

<b>Process for: EDS 1.2</b>	<b>Safeguarding Policy and Procedure (including Child Protection and the Prevent Strategy) September 2021</b>
Process owner:	Assistant Principal Foundation Learning /Student Voice
To ensure that:	Learners and staff have a safe learning and/or working environment: that they feel safe; they know how to keep themselves safe and know the procedures to follow in the event of any concerns. This includes any concerns relating to the Prevent agenda.
Which applies to:	All staff, learners and all stakeholders.
Monitoring and evaluation:	Regular reports and reviews to EMT and CMT and through an Annual Equality & Diversity/Safeguarding Report which goes to Governors.

<b>Section A : Safeguarding Policy: Introduction</b>	
1.1	The Corporation of Basingstoke College of Technology has a statutory and moral duty to safeguard the welfare of children and adults at risk (vulnerable) receiving education, training and care at the college.
1.2	The college's policy is that safeguarding all its people both learners and staff, will be central to all it does. This covers all matters connected with learners and staff having a safe learning and/or working environment, ensuring that they know how to keep themselves safe and that they feel safe. It pays particular regard to the welfare of young people under the age of 18 and to that of adults at risk.
1.3	<p>The purpose of this document is to outline the policy and procedures for safeguarding children and adults at risk at the college and aims to:</p> <ul style="list-style-type: none"> <li>• Promote safe practices and challenge poor and unsafe practice</li> <li>• Ensure that all staff are aware of the Prevent agenda and have an understanding that any concerns they have are raised in the same way that all safeguarding concerns are raised</li> <li>• Ensure staff receive adequate training and supervision</li> <li>• Identify instances in which there are grounds for concern about the welfare of a child or adult at risk and take action to ensure safety</li> <li>• Take appropriate action to prevent unsuitable people from working with children, young people and adults at risk</li> <li>• Develop a pro-active culture in which both learners and staff are aware of the actions they need to take to become and remain safe</li> </ul>
1.4	<p>In pursuit of these aims the Board of Corporation will approve and annually review policies and procedures relating to safeguarding with the aim of:</p> <ul style="list-style-type: none"> <li>• Raising awareness of issues relating to the welfare of children, young people and adults at risk and the promotion of a safe environment for the children and young people learning within the college;</li> <li>• Aiding the identification of children and young people at risk of significant harm and providing procedures for reporting concerns;</li> <li>• Establishing procedures for reporting and dealing with allegations of abuse against members of staff; and</li> <li>• The safe recruitment of staff.</li> </ul>
1.5	<p>This policy and procedure must be seen in the context of supporting our learners by:</p> <ul style="list-style-type: none"> <li>• Being healthy</li> <li>• Staying safe; (this includes having due regard to the Prevent agenda and ensuring students are not at risk of radicalisation)</li> <li>• Enjoying and achieving</li> <li>• Making a positive contribution</li> </ul>

	<ul style="list-style-type: none"> <li>• Achieving economic wellbeing</li> <li>• Promoting British Values</li> </ul>
1.6	Safeguarding children, young people and adults at risk covers more than child protection. Issues such as health and safety, dealing with bullying, E-safety, arrangements to meet the needs of children with medical conditions, providing first aid and other such requirements must also be taken into account.
1.7	The following policy and procedure has been written with the guidance of the Hampshire Safeguarding Children Partnership (HSCB). <a href="https://www.hampshirescp.org.uk/">https://www.hampshirescp.org.uk/</a>

<b>Scope</b>	
2.1	This policy and its procedures apply to all staff, visitors, contractors and volunteers at the college.
2.2	This policy applies to all learners with particular reference to children and young people and with appropriate adaptations to the protection of adults at risk. The Children Act 1989 defines a child as a person under the age of 18. This is regardless of domicile, marital status or any legal orders in force. The Children Act 2004 also includes young people under 21 who have a learning or other disability or who have been looked after by a local authority after the age of 16 and vulnerable adults (an adult who does not have the mental ability to make their own decisions). Amendments to the Safeguarding Vulnerable Groups Act 2006, by the Protection of Freedoms Act 2012, adults are no longer deemed vulnerable because of their personal attributes, characteristics or abilities. An adult is considered 'vulnerable' if they receive a health, personal or social care service from a professional.
2.3	As part of safeguarding the college has a Prevent Strategy and action plan which should be read in conjunction with this policy (Appendix 14)
2.4	This document is to be read in conjunction with other college policies which are designed to ensure the safety and protection of all individuals who access the college facilities. The additional policies address the safety of the building, arrangements for safe evacuation of the building, procedures for dealing with incidents, first aid arrangements, staff training, mechanisms for protection of information and policies encouraging a focus on long-term health and the environment. A list of relevant policies is provided on dashboard, this policy also takes into account statutory guidance, links in Appendix 8.
2.5	In respect of this policy the Board of Corporation recognises the classifications in Appendix 1 as categories of abuse which relate to Child Protection as significant harm and form the basis of other causes of concern.

<b>Statutory responsibilities and background/Equality &amp; Diversity</b>	
3.1	<p>The policy and procedure which follows has been drawn up in accordance with the requirements of the:</p> <ul style="list-style-type: none"> <li>• Education Act 2011</li> <li>• Department of Education's document 'Keeping Children Safe in Education' September 2021, which replaces Keeping Children Safe in Education (March 2015) and Safeguarding Children and Safer Recruitment in Education (December 2006).</li> </ul> <p><i><a href="#">Information sharing: advice for practitioners providing safeguarding services</a></i></p>
3.2	Under the Education Act, FE colleges have a statutory duty to assist Children's Services on child protection issues and to take all reasonable measures to ensure that risks of harm to children's welfare are minimised.
3.3	The Sexual Offences Act 2003 makes it an offence for a person over 18 (e.g. a lecturer or other member of staff/contractor/volunteer/visitor) to have a relationship with a child under 18 where the person is in a position of trust in respect of that child, even if the relationship is consensual. This applies where the child is in full-time education and the person works in the same establishment as the child, even if they do not teach the child.

3.4	The responsibility for protecting children does not rest with any one agency as Education, Children's Services, NSPCC, Police, Health Service, Probation Service and the Armed Services are all involved in child protection. <b>BCoT acknowledges that it is not the college's role to investigate whether abuse has taken place</b> as only Children's Services, the Police and NSPCC have the statutory powers. The college does recognise, however, that children have the right to be protected from harm and that it has a duty to act if there is a cause for concern and to notify the appropriate agencies so that they can investigate and take necessary actions. A failure to pass on information that might prevent a tragedy could expose the college to criticism.
3.5	A member of the Board of Corporation is appointed with special responsibility for safeguarding and child protection issues.
3.6	A member of Executive Management Team (EMT), the Assistant Principal for Foundation Learning and Student Voice (AP), is identified as the EMT Safeguarding Lead.
3.7	A member of staff, the Transition Manager, is identified as the Designated Person (DP) whose role is to advise staff, liaise with appropriate external agencies and record and report cases for investigation.
<b>Statutory responsibilities and background/Equality &amp; Diversity</b>	
3.8	BCoT has a team of Designated Safeguarding Officers (DSO) consisting of the EMT Safeguarding Lead, Designated Person, Transition Manager, Course Director for Specialist Provision and Careers and Employability Team Leader, all of whom have the ability to record and report information to the appropriate authorities.
3.9	The DSO team will raise awareness of safeguarding issues relating to child protection, health and safety, bullying, cyber-bullying, security and the Prevent agenda in order to ensure that learners are being kept as safe as possible. The team will help with Staying Safe events and activities, embed awareness in the curriculum and be a point of contact for safeguarding issues which are not child protection issues.
3.10	The college has a well-developed system of learner consultation through Learner Parliament. The inclusion of safeguarding as an agenda item for Learner Parliament meetings is an important part of embedding this strategy. A team of student representatives is included in annual review of this policy through consultation.
3.12	All members of staff have a duty to ensure the welfare of the child, young person or vulnerable adult (as defined above) is the primary consideration above all others and to report suspected or alleged abuse to the Designated Safeguarding Officers for safeguarding issues.
3.13	A common secure reference point will be established in the Hub for the collation of information causing concern about safeguarding which is not a child protection issue. This is to ensure that safeguarding concerns do not spiral out of control. The Safeguard system is to be used for recording this information (link available on staff intranet).
3.14	<b>Confidentiality</b>  We maintain that all matters relating to child protection are to be treated as confidential and a shared as per the 'Information Sharing Advice for Practitioners' (DfE 2015) guidance. There is a lawful basis for child protection concerns to be shared with agencies who have a statutory duty for child protection. Information will be shared with individuals within the school on a 'need to know' basis. All staff are aware that they cannot promise a child to keep a disclosure confidential.

<b>Staff Responsibilities</b>	
4.1	All those working at BCoT must be familiar with and follow the college's procedures and protocols for promoting and safeguarding the welfare of children in the college and know who to contact to express concerns about a child's welfare. This is discussed in the staff inductions and promoted through the weekly all staff emails. Documents relating to safeguarding can be found on the staff intranet and published on the college website.
4.2	Where staff are involved in delivering learning to students attending college who are aged between 14 and 16 they should recognise that all policies relating to safeguarding apply to these students, but that additional reference may need to be made to the AP.
4.3	A summary document for staff (Appendix 5) highlights the key points, contacts and procedures relating to safeguarding for use on a day to day basis.
4.4	Tutors should also ensure that students are aware of their rights under the children acts and of the college's position on issues of child protection. An early tutorial on this topic must form part of the student induction process.
4.5	All staff must embed safeguarding issues within the vocational curriculum.
4.6	All BCoT staff must be alert to, and aware of, the signs of abuse which may raise concern about child protection. Abuse or neglect can be by inflicting harm, or by failing to act to prevent harm. Signs may include changes in behaviour or a failure to perform or develop as expected. However, recognising abuse can be difficult; therefore staff need to take notice of not only major incidents but also signals which cause concern. <i>All</i> such concerns should be recorded and discussed with the designated person to decide on which action to take:  <b>report</b> <b>monitor</b> <b>take no further action</b>
4.7	<b>Referral</b>  Any member of staff can make a referral to Children's or Adult Social Services; however, all reports should be documented on the Safeguard system. Designated Safeguarding Officers should be the ones to gather and examine all relevant testimony and information.
4.8	It is illegal for any member of staff to have a (sexual) relationship with a student who is under 18. It is therefore clearly unacceptable for any member of staff to be in such a relationship, or to put themselves in a situation where such a relationship might develop. It is also good practice to adopt the same policy for full-time learners aged over 18. Staff must also take responsibility to protect themselves by avoiding, to the extent possible situations which could give rise to allegations of inappropriate behaviour. Socialising with full-time learners in anything other than a work context (including via social media networks) is therefore not permitted.
4.9	It is recognised however that, especially with adult learners on part-time courses, social relationships may either pre-exist between staff and student or could develop as a result of the interaction at college. In all such cases, the relationship must be disclosed to the EMT Safeguarding Lead or the designated person, who will consider each situation on its own facts, and will provide advice as necessary.
4.10	It is also recognised that apprentices employed by BCoT are both staff members and students, and that it is therefore quite possible that an apprentice will be in a peer group of learners, some or all of whom may be under 18. Friendships are very likely to develop in this situation and any ensuing relationship which goes further than normal socialising in college within the course group must be disclosed to the EMT Safeguarding Lead.

4.11	<p>It is the RAP tutors responsibility to monitor and follow up on absence in line with the Attendance &amp; Punctuality Policy.</p> <p>If a student is reported as missing to the college by a family member, police or external agency (including Channel) then the details must be obtained and passed to a DSO team member. No details must be released by the person receiving the telephone call in line with our Data Protection Policy. The DSO will then make contact with the person making the report and verify identity before providing information which may be required. Care must be taken not to disclose information to a family member where the student may have left due to difficulties in the home, eg domestic abuse or forced marriage.</p> <p>The DSO will work with colleagues and students in the college to help support the safe location and wellbeing of the student. The DSO will inform and update the Principal and Head of Marketing.</p>
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**Prevent (concerns about extremism/radicalisation)**

4.11	<p><b>Reporting Concerns</b></p> <p><b>Early reporting</b> of any concern however trivial is essential to prevent escalation in the case of an actual threat/risk. The college DSOs are the first point of contact for staff where concerns have been raised. The college PREVENT lead is the college Safeguarding Lead – AP. College Safeguarding Officers have links with Regional Prevent Co-ordinators and specialist police advisors via a regional ‘Channel Co-ordinator’.</p> <p><b>Observation</b> of changes in learner behaviour, particularly in those students who are most at risk due to their culture or religion. Staff should be aware of changes in learner behaviour, particularly isolation or withdrawal from activities previously enjoyed. In this instance, speak with the student to try to establish the cause – if in doubt, seek advice. Any unexplained absences where the learner cannot be contacted or the family are unable to satisfactorily explain the student’s absence or state their whereabouts, should be followed up by a Safeguarding Officer.</p> <p><b>External Influences</b> - report any literature whether in the form of books, leaflets or posters that promote extremist activities to the Lead Safeguarding Officer – AP.</p>
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**Staff Recruitment**

5.1	The college is committed to a policy of responsible recruitment which includes procedures for obtaining DBS checks for new employees. From April 2009 all existing employees were required to obtain DBS clearance.
5.2	The senior member of staff responsible for recruitment and training needs of staff is the Head of Human Resources
5.3	The Head of Human Resources is responsible for ensuring that all DBS checks are undertaken and for ensuring that all staff receive basic training in child protection issues and are aware of the college child protection procedures.
5.4	<p>Inevitably, some staff, including many (if not most) new sessional/casual staff will have started work before the DBS disclosure has been processed by DBS and their clearance received in HR.</p> <p>Line managers/heads must therefore maintain “heightened supervision” on these staff until HR confirms that a satisfactory DBS report has been received. This “heightened supervision” should reflect what is known about the person, their experience, the nature of their duties and level of responsibility. A formal risk assessment should be completed by the Faculty Head and returned to HR.</p>

<b>Staff Training</b>	
6.1	The Board of Corporation is responsible for ensuring that members of staff are suitably trained and that internal procedures are current, adhered to, and conform to HSCB procedures.
6.2	<p>At the initial staff induction new members of staff should be informed of the importance of safeguarding (incorporating Prevent), its inclusion of Health and Safety, bullying, cyber-bullying and security and that further formal training will be part of their induction. The initial statement will be:</p> <p>Safeguarding is hugely important for all at college. It includes the right of every individual to feel safe and the duty of every member of staff to ensure safety. All new staff must receive safeguarding awareness training and existing staff must attend a refresher session every year. In addition to this all staff will have a refresher on new guidance as it arises such as Keeping Children Safe in Education part 1 2016. (amended July 2021)</p>
6.3	The DSO team as indicated in this policy will have completed basic child protection and safeguarding training, refreshed annually.
6.4	A system for ensuring both initial and refresher staff training in safeguarding is in place and provided as Appendix 8. All new staff must receive safeguarding awareness training and existing staff must complete the refresher training annually.

<b>Section B : Procedure where a child protection issue is identified</b>	
<b>For Cases not Involving Allegations against a Member of Staff</b>	
<b>Guidelines for staff:</b>	
1	Promises of confidentiality should not be given as the matter may develop in such a way that these cannot be honoured. If the complainant is the student him/herself, questions should be kept to the minimum necessary to understand what is being alleged and leading questions should be avoided. Care must be taken in asking or interpreting responses to questions about indications of abuse as this could have an effect on the evidence which is put forward if there are any subsequent legal proceedings. Copies of reports, information, etc., should be kept securely locked at all times.
2	Such an allegation, suspicion or incident of abuse must be reported to the designated person as soon as possible and in any event within two hours of the initial report. If the designated person cannot be contacted within the timescale the report must be made to a DSO. If none of the above can be contacted it falls to the Duty Manager.
3	<p>A full written record should be made as soon as possible of the nature of the allegation and any other relevant information on the Safeguard system - link available on the staff intranet. In the report the following details will be required:</p> <ul style="list-style-type: none"> <li>• the date</li> <li>• the time</li> <li>• the place where the alleged abuse happened</li> <li>• the name of the complainant and, where different, the name of the child who has allegedly been abused</li> <li>• the nature of the alleged abuse</li> <li>• a description and diagram of any injuries observed (on a separate sheet of paper)</li> <li>• the account which has been given of the allegation</li> <li>• the account of the action taken by the staff member involved</li> <li>• name of others present, both at the interview with the student and, if known, at the time of the alleged abuse.</li> </ul>

4	<p>If the decision is taken to report the matter to Children or Adult Social Services, the DSO shall:</p> <ul style="list-style-type: none"> <li>• contact the professional telephone number at Hampshire County Council (HCC) or the police by telephone, keeping a written record of the date and time of the report and of the name/position of the person to whom the report was made</li> <li>• confirm the telephone report in writing within 24 hours</li> <li>• discuss with Hampshire County Council/police what action will be taken to inform the parents of the student</li> <li>• make a note of the conversation, sign and date it in black ink</li> <li>• maintain communication with HCC or police to ascertain what steps they will be taking and keep the student and staff member informed</li> <li>• ensure that the student and member of staff are offered counselling</li> <li>• notify the Principal within 24 hours that a suspected child protection case has been reported and keep them informed of progress</li> <li>• Retain a copy of the report and any other relevant material for a period of seven years.</li> </ul>
5	<p>If a BCoT apprentice discloses information, or there is a suspicion of abuse whilst in the workplace, the member of BCoT staff should follow the college's Safeguarding Policy and Procedure in the same way as for a full time student.</p>

<b>For Cases Involving Allegations against a Member of Staff</b>	
	<p><b>Guidelines for staff:</b></p> <p>It is important to differentiate between allegations, complaints and concerns.</p> <p>Allegations as defined by KCSiE should be reported to the Local Authority Designated Officer (LADO). Complaints or concerns can be managed independently by the college under internal procedures.</p> <p>Complaints could include:-</p> <ul style="list-style-type: none"> <li>• Breaches of the Code of Conduct</li> <li>• Failure to follow policy, procedure or guidance</li> <li>• Any breach of data protection or confidentiality</li> <li>• Poor behaviour management</li> <li>• Inappropriate use of social media</li> <li>• Misadministration of medication</li> </ul> <p>Concerns could include:-</p> <ul style="list-style-type: none"> <li>• Inappropriate use of language, shouting or swearing</li> <li>• Discussing personal or sexual relationships with, or in the presence, of students</li> <li>• Making (or encouraging others to make) unprofessional comments which scapegoat, demean or humiliate children, or might be interpreted as such.</li> </ul>
1	<p>Any suspicion, allegation or actual abuse of a child by a member of staff must be reported to:</p> <ul style="list-style-type: none"> <li>• The safeguarding lead within two hours of the initial concern arising; if they are not contactable within two hours, or is the subject of the allegation or complaint, the matter must be reported directly to a Deputy Principal.</li> </ul>

2	<p>On being notified of any such matter the safeguarding lead or Deputy Principal, as appropriate, must:</p> <ul style="list-style-type: none"> <li>• notify the Principal and Head of HR</li> <li>• take such steps as they consider necessary to ensure the safety of the student in question and any other student who may be at risk</li> <li>• report the matter to the local Children’s Services Department in accordance with the procedure above</li> <li>• ensure that a report of the matter is completed by the person who reported the original concern within 48 hours.</li> </ul>
3	<p>On being notified of the allegation the Principal will take into account:</p> <ul style="list-style-type: none"> <li>• the seriousness of the allegation</li> <li>• the risk of harm to the student concerned or to other students</li> <li>• the possibility of tampering with evidence</li> <li>• the interests of the member of staff concerned and the college</li> <li>• make contact with the LADO</li> </ul>
4	<p>The Principal will then decide on the appropriate action(s) from the following options:</p> <ul style="list-style-type: none"> <li>• False – there is sufficient evidence to disprove the allegation and take no action, the exonerate the member of staff</li> <li>• Malicious – there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive</li> <li>• Substantiated - if there is sufficient evidence to warrant an investigation, to conduct such an investigation in accordance with the procedure in the college Staff Disciplinary Policy and Procedure, to suspend the member of staff immediately since the substance of the evidence/ the nature of the allegation is sufficient to make this desirable in the interest of the protection of students and/or staff. To initiate action under Stage 4 of the college Staff Disciplinary Policy and Procedure.</li> <li>• Unsubstantiated: there is insufficient evidence to either to prove or disprove the allegation. The term, therefore, does not imply guilt or innocence</li> </ul>
5	<p>In all cases of accusations against staff, the member of staff will be offered access to the college counsellors and/or to an external counsellor.</p>
6	<p>Where it is subsequently found that an allegation was made with malice and aforethought, the college may wish to invoke disciplinary procedures against the accuser.</p>
7	<p>In the event of a police investigation being undertaken, the member of staff will be suspended and any internal investigation and/or disciplinary action may be postponed pending the outcome of the external investigation. At all times accordance with Keeping Children Safe in Education (2021) should be met.</p>



## Whistleblowing in a Safeguarding Context

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.

**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.

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 Assistant Principal aware.

If your concern is about the Assistant Principal, you should raise this with the Principal.

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 email [help@nspcc.org.uk](mailto:help@nspcc.org.uk). For local matter you can contact with Hampshire County Council.

If you believe that a member of the college staff is harming a child (an allegation) and this has been reported to the Assistant Principal and no / insufficient action has been taken, or the member of staff you have concerns about is the Assistant Principal or Principal then you contact the Chair of the Corporation.

If you believe that a child is being abused by individuals outside the college, you are able to make a referral to Children's Social Services by calling 0300 555 1384 (office hours) or 0300 555 1373 (outside of office hours).

## 'County Lines'

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

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

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

See KCSIE 2021

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1007260/Keeping\\_children\\_safe\\_in\\_education\\_2021.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1007260/Keeping_children_safe_in_education_2021.pdf)

## **Modern Slavery**

Modern Slavery is serious crime that violates human rights.

Key points:

- Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour.
- Human trafficking consists of three basic components: action, means and purpose of exploitation. All three components must be present in an adult trafficking case; for child trafficking the 'means' component is not required.
  - In human trafficking cases, exploitation can take many forms, including: sexual exploitation, forced labour, slavery, servitude, forced criminality and removal of organs.
  - Some people may not be victims of human trafficking but still victims of modern slavery if they have been subject to slavery, servitude and forced or compulsory labour.
  - Human trafficking is not the same as human smuggling. There are common myths about modern slavery, such as misconceptions that UK nationals cannot be victims and that a person cannot be a victim if they reject offers of help.

### **CCE – Child Criminal exploitation**

'Child Criminal Exploitation is common in county lines and occurs where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child or young person under the age of 18. The victim may have been criminally exploited even if the activity appears consensual. Child Criminal Exploitation does not always involve physical contact; it can also occur through the use of technology.'

### **CSE – Child Sexual exploitation**

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

**We are all responsible for being vigilant and raising any concerns through the safeguarding channels. More information about Modern Slavery is below**

<https://www.gov.uk/government/publications/modern-slavery-how-to-identify-and-support-victims>

## Appendices

Appendix 1 : Contextual Safeguarding

Appendix 2: Categories of abuse which relate to Child Protection

Appendix 3: Keeping Children Safe in Education Part 1

Appendix 4: Prevent Duty

Appendix 5: Actions to take if you think a child is being abused

Appendix 6 : Peer on Peer allegations

Appendix 7: Roles of staff with designated responsibilities for Child Protection

Appendix 8: List of college policies relating to safeguarding

Appendix 9: Safeguarding – Risks associated with recruitment

Appendix 10: Training staff in safeguarding

Appendix 11: Guidance on wearing of lanyards

Appendix 12 – Brooke Traffic Light information and risk assessment

Appendix 13 – Response to COVID

Appendix 14 – Prevent strategy and action plan

### **Contextual Safeguarding**

In KCSiE 2020 the DfE refer to contextual safeguarding as a specific term that has come out of research from the University of Bedfordshire.

*The definition of Contextual Safeguarding is “an approach to understanding, and responding to, young people’s experiences of significant harm beyond their families. It recognises that the different relationships that young people form in their neighbourhoods, schools and online can feature violence and abuse. Parents and carers have little influence over these contexts, and young people’s experiences of extra-familial abuse can undermine parent-child relationships. Therefore children’s social care practitioners need to engage with individuals and sectors who do have influence over/within extra- familial contexts, and recognise that assessment of, and intervention with, these spaces are a critical part of safeguarding practices. Contextual Safeguarding, therefore, expands the objectives of child protection systems in recognition that young people are vulnerable to abuse in a range of social contexts.”*

As a college, we will consider the various factors that have an interplay with the life of any student about whom we have concerns within the college and the level of influence that these factors have on their ability to be protected and remain free from harm particularly when it comes to child exploitation or criminal activity.

While this term applies to this specific definition, the notion of considering a child within a specific context is also important. What life is like for a child outside of the college, within the home, within the family and within the community are key considerations when the DSL is looking at any concerns.

**Young Person:**

**Physical Abuse** may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child/ young person.

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

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

It may also include neglect of or unresponsiveness to, a child's basic emotional needs.

**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/ young person in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

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

**Prevention of Abuse** The college will identify and provide opportunities for young people to develop skills, concepts, attitudes and knowledge to promote their safety and well-being, by addressing relevant issues in tutorials and other areas of the curriculum.

**Adults:**

**Physical Abuse** This includes hitting, slapping, pushing, kicking, rough handling or unnecessary physical force either deliberate or unintentional, misuse of medication, restraint or inappropriate sanctions.

**Sexual Abuse** This includes rape and sexual assault or sexual acts to which the vulnerable adult has not consented, or could not consent to, or was pressured into consenting. Sexual abuse can occur between people of the same sex and it can also occur within a marriage or any long-term relationship. A relationship

of trust should exist between a member of staff or a volunteer and the person for whom they are caring. It would be seen as a betrayal of that trust, and therefore abusive, for that member of staff or volunteer to have a sexual relationship with the person for whom they care.

**Psychological Abuse** This includes emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, isolation or withdrawal from services or supportive networks.

**Financial or Material Abuse** This includes theft, fraud, exploitation, pressure in connection with wills, property, enduring power of attorney, or inheritance or financial transactions, or the inappropriate use, misuse or misappropriation of property, possessions or benefits.

**Neglect and Acts of Omission** This includes ignoring or withholding medical or physical care needs, failure to provide access to appropriate health, social care or educational services, the withholding of the necessities of life, such as medication, adequate nutrition, clothing and heating.

**Discriminatory Abuse** This includes racist, sexist, or other forms that are based on a person's disability and other forms of harassment, or similar treatment.

**Self-Neglect** This is not a direct form of abuse but staff need to be aware of it in the general context of risk assessment/risk management and to be aware that they may owe a duty of care to a vulnerable individual who places him/herself at risk in this way.

#### **Other forms of Concern:**

- Bullying
- Substance Abuse
- Domestic Violence
- Radicalisation & Extremism PREVENT

The Prevent strategy, launched in 2007, seeks to stop people becoming terrorists or supporting terrorism. It is the preventative strand of the government's counter-terrorism strategy (CONTEST). Objectives of the Prevent strategy are to:

- respond to the ideological challenge of terrorism and the threat from those who promote it
- prevent people from being drawn into terrorism and ensure that they are given appropriate advice and support
- work with sectors and institutions where there are risks of radicalisation that we need to address

If there are concerns that a student is becoming radicalised and involved in an organisation which could ultimately harm the student and the community, this concern needs to be reported to the Designated Safeguarding Officer.

#### **Forced Marriage**

Forced marriages are marriage relationships conducted without the valid consent of both parties, where duress is a factor. If there are concerns that a student is in danger of a forced marriage the Designated Safeguarding Officer will follow government guidelines and contact will be made with the 'Forced Marriage Unit'. Arranged marriage is an entirely separate issue and must not be confused with forced marriage.

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

The World Health Organisation definition of FGM: "All procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs for non – medical reasons."

FGM is illegal in the UK. Anyone who commits FGM faces up to 14 years in prison, a fine, or both. Also anyone found guilty of failing to protect a girl from risk of FGM faces up to 7 years in prison, a fine, or both.

### **Financial Abuse or Material Abuse**

Including theft, fraud, exploitation, pressure in connection with wills, property or inheritance or financial transactions or the misuse or misappropriation of property, possessions or benefits.

### **Child Sexual Exploitation**

Child sexual exploitation is illegal activity by people who have power over children and young people and use it to sexually abuse them.

This can involve a broad range of exploitative activity, from seemingly 'consensual' relationships and informal exchanges of sex for attention, accommodation, gifts or cigarettes, through to very serious organised crime. Children and young people at risk of sexual exploitation are some of the most vulnerable in our society. Many have experienced abandonment or have suffered from physical and mental abuse.

If you become aware of or suspect that a student is being sexually exploited this needs to be reported to the DSO using the safeguarding procedures outlined.

**Upskirting** is a highly intrusive practice, which typically involves someone taking a picture under another person's clothing without their knowledge, with the intention of viewing their genitals or buttocks (with or without underwear).

It can take place in a range of places. British Transport Police have seen a rise of reports on public transport.

The new law will capture instances where the purpose of the behaviour is to obtain sexual gratification, or to cause humiliation, distress or alarm.

Anyone, and any gender, can be a victim.

## 2021 KCSIE

### Part one: Safeguarding information for all staff

#### What school and college staff should know and do

##### A child centred and coordinated approach to safeguarding

1. Schools and colleges and their staff are an important part of the wider safeguarding system for children. This system is described in the statutory guidance [Working Together to Safeguard Children](#).
2. Safeguarding and promoting the welfare of children is **everyone's** responsibility. **Everyone** who comes into contact with children and their families has a role to play. In order to fulfil this responsibility effectively, all practitioners should make sure their approach is child-centred. This means that they should consider, at all times, what is in the **best interests** of the child.
3. No single practitioner can have a full picture of a child's needs and circumstances. If children and families are to receive the right help at the right time, **everyone** who comes into contact with them has a role to play in identifying concerns, sharing information and taking prompt action.
4. Safeguarding and promoting the welfare of children is defined for the purposes of this guidance as:
  - protecting children from maltreatment;
  - preventing the impairment of children's mental and physical health or development;
  - ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and
  - taking action to enable all children to have the best outcomes.
5. Children includes everyone under the age of 18.

##### The role of school and college staff

6. School and college staff are particularly important, as they are in a position to identify concerns early, provide help for children, promote children's welfare and prevent concerns from escalating.



7. **All** staff have a responsibility to provide a safe environment in which children can learn.

8. **All** staff should be prepared to identify children who may benefit from early help.<sup>4</sup> Early help means providing support as soon as a problem emerges at any point in a child's life, from the foundation years through to the teenage years.

9. **Any staff member** who has **any** concerns about a child's welfare should follow the processes set out in paragraphs 55-70. Staff should expect to support social workers and other agencies following any referral.

10. Every school and college should have a designated safeguarding lead who will provide support to staff to carry out their safeguarding duties and who will liaise closely with other services such as children's social care.

11. The designated safeguarding lead (and any deputies) are most likely to have a complete safeguarding picture and be the most appropriate person to advise on the response to safeguarding concerns.

12. The Teachers' Standards 2012 state that teachers (which includes headteachers) should safeguard children's wellbeing and maintain public trust in the teaching profession as part of their professional duties.<sup>5</sup>

### What school and college staff need to know

13. **All** staff should be aware of systems within their school or college which support safeguarding and these should be explained to them as part of staff induction. This should include the:

- child protection policy, which should amongst other things also include the policy and procedures to deal with peer on peer abuse;
- behaviour policy (which should include measures to prevent bullying, including cyberbullying, prejudice-based and discriminatory bullying);<sup>6</sup>
- staff behaviour policy (sometimes called a code of conduct);
- safeguarding response to children who go missing from education; and
- role of the designated safeguarding lead (including the identity of the designated safeguarding lead and any deputies).

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<sup>4</sup> Detailed information on early help can be found in Chapter 1 of [Working Together to Safeguard Children](#).

<sup>5</sup> The [Teachers' Standards](#) apply to: trainees working towards QTS; all teachers completing their statutory induction period (newly qualified teachers [NQTs]); and teachers in maintained schools, including maintained special schools, who are subject to the Education (School Teachers' Appraisal) (England) Regulations 2012.

<sup>6</sup> All schools are required to have a behaviour policy (full details are [here](#)). If a college or chooses to have a behaviour policy it should be provided to staff as described above.

Copies of policies and a copy of Part one (or Annex A, if appropriate) of this document

should be provided to **all** staff at induction.

14. **All** staff should receive appropriate safeguarding and child protection training (including online safety) at induction. The training should be regularly updated. In addition, all staff should receive safeguarding and child protection (including online safety) updates (for example, via email, e-bulletins and staff meetings), as required, and at least annually, to provide them with relevant skills and knowledge to safeguard children effectively.

15. **All** staff should be aware of their local early help<sup>7</sup> process and understand their role in it.

16. **All** staff should be aware of the process for making referrals to children's social care and for statutory assessments under the Children Act 1989, especially section 17 (children in need) and section 47 (a child suffering, or likely to suffer, significant harm) that may follow a referral, along with the role they might be expected to play in such assessments.<sup>8</sup>

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

18. All staff should be able to reassure victims that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

## What school and college staff should look out for

### *Early help*

19. **Any** child may benefit from early help, but all school and college staff should be particularly alert to the potential need for early help for a child who:

- is disabled or has certain health conditions and has specific additional needs;

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<sup>7</sup> Detailed information on early help can be found in Chapter 1 of [Working Together to Safeguard Children](#)

<sup>8</sup> More detailed information on statutory assessments can be found in Chapter 1 of [Working Together to Safeguard Children](#).

- has special educational needs (whether or not they have a statutory Education, Health and Care Plan);
- has a mental health need;
- 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 or county lines;
- is frequently missing/goes missing from care or from home;
- is at risk of modern slavery, trafficking, sexual or criminal exploitation;
- is at risk of being radicalised or exploited;
- has a family member in prison, or is affected by parental offending;
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse;
- is misusing drugs or alcohol themselves;
- has returned home to their family from care;
- is at risk of 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage;
- is a privately fostered child; and
- is persistently absent from education, including persistent absences for part of the school day.

#### *Abuse and neglect*

20. **All** staff should be aware of indicators of abuse and neglect. Knowing what to look for is vital for the early identification of abuse and neglect (see paragraphs 26-30), and specific safeguarding issues such as child criminal exploitation and child sexual exploitation (see paragraphs 32-39) so that staff are able to identify cases of children who may be in need of help or protection.

21. If staff are unsure, they should **always** speak to the designated safeguarding lead, or deputy.

22. **All** school and college staff should be aware that abuse, neglect and safeguarding issues are rarely standalone events and cannot be covered by one definition or one label alone. In most cases, multiple issues will overlap with one another, therefore staff should always be vigilant and always raise any concerns with their designated safeguarding lead (or deputy).

23. **All** staff should be aware that safeguarding incidents and/or behaviours can be associated with factors outside the school or college and/or can occur between children outside of these environments. **All** staff, but especially the designated safeguarding lead (and deputies) should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, sexual abuse, serious youth violence and county lines.

24. **All** staff should be aware that technology is a significant component in many safeguarding and wellbeing issues. Children are at risk of abuse online as well as face to face. In many cases abuse will take place concurrently via online channels and in daily life. Children can also abuse their peers online, this can take the form of abusive, harassing, and misogynistic messages, the non-consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography, to those who do not want to receive such content.

25. *In all cases, if staff are unsure, they should always speak to the designated safeguarding lead (or deputy).*

#### *Indicators of abuse and neglect*

26. **Abuse:** a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children.

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

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

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

29. **Sexual abuse:** involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue (also known as peer on peer abuse) in education and **all** staff should be aware of it and of their school or colleges policy and procedures for dealing with it, (see paragraph 49).

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

### **Safeguarding issues**

31. **All** staff should have an awareness of safeguarding issues that can put children at risk of harm. Behaviours linked to issues such as drug taking and or alcohol misuse, deliberately missing education and consensual and non-consensual sharing of nudes and semi-nudes images and/or videos<sup>9</sup> can be signs that children are at risk. Other safeguarding issues all staff should be aware of include:

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<sup>9</sup> Consensual image sharing, especially between older children of the same age, may require a different response. It might not be abusive – but children still need to know it is illegal- whilst non-consensual is illegal and abusive. [UKCIS](#) provides detailed advice about sharing of nudes and semi-nude images and videos.

### *Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)*

32. Both CSE and CCE are forms of abuse that occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in sexual or criminal activity, in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. CSE and CCE can affect children, both male and female and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation.

### *Child Criminal Exploitation (CCE)*

33. Some specific forms of CCE can include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting or pickpocketing. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others.

34. Children can become trapped by this type of exploitation as perpetrators can threaten victims (and their families) with violence, or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others. As children involved in criminal exploitation often commit crimes themselves, their vulnerability as victims is not always recognised by adults and professionals, (particularly older children), and they are not treated as victims despite the harm they have experienced. They may still have been criminally exploited even if the activity appears to be something they have agreed or consented to.

35. It is important to note that the experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however professionals should be aware that girls are at risk of criminal exploitation too. It is also important to note that both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

Further information about CCE including definitions and indicators is included in Annex B.

### *Child Sexual Exploitation (CSE)*

36. CSE is a form of child sexual abuse. Sexual abuse may involve physical contact, including assault by penetration (for example, rape or oral sex) or nonpenetrative acts such as masturbation, kissing, rubbing, and touching outside clothing. It may include non-contact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse including via the internet.

37. CSE can occur over time or be a one-off occurrence, and may happen without the child's immediate knowledge e.g. through others sharing videos or images of them on social media.

38. CSE can affect any child, who has been coerced into engaging in sexual activities. This includes 16 and 17 year olds who can legally consent to have sex. Some children may not realise they are being exploited e.g. they believe they are in a genuine romantic relationship.

39. Further information about CSE including definitions and indicators is included in Annex B.

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

40. Whilst **all** staff should speak to the designated safeguarding lead (or deputy) with regard to any concerns about female genital mutilation (FGM), there is a specific **legal duty on teachers**.<sup>10</sup> If a teacher, in the course of their work in the profession, discovers that an act of FGM appears to have been carried out on a girl under the age of 18, the teacher **must** report this to the police. See Annex B for further details.

#### *Mental Health*

41. **All** staff should 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.

42. Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Education 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.

43. 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.

44. Schools and colleges can access a range of advice to help them identify children in need of extra mental health support, this includes working with external agencies. More information can be found in the [mental health and behaviour in schools guidance](#), colleges may also wish to follow this guidance as best practice. Public Health England has produced a range of resources to support secondary school teachers to promote

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<sup>10</sup> Under section 5B(11) (a) of the Female Genital Mutilation Act 2003, "teacher" means, in relation to England, a person within section 141A(1) of the Education Act 2002 (persons employed or engaged to carry out teaching work at schools and other institutions in England).

positive health, wellbeing and resilience among children. See [Rise Above](#) for links to all materials and lesson plans.

45. 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.

*Peer on peer abuse (child on child)*

46. **All** staff should be aware that children can abuse other children (often referred to as peer on peer abuse). And that it can happen both inside and outside of school or college and online. It is important that all staff recognise the indicators and signs of peer on peer abuse and know how to identify it and respond to reports.

47. All staff should understand, that even if there are no reports in their schools or colleges it does not mean it is not happening, it may be the case that it is just not being reported. As such it is important if staff have **any** concerns regarding peer on peer abuse they should speak to their designated safeguarding lead (or deputy).

48. It is essential that **all** staff understand the importance of challenging inappropriate behaviours between peers, many of which are listed below, that are actually abusive in nature. Downplaying certain behaviours, for example dismissing sexual harassment as “just banter”, “just having a laugh”, “part of growing up” or “boys being boys” can lead to a culture of unacceptable behaviours, an unsafe environment for children and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it.

49. Peer on peer abuse is most likely to include, but may not be limited to:

- bullying (including cyberbullying, prejudice-based and discriminatory bullying);
- abuse in intimate personal relationships between peers;
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse);
- sexual violence,<sup>11</sup> such as rape, assault by penetration and sexual assault; (this may include an online element which facilitates, threatens and/or encourages sexual violence);

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<sup>11</sup> For further information about sexual violence see Annex B.



- sexual harassment,<sup>12</sup> such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse;
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party;
- consensual and non-consensual sharing of nudes and semi nudes images and or videos<sup>13</sup> (also known as sexting or youth produced sexual imagery);
- upskirting,<sup>14</sup> which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm; and
- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

50. **All** staff should be clear as to the school's or college's policy and procedures with regards to peer on peer abuse and the important role they have to play in preventing it and responding where they believe a child may be at risk from it.

#### *Serious violence*

51. **All** staff should be aware of the indicators, which may signal children are at risk from, or are involved with serious violent crime. These may include increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation (see paragraphs 33-35).

52. **All** staff should be aware of the range of risk factors which increase the likelihood of involvement in serious violence, such as being male, having been frequently absent or permanently excluded from school, having experienced child maltreatment and having been involved in offending, such as theft or robbery. Advice for schools and colleges is

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<sup>12</sup> For further information about sexual harassment see Annex B.

<sup>13</sup> UKCIS guidance: [Sharing nudes and semi-nudes advice for education settings](#)

<sup>14</sup> For further information about 'upskirting' see Annex B.

provided in the Home Office's [Preventing youth violence and gang involvement](#) and its [Criminal exploitation of children and vulnerable adults: county lines](#) guidance.<sup>15</sup>

#### *Additional information and support*

53. Departmental advice [What to Do if You Are Worried a Child is Being Abused - Advice for Practitioners](#) provides more information on understanding and identifying abuse and neglect. Examples of potential indicators of abuse and neglect are highlighted throughout the advice and will be particularly helpful for school and college staff. The [NSPCC](#) website also provides useful additional information on abuse and neglect and what to look out for.

54. **Annex B** contains important additional information about specific forms of abuse and safeguarding issues. School and college leaders and those staff who work directly with children should read the annex.

#### **What school and college staff should do if they have concerns about a child**

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

56. If staff have **any concerns** about a child's welfare, they should act on them **immediately**. See page 22 for a flow chart setting out the process for staff when they have concerns about a child.

57. If staff have a concern, they should follow their own organisation's child protection policy and speak to the designated safeguarding lead (or deputy).

58. Options will then include:

- managing any support for the child internally via the school's or college's own pastoral support processes;
- undertaking an early help assessment;<sup>16</sup> or

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<sup>15</sup> For further information about county lines see Annex B

<sup>16</sup> Further information on early help assessments, provision of early help services and accessing services is in Chapter 1 of [Working Together to Safeguard Children](#).

- making a referral to statutory services,<sup>17</sup> for example as the child might be in need, is in need or suffering, or is likely to suffer harm.

59. The designated safeguarding lead or a deputy should always be available to discuss safeguarding concerns. If in exceptional circumstances, the designated safeguarding lead (or deputy) is not available, this should not delay appropriate action being taken. Staff should consider speaking to a member of the senior leadership team and/or take advice from local children's social care. In these circumstances, any action taken should be shared with the designated safeguarding lead (or deputy) as soon as is practically possible.

60. Staff should not assume a colleague, or another professional will take action and share information that might be critical in keeping children safe. They should be mindful that early information sharing is vital for the effective identification, assessment, and allocation of appropriate service provision, whether this is when problems first emerge, or where a child is already known to local authority children's social care (such as a child in need or a child with a protection plan). [Information Sharing: Advice for Practitioners Providing Safeguarding Services to Children, Young People, Parents and Carers](#) supports staff who have to make decisions about sharing information. This advice includes the seven golden rules for sharing information and considerations with regard to the Data Protection Act 2018 (DPA) and UK General Data Protection Regulation (UK GDPR). DPA and UK GDPR do not prevent the sharing of information for the purposes of keeping children safe and promoting their welfare. If in any doubt about sharing information, staff should speak to the designated safeguarding lead or a deputy. Fears about sharing information **must not** be allowed to stand in the way of the need to safeguard and promote the welfare of children.

## Early help

61. If early help is appropriate, the designated safeguarding lead (or deputy) will generally lead on liaising with other agencies and setting up an inter-agency assessment as appropriate. Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead practitioner. Any such cases should be kept under constant review and consideration given to a referral to children's

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<sup>17</sup> Chapter 1 of [Working Together to Safeguard Children](#) sets out that the safeguarding partners should publish a threshold document that should include the criteria, including the level of need, for when a case should be referred to local authority children's social care for assessment and for statutory services under section 17 and 47. Local authorities, with their partners, should develop and publish local protocols for assessment. A local protocol should set out clear arrangements for how cases will be managed once a child is referred into local authority children's social care.

social care for assessment for statutory services if the child's situation does not appear to be improving or is getting worse.

### Statutory children's social care assessments and services

62. Concerns about a child's welfare should be referred to local authority children's social care. **Where a child is suffering, or is likely to suffer from harm, it is important that a referral to children's social care (and if appropriate the police) is made immediately.** Referrals should follow the local referral process.

63. Children's social care assessments should consider where children are being harmed in contexts outside the home, so it is important that schools and colleges provide as much information as possible as part of the referral process. This will allow any assessment to consider all the available evidence and enable a contextual approach to address such harm. Additional information is available here: [Contextual Safeguarding](#).

64. The online tool [Report Child Abuse to Your Local Council](#) directs to the relevant local children's social care contact number.

#### *Children in need*

65. A child in need is defined under the Children Act 1989 as a child who is unlikely to achieve or maintain a reasonable level of health or development, or whose health and development is likely to be significantly or further impaired, without the provision of services; or a child who is disabled. Local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare. Children in need may be assessed under section 17 of the Children Act 1989.

#### *Children suffering or likely to suffer significant harm:*

66. Local authorities, with the help of other organisations as appropriate, have a duty to make enquiries under section 47 of the Children Act 1989 if they have reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm. Such enquiries enable them to decide whether they should take any action to safeguard and promote the child's welfare and must be initiated where there are concerns about maltreatment. This includes all forms of abuse and neglect, female genital mutilation, or other so-called 'honour'-based abuse, forced marriage and extra-familial harms like radicalisation and sexual exploitation.

#### *What will the local authority do?*

67. Within one working day of a referral being made, a local authority social worker should acknowledge its receipt to the referrer and make a decision about the next steps and the type of response that is required. This will include determining whether:



- the child requires immediate protection and urgent action is required;
- any services are required by the child and family and what type of services;
- the child is in need and should be assessed under section 17 of the Children Act 1989. Chapter one of [Working Together to Safeguard Children](#) provides details of the assessment process;
- there is reasonable cause to suspect the child is suffering or likely to suffer significant harm, and whether enquiries must be made, and the child assessed under section 47 of the Children Act 1989. Chapter one of [Working Together to Safeguard Children](#) provides details of the assessment process; and
- further specialist assessments are required to help the local authority to decide what further action to take.

68. The referrer should follow up if this information is not forthcoming.

69. If social workers decide to carry out a statutory assessment, staff should do everything they can to support that assessment (supported by the designated safeguarding lead (or deputy) as required).

70. If, after a referral, the child's situation does not appear to be improving, the referrer should consider following local escalation procedures to ensure their concerns have been addressed and, most importantly, that the child's situation improves.

## Record keeping

71. **All** concerns, discussions and decisions made, and the reasons for those decisions, should be recorded in writing. Information should be kept confidential and stored securely. It is good practice to keep concerns and referrals in a separate child protection file for each child.

Records should include:

- a clear and comprehensive summary of the concern;
- details of how the concern was followed up and resolved;
- a note of any action taken, decisions reached and the outcome.

72. If in doubt about recording requirements, staff should discuss with the designated safeguarding lead (or deputy).

## Why is all of this important?

73. It is important for children to receive the right help at the right time to address safeguarding risks, prevent issues escalating and to promote children's welfare. Research and serious case reviews have repeatedly shown the dangers of failing to take effective action.<sup>18</sup> Further information about serious case reviews can be found in Chapter four of [Working Together to Safeguard Children](#). Examples of poor practice include:

- failing to act on and refer the early signs of abuse and neglect;
- poor record keeping;
- failing to listen to the views of the child;
- failing to re-assess concerns when situations do not improve;
- not sharing information with the right people within and between agencies;
- sharing information too slowly; and
- a lack of challenge to those who appear not to be taking action.

## What school and college staff should do if they have safeguarding concerns about another staff member

74. Schools and colleges should have processes and procedures in place to manage any safeguarding concerns about staff members (including supply staff, volunteers, and contractors). If staff have safeguarding concerns or an allegation is made about another member of staff (including supply staff, volunteers, and contractors) posing a risk of harm to children, then:

- this should be referred to the headteacher or principal;
- where there are concerns/allegations about the headteacher or principal, this should be referred to the chair of governors, chair of the management committee or proprietor of an independent school; and
- in the event of concerns/allegations about the headteacher, where the headteacher is also the sole proprietor of an independent school, or a situation where there is a conflict of interest in reporting the matter to the headteacher, this should be reported directly to the local authority

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<sup>18</sup>An analysis of serious case reviews can be found at [gov.uk/government/publications/analysis-of-serious-case-reviews-2014-to-2017](http://gov.uk/government/publications/analysis-of-serious-case-reviews-2014-to-2017).

designated officer(s) (LADOs). Details of your local LADO should be easily accessible on your local authority's website.

Further details can be found in Part four of this guidance.

### **What school or college staff should do if they have concerns about safeguarding practices within the school or college**

75. All staff and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in the school's or college's safeguarding regime and know that such concerns will be taken seriously by the senior leadership team.

76. Appropriate whistleblowing procedures should be put in place for such concerns to be raised with the school's or college's senior leadership team.

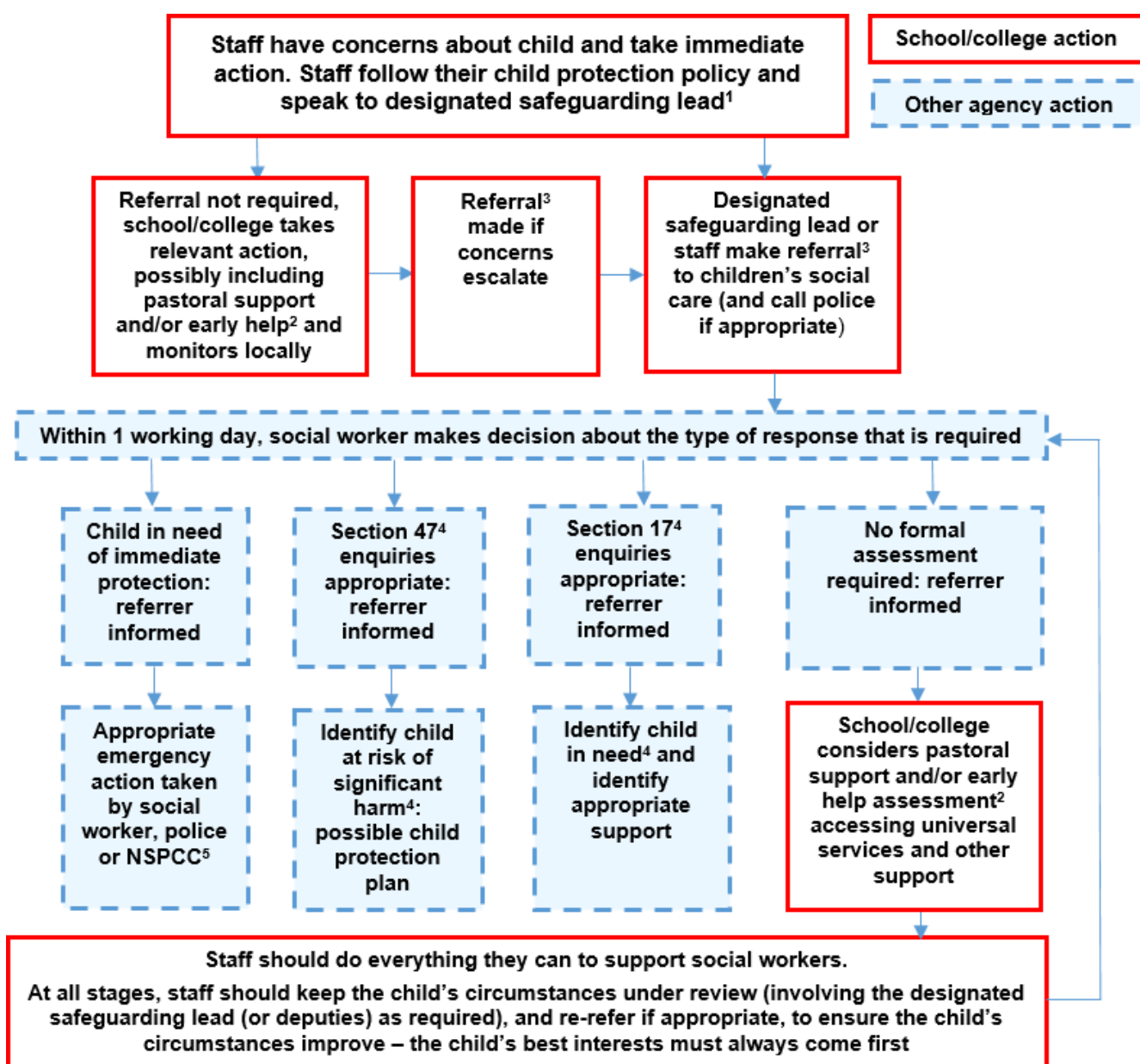
77. Where a staff member feels unable to raise an issue with their employer, or feels that their genuine concerns are not being addressed, other whistleblowing channels are open to them:

- general guidance on whistleblowing can be found via: [Advice on Whistleblowing](#)
- the [NSPCC's what you can do to report abuse dedicated helpline](#) is available as an alternative route for staff who do not feel able to raise concerns regarding child protection failures internally, or have concerns about the way a concern is being handled by their school or college. Staff can call 0800 028 0285 – line is available from 8:00 AM to 8:00 PM, Monday to Friday and email: [help@nspcc.org.uk](mailto:help@nspcc.org.uk).<sup>19</sup>

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<sup>19</sup> Alternatively, staff can write to: National Society for the Prevention of Cruelty to Children (NSPCC), Weston House, 42 Curtain, Road, London EC2A 3NH.

## Actions where there are concerns about a child



<sup>1</sup> In cases which also involve a concern or an allegation of abuse against a staff member, see Part Four of this guidance.

<sup>2</sup> Early help means providing support as soon as a problem emerges at any point in a child's life. Where a child would benefit from co-ordinated early help, an early help inter-agency assessment should be arranged. Chapter one of [Working Together to Safeguard Children](#) provides detailed guidance on the early help process.

<sup>3</sup> Referrals should follow the process set out in the local threshold document and local protocol for assessment. Chapter one of [Working Together to Safeguard Children](#).

<sup>4</sup> Under the Children Act 1989, local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare. Children in need may be assessed under section 17 of the Children Act 1989. Under section 47 of the Children Act 1989, where a local authority has reasonable cause to suspect that a child is suffering or likely to suffer significant harm, it has a duty to make enquiries to decide whether to take action to safeguard or promote the child's welfare. Full details are in Chapter one of [Working Together to Safeguard Children](#).

<sup>5</sup> This could include applying for an Emergency Protection Order (EPO).



The Government's national counter terrorism strategy CONTEST has four elements:

### **Pursue, Protect, Prepare and Prevent**

**Prevent** aims to stop people becoming terrorists or supporting terrorism.

Education, like other key sectors, has a responsibility to promote values of openness, tolerance and facilitating free debate which is central to being a British citizen. With the current government alert at severe [2015] the college needs to be aware of risks and raise awareness within its community.

New statutory guidance "Keeping Children Safe in Education" was introduced in April 2014 and most recently updated in July 2020. From this guidance the college introduced a new "keeping yourself safe guidance" which identified the behaviours it expects of staff. Further developments have also take place around safer recruitment practice to ensure that all safeguarding procedures are in place.

Further education is are major education and training provider for the 16 – 25 year age group, particularly young people from ethnically diverse and socially and economically disadvantaged areas. The age and profile of our learners make it crucial to be involved in the Prevent strategy. Colleges have a part to play in fostering shared values and promoting cohesion. Colleges should focus on the risks of violent extremism, which represents the greatest threat at national level, while recognising that other forms of violence and extremism can and do manifest themselves within colleges and other training settings.

### **Teaching and Learning**

To provide a curriculum which promotes knowledge, skills and understanding to build the resilience of learners, by undermining extremist ideology and supporting the learner voice. This will be achieved through:

- Embedding equality, diversity and inclusion, wellbeing and community cohesion
- Promoting wider skill development such as social and emotional aspects of learning
- A curriculum adapted to recognise local needs, challenge extremist narratives and promote universal rights
- Teaching and learning strategies which explore controversial issues in a way which promotes critical analysis and pro-social values
- Use of external programmes or speakers to support learning while ensuring that the input supports college goals and values
- Encouraging active citizenship and learner voice

### **Learner Support**

To ensure that all staff are confident to take preventative and responsive steps working with partner professionals, families and communities. This will be achieved through:

- Establishing strong and effective learner support services
- Developing strong community links and being aware of what is happening in the locality
- Implementing anti-bullying strategies and challenging discriminatory behaviour
- Recognising factors which may increase risk to a learner i.e. vulnerability, disadvantage or hardship and implementing early risk management strategies
- Sign posting learners and staff to access support in college and/or via community partners
- Supporting at risk learners through safeguarding and crime prevention processes

- Focussing on narrowing the attainment gap for all learners
- Working collaboratively to promote support for learners across all areas of the college to include the college Nursery and learners in off-site provision

### **Managing Risks and Responding to Events**

- To ensure that the college monitors risks and is ready to deal appropriately with issues which arise. It will do this through:
- Understanding the nature of the threat from violent extremism and how this may impact directly or indirectly on the college
- Identifying potential risks within the college and from external influences
- Ensuring measures are in place to minimise the potential for acts of violent extremist within the college
- Ensuring that plans are in place to respond appropriately to a threat or incident within the college
- Responding appropriately to events reported via local, national or international news that may impact on learners and communities
- Developing effective ICT security and responsible user policies

### **British Values**

British values should be embedded across the curriculum. The values include

- Democracy
- Rule of law
- Individual liberty
- Mutual respect
- Tolerance of different faiths

These can support the college's promotion of Ready, Respectful and Safe.

## What to do if you have concerns?

### BCoT Guide

BCoT embraces the need to take action to safeguard and promote the welfare of young people and vulnerable adults receiving education and training.

Safeguarding children, young people and vulnerable adults is preventative. It covers issues such as:

Health & Safety  
Bullying  
E-Safety

Child protection/protection of vulnerable adults is recognising and acting upon possible abuse

### It is everyone's responsibility to:

Recognise  
Respond  
Report  
Record  
Refer

### What kinds of abuse are there? (At risk of significant harm)

- Physical
- Emotional
- Sexual
- Neglect

### Other causes for concern

- Bullying
- Substance Abuse
- Financial
- Domestic Violence
- Forced Marriage
- Extremism
- Radicalisation

### What should cause concern?

- Unexplained injuries
- Pattern of injury
- Unrealistic parental expectations
- Continual self-deprecation – low self esteem
- Self-harm
- Neurotic behaviour
- Extremes of passivity or aggression
- Poor social development/isolation
- Lack of trust or fear of familiar adults
- Hunger, lateness, non-attendance
- Homelessness

## **How to talk to a student who is disclosing abuse**

- Listen carefully and stay calm
- Do not interview – question without pressure to ensure you have understood
- Do not put words into the student's mouth
- Reassure by saying the student has done the right thing
- Inform the student that you must pass the information on but only to those who need to know
- Note the points carefully
- Make a detailed note of date, time, place and what was said

## **What you should not do**

- Promise confidentiality
- Investigate the matter yourself
- Convey any sense of judgement or shock
- Discuss the situation with anyone else except the Designated Person

## **Action you should take if you suspect abuse**

- Report to Designated Person
- Avoid excessive questioning of young person/vulnerable adult
- Make note of events
- Designated Person contacts Children/Adult Services
- Complete a written report for Designated Person
- Designated Person sends referral to Children/Adult Services
- Designated Person to support both staff and student

## **If the decision is that the concern is not serious then you should**

- Discuss options with young person/vulnerable adult and seek advice of Designated Person/Line Manager
- Agree course of action with young person/vulnerable adult
- Monitor discuss and support

## **How you should protect yourself from risk**

- Do not hold private meetings with students
- Conduct one to one meetings with visual access
- Avoid any meetings with students away from college
- Avoid all unnecessary physical contact with students
- When demonstrating use of equipment to students respect limits of reasonable contact
- If administering first aid ensure other students or another adult is present even when life is not threatened
- Do not enter into a sexual relationship with a student who is under 18, or a vulnerable adult, whether you teach them or not – this would be illegal under The Sexual Offences Act
- Do not use inappropriate language or gesture
- Inform your Head of Department if a student claims to be attracted to you
- Do not use disparaging or sarcastic comments
- Be particularly careful when involved in extracurricular or residential activities
- Do not give or receive inappropriate gifts to/from students
- Do not give personal communication information to students (addresses, telephone number, email, Facebook)

# WHO TO CONTACT

## BCoT Designated Officers

### EMT Safeguarding Lead

Alexis Smith

Assistant Principal Foundation Learning and Student Voice

Tel: 01256 306471

Email: [alexis.smith@bcot.ac.uk](mailto:alexis.smith@bcot.ac.uk)

### Designated Persons:

Alexis Smith

Assistant Principal Foundation Learning and Student Voice

Tel: 01256 306471

Email: [alexis.smith@bcot.ac.uk](mailto:alexis.smith@bcot.ac.uk)

Helen Key

Transition Manager

Email: [helen.key@bcot.ac.uk](mailto:helen.key@bcot.ac.uk)

Rachel Auge

Apprenticeship training consultant

Email: [Rachel.Auge@bcot.ac.uk](mailto:Rachel.Auge@bcot.ac.uk)

Lynsey Spillane

Course Director Foundation Learning

Email: [Lynsey.spillane@bcot.ac.uk](mailto:Lynsey.spillane@bcot.ac.uk)

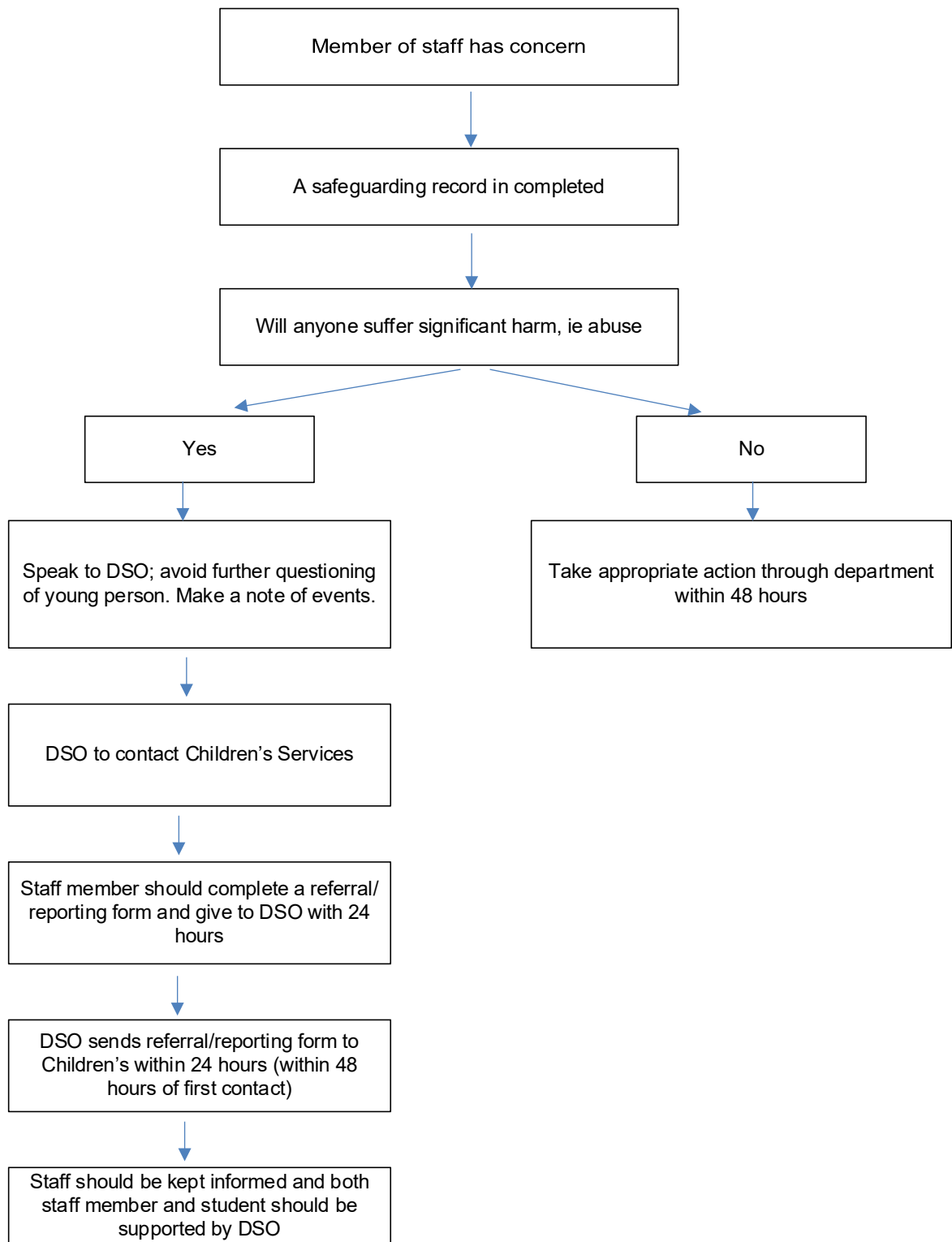
Anna Thorpe

Careers and Employability Team Leader

Email: [anna.thorpe@bcot.ac.uk](mailto:anna.thorpe@bcot.ac.uk)

**Appendix 5B**

**Actions to take if you think a young person is being abused**



**CONFIDENTIAL**

**SAFEGUARDING REFERRAL/REPORTING FORM: Section B**

**To be completed with the Designated Person**

- One copy to be sent to Children's Services/Police (if appropriate)
- One copy to be retained by the Designated Safeguarding Officer

Designated Person: \_\_\_\_\_

Contact Telephone Number: Work: \_\_\_\_\_

Home: \_\_\_\_\_

Name of Staff Member: \_\_\_\_\_

(Making the Referral/Reporting the Incident)

Contact Telephone Number: \_\_\_\_\_

Name of Complainant: \_\_\_\_\_

If different, name of child allegedly being abused: \_\_\_\_\_

Date and Time of Allegation: \_\_\_\_\_ Place of Allegation: \_\_\_\_\_

Details of the alleged allegation/concern: \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Description of any injuries observed. If possible attach a diagram. \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Name(s) of any others present at time of the allegation: \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_

What action was taken by staff member in relation to the young person?

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Names of any others present at the interview: \_\_\_\_\_

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Action taken by Designated Safeguarding Officer: \_\_\_\_\_

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Names of people contacted and times: \_\_\_\_\_

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Was a referral made? \_\_\_\_\_

Action agreed with Children's Services:

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Further action to be taken:

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Signature of staff member making referral/reporting incident: \_\_\_\_\_

Signature of Designated Safeguarding Officer: \_\_\_\_\_

Date: \_\_\_\_\_ Time: \_\_\_\_\_



## Sexual violence and sexual harassment between children in colleges

### Peer on Peer Abuse

#### Context

Sexual violence and sexual harassment can occur between two children of any age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.

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

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

We believe that all children have a right to attend school and learn in a safe environment. Children should be free from harm by adults in the school and other children.

We recognise that children are capable of abusing their peers and this will be dealt with under our child protection policy and in line with KCSiE (2020) and we follow the "Sexual violence and sexual harassment between children in schools and colleges" advice provided by the DfE [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/719902/Sexual\\_violence\\_and\\_sexual\\_harassment\\_between\\_children\\_in\\_schools\\_and\\_colleges.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/719902/Sexual_violence_and_sexual_harassment_between_children_in_schools_and_colleges.pdf)

We are clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up.

We will minimise the risk of peer on peer abuse by:-

#### Prevention:

- Taking a whole college approach to safeguarding & child protection
- Providing training to staff
- Providing a clear set of values and standards, underpinned by the college's behaviour policy and pastoral support system, and by a planned programme of evidence based content delivered through the curriculum.
- Engaging with specialist support and interventions.

#### Responding to reports of sexual violence and sexual harassment:

- Children making a report of sexual violence or sexual harassment will be taken seriously, kept safe and be well supported.
- If the report includes an online element staff will be mindful of the Searching, Screening and Confiscation: advice for schools (DfE 2018) guidance.

- Staff taking the report will inform the DSL or their Deputy as soon as practicably possible but at least within 24 hours.
- Staff taking a report will never promise confidentiality.
- Parents or carers will normally be informed (unless this would put the child at greater risk).
- If a child is at risk of harm, is in immediate danger, or has been harmed, a referral will be made to Children's Social Care (01329 225379).

**Risk Assessment:-**

Following a report the DSL will make an immediate risk and needs assessment on a case-by-case basis.

The Risk assessment will consider;

- The victim, especially their protection and support.
- The alleged perpetrator, their support needs and any discipline action.
- All other children at the college
- The victim and the alleged perpetrator sharing classes and space at school.

The risk assessment will be recorded and kept under review. Where there has been other professional intervention and/or other specialist risk assessments, these professional assessments will be used to inform the school's approach to supporting and protecting pupils.

**Action: The DSL will consider:-**

- The wishes of the victim.
- The nature of the incident including whether a crime has been committed and the harm caused.
- Ages of the children involved.
- Developmental stages of the children.
- Any power imbalance between the children.
- Any previous incidents.
- Ongoing risks.
- Other related issues or wider context.

**Options: The DSL will manage the report with the following options:-**

- Manage internally
- Early Help
- Refer to Children's Social Care
- Report to the police (generally in parallel with a referral to Social Services)

**Ongoing Response:**

- The DSL will manage each report on a case by case basis and will keep the risk assessment under review.
- Where there is a criminal investigation into a rape, assault by penetration or sexual assault, the alleged perpetrator should be removed from any classes they share with the victim.
- The DSL will consider how best to keep the victim and perpetrator a reasonable distance apart on school premises and on transport where appropriate.
- Where a criminal investigation into a rape or assault by penetration leads to a conviction or caution, the school will take suitable action. In all but the most exceptional of circumstances, the rape or assault is likely to constitute a serious breach of discipline and lead to the view that allowing the perpetrator to remain in the same school or college would seriously harm the education or welfare of the victim (and potentially other pupils or students).

- Where a criminal investigation into sexual assault leads to a conviction or caution, the school or college will, if it has not already, consider any suitable sanctions in light of their behaviour policy, including consideration of permanent exclusion. Where the perpetrator is going to remain at the college, the principle would be to continue keeping the victim and perpetrator in separate classes and continue to consider the most appropriate way to manage potential contact on college premises and transport. The nature of the conviction or caution and wishes of the victim will be especially important in determining how to proceed in such cases.
- The victim, alleged perpetrator and other witnesses (children and adults) will receive appropriate support and safeguards on a case-by-case basis.
- The college will take any disciplinary action against the alleged perpetrator in line with behaviour and discipline in college
- The college recognises that taking disciplinary action and providing appropriate support are not mutually exclusive actions and will occur at the same time if necessary.

### **Physical Abuse**

While a clear focus of peer on peer abuse is around sexual abuse and harassment, physical assaults and initiation violence and rituals from pupils to pupils can also be abusive.

These are equally not tolerated and if it is believed that a crime has been committed, will be reported to the police.

The principles from the behaviour policy will be applied in these cases, with recognition that any police investigation will need to take priority.

References: –

KCSiE (DfE 2020)

Sexual Violence and Sexual Harassment between Children in Schools and Colleges (DfE 2018)

**ROLES OF DESIGNATED STAFF RESPONSIBLE FOR SAFEGUARDING****Roles of Designated Staff Responsible for Child Protection**

- a) The senior member of staff responsible for recruitment and training needs of staff is the Head of Human Resources.
- b) This member of staff is responsible for ensuring that all DBS checks are undertaken and for ensuring that all staff receive basic training in child protection issues and are aware of the college child protection procedures
- c) The senior member of staff with operational responsibility for child protection is Alexis Smith, Assistant Principal
- d) This member of staff has a key duty to take lead responsibility for raising awareness with the staff of issues relating to the safeguarding of children, young people and vulnerable adults and the promotion of a safe environment for these learners within the college.
- e) **The EMT Safeguarding Lead is to:**
  - Fully co-operate and work with the HSCB (Safeguarding Partner)
  - Be aware of the methods and requirements of inter-agency working
  - Keep up-to-date with developments in child protection issues
  - Oversee the referral of cases of suspected abuse or allegations to the Children's Services
  - Provide advice and support to all other staff on issues relating to child protection
  - Maintain a proper and auditable record of any child protection or safeguarding referral, complaint or concern including cases where that concern does NOT lead to a referral
  - Ensure that all data and information relating to Child Protection matters are stored securely in locked accommodation
  - Ensure that all parents and guardians of children and young people within the college are aware of the college Safeguarding Policy
  - Liaise with the local education authority and the LSCB (Safeguarding Partner) and any other appropriate agencies
  - Liaise with secondary schools which send pupils to the college to ensure that appropriate protection arrangements are made for those pupils enrolling at college
  - Ensure that all other persons in partnership with the college, including volunteers, subcontractors and service level agreement holders are aware of this policy and understand their obligation to protect and safeguard children, young people and vulnerable adults
  - Produce an annual report to the Board of Corporation setting out how the college has discharged its duties. The report must include any deficiencies in procedure or policy identified by the HSCB (Safeguarding Partner)
  - Report any deficiencies identified by the HSCB or any other relevant agency to the Board of Corporation at the earliest opportunity
  - Have direct access to the Principal on a no notice basis

### **Specially Designated Staff Members (DSOs)**

The designated staff members with responsibility for safeguarding issues are Alexis Smith, Assistant Principal, Anna Thorpe Careers and Employability Team Leader, Helen Key Transition Manager, Rachel Auge Apprenticeship team and Lynsey Spillane, Course Director for Foundation Learning

These designated staff members are to:

- Report to the EMT Safeguarding Lead
- Know how to make an appropriate referral
- Be available to provide advice and support to other staff on issues related to child protection
- Have particular responsibility to be available to listen to children and young people studying at the college or at a work placement
- Deal with individual cases, including attending any case conferences and review meetings as appropriate
- Receive child protection training and inter-agency working training as required by the HSCB
- Undergo refresher training in child protection at least every two years

#### f) **Duties of the Designated Governor**

The designated member of the Board of Corporation with responsibility for safeguarding is Steve Fussey

The designated member is responsible for liaising with the Principal and senior staff member with lead responsibility over matters regarding safeguarding and child protection, including:

- Ensuring that the college has procedures and policies which are consistent with the Hampshire Safeguarding Children Board (HSCB- Safeguarding Partner) procedures
- Ensuring that the governing body considers the college policy on safeguarding each year
- Ensuring that each year the governing body is informed of how the college and its staff have complied with the policy including, but not limited to, a report on the training that staff have under taken

The designated member is further responsible for overseeing the liaison between the HSCB, the Police, Children's Services and any other agency defined by the HSCB in connection with allegations against the Principal or senior staff member with lead responsibility. This will NOT involve undertaking any form of investigation but will ensure good communication between the parties and provide information to assist enquiries.

To ensure that the designated member of the Board of Corporation is supported in their duties they shall receive appropriate safeguarding training.

## LIST OF COLLEGE POLICIES RELATING TO SAFEGUARDING

### 1. Policies relating to the safety of the facilities:

H & S 1fr	Car Parking Policy
H & S 1g	Security Policy

### 2. Policies relating to incidents and activities

H & S 1a	Offsite Activities Policy and Procedure
H & S 1b	Reporting and Investigation of Incidents, Accidents, Diseases and Dangerous Occurrences
H & S 1c	Emergency Procedures for Fire and Bomb Evacuation
H & S 1i	Procedure on Staff response to College Incidents and Queries
Stu 2b	Learner Involvement Strategy
Stu 3c	Work Experience Placements for Full Time Students Policy and Procedure
Stu 2j	Student Complaints Policy and Procedure
EDS 1d	Anti-Bullying Policy

### 3. Policies relating to data protection

G & M 1f	Policy on Access to College Information
G & M 1h	Data Protection Statement
H & S 1h	IT Security Policy
Stu 2h	Electronic Communication Acceptable Use Policy and Procedures for Student Use

### 4. Policies relating to development of long term physical, social and financial well-being

H & S 1d	Smoke Free Policy
H & S 1e	Environmental Policies
EDS 1a	Equality and Diversity Policy
Stu 2i	Drugs Policy (Substance Use, Misuse or Abuse)

### 5. Policies relating to employment

HR07f	Bullying and Harassment
HR07i	Whistleblowing Policy and Procedure

### 6. Prevent Strategy and Action Plan

#### Links

Working Together to Safeguard Children, published 9<sup>th</sup> December

<https://www.gov.uk/government/publications/working-together-to-safeguard-children--2>

Keeping children safe in education

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

Sexual violence and sexual harassment between schools and Colleges (July 2021)

<https://www.gov.uk/government/publications/sexual-violence-and-sexual-harassment-between-children-in-schools-and-colleges>

## SAFEGUARDING - RISKS ASSOCIATED WITH RECRUITMENT

As part of our review of Safeguarding in the college, two areas of risk regarding the recruitment and employment of staff, especially sessional/casual staff, have been identified. These are:

- 1.1 The possibility that a new member of staff will not have their identity and right to work in the UK checked. (Note that it is illegal to knowingly employ anyone without the right to work in the UK and we are obliged by law to undertake appropriate checks).
- 1.2 The likelihood that new members of staff will be placed in a position of trust/responsibility for children and/or vulnerable adults before the college has had the opportunity to check their DBS status. This is a particular issue in the case of teaching staff.
- 2 Recently revised recruitment practice for permanent staff requires individuals to produce, at the time of interview, the relevant documentation to check their right to work in UK. Thus, for permanent staff, the risk of 1.1 above occurring should be minimal.
- 3 On being offered a post, permanent staff are sent the DBS forms to complete and are asked to provide the supporting documentation in advance of commencing work (or, as a last resort, on their first day of work). A phone call is made to arrange a date for documentation to be brought in. The length of time that we have to wait for the DBS clearance to come through, after they have commenced work, is thus minimised, although the waiting time is often not eliminated as the DBS clearance can take several weeks to be processed.
- 4 In order to reduce the risks associated with 1.1 and 1.2 above, the following measures must now be implemented by Heads with immediate effect.

### **A Recruitment of sessional/casual staff**

- 5 Inform candidates *before* you offer them a post, ideally when you call them to interview, that an enhanced DBS check, as well as proof of their right to work in the UK, will be required in order for their post to be confirmed.
- 6 Tell successful candidates that they must, at the latest, bring the necessary DBS documents/proof of identity documents with them on their first day of work, and provide them to HR that day. If they can provide them to HR before their first day at work, then that would be preferred. They should allow approximately 30 minutes for HR to record the documents and ensure a DBS disclosure from is completed. Note: people who will be working outside the standard working hours (8.30 am. to 5 pm.) will be expected to visit during these standard hours to complete the documentation.
- 7 On offering a post to a sessional member of staff, send an email to HR that you have made an offer, giving the person's name, the role and the proposed start date.
- 8 The employment cannot be confirmed and no pay claims will be processed until the required documents have been received, and casual/sessional staff should be warned of this at the time you make them the offer.



## **B Staff awaiting DBS clearance.**

- 9 Inevitably, some staff, including many (if not most) new sessional/casual staff will start work before their DBS disclosure has been processed by the DBS, and their clearance received in HR. Line managers/Heads must therefore maintain “heightened supervision” on these staff until HR confirms that a satisfactory DBS report has been received. This “heightened supervision” should reflect what is known about the person, their experience, the nature of their duties and level of responsibility. HR will inform Line Managers/Heads immediately on receipt of a satisfactory DBS check.
- 10 Staff who teach elsewhere and/or are experienced teachers may well have been DBS checked by another establishment. If this is the case the individual will have a copy of that disclosure, and they could be asked to provide HR with copy details (in a sealed envelope marked “confidential”) as an interim measure until the new clearance comes through. This would not obviate the need for our own check to clear through the DBS but it would provide some level of reassurance.
- 11 For each member of staff awaiting DBS clearance, Heads are to keep a brief note of their risk assessment regarding their access to learners and should be prepared to justify the “heightened supervision” measures they have implemented.

**TRAINING STAFF IN SAFEGUARDING****Training Plans to Implement Whole College Approach to Safeguarding**

- 1 All Staff employed by BCoT need to undertake training in safeguarding, such training is available through Safeguard.
- 2 Provision needs to be made for training governors, contractors and volunteers.
- 3 Initial training to be up-dated annually.
- 4 The level of training for personnel will vary:
  - a. Staff involved in recruitment to undertake will take safer recruiting training
  - b. The level of training required by contractors will relate to the amount of time spent by contract staff in college. Our premises are a specified place. Where contract staff are involved in regulated activity frequently, intensively or overnight, the college will provide training in modules 1 & 2 and this will be negotiated as part of the terms of contract. Local managers of contract companies will be expected to undertake this training. Staff whose employment in college is infrequent or occasional or whose hours of work do not coincide with student presence in the building will be provided with a brief introduction to the topic reinforced by a leaflet. The contractor will make any necessary arrangements about staff time.
- 5 Staff to be identified by issuing of a list by HR.
- 6 Staff involved in recruitment to undertake modules 3 and 4 of the LSIS training.
- 7 Contractors to be issued with the Brief BCoT Guide to Safeguarding.
- 8 All staff and contractors (dependent on the amount of time spent in college) to complete the Channel On-line training (Prevent).
- 9 Safeguarding updates will be given through teacher forums, all staff email, team meetings, on training days.

## Guidance for wearing lanyards

### Management guidelines – Lanyards

From September 2019, Basingstoke College of Technology (BCoT) has a new procedure in place for all people coming into college. This will ensure that BCoT remains a safe and secure environment for everybody learning and working here.

To ensure we are keeping everyone safe at college it is important that everyone wear lanyards. The expectation is that lanyards are visible for all staff/students/visitors at all times. The student's badge must be visible, it is not enough for students to have their badge in their pocket with the lanyard hanging down. Students should wear their badge at all times (for health and safety if they do not have a belt clip they may need to remove them when working with machinery in workshops).

Whilst a current student an ID badge allows unlimited access to the college during term-time. Access during holiday periods is possible by arrangement.

Terms and conditions for the issue of Student ID badges:

- You must use one of the speed-gate entrances to come into college, except C and D blocks.
- You will need your ID badge to enter college and move around when in.
- You will also need your ID badge for registration at the start of each lesson.
- If you forget your badge you can obtain a working temporary badge which will be valid for one day. You will need to leave a £2 deposit, or item of value, and return your temporary badge at the end of the day and collect your deposit.
- You are limited to three temporary badges in an academic year. After that you will need to either return with your badge or buy a replacement (cost £5.00).
- You must not attempt to gain access to the college without your ID badge.
- You should never be without your ID badge when you are in college.
- You must not give your ID badge to anyone else to use.
- You must not attempt to help anyone without a valid badge to gain access to the college.
- Any student not complying with these terms and conditions will face an automatic suspension.

#### Guidance for students

Through induction, tutorials and lessons the importance of wearing lanyards at all times will be reiterated, it will be linked with keeping everyone safe.

Students will not be served in the canteen without their badge being visible. When supporting students in any area the student should have their badge visible and challenged if not.

#### Guidance for staff

The expectation is that **all** staff challenge any person not wearing a lanyard and visible badge. Staff should challenge a student if the badge is not visible. If the student does not have one they go to reception to get a temporary badge.

Students will not be allowed into class without a badge, if they have forgotten it they should be sent to reception. Badges should be kept on during lessons as this will support the students wearing them consistently and so they cannot leave their badge in the classroom and it promotes the consistency we are aiming for across the college

If you see students in common areas without their badge being visible ask them to put it on.

## **Consequences**

If a student is rude or uncooperative, take the student's name and log it as a behaviour alert on the eILP. If you feel that by challenging the student it could lead to a confrontation if possible get the students name and inform the RAP or if it is in a common area with CCTV please inform Alexis Smith of the location and time and we can try and identify the student and take appropriate action. If the student has three behaviour alerts there will be a disciplinary meeting.

If there is any member of staff who would like support on how to challenge students please do contact Alexis Smith, AP on extension 6471.

## Behaviours: age 13 to 17

All green, amber and red behaviours require some form of attention and response. It is the level of intervention that will vary.

### What is a green behaviour?

Green behaviours reflect safe and healthy sexual development. They are displayed between children or young people of similar age or developmental ability and reflective of natural curiosity, experimentation, consensual activities and positive choices

### What can you do?

Green behaviours provide opportunities to give positive feedback and additional information.

#### Green behaviours

- solitary masturbation
- sexually explicit conversations with peers
- obscenities and jokes within the current cultural norm
- interest in erotica/pornography
- use of internet/e-media to chat online
- having sexual or non-sexual relationships
- sexual activity including hugging, kissing, holding hands
- consenting oral and/or penetrative sex with others of the same or opposite gender who are of similar age and developmental ability
- choosing not to be sexually active

### What is an amber behaviour?

Amber behaviours have the potential to be outside of safe and healthy behaviour. They may be of potential concern due to age, or developmental differences. A potential concern due to activity type, frequency, duration or context in which they occur.

### What can you do?

Amber behaviours signal the need to take notice and gather information to assess the appropriate action.

#### Amber behaviours

- accessing exploitative or violent pornography
- uncharacteristic and risk-related behaviour, e.g. sudden and/or provocative changes in dress,
- withdrawal from friends, mixing with new or older people, having more or less money than usual, going missing
- concern about body image
- taking and sending naked or sexually provocative images of self or others
- single occurrence of peeping, exposing, mooning or obscene gestures
- giving out contact details online
- joining adult- only social networking sites and giving false personal information
- arranging a face to face meeting with an online contact alone

### What is a red behaviour?

Red behaviours are outside of safe and healthy behaviour. They may be excessive, secretive, compulsive, coercive, degrading or threatening and involving significant age, developmental, or power differences. They may pose a concern due to the activity type, frequency, duration or the context in which they occur

### What can you do?

Red behaviours indicate a need for immediate intervention and action.

#### Red behaviours

- exposing genitals or masturbating in public
- preoccupation with sex, which interferes with daily function
- sexual degradation/humiliation of self or others
- attempting/forcing others to expose genitals
- sexually aggressive/exploitative behaviour
- sexually explicit talk with younger children
- sexual harassment
- non-consensual sexual activity
- use of/acceptance of power and control in sexual relationships
- genital injury to self or others
- sexual contact with others where there
- is a big difference in age or ability
- sexual activity with someone in authority and in a position of trust
- sexual activity with family members
- involvement in sexual exploitation and/or trafficking
- sexual contact with animals
- receipt of gifts or money in exchange

This is intended to be used as a guide only. Please refer to the guidance tool at <https://www.brook.org.uk/our-work/the-sexual-behaviours-traffic-light-tool> for further information

Print date: 01/10/2015 - Brook has taken every care to ensure that the information contained in this publication is accurate and up-to-date at the time of being published. As information and knowledge is constantly changing, readers are strongly advised to use this information for up to one month from print date. Brook accepts no responsibility for difficulties that may arise as a result of an individual acting on the advice and recommendations it contains.

Brook sexual behaviours traffic light tool adapted from Family Planning Queensland. (2012). Traffic Lights guide to sexual behaviours. Brisbane: Family Planning Queensland, Australia.

## Sexual Violence and Sexual Harassment between Children Risk and Needs Assessment Template

Brook Traffic Light Assessment	What are the risks? Who might be harmed & how?	Action	Action by Who?	Action by when?	Action status or Date Completed & Outcome including further actions
Red Behaviour:					

# Annex to Safeguarding Policy

## COVID-19 changes to our Safeguarding Policy

30 March 2020

### Response to COVID-19

There have been significant changes within our setting in response to the outbreak. Many young people are now at home and staffing is likely to be significantly affected through illness and self-isolation.

Despite the changes, the college's safeguarding policy is fundamentally the same: **children and young people always come first, staff should respond robustly to safeguarding concerns and contact the DSL in line with our established safeguarding procedure.**

This annex sets out some of the adjustments we are making in line with the changed arrangements in the college and following [advice from government](#) and local agencies.

### Reporting arrangements

The college arrangements continue in line with our safeguarding policy.

The Designated Safeguarding Lead is: Alexis Smith [alexis.smith@bcot.ac.uk](mailto:alexis.smith@bcot.ac.uk) 07827246145  
DSLs are: Helen Key [helen.key@bcot.ac.uk](mailto:helen.key@bcot.ac.uk) and Lynsey Spillane  
[lynsey.spillane@bcot.ac.uk](mailto:lynsey.spillane@bcot.ac.uk)

The college's approach ensures a DSL is always on site while the college is open. Staff will continue to follow the safeguarding procedure and advise the safeguarding leads immediately about concerns they have about any child. COVID-19 means a need for increased vigilance due to the pressures on services, families and young people, rather than a reduction in our standards.

Children's services may be affected by the impact of the virus on staff and an increased demand for services. Where a child is at risk of significant harm there may be a need to be persistent in referring concerns to the local authority. The arrangements for contacting children's services are to go through one of the DSLs.

Should a child in the college's view be at risk of significant harm and local agencies are not able to respond, the college will immediately follow the safeguarding children partnership escalation procedure.

### Identifying vulnerability

We have undertaken a scoping exercise to identify the most vulnerable children. We have put in place specific arrangements in respect of the following groups:

- Looked After Children
- Previously Looked After Children
- Children subject to a child protection plan
- Children who have, or have previously had, a social worker
- Children with an EHCP

### Staff will be aware of increased risk

The pressures on children and their families at this time are significant. There will be heightened awareness of family pressures through being contained in a small area, poverty, and financial or health anxiety. These areas should be considered in the setting of any work

for children to undertake at home (including recognising the impact of online learning – see below). Staff will be aware of the mental health of both children and their parent and carers, informing the DSL about any concerns.

## Peer-on-peer abuse

We recognise the potential for abuse to go on between young people, especially in the context of a school closure or partial closure. Our staff will remain vigilant to the signs of peer-on-peer abuse, including those between young people who are not currently attending our provision. Extra care should be taken where groups have mixed ages, developmental stages, are attending other schools as an interim measure and similar. When making contact with these families our staff will ask about relationships between learners.

We also address the issue of peer-on-peer abuse in our remote learning curriculum.

## Risk online

Young people will be using the internet more during this period. The college may also use online approaches to deliver training or support. Staff will be aware of the signs and signals of cyberbullying and other risks online and apply the same child-centred safeguarding practices as when children were learning at the college.

- The college continues to ensure appropriate filters are in place where possible
- Smoothwall works on all the devices that we have issued for students to use at home.
- The college has taken on board guidance from the [UK Safer Internet Centre](#) on safe remote learning and guidance for [safer working practice](#) from the Safer Recruitment Consortium. We have reviewed the code of conduct and information sharing policy accordingly. Staff have discussed the risk that professional boundaries could slip during this exceptional period and been reminded of the school's code of conduct and importance of using school systems to communicate with children and their families.
- Staff have read the 20 Safeguarding concerns for livestreaming <https://static.lgfl.net/LgflNet/downloads/digisafe/Safe-Lessons-by-Video-and-Livestream.pdf> prior to delivering any livestreamed sessions
- Children and young people accessing remote learning receive guidance on keeping safe online and know how to raise concerns with the college, [Childline](#), the [UK Safer Internet Centre](#) and [CEOP](#).
- Parents have been offered the following links (through the website):
  - [Internet matters](#) - for support for parents and carers to keep their children safe online
  - [London Grid for Learning](#) - for support for parents and carers to keep their children safe online
  - [Net-aware](#) - for support for parents and carers from the NSPCC
  - [Parent info](#) - for support for parents and carers to keep their children safe online
  - [Thinkuknow](#) - for advice from the National Crime Agency to stay safe online
  - [UK Safer Internet Centre](#) - advice for parents and carers
- Free additional support for staff in responding to online safety issues can be accessed from the [Professionals Online Safety Helpline at the UK Safer Internet Centre](#).

## Allegations or concerns about staff

With such different arrangements young people could be at greater risk of abuse from staff or volunteers. We remind all staff to maintain the view that 'it could happen here' and to immediately report any concern, no matter how small, to the safeguarding team.



Any staff or volunteers from outside our setting will complete an induction to ensure they are aware of the risks and know how to take action if they are concerned.

We have confirmed the arrangements to contact the LADO at the local authority remain unchanged.

If necessary, the college will continue to follow the duty to refer to DBS any adult who has harmed or poses a risk of harm to a child or vulnerable adult, and to the Teacher Regulation Agency in line with paragraph 166 of Keeping Children Safe in Education 2019.

## Appendix 14 – BCoT Prevent Strategy and Action Plan 2021 -22

### National overview

The updated and strengthened CONTEST Strategy was launched in June 2018.

The aim of CONTEST is to reduce the risk to the UK and its citizens and interests overseas from terrorism, so that people can go about their lives freely and with confidence.

The CONTEST Strategy consists of the following four work stands:

- 1. Prevent**  
To stop people becoming terrorists or supporting terrorism.
- 2. Pursue**  
To stop terrorist attacks.
- 3. Protect**  
To strengthen our protection against a terrorist attack.
- 4. Prepare**  
To mitigate the impact of a terrorist attack.

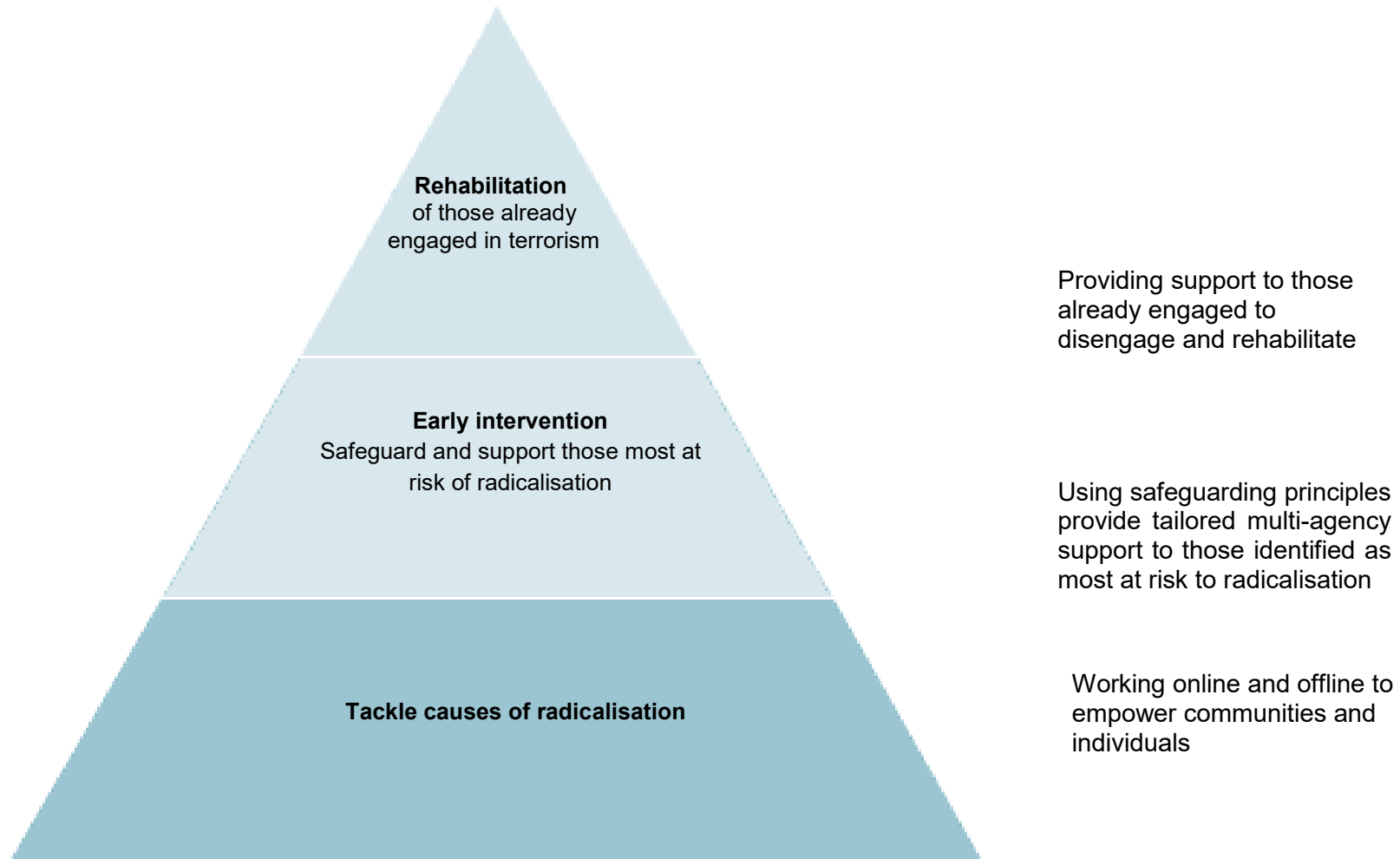
The Prevent Strategy recognises that there is no socio-demographic profile of a terrorist in the UK, and no single pathway or 'conveyor belt', leading to terrorism.

The aim of Prevent is to safeguard and support those vulnerable to radicalisation, to stop them from becoming terrorists or supporting terrorism.

The strategy also includes supporting the rehabilitation and disengagement of those already involved in terrorism.

The full CONTEST Strategy, including an overview of Prevent, can be found at [www.gov.uk/government/collections/contest](http://www.gov.uk/government/collections/contest)

The **Prevent Delivery model** below sets out the national approach to tackling the causes and risk factors that can lead to an individual becoming radicalised, support those who are at risk of radicalisation and rehabilitate those who have already engaged with terrorism.



Source: Home Office

## Definitions

The Counter Extremism Strategy (2015) defines **extremism** as; ‘the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect of different faiths and beliefs. We also regard calls for the death of our armed forces as extremist.’

**Radicalisation** is defined as; ‘the process by which a person comes to support terrorism and forms of extremism leading to terrorism’. (Prevent Strategy 2011)

**Terrorism** is defined as; ‘an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.’ (Terrorism Act 2000)

## The Counter Terrorism and Security Act 2015

On 1 July 2015, the Counter Terrorism and Security Act (CTSA) 2015 became statutory.

Section 26 of the Counter Terrorism and Security Act 2015 places a statutory Prevent Duty on specified authorities in the exercise of their functions, to have ‘due regards to the need to prevent people from being drawn into terrorism’. These authorities include Schools, Colleges, Universities, Local Authorities, Health, the Police and Prisons.’

Specific guidance on the Prevent Duty is available at

[www.gov.uk/government/publications/prevent-duty-guidance](http://www.gov.uk/government/publications/prevent-duty-guidance)

## Threat and Risk

The threat level for the UK is set by the Joint Terrorism Analysis Centre (JTAC). Threat levels are designed to give a broad indication of the likelihood of a terrorist attack:

- **Low**  
An attack is unlikely.
- **Moderate**  
An attack is possible, but not likely
- **Substantial**  
An attack is a strong possibility
- **Severe**  
An attack is highly likely
- **Critical**  
An attack is expected imminently

The current threat level from international terrorism in the UK is **severe**, which means that an attack is highly likely.

In 2021 the threat level is substantial.

The CONTEST strategy identifies the following types of terrorism that the UK faces;

- **International**  
Terrorist organisations operating in Syria and Iraq (Da’esh and Al Qa’ida and like-minded organisations).
- **Extreme right-wing**
- **Northern-Ireland related**
- **Other**  
These are often small movements in reaction to a single issue, specific

incident, or ideology

The UK continues to face an evolving threat from radicalisation, extremism and terrorism. Da'esh inspired terrorism continues to pose the most significant threat to the UK and, despite the reduction in travel to conflict zones to join terrorist organisations operating in Syria and Iraq, travel still poses a potential threat.

That said, as highlighted by the UK based terrorist attacks in 2017, and the 12 plots thwarted since the Westminster attack in March 2017, the nature of the threat has now moved to individuals and groups, often inspired by the narrative of Da'esh, to use vehicles, knives and explosives to commit acts of terror within the UK.

The threat posed from Far Right and Extreme Right Wing organisations has also evolved and can be clearly evidenced through the murder of MP Jo Cox, the terrorist attack on Finsbury Park Mosque in 2017 and the four Right Wing inspired attacks foiled in 2017.

The proscribing of National Action as a terrorist organisation highlights the serious threat posed by the Extreme Right Wing and the approach of the government to tackle this threat. More information in relation to Channel including national statistics can be found at@

- [www.gov.uk/government/publications/channel-guidance](http://www.gov.uk/government/publications/channel-guidance)
- [www.gov.uk/government/statistics/individuals-referred-to-and-supported-through-the-prevent-programme-april-2015-to-march-2016](http://www.gov.uk/government/statistics/individuals-referred-to-and-supported-through-the-prevent-programme-april-2015-to-march-2016)

The threat from terrorism is constantly evolving.

Globally, terrorist groups and networks of all ideologies continue to develop organically, exploiting social media, technology and science to further their aims and ambitions.

## BCoT Strategy

In common with other areas (such as human trafficking and child sexual exploitation) within this theme, it recognises that there is no single factor to radicalisation.

Vulnerabilities in individuals such as age, deprivation, low self-esteem, frustration and anger, along with a lack of protective factors (employment, education, family and social networks) can make an individual vulnerable to radicalisation.

The foundation of our work in Basingstoke is to safeguard vulnerable people from harm by engaging with communities, civil society groups, education providers and statutory partners.

Prevent works best when delivered in partnership with communities as cohesive and empowered communities are better equipped to reject extremist ideologies. We will therefore continue to develop and grow our network of community groups delivering Prevent based initiatives across the district.

We acknowledge that the threat posed by extremist and terrorist groups continues to evolve.

As the threat posed online continues to grow, and in line with the work being undertaken on a national level by the Home Office we will continue to work with students highlighting the risks. This will ensure that young people are developing the skills to think critically and that parents understand the dangers associated with online radicalisation and extremism.

Supporting individuals identified as being vulnerable to radicalisation and extremism at an early stage is a key part of the BCoT Prevent Strategy.

We will remain compliant with the Prevent Statutory Duty, ensuring that we continue to work in partnership with local, regional and national partners and raise awareness of Prevent and the vulnerabilities associated with radicalisation and extremism within frontline organisations and staff.

The Police and Office for Security & Counter Terrorism (OSCT) will continue to provide support to Local Authorities nationally to assist authorities in focusing on the key strategic threats, risks and vulnerabilities at a local level. This support ensures that a proportionate and effective response is delivered where required to safeguard individuals and ensure the safety of the public.

## Basingstoke College of Technology Prevent Strategy and Action Plan 2021-2022

### Leadership and Management

Action required	Current progress	By Whom	By When	Completion
Continue BCoT strategy on equality and diversity to facilitate community cohesion and mutual good relations between those from different backgrounds	Equality and diversity policy updated and promoted Inset training day Through Google classroom staff training	Assistant Principal	Dec 21	
Raise staff and learner awareness of Prevent issues whilst maintaining perspective and clarity	All staff completion of Prevent online training Refresher training	All Staff All staff	Oct 21	
Ensure effective training for staff, students and governors  Ensure new governors are aware of their responsibilities under Prevent	Sharing information from Prevent Lead to Governors and staff  Through marketing material and tutorials to raise awareness to student body  Governor update	Assistant Principal  Marketing/RAP tutors	Ongoing  Sept 21	
Ensure an appropriate response to learners whose behaviour is challenging and inappropriate, and where radicalisation is a possibility, and provide a safe place to explore	Through safeguarding process, training for staff at Inset day to ensure that they are aware of the process if they have concerns	Assistant Principal	Ongoing	Completed but ongoing
Procedure for sharing information and contacting Prevent- protocol/ DSOs/ALEXIS	Clear procedure in place	Designated safeguarding team		Completed

## Teaching, Learning and Assessment

Action required	Current progress	By Whom	By When	Completion
Ensure curriculum staff are confident in their understanding of 'British Values' and how opportunities to embed these might be taken  Developing staff confidence in developing critical thinking skills in learners and challenging extremist	Training on de-colonising the curriculum to be fed into lessons plans 2021/22	T & L team	Sept 2021	
Ensure that these same values are promoted within the personal development programme	Refresher training for RAPs in British values, PD sessions delivered across all curriculum areas	Assistant Principal  RAPs	Sept 2021  Dec 2021	

## Partnership and Community Working

Action required	Current progress	By Whom	By When	Completion
Maintain existing good relations with the Hampshire Police Prevent Co-ordinator	Meetings as appropriate with Co-ordinator but also PCSO's and Police to share concerns.	Assistant Principal	ongoing	
Make referrals to the Channel process when required		DSL		
Effective liaison with partner secondary schools and wider organisations around transition of learners	Transition Manager in post Ongoing meetings with schools Have an 'At Risk register' for potential students	Transition Manager		completed
Ensure subcontractors and partners are following college procedures in relation to Prevent	Catering team meeting given Prevent Duty Guidance Regular Contractors complete our safeguarding training/ given Prevent overview when they sign in	Catering Manager  Head of Estates/Assistant Principal	Refresher Sept 21	
Links from Parent Portal to Parents page on BCoT website with information for parents if they have worries about where to go for support	Review website	Marketing	Dec 21	



Briefing document available for invigilators/volunteers and contractors.	Check content	Assistant Principal	Dec 21	
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### Student Engagement

Action required	Current progress	By Whom	By When	Completion
Raise awareness amongst students of the Prevent Duty and of how they can report concerns as they arise	Online safety – through tutorials	RAPs	Oct 21	
	Tutorials on Ready, Respect, Safe	RAPS	Sept 21	
	Learner Voice focus groups	apprentice/ RAPs	Ongoing	
	Posters in classrooms and communal areas	Marketing	Sept 21	
	Link on eILP for students to email safeguarding team with concerns	MIS	Sept 21	

### Premises, Risk Management and Health and Safety

Action required	Current progress	By Whom	By When	Completion
Respond to local, national and international events that might impact on staff, students and visitors	Current events discussed in tutorials	RAPs	Ongoing	
ICT security	Currently have filters in place that enable reports on suspicious words.			Completed
Public relations and business continuity plans are in operation		Marketing		
Procedures are in place to cover external events that use College premises	Lettings policy and external hirers form	Head of Estates	Reviewed July 21	Completed