

Policy/Procedure Name: Safeguarding Policy

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Role Responsible: Designated Safeguarding Lead

Approved By: Curriculum Performance
Committee & SLT

Policy Version Control & Worksheet

Please ensure you complete the below table once you have checked this policy, to log acknowledgement of the sign off process.

Name	Date	Comments Made (Y/N)
Andrew Russell	04/02/21	Yes
Christine Ricketts	05/02/21	Yes
Steve Dowbiggin	09/02/21	Yes
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Sarah Glasspool	10/02/21	Yes

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1.0 Safeguarding Statement 2020

Brooklands College holds as one of its highest priorities the health, safety and welfare of all students, young people and vulnerable adults involved in courses or activities which come under the responsibility of the College. Brooklands College values everyone as an individual, treats all equally and fairly. Brooklands College is committed to learning, improving and developing themselves and others and will lead by example, we will be consistent in our approach and communicate openly and honestly, ensuring collaborative working relationships with all stakeholders.

The College has a statutory and moral duty to commit to practices that protect children, young people and vulnerable adults from abuse, neglect or significant harm.

We make every effort to provide an environment in which children, young people and adults feel safe, secure, valued and respected, and feel confident to talk if they are worried, believing they will be effectively listened to.

Key Personnel

Designated Safeguarding Lead (DSL)

Deputy Safeguarding Lead (DDSL)

safeguarding@brooklands.ac.uk

Curriculum Safeguarding Officers:

Director of Curriculum x 4

Progression Mentors x 4

Safeguarding Governor x 1

College Counsellor x 1

counselling@brooklands.ac.uk

Terminology

Safeguarding and promoting the welfare of children is defined as:

- protecting children from maltreatment;
- preventing impairment of children's health or development;
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care;
- taking action to enable all children to have the best outcomes.
- preventing impairment of children's mental or physical health or development

Abuse: could mean neglect, physical, emotional, sexual or a combination of these.
Appendix 1

A child: is defined as under the age of 18 years

An Adult at Risk: is defined as someone 18 years of age or over who is or may need to receive community care services by reason of mental health or other disability, age or illness and who may be unable to take care of themselves or protect themselves against significant harm or exploitation

Prevent: The Prevent Strategy has three main objectives: responding to the ideological challenge of terrorism and the threat we face from those who promote it; preventing people being drawn into terrorism and ensure they are given appropriate advice and support; working with sectors and institutions where there are risks of radicalisation.

Students: For the purpose of this policy and in the context of a post 16 environment, children, young people and adults at risk will be referred to as students with appropriate adaptations applied to the procedures.

Staff: Applies to all those working for or on behalf of the College, full or part time in either a paid or voluntary capacity including, for example, members of the Governing Body, visitors, contractors, sub-contracting partners and franchised staff.

2.0 Introduction

The College's policy is that safeguarding of both students and staff will be central to all its work. This covers all matters connected with students 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 students under the age of 18 and to that of vulnerable adults

This policy has been developed in accordance with the principles established by the: Children Acts 1989 and 2004; the Education Act 2002, Working Together to Safeguard Children 2018, Revised Safeguarding Statutory Guidance 'Framework for the Assessment of Children in Need and their Families' 2000, 'What to do if You Are Worried a Child is Being Abused' 2015. Safeguarding Vulnerable Groups Act 2006; The Care Act 2014; Surrey Adult

Safeguarding Board; Counter-Terrorism and Security Act 2015; Prevent Duty Guidance 2015; Guidance for safer working practice for those working in education settings 2015. The policy also reflects, both statutory guidance 'Keeping Children Safe in Education' 2020 (KCSIE), and [Surrey Safeguarding Children Partnership](#) (SSCP) Procedures.

In accordance with The Children Act 1989 and 2004, throughout this policy, where reference is made to 'children and young people', this term is used to mean those under the age of 18. The Children Act 2004 also includes young people under 21 who have a learning disability or who have been looked after by a local authority after the age of 16. Further to this, the College recognises that some adults are also vulnerable to abuse and these are referred to as a 'vulnerable adult' which is defined as someone 18 years of age or over who is or may need to receive community care services by reason of mental health or other disability, age or illness and who may be unable to take care of themselves or protect themselves against significant harm or exploitation.

The Governing body takes seriously its responsibility under section 175/157 of the Education Act 2002 to safeguard and promote the welfare of all students.

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. Brooklands College acknowledges that it is not the College's role to investigate whether abuse has taken place as only Children's Services, the Police and NSPCC have 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.

3.0 Policy aims

- The welfare of the all students is paramount
- To maintain an attitude of "It could happen here"
- All students have a right to be protected from harm and abuse and to feel safe and secure, they cannot learn effectively without doing so
- To raise awareness of all staff that they have a role in the prevention of harm and abuse and are equally responsible to act immediately on any suspicion or disclosure that may indicate a student is at risk of harm, either in the College or in the community
- To provide a structured framework and procedure which will be followed by all staff in cases of suspected abuse ensuring consistent good practice across the College.
- To ensure that all staff working within the College, have been checked for their suitability, including, verification of their identity and qualifications, a satisfactory DBS check and a single central record is kept for audit.
- To develop and promote effective working in partnership with other agencies
- To work openly with parents as far as possible, however Brooklands College reserves the right to contact Social Care or the police, without notifying parents if this is believed to be in the child's best interests.
- To inform parents and carers how we will safeguard their children whilst they are in our care.

4.0 Scope

This policy and its procedures apply to all staff and students at the College (including those who are Brooklands College students learning off site).

Safe College, Safe Staff, Safe Students

The College will

- Adopt a student-centred approach
- Have a preventative approach to safeguarding all students from potential harm or damage
- Take all appropriate actions to address concerns about the welfare of all students
- Ensure all staff have information about the College's safeguarding arrangements, safeguarding policy and procedures, staff behaviour policy, the role and names of the Designated Safeguarding Lead and Deputies, and Keeping Children Safe in Education 202 part 1 annex A. This will apply to the Governing Body in relation to part 2 of the same guidance'
- Plan, implement, monitor and review policies and procedures to ensure that the maximum is done to provide a safe environment for all students in the College.
- Complete thorough assessments and risk management, incorporating the Student Health and Wellbeing Support to Study policy where necessary
- Provide all staff and governors with regular safeguarding awareness training, to maintain their understanding of the signs and indicators of abuse.
- Ensure that relevant Health and Safety procedures are in place
- Take safeguarding into account during staff selection, recruitment, induction, supervision and training, and HR keeps a single central register for all staff and volunteers which lists the check have been carried out and the date they were completed
- Follow the Protocol of police on site
- Create and promote a safe and open work culture in line with the College core values - Respect & Compassion, Innovation and Integrity

5.0 Roles and Responsibilities

All members of staff have a duty to ensure the welfare of students is the primary consideration above all others and to report safeguarding concerns, including suspected or alleged abuse, to a Designated Safeguarding Lead.

All those working at Brooklands College must be familiar with, and follow, the College's procedures and protocols for promoting and safeguarding the welfare of students in the College and know who to contact to express concerns about a child/young person's welfare.

All College Staff will

- Understand that it everyone’s responsibility to safeguard and promote the welfare of students and that they have a statutory role to play in identifying concerns, sharing information and taking prompt action
- Read Keeping Children Safe in Education 2020, part 1 and Annex A and the Safeguarding Policy
- Be aware of ‘what abuse is’ and the indicators (*Appendix 1*)
- Know how to respond to a student who discloses harm or abuse and maintain appropriate confidentiality
- Establish and maintain an environment where students feel secure, are encouraged to talk and are listened to. And consider at all times the best interest of the student.
- Consider the impact of remote learning and seek out the students who are keen to remain hidden from view both verbally and by camera in lessons
- Recognize the signs of students becoming isolated from their peers and ‘check in’ on them regularly
- Recognize that ongoing attendance issues can be more than a student ‘just not being bothered’, explore further with the student and or parent/carers, raise any concerns
- Treat information with confidentiality but never promising to “keep a secret”.
- Ensure all staff are aware that mental health problems can, in some cases, be an indicator that a student has suffered or is at risk of suffering abuse, neglect or exploitation.
- Where students have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences (ACE’s), this can have a lasting impact throughout childhood, adolescence and into adulthood. Staff are aware of how these student’s experiences can impact on their mental health, behaviour and education.
- Where a staff member has a mental health concern about a student that is also a safeguarding concern, immediate action will be taken, following our safeguarding policy and procedure and speaking to the Designated Safeguarding Lead or the Deputy designated Safeguarding Lead and or a Progression Mentor.
- Record their concerns via My Concern (**see point 8.0**) if they are worried or a student is being abused and report these to the DSL that day if at immediate risk. If the DSL is not contactable the Deputy DSL should be informed.
- Support the Safeguarding Team, social workers and other agencies following a referral
- Be aware of systems within the College which support safeguarding, which is explained as part of staff induction and attend update training offered during CPD
- Assist the Governing Body and Principal in fulfilling their safeguarding responsibilities set out in legislation and statutory guidance.

The Principal

In addition to the role and responsibilities of all staff, the Principal; will ensure that:

- The College fully contributes to inter-agency working in line with Working Together to Safeguard Children 2018 guidance.
- The Safeguarding Policy and procedures are implemented and followed by all staff and are embedded into the culture of the organization.
- All staff are aware of the role of the Designated Safeguarding lead (DSL), including the identity of the DSL and any deputies.

- Sufficient time, training, support, funding, resources, including cover arrangements where necessary, is allocated to the DSL to carry out their role effectively, including the provision of advice and support to College staff and governors on child welfare and safeguarding matters, to take part in strategy discussions/meetings and other inter-agency meetings and/or support other staff to do so; and to contribute to the assessment of students.
- That opportunities are provided for a co-ordinated offer of early help when additional needs of students are identified.
- Deputy DSLs are trained to the same standard as the DSL and the role is explicit in their job description.
- Adequate and appropriate DSL cover arrangements are in place for any out of hours
- Where there is a safeguarding concern that the student's wishes and feelings are taken into account when determining what action to take and what services to provide.
- All staff feel able to raise concerns about poor or unsafe practice and that such concerns are handled sensitively and in accordance with the whistle-blowing procedures.
- Students are provided with opportunities through teaching, learning and tutorials to learn about safeguarding, including keeping themselves safe online.
- That allegations or concerns against staff are dealt with in accordance with guidance from the Department for Education (DfE), Surrey Safeguarding Children Partnership (SSCP) and Surrey County Council (SCC).
- That statutory requirements are met to make a referral to the Disclosure and Barring Service and additionally in the case of teaching staff the Teacher Regulation Agency where they think an individual has engaged in conduct that harmed (or is likely to harm) a child; or if the person otherwise poses a risk of harm to a child.

The Designated Safeguarding Lead (DSL)

In addition to the role and responsibilities of all staff the DSL will:

- Hold the lead responsibility for safeguarding (including online safety) in the College, this responsibility is not able to be delegated.
- The designated safeguarding lead and any deputies will liaise with the three safeguarding partners and work with other agencies in line with Working Together to Safeguard Children. NPCC
- When to call the police should help designated safeguarding leads understand when they should consider calling the police and what to expect when they do.
- Manage and submit a Request for Support Form for a child if there are concerns about suspected harm or abuse, to the Children's Single Point of Access (C-SPA), and act as a point of contact and support for College staff. Requests for support should be made securely by email to cspa@surreycc.gov.uk using the [Request for Support Form](#) urgent referrals should be made by telephone 0300 470 9100 (and ask for the priority line).
- Report concerns that a student may be at risk of radicalisation or involvement in terrorism, following the [Prevent referral process](#) and use the Prevent referral form to refer cases by e-mail to preventreferrals@surrey.pnn.police.uk . If the matter is urgent then Police must be contacted by dialling 999. In cases where further advice

from the Police is sought dial 101 or 01483 632982 and ask to speak to the Prevent Supervisor for Surrey

- The Department of Education has also set up a dedicated telephone helpline for staff and governors to raise concerns around Prevent (020 7340 7264)
- Refer cases where a crime may have been committed to the Police as required.
- Liaise with the “case manager” and Local Authority Designated Officer(LADO) for child protection concerns in cases which concern a member of staff or a volunteer; and refer cases where a person is dismissed or left service due to risk/harm to a child to the Disclosure and Barring Service and Teaching Regulation Agency, as required.
- Follow DfE and KCSIE guidance on ‘Peer on Peer/Child on Child Abuse’ when a concern is raised that there is an allegation of a Student abusing another student within the College.
- Be available during term time (during College hours) for staff in College to discuss any safeguarding concerns. Appropriate and adequate cover arrangements will be arranged by the DSL and the College Senior leadership for out of hours.
- Act as a source of support and expertise in carrying out safeguarding duties for the whole College community
- Encourage and promote a culture of listening to students and taking account of their wishes and feelings, amongst all staff.
- Access training and support to ensure they have the knowledge and skills required to carry out the role. DSL training should be updated at least every two years and their knowledge and skills refreshed at regular intervals but at least annually
- Have a secure working knowledge of SSCP procedures and understand the assessment process for providing early help and statutory intervention, including the local authority levels of need criteria and referral arrangements.
- Have a clear understanding of access and referral to the local early help offer and will support and advise members of staff where early help intervention is appropriate.
- Understand and support the College delivery with regards to the requirements of the Prevent duty and provide advice and guidance to staff on protecting students from radicalisation.
- Liaise with all College staff (but specifically the DDSL, Director of Curriculum, Progression Mentors and the Counsellor) on matters of safety and safeguarding and consult the SSCP Levels of Need document to inform decision making and liaison with relevant agencies
- Be alert to the specific needs of students in need, those with SEND and young carers
- Understand the risks associated with online activity and be confident that they have the up to date knowledge and capability to keep students safe whilst they are online at College; in particular, understand the additional risks that students with SEND face online and the associated and appropriate support they require.
- Keep detailed, accurate records (either written or using appropriate secure online software), that include all concerns about a student even if there is no need to make an immediate referral and record the rationale for decisions made and action taken.
- Ensure that when a student transfers education establishments (including in-year), their safeguarding file is passed to the new Education establishment as soon as possible, and within statutory timescales and that confirmation of receipt is received. If the student is on a child protection plan or is a child looked after, their social worker is to be informed
- Ensure that all staff sign to say they have read, understood and agree to work within the College’s Safeguarding policy, staff behaviour policy (code of conduct) and

Keeping Children Safe in Education (KCSIE) 2020 Part 1 and annex A and ensure that the policies are used effectively.

- Organise safeguarding induction, regularly updated training and a minimum of annual updates (including online safety) for all college staff, keep a record of attendance and address any absences.
- Ensure that in collaboration with the College leadership and governors, the safeguarding policy is reviewed annually and the procedures and implementation are updated and reviewed regularly.
- Ensure that the safeguarding policy is available publicly and that parents are aware that referrals about suspected harm and abuse will be made and the role of the College in this.
- Establish and maintain links with the Local Authority safeguarding partners to make sure staff are aware of training opportunities and the latest policies on local safeguarding arrangements
- Contribute to and provide, with the Principal and Chair of Governors, the “Audit of Statutory Duties and Associated Responsibilities” to be submitted annually to the Surrey County Council, Education Safeguarding Team.
- Meet all other responsibilities as set out for DSLs in Keeping Children Safe in Education 2020.

The Deputy Designated Safeguarding Lead (DDSL)

In addition to the role and responsibilities of all staff the Deputy DSL will:

- Be trained to the same standard as the Designated Safeguarding Lead and the role is explicit in their job description.
- Provide support and capacity to the DSL in carrying out delegated activities of the DSL; however, the lead responsibility of the DSL cannot be delegated.
- In the absence of the DSL, carries out the activities necessary to ensure the ongoing safety and protection of students. In the event of the long-term absence of the DSL the deputy will assume all of the functions above.

Safeguarding Officers

Director of Curriculum (DoCs) and Progression Mentors (PMs) - Safeguarding Officers are based in curriculum areas working across both the Weybridge and Ashford campuses and across their departments/areas.

These designated staff:

- Report, in relation to Safeguarding issues, to the member of staff with lead responsibility (DSL) and or the Deputy (DDSL)
- Have received additional training in safeguarding and how to manage safeguarding concerns and incidents
- Know how to make an appropriate referral
- Are available to provide advice and support to staff on issues relating to safeguarding
- Are available to support and listen to all students raised as a safeguarding concern
- Will keep detailed, accurate records (either written or using appropriate secure online software), that include all concerns about a student and record the rationale for decisions made and action taken.

College counsellor

The counsellor works across both campuses, they

- Report to the member of staff with lead responsibility (DSL)
- Have received additional training in safeguarding and how to manage safeguarding concerns and incidents
- Know how to make an appropriate referral
- Are available to provide advice and support to staff on issues relating to safeguarding
- Are available to listen to all students studying with the College
- Provide individual counselling sessions for students who are experiencing personal difficulties and work with them in accordance with the BACP Ethical Framework.
- Provide awareness training i.e. mental health, anxiety, self-harm to staff via team meetings and or professional development days
- Keep detailed, accurate records (either written or using appropriate secure online software), that include all concerns about a student and rationale for decisions made and action taken.

All members of The Governing Body understand and fulfil their responsibilities to ensure that

- The College has effective safeguarding policies and procedures including, a Staff Behaviour Policy or Code of Conduct, a Behaviour Policy
- Policies are consistent with Surrey Safeguarding Children Partnership (SSCP) and statutory requirements, are reviewed annually and that the Safeguarding policy is available on the College website.
- The SSCP is informed in line with local requirements about the discharge of duties via the annual safeguarding audit.
- The College operates a safer recruitment procedure that includes statutory checks on staff suitability to work with children and disqualification by association regulations and by ensuring that there is at least one person on every recruitment panel who has completed safer recruitment training, if there is not a panel conducting interviews then the individual will have completed the safer recruitment training
- At least one member of the governing body (excluding the principal) has completed safer recruitment training to be repeated every five years.
- Staff have been trained appropriately and this is updated in line with guidance and all staff have read and understood Keeping Children Safe in Education 2020 part 1 and Annex A and that mechanisms are in place to assist staff in understanding and discharging their roles and responsibilities as set out in the guidance.
- All staff including temporary staff and volunteers are provided with the college's Safeguarding and Staff Code of Conduct policy.
- The College has procedures for dealing with allegations of abuse against staff (including the Principal), volunteers and against other students and that a referral is made to the DBS and/or the Teaching Regulation Agency (if applicable) if a person in regulated activity has been dismissed or removed due to safeguarding concerns, or would have had they not resigned.

- A nominated governor for safeguarding is identified.
- A member of the senior leadership team has been appointed by the Governing Body as the Designated Safeguarding Lead (DSL) who will take lead responsibility for safeguarding and that the role is explicit in the role holder's job description.
- On appointment, the DSL and deputy(s) undertake interagency training (SSCP Foundation - Modules 1&2) and also undertake DSL 'New to Role' and 'Update' training every two years as well as attending DSL network events, to refresh knowledge and skills.
- Students are taught about safeguarding (including online safety) as part of the tutorial programme
- The College will ensure appropriate online filtering and monitoring systems are in place to safeguard students online
- The College will comply with regular data returns requested by the Local Authority, regarding all pupils, of statutory school age, attending alternative provision and/or on a reduced or modified timetable
- Enhanced DBS checks (without barred list checks, unless the governor is also a volunteer at the school) are in place for all Governors.
- Any weaknesses in Safeguarding are remedied immediately.

6.0 Confidentiality, Sharing and Withholding Information

All matters relating to safeguarding will be treated as confidential and only shared as per the ['Information Sharing Advice for Practitioners' \(DfE 2018\) guidance](#).

Information will be shared with staff within the College who 'need to know'.

All staff must be aware that they have a professional responsibility to share information with other agencies in order to safeguard students and that the Data Protection Act 1998 and General Data Protection Regulations are not a barrier to sharing information where a failure to do so would place a child at risk of harm. There is a lawful basis for safeguarding concerns to be shared with agencies who have a statutory duty for child protection.

All staff must be aware that matters relating to safeguarding are personal to students and their families, in this respect they are confidential and the Principal, DSL, DDSL and or Safeguarding Officers will only disclose information about a child to other members of staff on a need to know basis.

The DSL/DDSL will always undertake to gain parent/carers consent to refer a child to Social Care unless to do so could put the child at greater risk of harm or impede a criminal investigation.

7.0 Safeguarding Procedures

The aim of this procedure is to provide a robust framework, to ensure that all staff take appropriate action when they are worried that a student is at risk or harm and or being abused. It is the responsibility of all staff working within the College, to record and refer safeguarding concerns, even if they are just suspicions or overheard rumours, but they should not discuss this with anyone other than a member of the Safeguarding Team.

All staff must be alert to, and aware of the signs of abuse, these may include changes in behaviour or a failure to perform or develop as expected. However, recognising abuse may be difficult and staff need to take notice not only of major incidents but also other signs which may cause concerns. i.e. parental separation, bereavement, ill health, financial difficulties. Try and give the student an opportunity to talk and ask if they are ok.

What should be referred to the Safeguarding Team?

***Specific Safeguarding Issues include:**

- Abuse and neglect
- Adults at risk
- Children missing education
- Child/Sexual Exploitation (CSE)
- Child Criminal Exploitation (CCE): County lines, criminal behaviour and gang involvement
- Domestic Abuse
- Drugs and alcohol misuse, including legal highs
- Female Genital Mutilation
- Forced Marriage
- Homelessness/missing from home or care/private fostering
- Honour based Violence
- Mental Health/Self-harm/Suicidal
- Online safety
- Parental substance abuse, mental health and domestic abuse
- Peer on Peer abuse (sexual violence & harassment, relationship abuse, criminal behaviour)
- Preventing Radicalisation and Extremism
- Youth produced sexual imagery (sexting)

Students who are particularly vulnerable, so to ensure that all of our students receive equal protection the safeguarding team will offer additional support and will give special consideration to those who are:

- Looked after children(LAC) and previously Looked after children
- On Child Protection Plans (CP)
- Children in Need (CIN)
- Asylum seekers
- Young Carers
- Living away from home/private fostering
- Children in the court systems/Youth Offending Teams (YOT)/ pending police investigations

If staff become aware of students within these specific groups, this information should be referred to the safeguarding team.

What to do if a student makes a disclosure?

A student who makes a disclosure may have to tell their story on a number of occasions to the police and/or social workers. Therefore, it is vital that their first experience of talking to a trusted adult is a positive one.

During their conversation with a student staff will:

- Listen to what the student has to say and allow them to speak freely
- Remain calm and not overreact or act shocked – the student may stop talking if they feel they are upsetting the listener
- Reassure the student that it is not their fault and they have done the right thing in telling someone
- Not be afraid of silences – staff must remember how difficult it is for the student and allow them to talk
- Take what the student is disclosing seriously
- Ask open questions and avoid leading questions
- Avoid jumping to conclusions, speculation or make accusations
- Not automatically offer any physical touch as comfort. It may be anything but comforting to a student who is being abused
- Avoid admonishing the student for not disclosing sooner.
- Tell the student what will happen next If the student talks to any member of staff about any risks to their safety or wellbeing the staff member will let the student know that they will have to pass the information on - staff are not allowed to keep secrets.

***Further information about each of the above can be found in the appendices**

8.0 How to make a referral to the Safeguarding Team

My Concern: Sign into My Concern and click on the REPORT tab, complete the report and submit, it will automatically be sent to the Safeguarding Team, outlining that a safeguarding concern has been raised.

However, if the student is at immediate risk, contact a member of the Safeguarding team or as a last resort contact Reception and request an 'On call Manager'

Email: Use the dedicated email service: safeguarding@brooklands.ac.uk. for advice and guidance only or **Telephone:** 01932 797670

In Person: DSL/DDSL offices are based on the first floor of the Locke King building, and we operate an open door policy for staff and students

Office hours (Monday to Friday) the Safeguarding Team will ensure that all safeguarding referrals are responded to and will be available to speak to students.

Normal working hours: Mon to Fri, 9am to 5 pm After 5pm: On weekdays or at the weekend, safeguarding responsibility passes to the Surrey C-Spa **Telephone:** 01483 517898 (out of hours hosted by the emergency duty team) **E-mail** cspa@surreycc.gov.uk

What happens next?

It is important that concerns are followed up and it is everyone's responsibility to ensure that they are. If appropriate the member of staff will be informed by the DSL or DDSL what has happened following a report being made.

If they have concerns that the disclosure has not been acted upon appropriately they might inform the Principle or Safeguarding Governor of the College and/or may contact the C-SPA.

Receiving a disclosure can be upsetting for the member of staff; the safeguarding team are available to support staff after any disclosure. This might include reassurance that they have followed procedure correctly and that their swift actions will enable the allegations to be handled appropriately.

In some cases, additional counselling might be needed, and staff are encouraged to recognize that disclosures can have an impact on their own emotions. All staff have access to Aviva Counselling helpline, which is completely confidential - further details can be found on the HR and H&S Microsite

9.0 Safeguarding concerns and allegations against adults who work with children

This procedure should be used in all cases in which it is alleged a member of staff, including supply staff or volunteers in a College, or another adult who works with children has:

- behaved in a way that has harmed a child, or may have harmed a child;
- possibly committed a criminal offence against or related to a child; or
- behaved towards a child or children in a way that indicates he or she would pose a risk of harm to children
- behaved or been involved in an incident outside of a setting which did not involve children but could impact on their suitability to work with children

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

- Report any concerns about the conduct of any member of staff or volunteer to the DSL or Principal immediately.
- If an allegation is made against the Principle, the concerns need to be raised with the Chair of Governor as soon as possible. If the Chair of Governors is not available, then the LADO should be contacted directly.

There may be situations when the Principle, DSL or Chair of Governors will want to involve the police immediately if the person is deemed to be an immediate risk to a student or there is evidence of a possible criminal offence.

Once an allegation has been received by the Principle, DSL, or Chair of Governors they will contact the LADO (as part of their mandatory duty) on 0300123 1650 option 3 LADO or Email: LADO@surreycc.gov.uk immediately and before taking any action or investigation.

Following consultation with the LADO inform the parents of the allegation unless there is a good reason not to

In liaison with the LADO, the College will determine how to proceed and if necessary, the LADO will refer the matter to Children's Social Care and/or the police.

If the matter is investigated internally, the LADO will advise the College to seek guidance from local authority colleagues in following procedures set out in part 4 of 'Keeping Children Safe in Education' (2020) and the SSCP procedures.

10. Whistle-blowing

We recognise that students cannot be expected to raise concerns in an environment where staff fail to do so.

All staff should be aware of their duty to raise concerns, where they exist, about the management of child protection, which may include the attitude or actions of colleagues, poor or unsafe practice and potential failures in College's safeguarding arrangements. They should speak to the individual in the first instance, or disclose verbally or in writing to the individual's line manager so that appropriate action can be taken. If it is inappropriate to make such a disclosure to the individual or their line manager, a worker can raise the issue with their Director of Curriculum. If it becomes necessary to consult outside the College, they should speak to the LADO in accordance with the Whistleblowing Policy.

The NSPCC whistleblowing helpline is available 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 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.

Whistle-blowing regarding the Principal should be made to the Chair of the Governing Body whose contact details are available to staff.

The Safeguarding Policy links with other College policies:

Equality & Diversity Policy
E-Safety, including staff use of mobile phones
Health & Safety
Prevent - Radicalisation and Extremism
Recruitment and Selection
Staff Behaviour Policy / Code of Conduct
Student Code of Conduct
Whistleblowing

Guidance and documents referred to in this policy

Surrey Safeguarding Children Partnership protocols, guidance and procedures
Working Together to Safeguard Children 2018
Keeping Children Safe in Education 2020 (KCSIE)
Disqualification under the Childcare Act 2006 (updated 2019)
FGM Act 2003 Mandatory Reporting Guidance 2016
'What to do if you are worried a child is being abused' 2015

Information Sharing Advice for Practitioners' guidance 2018

SCC Children Missing Education

The Equality Act 2010

<https://www.gov.uk/government/publications/covid-19-safeguarding-in-schools-colleges-and-other-providers/coronavirus-covid-19-safeguarding-in-schools-colleges-and-other-providers>

Appendices pages 18 - 37

1. What is child abuse?
2. Sexual violence and sexual harassment between students in Colleges & Harmful Sexual Behaviour
3. Prevent Duty & Radicalisation, Extremism and Terrorism
4. Female Genital Mutilation (FGM), Forced Marriages & Honour based Abuse
5. Domestic Abuse
6. Mental Health
7. Child Sexual Exploitation (CSE)
8. Child Criminal Exploitation (CCE) & Gangs
9. Online Safety
10. Youth produced sexual imagery (sexting)
11. Children Missing Education
12. Looked After Child (LAC) & Fostering Arrangements
13. Further advice on safeguarding and child protection

Appendix 1 - What is child abuse?

The following definitions are taken from *Working Together to Safeguard Children* HM Government (2018). In addition to these definitions, it should be understood that children can also be abused by being sexually exploited, honour based violence, forced marriage or female genital mutilation. To

support the local context, all staff have access to the [Surrey Safeguarding Children Partnership Levels of Need Threshold Document](#).

What is abuse and neglect?

Abuse and neglect are forms of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to 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 a stranger. They may be abused by an adult or adults, or another child or children.

Physical abuse

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.

Emotional abuse

The persistent emotional maltreatment of a child such as to cause severe and persistent 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 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, although it may occur in isolation.

Sexual abuse

Involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including online).

Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

Neglect

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

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)
- ensure access to appropriate medical care or treatment

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

The [Neglect Risk Assessment Tool](#) is available to provide more detailed information regarding the assessment of neglect.

Indicators of abuse

Neglect

The nature of neglect

Neglect is a lack of parental care but poverty and lack of information or adequate services can be contributory factors.

Far more children are registered to the category of neglect on Child in Need and Child Protection plans than to the other categories. As with abuse, the number of children experiencing neglect is likely to be much higher than the numbers on the plans.

Neglect can include parents or carers failing to:

- provide adequate food, clothing and shelter
- protect a child from physical and emotional harm or danger
- ensure adequate supervision or stimulation
- ensure access to appropriate medical care or treatment

NSPCC research has highlighted the following examples of the neglect of children under 12 years old

- frequently going hungry
- frequently having to go to school in dirty clothes
- regularly having to look after themselves because of parents being away or having problems such as drug or alcohol misuse
- being abandoned or deserted
- living at home in dangerous physical conditions
- not being taken to the doctor when ill
- not receiving dental care.

Neglect is a difficult form of abuse to recognize and is often seen as less serious than other categories. It is, however, very damaging: children who are neglected often develop more slowly than others and may find it hard to make friends and fit in with their peer group.

Neglect is often noticed at a stage when it does not pose a risk to the child. The duty to safeguard and promote the welfare of children (*What to do if You're Worried a Child is Being Abused* DfE 2015) would suggest that an appropriate intervention or conversation at this early stage can address the issue and prevent a child continuing to suffer until it reaches a point when they are at risk of harm or in significant need.

Neglect is often linked to other forms of abuse, so any concerns school staff have should be discussed with the DSL.

Indicators of neglect

The following is a summary of some of the indicators that may suggest a child is being abused or is at risk of harm.

It is important to recognise that indicators alone cannot confirm whether a child is being abused. Each child should be seen in the context of their family and wider community and a proper assessment carried out by appropriate persons. What is important to keep in mind is that if you feel unsure or concerned, do something about it. Don't keep it to yourself. The [Neglect Risk Assessment Tool](#) provides staff with a resource to identify and act on concerns regarding neglect.

Physical indicators of neglect

- Constant hunger and stealing food
- Poor personal hygiene - unkempt, dirty or smelly
- Underweight
- Dress unsuitable for weather
- Poor state of clothing
- Illness or injury untreated

Behavioural indicators of neglect

- Constant tiredness
- Frequent absence from school or lateness
- Missing medical appointments
- Isolated among peers
- Frequently unsupervised
- Stealing or scavenging, especially food
- Destructive tendencies

Emotional abuse

The nature of emotional abuse

- Most harm is produced in *low warmth, high criticism* homes, not from single incidents.
- Emotional abuse is difficult to define, identify/recognise and/or prove.
- Emotional abuse is chronic and cumulative and has a long-term impact.
- All kinds of abuse and neglect have emotional effects although emotional abuse can occur by itself.

- Children can be harmed by witnessing someone harming another person – as in domestic abuse.

It is sometimes possible to spot emotionally abusive behaviour from parents and carers to their children, by the way that the adults are speaking to, or behaving towards children. An appropriate challenge or intervention could affect positive change and prevent more intensive work being carried out later on.

Indicators of emotional abuse

Developmental issues

- Delays in physical, mental and emotional development
- Poor school performance
- Speech disorders, particularly sudden disorders or changes.

Behaviour

- Acceptance of punishment which appears excessive
- Over-reaction to mistakes
- Continual self-deprecation (I'm stupid, ugly, worthless etc)
- Neurotic behaviour (such as rocking, hair-twisting, thumb-sucking)
- Self-mutilation
- Suicide attempts
- Drug/solvent abuse
- Running away
- Compulsive stealing, scavenging
- Acting out
- Poor trust in significant adults
- Regressive behaviour – e.g., wetting
- Eating disorders
- Destructive tendencies
- Neurotic behaviour
- Arriving early at school, leaving late

Social issues

- Withdrawal from physical contact
- Withdrawal from social interaction
- Over-compliant behaviour
- Insecure, clinging behaviour
- Poor social relationships

Emotional responses

- Extreme fear of new situations
- Inappropriate emotional responses to painful situations (“I deserve this”)
- Fear of parents being contacted
- Self-disgust
- Low self-esteem

- Unusually fearful with adults
- Lack of concentration, restlessness, aimlessness
- Extremes of passivity or aggression

Physical abuse

The nature of physical abuse

- Most children collect cuts and bruises quite routinely as part of the rough and tumble of daily life. Clearly, it is not necessary to be concerned about most of these minor injuries. But accidental injuries normally occur on the *bony prominences* – e.g. knees, shins.
- Injuries on the *soft* areas of the body are more likely to be inflicted intentionally and should therefore make us more alert to other concerning factors that may be present.
- A body map can assist in the clear recording and reporting of physical abuse (this can be found on My Concern). The body map should only be used to record observed injuries and no student should be asked to remove clothing by a member of staff of the College.

Indicators of physical abuse / factors that should increase concern

- Multiple bruising or bruises and scratches (especially on the head and face)
- Clusters of bruises – e.g., fingertip bruising (caused by being grasped)
- Bruises around the neck and behind the ears – the most common abusive injuries are to the head
- Bruises on the back, chest, buttocks, or on the inside of the thighs
- Marks indicating injury by an instrument – e.g., linear bruising (stick), parallel bruising (belt), marks of a buckle
- Bite marks
- Deliberate burning may also be indicated by the pattern of an instrument or object – e.g., electric fire, cooker, cigarette
- Scalds with upward splash marks or *tide marks*
- Untreated injuries
- Recurrent injuries or burns
- Bald patches.

In the context of the school, it is normal to ask about a noticeable injury. The response to such an enquiry is generally light-hearted and detailed. So, most of all, concern should be increased when:

- the explanation given does not match the injury
- the explanation uses words or phrases that do not match the vocabulary of the child (adults' words)
- no explanation is forthcoming
- the child (or the parent/carer) is secretive or evasive
- the injury is accompanied by allegations of abuse or assault

You should be concerned if a child:

- is reluctant to have parents/carers contacted
- runs away or shows fear of going home
- is aggressive towards themselves or others
- flinches when approached or touched

- is reluctant to undress to change clothing for sport
- wears long sleeves during hot weather
- is unnaturally compliant in the presence of parents/carers.
- has a fear of medical help or attention
- admits to a punishment that appears excessive.

Sexual Abuse

The nature of sexual abuse

Sexual abuse is often perpetrated by people who are known and trusted by the child – e.g., relatives, family friends, neighbours, babysitters, and people working with the child in school, faith settings, clubs or activities. Children can also be subject to child sexual exploitation.

Sexual exploitation is seen as a separate category of sexual abuse. The [SSCP professional guidance](#) provides school staff with information regarding indicators of CSE (further information about CSE is available on pages 45-46).

Characteristics of child sexual abuse:

- it is often planned and systematic – people do not sexually abuse children by accident, though sexual abuse can be opportunistic
- grooming the child – people who abuse children take care to choose a vulnerable child and often spend time making them dependent (this may occur online)
- grooming the child's environment – abusers try to ensure that potential adult protectors (parents and other carers especially) are not suspicious of their motives.

Most people who sexually abuse children are men, but some women sexually abuse too.

Indicators of sexual abuse

Physical observations:

- Damage to genitalia, anus or mouth
- Sexually transmitted diseases
- Unexpected pregnancy, especially in very young girls
- Soreness in genital area, anus or mouth and other medical problems such as chronic itching
- Unexplained recurrent urinary tract infections and discharges or abdominal pain

Behavioural observations:

- Sexual knowledge inappropriate for age
- Sexualised behaviour or affection inappropriate for age
- Sexually inappropriate behaviour
- Hinting at sexual activity
- Inexplicable decline in education progress
- Depression or other sudden apparent changes in personality as becoming insecure
- Lack of concentration, restlessness, aimlessness
- Socially isolated or withdrawn

- Overly-compliant behaviour
- Acting out, aggressive behaviour
- Poor trust or fear concerning significant adults
- Regressive behaviour,
- Onset of wetting, by day or night; nightmares
- Arriving early at school, leaving late, running away from home
- Suicide attempts, self-mutilation,
- Suddenly drawing sexually explicit pictures
- Eating disorders or sudden loss of appetite or compulsive eating
- Regressing to younger behaviour patterns such as thumb sucking or bringing out discarded cuddly toys
- Become worried about clothing being removed
- Trying to be 'ultra-good' or perfect; overreacting to criticism

Appendix 2 - Sexual violence and sexual harassment between students in colleges & Harmful Sexual Behaviour

Sexual violence and sexual harassment between students in colleges

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

Students 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 education 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 students and college staff are supported and protected as appropriately.

Harmful Sexual Behaviour

The [Brook Traffic Light Tool](#) uses a traffic light system to categorise the sexual behaviours of young people and is designed to help professionals:

- Make decisions about safeguarding children and young people
- Assess and respond appropriately to sexual behaviour in children and young people
- Understand healthy sexual development and distinguish it from harmful behaviour
- By categorising sexual behaviours, the College can work with other agencies to the same standardised criteria when making decisions and can protect children and young people with a multi-agency approach.

The College recognises that it is vital that professionals agree on how behaviours should be categorised regardless of culture, faith, beliefs, and their own experiences or values.

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 for sex

Appendix 3 - Prevent Duty & Radicalisation, Extremism and Terrorism

[The Prevent Duty for England and Wales \(2015\)](#) under section 26 of the Counter-Terrorism and Security Act 2015 places a duty on education and other children's services to have due regard to the need to prevent people from being drawn into terrorism.

Extremism is defined as 'vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs'. We also include in our definition of extremism calls for the death of members of our armed forces, whether in this country or overseas.

Terrorism is an action that endangers or causes serious violence to a person/people; causes serious violence to a person/people; causes serious damage to property; or seriously interferes with 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.

Some students are at risk of being radicalised; adopting beliefs and engaging in activities which are harmful, criminal or dangerous. This can happen both online and offline.

The College is clear that exploitation of vulnerable students and radicalisation should be viewed as a safeguarding concern and follows the Department for Education guidance for schools/colleges and childcare providers on preventing student and young people from being drawn into terrorism.

The College seeks to protect students against the messages of all violent extremism including, but not restricted to, those linked to Islamist ideology, or to Far Right / Neo Nazi / White Supremacist ideology, Irish Nationalist and Loyalist paramilitary groups, and extremist Animal Rights movements.

College staff receive training to help identify early signs of radicalisation and extremism.

Opportunities are provided in tutorials to enable Students to discuss issues of religion, ethnicity and culture.

The College governors, the Principal and the Designated Safeguarding Lead (DSL) will assess the level of risk within the College and put actions in place to reduce that risk. Risk assessment may include, [due diligence checks for external speakers and private hire of facilities](#)

When any member of staff has concerns that a pupil may be at risk of radicalisation or involvement in terrorism, they should speak with the DSL in the first instance.

The DSL or DDSL should then follow the safeguarding procedures and refer cases by following the [Prevent referral process](#) and use the Prevent referral form. If the matter is urgent then Police must be contacted by dialling 999. In cases where further advice from the

Police is sought dial 101 or 01483 632982 and ask to speak to the Prevent Supervisor for Surrey.

The Department for Education has also set up a dedicated telephone helpline for staff and governors to raise concerns around Prevent (020 7340 7264).

Indicators of vulnerability to radicalisation

Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism leading to terrorism.

Extremism is defined by the Crown Prosecution Service as:

- The demonstration of unacceptable behaviour by using any means or medium to express views which:
- Encourage, justify or glorify terrorist violence in furtherance of particular beliefs;
- Seek to provoke others to terrorist acts;
- Encourage other serious criminal activity or seek to provoke others to serious criminal acts; or
- Foster hatred which might lead to inter-community violence in the UK.

There is no such thing as a “typical extremist”: those who become involved in extremist actions come from a range of backgrounds and experiences, and most individuals, even those who hold radical views, do not become involved in violent extremist activity.

Students may become susceptible to radicalisation through a range of social, personal and environmental factors - it is known that violent extremists exploit vulnerabilities in individuals to drive a wedge between them and their families and communities. It is vital that College staff are able to recognise those vulnerabilities.

Indicators of vulnerability include:

- Identity Crisis – the student is distanced from their cultural / religious heritage and experiences discomfort about their place in society;
- Personal Crisis – the student may be experiencing family tensions; a sense of isolation; and low self-esteem; they may have dissociated from their existing friendship group and become involved with a new and different group of friends; they may be searching for answers to questions about identity, faith and belonging;
- Personal Circumstances – migration; local community tensions; and events affecting the student’s country or region of origin may contribute to a sense of grievance that is triggered by personal experience of racism or discrimination or aspects of Government policy;
- Unmet Aspirations – the student may have perceptions of injustice or a feeling of failure,
- Experiences of Criminality – which may include involvement with criminal groups, imprisonment, and poor resettlement / reintegration;

- Special Educational Needs and Disability – students may experience difficulties with social interaction, empathy with others, understanding the consequences of their actions and awareness of the motivations of others.

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

More critical risk factors in all of the above could include:

- Being in contact with extremist recruiters;
- Accessing violent extremist websites, especially those with a social networking element;
- Possessing or accessing violent extremist literature;
- Using extremist narratives and a global ideology to explain personal disadvantage;
- Justifying the use of violence to solve societal issues;
- Joining or seeking to join extremist organisations;
- Significant changes to appearance and / or behaviour;
- Experiencing a high level of social isolation resulting in issues of identity crisis and / or personal crisis.

The Department of Education guidance [The Prevent Duty](#) can be accessed via this link.

Appendix 4 - Female Genital Mutilation (FGM), Forced Marriages & Honour based Abuse

Female Genital Mutilation

Female Genital Mutilation (FGM) is illegal in England and Wales under the FGM Act (2003). It is a form of child abuse and violence against women. [A mandatory reporting duty requires teachers to report 'known' cases of FGM in under 18s](#), which are identified in the course of their professional work, to the police.

The duty applies to all persons in College who are employed or engaged to carry out 'teaching work' in the College.

The duty applies to the individual who becomes aware of the case to make a report. It should not be transferred to the Designated Safeguarding Lead, however the DSL in their absence the DDSL, should be informed first and will support you to complete the report.

If a lecturer is informed by a girl under 18 that an act of FGM has been carried out on her or a lecturer observes physical signs which appear to show that an act of FGM has been carried out on a girl under 18 and they have no reason to believe the act was necessary for the girl's physical or mental health or for purposes connected with labour or birth, the lecturer should personally make a report to the police force in which the girl resides by calling 101. The report should be made immediately. The DSL or DDSL will support you to do this.

College staff are trained to be aware of risk indicators of FGM.

Concerns about FGM outside of the mandatory reporting duty should be reported using the Colleges safeguarding procedures. Staff should be particularly alert to suspicions or concerns expressed by female pupils about going on a long holiday during the summer holiday.

There should also be consideration of potential risk to other girls in the family and the wider community. Where there is a risk to life or likelihood of serious immediate harm the lecturer should report the case immediately to the police, including dialling 999 if appropriate. The DSL will support you to do this.

There are no circumstances in which a lecturer or other members of staff should examine a girl.

Forced Marriages

A forced marriage is a marriage in which one or both people do not (or in cases of people with learning disabilities cannot) consent to the marriage but are coerced into it. Coercion may include physical, psychological, financial, sexual and emotional pressure. It may also involve physical or sexual violence and abuse.

Forced marriage is recognised in the UK as a form of violence against women and men, domestic/child abuse and a serious abuse of human rights. Since June 2014 forcing someone to marry has become a criminal offence in England and Wales under the Anti-Social Behaviour, Crime and Policing Act 2014.

A forced marriage is not the same as an arranged marriage which is common in many cultures. The families of both spouses take a leading role in arranging the marriage but the choice of whether or not to accept the arrangement remains with the prospective spouses.

College staff should never attempt to intervene directly as a College or through a third party. The staff member should report their concern to the DSL or DDSL. Contact should be made with the C-SPA and/or the Forced Marriage Unit 200 7008 0151 by the DSL or DDSL

Honour-based Abuse

Honour based abuse (HBA) can be described as a collection of practices, which are used to control behaviour within families or other social groups to protect perceived cultural and religious beliefs and/or honour. Such violence can occur when perpetrators perceive that a relative has shamed the family and/or community by breaking their honour code.

Honour based abuse might be committed against people who:

- become involved with a boyfriend or girlfriend from a different culture or religion;
- want to get out of an arranged marriage; become involved with a boyfriend or girlfriend from a different culture or religion;
- want to get out of an arranged marriage;
- want to get out of a forced marriage

- wear clothes or take part in activities that might not be considered traditional within a particular culture
- It is considered a violation of human rights and may be a form of domestic and/or sexual abuse

One Chance Rule

All staff are aware of the 'One Chance' Rule' in relation to forced marriage, FGM and HBA. Staff recognise they may only have one chance to speak to a child who is a potential victim and have just one chance to save a life.

The College is aware that if the victim is not offered support following disclosure that the 'One Chance' opportunity may be lost. Therefore, all staff are aware of their responsibilities and obligations when they become aware of potential forced marriage, FGM and HBA cases.

Appendix 5 - Domestic Abuse

Domestic abuse represents one quarter of all violent crime. It is actual or threatened coercive control and 'gaslighting, economic abuse, online abuse, threats and intimidation, physical, emotional, psychological or sexual abuse. It involves the use of power and control by one person over another. It occurs regardless of race, ethnicity, gender, class, sexuality, age (16+), and religion, mental or physical ability. Domestic abuse can also involve other types of abuse.

We use the term domestic abuse to reflect that a number of abusive and controlling behaviours are involved beyond violence. Slapping, punching, kicking, bruising, rape, ridicule, constant criticism, threats, manipulation, sleep deprivation, social isolation, and other controlling behaviours all count as abuse.

Living in a home where domestic abuse takes place is harmful to students and can have a serious impact on their behaviour, wellbeing and understanding of healthy, positive relationships. Students who witness domestic abuse are at risk of significant harm and staff are alert to the signs and symptoms of a child suffering or witnessing domestic abuse.

What signs to look for

If you believe that you or someone else could be a victim of domestic abuse, there are signs that you can look out for including:

- being withdrawn, or being isolated from family and friends
- having bruises, burns or bite marks
- having finances controlled, or not being given enough to buy food or pay bills
- not being allowed to leave the house, or stopped from going to college or work
- having your internet or social media use monitored, or someone else reading your texts, emails or letters
- being repeatedly belittled, put down or told you are worthless
- being pressured into sex
- being told that abuse is your fault, or that you're overreacting

If someone confides in you, or If you are worried that someone you know is a victim of domestic abuse, you must Inform the Safeguarding Team and you can call Refuge's National Domestic Abuse Helpline for free, confidential support, 24 hours a day on 0808 2000 247. Visit the [helpline website](#) to access information on how to support someone.

If you believe there is an immediate risk of harm to someone, or it is an emergency, always call 999.

The College is enrolled onto the Operation Encompass scheme, a joint project between Surrey Police, Surrey Domestic Abuse Service and Surrey Schools/Colleges; where every College day morning our DSL is notified of all domestic abuse incidents that have occurred and been reported to Police in the previous 24 hours which involved a child at this College (72 hours on a Monday morning). This provides an opportunity for us to ensure the right support is in place at the right time for students who are experiencing domestic abuse.

Appendix 6 - Mental Health

Many students and staff members may feel uncertain and anxious at times and in particular during a National pandemic and whole country lockdown. . It is important to support positive mental health and wellbeing, which is necessary for students to engage in learning. We are able to identify students and members of staff who may need additional support and ensure they have appropriate mental health and wellbeing support in place. Vulnerable students are particularly likely to need additional support with their mental health and wellbeing.

Brooklands College works with local authorities and voluntary sector mental health organisations to ensure that support is in place. Local authorities can be contacted to see if they have a list of services in your area that provide support for young people/adults.

The college has a counselling service available to all students term time 9.30-4, which includes counselling sessions and a helpline. This is a self referral provision, information leaflets for staff and students and a self referral form can be found on the staff and student nets.

All staff will

- Be aware that mental health problems can, in some cases, be an indicator that a student has suffered or is at risk of suffering abuse, neglect or exploitation.
- Recognise where students have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences (ACE's), this can have a lasting impact throughout childhood, adolescence and into adulthood. Staff are aware of how these student's experiences can impact on their mental health, behaviour and education.
- Where a staff member has a mental health concern encourage the student to seek support from their GP and or the college counsellor
- Where a staff member has a mental health concern about a student that is also a safeguarding concern, immediate action will be taken, following our safeguarding policy and procedure and speaking to the Designated Safeguarding Lead or the Deputy designated Safeguarding Lead and or a Progression Mentor.

- Record their concerns via My Concern (**see point 8.0**) if they are worried or a student is being abused and report these to the DSL that day if at immediate risk. If the DSL is not contactable the Deputy DSL should be informed.

Other Resources Available

- [MindEd](#), which includes e-learning modules about young people's mental health
- The [Every Mind Matters](#) platform, which has specific advice for adults and young people on maintaining good mental wellbeing during the coronavirus (COVID-19) pandemic
- The Association of College's (AoC) [coronavirus](#) (COVID-19) resource hub, which includes advice for students and staff
- The Education and [Training Foundation's mental health and emotional wellbeing advice](#) for FE staff
- Education [Support's mental health and wellbeing support services for all education staff](#)
- Free apps available on the [NHS App Store](#) for mental health and wellbeing support.
- [Digital Wellbeing of Students guide from Jisc](#), which curates a number of resources and guides
- The [Samaritans' website](#) provides guidance on how to prepare for and respond to a suspected suicide in FE colleges
- Mental health is also covered in [keeping children safe in education](#) and these principles continue to apply.

Appendix 7 - Child Sexual Exploitation (CSE)

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. All staff are aware of the link between online safety and vulnerability to CSE.

Any concerns that a child is being or is at risk of being sexually exploited should be passed immediately to the DSL or DDSL.

The College is aware there is a clear link between regular non-attendance at College and CSE. Staff will consider a child to be at potential CSE risk in the case of regular non-attendance at College and make reasonable enquiries with the child and parents to assess this risk.

All staff are aware that safeguarding incidents and/or behaviours can be associated with factors outside the college and/or can occur between students outside of these

environments. All staff, but especially the Designated Safeguarding Lead (and Deputies) will consider whether students are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and students can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, and serious youth violence

The DSL or DDSL will consider the published Surrey Safeguarding Children Partnership guidance and advice when there is a concern that a child is being or is at risk of being sexually exploited or where indicators have been observed that are consistent with a child who is being or who is at risk of being sexually exploited.

In all cases if the DSL or DDSL identifies any level of concern the DSL or DDSL should contact the C-SPA and email a Request for Support Form. If a child is in immediate danger the police should be called on 999.

The College is aware that often a child is not able to recognise the coercive nature of the abuse and does not see themselves as a victim. As a consequence, the child may resent what they perceive as interference by staff. However, staff must act on their concerns as they would for any other type of abuse. Students also rarely self-report CSE so staff must be particularly vigilant to potential indicators of risk.

The College includes the risks of sexual exploitation via tutorials. Students will be informed of the grooming process and how to protect themselves from people who may potentially be intent on causing harm. They will be supported in terms of recognising and assessing risk in relation to CSE, including online, and knowing how and where to get help.

Appendix 8 - Child Criminal Exploitation (CCE) & Gangs

Both CSE and CCE are forms of abuse and both occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal activity.

There are a number of areas in which young people are put at risk by gang activity, both through participation in, and as victims of, gang violence which can be in relation to their peers or to a gang-involved adult in their household.

A child who is affected by gang activity or serious youth violence may have suffered, or may be likely to suffer, significant harm through physical, sexual and emotional abuse or neglect.

Teenagers can be particularly vulnerable to recruitment into gangs and involvement in gang violence. This vulnerability may be exacerbated by risk factors in an individual's background, including violence in the family, involvement of siblings in gangs, poor educational attainment, or poverty or mental health problems.

Criminal exploitation of Children is a typical feature of county lines criminal activity. Key identifying features of involvement in county lines are when children are missing, when the victim may have been trafficked for transporting drugs, a referral to the National Referral

Mechanism should be considered with Social Care and Police colleagues. 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 forms of “deal line”.

A child who is affected by gang activity, criminal exploitation or serious youth violence can be at risk of significant harm through physical, sexual and emotional abuse. Girls may be particularly at risk of sexual exploitation.

Any concerns that a child is being or is at risk of being criminally exploited will be passed without delay to the DSL or DDSL. The College is aware there is a clear link between regular non-attendance at College and exploitation. Staff will consider a child to be at potential risk in the case of regular non-attendance at College and make reasonable enquiries with the child and parents to assess this risk.

A request for support to the C-SPA will be made when any concern of harm to a child as a consequence of gang activity including child criminal exploitation becomes known. Any member of staff who has concerns that a child may be at risk of harm should immediately inform the DSL. The DSL will contact the C-SPA. If there is concern about a child's immediate safety, the Police will be contacted on 999.

Appendix 9 - Online Safety

The College has an Online Safety Policy which explains how we try to keep students safe in College and how we respond to online safety incidents, this same policy is adhered to during remote learning.

Students increasingly use electronic equipment on a daily basis to access the internet, share and view content and images via social media sites such as Facebook, Twitter, Instagram, Snapchat and Voodoo and for online gaming.

Some adults and other children use these technologies to harm children. The harm might range from sending hurtful or abusive texts or emails, to grooming and enticing children to engage in extremist or sexual behaviour involving webcam photography or face-to-face meetings.

Students may also be distressed or harmed by accessing inappropriate material such as pornographic websites or those which promote extremist behaviour, criminal activity, suicide or eating disorders

Students are taught about online safety through the tutorial programme which include

- Online relationships
- Privacy and Security
- Online reputation
- Online bullying

The college will

- Provide students with laptop and wifi dongles (if required) during remote learning provision
- Ensure all laptops provided are secure
- Set clear expectations of students concerning their participation in remote education, so they know when and how they are expected to engage and demonstrate their learning
- Complete welfare checks at the start of each lesson to ensure that all students are engaged and supported
- Provided a safe, secure learning space for the most vulnerable students during a National Lockdown, ensuring they have access to appropriate IT equipment
- Ensure students know how to keep themselves safe online - Provide students with online safety awareness via tutorials
- Ensure students know who and where to go to for support i.e. IT issues, and or Safeguarding Concerns

The students will

- Follow the Online Safety Policy when accessing on campus and remote learning activities
- Not carry out any unauthorised interference with software or data belonging to or used by the college.
- Use their student email accounts appropriately. And will have read and understood the College Student Email 'Terms of Use' document (available on the Student Intranet)
- Ensure they participate in remote lessons, acknowledging the tutor when spoken to and turn their camera on at least once during the lesson
- Log onto the laptops provided, using their college usernames and passwords
- Ensure any laptop provided is returned to the college when requested in the original packaging and in good condition
- Report any hurtful or abusive texts or emails, grooming and enticing children to engage in extremist or sexual behaviour involving webcam photography or face-to-face meetings, distressed or harmed caused by accessing inappropriate material such as pornographic websites or those which promote extremist behaviour, criminal activity, suicide or eating disorders to their tutor, Progression Mentor or a member of the Safeguarding Team

Appendix 10 - Youth produced sexual imagery (sexting)

The practice of children sharing images and videos via text message, email, social media or mobile messaging apps has become commonplace. However, this online technology has also given children the opportunity to produce and distribute sexual imagery in the form of photos and videos. Such imagery involving anyone under the age of 18 is unlawful.

Youth produced sexual imagery refers to both images and videos where:

- A person under the age of 18 creates and shares sexual imagery of themselves with a peer under the age of 18.
- A person under the age of 18 shares sexual imagery created by another person under the age of 18 with a peer under the age of 18 or an adult.
- A person under the age of 18 is in possession of sexual imagery created by another person under the age of 18.

All incidents of this nature should be treated as a safeguarding concern and in line with the UKCCIS guidance '[Sexting in schools and colleges: responding to incidents and safeguarding young people](#)'

Cases where sexual imagery of people under 18 has been shared by adults and where sexual imagery of a person of any age has been shared by an adult to a child is child sexual abuse and should be responded to.

If a member of staff becomes aware of an incident involving youth produced sexual imagery they should follow the Safeguarding procedures and refer to the DSL or DDSL immediately.

The member of staff should not advise the student to delete the sexual imagery but to request DSL or DDSL involvement immediately. Staff must not view, copy or print the youth produced sexual imagery.

The DSL or DDSL should hold an initial review meeting with appropriate College staff and subsequent interviews with the students involved (if appropriate).

Parents should be informed at an early stage and involved in the process unless there is reason to believe that involving parents would put the child at risk of harm.

At any point in the process if there is concern a child has been harmed or is at risk of harm a request for support should be made to the C-SPA or the Police as appropriate.

Immediate request for support at the initial review stage should be made to Children's Social Care/Police if:

- The incident involves an adult.
- There is good reason to believe that a young person has been coerced, blackmailed or groomed or if there are concerns about their capacity to consent (for example, owing to special education needs).
- What you know about the imagery suggests the content depicts sexual acts which are unusual for the child's development stage or are violent.
- The imagery involves sexual acts.
- The imagery involves anyone aged 12 or under.
- There is reason to believe a child is at immediate risk of harm owing to the sharing of the imagery, for example the child is presenting as suicidal or self-harming.

If none of the above apply, then the DSL or DDSL will use their professional judgement to assess the risk to students involved and may decide to respond to the incident without referral to the C-SPA or the Police.

During the decision making the DSL or DDSL will consider if:

- There is a significant age difference between the sender/receiver.
- There is any coercion or encouragement beyond the sender/receiver.
- The imagery was shared and received with the knowledge of the child in the imagery.
- The student is vulnerable, for example subject to Child in Need, Child Protection or Early Help plans, Looked After, SEND.
- There is a significant impact on the students involved.
- The image is of a severe or extreme nature.
- The student involved understands consent.
- The situation is isolated or if the image has been more widely distributed.
- There other circumstances relating to either the sender or recipient that may add cause for concern.
- The students have been involved in incidents relating to youth produced sexual imagery previously.

If any of these circumstances are present the situation will be referred according to our child protection procedures, including referral to the C-SPA or the Police.

The DSL or DDSL will record all incidents of youth produced sexual imagery, including the actions taken, rationale for actions and the outcome.

Appendix 11 - Children Missing Education

All children, regardless of their circumstances, are entitled to an efficient, full time education which is suitable to their age, ability, aptitude and any special educational needs they may have.

The College recognises that children missing education, can be a vital warning sign of a range of safeguarding possibilities. They are also at significant risk of underachieving, being victims of abuse and harm, exploitation or radicalisation, and becoming NEET (not in education, employment or training).

Where possible the College will hold more than one emergency contact number for each student.

When removing a child's (14-16), the College will notify the child's school (if they remain on role) and or the Local Authority of: (a) the full name- of the child, (b) the full name and address of any parent with whom the child normally resides, (c) at least one telephone number of the parent, (d) the child's future address and destination school/college, if applicable.

Appendix 12 - Looked After Child (LAC) & Fostering Arrangements

Looked After Child (LAC)

The most common reason for children becoming looked after is as a result of abuse and neglect.

The College ensures that staff have the necessary skills and understanding to keep looked after children safe.

The DSL and DDSL who manage children looked after will have the appropriate level training to equip them with the knowledge and skills to undertake their role.

The DSL, DDSL Progression Mentor (PM) will have details of the child's social worker and the name and contact details of the Surrey County Council's Head of Virtual School.

The Progression Mentor of children looked after within their areas will work in partnership with the Virtual School Assistant Headteacher to support and meet the needs of the child within their personal education plan (PEP). They will ensure the PEPs are reviewed each term for all LAC children.

Private Fostering Arrangements

A [private fostering](#) arrangement occurs when someone other than a parent or close relative cares for a child for a period of 28 days or more, with the agreement of the child's parents. It applies to students under the age of 16 years old or 18 years old if the child is disabled.

Students looked after by the local authority or who are placed in residential schools, children's homes or hospitals are not considered to be privately fostered. Private fostering occurs in all cultures and children may be privately fostered at any age. The College recognises that most privately fostered children remain safe and well but are aware that safeguarding concerns have been raised in some cases.

Appendix 13 - Further Advice on Safeguarding and Child Protection

Surrey County Council Education Safeguarding Team

NSPCC: <http://www.nspcc.org.uk/>

ChildLine: <http://www.childline.org.uk/pages/home.aspx>

CEOP Thinkuknow: <https://www.thinkuknow.co.uk/>

Anti Bullying Alliance: <http://anti-bullyingalliance.org.uk/>

Childnet International –making the internet a great and safe place for children. Includes resources for professionals and parents <http://www.childnet.com/>

Safer Internet Centre <http://www.saferinternet.org.uk/>

Contextual Safeguarding Network <https://www.contextualsafeguarding.org.uk/>