	FGM	38
6	Supply teachers	39
7	Remote education and keeping children safe online	39
8	Harmful sexual behaviour	41

1.0 Introduction

At South Devon College, including South Devon High school and UCSD, Safeguarding and promoting the welfare of children is everyone's responsibility. Everyone who comes into contact with children has an important role to play.

School and college staff are particularly important as they are in a position to identify concerns early, provide help for children, promote children's welfare and prevent concerns from escalating. It is important all staff (including those who do not work directly with children) recognise the important role they play in protecting children.

Staff in our College take all welfare concerns seriously and encourage children and young people to talk to us about anything that worries them.

The college assesses the risks and issues in the wider community when considering the well-being and safety of its students.

We will always act in the best interest of the child. 'Children' includes everyone under the age of 18.

South Devon College has a statutory and moral duty to ensure that the College functions with a view to safeguarding and promoting the welfare of children, young people and vulnerable adults receiving education and training at the College. This policy has been written incorporating legislation "Keeping Children Safe in Education" and "Working together to safeguard children" and in line with the PREVENT Duty agenda on counter terrorism. The PREVENT agenda is seen as part of the College safeguarding strategy and therefore is embedded in this policy.

This policy has been written utilising the Local Safeguarding partnership policies and procedures, the Local safeguarding partnership arrangements, and the local protocol for preventing violent Extremism and Terrorism in the context of ensuring recognition of Child Protection, Safeguarding and the protection of vulnerable adults.

Throughout these policies and procedures, reference is made to 'children and young people' (Section 175 of the Education Act, 2002). This term is used to mean 'those under the age of 18'. The safeguarding of children and young persons under 18 in the UK is normally referred to as 'Child Protection' and will be used in this policy document. The Governing Body recognise that some adults (over 18) are also vulnerable to abuse; accordingly, the procedures will be applied to allegations of abuse and the protection of vulnerable adults (POVA). From a definitional viewpoint, this document treats "child protection" as inclusive of the protection of vulnerable adults.

2.0 Scope

For the purpose of Safeguarding & Child Protection this policy covers:

- Students from local secondary and special educational need schools who are under the minimum school leaving age (MSLA), between the ages of 14 & 17 years ten months, on courses including Increased Flexibility programmes (IFP), Young Apprenticeship programmes & 14-16 Re-engagement programmes
- South Devon High School students
- EHE (Electively Home Educated) students
- Work experience placements for students under 18, organised by the College
- Enrolled full-time and part-time students under the age of 18
- Short foreign exchange students
- Taster programmes
- Franchised provision
- Students under 18 attending the college as part of 'employed status' apprenticeships
- Adult students including Adults At Risk enrolled at the College
- Visitors to the College (under 18)
- Volunteers (under 18)

It should be noted that apprenticeships are not subject to the Department for Education guidance on child protection once they have an 'employed status' contract. However, South Devon College considers that the child protection principles contained in the DFE guidance for those under 18, on school roles, should be observed whenever practically possible. The college also has a University Centre that has a duty of care to safeguard vulnerable adults.

2.1 Overall Aims

Children at South Devon College are taught about how they can keep themselves and others safe, including online. We are sensitive to the specific needs and vulnerabilities of individual children, including children who are victims of abuse, and children with special educational needs or disabilities.

Students receive Safeguarding training through the Personal Development and Tutorial from the point of induction. There are posters all around the college informing them about safeguarding and referral procedures and our Safeguarding & Wellbeing services.

This policy will contribute to the protection and safeguarding of our **pupils/students** and promote their welfare by:

- Adopting a whole school and college approach to safeguarding
- Making clear the need for ensuring that safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development in schools and colleges.
- Clarifying standards of behaviour for staff and pupils/students through our FE Behaviour Policy and FE Disciplinary Procedure
- Contributing to the establishment of a safe, resilient and robust ethos in the school, built on mutual respect and shared values.
- Introducing appropriate personal development within the curriculum.
- Alerting staff to the signs and indicators that all may not be well.
- Developing staff awareness of the causes of abuse.
- Developing staff awareness of the risks and vulnerabilities their pupils/students face.
- Addressing concerns at the earliest possible stage.
- Reducing the potential risks pupils/students face of being exposed to multiple harms including violence, extremism, exploitation, discrimination or victimisation.
- Recognising risk and supporting online safety for pupils, including in the home and monitoring at College.
- Adding in extra support for Young Adult Carers, Looked after Children (LAC) and Care Experienced Learners (CELs)
- Having a key focus on all vulnerable learners and regularly monitoring their progress.

3.0 Guiding Principles

South Devon College believes that:

- Our children/young people have the right to be protected from harm, abuse and neglect.
- Our children/young people have the right to experience their optimum mental and physical health.
- Every child has the right to an education and children/young people need to be safe and to feel safe in college.
- Children/young people need support that matches their individual needs, including those who may have experienced abuse.
- Our children/young people have the right to express their views, feelings and wishes and voice their own values and belief.
- Our children/young people should be encouraged to respect each other's values & support each other.
- Our children/young people have the right to be supported to meet their emotional, social and mental health needs as well as their educational needs.
- Our College will ensure clear systems and processes are in place to enable identification of needs, including consideration of when mental health needs may become a safeguarding need.
- Our College will contribute to the prevention of abuse, risk/involvement in serious violent crime, victimisation, bullying (including homophobic, biphobic, transphobic, racist and cyber bullying), exploitation, extreme behaviours, discriminatory views and risk-taking behaviours.

All staff, contractors and visitors have an important role to play in safeguarding children/young people and protecting them from abuse and considering when mental health may become a safeguarding issue.

Safeguarding and promoting the welfare of children is everyone's responsibility. Everyone who comes into contact with children and their families has a role to play. In order to fulfil this responsibility effectively, all practitioners should make sure their approach is child-centered. This means that they should consider, at all times, what is in the best interests of the child.

No single practitioner can have a full picture of a child's needs and circumstances. If children and families are to receive the right help at the right time, everyone who comes into contact with them has a role to play in identifying concerns, sharing information and taking prompt action.

Safeguarding and promoting the welfare of children is defined for the purposes of this guidance as:

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

Children includes everyone under the age of 18.

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

Please note that this policy and the statutory guidance behind it will now also be applicable to government funded post 16 Education; 16-19 Academies, Special Post-16 institutions and Independent Training Providers, who are now required to have regard to KCSiE following the enactment of The Education and Training (Welfare of Children) Act 2021. KCSiE now states that 'college' includes providers of post 16 Education as set out in the Apprenticeships, Skills, Children and Learning Act 2009 (as amended): 16-19 Academies, Special Post-16 institutions and Independent Training Providers.

4.0 Expectations

At South Devon College, **all** staff must:

- Have read and understood Keeping Children Safe in Education (2023) [Part One]; and school leaders and staff that work directly with children should also read Annex B. The college keep records of all staff who have read, and signed to state they understood Part One.
- Have read and understood the Staff Code of Conduct
- Have read and understood the Safeguarding and Child Protection Policy
- Have read and understood Student Behaviour Policy
- Be alert to signs and indicators of possible abuse
- Understand the role and identity of the Designated Safeguarding Lead (DSL) and Deputy Designated Safeguarding Leads (DDSLs)
- Record concerns and give the record to the DSL or Deputy DSL
- Deal with disclosures of abuse from children in line with the college guidance, informing the DDSL immediately and providing a written account as soon as possible
- Be involved, where appropriate, in the implementation of individual interventions.
- Be aware of systems within South Devon High School & College which support safeguarding, & these will be explained to them as part of staff induction. This includes the college's Safeguarding and Child Protection Policy; the college's staff behaviour policy (Code of Conduct); safeguarding response to children who go missing in education & the named designated safeguarding leads.

- Be aware of the signs of abuse and neglect so that they are able to identify cases of children who may need help or protection.
- Know what to do if a child tells them they are being abused, exploited, or neglected. and how to manage the requirement to maintain an appropriate level of confidentiality. This means only involving those who need to be involved, such as the designated safeguarding lead (or a deputy) and local authority children's social care. Staff should never promise a child that they will not tell anyone about a report of any form of abuse, as this may ultimately not be in the best interests of the child.
- All staff must take part in appropriate safeguarding and child protection training (including online safety which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring) at induction. The training should be regularly updated. In addition, all staff must take part in safeguarding and child protection (including online safety) updates (for example, via email, e-bulletins, and staff meetings), as required, and at least annually, to continue to provide them with relevant skills and knowledge to safeguard children effectively.

Be able to reassure victims that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting any form of abuse and/or neglect. Nor should a victim ever be made to feel ashamed for making a report.

SDC adheres to the following:

All schools/colleges should protect children and promote their welfare by:

- teaching our students about safeguarding, including online, through various teaching and learning opportunities, as part of providing a broad and balanced curriculum. Children and young people are taught to recognise when they are at risk, including online, and how to get help when they need it providing a safe environment for children to learn in.
- creating a culture of vigilance, which recognises and understands the importance of safeguarding, including listening to and discussing with children.
- identifying children who are suffering or likely to suffer significant harm, both at school/college and at home, and referring immediately any concerns to the local authority children's social care services.
- preventing unsuitable people from working with children by undertaking safer recruitment best practice.
- working in partnership to prevent children, adults and young people who are vulnerable from being drawn into violent extremism and terrorism.
- Offering high quality training on healthy relationships, Sexual Violence, Coercion and control and Sexual Harassment to ensure all staff and students are aware of the dangers.
- having systems and processes that ensure children are kept safe including online and allow for poor and unsafe practice to be challenged.
- identifying instances in which there are grounds for concern about a child's welfare and initiating or taking appropriate action to keep them safe, contributing to effective partnership working between all those involved with providing safeguarding services for children.
- the college will have at least two emergency contacts for every child in the High School and college in case of emergencies, and in case there are welfare concerns at the home.
- a commitment to all staff that they will receive regular safeguarding updates, as required, but at least annually, to provide them with relevant skills and knowledge to safeguard children effectively.

The college has;

- appointed and trained a Senior Leader who is Designated Safeguarding Lead for Children and Vulnerable Adults, (and deputies who deal with the day-to-day student matters) These Safeguarding persons will attend regular updated training.
- provided opportunity for staff to attend training on recognising abuse and neglect and preventing impairment of children's mental and physical health or development, responding appropriately to concerns relating to suspected, alleged, or disclosed abuse, recording, reporting, information sharing and confidentiality as appropriate. SDC offers regular safeguarding training on local issues as well as new/updated legislation.

Staff should share any concerns they have about a child with the Safeguarding & Wellbeing Team or Deputy Designated Safeguarding Leads. However, it should be remembered that sometimes children will 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.

All staff are made aware of safeguarding issues through the college induction process, CPD and regular updates. These come out on email, via CPD dedicated training information and newsletters.

All staff members will also receive appropriate Child Protection training and /prevent training which is regularly updated (at least annually) via training, email, bulletins etc.

The Governing Body has nominated Jane Viner as Governor with special responsibility for child protection issues and PREVENT (including protection of vulnerable adults). The Governors will undertake appropriate training.

The Principal and all staff working with children and vulnerable adults will receive appropriate training to familiarise them with child protection issues and responsibilities and the College procedures and policies and will receive annual updates via training, email, bulletins etc.

The College uses curriculum, enrichment and other opportunities to help children, young people and vulnerable adults to develop self-esteem, assertiveness, promote their resilience and learn about safeguarding matters including PREVENT, mental and physical health, sexually harmful behaviours healthy relationships and online safety.

The College safely recruits and trains employees, and volunteers to adopt best practice to safeguard children, young people and vulnerable adults from abuse, and themselves from false allegations. The College Provides enhanced DBS checks for all new staff and prohibition checks in line with legislation.

The College Provide opportunities for children, young people and vulnerable adults to talk about concerns relating to their welfare through the personal development programme and the UCSD well-being Hub.

The College provides support for children, young people and vulnerable adults who have disclosed abuse and for the staff/volunteers who have experienced a young person or vulnerable adults' disclosure. The Safeguarding & Wellbeing hub is a safe place for students to get support from highly trained staff who are qualified to level 3 safeguarding and mental health first aid trained as a minimum. Where needed the team will refer to the counselling team, the Mental health support team or to external partner agencies or refer students to Childrens social services. The resource offers a small food bank and other personal necessities and works to support students with basic and housing needs. The key aim is to remove any barriers for students to attend their classes. Adult students at Level 4 and above have access to the UCSD wellbeing hub. On SDCentral, we list support available to our students.

The College develops and promotes effective working relationships with other agencies, especially; The Police, local Children's and Adults Social Services, CAMHS, Young Devon, the MHST and other relevant agencies, local schools and the local safeguarding partnership – Torbay and Devon Safeguarding

Children Partnership.

The College will respond promptly, within the timescale laid out in the procedures, to allegations of abuse or abuse of trust made against employees or volunteers or incidents of suspicious poor practice, implementing the appropriate disciplinary and appeals procedures. Such concerns will be referred to the Designated Safeguarding Lead (DSL) and the Principal. The Local Authority Designated Officer (LADO) will be informed, and we will work with the LADO throughout the process.

The College will not tolerate abusive behaviour and has a Whistleblowing Policy to protect staff who disclose information regarding abuse by a colleague or other adult towards young people.

All individuals, including those in a position of trust, are expected to act professionally at all times, and to be familiar with college policies and procedures including the staff Code of Conduct.

The College has provided a systematic means of monitoring (through the Personal Development tutorial system, CPOMS and On-Track), young people and vulnerable adults known, or thought to be at risk of harm, and contribute to assessments of need and support plans for them. We will be particularly focused on those students deemed to be vulnerable including those who have an identified SEN, children looked after or care-experienced.

5.0 Definitions - Child Protection and Safeguarding - what is the difference?

Definitions:

Child protection looks at **recognising abuse and neglect and acting on it**, whereas **safeguarding** looks at keeping children, young people and vulnerable adults safe from a much wider range of potential harm, and delivers preventative action, not just reaction.

Safeguarding and promoting the welfare of children is defined for the purposes of this guidance as

- 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.

Child: up to their 18th birthday (UN convention of the Rights of the Child)

Vulnerable adult is an individual aged 18 years and over who:

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

6.0 The Governing Body

Governing bodies and proprietors have strategic responsibility for the schools/colleges safeguarding arrangements and therefore should ensure that there are appropriate policies and procedures in place in order for appropriate action to be taken in a timely manner to safeguard and promote children's welfare:

South Devon College Governing body is committed to ensuring that the College:

- takes reasonable care to adhere wherever practically possible to the relevant UK child protection legislation and the guidance provided by Government Departments and relevant funding bodies (www.teachernet.gov.uk)

- provides a safe environment for children, young people and vulnerable adults to learn in;
- identifies children, young people and vulnerable adults who are suffering, or likely to suffer, significant harm; and
- takes appropriate action to see that such children, young people and vulnerable adults are kept safe, both at home, online and at the College.

In pursuit of these aims, the Governing Body will approve and annually review policies and procedures with the aim of:

- protecting children, young people and vulnerable adults from maltreatment
- preventing impairment of children's and young person's mental and physical health or development
- ensuring that children and young persons are growing up in circumstances consistent with the provision of safe and effective care
- Undertaking that role to enable those children and young persons to have optimum life chances and to enter adulthood successfully.

In developing the policies and procedures, the Governing Body will consult with and take account of guidance issued by the Department for Education and other relevant bodies and groups. The procedures have been developed in cooperation with the Torbay and Devon's Safeguarding partnership and an annual audit will be completed in September every 2 yrs. Further, the College will provide an action plan for the Colleges Prevent strategy to the Devon Public Protection Team responsible for Prevent.

The Governing Body will undertake the necessary safeguarding training for their role.

The Governing Body will receive from the designated senior member of staff with lead responsibility for safeguarding children and young people a termly report which reviews how the duties have been discharged.

7.0 Signs and Symptoms of Abuse and Neglect

(Keeping Children Safe in Education (September 2023) Paragraphs 26 - 30)

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

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

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

Sexual abuse: involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education and all staff should be aware of it and of their school or college's policy and procedures for dealing with it.

Neglect: the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy, for example, as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate caregivers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

8.0 Safeguarding issues and behaviours

All staff should have an awareness of safeguarding issues that can put children at risk of harm. Behaviours linked to issues such as:

- Drug taking, alcohol abuse, deliberately missing education and sharing nudes and semi nudes (also known as youth -produced sexual imagery put children in danger).
- Child on Child abuse
- All staff should be aware that children can abuse other children (often referred to as child on child). This is most likely to include but may not be limited to:
 - bullying (including cyberbullying)
 - physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm
 - sexual violence, such as rape, assault by penetration and sexual assault
- Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment which may be stand-alone or part of a broader pattern of abuse.
- Up-skirting, which typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm.
- Sexting (also known as youth produced sexual imagery or sharing nude and semi- nude images).
- Initiation/hazing type violence and rituals.

Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse.

All staff should be clear as to the school's or college's policy and procedures with regards to Child on Child. All victims must be reassured that they are being taken seriously and that they will be supported and kept safe.

All staff should know what to do if a child tells them he/she/they is being abused or neglected. Staff should know how to manage the requirement to maintain an appropriate level of confidentiality. This means only involving those who need to be involved, such as the designated safeguarding lead (or a deputies) and children's social care. Staff should never promise a child that they will not tell anyone about a report of abuse, as this may ultimately not be in the best interests of the child.

9.0 Early Help

Staff have a safeguarding concern about a child, they must speak to the Designated Safeguarding Lead (DSL) or Deputy Designated Safeguarding Leads (DDSLs) (or Safeguarding & Wellbeing staff). Options will then include:

- managing any support for the child internally via the school's or college's own Safeguarding & Wellbeing support processes
- an early help assessment or referral to other agencies including the police, if necessary

All staff should be aware of the early help process, and understand their role in identifying emerging problems, sharing information with other professionals to support early identification and assessment and, in some cases, acting as the lead professional in undertaking an early help assessment. They should be aware of the process for making referrals to children's social care and for statutory assessments under the Children Act 1989 that may follow a referral, along with the role they might be expected to play in such assessments.

All college staff should identify children that may benefit from early help. Early help means providing support as soon as a problem emerges. In the first instance staff should discuss early help requirements with the Safeguarding & Wellbeing team / Deputy Designated Safeguarding Leads. Staff may be required to support other agencies and professionals in an early help assessment.

If early help is appropriate the Designated/Deputy designated safeguarding leads will support the staff member in liaising with other agencies and setting up an inter-agency assessment as appropriate.

If early help and or other support is appropriate the case should be kept under constant review and consideration given to a referral to children's social care if the child's situation does not appear to be improving.

Anyone who has a concern about a child's welfare should ensure a referral is made to children's social care. In the first instance staff should generally discuss any potential referral with the Deputy Designated Safeguarding Lead or the Safeguarding & Wellbeing Team, who in most instances would make any referral. Staff may be required to support social workers and other agencies following any referral. We will endeavor to acquire the Social Workers names and contact details.

The child's wishes: Where there is a safeguarding concern governing bodies, proprietors and school or college leaders should ensure the child's wishes and feelings are considered when determining what action to take and what services to provide. Systems are in place for children to express their views and give feedback. Governing bodies and proprietors should ensure that staff members always act in the best interests of the child the Designated Safeguarding Lead works closely with the Governing body to ensure this happens.

10.0 Designated Staff with Responsibility for Safeguarding Young People

Senior Staff Member with Lead Responsibility

The Designated Safeguarding Lead (DSL) for Safeguarding and Prevent is **Kelly Sooben, Vice Principal People & Resources** (P'ship office mobile number 07805162193, external number 01803 540532 or extension 532).

This person is a senior member of the College Leadership Team. She has a key duty to take lead responsibility for raising awareness within the staff of issues relating to the welfare of children, young people, and vulnerable adults, the promotion of a safe environment for those people learning within the College.

She has received appropriate training in child protection issues, Prevent and inter-agency working, as

required by the new local partnership arrangements, and will receive refresher training at least annually. She will keep up to date with developments in safeguarding issues.

The designated senior member of staff is responsible for:

- overseeing the referral of cases of suspected abuse or allegations to the relevant investigating agencies as agreed with the Local Partnerships arrangement
- providing advice and support to other staff on issues relating to child protection
- maintaining a proper record of any child protection referral, complaint or concern (even where that concern does not lead to a referral)
- ensuring that parents of children and young people within the College are aware of the College Safeguarding and child protection policy
- liaising with the Local Authority and CHANNEL, Police and other appropriate agencies
- liaising with secondary and special schools that send pupils to the College to ensure that appropriate arrangements are made for these pupils
- liaising with employers and training organisations that receive children or young people from the College on short or long term, placements to ensure that appropriate safeguards are put in place
- ensuring that staff receive training in safeguarding, Prevent, child protection issues and are aware of the College child protection procedures.

The designated senior member of staff (DSL) will provide a termly report to the Governing Body of the College setting out how the College has discharged its duties. She is responsible for reporting deficiencies in procedure or policy identified by the local partnership arrangement (or others) to the Governing Body at the earliest opportunity.

Deputy Designated Leads for Safeguarding

The Deputy Designated Safeguarding Leads with responsibility for operational safeguarding and PREVENT are **Rhiannon Gray** and **Brittany May Benton**, located in office 3.131, external number 01803 540558 or extension 558.

They have received training in child protection issues and PREVENT and inter-agency working, as required by the Local Safeguarding Children's Board (LSCB) and local partnership arrangement.

Deputy Designated Safeguarding Lead:

- Supports DSL in all areas and specifically deal with the day-to-day student matters
- receives referrals of cases of suspected abuse or allegations and reports to the relevant investigating agencies as agreed with local partnership
- Attends relevant external meetings and case conferences
- Offers staff training
- reports to the senior member of staff with lead responsibility
- provides advice and support to other staff on issues relating to child protection
- Implements and reviews early help support
- deals with individual cases, including attending case conferences and review meetings as appropriate
- maintains a proper record of any child protection referral, and safeguarding issue or concern (even where that concern does not lead to a referral)
- will attend training in child protection issues and inter-agency working, as required and will receive refresher training at least annually.
- Safeguarding & Wellbeing Team: Sophie Linger is the Student Services Head, overseeing the Safeguarding & Wellbeing Team - 01803 540505

Designated Teacher for looked after Children: **Alex Howarth, Head of SEND, Learning Opportunities and Vulnerable Learners** supported by the below:

Nikki Boone, Jess Tucker and Luke Peakman are the Heads of Personal Development and Learner Progress, who promote the educational achievement of and specifically close the achievement gap for those children who are looked after.

Nikki Boone - leads the **PREVENT** curriculum

Sandy Akerman - **HE student wellbeing Senior Coordinator**

Issy Hallam – **HE Student Development and Tutorial**

Manager Other trained designated staff:

The College has other trained designated staff who can give help and advice in the absence of the DSL or DDSLs - these include the Safeguarding & Wellbeing Team members who are based in room 3.131, all of whom are Safeguarding level 3 trained and Youth Mental Health First Aiders:

Rachel Sewell (Medical Lead)

Safeguarding & Wellbeing Team - telephone 01803 540321

Additional staff with a safeguarding responsibility:

- **James McCauley (Deputy Head of South Devon High School)**
- **Sophie Linger (Head of Student Services and Wellbeing)**

All Staff have a responsibility for Safeguarding and Child Protection. All staff have a responsibility to actively make the learning environment safe and secure for all. All staff must attend the appropriate mandatory training offered by the college and attend annual training/ read updates and attend any other safeguarding training as required by the college to keep regularly updated to ensure their knowledge is current. Staff must be familiar with all related policies and procedures as outlined in the Safeguarding Child Protection Policy (Incorporating Prevent).

Designated Governor

The designated member of the Governing Body with responsibility for child protection issues is **Jane Viner**, contactable through the Principal's Office (01803 540580).

The Designated Governor is responsible for liaising with the Principal and Senior Staff Member with Lead Responsibility over matters regarding child protection, including:

- ensuring that the College has procedures and policies which are consistent with those of Local partnership arrangement.
- ensuring that the Governing Body considers the College policy on safeguarding young people each year
- ensuring that each year the Governing Body is informed of how the College and its staff have complied with the policy, including but not limited to a report on the training that staff have undertaken

The Designated Governor is responsible for overseeing the liaison between the agencies, such as the police, social services, in connection with allegations against the Principal or the Senior Staff Member with Lead Responsibility. This does not involve undertaking any form of investigation but will ensure good communication between the parties and provide information to assist enquiries.

To assist in these duties, the Designated Governor receives appropriate training [as directed by the Local

safeguarding partnership].

11.0 Disclosure of Abuse and Procedure for Reporting Concerns (General Statement)

All school and college staff have a responsibility to provide a safe environment in which children can learn. All school and college staff have a responsibility to identify children who may need early help or extra help or who are suffering, or are likely to suffer, significant harm. All staff then have a responsibility to take appropriate action, working with other services as needed.

All college staff members should be aware of the signs of abuse and neglect so that they are able to identify cases of children who may need help or protection.

All staff members have a duty to disclose any personal issues that relate to current or previous child protection matters within their personal lives which could impact on their job role.

Staff members working with children are advised to maintain an attitude of 'it could happen here' where safeguarding is concerned. When concerned about the welfare of a child, staff members should always act in the interests of the child.

Safeguarding issues can revolve around one or **more** of the following:

- Neglect
- Physical Abuse
- Sexual Abuse
- Emotional Abuse
- Impairment of mental and physical health

And specific safeguarding matters:

- Bullying or harassment (including cyberbullying)
- Child abduction and community safety incidents
- Child missing from education or home or care
- Children with family members in prison
- Cybercrime
- Gang and youth violence - County lines
- Preventing radicalisation
- Domestic abuse
- Sexual violence/ sexual harassment/harmful sexual behaviour
- Child sexual exploitation (CSE)
- Child criminal exploitation (CCE)
- Knife crime
- Gender-based violence/violence against women and girls (VAWG)
- 'Honour-based' abuse, including Female genital mutilation and Forced Marriage
- Teenage relationship abuse
- Sexting / revenge porn
- Faith abuse
- Drugs and alcohol abuse
- Private fostering issues
- Mental health issues
- Self harm
- Trafficking / modern slavery
- Fabricated or induced illness
- Suicide ideation
- Peer on peer abuse/ child on child abuse
- Up skirting- which is now a criminal offence
- FGM
- <https://www.gov.uk/government/publications/mandatory-reporting-of-female-genital-mutilation->

- Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse.'

The College assesses the risks and issues in the wider community when consider the well-being and safety of its students.

Children can be at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual abuse (including harassment and exploitation), domestic abuse in their own intimate relationships (teenage relationship abuse), criminal exploitation, serious youth violence, county lines, and radicalisation.'

DPA and UK GDPR do not prevent the sharing of information for the purposes of keeping children safe and promoting their welfare. If in any doubt about sharing information, staff should speak to the designated safeguarding lead (or a deputy). Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare of children.

Safeguarding Reporting Procedure - See flowchart appendix 4

If a child or young person tells a member of staff about any possible abuse, or has concerns about CSE, Sexual violence, peer on peer abuse or radicalisation, the member of staff should inform the student that there may be consequences as a result of her/his disclosure, and that this information may be passed on to the DSL, DDSL, Safeguarding & Wellbeing Team.

The member of staff should:

1. Listen to the student. Do not directly question the student or ask leading questions. Do not stop a student who is freely recalling significant events – just listen
2. Make a written note of the account taking care to record the time and setting as well as what was actually said. Record the student's own words wherever possible. Be objective and precise
3. Explain to the student what is going to happen next. You must inform the student that you may need to pass the information on to the DDSL, and that you are not able to keep child protection matters to yourself. Remind the student that you will only pass the information on to the DDSL/Safeguarding & Wellbeing Team. Ensure that the student is supported and kept informed. You must always act in the best interest of the child.
4. Notify the DDSL without delay. It is advisable to stay with the student until the referral has been completed
5. Inform the Curriculum Head that you have concerns and that you have referred the matter to the DDSL. (It is important that you do not disclose the name of the student to the Curriculum Head or details of the disclosure unless it is absolutely necessary.)

If the DDSL or DSL is not available, staff should speak to a member of the Safeguarding & Wellbeing team or SLT and/or take advice from local children's social care.

If, at any point, there is a risk of immediate serious harm to a child a referral should be made to children's social care and/or the Police immediately. Anybody can make a referral.

If the child's situation does not appear to be improving the staff member with concerns should press for re-consideration. Concerns should always lead to help for the child at some point.

What to do if you are worried a child is being abused - Advice for practitioners provides more information on understanding and identifying abuse and neglect. Examples of potential signs of abuse and neglect are highlighted throughout the advice and will be particularly helpful for school and college staff. The NSPCC website also provides useful additional information on types of abuse and what to look out for.

Procedures for reporting and recording must be followed and confidentiality adhered to at all times.

Lines of communication with regard to child protection issues must be limited to those directly involved on a '**need to know**' basis.

Staff should not investigate concerns or allegations themselves but should report them immediately as per procedure.

Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare and protect the safety of children.

12.0 Child-on-child Abuse

All child-on-child abuse is unacceptable and will be taken seriously. 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
- Abuse within intimate partner relationships
- sexual violence and sexual harassment
- gender-based violence
- Consensual and non-consensual sharing of nude or semi-nude images and/or videos
- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually or to engage in sexual activity without consent
- Upskirting
- initiation-type violence and rituals.
- Online bullying
- Coercive control

Abuse must 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 South Devon College and South Devon High School we believe that all children have a right to attend education and learn in a safe environment. Children 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 Behaviour Policy.

Occasionally, allegations may be made against students by others in the school/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 pupil/student, some of the following features will be found.

The allegation:

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

At SDC we will support the victims of child-on-child abuse utilising our safeguarding & Wellbeing procedures. We will address all allegations of child-on-child abuse through investigation and adherence to our behavior policy.

In cases of sharing nude or semi-nude images or videos we follow guidance given to schools and colleges by the UK Council for Child Internet Safety (UKCCIS) published in 2020: 'Sharing nudes and semi-nudes: how to respond to an incident'

13.0 Sexual Violence and/or Sexual Harassment

KCSIE 2023 Part 5 and the separate guidance 'Sexual violence and sexual harassment between children in schools and colleges' sets out how schools and colleges should respond to all signs, reports and concerns of sexual violence and sexual harassment including those that have happened outside of the school or college premises, and/or online.

Sexual violence in this context refers to sexual offences under the Sexual Offences Act 2003.

Sexual harassment means 'unwanted conduct of a sexual nature' that can occur online and offline and both inside and outside of school/college. Sexual harassment is likely to: violate a child's dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment

Considering confidentiality and anonymity

The KCSIE outlines how to deal with reports of sexual violence and sexual harassment, including situations where the young person asks the school not to tell anyone about the incident; making referrals against the wishes of the young person; and considering the potential impact of social media breaching confidentiality.

Risk Assessments

Report of sexual violence or sexual harassment include the time and location of the incident. Subsequent risk assessments will include any actions required to make the location safer.

Impact on any siblings

It is important to understanding intra-familial harms and identify any necessary support for siblings following incidents of sexual violence or sexual harassment.

South Devon College monitors any allegations of sexually harmful behaviour & regularly reports on this to SLT.

South Devon College recognises that these issues do happen here, and we will not tolerate any form of sexually harmful behaviours.

14.0 Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)

CSE: The statutory definition of Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE) can be found in the guidance document Child sexual exploitation: See KCSIE (2023) paragraph 36 – 42.

Child sexual exploitation is a form of child sexual abuse. It occurs where an adult male or female 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.

CSE includes young people aged 16 and 17 who are over the age of sexual consent.

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 network
- Exclusion or unexplained absences from school, 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/suspicious 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
- Self-harm or significant changes in emotional wellbeing

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 violence 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)
- Sexual identity

More information can be found in: Child sexual exploitation: Definition & guide for practitioners (DfE 2017).

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 school or education or do not take part in education.

Children who have been exploited will need additional support to help maintain them in education. It is recognised that some children will suffer multiple forms of abuse, such as criminal exploitation, sexual exploitation and county lines.

‘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”.

Several indicators for children involved in county lines are detailed above, for CSE and CCE.

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.

Any member of staff who is concerned that their student is involved in county lines should contact the DSL or DDSL.

15.0 Domestic Abuse

The Domestic Abuse Act 2021 (Part 1) defines domestic abuse as any of the following behaviours, either as a pattern of behaviour, or a single incident, between two people over the age of 16, who are ‘personally connected’ to each other:

- (a) Physical or sexual abuse
- (b) Violent or threatening behaviour;
- (c) Controlling or coercive behaviour;
- (d) Economic abuse (adverse effect of the victim to acquire, use or maintain money or other property; or obtain goods or services); and
- (e) Psychological, emotional, or other abuse

People are 'personally connected' when they are or have been married to each other or civil partners; or have agreed to marry or become civil partners. If the two people have been in an intimate relationship with each other, have shared parental responsibility for the same child, or they are relatives.

The Act introduces a statutory definition of Domestic Abuse and recognises children as victims in their own right, if they see or hear, or experience the effects of the abuse. Experiencing domestic abuse can have serious lasting emotional and psychological impacts on children.

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child/adolescent to parent violence and abuse. Anyone can be a victim of domestic abuse, regardless of sexual identity, age, ethnicity, socio-economic status, sexuality or background and domestic abuse can take place inside or outside of the home.

[South Devon College is part of Operation Encompass. The helpline is available 8AM to 1PM, Monday to Friday on 0204 513 9990 (charged at local rate).]

The National Domestic Abuse helpline can be called free of charge and in confidence, 24 hours a day on 0808 2000 247.

16.0 Children Missing in Education

The College has in place appropriate safeguarding responses to children who go missing from education, particularly on repeat occasions, to help identify the risk of abuse & neglect including sexual abuse or exploitation & to help prevent the risks of their going missing in future. Our Designated deputy safeguarding Leads for The College & the High school attend the 'MISPER' group for Torbay & South Devon. (Missing persons multiagency forum)

Knowing where children are during school hours is an extremely important aspect of Safeguarding. Missing school/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 pupils are not at school. This means we need to have a least two up to date contacts numbers for parents/carers. Parents should remember to update the school as soon as possible if the numbers change.

In response to the guidance in Keeping Children Safe in Education (2021) the College/school has:

- Staff who understand what to do when children do not attend regularly
- Appropriate policies, procedures and responses for pupils who go missing from education (especially on repeat occasions).
- Staff who know the signs and triggers for travelling to conflict zones, FGM and forced marriage.

Procedures to inform the local authority when we plan to take pupils off-roll when they:

- leave school to be home educated
- move away from the school's location
- remain medically unfit beyond compulsory school age
- are in custody for four months or more (and will not return to school afterwards); or
- are permanently excluded

We will ensure that pupils who are expected to attend the high school but fail to take up the place will be referred to the local authority.

When a pupil leaves the high school, we will record the name of the pupil's new school and their expected start date.

17.0 The PREVENT Duty

As part of the Counter Terrorism and Security Act 2015, schools have a duty to 'prevent people being drawn into terrorism'. This has become known as the 'Prevent Duty'.

Prevent Duty

The College recognises the positive contribution it can make towards protecting its students from **radicalisation to violent extremism**. The college will continue to empower its students to create communities that are resilient to extremism and protecting the wellbeing of particular students who may be vulnerable to being drawn into violent extremism or crime. All staff and students will undergo appropriate training and the College will also continue to promote the development of spaces for free debate where shared values can be reinforced.

Where staff are concerned that children and young people 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.

The College has a Lead for Prevent - **Learner Progress and Personal Development - Nikki Boone.**

We use the curriculum and Personal Development including enrichment activity to ensure that children and young people and older students understand how people with extreme views share these with others, especially using the internet.

Staff should be alert to changes in students' behaviour, which could indicate that they may be in need of help or protection or are at risk of radicalisation. Staff should use their judgement in identifying 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 pupils are offered a broad and balanced curriculum that aims to prepare them for life in modern Britain. Teaching the colleges 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.

Recognising Extremism

Early indicators of radicalisation or extremism may include:

- showing sympathy for extremist causes
- glorifying violence, especially to other faiths or cultures
- making remarks or comments about being at extremist events or rallies outside school
- evidence of possessing illegal or extremist literature
- advocating messages similar to illegal organisations or other extremist groups
- out of character changes in dress, behaviour and peer relationships (but there are also very powerful narratives, programmes and networks that young people can come across online so involvement with particular groups may not be apparent.)
- secretive behaviour
- online searches or sharing extremist messages or social profiles
- intolerance of difference, including faith, culture, gender, race or sexuality
- graffiti, art work or writing that displays extremist themes
- attempts to impose extremist views or practices on others
- verbalising anti-Western or anti-British views
- advocating violence towards others

Where staff are concerned that children and young people are developing extremist views or show signs of becoming radicalized, they should discuss this with the deputy Designated Safeguarding Lead. The Deputy 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 have strong relationships with our local police force and will always work with the CHANNEL process.

All staff, contractors and volunteers receive mandatory Prevent training when joining the College. All staff are expected to undertake mandatory refresher training every 2 years. [Prevent duty training: Learn how to support people vulnerable to radicalisation | Prevent duty training \(support-people-vulnerable-to-radicalisation.service.gov.uk\)](https://www.prevent.duty.nps.gov.uk/prevent-duty-training/support-people-vulnerable-to-radicalisation.service.gov.uk)

18.0 Special Educational Needs

There is a concern sometimes that, for children with SEN and disabilities, that their SEN or disability needs are seen first, and the potential for abuse second. If children are behaving in particular ways or they're looking distressed or their behaviour or demeanor is different from in the past, maybe staff should think about that being a sign of the potential for abuse, and not simply see it as part of their disability or their special educational needs.

Children with SEND have a higher risk of being left out, of being isolated from their peers, and they are disproportionately affected by bullying. SDC will ensure that children with SEN and disabilities have got a greater availability of mentoring and support.

The College has a strong structure of SEND and Learning support staff. The college has specific bespoke curriculum to support students and dedicated areas for students that require more support.

19.0 Private Fostering

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.

Schools 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 schools 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 school. However, it should be clear to the school who has parental responsibility.

School staff should notify the designated safeguarding lead when they become aware of private fostering arrangements. The designated safeguarding lead will speak to the family of the child involved to check that they are aware of their duty to inform the LA. The school itself has a duty to inform the local authority of the private fostering arrangements.

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

20.0 Serious Violence

All staff should be aware of indicators which may signal that children are at risk from, or are involved with serious violent crime. These may include increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs.

Advice for schools and colleges is provided in the Home Office's Preventing youth violence and gang

involvement and its Criminal exploitation of children and vulnerable adults: county lines guidance.

Female genital mutilation refers to procedures that intentionally alter or cause injury to the female genital organs for non-medical reasons. The practice is illegal in the UK.

FGM typically takes place between birth and around 15 years old; however, it is believed that the majority of cases happen between the ages of 5 and 8.

Risk factors for FGM include:

- low level of integration into UK society
- mother or a sister who has undergone FGM
- girls who are withdrawn from PSHE
- visiting female elder from the country of origin
- being taken on a long holiday to the country of origin
- talk about a 'special' procedure to become a woman

The Serious Crime Act 2015 sets out a duty on professionals (including teachers) to notify police when they discover that FGM appears to have been carried out on a girl under 18. In schools, this will usually come from a disclosure (unlike in the medical profession where an observation may have been made).

Staff must personally report to the police cases where they discover that an act of FGM appears to have been carried out; and discuss any such cases with the Designated safeguarding leads and children's social care. The duty does not apply in relation to at risk or suspected cases, in these **cases staff should follow standard safeguarding procedures**.

21.0 Female Genital Mutilation reporting procedures

Where there is a disclosure of FGM it is important that staff know what their statutory response should be. Keeping Children Safe in Education (2022), paragraph 44 says 'whilst all staff should speak to the designated safeguarding lead (or deputy) with regard to any concerns about female genital mutilation (FGM), there is a specific **legal duty on teachers**. If a teacher, in the course of their work in the profession, discovers that an act of FGM appears to have been carried out on a girl under the age of 18, the teacher must report this to the police'.

What is often less well-known is what a teacher should do next to make a report.

Below is a very short summary and must be read in conjunction with the mandatory reporting guidance. (See <http://safeguarding.link/fgmreporting>)

The mandatory reporting procedures say:

'It is recommended that you make a report orally by calling 101, the single non-emergency number.'

'Where there is a risk to life or likelihood of serious immediate harm, professionals should report the case immediately to police, including dialing 999 if appropriate'.

In most cases 'reports under the duty should be made as soon as possible after a case is discovered, and best practice is for reports to be made by the close of the next working day'.

The procedures also set out what information is needed, in order to make a report.

See here: <https://www.gov.uk/government/publications/mandatory-reporting-of-female-genital-mutilation-procedural-information/mandatory-reporting-of-female-genital-mutilation-procedural-information-accessible-version#reporting>

22.0 Mental Health

In South Devon College;

- All staff will be alert to signs of mental ill-health and be 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
- All staff will take immediate action and speak to a DDSL if they have a mental health concern about a child that is also a safeguarding concern
- We take seriously our organisational and professional role in supporting and promoting mental health and wellbeing of children/young people through:
- **Prevention:** creating a safe and calm environment where mental health problems are less likely, improving the mental health and wellbeing of the whole college population, and equipping students to be resilient so that they can manage the normal stress of life effectively. This will include teaching students about mental wellbeing through the personal development curriculum and reinforcing this teaching through college themed weeks and enrichment activities.
- **Identification:** recognising emerging issues as early and accurately as possible
- **Early support:** helping students to access evidence based early support and interventions; and
- **Access to specialist support:** working effectively with external agencies to provide swift access or referrals to specialist support and treatment

Mental health support

Additional information has been added to help schools prevent and tackle bullying and support pupils whose mental health problems manifest themselves in behaviour.

Department for Education (DfE) (2017) Preventing bullying.
[Government publication preventing and tackling bullying](#)

Department for Education (DfE) (2018) Mental health and behaviour in schools
[Government publication mental health and behaviour in schools 2](#)

The College has a Designated Senior Lead for mental Health; **Kelly Sooben, Vice Principal People & Resources** and the College has a mental health whole college strategy

All staff at SDC 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. Staff are not expected or trained to diagnose mental health conditions or issues but may notice behaviours that may be of concern. Where staff have a mental health concern about a child that may also be a safeguarding concern, they should raise the issue by informing the designated Deputy

Safeguarding Lead or the DDSLs.

Staff are offered specific training in mental health such as Mental health first aid. The College has trained over 80 staff in mental health first aid.

The College also works with the Mental Health Support teams - these NHS staff are at college every Tuesday.

The Safeguarding & Wellbeing Team receive extra training in mental health support. All are mental health first aid trained.

23.0 Children Who Have a Social Worker

At SDC we recognise that when a child has a social worker, it is an indicator that the child is more at risk than most children.

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. All those students have regular access to the Safeguarding & Wellbeing team.

24.0 Reasonable force

There are circumstances when it is appropriate for staff in South Devon College to use 'reasonable force' to safeguard children. The term 'reasonable force' covers the broad range of actions used by staff that involve a degree of physical contact to control or restrain children. This can range from guiding a child to safety by the arm, to more extreme circumstances such as breaking up a fight or where a child needs to be restrained to prevent violence or injury. 'Reasonable' in these circumstances means 'using no more force than is needed'. The use of force may involve either passive physical contact, such as standing between pupils or blocking a pupil's path, or active physical contact such as leading a pupil by the arm out of the classroom.

The decision on whether or not to use 'reasonable force' to control or restrain a child is down to the professional judgement of the staff concerned within the context of the law and will always depend on individual circumstances.

When using 'reasonable force' in response to risks presented by incidents involving children with SEND, mental health problems or with medical conditions, the College will consider the risks carefully recognising the additional vulnerability of these groups. The College will also consider its duties under the Equality Act 2010 for example in relation to making reasonable adjustments and our Public Sector Equality Duty. By planning positive and proactive behaviour support, for instance through drawing up individual behaviour plans for more vulnerable children, and agreeing them with parents and carers, the College can reduce the occurrence of challenging behaviour and the need to use 'reasonable force'.

25.0 So-Called 'Honour-Based' Abuse (HBA)

Honour-based abuse encompasses crimes which have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation (FGM), forced marriage, and practices such as breast ironing. All forms of so called HBA are abuse (regardless of the motivation) and should be handled and escalated as such.

Where staff are concerned that a child might be at risk of HBA, they must contact the Designated Safeguarding Lead as a matter of urgency.

26.0 Online Safety

The safety and well-being of our students is of utmost importance, especially when it comes to their online activities. Our approach to online safety is an integral part of our Safeguarding Child protection policy, which is designed to create a secure and conducive learning environment for all students. To achieve this, we implement appropriate filtering and monitoring measures on our IT network to safeguard our students from potential online risks and threats. The College has two key IT policies that cover the network; the IT Security Policy and the IT Acceptable Use Policy. The College IT Infrastructure Manager is responsible to all network related activities with the Head of IT Services accountable for the digital infrastructure as a whole.

The breadth of issues classified within online safety is considerable and ever evolving, but can be categorised into four areas of risk:

- content: being exposed to illegal, inappropriate, or harmful content, for example: pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation, and extremism.
- contact: being subjected to harmful online interaction with other users; for example: 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: online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images (e.g. consensual and nonconsensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying,
- commerce: risks such as online gambling, inappropriate advertising, phishing and or financial scams.

26.1 Filtering:

Our college employs advanced web filtering using Smoothwall technology that allows us to control and restrict access to certain websites and content categories deemed inappropriate for students. By utilising a combination of whitelisting and blacklisting techniques, we ensure that students can access educational resources while keeping them safe from harmful or age-inappropriate content. Our filtering system is regularly updated to adapt to emerging online threats and to comply with relevant regulations.

The filtering system is designed to prevent access to websites that contain explicit adult content, violence, hate speech, gambling, or any other content that could be harmful to our students. It also blocks access to websites associated with cyberbullying, self-harm, and other dangerous activities. The system is integrated with Azure AD to allow personalisation to different age groups. The College uses the South West Grid for Learning tool to test our filtering provider is signed up to relevant lists. Results show we have passed.

26.2 Monitoring:

In addition to filtering, we employ a comprehensive network monitoring system to oversee the online activities of our students. This monitoring helps us identify any potential issues or violations of our acceptable use policy, allowing us to intervene and address problems promptly. The monitoring is done with respect for privacy and in compliance with applicable data protection laws. Currently, the College utilises Darktrace to monitor its full estate and Veyon for more granular, physical monitoring.

26.3 Mobile and Smart Technology:

Recognising that many students have unrestricted access to the internet via mobile phone networks, we are aware of the potential challenges and risks associated with the use of mobile and smart technology on our premises. We encourage all stakeholders to use our network to ensure that they abide by our filtering and monitoring controls.

26.4 Addressing Online Risks:

We acknowledge that some students may misuse their mobile and smart technology to engage in harmful activities such as cyberbullying, sexting, or accessing inappropriate content. To address these risks, we prioritise education and awareness among our students and staff. We conduct regular workshops, seminars, and training sessions on online safety, digital citizenship, and responsible internet use through personal development in tutorials and on their programme of study. The College offers themed weeks, and this includes safety online.

26.5 Reporting Mechanism:

We foster an open and supportive environment where students feel comfortable reporting any concerns they may have regarding online safety. We have established a clear reporting mechanism through which students can share their experiences or report incidents of cyberbullying, harassment, or any other online threats.

26.6 Transparency and Communication with Parents and Carers:

We recognise the importance of transparent communication with parents and carers to foster a safe remote education experience for our students. We keep parents and carers informed about our online safety measures, including filtering and monitoring on the IT network during open events and through course tutors. We have recently launched a parent portal to also add links and communications.

Regular communications with parents and carers include updates on the systems we have in place

to protect students while they engage in remote learning. We also provide information about the online platforms, such as Moodle and Teams, and resources used for remote education.

26.7 Interactions During Remote Education:

We understand that parents and carers may be concerned about their children's online interactions during remote education. To address these concerns, we ensure clear communication about online interactions within the college's virtual learning environment. Students have an induction with the Digital learning team to understand how to behave using Moodle and MS Teams.

Parents and carers are informed about the channels and platforms where their children will interact with college staff, instructors, and fellow students. This transparency helps parents and carers feel confident that their children are engaging in safe and productive interactions while participating in remote education.

26.8 Information Security

It is our responsibility to ensure that appropriate security protection procedures, including IAM, are in place and regularly reviewed to stay ahead of evolving cyber-crime technologies. To achieve this, we will follow guidance from reputable sources to enhance our e-security and meet the Cyber security standards for schools and colleges.

Protecting sensitive data and information is paramount in our commitment to online safety. We implement robust security measures to safeguard our college's digital assets, including student records, staff information, and intellectual property. This includes encryption protocols for data transmission, regular data backups (including Cloud), and secure storage practices. We have MFA in place with varying rules on location based access too. Further information can be found in our aforementioned IT Security Policy.

26.9 Security Reviews:

We recognise that the threat landscape is constantly evolving, and cyber-criminals are becoming more sophisticated. To maintain a proactive stance against potential threats, we conduct periodic security reviews. These reviews will assess the effectiveness of our existing security measures, identify vulnerabilities, and implement necessary enhancements to fortify our information security defences. We gain external verification through audits and Cyber Essentials accreditation.

26.10 Cyber Security Standards for Schools and Colleges - GOV.UK:

We are committed to meeting the Cyber security standards for schools and colleges as provided by GOV.UK. Adhering to these standards will not only enhance our information security posture but also demonstrate our commitment to safeguarding our systems, staff, and students against cyber-attacks. We will work diligently to meet and exceed these standards to maintain the highest level of online safety.

Cyber security is a shared responsibility that involves all stakeholders within our college community. We will utilise guidance available at NCSC.GOV.UK, which covers broader considerations for governors. This guidance will help create a collective understanding of cyber security risks and the role each member plays in promoting a secure digital environment.

26.11 Use of school or college premises for non-school/college activities

As the College hires out its facilities/premises to organisations or individuals (for example to community groups, sports associations, and service providers to run community or extra-curricular activities) we ensure that appropriate arrangements are in place to keep children safe.

In this case the College seeks 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. This applies regardless of whether or not the children who attend any of these services or activities are children who attend the college. From September 2023 the College will ensure that safeguarding requirements are included in any transfer of control agreement (i.e. lease or hire agreement) as a condition of use and occupation of the premises; and that failure to comply with this would lead to termination of the agreement.

27.0 Safer Recruitment - General Key Messages

The College fully adheres to guidance [Working together to safeguard children - GOV.UK \(www.gov.uk\)](https://www.gov.uk) and [Keeping children safe in education 2023 \(publishing.service.gov.uk\)](https://publishing.service.gov.uk). SDC endeavor to prevent people who pose a risk of harm from working with children by adhering to statutory responsibilities to check staff who work with children, taking proportionate decisions on whether to ask for any checks beyond what is required; and ensuring volunteers/work experience are appropriately supervised. Where necessary barred list checks will be undertaken.

The College follows part 3 of 'Keeping Children Safe in Education' (KCSiE) and pays full regard to 'Safer Recruitment' requirements including but not limited to:

28.0 Recruitment and Selection Procedures

The College has recruitment and selection procedures which are reviewed by the Head of People and DSL who ensures that they take account of the following:

- They apply to staff, contractors, volunteers, work experience, placements and regular contractors who may work with children, young people or vulnerable adults.
- The post or role is clearly defined in the job description.
- The key selection criteria for the post or role should be identified from the person specification.
- Vacancies are advertised widely in order to ensure a diversity of applicants. Documentary evidence is required of academic/vocational qualifications.
- All recruitment materials will include reference to the colleges commitment to safeguarding and promoting the wellbeing of student
- Professional references are obtained for new starters.
- Previous employment history is verified and ensuring that a candidate has the health and physical capacity for the job,
- DBS and Children's barred list checks are carried out (maintain sensitive and confidential use of the applicant's disclosure)
- A variety of selection techniques is used (e.g. qualifications, previous experience, interview, reference checks, teaching session, skills tests and aptitude tests).
- The application form includes an explanation that the post is exempt from the Rehabilitation of Offenders act and therefore all convictions, cautions and bind overs including those regarded as "spent" must be declared. Providing false information or failing to declare convictions, bind overs and cautions is an offence and could result in summary dismissal if the applicant was selected for the post.
- Specific safeguarding and child protection questions are asked at interview.
- Clear Safeguarding and Child Protection statements of commitment are included on all recruitment advertisements and job descriptions.
- All volunteers will be risk assessed for suitability.
- Evidence of all checks are recorded on the Single Central Record.
- verifying candidates' identity and academic or vocational qualifications
- Right to Work
- any further checks as appropriate to gain all the relevant information to enable checks on suitability to work with children, including online searches.
- Where the College allows an individual to start work in regulated activity relating to children before the DBS certificate is available, the College will ensure that the individual is appropriately supervised and that all other checks are conducted, including a separate children's barred list check.

In relation to students;

- Ask applicants on the College application form if they have relevant previous convictions.
- Refer any student who has relevant convictions or has been identified as being a risk to the College Risk Assessment Panel (chaired by the Designated Safeguarding Lead - Kelly Sooben)

a potential risk to the safety of others. The panel will make decisions on their admission to the college with advice from Torbay Safeguarding Children Board and Public Protection Team.

29.0 Allegations Against Staff

Allegations of abuse made against teachers and other staff, including supply/agency staff & volunteers. The College will follow the principals detailed in KCSIE 2023

Concerns or allegations that may meet the harm threshold

Duties as an employer and an employee

The College has a duty of care to their employees. The College will ensure they provide effective support for anyone facing an allegation and provide the employee with a named contact if they are suspended.

The procedures apply to all staff, whether teaching, administrative, management or support, as well as to volunteers/work experience. They should be used in respect of all cases in which it is alleged that a teacher or member of staff 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.

The last bullet point above includes behaviour that may have happened outside of school or college, that might make an individual unsuitable to work with children, this is known as transferable risk

This relates to members of staff, supply staff and volunteers who are currently working at the High school or College regardless of whether the school or college is where the alleged abuse took place. Allegations against a teacher who is no longer teaching should be referred to the police. Historical allegations of abuse should also be referred to the police.

Every effort will be made to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered.

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

It is essential that any allegation of abuse made against a teacher or other member of staff or volunteer in college is dealt with very quickly, in a fair and consistent way that provides effective protection for the child and at the same time supports the person who is the subject of the allegation.

The framework for managing cases of allegation of abuse against people who work with young people is set out in 'Keeping Children Safe in Education September 2023 which provides an overview.

South Devon College procedure follows these procedures as stated below:

There are two aspects to consider when an allegation is made:

- Looking after the welfare of the child - the designated safeguarding lead (or a deputy) is responsible for ensuring that the child is not at risk and referring cases of suspected abuse to the local authority children's social care as described in Part one of this guidance.
- Investigating and supporting the person subject to the allegation - the DSL should discuss with the LADO, the nature, content and context of the allegation, and agree a course of action.

Receiving an Allegation of Abuse

At SDC we recognise the possibility that adults working in the college may harm children. Any concerns about the conduct of other adults in the school should be dealt with as follows:

- a) The allegation should be reported immediately to the Designated Safeguarding Lead who will report this to the Principal unless the Principal is the person against whom the allegation is made, in which case the report should be made to the Designated Safeguarding Governor. The DSL / or relevant Assistant Principal should:
 - i. Obtain written details of the allegation from the person who received it and ensure that they are signed and dated.
 - ii. Record information about times, dates, locations and names of potential witnesses.
- b) In the first instance the DSL will immediately discuss the allegation with the LADO.
- c) The purpose of an initial discussion is for the LADO and the DSL to consider the nature, content and context of the allegation and agree a course of action. The LADO may ask the DSL to provide or obtain relevant additional information, such as previous history, whether the child or their family have made similar allegations previously and the individual's current contact with children. There may be situations when the DSL will want to involve the police immediately, for example if the person is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. Where there is no such evidence, the DSL should discuss the allegations with the LADO in order to help determine whether police involvement is necessary.
- d) The initial sharing of information and evaluation may lead to a decision that no further action is to be taken in regard to the individual facing the allegation or concern; in which case this decision and a justification for it should be recorded by both the DSL and the LADO, and agreement reached on what information should be put in writing to the individual concerned and by whom. The DSL should then consider with the LADO what action should follow both in respect of the individual and those who made the initial allegation.
- e) Individuals will:
 - i. be informed of concerns or allegations as soon as possible & given an explanation of the likely course of action, unless there is an objection by the children's social care services or the police.
 - ii. The DSL should inform the accused person about the allegation after consulting the LADO. It is extremely important that the DSL provides them with as much information as possible at that time.
 - iii. However, where a strategy discussion is needed, or police or children's social care services need to be involved, the DSL should not do that until those agencies have been consulted and have agreed what information can be disclosed to the accused. Employers must consider carefully whether the circumstances of a case warrant a person being suspended from contact with children at the school or college or whether alternative arrangements can be put in place until the allegation or concern is resolved. The purpose of a strategy discussion and those likely to be involved is described in [Working Together to Safeguard Children](#).
 - iv. The individual will be advised to contact their trade union representative if they have one, or a colleague for support. The College has duty of care to their employees. They will ensure they provide effective support for anyone facing an allegation and provide them with a named contact if they are suspended. Where the college are not the employer of an individual they still have responsibility to ensure allegations are dealt with appropriately and that they liaise with relevant parties (this includes agency/ supply teachers and volunteers, It is essential that any allegation of abuse made against a teacher or other member of staff or volunteer in a

school or college is dealt with very quickly, in a fair and consistent way that provides effective protection for the child and, at the same time supports the person who is the subject of the allegation.

- f) The DSL shall keep a written record of the action taken in connection with the allegation. The DSL will appoint a named representative from the people team to keep the person who is the subject of the allegation informed of the progress of the case and consider what other support is appropriate for the individual.
- g) If appropriate, a Senior Post Holder of the College may suspend the employee, whilst an investigation is carried out.

Wherever possible the DSL (Investigating Officer) or designate will meet with the employee to discuss the need for, and nature of, the investigation before the investigation takes place.

An investigation will be carried out by the DSL as efficiently and quickly as possible to cause minimal disruption to the college. When employees are suspended, the College will keep them informed of both the progress of their case and current work-related issues.

- h) Parents or carers of a child or children involved will be told about the allegation as soon as possible if they do not already know of it. However, where a strategy discussion is required, or police or children's social care services need to be involved, the DSL will not do so until those agencies have been consulted and have agreed what information can be disclosed to the parents or carers.

Parents or carers will be kept informed about the progress of the case and told the outcome where there is not a criminal prosecution, including the outcome of any disciplinary process.

Parents and carers should also be made aware of the prohibition on reporting or publishing allegations about teachers in section 141F of the Education Act 2002 (see below). If parents or carers wish to apply to the court to have reporting restrictions removed, they should be told to seek legal advice.

- i) In cases where a child may have suffered significant harm, or there may be a criminal prosecution, children's social care services, or the police as appropriate, should consider what support the child or children involved may need.

If an allegation is made, the college will make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered. The Education Act 2011 introduced reporting restrictions preventing the publication of any material that may lead to the identification of a teacher who has been accused by, or on behalf of, a pupil from the same school or college (where that identification would identify the teacher as the subject of the allegation). The reporting restrictions apply until the point that the accused person is charged with an offence

It is in everyone's interest to resolve cases as quickly as possible consistent with a fair and thorough investigation.

30.0 Suspension of Staff

When the Senior Post Holder is of the view that an employee may have been guilty of gross misconduct, or that because of some other good and urgent cause, the continuing attendance of the employee at the College cannot be permitted, the Senior Post Holder may suspend the employee from duty pending an investigation and the holding of a formal disciplinary hearing. A suspension risk assessment will be undertaken.

Such a suspension should only be imposed after careful consideration, and it should be made clear to the employee that it is not considered a disciplinary act.

If the Senior Post Holder decides to suspend an employee from duty, he/she shall confirm the suspension

in writing, with reasons, immediately.

An employee who is suspended from duty shall, throughout the period of suspension, continue to be entitled to their full pay.

31.0 The Disciplinary Investigation

The disciplinary investigation should be conducted in accordance with the existing staff disciplinary procedures.

The member of staff should be informed of:

- the disciplinary charge against them
- their entitlement to be accompanied or represented by a trade union representative or friend.
- College reserves the right to remove an employee's access to college IT equipment, devices and buildings on commencement of disciplinary proceedings. In extreme circumstances the college reserves the right to search an employee's belongings or work area/location if necessary.

Where the member of staff has been suspended and no disciplinary action is to be taken, the suspension should be lifted immediately, and arrangements made for the member of staff to return to work. It may be appropriate to offer counselling and advise medical help. The child, children or young person making the allegation and/or their parents should be informed of the outcome of the investigation and proceedings. This should occur prior to the return to College of the member of staff (if suspended).

The Principal (or designated person) should give consideration to what information should be made available to the general population of the College. If on conclusion of the case the college ceases to use the person's services, or the person ceases to provide his or her services, the college should consult the local authority designated officer about whether a referral to Department for Education / Disclosure and Barring Service is required. If a referral is appropriate the report should be made within one month.

There is a legal requirement for employers to make a referral to the DBS where they think that an individual has engaged in conduct that harmed (or is likely to harm) a child; or if a person otherwise poses a risk of harm to a child. (KCSIE 2023)

32.0 Allegation outcomes

The following definitions will be used when determining the outcome 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
- **False:** there is sufficient evidence to disprove the allegation
- **Unsubstantiated:** there is insufficient evidence to either to prove or disprove the allegation. The term, therefore, does not imply guilt or innocence.
- **Unfounded:** to reflect cases where there is no evidence or proper basis which supports the allegation being made.

If the allegation is substantiated and the person is dismissed; resigns, or otherwise ceases to provide his or her services, or the College ceases to use the person's services, the DSL will consider whether to refer the matter to the TRA to consider whether the individual should be prohibited from teaching.

There is a legal requirement for employers to make a referral to the DBS where they consider an individual has engaged in conduct that harmed (or is likely to harm) a child; or if a person otherwise poses a risk of harm to a child. This referral will be undertaken by the DSL and the Head of People.

The police should inform the LADO and the employer immediately when a criminal investigation and any subsequent trial are complete, it is decided to close an investigation without charge, or it is decided not to continue to prosecute after the person has been charged. In those circumstances, during the joint assessment meeting the LADO will discuss with the DSL whether any further action, including disciplinary action, is appropriate and, if so, how to proceed. The information provided by the police and/or local authority children's social care should also inform that decision. The options will depend on the circumstances of the case and the consideration should take into account the result of the police investigation or the trial, as well as the different standard of proof required in disciplinary and criminal proceedings.

If an allegation is determined to be unsubstantiated, unfounded, false or malicious, the LADO and the DSL will consider whether the child and/or the person who has made the allegation is in need of help or may have been abused by someone else and this was a cry for help. In such circumstances, a referral to local authority children's social care may be appropriate. If an allegation is shown to be deliberately invented or malicious, the college, will consider whether any disciplinary action is appropriate against the individual who made it.

33.0 Record keeping

Details of allegations following an investigation that are found to have been malicious or false will be removed from personnel records unless the individual gives their consent for retention of the information. However, for all other allegations, i.e. substantiated, unfounded and unsubstantiated it is important that the following information is kept on the file of the person accused a clear and comprehensive summary of the allegation, details of how the allegation was followed up and resolve, a note of any action taken, decisions reached, and the outcome i.e. substantiated, unfounded or unsubstantiated, a copy provided to the person concerned, where agreed by local authority children's social care or the police, and a declaration on whether the information will be referred to in any future reference.

The purpose of the record is to enable accurate information to be given in response to any future request for a reference. It will provide clarification in cases where future DBS checks reveal information from the police about an allegation that did not result in a criminal conviction and it will help to prevent unnecessary re-investigation if, as sometimes happens, an allegation re-surfaces after a period of time.

All other records will be retained at least until the accused has reached normal pension age or for a period of 10 years from the date of the allegation if that is longer.

34.0 Concerns or allegations that do not meet the harm threshold

The term 'low-level' concern does not mean that it is insignificant. A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' - that an adult working in or on behalf of the school or college may have acted in a way that:

- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work and
- does not meet the harm threshold or is otherwise not serious enough to consider a referral to the LADO

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

- being over friendly with children
- having favourites
- taking photographs of children on their mobile phone, contrary to school policy
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door
- humiliating children.

All low-level concerns should be shared initially with the DSL or DDSs.

All low-level concerns will be recorded in writing. The record will include details of the concern, the context in which the concern arose, and action taken. The name of the individual sharing their concerns

will also be noted, if the individual wishes to remain anonymous then that should be respected as far as reasonably possible

35.0 Monitoring Effectiveness

Where an allegation has been made against a member of staff, the Designated Governor, together with the DSL, should, at the conclusion of the investigation and any disciplinary procedures, consider whether there are any matters arising from it that could lead to the improvement of the College's procedures and/or policies, and/or which should be drawn to the attention of the LADO. Consideration should also be given to the training needs of staff.

The procedures need to be applied with common sense and judgement. It is important to ensure that even allegations that appear less serious are seen to be followed up and taken seriously, and that they are examined objectively by someone independent of the college. The local authority designated officer should be informed of all allegations that come to the college's attention and appear to meet the criteria.

Where it is clear that an investigation by the police or children's social care services is unnecessary, or the strategy discussion or initial evaluation decides that is the case, the designated officer(s) should discuss the next steps with the case manager. In those circumstances, the options open to the college depend on the nature and circumstances of the allegation and the evidence and information available. This will range from taking no further action to dismissal or a decision not to use the person's services in future. Suspension will not be the default position: an individual should be suspended only if there is no reasonable alternative.

Approved by		Signature	Date
Author:	Kelly Sooben		September 2023
Owner:	Kelly Sooben		September 2023
Chair of Governing Body:	Jane Viner		November 2023
Next Review due	Sept 2024		

Appendix - 1 Statutory Guidance

Statutory Guidance 2023

[Keeping children safe in education 2023](https://www.gov.uk/government/publications/keeping-children-safe-in-education-2023)
(publishing.service.gov.uk) [Working together to safeguard children - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/working-together-to-safeguard-children)

About this guidance: This guidance sets out how organisations and individuals should work together to safeguard and promote the welfare of children and how practitioners should conduct the assessment of children.

[Keeping children safe in education-Statutory guidance for schools and colleges-2023](https://www.gov.uk/government/publications/keeping-children-safe-in-education-statutory-guidance-for-schools-and-colleges-2023)
About this guidance: This is statutory guidance from the Department for Education issued under Section 175 of the Education Act 2002, the Education (Independent School Standards) Regulations 2014 and the Education (Non-Maintained Special Schools) (England) Regulations 2011. Schools and colleges must have regard to it when carrying out their duties to safeguard and promote the welfare of children.

Key points: This legislation sets out our duties in relation to Child protection, significant safeguarding matters, safer recruitment and looked after children. It is the key piece of legislation that forms South Devon College Policies and procedures.

[Prevent Duty Guidance-for England and Wales](https://www.gov.uk/government/publications/prevent-duty-guidance-for-england-and-wales) ¹(Issued 12 March 2015 - updated 1 April 2021)

About this guidance: The Prevent strategy, published by the Government in 2011, is part of the overall counter-terrorism strategy, CONTEST. The aim of the Prevent strategy is to reduce the threat to the UK from terrorism by stopping people becoming terrorists or supporting terrorism. In the Act this has simply been expressed as the need to “prevent people from being drawn into terrorism”. The 2011 Prevent strategy has three specific strategic objectives: respond to the ideological challenge of terrorism and the threat we face from those who promote it; prevent people from being drawn into terrorism and ensure that they are given appropriate advice and support; and work with sectors and institutions where there are risks of radicalisation that we need to address. Education is one of those sectors.

Key points: The guidance sets out our duty under the act and our responsibilities to work in partnership with other key agencies to prevent people from being drawn into terrorism.

Further important guidance:

Sharing nudes and semi nudes:

<https://www.gov.uk/government/publications/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people/sharing-nudes-and-semi-nudes-how-to-respond-to-an-incident-overview>

[Sharing nudes and semi-nudes: advice for education settings working with children and young people - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people)

- 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 to report FGM.

Appendix 2 - Useful Web-links and Documents

Designated Senior Lead:

Kelly Sooben, Vice Principal People & Resources - kellysooben@southdevon.ac.uk

Tel: 07805162193

Deputy Designated Lead:

Rhiannon Gray – rhiannongray@southdevon.ac.uk; tel: 01803 540321/ 07900 287135

Brittany May Benton – brittanymaybenton@southdevon.ac.uk; tel: 01803 540321/ 07778 019791

Useful Websites

Independent Safeguarding Authority

www.isa-gov.org.uk

Useful local child protection contacts:

- Child Protection – Torbay Hub (Children's Services) 01803 208100
- LADO/Local Safeguarding Board - 01803 208955
- Training providers – Local Safeguarding Childrens Board <http://www.torbaysafeguarding.org.uk/>

Multi-Agency Safeguarding Hub (MASH) - 01803 208100 (TORBAY)

(TORBAY) Emergency Duty Team Out of Hours 0300456 4876

Multi-Agency Safeguarding Hub (MASH) - 03451551071 (DEVON)

The Multi-Agency Safeguarding Hub is a new service developed in conjunction with Devon & Cornwall Constabulary and other key partners and provides a new approach to intelligence and decision making with regards to adult and children safeguarding.

MASH will provide the highest level of knowledge and analysis of all known intelligence and information across the safeguarding children and adult's partnerships in Torbay to ensure all safeguarding activity and intervention is timely, proportionate and effective.

Advice on identifying children who are affected by domestic abuse and how they can be helped is available at:

- NSPCC- UK domestic-abuse Signs Symptoms Effects
- Refuge what is domestic violence/effects of domestic violence on children
- Safe lives: young people and domestic abuse

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

Appendix 3 - College Policy/Procedures and Documents

College website Safeguarding Page <https://www.southdevon.ac.uk/about-us/safeguarding>

College website Policies and Downloads Page: <https://www.southdevon.ac.uk/about-us/policies-and-downloads>

College Procedures and Documents (Internal)

College intranet Safeguarding Page

[Safeguarding and Wellbeing - Home \(sharepoint.com\)](#) (access for staff only via South Devon Central Hub)

Child Protection: All information is on the staff pages intranet under safeguarding

Safeguarding & Wellbeing Support Flow Chart

Level 1. Low level Intervention

Initial consultation appointment after referral is made. 30 mins face-to-face / on the phone

Learner to complete self-assessment of referral

Referral to internal support (Helpzone/ Nurse/ SENDCO/ behaviour officer)

Referral to external support (Websites, helplines, apps)

Coping strategies/ support identified
Information pack given and referral closed

Examples of referrals for this category:

Attendance
Anger management
Poor behaviour
College issues
Exam Stress
Unemployment
Medical
Online Safety
Pregnancy
Unemployment
Financial issues
Sexting

Level 2. Medium level Intervention

Weekly 30 minute sessions (max of 6)
Appointment card given with contact details and named Wellbeing Officer

Wellness Recovery Action Plan completed to encourage learner to self-manage by developing coping strategies within action plan – this can be shared with tutors, highlighting support is in place.

Weekly meetings to review progress - what is working well, what is not working and any changes (further support/ different coping techniques)

Close referral after 6 weeks- if not possible please bring learner to next team meeting to discuss support strategies

Examples of referrals for this category:

Bereavement/ critical illness
Sexual or criminal exploitation
Drug or alcohol misuse
Mental ill health with no coping strategies or support
Bullying
Gambling addiction

Level 3. High Level Intervention/Crisis support

**Safeguarding process followed
Liaise with designated Safeguarding Lead or Deputy Lead**

Immediate referral to counselling/ external support (TESS/ MASH/ Police involvement etc.)

Follow up appointments as often and for as long as needed
follow up sessions to ensure safeguarded – daily contact either face-to-face or by phone depending on needs

Examples of referrals for this category:

Safeguarding
Prevent
Suicidal thoughts
Suicidal attempts
Self – harm
Homelessness
Domestic violence
Emotional or Physical Abuse
Neglect
Criminal behaviour
Missing from home

Level of risk / further concerns

Appendix 5 - Female Genital Mutilation

Female genital mutilation refers to procedures that intentionally alter or cause injury to the female genital organs for non-medical reasons. The practice is illegal in the UK.

FGM typically takes place between birth and around 15 years old; however, it is believed that the majority of cases happen between the ages of 5 and 8.

Risk factors for FGM include:

- low level of integration into UK society
- mother or a sister who has undergone FGM
- girls who are withdrawn from PSHE
- visiting female elder from the country of origin
- being taken on a long holiday to the country of origin
- talk about a 'special' procedure to become a woman

Symptoms of FGM

FGM may be likely if there is a visiting female elder, there is talk of a special procedure or celebration to become a woman, or parents wish to take their daughter out-of-school to visit an 'at-risk' country (especially before the summer holidays), or parents who wish to withdraw their children from learning about FGM.

Indications that FGM may have already taken place may include:

- difficulty walking, sitting or standing and may even look uncomfortable.
- spending longer than normal in the bathroom or toilet due to difficulties urinating.
- spending long periods of time away from a classroom during the day with bladder or menstrual problems.
- frequent urinary, menstrual or stomach problems.
- prolonged or repeated absences from school or college, especially with noticeable behaviour changes (e.g. withdrawal or depression) on the girl's return
- reluctance to undergo normal medical examinations.
- confiding in a professional without being explicit about the problem due to embarrassment or fear.
- talking about pain or discomfort between her legs

The Serious Crime Act 2015 sets out a duty on professionals (including teachers) to notify police when they discover that FGM appears to have been carried out on a girl under 18. In schools, this will usually come from a disclosure.

Teachers must personally report to the police cases where they discover that an act of FGM appears to have been carried out; and discuss any such cases with the safeguarding lead and children's social care. The duty does not apply in relation to at risk or suspected cases.

So-called 'honour-based' violence (HBV) encompasses crimes which have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation (FGM), forced marriage, and practices such as breast ironing. All forms of so called HBV are abuse (regardless of the motivation) and should be handled and escalated as such.

Where staff are concerned that a child might be at risk of HBV, they must contact the Designated Safeguarding Lead as a matter of urgency.

Appendix 6 - Supply Teachers and Agency Staff

In some circumstances schools and colleges will have to consider an allegation against an individual not directly employed by them, where its disciplinary procedures do not fully apply, for example, supply teachers provided by an employment agency or business (referred to in this section as 'the agency').

Whilst schools and colleges are not the employer of supply teachers, they should ensure allegations are dealt with properly. In no circumstances should a school or college decide to cease to use a supply teacher due to safeguarding concerns, without finding out the facts and liaising with the local authority designated officer (LADO) to determine a suitable outcome.

Governing bodies and proprietors should discuss with the agency whether it is appropriate to suspend the supply teacher, or redeploy them to another part of the school, whilst they carry out their investigation. Agencies should be fully involved and co-operate in any enquiries from the LADO, police and/or children's social services. The school or college will usually take the lead because agencies do not have direct access to children or other school staff, so they will not be able to collect the facts when an allegation is made, nor do they have all the relevant information required by the LADO as part of the referral process.

Supply teachers, whilst not employed by the school or college, are under the supervision, direction and control of the governing body or proprietor when working in the school or college. They should be advised to contact their trade union representative if they have one, or a colleague for support. The allegations management meeting which is often arranged by the LADO should address issues such as information sharing, to ensure that any previous concerns or allegations known to the agency are taken into account by the school during the investigation.

When using an agency, schools and colleges should inform the agency of its process for managing allegations. This should include inviting the agency's human resource manager or equivalent to meetings and keeping them up to date with information about its policies.

[Emergency planning and response for education, childcare, and children's social care settings \(publishing.service.gov.uk\)](https://publishing.service.gov.uk)

Security-related incidents in schools and colleges

A school/college's security policy should complement their safeguarding policy, particularly where it puts in place measures to protect students; and address the threat of serious violence. It should form part of your suite of policies to ensure the health, safety and well-being of students and staff including in relation to the online environment.

Appendix 7 – Remote Education and Keeping Children Safe Online

Remote Education: keeping children safe online - All schools and colleges should continue to consider the safety of their children when they are asked to work online. The starting point for online teaching should be that the same principles as set out in the school's or college's staff behaviour policy (sometimes known as a code of conduct) should be followed. This policy should amongst other things include acceptable use of technologies, staff pupil/student relationships and communication including the use of social media. The policy should apply equally to any existing or new online and distance learning arrangements which are introduced.

Schools and colleges should, as much as is reasonably possible, consider if their existing policies adequately reflect that some children (and in some cases staff) continue to work remotely online. As with the child protection policy, in some cases an annex/addendum summarising key coronavirus related changes may be more effective than re-writing/re-issuing the whole policy.

The principles set out in the [guidance for safer working practice for those working with children and young people in education settings](#) published by the Safer Recruitment Consortium may help schools and colleges satisfy themselves that their staff behaviour policies are robust and effective. In some areas schools and colleges may be able to seek support from their local authority when planning online lessons/activities and considering online safety.

Schools and colleges should continue to ensure any use of online learning tools and systems is in line with privacy and data protection requirements.

An essential part of the online planning process will be ensuring children who are being asked to work online have very clear reporting routes in place so they can raise any concerns whilst online. As well as reporting routes back to the school or college this should also signpost children to age-appropriate practical support from the likes of:

- [Childline](#) - for support
- [UK Safer Internet Centre](#) - to report and remove harmful online content
- [CEOP](#) - for advice on making a report about online abuse

Schools and colleges are likely to be in regular contact with parents and carers. Those communications should continue to be used to reinforce the importance of children being safe online and parents and carers are likely to find it helpful to understand what systems schools and colleges use to filter and monitor online use. It will be especially important for parents and carers to be aware of what their children are being asked to do online, including the sites they will be asked to access and be clear who from the school or college (if anyone) their child is going to be interacting with online.

Parents and carers may choose to supplement the school or college online offer with support from online companies and in some cases individual tutors. In their communications with parents and carers, schools and colleges should emphasise the importance of securing online support from a reputable organisation/individual who can provide evidence that they are safe and can be trusted to have access to children.

Support for parents and carers to keep their children safe online includes:

- [Thinkuknow](#) provides advice from the National Crime Agency (NCA) on staying safe online.
- [Parent info](#) is a collaboration between Parentzone and the NCA providing support and guidance for parents from leading experts and organisations.
- [Childnet](#) offers a toolkit to support parents and carers of children of any age to start discussions about their online life, to set boundaries around online behaviour and technology use, and to find out where to get more help and support.
- [Internet Matters](#) provides age-specific online safety checklists, guides on how to set parental controls on a range of devices, and a host of practical tips to help children get the most out of their digital world.
- [London Grid for Learning](#) has support for parents and carers to keep their children safe online, including tips to keep primary aged children safe online.
- [Net-aware](#) has support for parents and carers from the NSPCC and O2, including a guide to social networks, apps and games.
- [Let's Talk About It](#) has advice for parents and carers to keep children safe from online radicalisation.
- [UK Safer Internet Centre](#) has tips, advice, guides and other resources to help keep children safe online, including parental controls offered by home internet providers and safety tools on social networks and other online services.

Government has also provided:

[Guide for parents and carers child online safety](#) includes security and privacy settings, blocking unsuitable content, and parental controls.

The department encourages schools and colleges to share this support with parents and carers.

Appendix 8 - Harmful Sexual Behaviour

Sexual violence and sexual abuse can happen anywhere, and all staff working with children are advised to maintain an attitude of 'it could happen here'. Schools and colleges should be aware of and respond appropriately to all reports and concerns about sexual violence and/or sexual harassment both online and offline, including those that have happened outside of the school/college. The designated safeguarding lead (or deputy) is likely to have a complete safeguarding picture and be the most appropriate person to advise on the initial response by the school or college. Important considerations will include:

- The wishes of the victim in terms of how they want to proceed. This is especially important in the context of sexual violence and sexual harassment. Victims should be given as much control as is reasonably possible over decisions regarding how any investigation will be progressed and any support that they will be offered. This will however need to be balanced with the school's or college's duty and responsibilities to protect other children;
- The nature of the alleged incident(s), including whether a crime may have been committed and/or whether HSB has been displayed;
- The ages of the children involved;
- The developmental stages of the children involved;
- Any power imbalance between the children. For example, is/are the alleged perpetrator(s) significantly older, more mature, confident and well-known social standing? Does the victim have a disability or learning difficulty?
- If the alleged incident is a one-off or a sustained pattern of abuse (sexual abuse can be accompanied by other forms of abuse and a sustained pattern may not just be of a sexual nature);
- That sexual violence and sexual harassment can take place within intimate personal relationships between children;
- Importance of understanding intra familial harms and any necessary support for siblings following incidents;
- Are there ongoing risks to the victim, other children, adult students or school or college staff; and
- Other related issues and wider context, including any links to child sexual exploitation and child criminal exploitation.

As always when concerned about the welfare of a child, all staff should act in the best interests of the child. In all cases, schools and colleges should follow general safeguarding principles as set out throughout this guidance. **Immediate** consideration should be given as to how best to support and protect the victim and the alleged perpetrator(s) (and any other children involved/impacted

Sexual violence and sexual harassment can occur between two or more children of any age and sex, from primary through to secondary stage and into college. It can occur also through a group of children sexually assaulting or sexually harassing a single child or group of children. Sexual violence and sexual harassment exist on a continuum and may overlap; they can occur online and face-to-face (both physically and verbally) and are never acceptable. Schools and colleges should be aware of the importance of:

- Making clear that there is a **zero-tolerance** approach to sexual violence and sexual harassment, that it is **never** acceptable, and it will not be tolerated. It should never be

passed off as “banter”, “just having a laugh”, “a part of growing up” or “boys being boys”. Failure to do so can lead to a culture of unacceptable behaviour, an unsafe environment and in worst case scenarios a culture that normalises abuse, leading to children accepting it as normal and not coming forward to report it;

- Recognising, acknowledging, and understanding the scale of harassment and abuse and that even if there are no reports it does not mean it is not happening, it may be the case that it is just not being reported;
- Challenging physical behaviour (potentially criminal in nature) such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them.

Children who are victims of sexual violence and sexual harassment wherever it happens, may find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school or college. Whilst **any** report of sexual violence or sexual harassment should be taken seriously, staff should be aware it is more likely that girls will be the victims of sexual violence and sexual harassment and more likely it will be perpetrated by boys. Children with special educational needs and disabilities (SEND) are also three times more likely to be abused than their peers.

Ultimately, it is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe.

Sexual violence

It is important that schools and colleges are aware of sexual violence and the fact children can, and sometimes do, abuse other children in this way and that it **can happen both inside and outside of school/college**. When referring to sexual violence in this advice, we do so in the context of child-on-child sexual violence.

When referring to sexual violence we are referring to sexual offences under the Sexual Offences Act 2003 as described below:

Rape: A person (A) commits an offence of rape if: he intentionally penetrates the vagina, anus or mouth of another person (B) with his penis, B does not consent to the penetration and A does not reasonably believe that B consents.

Assault by Penetration: A person (A) commits an offence if: s/he intentionally penetrates the vagina or anus of another person (B) with a part of her/his body or anything else, the penetration is sexual, B does not consent to the penetration and A does not reasonably believe that B consents.

Sexual Assault: A person (A) commits an offence of sexual assault if: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents. (NOTE- Schools and colleges should be aware that sexual assault covers a very wide range of behaviour so a single act of kissing someone without consent or touching someone's bottom/breasts/genitalia without consent, can still constitute sexual assault.)

Causing someone to engage in sexual activity without consent: A person (A) commits an offence if: s/he intentionally causes another person (B) to engage in an activity, the activity is sexual, B does not consent to engaging in the activity, and A does not reasonably believe that B consents. (NOTE – this could include forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.)

What is consent? Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another, e.g. to vaginal but not anal sex or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity and each time activity occurs. Someone consents to vaginal, anal or oral penetration only if s/he agrees by choice to that penetration and has the freedom and capacity to make that choice.

- A child under the age of 13 can never consent to any sexual activity;
- The age of consent is 16
- Sexual intercourse without consent is rape.

Further information about consent can be found here: [Rape Crisis England & Wales - Sexual consent](#)

Sexual harassment

When referring to sexual harassment we mean ‘unwanted conduct of a sexual nature’ that can occur online and offline and both inside and outside of school/college. When we reference sexual harassment, we do so in the context of child-on-child sexual harassment. Sexual harassment is likely to: violate a child’s dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment.

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

- Sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names;
- Sexual “jokes” or taunting;
- Physical behaviour, such as: deliberately brushing against someone, interfering with someone’s clothes. Schools and colleges should be considering when any of this crosses a line into sexual violence – it is important to talk to and consider the experience of the victim;
- Displaying pictures, photos or drawings of a sexual nature;
- Upskirting (this is a criminal offence [136]); and
- Online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence. [137] It may include:
- Consensual and non-consensual sharing of nude and semi-nude images and/or videos. [138] Taking and sharing nude photographs of U18s is a criminal offence. [UKCIS Sharing nudes and semi-nudes: advice for education settings working with children and young people](#) provides detailed advice for schools and colleges;
- Sharing of unwanted explicit content;
- Sexualised online bullying;
- Unwanted sexual comments and messages, including, on social media;
- Sexual exploitation; coercion and threats; and
- Coercing others into sharing images of themselves or performing acts they’re not comfortable with online.

[The Voyeurism \(Offences\) Act 2019](#) which amends the Sexual Offences Act 2003 to make upskirting a specific offence of voyeurism. The Act came into force on 12 April 2019.

[Project deSHAME](#) from Childnet provides useful research, advice and resources regarding online sexual harassment.

Harmful sexual behaviour

Children’s sexual behaviour exists on a wide continuum, ranging from normal and developmentally expected to inappropriate, problematic, abusive and violent. Problematic, abusive and violent sexual behaviour is developmentally inappropriate and may cause developmental damage. A useful umbrella term is “harmful sexual behaviour” (HSB). The term has been widely adopted in child protection and is used in this advice. **HSB can occur online and/or face-to-face and can also occur simultaneously between the two.**

When considering HSB, both ages and the stages of development of the children are critical factors. Sexual behaviour between children can be considered harmful if one of the children is much older,

particularly if there is more than two years' difference or if one of the children is pre-pubescent and the other is not. However, a younger child can abuse an older child, particularly if they have power over them, for example, if the older child is disabled or smaller in stature. Confidential specialist support and advice on HSB is available from the specialist sexual violence sector.

- **Child Exploitation and Online Protection command:** [CEOP](#) is a law enforcement agency which aims to keep children and young people safe from sexual exploitation and abuse. Online sexual abuse can be reported on their website and a report made to one of its Child Protection Advisors;
- **The NSPCC** provides a helpline for professionals at 0808 800 5000 and help@nspcc.org.uk. The helpline provides expert advice and support for school and college staff and will be especially useful for the designated safeguarding lead (and their deputies);
- Support from **specialist sexual violence sector organisations** such as [Rape Crisis](#) or [The Survivors Trust](#);
- **The Anti-Bullying Alliance** has developed guidance for schools about [Sexual and sexist bullying](#).

Online: Schools and colleges should recognise that sexual violence and sexual harassment occurring online (either in isolation or in connection with face-to-face incidents) can introduce a number of complex factors. Amongst other things, this can include widespread abuse or harm across a number of social media platforms that leads to repeat victimisation. Online concerns can be especially complicated, and support is available from:

- **The UK Safer Internet Centre** provides an online safety helpline for professionals at 0344 381 4772 and helpline@saferinternet.org.uk. The helpline provides expert advice and support for school and college staff with regard to online safety issues;
- **Internet Watch Foundation:** If the incident/report involves sexual images or videos that have been made and circulated online, the victim can be supported to get the images removed by the [Internet Watch Foundation](#) (IWF);
- **Childline/IWF Report Remove** is a free tool that allows children to report nude or sexual images and/or videos of themselves that they think might have been shared online;
- **UKCIS Sharing nudes and semi-nudes advice:** [Advice for education settings working with children and young people](#) on responding to reports of children sharing non-consensual nude and semi-nude images and/or videos (also known as sexting and youth produced sexual imagery). Please see footnote 8 for further information;
- [Thinkuknow](#) from NCA-CEOP provides support for the children's workforce, parents and carers on staying safe online;
- LGFL ['Undressed'](#) provided schools advice about how to teach young children about being tricked into getting undressed online in a fun way without scaring them or explaining the motives of sex offenders.
- Online safety links:
 - [Appropriate Filtering - UK Safer Internet Centre](#)
 - [Appropriate Monitoring - UK Safer Internet Centre](#)
 - [Prevent duty guidance - GOV.UK \(www.gov.uk\)](#)