



# **2022/23 Child Protection and Safeguarding Policy for The HENLEY College**

Consistent with Keeping Children Safe in Education 2022



**Published December 2022, to be reviewed November 2023**

Date agreed and ratified by Governing Body on the 5<sup>th</sup> December 2022

The policy must be reviewed and updated at least annually and/or following any updates to national and local guidance and procedures

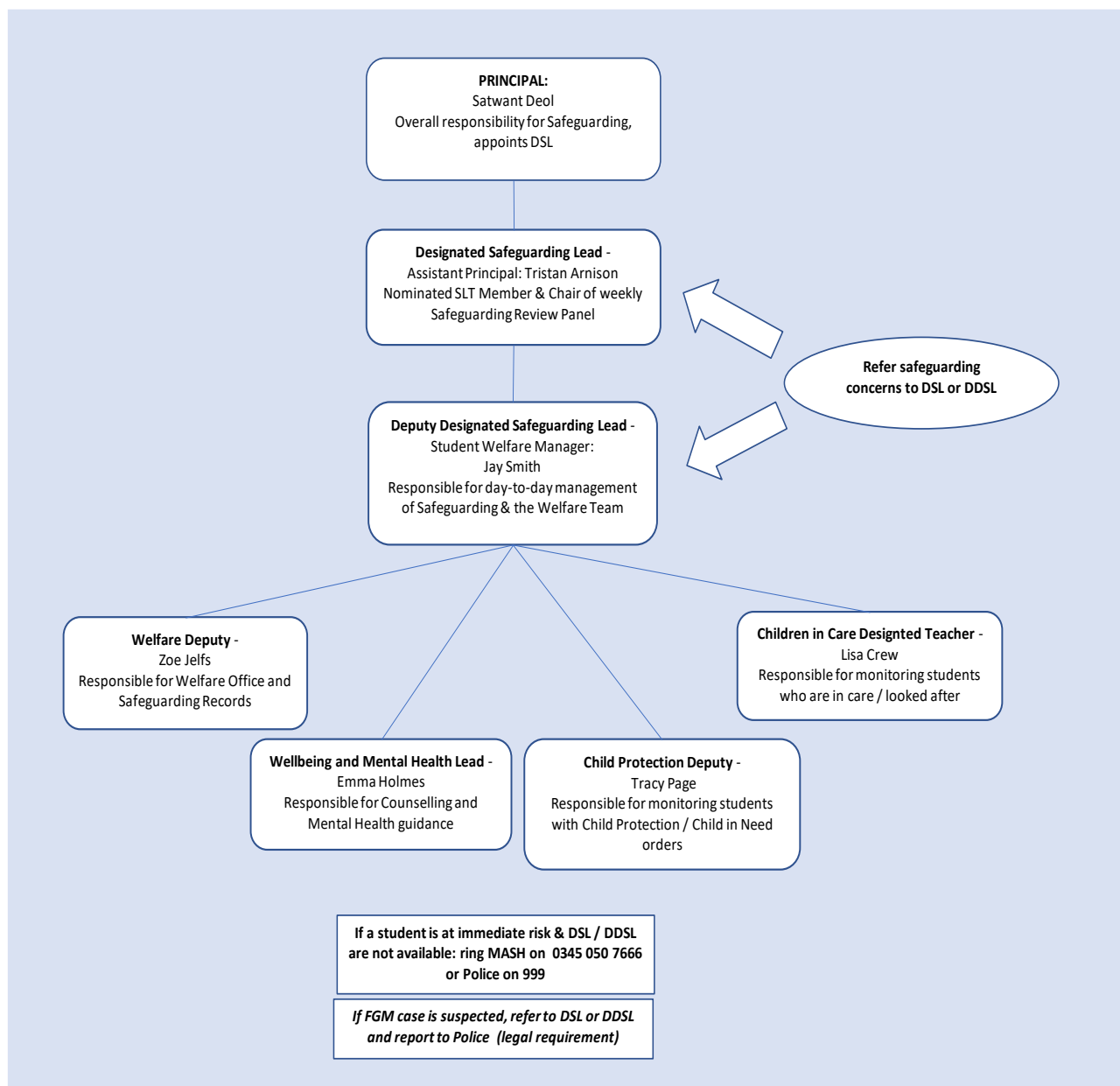
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Key Personnel	Name (s)	Contact details
Designated Safeguarding Lead (DSL)	Tristan Arnison	01491 634133 <a href="mailto:tarn@henleycol.ac.uk">tarn@henleycol.ac.uk</a>
Deputy DSL(s)	Jay Smith	01491 634086 <a href="mailto:iasm@henleycol.ac.uk">iasm@henleycol.ac.uk</a>
College's named 'Prevent' lead	Jay Smith	01491 634086 <a href="mailto:iasm@henleycol.ac.uk">iasm@henleycol.ac.uk</a>
Nominated Safeguarding Governor	James Lingard	<a href="mailto:jlin@henleycol.ac.uk">jlin@henleycol.ac.uk</a>
Chair of Governors	Mike Ashton	<a href="mailto:mash@henleycol.ac.uk">mash@henleycol.ac.uk</a>
Education Safeguarding Advisory Team / Local Authority Designated Officers (LADOs)	Jo Lloyd Donna Crozier Sandra Barratt Lorna Berry Becky Langstone (ESAT)	01865 810603 <a href="mailto:Lado.safeguardingchildren@oxfordshire.gov.uk">Lado.safeguardingchildren@oxfordshire.gov.uk</a>
Multi Agency Safeguarding Hub (MASH)		0345 050 7666
Out of hours Emergency Duty Team (EDT)		0800 833408
Police		101 or in emergencies 999

### Safeguarding Structure at The Henley College



# WHAT DO I DO IF I HAVE A SAFEGUARDING CONCERN?

**\*If a child is in imminent danger dial 999 immediately**



## WHY ARE YOU CONCERNED?

It is always better to share concerns than to do nothing.

Possible causes of concern:

- Appearance - unexplained marks on the body, injuries, expensive / unkempt clothes all of a sudden.
- Change in usual behaviour – quiet, withdrawn, acting out, angry.
- Challenging behaviour – inappropriate touching, repeatedly asking to leave the class, persistently playing with mobile phone, provoking other students.
- Suicidal or self-harming thoughts.
- Behaviour of staff towards students even if it's a 'low-level' concern (e.g. use of language, comments)

## WHAT SHOULD YOU DO?

Act immediately & record / share your concerns via the [wecare@henleycol.ac.uk](mailto:wecare@henleycol.ac.uk) or call us on 4444.

**\*Monitor your emails as a member of the safeguarding team may request further information.**

If urgent, call or speak to a member of the safeguarding team before sending the email.

We operate an open-door policy. Reach out if you need support.

When dealing with a student disclosure:

- Reassure the student.
- Use the student's own words where possible.
- Clarify concerns if necessary
- Use What? When? Who? How? Where? Once clarification is achieved, no further questions.

## WHAT WE WILL DO?

The SG team will assess the level of risk and allocate a worker:

- SG team will assess if the learner is at immediate risk of harm e.g. exploitation
- SG team will signpost or refer to other agencies if and when appropriate.
- In the event of an allegation against a member of staff, the Principal will contact the LADO (Local Authority Designated Officer) before carrying out an investigation.

If you are unhappy with the response:

Speak to the DSL directly or follow the college's complaints procedure. If you feel your concerns have not been addressed, follow the college's whistle blowing policy.

SG team will record the action taken in the learner's file. The students identified as vulnerable or at risk will be regularly reviewed at the weekly SG Panel Meeting.

Monitoring procedures:

- SG team must be clear about what we are monitoring (e.g. behaviour, appearance)
- Weekly SG meetings: Allocated workers will update on student risk (e.g. ability to attend college)
- Communication: Staff will be informed of action taken on a 'need to know' basis, recording this on CPOMS and asking curriculum staff for updates or informing them via the academic portal.

The Henley College recognises its responsibility for safeguarding and child protection.

## 1. INTRODUCTION

- 1.1. It is essential that everybody working in the College understands their safeguarding responsibilities. Everyone who comes into contact with students and families has a role to play in ensuring children and young people are safe from abuse, neglect exploitation and harm. Our College is committed to safeguarding students and aims to create a culture of vigilance. All staff should make sure that any decisions made are in the best interests of the student. While the term 'child' refers specifically to a young person under 18, the College nevertheless seeks to apply the core principles of KCSIE 2022 to all students studying at the college as far as possible.
- 1.2. Our students' welfare is our paramount concern. The governing body will ensure that our College will safeguard and promote the welfare of students and work together with agencies to ensure that our College has adequate arrangements to identify, assess and support those children who are suffering or where significant harm is suggested.

[What to do if you think a child is at risk of abuse or neglect - Oxfordshire Safeguarding Children Board \(oscb.org.uk\)](https://www.oscb.org.uk)

- 1.3. If allegation of harm is made against staff, the College will still refer to the Local Designated Officer even if the young person is over the age of 18 provided they joined the College when younger. If a student was 18 at the point of joining, the College will seek advice from the local adult safeguarding board.
- 1.4. This policy provides the basis for good practice within the College for Safeguarding work. It should be read in conjunction with the Oxfordshire Safeguarding Children's Board Safeguarding Policies and Procedures: [Contents \(proceduresonline.com\)](https://www.oscb.org.uk)  
  
These are in keeping with relevant national procedures and reflect what the partnership considers to be safe and professional practice in this context.
- 1.4. This policy applies to all members of staff in our College, including all permanent, temporary and support staff, governors, volunteers, contractors and external service or activity providers.

## 2. THE LEGAL FRAMEWORK

- 2.1. This policy and the accompanying procedure have been developed in accordance with the following statutory guidance and local safeguarding procedures:

*Working Together to Safeguard Children: A Guide to Inter-Agency Working to Safeguard and Promote the Welfare of Children, July 2018:* <https://www.gov.uk/government/publications/working-together-to-safeguard-children--2>

*Keeping Children Safe in Education: Statutory Guidance for Colleges and Colleges, September 2022:* [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1080047/KCSIE\\_2022\\_revised.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1080047/KCSIE_2022_revised.pdf)

## 3. ROLES AND RESPONSIBILITIES

- 3.1. The Principal has overall responsibility for safeguarding in the college and, in particular, for appointing a Designated Safeguarding Lead (DSL), meeting weekly with the DSL to review concerns and areas of risk, and, contacting the LADO in the event of allegations of harm against staff and appointing an investigating officer.

- 3.2. The College's Designated Safeguarding Lead (DSL) with designated responsibility for safeguarding is Tristan Arnison. The College has a Deputy Designated Safeguarding Lead, Jay Smith to ensure there is always appropriate cover for this role.
- 3.3. The **governing body** is collectively responsible for ensuring that safeguarding arrangements are fully embedded within the College's ethos and reflected in the College's day-to-day practice.
- 3.3. **All staff members, governors, volunteers, and external providers** know how to recognise signs and symptoms of abuse, how to respond to students who disclose abuse and what to do if they are concerned about a child.
- 3.4. Our College acknowledges the need to treat everyone equally, with fairness, dignity, and respect. Any discriminatory behaviours are challenged, and children are supported to understand how to treat others with respect. We also have a statutory duty to report and record any of the above incidents.
- 3.5. Our College and Governing body takes all reasonable action to limit children's exposure to the risks from the College's or college's IT system and ensure our College has appropriate filters and monitoring systems in place and regularly review their effectiveness. Current monitoring systems include Fortigate, Impero and Senso. All IT activity, including email and Teams chats, are logged and monitored for trigger terms.

#### 4. SUPPORTING STUDENTS

- 4.1. Our College will support all students by:

- ensuring the content of the curriculum includes social and emotional aspects of learning through our Personal and Professional Development Programme, as well as other curriculum contexts, and ensuring that students are taught about safeguarding so that they 'recognise when they are at risk and how to get help when they need it'.
- ensuring a comprehensive curriculum response to online safety, enabling students to learn about the risks of new technologies and social media and to use these responsibly.
- encouraging students to talk about feelings and deal assertively with pressures and ensuring that they are listened to; providing students with a range of appropriate adults to approach as needed.
- supporting students to feel safe, develop confidence and independence and increase the development of self-esteem and self-assertiveness while not condoning aggression or bullying.
- liaising and working together with other support services and those agencies involved in safeguarding children, including Early Help and preventative services:

<https://www.gov.uk/government/consultations/domestic-abuse-act-statutory-guidance>

<https://www.gov.uk/government/publications/promoting-children-and-young-peoples-emotional-health-and-wellbeing>

- considering intra-familial harms and any necessary support for siblings following a report of sexual violence and/or harassment.
- having behaviour policies that are aimed at supporting vulnerable students in the College. The behaviour policies outline measures to prevent bullying, including cyber-bullying, prejudice-based and discriminatory bullying.
- having clear procedures are in place for addressing and minimising the risk of child-on-child abuse, including harmful sexual behaviours, sexual violence, and sexual harassment.
- acknowledging the importance of 'contextual safeguarding' which considers wider environmental factors in a student's life that may be a threat to their safety and/or welfare:



[https://contextualsafeguarding.org.uk/Working together to safeguard children July 2018](https://contextualsafeguarding.org.uk/Working%20together%20to%20safeguard%20children%20July%202018)  
[KCSIE September 2022](#)

- alerting the authority if it is aware of any child being looked after under a Private Fostering arrangement. On admission to College, and at other times, the College will be vigilant in identifying any private fostering arrangement.
- acknowledging that a child that is looked after or has been previously looked after by the Local Authority potentially remains vulnerable and all staff have the skills, knowledge and understanding to support these children.

## 5. DEALING WITH A DISCLOSURE AND RECORD KEEPING

- 5.1. If a member of staff has a concern about a student or if a student makes a disclosure, staff will appropriately respond by listening and offering reassurance. Staff should:

**A. Make an accurate factual record as soon as possible including details of:**

- Dates and times of their observations
- Dates and times of any discussions in which they were involved
- Any injuries
- Explanations given by the student
- What action was taken
- Any actual words or phrases used by the student
- Any questions the staff member asked (remembering not to ask any leading questions)

The records must be sent electronically to [wecare@henleycol.ac.uk](mailto:wecare@henleycol.ac.uk)

The records of such concerns will then be stored securely on the College's CPOMS system by the Safeguarding and Welfare Team.

**B. Listen to wishes and feelings of the student, but not to promise any confidentiality**

**C. Report it to the DSL/DDSL in person, by telephone (4444) or by email to [wecare@henleycol.ac.uk](mailto:wecare@henleycol.ac.uk)**

**D. The DSL or DDSL will consider if there is a requirement for immediate medical intervention, however urgent medical attention should not be delayed if the DSL is not immediately available.**

**E. In the absence of the DSL or DDSL or outside of College hours, staff will refer directly to MASH (0345 050 7666) or the police (999), if the child is in imminent danger, for advice and guidance.**

- 5.2. The DSL will ensure any decisions and justifications for those decisions will be recorded in writing with clear outcomes documented following on any actions taken.
- 5.3. The College will discuss any concerns it has with a child's parents or guardians. There may be occasions when this is not appropriate and College staff would consult with other agencies prior to involving parents. The College will record any decision not to discuss with parents or guardians and why.
- 5.4. Safeguarding records are kept for individual students and are maintained separately from all other records relating to the child in the College. Safeguarding records are kept in accordance with General Data Protection Regulations (GDPR) and our own College GDPR policy.
- 5.5. All safeguarding records will be transferred in accordance with GDPR to the child's receiving setting and a receipt of delivery will be obtained. The College will ensure that when a student who is the

subject of a Child Protection (CP) Plan leaves, their information is transferred to the new setting within 5 working days and that the child's Social Worker is informed that the child has moved.

- 5.6 The Principal will be kept informed of any significant concerns by the DSL and all other staff are informed on a need-to-know basis.

## **6. THE ROLE OF AN APPROPRIATE ADULT IN SAFEGUARDING**

- 6.1. The College will provide students with an appropriate adult in the event of any police interview onsite. The Police and Criminal Evidence (PACE) act advises that "The role of the appropriate adult (AA) is to safeguard the rights, entitlements and welfare of juveniles and vulnerable persons", with there being further elaboration that the AA is expected to observe that the police are acting properly and fairly in relation to a vulnerable detained persons rights and entitlements, as well as helping the detained person understand their rights.

## **7. INFORMATION SHARING**

- 7.1. The College recognises that all matters relating to Safeguarding are confidential.
- 7.2. All staff members have a professional responsibility to share information with other agencies to safeguard children.
- 7.3. All staff members who come into contact with students will be given appropriate training to understand the purpose of information sharing to safeguard and promote student welfare.
- 7.4. The College will ensure that staff members are confident about what they can and should do under the law, including how to obtain consent to share information and when information can be shared without consent.
- 7.5. Staff should not assume a colleague or another professional will take action and share information that might be critical in keeping students safe.

## **8. MULTI AGENCY WORKING**

- 8.1. The College will develop and promote effective working relationships with other agencies, including agencies providing early help services to children, the police, and Children's Social Care.
- 8.2. The College will ensure that relevant staff members participate in multi-agency meetings and forums, including child protection conferences and core groups, to consider individual children
- 8.3. The College will participate in Child Safeguarding Practice Reviews (CSPR's), other reviews and file audits as and when required to do so by the Oxfordshire Children's Safeguarding Board. The College will ensure that it has a clear process for gathering the evidence required for reviews and audits and embed recommendations into practice and compile required actions within agreed timescales.

## **9. SAFER RECRUITMENT**

- 9.1. The Henley College is committed to ensuring the development of a safe culture and that all steps are taken to recruit staff and volunteers who are safe to work with our students and staff.
- 9.2. The Governing Body and Leadership Team are responsible for ensuring that the College follows safe recruitment processes outlined within guidance.
- 9.3. The Henley College is responsible for ensuring that the College maintains an accurate Single Central Record (SCR) in line with statutory guidance.
- 9.4. The Governing Body will ensure that at least one of the people who conducts a recruitment interview has completed safer recruitment training.

- 9.5. The College is also committed to supporting the statutory guidance from the Department for Education on the application of the Childcare (Disqualification) Regulations 2009 and related obligations under the Childcare Act 2006 in Colleges.
- 9.6. The College will ensure that contractors and providers are aware of our College's safeguarding policy and procedures. The College will require that employees and volunteers provided by these organisations use our procedure to report concerns. The College will seek assurance that employees and volunteers provided by these organisations and working with our children have been subjected to the appropriate level of safeguarding checks in line with *Keeping Children Safe in Education: Statutory Guidance for Schools and Colleges, 2022*. If assurance is not obtained, permission to work with our students or use of our College premises may be refused.
- 9.7. When the College commissions services from other organisations, the College will ensure that compliance with our policy and procedures is a contractual requirement.
- 9.8. The College advise all staff to disclose any reason that may affect their suitability to work with students that could be a transferable risk to their role.

## **10. TRAINING**

- 10.1. All staff in our College are expected to be aware of the signs and symptoms of abuse and must be able to respond appropriately.
- 10.2. Our DSL undergoes training to provide them with the knowledge and skills required to carry out their role. Our DSL and any members of our DSL team undergo their DSL training every 2 years through the OSCB to enable them to fulfil their role.
- 10.3. Training is provided for all staff to a generalist level every 3 years and updates around safeguarding are shared with staff regularly.
- 10.4. Separate training is provided to all new staff on appointment as part of their induction process which would also includes Online Safety.
- 10.5. The College will ensure that staff members provided by other agencies and third parties, e.g. supply teachers and contractors, have received appropriate safeguarding training commensurate with their roles before starting work. They will be given the opportunity to take part in whole-College training if it takes place during their period of work for the College.
- 10.6. The Designated Safeguarding Lead will provide briefings to the College on any changes to safeguarding legislation and procedures and relevant learning from Safeguarding Practice Reviews (CSPR's) in line with Working Together 2018. These will occur annually or more frequently when necessary.
- 10.7. The College will maintain accurate and up to date records of staff induction and training.

## **11. WHISTLEBLOWING IN A SAFEGUARDING CONTEXT**

- 11.1. While the College has a separate whistleblowing policy, this is a summary that outlines the process when there is a concern that safeguarding issues have not been reported or followed correctly. This does not replace the whistleblowing policy and should be read in conjunction with the College policy.
- 11.2. Whistleblowing is a term that is used when staff want to report a concern within their organisation that involves their manager or a person senior to them in the organisation which may prevent them from following the normal reporting systems. There are a limited number of areas that can be called Whistleblowing, and the policy protects staff from being punished for raising concerns.

- 11.3 Within The Henley College, the Principal, Satwant Deol, is the senior manager and responsible for all staff. If you are concerned that any member of staff within the College is not following safeguarding processes or behaving in a way that is placing children at risk, you should, in the first place, make the Principal aware.
- 11.4 If your concern is about the Principal, you should raise this with Mike Ashton, our Chair of Governors.
- 11.5 If you would prefer to raise your concerns outside of the College, then you are able to contact the NSPCC whistleblowing line on 0800 028 0285 or by email at [help@nspcc.org.uk](mailto:help@nspcc.org.uk) or make contact directly with Oxfordshire County Council.
- 11.6 If you believe that a member of the College staff is harming a child (an allegation) and this has been reported to the Principal and no or insufficient action has been taken, or the member of staff you have concerns about is the Principal, then you are able to contact the Designated Officers team (LADO) on 01865 810603 or email [lado.safeguardingchildren@oxfordshire.gov.uk](mailto:lado.safeguardingchildren@oxfordshire.gov.uk)
- 11.7 If you believe that a child is being abused by individuals outside the College, you can make a referral to Children's Social Care by calling the MASH on **0345 050 7666** (office hours) or **0800 833 408** (outside of office hours). Further guidance for staff can be accessed through the below links:

<https://www.gov.uk/government/publications/what-to-do-if-youre-worried-a-child-is-being-abused--2>  
<https://www.nspcc.org.uk/what-is-child-abuse/types-of-abuse/>

## **12. SITE SECURITY**

- 12.1. All staff members have a responsibility to ensure our buildings and grounds are safe, this includes ensuring the safety of any visitors into College. Our visitor policy is held on our website at the below link:
- [Policies \(henleycol.ac.uk\)](https://www.henleycol.ac.uk/Policies)
- 12.3. The College will not accept the behaviour of any individual, parent or anyone else, that threatens College security or leads others, child, or adult, to feel unsafe. Such behaviour will be treated as a serious concern and may result in a decision to refuse the person access to the College site.

## **13. QUALITY ASSURANCE**

- 13.1. The College will ensure that systems are in place to monitor the implementation of and compliance with this policy and accompanying procedures.
- 13.2. The College's senior management and the governing body will ensure that action is taken to remedy any deficiencies and weaknesses identified in child protection arrangements without delay.

## **14. POLICY REVIEW**

- 14.1. This policy and the procedures will be reviewed every academic year. All other linked policies will be reviewed in line with the policy review cycle
- 14.2. The Designated Safeguarding Lead will ensure that staff members, including volunteers and sessional workers are made aware of any amendments to policies and procedures
- 14.3. Additional updates to the safeguarding policy and appendix will take place when needed.

**Date approved by governing body: 5 December 2022**

**Date to be reviewed by governing body: 30 November 2022**

## Appendix A

### Roles and Responsibilities within The Henley College

#### Staff responsibilities

***All staff have a key role to play in identifying concerns early and in providing help for students. To achieve this, you will:***

- Establish and maintain an environment where students feel secure, are encouraged to talk and are listened to.
- Ensure students know that there are adults in the College who they can approach if they are worried or have concerns.
- Plan opportunities within the curriculum for students to develop the skills they need to recognise, assess and manage risk appropriately and keep themselves safe.
- Attend training in order to be aware of and alert to the signs of abuse.
- Maintain an attitude of “it could happen here” with regards to safeguarding.
- Record their concerns if they are worried that a student is being abused and report these to the DSL or DDSL as soon as practical that day.
- Be prepared to refer directly to MASH, and the police if appropriate, if there is a risk of significant harm and the DSL or DDSL is not available.
- Follow the allegations procedures, as set out in this policy and KCSIE 2022, if the disclosure is an allegation against a member of staff.
- Follow the procedures set out by the Oxfordshire Safeguarding Children Board (OSCB) and take account of guidance issued by the DfE.
- Treat information with confidentiality but never promising to ‘keep a secret’.
- Have an understanding of Early Help and be prepared to identify and support students who may benefit from early help.
- Liaise with other agencies that support students and provide early help.
- Ensure they know who the DSL and DDSL’s are and know how to contact them.
- Have an awareness of the procedures relating to the safeguarding response for students who go missing from education and the role of the DSL
- Have an awareness of mental health problems and how in some cases an indicator of the student being at risk of harm.

#### Senior Leadership responsibilities:

***The Principal has overall responsibility for safeguarding in the college and, in particular, for:***

- appointing a Designated Safeguarding Lead
- meeting weekly with the DSL to review areas of risk and items of concern
- contacting the LADO in the event of allegations of harm against staff and appointing an investigating officer.

***The Senior Leadership Team as a whole have a collective safeguarding responsibility. This is defined by the OSCB as below:***

- Contribute to inter-agency working in line with Working Together to Safeguard Children 2019 guidance.
- Provide a co-ordinated offer of early help when additional needs of students are identified.
- Ensure staff are alert to the various factors that can increase the need for early help as written in KCSIE 2022.

- Working with Children's Social Care, supporting their assessment and planning processes including the College's attendance at conference and core group meetings and the contribution of written reports for these meetings.
- Carry out tasks delegated by the governing body such as training of staff, safer recruitment and maintaining a single central register.
- Provide support and advice on all matters pertaining to safeguarding and student protection to all staff, regardless of their position within the College.
- Treat any information shared by staff or students with respect and follow agreed policies and procedures.
- Ensure that allegations or concerns against staff are dealt with in accordance with guidance from Department for Education (DfE) and the OSCB procedures.

### **Governing body responsibilities**

***The Governing body as a whole have a collective safeguarding responsibility. This is defined by the OSCB as below:***

- Ensure the College has effective safeguarding policies through the Nominated Safeguarding Governor's reports.
- Ensure OSCB is informed in line with local requirements about the discharge of duties via the annual safeguarding report that is returned to the Education Safeguarding Advisory Team.
- Ensure recruitment, selection and induction follows safer recruitment practice including all appropriate checks.
- Ensure allegations against staff are dealt with by the Principal and that allegations against the Principal are dealt with by the Chair of Governors.
- Ensure a member of the Senior Leadership Team is appointed as Designated Safeguarding Lead and has this recorded in their job description.
- Ensure staff have been trained appropriately and this is updated in line with guidance.
- Ensure any safeguarding deficiencies or weaknesses are remedied without delay.
- Ensure a nominated governor for safeguarding is identified.

***The nominated safeguarding governor will have oversight of the college's safeguarding policies and procedures to ensure their effectiveness and keep the board up to date with statutory safeguarding and child protection guidance.***

### **The role of the Designated Safeguarding Lead**

#### **Managing referrals:**

- Refer cases to MASH, and the police where appropriate, in a timely manner avoiding any delay that could place the child at more risk
  - Identify any safeguarding issues relating to individual children, especially ongoing enquiries under section 47 of the Children Act 1989.
  - Act as a source of support, advice, and expertise to staff members on matters of child protection and safeguarding, including Contextual Safeguarding.
  - Have responsibility to ensure there is at least one key adult for 'Operation Encompass'\* and a point of contact for Child Exploitation.
- \*Guiding principles of the scheme are here <https://www.operationencompass.org/College-participation>.  
An annual information letter must be sent to parents. All downloadable documents are here: <https://www.operationencompass.org/College-participation/College-downloads>.
- To ensure that the Local Authority are notified if children are persistently absent or [missing from education](#)

### Record keeping:

- Keep written (or online) records of safeguarding and welfare concerns and ensure a stand-alone file is created as necessary for children with safeguarding concerns
- The College should have an emergency contacts for every child in the College in case of emergencies, and in case there are welfare concerns at the home.
- Maintain a chronology of significant incidents for each child with safeguarding concerns, including a record of decisions made and the reasons for those decisions.
- Ensure such records are kept confidentially and securely and separate from the child's educational record.
- When a child leaves our College, the Designated Safeguarding Lead will contact the Designated Safeguarding Lead at the new College and will ensure that the safeguarding file is forwarded to the receiving College within 5 College days. The College will retain evidence to demonstrate how the file has been transferred; this may be in the form of a written confirmation of receipt from the receiving College and/or evidence of recorded delivery.
- Where a parent elects to remove their child from the College roll to home educate, the College will make arrangements to pass any safeguarding records to the Education Social Welfare Service.

### Multi-agency working and information sharing:

- The DSL recognises and is committed to its responsibility to work with other professionals and agencies in line with statutory guidance.
- Our College is not the investigating agency when there are child protection concerns. The College will, however, contribute to the investigation and assessment processes as required. The College recognise the importance of multi-agency working and will support attendance at relevant safeguarding meetings, including Child Protection Conferences, Core Groups, Strategy Meetings, Child in Need meetings or other early help multi-agency meetings.

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/721581/Information\\_sharing\\_advice\\_practitioners\\_safeguarding\\_services.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/721581/Information_sharing_advice_practitioners_safeguarding_services.pdf)

### Training:

The DSL will ensure all staff undertake appropriate annual updates in order to:

- be able to recognise signs of abuse and how to respond to them, including special circumstances such as child sexual exploitation, female genital mutilation, fabricated or induced illness
- understand the assessment process for providing early help and intervention, e.g., OSCB thresholds of need, preventative education, and the local offer
- have a working knowledge of how the local authority conducts initial and review child protection (CP) case conferences and contribute effectively to these; and
- be alert to the specific needs of children in need (as specified in section 17 of the Children Act 1989), those with special educational needs, pregnant teenagers, young carers, those who are privately fostered, vulnerable to exploitation, racialisation and subject to listening or hearing to domestic abuse.
- Ensure each member of staff has read and understands the College's safeguarding policy and procedures, including providing induction on these matters to new staff members. Induction and training must include the College's behaviour policy and the College's procedures for managing children who are missing education, as well as the staff code of conduct, and the child protection policy, dealing with disclosures and managing allegations processes.
- Organise face-to-face whole-College Safeguarding training for all staff members at least **every three years**.
- The DSL will ensure their training remains in date (every 2 years)
- All staff should be aware of key policies systems within their College which support safeguarding, and these should be explained to them as part of staff induction.
- Ensure the College allocates time and resources every year for relevant staff members to attend training and receive continuous professional development opportunities.
- Encourage a culture of listening to children and taking account of their wishes and feelings in any action the College takes to protect them.
- Maintain accurate records of induction, ongoing training, and continual professional development (CPD) relating to safeguarding.

**Awareness raising:**

- Ensure our College's child protection policies are known, understood, and used appropriately.
- Ensure our College's safeguarding policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with governing bodies regarding this.
- Ensure our safeguarding policy is available publicly and parents know referrals about suspected abuse or neglect may be made and the role of the College or college in this.

**Quality assurance:**

- Monitor the implementation of and compliance with policy and procedures, including periodic audits of Safeguarding and welfare concerns files (at a minimum once a year).
- Complete the 157/175 annual safeguarding report and submit to the Local Authority
- Provide regular reports, to the governing body detailing changes and reviews to policy, training undertaken by staff members and the number of children with child protection plans and other relevant data.
- Take lead responsibility for remedying any deficiencies and weaknesses identified in Safeguarding arrangements.

**Support for staff:**

- The College will have a framework for providing an opportunity to staff who are working directly with vulnerable young people to have regular access to an appropriate manager to talk through and reflect on their involvement with the student's case.



## Appendix B

### Definitions and Categories of Harm and Abuse

#### Definitions:

**Abuse** is any form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others (e.g., via the internet). They may be abused by an adult or adults or another child or children.

**Children** are any people who have not yet reached their 18<sup>th</sup> birthday; a 16-year-old, whether living independently, in further education, in the armed forces or in hospital, is a child and is entitled to the same protection and services as anyone younger. KCSIE now applies to providers of post 16 education as set out Education and Training (Welfare of Children) Act 2021.

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

**Early help** means providing support as soon as a problem emerges, at any point in a child's life, from the foundation years to teenage years.

**Harm** is ill treatment or impairment of health and development, including impairment suffered from seeing or hearing the ill treatment of another.

**Safeguarding children** is the action we take to promote the welfare of children and protect them from harm.

**Safeguarding and promoting the welfare of children** is defined as:

- protecting children from maltreatment
- preventing the impairment of children's mental health, physical health, or development
- ensuring the 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

**Significant harm** is the threshold that justifies compulsory intervention in the family in the best interests of the child. Section 47 of the Children Act 1989 states 'where the question of whether harm suffered by a child is significant turns on the child's health or development, his health or development shall be compared with that which could reasonably be expected of a similar child.'

**Vulnerable children** are any children who may benefit from [early help](#), but all College staff should be particularly alert to the potential need for early help for a child who:

- is disabled and has specific additional needs.
- has special educational needs (whether they have a statutory Education, Health and Care Plan).
- is a young carer.
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups.
- is frequently missing/goes missing from care or from home.
- is at risk of modern slavery, trafficking, or exploitation.
- is at risk of being radicalised or exploited.
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse; <https://www.gov.uk/government/collections/domestic-abuse-bill>
- is misusing drugs or alcohol themselves.
- has returned home to their family from care; and

- is a privately fostered child.

### **CATEGORIES OF ABUSE:**

**Emotional abuse** is the persistent emotional maltreatment of a child such that it causes severe and persistent adverse effects on the child's emotional development and conveying 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
- interactions that are beyond a child's developmental capability
- overprotection and limitation of exploration and learning,
- preventing the child from participating in normal social interaction.
- seeing or hearing the ill-treatment of another
- serious bullying (including cyberbullying)
- causing children frequently to feel frightened or in danger, or the exploitation or corruption of children

Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

**Neglect** is the persistent failure to meet a child's basic physical or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance misuse. Once a child is born, it may involve a parent failing to:

- provide adequate food, clothing, and shelter, including exclusion from home or abandonment
- protect a child from physical and emotional harm or danger
- ensure adequate supervision, including the use of inadequate care givers
- ensure access to appropriate medical care or treatment

It may also include neglect of, or unresponsiveness to, a child's basic emotional needs. Educational neglect is also considered: <https://www.nspcc.org.uk/what-is-child-abuse/types-of-abuse/neglect/>

**Physical abuse** may involve hitting, shaking, throwing, poisoning, burning, 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.

**Sexual abuse:** involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or 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 (KCSIE 2022).

### **MENTAL HEALTH:**

All staff should also 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.

Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff, however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one

Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children's experiences, can impact on their mental health, behaviour, and education

If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following their child protection policy, and speaking to the designated safeguarding lead or a deputy.

For further advice and guidance see below:

<https://www.gov.uk/government/publications/promoting-children-and-young-peoples-emotional-health-and-wellbeing>

The Department for Education has published advice and guidance on [Preventing and Tackling Bullying](#), and [Mental Health and Behaviour in Schools](#) (which is also be useful for colleges). In addition, Public Health England has produced a range of resources to support teachers in promoting positive health, wellbeing and resilience among young people:

[Promoting children and young people's emotional health and wellbeing](#).

There are three thresholds for and types of referral that need to be considered:

- is this a child with additional needs; where their health, development or achievement may be adversely affected?
- where age-appropriate progress is not being made and the causes are unclear
- where the support of more than one agency is needed to meet the child or young person's needs

If this is a child with additional needs, then staff should discuss the issues with the Head of Additional Learning Support, Amanda Rowe, the child, and their parents or guardians. You will need to obtain parental consent for an EHAT to be completed.

#### **Is this a child in need matter?**

Section 17 of the Children Act 1989 says:

- they are unlikely to achieve or maintain, or to have opportunity to achieve or maintain, a reasonable standard of health or development, without the provision of services by a local authority
- their health or development is likely to be impaired, or further impaired, without the provision of such services
- they are SEND (and as such can face additional safeguarding challenges)

If this is a child in need, discuss the issues with the Designated Safeguarding Lead and parents or guardians. Obtain their consent for referral.

#### **Is this a child protection matter?**

Section 47 of the Children Act 1989 says:

- children at risk or who are suffering significant harm
- children suffering the effects of significant harm
- serious health problems

More information on the thresholds can be found here:

[Oxfordshire-Threshold-of-Needs-2021.pdf \(oscb.org.uk\)](#)

If this is a child protection matter, this should be discussed with the Designated Safeguarding Lead and will need to be referred to the MASH by the College as soon as possible.

[Multi-Agency Safeguarding Hub \(MASH\) | Oxfordshire County Council](#)

## Appendix C

### Allegations against Staff or Volunteers

This procedure should be used in all cases in which it is alleged a member of staff or volunteer in the college, or another adult who works with children has:

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

#### **In dealing with allegations or concerns against an adult, staff must:**

Report any concerns about the conduct of any member of staff or volunteer to the Principal as soon as possible.

If an allegation is made against the Principal, the concerns need to be raised with the Chair of Governors as soon as possible. If the Chair of Governors is not available, then the Designated Officer for Oxfordshire should be contacted directly.

While colleges are not the employer of supply teachers, they should ensure allegations are dealt with properly. In no circumstances should the 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.

There may be situations when the Principal or Chair of Governors 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.

Once an allegation has been received by the Principal, or Chair of Governors in the case of an allegation against the Principal, they will contact the LADO on 01865 810603 or [lado.safeguardingstudentren@oxfordshire.gov.uk](mailto:lado.safeguardingstudentren@oxfordshire.gov.uk) as soon as possible and before carrying out any investigation into the allegation other than preliminary enquiries. In the event of an allegation of harm by a member of staff, the College will always refer to the Local Designated Officer even if the young person is over the age of 18 (but joined the College when younger). Where a student was already aged 18 when joining, the College will seek advice from the local adult safeguarding board instead.

In liaison with the LADO, the Principle or Chair of Governors will determine how to proceed and if necessary, a referral will be made to the MASH and/or the police.

#### **The named Designated Officer (LADO) for Oxfordshire County Council is Jo Lloyd.**

The Designated Officer or a member of the team, will assess the information provided and advise on next steps, in line with KCSIE 2022 part 4, and Oxfordshire County Council's Designated Officers' local procedures.

Following on from liaison with the LADO, the Principal or Chair of Governors will:

- Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the designated officer (and the police or children's social care services, where necessary). Where the police and/or children's social care services are involved, the College will only share such information with the individual **that** has been agreed with those agencies. Where appropriate (in the circumstances described above), the College must carefully consider whether suspension of the individual from contact with children at the College is justified or whether alternative arrangements can be put in place. Advice will be sought from the designated officer, police and/or children's social care services, as appropriate.

- If immediate suspension is considered necessary, agree and record the rationale for this with the designated officer. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at the College and their contact details. Suspension is not a disciplinary sanction in itself and is only used as necessary to facilitate an effective investigation or to prevent future harm or misconduct occurring.
- If it is decided that no further action is to be taken in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the designated officer what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation.
- If it is decided that further action is needed, take steps as agreed with the designated officer to initiate the appropriate action in the College and/or liaise with the police and/or children's social care services as appropriate.

The College will seek to provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and considering what other support is appropriate. Support for staff can be found through their union representative or, for emotional/mental health support, through the employee assistance programme.

The College will inform the parents or carers of the child/children involved about the allegation as soon as possible if they do not already know (following agreement with children's social care services and/or the police, if applicable). The College will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against teachers (where this applies) while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice.

The College will keep the parents or carers of the child/children informed of the progress of the case.

The College will make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a student, or if the individual otherwise poses a risk of harm to students.

#### **Investigation:**

Where a formal investigation is required, this will be carried out by a suitably trained and senior manager or external adviser who is not directly involved in the incident. This investigating officer will be appointed by the Principal, or the Chair of Governors in the event of an allegation against the Principal, would determine whether disciplinary proceedings are appropriate. Until the investigation has been completed and a decision made, any actions are not considered as disciplinary, even where it may be necessary to suspend an employee while the investigation is being carried out.

#### **Suspension:**

Suspension will not be the default position, and will only be considered in cases where there is reason to suspect that a child or other children is/are at risk of harm, or the case is so serious that there might be grounds for dismissal, or an investigation could be significantly impeded should the member of staff stay in post. In such cases, the College will only suspend an individual if it has considered all other options available and there is no reasonable alternative. Based on an assessment of risk, the College will consider alternatives such as:

- Redeployment within the College so that the individual does not have direct contact with the student or students concerned.

- Providing an assistant to be present when the individual has contact with students.
- Redeploying the individual to alternative work in the College so that they do not have unsupervised access to students.
- Moving the student or students to classes where they will not come into contact with the individual, making it clear that this is not a punishment and parents have been consulted.
- Temporarily redeploying the individual to another role in a different location.

#### **Scope and conduct of an investigation:**

Evidence will be gathered in the form of a formal investigation. This will include investigation meetings with the relevant parties as well as any witnesses and other individuals that could provide useful information; for example, the staff member's line manager and members of the Safeguarding Team. Other evidence will also be considered if applicable such as historical file notes, performance reviews and email records and relevant online materials on virtual platforms such as Teams and social media. Should testimony be disputed, corroborating evidence should be sought and if this can't be sourced the investigation officer should review and make a reasonable response based on the evidence provided.

An investigation does not form part of the disciplinary process and so there is no statutory right for an employee to be accompanied during this fact-finding stage. The scope will be confined to the allegations raised. However, where similar issues have been previously raised, these should be reviewed and where relevant, considered for context, i.e. potential patterns of behaviour/ conduct or previous warnings. The purpose is not to re-hear or re-open any historic cases for investigation.

While gathering evidence, permission may be requested by the investigating officer to use a digital recording device. Both parties would have to agree to this, the digital recording device would be provided by the College and the employee may request a copy of the audio file. The notes would still be written up for the case report.

When the investigation has been concluded, the investigating officer, in collaboration with the Head of HR and the LADO, will determine a specific allegation outcome. They will determine whether there is no case to answer or sufficient evidence and cause for concern to progress to a disciplinary hearing.

#### **Definitions for specific outcomes of allegation investigations:**

**Substantiated:** there is sufficient evidence to prove the allegation

**Malicious:** there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive

**False:** there is sufficient evidence to disprove the allegation

**Unsubstantiated:** there is insufficient evidence to either prove or disprove the allegation (this does not imply guilt or innocence)

**Unfounded:** to reflect cases where there is no evidence or proper basis which supports the allegation being made

The outcome as to whether or not the case is to be progressed should be communicated, in writing, to the employee as soon as is reasonably possible

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

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

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

If the allegation is substantiated and the individual is dismissed or the College ceases to use their services, or the individual resigns or otherwise ceases to provide their services, the investigating officer and the HR Manager will discuss with the designated officer whether to make a referral to the DBS for consideration of whether inclusion on the barred lists is required.

**Individuals returning to work after suspension:**

If it is decided on the conclusion of a case that an individual who has been suspended can return to work, the investigating officer and the line manager will consider how best to facilitate this. The investigating officer and the DSL will also consider how best to manage the individual's contact with the child or children who made the allegation, if they are still attending the College.

**Unsubstantiated or malicious allegations:**

If an allegation is shown to be deliberately invented, or malicious, the Principal, or Chair of Governors in the case of an allegation against the Principal, will consider whether any disciplinary action is appropriate against the student or member of staff who made it, or whether the police should be asked to consider whether action against those who made the allegation might be appropriate, even if they are not a student or member of staff.

**Confidentiality:**

The College will make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered. The case manager will take advice from the local authority's designated officer, police, and children's social care services, as appropriate, to agree:

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

**Record-keeping:**

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

- A clear and comprehensive summary of the allegation
- Details of how the allegation was followed up and resolved
- Notes of any action taken, and decisions reached (and justification for these, as stated above)

If an allegation or concern is not found to have been malicious, the College will retain the records of the case on the individual's confidential personnel file and provide a copy to the individual. Where records contain information about allegations of sexual abuse, the College will preserve these for the Independent Inquiry into Child Sexual Abuse (IICSA), for the term of the inquiry. The College will retain all other records at least until the individual has reached normal pension age, or for 10 years from the date of the allegation if that is longer. The records of any allegation that is found to be malicious will be deleted from the individual's personnel file.



**References:**

When providing employer references, the College will not refer to any allegation that has been proven to be false, unsubstantiated, or malicious, or any history of allegations where all such allegations have been proven to be false, unsubstantiated or malicious.

**Learning lessons:**

After the outcome of any case, the College will review the circumstances of the case with the local authority's designated officer to determine whether there are any improvements that it can make to the College's procedures or practice to help prevent similar events in the future.

## Appendix D

### Low Level Concerns with Staff

#### Definition of low level concerns:

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

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

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

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

If there is any doubt as to whether the concern constitutes a low level concern or not, advice should be sought from the LADO.

#### Sharing low level concerns:

The College recognises the importance of creating a culture of openness, trust and transparency to encourage all staff to share low-level concerns so that they can be addressed appropriately. The College will create this culture by:

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

#### Responding to low level concerns:

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

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

The DSL will use the information collected to categorise the type of behaviour and determine any further action.

#### Record keeping:

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

- Kept confidential, held securely, and comply with the DPA 2018 and UK GDPR

- Reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, we will decide on a course of action, either through our disciplinary procedures or, where a pattern of behaviour moves from a concern to meeting the harms threshold, we will refer it to the designated officer at the local authority
- Retained at least until the individual leaves employment at the College. Where a low-level concern relates to a supply teacher or contractor, we will notify the individual's employer, so any potential patterns of inappropriate behaviour can be identified.

**References:**

The College will not include low level concerns in references unless:

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

## Appendix E

### Further Information on Contextual Safeguarding Issues

#### Female Genital Mutilation

Female Genital Mutilation (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. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a girl being at risk of FGM, or already having suffered FGM.

[Harmful Practices - Oxfordshire Safeguarding Children Board \(oscb.org.uk\)](https://oscb.org.uk)

#### Indicators

There is a range of potential indicators that a girl may be at risk of FGM. Warning signs that FGM may be about to take place, or may have already taken place, can be found on pages 16-17 of the Multi-Agency Practice Guidelines, and Chapter 9 of those Guidelines (pp 42-44) focuses on the role of an educational setting. Section 5C of the Female Genital Mutilation Act 2003 (as inserted by section 75 of the Serious Crime Act 2015) gives the Government powers to issue statutory guidance on FGM to relevant persons. Once the government issues any statutory multi-agency guidance, this will also apply to the College.

#### Actions

If staff have a concern, they should activate the College's safeguarding procedure, using existing national and local protocols for multi-agency liaison with police and children's social care. Mandatory reporting commenced in October 2015. These procedures remain when dealing with concerns regarding the potential for FGM to take place. Where a teacher discovers that an act of FGM appears to have been carried out on a girl who is aged under 18, there will be a statutory duty upon that individual to report it to the police.

#### Mandatory Reporting Duty

From October 2015, Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) placed a statutory duty upon teachers, along with social workers and healthcare professionals, to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Those failing to report such cases will face disciplinary sanctions. It will be rare for teachers to see visual evidence, and they should not be examining students, but the same definition of what is meant by "to discover that an act of FGM appears to have been carried out" is used for all professionals to whom this mandatory reporting duty applies. Unless the teacher has a good reason not to, they should still consider and discuss any such case with the College's Designated Safeguarding Lead and involve MASH as appropriate.

#### Fabricated or Induced Illness / Perplexing Presentation

Staff must be aware of the risk of children being abused through fabricated or induced illness (FII). There are three main ways of the carer fabricating or inducing illness in a child.

These are not mutually exclusive and include:

- fabrication of signs and symptoms. This may include fabrication of past medical history.
- fabrication of signs and symptoms and falsification of hospital charts and records, and specimens of bodily fluids. This may also include falsification of letters and documents.
- induction of illness by a variety of means.

Where this is identified and considered a risk, a referral will be made to the MASH for support and guidance. The College may involve other agencies in making their assessments. That could include the College nurse,

community paediatrician, occupational therapists for example.

### **Gang and Youth / Serious Violence**

Children and Young People who become involved in gangs are at risk of violent crime and as a result of this involvement are deemed vulnerable. Agencies and professionals have a responsibility to safeguard these children and young people and to prevent further harm both to the young person and their potential victims. Risks associated with gang activity include access to weapons (including firearms), retaliatory violence and territorial violence with other gangs, knife crime, sexual violence, and substance .

<https://www.gov.uk/government/publications/serious-violence-strategy>

Children are also increasingly being targeted and recruited online using social media. Children can easily become trapped by this type of exploitation as county lines gangs can manufacture drug debts which need to be worked off or threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

A number of the indicators for CSE and CCE may be applicable to where children are involved in county lines. Some additional specific indicators that may be present where a child is criminally exploited through involvement in county lines are children who:

- go missing and are subsequently found in areas away from their home.
- have been the victim or perpetrator of serious violence (e.g., knife crime).

### **Faith Based Abuse**

The College recognises the 'National Action Plan to Tackle Abuse linked to faith or belief' which describes this abuse as:

*'not about challenging people's beliefs, but where beliefs lead to abuse that must not be tolerated. This includes belief in witchcraft, spirit possession, demons or the devil, the evil eye, or djinns, dakini, kindoki, ritual or muti murders and use of fear of the supernatural to make children comply with being trafficked for domestic slavery or sexual exploitation. The beliefs which are not confined to one faith, nationality or ethnic community.'*

When this type of abuse is suspected staff will make a referral to the MASH Team for support and guidance.

<https://www.gov.uk/government/publications/national-action-plan-to-tackle-child-abuse-linked-to-faith-or-belief>

### **Risk of Trafficking**

Article 3 of the Palermo Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children, Supplementing the United Nations Convention Against Transnational Organised Crime to the UN Convention (2000) (ratified by the UK on 6 February 2006) defines trafficking as:

- "Trafficking of persons" shall mean the recruitment, transportation, transfer, harbouring or receipt of persons, by means of the threat of or use of force or other forms of coercion, of abduction, of fraud, of deception, of the abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person, for the purpose of exploitation. Exploitation shall include, at a minimum, the exploitation of the prostitution of others or other forms of sexual exploitation, forced labour or services, slavery, or practices similar to slavery, servitude, or the removal of organs.
- The consent of a victim of trafficking in persons to the intended exploitation set forth in subparagraph (a) of this article shall be irrelevant where any of the means set forth in subparagraph (a) have been used.

- The recruitment, transportation, transfer, harbouring or receipt of a child for the purpose of exploitation shall be considered “trafficking in persons” even if this does not involve any of the means set forth in sub-paragraph (a) of this article
- “Child” shall mean any person under eighteen years of age.

Children trafficked into the country may be registered at an educational setting for a term or longer, before being moved to another part of the UK or abroad. This pattern of registration and de-registration may be an indicator that a child has been trafficked. It has been identified as a particular concern in educational settings which are situated near ports of entry, but practitioners should be alert to this possibility in all settings. However, practitioners should always bear in mind that not all children who go missing from education have been victims of trafficking. For example, there may be instances of children from communities that move around – Gypsy, Roma, traveller, or migrant families – who collectively go missing.

If a member of the College staff suspects that a child may have been trafficked, they should act immediately to inform the member of staff with designated responsibility for child protection, Tracy Page, and ensure that police or local authority children’s social care are contacted immediately.

### **Risks Associated with Parent/Carer Mental Health**

The majority of Parents who suffer mental ill-health can care for and safeguard their children and/or unborn child. Some parents, however, will be unable to meet the needs and ensure the safety of their children. The College will follow the guidance outlined in ‘working with parents with mental health problems and their children (Think child, think parent, think family: a guide to parental mental health and child welfare).

Our approach is to recognise; seek support; instil preventive factors and monitor. Designated Safeguarding Lead should seek support through the Early Help team but escalate to the MASH Team if they are concerned that the child involved is being placed at immediate risk of harm. The link below details the Early Help services available to children, young people, and their families.

[Early Help and the Locality Community Support Service \(LCSS\) - Oxfordshire Safeguarding Children Board \(oscb.org.uk\)](https://oscb.org.uk)

### **Drugs and Alcohol**

Children can be at risk of drugs and alcohol directly and indirectly. They may be at direct risk of having access to these substances (see guidance on gangs) or indirectly because they affect family life at home through use by parents/carers, siblings, child-minders etc.

More details can be found at:

[Substance Misuse - Oxfordshire Safeguarding Children Board \(oscb.org.uk\)](https://oscb.org.uk)

### **Honour Based Violence and Forced Marriages**

Honour Based Violence and Forced Marriage refers to a collection of practices used to control behaviour within families to protect perceived cultural or religious beliefs and honour. Violence can occur when offenders perceive that a relative has shamed the family or community by breaking their ‘code of honour’. Honour Based Violence cuts across all cultures and communities: Turkish, Kurdish, Afghani, South Asian, African, Middle Eastern, South, and Eastern European for example. This is not an exhaustive list. Where a culture is heavily male dominated, HBV may exist.

‘A forced marriage is a marriage in which one or both spouses do not (or, in the case of some vulnerable adults, cannot) consent to the marriage and duress is involved. Duress can include physical, psychological, financial, sexual and emotional pressure.’ For more information see:

<http://www.fco.gov.uk/en/travel-and-living-abroad/when-things-go-wrong/forced-marriage/>

<http://www.fco.gov.uk/en/travel-and-living-abroad/when-things-go-wrong/forced-marriage/case-studies/safer-Colleges-partnership>

<http://www.karmanirvana.org.uk/>

### **Child Sexual Exploitation & Child Criminal Exploitation**

Both CSE and CCE are forms of abuse and both occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal activity. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources. In some cases, the abuse will be in exchange for something the victim needs or wants and/or will be to the financial benefit or other advantage (such as increased status) of the perpetrator or facilitator. The abuse can be perpetrated by individuals or groups, males or females and children or adults.

The abuse can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence. Victims can be exploited even when activity appears consensual, and it should be noted exploitation. As well as being physical can be facilitated and/or take place online.

### **Child Sexual Exploitation (CSE)**

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

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

The Department for Education provide the below guide:

[Child sexual exploitation: guide for practitioners](#)

A full list of indicators can be found here:

[Child Sexual Exploitation - Oxfordshire Safeguarding Children Board \(oscb.org.uk\)](http://oscb.org.uk)

### **Child Criminal Exploitation (CCE)**

While there is still no legal definition of 'Child Criminal Exploitation' or CCE, it is increasingly being recognised as a major factor behind crime in communities across Merseyside and the UK, while also simultaneously victimising vulnerable young people and leaving them at risk of harm. A simple definition of CCE is: CCE often occurs without the victim being aware that they are being exploited and involves young people being encouraged, cajoled, or threatened to carry out crime for the benefit of others. In return they are offered friendship or peer acceptance, but also cigarettes, drugs (especially cannabis), alcohol or even food and accommodation.

**County Lines** is a term used to describe gangs, groups or drug networks that supply drugs from urban to suburban areas across the country, including market and coastal towns, using dedicated mobile phone lines or

'deal lines. They exploit children and vulnerable adults to move the drugs and money to and from the urban area, and to store the drugs in local markets. They will often use intimidation, violence, and weapons, including knives, corrosives, and firearms. County lines is a major, cross-cutting issue involving drugs, violence, gangs, safeguarding, criminal and sexual exploitation, modern slavery, and missing persons; and the response to tackle it involves the police, the National Crime Agency, a wide range of Government departments, local government agencies and voluntary and community sector organisations. County lines activity and the associated violence, drug dealing, and exploitation has a devastating impact on young people, vulnerable adults, and local communities. Further information can be found here:

[Child Criminal Exploitation - Oxfordshire Safeguarding Children Board \(oscb.org.uk\)](https://oscb.org.uk)



## Appendix F

### Preventing Radicalisation

Protecting students from the risk of radicalisation is part of College's wider safeguarding duties and is similar in nature to protecting students from other forms of harm and abuse. During the process of radicalisation, it is possible to intervene to prevent vulnerable people being radicalised.

Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism. There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. Specific background factors may contribute to vulnerability which are often combined with specific influences such as family, friends or online, and with specific needs for which an extremist or terrorist group may appear to provide an answer. The internet and the use of social media has become a major factor in the radicalisation of young people. As with managing other safeguarding risks, staff should be alert to changes in children's behaviour which could indicate that they may need help or protection. College staff should use their professional judgement in identifying children who might be at risk of radicalisation and act proportionately which may include making a referral to the Channel programme

The College is subject to a duty under section 26 of the Counterterrorism and Security Act 2015 (CTSA 2015). The College recognises its duties under the statutory Prevent Guidance (issued under section 29 of CTSA 2015). Paragraphs 57-76 of the Prevent Guidance are concerned specifically with the College's responsibility to prevent people from being drawn into terrorism; this duty is known as the Prevent duty.

[Prevent duty guidance: for England and Wales.](#)

The statutory Prevent Guidance summarises the requirements on Colleges in terms of four general themes:

- risk assessment
- working in partnership
- staff training
- IT policies

Colleges are expected to assess the risk of students being drawn into terrorism, including support for extremist ideas that are part of terrorist ideology. This means being able to demonstrate both a general understanding of the risks affecting children and young people in the area and a specific understanding of how to identify individual children who may be at risk of radicalisation and what to do to support them. It is not necessary for colleges to have distinct policies on implementing the Prevent duty but the college has clear procedures in place for protecting children at risk of radicalisation and follows the policies and guidance of the Oxfordshire Safeguarding Children Board.

[Radicalisation - Oxfordshire Safeguarding Children Board \(oscb.org.uk\)](#)

The **Prevent** guidance refers to the importance of Prevent awareness training to equip staff to identify children at risk of being drawn into terrorism and to challenge extremist ideas. All college staff undergo Prevent training every three years and the designated safeguarding leads are able to provide advice and support to other members of staff on protecting children from the risk of radicalisation.

The college ensures that children are safe from terrorist and extremist material when accessing the internet in College and suitable filtering systems are in place. The College teaches students about Prevent and online safety more generally through its Personal and Professional Development Programme.

The Department for Education has also published advice for Colleges on the Prevent duty and is intended to complement the Prevent guidance and signposts other sources of advice and support.

<https://www.gov.uk/government/publications/protecting-children-from-radicalisation-the-prevent-duty>

## Channel

College staff should understand when it is appropriate to make a referral to the Channel team. Channel is a programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. It provides a mechanism for colleges to make referrals if they are concerned that an individual might be vulnerable to radicalisation. An individual's engagement with the programme is entirely voluntary at all stages.

Section 36 of the CTSA 2015 places a duty on local authorities to ensure Channel panels are in place. The panel must be chaired by the local authority and include the police for the relevant local authority area. Following a referral, the panel will assess the extent to which identified individuals are vulnerable to being drawn into terrorism, and, where considered appropriate and necessary consent is obtained, arrange for support to be provided to those individuals. Section 38 of the CTSA 2015 requires partners of Channel panels to co-operate with the panel in the carrying out of its functions and with the police in providing information about a referred individual. Colleges are required to have regard to Keeping Children Safe in Education and, as partners, are required to cooperate with local Channel panels. Channel guidance can be found here:

<https://www.gov.uk/government/publications/channel-and-prevent-multi-agency-panel-pmap-guidance>

## Appendix G

### Children Missing From Education

All children, regardless of their circumstances, are entitled to a full-time education which is suitable to their age, ability, aptitude, and any special educational needs they may have. Local authorities have a duty to establish, as far as it is possible to do so, the identity of children of compulsory education age who are missing education in their area.

A child going missing from education is a potential indicator of abuse or neglect. College staff should follow the college's procedures for dealing with children that go missing from education, particularly on repeat occasions, to help identify the risk of abuse and neglect, including sexual exploitation, and to help prevent the risks of their going missing in future.

It is essential that all staff are alert to signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns such as travelling to conflict zones, FGM and forced marriage.

The College must inform their local authority of any student under 18 who is going to be removed from the college roll where they:

- have been taken out of College by their parents or guardians and are being educated outside the College system (e.g. home education) or have ceased to attend College
- have been certified by an appropriate medical practitioner as unlikely to be in a fit state of health to attend College before ceasing to be of compulsory education age, and neither he/she nor his/her parent or guardians has indicated the intention to continue to attend the College after ceasing to be of compulsory education age.
- are in custody for a period of more than four months due to a final court order and the College does not reasonably believe they will be returning at the end of the period
- have been permanently excluded

## Appendix H

### **Sexual harassment, violence, harmful sexual behaviours (inc. child on child abuse and 'upskirting')**

Sexual violence and sexual harassment can occur between children of any age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Sexual violence refers to sexual offences under the Sexual Offences Act 2003, including rape, assault by penetration and sexual assault.

It is important that College staff are aware of sexual violence and the fact students can, and sometimes do, abuse their peers in this way. When referring to sexual harassment, the college means 'unwanted conduct of a sexual nature' that can occur online and offline and both inside and outside of 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.

Staff must challenge any form of derogatory and sexualised language or behaviour. Staff should be vigilant to sexualised/aggressive touching/grabbing. DfE guidance situates sexual violence, sexual harassment, and harmful sexual behaviour in the context of developing a whole College safeguarding culture, where sexual misconduct is seen as unacceptable, and not 'banter' or an inevitable part of growing up. Further advice about tackling and reporting sexual harassment is found below:

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/999239/SVSH\\_2021.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/999239/SVSH_2021.pdf)

The college recognises that such events are likely to occur, and has procedures in place to deal with them. Groups at particular risk include girls, students who identify as Lesbian, Gay, Bisexual, Transgender+ (LGBT+), or are perceived by peers to be LGBT+, and students with SEND.

Students can be targeted by other students and it is vital the College provides a safe space for these students to speak out and share their concerns with members of staff. Students must be protected from 'upskirting', bullying, homophobic, biphobic and transphobic behaviour, racism, sexism, and other forms of discrimination. Further guidance from the UK Council for Internet Safety (UKCIS) for educational settings on the sharing nudes and semi-nudes is found below:

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

Staff must also have familiarity with the [Equality Act 2010 and the Public Sector Equality Duty](#) (PSED), the Human Rights Act 1998 as well as recent reforms to the Act and how they apply to safeguarding:

<https://www.gov.uk/government/consultations/human-rights-act-reform-a-modern-bill-of-rights/outcome/human-rights-act-reform-a-modern-bill-of-rights-consultation-response> ,

Our College acknowledges the need to treat everyone equally, with fairness, dignity, and respect. Any discriminatory behaviours are challenged, and students are supported to understand how to treat others with respect. The College also has a statutory duty to report and record any of the above incidents. The College will record incidents across the whole spectrum of sexual violence, sexual harassment, and harmful sexualised behaviours so that it can understand the issues and make appropriate plans to reduce them. For more guidance, please see below:

Sexual violence and sexual harassment between children in Colleges and colleges (publishing.service.gov.uk)

## Upskirting

'Upskirting' is where someone takes a picture under a person's clothing (not necessarily a skirt) without their permission and or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress, or alarm. It is a criminal offence. Anyone of any gender, can be a victim. The Voyeurism (Offences) Act, which is commonly known as the Upskirting Act, came into force on 12 April 2019.

## 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. Further information about consent can be found here:

[What is sexual consent? | Rape Crisis England & Wales](#)

## Procedure for dealing with Child-on-Child Sexual Harassment and Violence

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

The College will carefully consider any report of sexual violence and/or sexual harassment. The Safeguarding Team are likely to have a complete safeguarding picture and the DSL (or deputies) will give advice on the college's initial response. 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;
- The nature of the alleged incident(s), including: whether a crime may have been committed and consideration of harmful sexual behaviour;
- The ages of the students involved;
- Any power imbalance between the students. For example, is the alleged perpetrator significantly older, more mature or more confident? Does the victim have a disability or learning difficulty?
- If the alleged incident is a one-off or a sustained pattern of abuse; are there ongoing risks to the victim, other students or college staff?
- Other related issues and wider context; as always when concerned about the welfare of a student, all staff should act in the best interests of the student. In all cases, the College will 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 (and any other students involved/impacted).
- All concerns, discussions, decisions and reasons for decisions should be recorded

**Initial Response:**

The starting point regarding any report should always be that sexual violence and sexual harassment are not acceptable and will not be tolerated. Especially important is not to pass off any sexual violence or sexual harassment as 'banter', 'part of growing up' or 'having a laugh'.

Any report of sexual violence is likely to be traumatic for the victim. However, reports of rape and assault by penetration are likely to be especially difficult with regard to the victim and close proximity with the alleged perpetrator is likely to be especially distressing.

Whilst the college establishes the facts of the case and starts the process of liaising with student's social care and the police, the alleged perpetrator should be removed from any classes they share with the victim. The College should also consider how best to keep the victim and alleged perpetrator a reasonable distance apart on college premises and on transport to and from the College, where appropriate.

These actions are in the best interests of both students and should not be perceived to be a judgment on the guilt of the alleged perpetrator. For other reports of sexual violence and sexual harassment, the proximity of the victim and alleged perpetrator and considerations regarding shared classes, sharing college premises and college transport, should be considered immediately. In all cases, the initial report should be carefully evaluated. The wishes of the victim, the nature of the allegations and the protection of all students in the college will be especially important when considering any immediate actions.

It is important that the College considers every report on a case-by-case basis. When to inform the alleged perpetrator will be a decision that should be carefully considered. Where a report is going to be made to the MASH and/or the police, then, as a general rule, the college should speak to the relevant agency and discuss next steps and how the alleged perpetrator will be informed of the allegations. However, as per general safeguarding principles, this does not and should not stop the College taking immediate action to safeguard the students, where required.

There are four likely scenarios to consider when managing any reports of sexual violence and/or sexual harassment.

**Manage internally:**

- In some cases of sexual harassment, for example, one-off incidents, the College may take the view that the students concerned are not in need of early help or statutory intervention and that it would be appropriate to handle the incident internally, perhaps through utilising our behaviour policy and by providing pastoral support.
- Whatever the College's response, it should be underpinned by the principle that sexual violence and sexual harassment is never acceptable and will not be tolerated.

**Early Help:**

- In line with the above, the College may decide that the students involved do not require statutory interventions, but may benefit from early help. Early help means providing support as soon as a problem emerges, at any point in a student's life. Providing early help is more effective in promoting the welfare of students than reacting later. Early help can be particularly useful to address non-violent harmful sexual behaviour and may prevent escalation of sexual violence.

**Formal Referrals to Social Services:**

- Where a student has been harmed, is at risk of harm, or is in immediate danger, the College should make a referral to the MASH. At the referral stage, the College will generally inform parents or carers, unless there are compelling reasons not to (if informing a parent or carer is going to put the child at additional risk). Any such decision should be made with the support of the relevant external agency.

- If a referral is made, social services will then make enquiries to determine whether any of the students involved are in need of protection or other services. Where statutory assessments are appropriate, the college should be working alongside, and cooperating with, the relevant lead social worker. Collaborative working will help ensure the best possible package of coordinated support is implemented for the victim and, where appropriate, the alleged perpetrator and any other students that require support.
- The College should not wait for the outcome (or even the start) of a social services investigation before protecting the victim and other students in the College. It will be important for the designated safeguarding lead (or a deputy) to work closely with any other agencies as required to ensure any actions the college takes do not jeopardise a statutory investigation. Consideration by the College for safeguarding the victim, alleged perpetrator, any other students directly involved in the safeguarding report and all students at the college should always be immediate.
- In some cases, social services will review the evidence and decide a statutory intervention is not appropriate. The College should be prepared to refer again if they believe the student remains in immediate danger or at risk of harm. If a statutory assessment is not appropriate, the designated safeguarding lead (or a deputy) should consider other support mechanisms such as early help, specialist support and pastoral support.

### **Reporting to the Police**

- Any report to the police will generally be in parallel with a referral to the MASH as above. It is important that the designated safeguarding lead (and their deputies) are clear about the local process for referrals and follow that process. Where a report of rape, assault by penetration or sexual assault is made, the starting point is this should be passed on to the police. Whilst the age of criminal responsibility is ten, if the alleged perpetrator is under ten, the starting principle of reporting to the police remains. The police will take a welfare, rather than a criminal justice, approach.
- At this stage, the College will generally inform parents or carers unless there are compelling reasons not to, for example, if informing a parent or carer is likely to put a student at additional risk. In circumstances where parents or carers have not been informed, it will be especially important that the College is supporting the student in any decision they take. This should be with the support of any appropriate specialist agencies.
- Where a report has been made to the police, the College should consult the police and agree what information can be disclosed to staff and others, in particular, the alleged perpetrator and their parents or carers. They should also discuss the best way to protect the victim and their anonymity.
- All police forces in England have specialist units that investigate child abuse. The names and structures of these units are matters for local forces. It will be important that the designated safeguarding lead (and their deputies) are aware of their local arrangements.
- In some cases, it may become clear very quickly, that the police (for whatever reason) will not take further action. In such circumstances, it is important that the College continues to engage with specialist support for the victim as required.

### **Ongoing response:**

The following principles are based on effective safeguarding practice and should help shape any decisions regarding safeguarding and supporting the victim.

- Consider the age and the developmental stage of the victim, the nature of the allegations and the potential risk of further abuse. The College should be aware that, by the very nature of sexual violence and sexual harassment, a power imbalance is likely to have been created between the victim and alleged perpetrator.

- The needs and wishes of the victim should be paramount (along with protecting the student) in any response. It is important they feel in as much control of the process as is reasonably possible. Wherever possible, the victim, if they wish, should be able to continue in their normal routine. Overall, the priority should be to make the victim's daily experience as normal as possible, so that the college is a safe space for them.
- The victim should never be made to feel they are the problem for making a report or made to feel ashamed for making a report.

Consider the proportionality of the response. Support should be tailored on a case-by-case basis. The support required regarding a one-off incident of sexualised name-calling is likely to be vastly different from that for a report of rape.

Support can include:

- Children and Young People's Independent Sexual Violence Advisors (ChISVAs) provide emotional and practical support for victims of sexual violence. They are based within the specialist sexual violence sector and will help the victim understand what their options are and how the criminal justice process works if they have reported or are considering reporting to the police. ChISVAs will work in partnership with colleges to ensure the best possible outcomes for the victim.
- Police and social care agencies can signpost to ChISVA services (where available) or referrals can be made directly to the ChISVA service by the young person or college. Contact details for ChISVAs can be found at Rape Crisis and The Survivors Trust.
- Child and adolescent mental health services (CAMHS)
- Rape Crisis Centre's can provide therapeutic support for children who have experienced sexual violence.
- Internet Watch Foundation (to potentially remove illegal images).



## Appendix I

### Key Arrangements for Students in College Supported Accommodation

#### **Context:**

The College assists students on the rugby programme with organising off-site residential accommodation if they do not live within a manageable travelling distance. The College itself does not own and run any on-site residential accommodation. The College does however observe the national standards for further education residential accommodation in its monitoring and support of such students. Any student in college supported accommodation must be over the age of 16 on the 1<sup>st</sup> of September in their year of entry. This accommodation is on a weekday basis only with students arriving on a Sunday evening and departing on a Friday morning.

The assistance provided by the College is always subject to market availability. This accommodation comes in two forms, either a homestay arrangement with a host family or a leased room in a private multi-occupancy residence (used exclusively by college students).

The student's contract is directly with the host family or the landlord of the residence and the student and their parents or guardians are responsible for meeting the associated financial obligations. The College will advise on the form of the contract and has thorough-going safeguarding arrangements in place, including in-person house inspections and college-employed staff serving as resident house guardians at multi-occupancy residences.

The College will also ensure that reasonable adjustments are made wherever possible and seek to meet the needs of all students irrespective of considerations such as disability, race, religion, gender identity and sexual orientation. The College cannot however guarantee that facilities will always be available to support individuals with significant medical or other requirements.

#### **The nature of and the extent to which the college inspects and monitors accommodation:**

The College visits and inspects all accommodation each year before offering support for use as a student residence. All necessary legal checks are put in place, such as valid gas certificates and fire risk assessment procedures. The College reserves the right to conduct any further visits and inspections as required. A member of the Safeguarding and Welfare Team visits any multi-occupancy residence each term and meetings are held with all accommodation providers on a termly basis. College staff are in residence at any multi-occupancy accommodation and serve as house guardians providing support to the students throughout each week.

All staff who have responsibility for the care of residential students undertake safeguarding and first aid training, including regular updating. When disabled students are resident, specialist training is undertaken to enhance staff knowledge and understanding about their additional needs. All College staff have an Enhanced Disclosure and Barring Service check in place at the beginning of their employment.

All our host families must undergo an Enhanced Disclosure and Barring Service (DBS) check. The host family must provide an Enhanced DBS certificate, or maintain an equivalent DBS update account, for:

- Each member of the household living in the house who is over 18 years old
- Regular visitors, especially any who stay overnight at the property (adult children, close family friends, grandparents etc).

They will be checked through the Disclosure and Barring Service with a satisfactory outcome known, before any student is placed. If the responsible adults already have Enhanced DBS certificates in place (that are less than three years old and with no breaks in employment or service of more than three months), a student may be provisionally placed before the outcome of the new check is known. This would only occur where it is not possible to avoid significant educational disruption otherwise. The

College requires each member of the host family to complete a short online induction training module on the principles of safeguarding young people and to be fully aware of their Prevent duties.

Host families and college house guardians are in a position of trust, caring for young people who are far from home. They have a duty of care to all students and the need to safeguard and promote their welfare at all times. The College therefore requires that host families, their visitors and house guardians:

- Act in a manner which respects values in relation to gender, religion, belief, age, colour, race, class, sexual orientation and disability.
- Not demean or undermine the students, use swear words in their presence, consume high levels of alcohol, take non-prescription drugs or make these available to students.
- Not have a sexual or physically intimate relationship with the student and make every effort to protect the student from sexual activity with anyone else in the residence. As a general principle, a “no touch” policy should be practiced.
- Not watch or read sexually explicit television programmes, films or magazines in the presence of students. As a general principle, they should keep clear of sexual discussions wherever practical, particularly avoiding innuendo and implication which could be easily misinterpreted by a naïve or immature young adult

#### **An outline of the welfare and support facilities and provision available to students**

The College’s Deputy Principal is designated as the Residential Head and has an appropriate management qualification (Level 5 in Leadership and Management). The Deputy Principal in turn directly line manages the Curriculum Leader for Sport and there is clear leadership and management of the practice and development of residency that ensures effective links are made between academic and residential staff.

The Assistant Principal for Curriculum and Student Experience is designated to take responsibility for the operation of the student safeguarding policy, to liaise with the children’s or adult services (depending upon the age of the student), the designated officer(s) within the local authority, and to coordinate action with these services; and (where applicable) liaise with the police following any allegation or suspicion of abuse or significant harm affecting a student. The Assistant Principal reports to the Deputy Principal and Residential Head. Any safeguarding concerns must be reported to the Assistant Principal or the Safeguarding and Welfare Manager either in person or via the designated safeguarding email address: ‘wecare@henleycol.ac.uk’.

The Student Welfare and Safeguarding Team run an induction session with the students in residential accommodation at the beginning of the year and provide the students with all relevant contact details. A designated member of Welfare and Safeguarding Team acts as a key point of liaison for the students, their parent and guardians, the host families and house guardians on welfare and safeguarding matters. A College Welfare Officer will hold a termly meeting with each student living in accommodation to carry out a welfare check and update the College’s Safeguarding Panel on individual issues at its weekly risk assessment meeting. A counselling service is available through our Welfare service and requests can be made in person or via the designated safeguarding email address: ‘wecare@henleycol.ac.uk’.

All students are allocated a Personal and Professional Development (PPD) Tutor and are required to attend a PPD session once a week. Alongside weekly group sessions, students meet with their PPD Tutor regularly to monitor their progress at college from both an academic and pastoral perspective. The PPD Tutor is the primary point of contact at college for students and their parents or guardians when it comes to academic and pastoral issues. The PPD Tutors and the Tutorial Manager work closely with the Welfare and Safeguarding Team. For teaching and learning matters, the PPD Tutor will refer to the relevant Curriculum Leader as required.

Students on the high performance rugby programme are supported in their fitness and conditioning, as well as injury recovery, by their Coaches and Physiotherapist. Injury recovery is closely tracked and reviewed by the

coaching team and students' fitness to play is regularly assessed. Additionally, the Sports department makes extensive use of Roddy Slater from Raw Mentoring to support the well-being and mental health of students in accommodation. Roddy is a former International Sprinter and has been involved in Sports & Fitness for 26 years. He has been providing mentoring services to vulnerable youth for over 10 years and has coached World Junior Champs to Olympians & Para-Olympians.

Students must provide important medical and health information upon application and enrolment. This will be recorded and stored securely on the college's student registry system. Students should register with the local medical centre when they arrive at their accommodation. Any accommodation must facilities for locating medicines securely, if required.

In multi-occupancy accommodation, the house guardians are on an onsite presence from Sunday to Friday and oversee the good behaviour, safety and welfare of the students. The house guardians check that students are inducted into the health and safety and use of the building, in particular the kitchen, and set expectations on how students live in their rooms and use the kitchen. When the students return to the accommodation, the house guardians oversee dinner and a one-hour study period after dinner. They check to see students are in their own rooms by 9.00pm, in order that the students can get enough rest to be up at 6.00am the next day.

The house guardians liaise with the accommodation manager on day-to-day matters, such as broken equipment, damage or issues relating to keys. In the case of an emergency, the house guardians have access to a College mobile phone, in order to call a student, their parents or guardians, or a member of staff at College. The house guardians' first point of contact is the Head Rugby Coach who is able to contact Deputy Principal and Residential Head or the Assistant Principal and Designated Safeguarding Lead at any time, if an issue needs to be escalated.

For further information, please see the College's Statement of Residential Principles and Practice as well as Guidelines for Host Families and Guidelines for House Guardians.

[Policies \(henleycol.ac.uk\)](https://henleycol.ac.uk)

## Appendix J

### Adults at Risk

**Adult at risk** refers to any person aged 18 years and over who is, or may be, in need of community care services by reason of mental health issues, learning or physical disability, sensory impairment, age or illness and who is, or may be, unable to take care of themselves or unable to protect themselves against significant harm or serious exploitation. This definition further includes people encountering domestic violence, substance misusers and asylum seekers. In line with the Care Act 2014, the following six principles underpin all safeguarding work with Adults at Risk at The Henley College.

#### **Principle 1: Empowerment**

##### **What does this mean?**

People should be supported and encouraged to make their own decisions. This should be done by:

- making services more personal
- giving people choice and control over decisions
- asking people what they want the outcome to be

##### **What does this mean for the adult?**

An Adult at Risk will be asked what they want to happen and the College will plan safeguarding round this.

#### **Principle 2: Prevention**

##### **What does this mean?**

Organisations should work together to stop abuse before it happens by:

- raising awareness about abuse and neglect
- training staff
- making sure clear, simple and accessible information is available about abuse and where people can get help

##### **What does this mean for the adult?**

An Adult at Risk will be given clear and simple information about what abuse is and directed to the appropriate person to ask for help at the College.

#### **Principle 3: Proportionality**

##### **What does this mean?**

When dealing with abuse situations services must ensure that they always think about the risk. Any response should be appropriate to the risk presented. Services must respect the person, think about what is best for them and only get involved as much as needed.

##### **What does this mean for the adult?**

The College will consider what is best for the Adult at Risk and only get involved when there is clear need to.

#### **Principle 4: Protection**

##### **What does this mean?**

Organisations must ensure that they know what to do when abuse has happened by:

- what to do if there are concerns
- how to stop the abuse

- how to offer help and support for people who are at risk

**What does this mean for the adult?**

An Adult at Risk will get help and support to tell relevant people about any abuse and will be able to get involved in the safeguarding process as much or as little as they want.

**Principle 5: Partnership****What does this mean?**

Organisations should work in partnership with each other and local communities. Local people also have a part to play in preventing, detecting and reporting abuse.

**What does this mean for the adult?**

The College's staff will look after an Adult at Risk's personal information and only share it when this helps to keep them safe.

**Principle 6: Accountability****What does this mean?**

Safeguarding is everybody's business. Everyone must accept that they are all accountable as individuals, services and as organisations.

Roles and responsibilities must be clear so that people can see and check how safeguarding is done.

**What does this mean for the adult?**

An Adult at Risk will know what all the different people at the College should do to keep them safe.

## Appendix K

### Digital Safety & Remote Learning

The use of technology has become a significant component of many safeguarding issues. Child sexual exploitation; radicalisation; sexual predation- technology often provides the platform that facilitates harm. An effective approach to online safety empowers the College to protect and educate the whole College community in their use of technology and establishes mechanisms to identify, intervene and escalate any incident where appropriate.

The Henley College identifies that the issues can be broadly categorised into three areas of risk:

- **Content:** being exposed to illegal, inappropriate or harmful material
- **Contact:** being subjected to harmful online interaction with other users
- **Conduct:** personal online behaviour that increases the likelihood of, or causes, harm.

The Henley College recognises the specific risks that can be posed by mobile phones and cameras and in accordance with KCSIE 2021, has appropriate policies in place that are shared and understood by all members of the College Community. Further information about specific approaches relating to this can be found in the College's Online Safety Policy and Remote Learning Policy.

[Policies \(henleycol.ac.uk\)](https://www.henleycol.ac.uk)

As Colleges increasingly work online, it is essential that students are safeguarded from potentially harmful and inappropriate online material. The Henley College will ensure that appropriate filtering and monitoring systems are in place when students and staff access College systems and internet provision. Where students are being asked to learn online at home, College staff and students must follow the College's Remote Learning Policy.

The policy for remote learning that demonstrates an understanding of how to follow safeguarding procedures when planning remote education strategies and teaching remotely. The College maintains the capability to provide remote education when it is not possible for some or all their students to attend in person.

<https://www.gov.uk/government/publications/providing-remote-education-guidance-for-Colleges>

The Henley College acknowledges that while filtering and monitoring is an important part of College's online safety responsibilities, it is only one part of our approach to online safety. Students and adults may have access to systems external to the College control such as mobile phones and other internet enabled devices and technology and where concerns are identified appropriate action will be taken. The UK Safer Internet Centre has published guidance as to what "appropriate" filtering and monitoring might look like:

UK Safer Internet Centre: appropriate filtering and monitoring.

The important guidance below designed to help parents and carers to keep their children as safe as possible when online:

Internet safety advice | Oxfordshire County Council

#### **Use of Microsoft Teams:**

Teams has become the College's primary virtual learning platform and the chief means for distributing learning materials to groups of students. This platform must be used responsibly and to share only appropriate educational resources.

The associated chat function must be used with care, especially if using the Teams App on a mobile device. The design and structure of a chat function can encourage more informal communication; use of language and

tone need to be carefully monitored and always appropriate to an educational setting. Any communication between students and teachers on Teams Chat should be limited to college hours and focused only on college-related matters.

Outside of a lockdown context, the use of Teams for 1:1 meetings between teachers and students should be limited to where students are unable to attend college due to self-isolation or transport issues. The teacher should be located in the college and visible to other staff in the same way as if conducting a normal face to face 1:1 with a student. The guidance within the College's online safety policies must be closely adhered to in such meetings.

## Appendix L

### **Pre-Appointment Checks and Safer Recruitment**

Any offer of appointment made to a successful candidate, including one who has lived or worked abroad, must be conditional on satisfactory completion of the necessary pre-employment checks.

When appointing new staff, the College will:

- verify a candidate's identity. Identification checking guidelines can be found on the GOV.UK website
- obtain (via the applicant) an enhanced DBS certificate (including barred list information, for those who will be engaging in regulated activity)
- obtain a separate barred list check if an individual will start work in regulated activity before the DBS certificate is available
- the College must recognise that the 'relationships and associations' that staff have in College and outside (including online), may have an implication for the safeguarding of children in the College. Where this is the case, the member of staff must speak to the College (Childcare Act 2006 – as amended)
- verify the candidate's mental and physical fitness to carry out their work responsibilities. A job applicant can be asked relevant questions about disability and health to establish whether they have the physical and mental capacity for the specific role
- verify the person's right to work in the UK. If there is uncertainty about whether an individual needs permission to work in the UK, follow advice on the GOV.UK website.
- if the person has lived or worked outside the UK, make any further checks the College or college consider appropriate and verify professional qualifications, as appropriate
- carry out prohibition check for all staff with QTS
- complete a risk assessment for each volunteer to decide whether they need to do an enhanced DBS check or not. (Please note even if it is decided an enhanced DBS is to be requested, if the volunteer is not in regulated activity, then you're not legally allowed to do a barred list check)
- consider carrying out an online search on shortlisted candidates to help identify any issues that are publicly available online.



## Appendix M

### Single Central Record

The College keeps a single central record. The single central record covers all staff (including supply staff, and teacher trainees on salaried routes) who work at the College

The information that must be recorded in respect of staff members (including teacher trainees on salaried route) is whether the following checks have been carried out or certificates obtained, and the date on which each check was completed/certificate obtained:

- an identity check / a barred list check / an enhanced DBS check/certificate / a prohibition from teaching check.
- further checks on people who have lived or worked outside the UK; this would include recording checks for those EEA teacher sanctions and restrictions
- a check of professional qualifications; and a check to establish the person's right to work in the United Kingdom.

For supply staff, the College will also include confirmation that the employment business supplying the member of supply staff has carried out the relevant checks and obtained the appropriate certificates, whether any enhanced DBS check certificate has been provided in respect of the member of supply staff, and the date that confirmation was received.

A record of staff leavers must be maintained on the Single Central record.

Governors are required to have an enhanced criminal records certificate from the DBS. It is the responsibility of the governing body to apply for the certificate for any of their governors who does not already have one. Governance is not a regulated activity and so they do not need a barred list check unless, in addition to their governance duties, they also engage in regulated activity.

The SCR shall be updated in the light of any further legislation.