



# **Safeguarding (Child Protection and Vulnerable Adults)**

## **Policy and Procedures (Including the Prevent Duty)**

**2024/25  
Academic Year**

<b>Policy</b>	Safeguarding (Child Protection and Vulnerable Adults)
<b>Issued</b>	March 2025v2
<b>Next Review</b>	September 2025
<b>Responsibility</b>	Designated Safeguarding Lead

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## 1. Designated Staff Responsible for Safeguarding

Nominated Governor for Safeguarding

John Tew

Senior Management Team Member with  
Leadership Responsibility for Safeguarding:

Emma Brannen

### **Dedicated full time Safeguarding Staff:**

Designated Safeguarding Lead (DSL),  
Sandwell Family of Colleges:

Paul Smith

Deputy Safeguarding Lead (Central/CSM):  
Safeguarding Officer (Central/CSM):  
Safeguarding Officer (Central/CSM):  
Safeguarding Officer (Central/CSM):

Kirsty Wealthall  
Omar Farooq  
Lucy Jones  
Simran Gill

Safeguarding Officer (Vacancy):  
Safeguarding Officer SEN (Vacancy):

Deputy Safeguarding Lead (Cadbury):  
Safeguarding Officer (Cadbury):  
Safeguarding Officer (Cadbury):

James Blunt  
Hafsha Shamim  
Lyn James

### **Central Campus and Central St Michaels**

The college has five dedicated full-time staff responsible for Central Campus, Central Saint Michaels, Bond Wolfe, Terry Duffy House and the Engineering centre in West Bromwich, in addition to the Birmingham City centre location (Bennetts Hill). The office location for Safeguarding at Central Campus is rooms UG18 and UG21. These dedicated areas operate an open-door policy with access to the team in a confidential and safe setting.

**Normal working hour's information during term time – Monday – Thursday  
8:30am - 5.00pm and Fridays 8.30am – 3:30 pm**

Campus	Central Emergency Location	Name and Responsibility	Contact Details
Central Campus	Safeguarding Room (UG21)	Paul Smith, Designated Safeguarding Lead	Internal: 528890 External: 0121 667 5213
		Kirsty Wealthall, Deputy Designated Safeguarding Lead	Internal: 536285 External: 0121 667 5101
		Omar Farooq Safeguarding Officer	Internal: 444603 External: 0121 667 5101
		Lucy Jones Safeguarding Officer	Internal: 709587 External: 0121 667 5101
		Simran Gill Safeguarding Officer	Internal: 720160 External: 0121 667 5101

## **Cadbury College**

Cadbury college have three dedicated full time Safeguarding staff.

Safeguarding staff are located next to the Student Hub near to the student entrance to the college.

These dedicated areas operate an open-door policy with access to the team in a confidential and safe setting.

	<b>Central Emergency Location</b>	<b>Name and Responsibility</b>	<b>Contact Details</b>
Cadbury College	Safeguarding Office, Student Hub	James Blunt, Deputy Designated Safeguarding Lead	Internal: 683994 External: 0121 415 7244
		Hafsha Shamim Safeguarding Officer	Internal: 671735 External: 0121 415 7244
		Lyn James Safeguarding Officer	Internal: 657730 External: 0121 415 7244

The college have a wider safeguarding team of staff who undertake other roles in the college including teaching and support but are recognised for their crucial contribution to safeguarding our students. The display boards within college campuses provide information on these members of staff.

The Foundation Studies curriculum area at Central Campus have their own dedicated Safeguarding staff who offer specialist support to their students, many of which have special educational needs, disabilities or health issues.

## **Contacting Safeguarding Staff**

**A member of Safeguarding staff needs to be contacted without delay for serious and urgent concerns.**

**Dial 0 (Switchboard) and ask to be connected to Safeguarding.**

**ALWAYS attempt to speak to a member of Safeguarding staff in person about a concern.**

**Do NOT use email to report concerns, speak to Safeguarding staff directly and submit an incident report using CPOMS to provide written information and for follow up actions ([sandwell.cpoms.net](https://sandwell.cpoms.net))**

**ALWAYS follow up a concern if you have not had a reply.**

## 2. Purpose of the Safeguarding Policy

The college is committed to safeguarding and promoting the wellbeing of its students.

The college recognise that it is the responsibility of **all** staff to ensure that all students are safe and feel safe in the college environment. Colleges are an important part of the wider safeguarding system for children.

The Education Act 2002, Section 175 and the Apprenticeships, Skills, Children and Learning Act 2009 (as amended) requires local education authorities and the governors of further education (FE) colleges to ensure that their functions are carried out with a view to safeguarding and promoting the welfare of children.

Children include everyone under the age of 18.

Safeguarding and promoting the welfare of children is defined (as per the statutory guidance, Keeping Children Safe in Education) and for the purposes of this guidance as:

- Providing help and support to meet the needs of children as soon as problems emerge;
- Protecting children from maltreatment, whether that is within or outside the home, including online;
- Preventing the impairment of children's mental and physical health or development;
- Ensuring that children grow up in circumstances consistent with the provisions of safe and effective care;
- Taking action to enable all children to have the best outcomes.

### Intended impact

The intended impact for the college in terms of Safeguarding is set out below:

- To enable all children to feel safe and cared for whilst at our college, and to ensure that they have a safe place to live and safe people to whom they can turn to.
- To ensure that the cohort of children who are safeguarded reach their potential in terms of academic progress and attainment.
- To enable that access to safe people is well promoted, easily understood and assessable for children to report abuse, knowing that their concerns will be treated seriously, and they can safely express their concerns and give feedback.
- To enable all adults involved with our college to be fully equipped to fulfil their responsibilities in effectively promoting the safeguarding and welfare of all of our children.

## **Safeguarding and promoting the welfare of children is everyone's responsibility**

Everyone who comes into contact with children, vulnerable adults and their families has a role to play in safeguarding young people, vulnerable adults and our learning and working community. Members of staff are particularly important as they are in a position to identify concerns early, to provide support and to prevent concerns from escalating and becoming a serious case.

All staff, including those who do not work directly with children have an important role in protecting children.

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

The College recognises and embraces that it forms part of a wider safeguarding framework and system. This framework and system is outlined in fuller detail in the statutory guidance 'Working Together to Safeguard Children' (2023).

This policy encompasses all aspects of child protection and safeguarding including e-safety, bullying and harassment (in person or electronically) and due regard to the prevention of young people becoming extremist in their views and or actions, or being radicalised. This policy should be read in conjunction with the relevant statutory guidance 'Keeping Children Safe in Education'.

The College recognises a number of associated policies, procedures and other documents relating to safeguarding. This policy should be read in conjunction with those as listed below:

### **Relevant Policies:**

- Anti-Bullying and Harassment Policy
- Criminal Convictions Policy
- Fitness to Study Policy
- Fundamental British Values Policy
- Managing Events and Outside Speakers Policy
- Photography Policy
- Safeguarding Professional Boundaries Policy
- Self-Harm and Suicidal Behaviour Prevention Policy
- Students at Risk Policy
- Substance Misuse Policy
- Transgender Policy
- Visitor Policy

### **Relevant Procedures:**

- Procedure for reporting and dealing with Allegations of Abuse against Members of Staff and Adults in a position of Trust.
- Dealing with a Death of Student in Learning Procedure.
- Guidance for taking Statements.

Please note that all the above policies and procedures are accessible via the Library within CPOMS.

## **Safeguarding and promoting the welfare of vulnerable adults**

An adult in a vulnerable situation is defined as person aged 18 or over, who is or may need community care services by reason of mental health or other disability, age or illness or other personal characteristics or circumstances; and who is or may be unable to take care of him or herself, or unable to protect him or herself against significant harm or exploitation.

Safeguarding for adults is defined by the Care Act (2014).

Where a student aged 18 years or above divulges information or staff become concerned that the young person is at risk of harm, the member of staff must make a safeguarding referral via CPOMS.

The student will be made aware of services within the college which may be able to help them address the situation and offer support.

The adult has a right to make their own decisions if they are competent to do so in line with the Mental Capacity Act 2005. If their competency is in doubt, further advice will be sought by the Safeguarding Team to the relevant local authority Adult Social Care department.

## **3. Statutory Framework**

In order to safeguard and promote the welfare of children, the college will act in accordance with the following legislation and guidance:

**The Education Act 2002**, (section 175/157) requires local education authorities and the governors of maintained schools and further education (FE) colleges to make arrangements to ensure that their functions are carried out with a view to safeguarding and promoting the welfare of children.

Education and Training (Welfare of Children) Act 2021 amends the Education Act 2002 and the Apprenticeships, Skills, Children and Learning Act 2009 to impose safeguarding duties on 16 to 19 academies and further education in essence ensuring that safeguarding responsibilities are understood and prohibiting funding being given if safeguarding requirements not complied with.

### **The Childrens Act 2004**

**Sandwell Children's Safeguarding Partnership - Inter Agency Procedures** – West Midlands regional Procedures

**Working Together to Safeguard Children (2023)** - requires education institutions to follow the procedures for protecting children from abuse which are defined by Sandwell Multi Agency Safeguarding Arrangements and have appropriate procedures in place

for responding to all concerns of actual or suspected abuse including allegations against members of staff in a position of trust. The best way to safeguard a child is through effective early help and prevention so it is important to carry out effective early help assessment and take on the role of the Lead Professional. Sandwell's multi-agency Threshold Document explains early help and expectations more in depth.

**Keeping Children Safe in Education** – outlines the statutory duties on all schools and colleges.

**Sexual Offences Act 2003:**

**Section 26 of the Counter-Terrorism and Security Act (2015)**

**The Prevent Duty** – The college is subject to a duty under section 26 of the Counter-Terrorism and Security Act 2015, in the exercise of their functions, to have “due regard to the need to prevent people from being drawn into terrorism”.

**Section 5B of the Female Genital Mutilation Act 2003** - (as inserted by section 74 of the Serious Crime Act 2015) places a statutory duty upon **teachers, along with social workers and healthcare professionals, to report to the police** where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Those failing to report such cases will face disciplinary sanctions. From October 2015, there is a 'mandatory reporting duty' for all education providers.

**Forced Marriage (Civil Protection) Act 2007 ([legislation.gov.uk](http://legislation.gov.uk))** – The legal age of marriage in England and Wales is 18 years old.

## 4. Early Help

All staff should be prepared to identify children who may benefit from early help.

Early help means providing support as soon as a problem emerges at any point in a child's life.

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;
- 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 education, home or care;
- Has experienced multiple suspensions, is at risk of being permanently excluded from schools, colleges and in Alternative Provision or a Pupil Referral Unit.
- is at risk of modern slavery, trafficking, sexual and/or criminal exploitation;



- is at risk of being radicalised or exploited;
- has a parent or carer in custody, 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;
- is at risk of 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage;
- is a privately fostered child;

## 5. Key Roles and Responsibilities

### The Role of the Governing Body

The governing body is committed to ensuring that the College:

- Provides a safe environment for young people, vulnerable adults and all within our learning community.
- Identifies young people and vulnerable adults who are suffering, or likely to suffer, significant harm, and
- Takes appropriate action to see that young people and vulnerable adults are kept safe, both at home and at the College.
- Promotes an environment and culture in which every learner feels valued and able to communicate their wishes and feelings successfully.
- Should be aware of their obligations under the Human Rights Act 1998 and the Equality Act 2010 (including the Public Sector Equality Duty).
- Ensures that there is a designated safeguarding lead and college safeguarding team.
- All staff including governance receive safeguarding training which is regularly updated.

### Senior Staff with Designated Lead Responsibility

The college will ensure that all relevant procedures and recommendations set out by the local Children Trust(s) will be followed to:

- Ensure there is a designated member of the College SMT responsible for safeguarding. The member of the SMT is Emma Brannen, Vice Principal
- Ensure there is a designated senior member of staff for safeguarding who has received appropriate training and support for this role. The Designated Safeguarding Lead (DSL) is Paul Smith.
- Ensure there is a Deputy Designated Safeguarding Lead (DDSL), with clearly defined responsibilities who will provide support to the DSL. The Deputy Designated Safeguarding Leads are Kirsty Wealthall (Central Campus/CSM) and James Blunt (Cadbury).
- Ensure all members of staff know the names of Safeguarding staff.
- Ensure all members of staff understand their responsibilities in referring any concerns to Safeguarding.
- Ensure all staff receive training to the required level which is updated as required. Records of safeguarding training to be kept centrally by Human Resources.

- Ensure all relevant safeguarding procedures are kept up-to-date in line with legislation and local Children Trust recommendations.
- Develop effective links with relevant agencies and cooperate as required with requests.
- Safeguarding staff will attend safeguarding meetings and case conferences.
- Keep written records of reported safeguarding issues and ensure all records are kept securely.
- Provide a report on safeguarding to the Governing Body.

## **Other college roles involved in the prevention of abuse:**

### **Human Resources – Safer Recruitment**

The College pays full regard to 'Keeping Children Safe in Education'. Safer recruitment practice includes scrutinising applicants, verifying identity and academic or vocational qualifications, obtaining professional and character references, checking previous employment history and ensuring that a candidate has the health and physical capacity for the job.

Candidates are informed of the need to carry out enhanced criminal records checks (DBS checks) before posts can be confirmed. Where applications are rejected because of information that has been disclosed, applicants have the right to know and to challenge incorrect information.

We undertake criminal record checks (DBS) for all staff and volunteers, to ensure that no disqualified person or unsuitable person works at the setting or has access to the children.

The College's recruitment procedures are reviewed regularly to ensure that they adhere to safer recruitment.

### **The Curriculum**

Safeguarding and the Prevent duty are covered and highlighted within the curriculum schemes of work. Relevant issues will be addressed and expanded upon through all areas of the curriculum via the tutorial programme and enhanced by the contribution from external speakers and/or productions.

### **Children Looked After (previously Looked After Children) Co-ordinator**

The college has a dedicated co-ordinator for looked after children and works with local authorities to promote the educational achievement of looked after children.

The most common reason for children becoming looked after is as a result of abuse and/or neglect. Staff should have the skills, knowledge and understanding to keep looked after children safe. Staff need information in relation to a looked after child's legal status (whether they are looked after under voluntary arrangements or with the consent of parents or on an interim or full care order) and contact arrangements with birth parents or those with parental responsibility. Information should be available on care arrangements and the level of authority delegated to the carer by the authority looking after the child.

A previously looked after child potentially remains vulnerable and all staff should have the skills, knowledge and understanding to keep previously looked after children safe. It is important that all agencies work together and that prompt action is taken.

## **6. Safeguarding Ethos**

The College recognises the importance of students feeling safe, and feel they are in an environment to disclose abuse. The college will endeavour to support students by:

- Ensuring that we have a whole college approach to safeguarding.
- Ensuring the content of the curriculum, particularly tutorials include relevant information and content.
- Providing a positive secure environment where students feel valued and supported.
- Implementing a code of conduct to which students sign up.

All of our learners, including children, young people and vulnerable adults, regardless of age, disability, gender, racial heritage, religious belief and sexual orientation or identity have the right to protection from harassment, harm or abuse.

All staff should be aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. For example, children may feel embarrassed, humiliated, or being threatened. This could be due to their vulnerability, disability and/or sexual orientation or language barriers. This should not prevent staff from having a professional curiosity and speaking to Safeguarding

### **Safe Working Practices**

The College has developed procedures for Codes of Practice for staff to understand and agree in relation to professional conduct with students.

All staff have access, to the “Safeguarding Professional Boundaries Policy”.

## **7. Safeguarding Culture – ‘Safeguarding is everyone’s responsibility’**

**All** members of the College community, including staff paid and unpaid, college governors, learners, sub-contracted and franchised staff, volunteers and visitors are responsible and have a collective responsibility for safeguarding and in promoting the welfare of young people and vulnerable adults. All of these groups within our college community will be made aware of the College Safeguarding policy. We are committed to create a 'culture of safety' in which all learners and members of our college community are protected from abuse and harm in all areas of its service delivery.

Responsibility for protection of our learners, including young people and vulnerable adults must be shared because people are safeguarded only when all relevant agencies and individuals accept responsibility, work with and co-operate with one another. The learning environment will be one in which our learners feel safe, secure,

listened to, valued and respected, and are actively encouraged and supported through the curriculum offer, support, work experience, placement and training areas to raise and report on any concerns they have about their own safety and welfare. Children who are abused or at risk of abuse will be supported within college.

Disclosures regarding any incidents relating to abuse or neglect and allegations against persons in a position of trust made by young people or vulnerable adults must always be taken seriously and reported swiftly in line with the College procedures, and with due regard to the privacy of the child, young person or vulnerable adult and their family.

Safeguarding Children Procedures provide a clear robust framework for swiftly raising concerns or reporting an incident or case relating to an individual or group. All procedures should be read and understood by all the College community. All staff will understand that in 'exceptional circumstances' they may report concerns directly to the relevant Children Services.

The College will support staff by providing an opportunity to talk through their anxieties and concerns with the Designated Members of Staff for safeguarding including where they have been directly involved in a safeguarding or Prevent incident/case and need reassurance, advice and help.

## **8. Online Safety**

It is essential that children are safeguarded from potentially harmful and inappropriate online material.

The College has dedicated policies to keep students safe online including;

- E-Safety Policy
- Acceptable use policy
- Social Media use policy

The College adheres to the digital and technology (filtering and monitoring) standards published by the Department for Education and is informed in part, by the requirements of the Prevent duty. These systems block harmful and inappropriate content without unreasonably impacting teaching and learning.

These standards are to protect our users online and especially children from accessing and sharing of indecent images consensually and non-consensually (often via large chat rooms). In addition to viewing and sharing pornography and other harmful content images.

The College will ensure that online safety is included in lessons and students are taught about safeguarding, including online, through teaching and learning opportunities, as part of a broad and balanced curriculum. This may include covering relevant issues through tutorials.

## **9. Confidentiality, communication, record keeping and information sharing**

Information sharing is vital in identifying and tackling all forms of abuse. The Data Protection Act 2018 and the General Data Protection Regulations (UK GDPR) places duties on organisations and individuals to process personal information fairly and lawfully and to keep the information they hold safe and secure; this is not a barrier to sharing information where the failure to do so would result in a child being placed at risk of harm.

Keeping Children Safe in Education makes it clear that fears about sharing information **cannot** be allowed to stand in the way of the need to promote the welfare and protect the safety of children; “No single professional can have a full picture of a child’s needs – **everyone** who comes into contact with them has a role to play in identifying concerns, sharing information and taking prompt action”. This includes allowing practitioners to share information without consent.

Safeguarding will keep all child protection records confidential, allowing disclosure only to those who need the information in order to safeguard and promote the welfare of children. A record will be made of who has viewed a child’s record, when and for what reason this will be recorded on the child’s chronology.

Safeguarding will cooperate with police and children’s social care to ensure that all relevant information is shared for the purposes of child protection investigations under section 47 of the Children Act 1989 in accordance with the requirements of Working Together to Safeguard Children (2023), the Prevent Duty Guidance for England and Wales (2015) and Channel Duty Guidance: Protecting vulnerable people from being drawn into terrorism (2015).

Keeping Children Safe in Education emphasises that **any** member of staff can contact children’s social care if they are concerned about a young person.

## 10. Procedure for Managing a Disclosure

All staff working within education are advised to maintain an attitude of ‘**it could happen here**’ where safeguarding is concerned.

When concerned about the welfare of a child, staff should always act in the **best** interests of the child. If staff have **any concerns** about a child’s welfare, they should act on them **immediately**.

Staff should not assume a colleague or another professional will act and share information that might be critical in keeping children safe.

### STEP 1 – If a young person tells you about possible abuse you must:

- a) Listen carefully, stay calm and reassure the student that you are pleased they have come to talk to you about the situation.
- b) Communicate that s/he has a right to be safe and protected.
- c) Advise the student that you will help them but you will have to pass the information on to other people in order to do so. Explain who this will be - Safeguarding staff.

- d) Ask questions normally and without pressure in order to be sure that you understand what the young person is telling you. Do not ask leading questions and do not make any comments about the alleged offender.
- e) Record the date, time and place of your conversation with the student.
- f) Note carefully what the student has disclosed to you, the questions you may have asked the student and the key points of the response from the student.
- g) Reassure the young person that by telling you, they have done the right thing.

## **STEP 2:**

- h) Take the student to Safeguarding immediately, where possible. **You must not deal with this issue by yourself or in isolation!**

## **STEP 3:**

- i) As soon as you can, transfer your record of the whole conversation you have had with the student to Safeguarding via the Incident Form on CPOMS. It is essential to record all you have heard but please do not add any opinions or interpretations. If you are not able to CPOMS, please contact Safeguarding in person.

## **STEP 4:**

- j) Safeguarding staff will look at the information they have been given by the member of staff reporting the issue. If the concerns about the student are significant and meet the additional needs/complex need criteria, they will be referred to the Multi-Agency Safeguarding Hub (MASH) so that a strategic overview can be maintained and any themes or common factors can be recognised. This includes concerns about a student who is affected by the behaviour of a parent or other adult in their household.

**Clear indications or disclosure of abuse will be reported without delay by Safeguarding staff.**

We recognise the stressful and traumatic nature of safeguarding and child protection work. We will support staff by providing an opportunity to talk through their anxieties with the Designated Safeguarding Lead and/or a deputy and to seek further support as appropriate.

We will endeavour to discuss our concerns with parents and carers and seek their consent to refer concerns unless we feel that to do so would place a child at risk of, or cause further significant harm.

In all other circumstances, the parents must be informed at the earliest opportunity, except where the decision has been taken to involve the Police and/or Children's Social Care, in which case this should not happen before the Strategy Discussion/Meeting has taken place.

If a child does not want their family informed, then seek advice from a member of the Safeguarding team/Social Services/Police.

Clear guidelines and procedures for Safeguarding and Prevent are displayed across the College, in our publications, including the Learner Handbook (available electronically on the college Mobile App), and on the College VLE.

Telephone referrals to the relevant service for children/young people and adult social care for those over 18 years of age will be followed up in writing using the relevant form within 24 hours.

Written records of any concern regarding a young person's/ vulnerable adult's safety will be kept centrally in a file in a locked cabinet.

Sandwell College recognises that we do not have the responsibility to investigate cases of suspected abuse.

Sandwell College will co-operate with and share information with relevant external agencies in any enquiries regarding safeguarding and Prevent Duty matters, including representation at case conferences, core groups and multi-agency planning meetings as required. We will seek consent to share information from the parent or carer unless to do so would place a young person or vulnerable adult at risk of, or cause further significant harm or would compromise the Safeguarding process.

All staff will make it clear to any young person or vulnerable adult disclosing information that they cannot guarantee confidentiality, but they will only pass the information on to the people that can help them.

Information concerning young people and vulnerable adults at risk will be shared with all members of staff on a "need to know" basis. A Designated Member of Staff for Safeguarding will make a judgement in each individual case about who needs and has a right to access particular information.

Where there are concerns about a young person or vulnerable adult, a member of staff may be asked to keep a log of observations. This will be kept securely and transferred to the Vice Principal with responsibility for Safeguarding and adherence to the Prevent Duty.

All Safeguarding and Prevent Duty records are subject to the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR). If there is any doubt as to the rights of any party to access information, we may seek legal advice prior to releasing any information.

## **11. Allegations against staff and adults in a Position of Trust**

All adults working with young people and vulnerable adults are considered to be in a position of trust, as a consequence of their knowledge, position and/or the authority invested in their role. This equally applies to volunteers.

This means that adults should **not**:

- Use their position to gain access to information for their own or other's advantage.

- Use their position to intimidate, bully, humiliate, threaten, coerce or undermine young people / vulnerable adults
- Use their status and standing to form or promote relationships which are of a sexual nature or may become so.

This means that adults should:

- Ensure that an unequal balance of power is not used for personal advantage or gratification.
- Maintain appropriate professional boundaries and avoid behaviour which may be misinterpreted by others.
- Report or record any incident where their behaviour may be misinterpreted with a Senior Manager at the earliest opportunity.

All adults have a responsibility to maintain public confidence in their ability to safeguard the welfare and best interests of young people and vulnerable adults with whom they work or come into contact with. It is therefore expected that they will adopt high standards of personal conduct in order to maintain the confidence and respect of the general public and with their colleagues.

There may be times, for example, when an adult's behaviour or actions in their personal life come under scrutiny from local communities, the media or public authorities. This could be because their behaviour is considered to compromise their position in the workplace or indicate an unsuitability to work with young people or vulnerable adults. Misuse of drugs, alcohol or acts of violence would be examples of such behaviour. The behaviour of an adult's partner or other family members may raise similar concerns and require careful consideration by the College as to whether there may be a potential risk to young people and vulnerable adults within the workplace.

This means that adults should not:

- Behave in a manner which would lead any reasonable person to question their suitability to work with children or act as a role model, or;
- Make or encourage others to make unprofessional comments which scapegoat, demean or humiliate.

This means that adults should:

- Be aware that behaviour in their personal lives may impact upon their work with young people and vulnerable adults.
- Follow codes of conduct and adopt positive behaviours as deemed appropriate by the College.
- Understand that behaviours and actions of their partner (or other family members) may raise questions about their suitability to work with young people and vulnerable adults.

All staff should be aware of their duty to raise concerns about the attitude or actions of colleagues.

**N.B. Guidelines set out within the College's Disciplinary Procedure and Procedure for Reporting and Dealing with Allegations of Abuse against Members of Staff and Adults in a Position of Trust, will be adhered to for internal and external investigation purposes.**



If a young person or vulnerable adult makes an allegation against a member of staff at the College the Designated Safeguarding Lead must be informed immediately, who will in turn inform the Human Resources Director.

If the Principal is implicated in the concerns you should discuss your concerns with the Local Authority Designated Officer for child protection (LADO) who will initiate appropriate action in the same manner as allegations made against other staff in school and inform the Safeguarding Designated Lead at the end of their enquiries.

If you have safeguarding/Prevent or child protection concerns relating to the parents/carers of children and you are aware that they work with children, young people or vulnerable adults, you must inform the designated staff for child protection. This will allow for consideration to be given as to whether the position of trust process needs to be applied

If an allegation of abuse is made against a member of staff in work-based provision not directly linked to college, it must be reported to the Police. The Designated Safeguarding Lead must be informed.

The member of staff should have no contact with the young person concerned and must not be informed of the allegation prior to referral.

Any individual (including volunteers, paid employees and those in work-based placements) who come into contact with young people and vulnerable adults have a legal and moral duty to safeguard and promote their welfare. This duty requires individual staff to ensure the safety of a young person or vulnerable adult involved in any activity or interaction for which that person is responsible.

The Children Act 2004, through the Stay Safe outcome places a duty upon organisations to promote the well being of young people. This includes the need to ensure that all adults who work with or on behalf of young people in these organisations are competent, confident and safe to do so.

The majority of adults who work with young people and vulnerable adults act professionally: Adults who work with young people and vulnerable adults are responsible for their own actions and behaviours and should avoid any contact which would lead any reasonable person to question their motives and intentions.

It is recognised that working with young people and vulnerable adults can result in tensions between adults and the learner concerned such that misunderstandings can occur, and it is here that the behaviour of adults can give rise to allegations of abuse being made against them. The college has a robust staff professional boundaries policy that provides guidance to ensure that staff are aware of their responsibilities when interacting with children, young people and vulnerable adults.

However, allegations may be genuine and research shows that there are adults who will deliberately seek out, create or exploit opportunities to abuse young people and vulnerable adults. It is therefore essential that all possible steps are taken to safeguard young people and vulnerable adults, and that adults working with them are safe to do so.

It is acknowledged that individuals may have concerns about the possibility of an allegation being made against them and for that reason it is important that they familiarise themselves with behaviours that may be considered as constituting gross misconduct and misconduct, and those which would be considered illegal.

Circumstances where misunderstanding may arise:

- Dress and appearance
- Personal living space
- Gifts, rewards and favouritism
- Communication with young people and vulnerable adults (including the use of technology)
- Social contact

Please note that the college has a dedicated **Safeguarding Professional Boundaries Policy**.

## 12. Physical Contact and Physical Intervention

Not all young people and vulnerable adults feel comfortable about physical contact. Adults should not assume that it is acceptable practice to use touch as a means of communication. Wherever possible, young people and vulnerable adults should be advised before physical contact or intervention is made.

It is recognised that some young people / vulnerable adults who have experienced abuse may seek inappropriate physical contact and adults should be particularly aware of this when it is known that a learner has suffered abuse.

In this circumstance careful consideration should be given to the needs of the learner. Details of the learner and his / her additional needs must be reported to the Vice Principal with responsibility for Safeguarding.

### Physical Intervention

The College's policy on the use of physical intervention is detailed within the Health and Safety policy. It applies strictly to the application of physical intervention in the case of persons with an identified learning disability or severe challenging behaviour and adheres to the Department of Health's Guidelines for the Use of Physical Intervention.

## 13. Learners Accessing Alternative Provision

Where learners are accessing the College as part of alternative school provision any Safeguarding/Prevent concerns must be reported to a member of the College's safeguarding team. This team will liaise closely with the Designated Officer from the young person's mainstream school, who will take the lead on the safeguarding case.

There are occasions when young people and vulnerable adults are placed in settings outside the College.

Young people and vulnerable adults are more vulnerable to abuse or harm in these situations than in short term placements, and therefore child protection arrangements

are a relevant concern for longer term placements. Additional safeguards will be necessary for placements when one or more of the following conditions apply. The placement is:

- for more than one day per week;
- for longer than one term in any academic year;
- aimed at those who may be vulnerable, e.g. those who have special needs or are young (aged under 16);
- one where the workplace supervisor or a colleague will have substantial unsupervised access to the child, because of the nature of the business (i.e. micro business or sole trader); or
- One which has a residential component.

All Learning Providers working with young people therefore have a duty of care to ensure Safeguarding policies and procedures are in place and followed by their employees and volunteers. To do this we will ensure that we:

- Create and maintain an environment in which young people and vulnerable adults feel secure, are encouraged to talk and are listened to.
- Include curriculum and enrichment activities and opportunities to enable learners the opportunity to attain skills and attitudes, to help them resist abuse in their own lives and to prepare for the responsibilities in their adult lives, including parenthood.
- Communicate a clear model of management of suspected or disclosed abuse.

## **14. Responsibilities for Safeguarding learners on Placement**

If any of the above conditions apply, the following safeguards should be in place at a strategic level:

- Sandwell College staff who arrange, vet, or monitor work placements will have had training in child protection;
- Training organisations or employers taking responsibility for a young person or a vulnerable adult on a long-term placement will be asked to make a commitment to safeguarding their welfare by endorsing an agreed Safeguarding policy or statement of principles.
- Any person whose normal duties will include regularly caring for, training, looking after or supervising a child in the workplace should be vetted and subject to DBS Disclosures to ensure s/he is not disqualified from working with children or otherwise unsuitable to be responsible for them. This should not include people who will have contact with the child simply because s/he will be in the same location, or as part of their work. It is intended to apply to people who are specifically designated to have responsibility for looking after, supervising or directly training a child or children throughout the placement.
- DBS Disclosures will be arranged by the College, and the person will be regarded as a volunteer for the purpose of the Disclosure.
- That person will also be given basic Safeguarding and Prevent Duty training to be aware of their responsibilities. They should be given details of a person to

contact in the event that there are any concerns about a learner for whom they are responsible.

- The learners who are placed in these settings will also be given clear advice about who to contact if they are worried or uncomfortable about their surroundings or if they suffer abuse. They will have a continuing point of regular contact within college and be given opportunities to raise any concerns they may have.
- If a concern is raised regarding a young person or vulnerable adult who is on a long-term placement, then the normal College Safeguarding and Prevent Duty procedures will apply.
- In some cases, it is also important to ensure that the learner concerned is suitable for the placement (for example, when placing young people in environments involving them working with younger children). In these circumstances DBS Disclosures may be required.

## 15. Preventative Work

As part of developing a healthy, safer lifestyle, young people and vulnerable learners will be taught:

- to recognise and manage risks in different situations and then decide how to behave appropriately (including those within the digital world)
- to judge what kind of physical contact is acceptable and unacceptable
- to recognise when pressure from others (including people they know) threatens their personal safety and develop effective ways of resisting pressure, including knowing where and when to get help
- to use assertiveness techniques to resist unhelpful pressure
- Our learners should feel valued, respected and able to discuss any concerns they have. The College will seek to create an environment where this can be achieved.

## 16. Types of Abuse, Neglect and Exploitation

All staff should be aware of indicators of abuse, neglect and exploitation in order to identify cases of children who may need help and protection.

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

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 cases will overlap with one another.

### Contextual Safeguarding

Contextual safeguarding refers to the wider importance of considering wider environmental factors in a child's life that may threaten their safety and/or welfare. It is important for everybody who works with children to be aware that safeguarding incidents and/or behaviours can be associated with factors outside the school or college and/or can occur between children. This can take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, serious youth violence and county lines. All staff, but especially the Designated Safeguarding Lead (or Deputy) should be considering the context within which such incidents and/or behaviours occur. Contextual Safeguarding is referred to in Working Together to Safeguard Children and Keeping Children Safe in Education.

## **Child Protection and Safeguarding Issues**

The statutory guidance 'Keeping children safe in education' provides guidance on a range of abuse or safeguarding issues including:

Abuse  
Belief in Spirit Possession Abuse  
Bullying (including Cyber)  
Child abduction and community safety incidents  
Children & the court system  
Children with family members in prison  
Children who are absent from education  
Child missing from education or care  
Children who are lesbian, gay, bisexual, or gender questioning  
Children missing from home  
Child criminal exploitation  
Child on Child abuse  
Child sexual exploitation  
County Lines  
Cybercrime  
Domestic Abuse  
Drug & substance misuse  
Fabricated or induced illness  
Female Genital Mutilation (FGM)  
Forced Marriage  
Gangs and youth violence  
Homelessness  
Mental Health and Mental Wellbeing  
Modern day slavery and human trafficking  
Preventing Radicalisation (the Prevent duty)  
Private Fostering  
Self-harming  
Sexual violence and sexual harassment  
Sexting  
So called 'honour-based' abuse  
Up Skirting  
Violence against Women and Girls

## Abuse

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

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

**Emotional abuse:** The persistent emotional maltreatment of a child such as to cause severe and 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 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, though it may occur alone.

**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 none 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 child on child abuse).

**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-giver); or ensure access to

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

The above statements and criteria also relate to vulnerable adults.

### **Belief in Spirit Possession Abuse**

Abuse linked to a Belief in Spirit Possession whereby the perpetrators believe that an evil spirit has entered a child and is controlling him or her. Sometimes the term 'witch' is used and is defined here as the belief that a child is able to use an evil force to harm others. Terms used may be black magic, kindoki, the evil eye, djinns, voodoo, obeah, demons, and child sorcerers. In all these cases genuine beliefs can be held by families, carers, religious leaders, congregations and the children themselves that evil forces are at work. Abuse often occurs when an attempt is made to 'exorcise' or 'deliver' the child.

### **Some of the following signs may be indicators of this type of abuse but may also be common features in other kind of abuse**

- Signs or marks such as bruises or burns.
- A child becoming noticeably confused, withdrawn, disorientated or isolated and appearing alone amongst other children.
- A person's personal care deteriorating such as losing weight, being unkempt with dirty clothes and even faeces smeared on them.
- Parent or carer does not show concern for or have a close bond with the child.
- Child's attendance becoming irregular or the child being taken out of education altogether.
- A child reporting, they are or have been accused of being 'evil' and/or that they are having the 'devil beaten out of them'.

### **Bullying (including Cyber)**

While bullying between children and young people is not a separate category of abuse and neglect, it is a very serious issue that can cause considerable anxiety and distress. At its most serious level, bullying can have a disastrous effect on a child's wellbeing and in very rare cases has been a feature in the suicide of some young people. Bullying someone because of their age, race, gender, sexual orientation disability and/or transgender will not be tolerated as the College operates a zero-tolerance approach. Bullying can take many forms including: -

- |                   |   |
|-------------------|---|
| <b>Emotional:</b> | <b>Being excluded, tormented (e.g. hiding things, threatening gestures)</b> |
| <b>Physical:</b>  | <b>Pushing kicking, punching or any use of aggression and intimidation.</b> |
| <b>Racial:</b>    | <b>Racial taunts, use of racial symbols, graffiti, gestures.</b>            |

<b>Sexual:</b>	<b>Unwanted physical contact, sexually abusive comments including homophobic comments and graffiti.</b>
<b>Verbal:</b>	<b>Name calling, spreading rumour's, teasing.</b>
<b>Cyber:</b>	<b>All areas on internet, such as email and internet, chat room misuse, mobile threats by text message and calls. Misuse of associated technology i.e. camera and video facilities, sexting.</b>

Please note that the college has a dedicated **Anti-Bullying and Harassment Policy**.

## **Child abduction and community safety incidents**

Child abduction is the unauthorised removal or retention of a minor from a parent or anyone with legal responsibility for the child. Child abduction can be committed by parents or other family members; by people known but not related to the victim (such as neighbours, friends and acquaintances); and by strangers.

Other community safety incidents in the vicinity of a school can raise concerns amongst children and parents, for example, people loitering nearby or unknown adults engaging children in conversation.

## **Children & the court system**

Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. There are two age-appropriate guides to support children via the Gov.UK website. The guides explain each step of the process and support and special measures that are available. There are diagrams illustrating the courtroom structure and the use of video links is explained.

Making child arrangements via the family courts following separation can be stressful and entrench conflict in families. This can be stressful for children. The Ministry of Justice has launched an online child arrangements information tool with clear and concise information on the dispute resolution service. This may be useful for some parents and carers.

## **Children with family members in prison**

Approximately 200,000 children have a parent sent to prison each year. These children are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. The National Information Centre on Children of Offenders (NICCO) provides information designed to support professionals working with offenders and their children, to help mitigate negative consequences for those children.

## **Children who are absent from Education**

Children being absent from education for prolonged periods and/or on repeat occasions can act as a vital warning sign to a range of safeguarding issues including neglect, child sexual and child criminal exploitation - particularly county lines.



It is important the school or college's response to persistently absent pupils and children missing education supports identifying such abuse, and in the case of absent pupils, helps prevent the risk of them becoming a child missing education in the future. This includes when problems are first emerging but also where children are already known to local authority children's social care and need a social worker (such as a child who is a child in need or who has a child protection plan, or is a looked after child), where being absent from education may increase known safeguarding risks within the family or in the community.

### **Child missing from Education or Care**

All staff should be aware that children going missing, particularly repeatedly can act as a vital warning sign of a range of safeguarding possibilities. This may include abuse and neglect, which may include sexual abuse or exploitation and child criminal exploitation including involvement in county lines. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation or risk of forced marriage.

Early intervention is necessary to identify the existence of any underlying safeguarding concerns and to help prevent the risk of a child going missing in future. Staff need to be aware that non-attendance from college could identify the existence of a safeguarding risk.

If there is any suspicion by staff or peers that the student may be at risk a member of the college Safeguarding team must be informed. Contact should be attempted with the student directly to attempt to establish that the missing student is safe and well and establish their location.

### **Children who are lesbian, gay, bisexual, or gender questioning**

A child or young person being lesbian, gay, or bisexual is not in itself an inherent risk factor for harm, however, they can sometimes be targeted by other children. In some cases, a child who is perceived by other children to be lesbian, gay, or bisexual (whether they are or not) can be just as vulnerable as children who are.

However, the Cass review identified that caution is necessary for children questioning their gender as there remain many unknowns about the impact of social transition and children may well have wider vulnerabilities, including having complex mental health and psychosocial needs, and in some cases additional diagnoses of autism spectrum disorder and/or attention deficit hyperactivity disorder.

It recommended that when families/carers are making decisions about support for gender questioning children, they should be encouraged to seek clinical help and advice.

As such, when supporting a gender questioning child, we should take a cautious approach and consider the broad range of their individual needs, in partnership with the child's parents (other than in the exceptionally rare circumstances where involving parents would constitute a significant risk of harm to the child), including any clinical advice that is available and how to address wider vulnerabilities such as the risk of bullying.

Risks can be compounded where children lack trusted adults with whom they can be open. It is therefore vital that staff endeavour to reduce the additional barriers faced and create a culture where they can speak out or share their concerns with members of staff

### **Children missing from Home**

Children may run away from a problem such as abuse or neglect at home or to somewhere they want to be. They may have been coerced to run away by someone else. Whatever the reason, it is thought that approximately 25 per cent of children and young people that go missing are at risk of serious harm. There are particular concerns about the links between children running away and the risks of sexual exploitation, FGM, forced marriage, radicalisation and travelling to conflict zones. Missing children may also be vulnerable to other forms of exploitation, to violent crime, gang exploitation or to drug and alcohol abuse. The college has a duty to notify the relevant local authority of learners withdrawn from college and suspected reasons why.

If a student has gone missing from home the parents do **not** need to wait 24 hours to inform the Police.

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

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

The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact; it can also occur through the use of technology. CCE can include children being forced to work in cannabis factories, being coerced into moving drugs or money across the country, forced to shoplift or pickpocket, or to threaten other young people. They can also be forced or manipulated into committing vehicle crime.

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.

Some of the following can be indicators of CCE:

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

## **Child on Child Abuse (often referred to as Peer-on-Peer abuse)**

All staff should recognise that children are capable of abusing other children (often referred to as peer-on-peer abuse) and it can take many forms.

This can happen both inside and outside of college and online. All staff should be aware that even if there are no reports in their context, it does not mean it is not happening, it may be the case that it is just not being reported.

It is essential that **all** staff challenge 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.

The college has a **zero-tolerance** approach to sexual violence and sexual harassment.

The different forms of child-on-child abuse are:

- 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, such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence);
- Sexual harassment such as sexual comments, remarks, jokes and online sexual harassment, which may be stand-alone or part of a broader pattern of abuse;
- 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-nude images and or videos (also known as sexting or youth produced sexual imagery);
- Up skirting (which is a criminal offence), which typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm.
- 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).

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

CSE can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. It can involve force and/or enticement-

based methods of compliance and may, or may not, be accompanied by violence or threats of violence.

CSE occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator.

The victim may have been sexually exploited even if the sexual activity appears consensual. CSE does not always involve physical contact; it can also occur through the use of technology. CSE can affect any child or young person (male or female) under the age of 18 years, including 16 and 17 year olds who can legally consent to have sex. It can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity and may occur without the child or young person's immediate knowledge (e.g. through others copying videos or images they have created and posted on social media)

Key indicators of children being sexually exploited may include;

- Going missing for periods of time or regularly coming home late;
- Regularly missing college or education or not taking part in education;
- Displaying inappropriate sexualised behaviour
- Receiving unexplained gift or gifts from unknown sources
- Associating with other young people involved in exploitation;
- Having multiple phones
- Mood swings or changes in emotional wellbeing
- Seen at strange meeting places (hotels or known places of concern)
- Having older boyfriends / girlfriends
- Self-harming / drug or alcohol misuse
- Injuries (physical)

Staff should also be aware that many children and young people who are victims of sexual exploitation do not recognise themselves as such.

**There are three main types of child sexual exploitation:**

- *Inappropriate relationships* - Usually involves just one abuser who has inappropriate power – physical, emotional or financial – or control over a young person. The young person may believe they have a genuine friendship or loving relationship with their abuser.
- *Boyfriend* - Abuser grooms' victim by striking up a normal relationship with them, giving them gifts and meeting in cafés or shopping centres. A seemingly consensual sexual relationship develops but later turns abusive. Victims are required to attend parties and sleep with multiple men and threatened with violence if they try to seek help.
- *Organised exploitation and trafficking* - Victims are trafficked through criminal networks – often between towns and cities – and forced or coerced into sex with multiple men. They may also be used to recruit new victims. This serious organised activity can involve the buying and selling of young people.

## 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 be targeted and recruited into county lines in a number of locations including schools, further and higher educational institutions, student referral units, special educational needs schools, children’s homes and care homes. Children are also increasingly being targeted and recruited online using social media.

Children are often recruited to move drugs and money between locations. 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.

One of the ways of identifying potential involvement in county lines are missing episodes (both from home and college), when the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism should be considered.

If a child is suspected to be at risk of or involved in county lines, a safeguarding referral should be considered alongside consideration of availability of local services/third sector providers who offer support to victims of county lines exploitation.

There may be signs of a change in a young person’s behaviour such as:

- Going missing and subsequently found in areas away from their home;
- Returning home late and/or staying out all night;
- Have been the victim or perpetrator of serious crime (e.g. Knife crime);
- Are involved in receiving requests for drugs via a phone line, moving drugs, handing over and collecting money for drugs;
- Are known to be exposed to techniques such as ‘plugging’, where drugs are concealed internally to avoid detection;
- Are found in accommodation that they have no connection with, often called a ‘trap house or cuckooing’ or hotel room where there is drug activity;
- Increasing drug use, or being found to have large amounts of drugs on them
- Being secretive about who they are talking to and where they are going
- Unexplained absences from school, college, training or work
- Unexplained money, phone(s), clothes or jewellery
- Increasingly disruptive or aggressive behaviour
- Using sexual, drug-related or violent language you wouldn’t expect them to know
- Coming home with injuries or looking particularly dishevelled
- Having hotel cards or keys to unknown places.

## Cybercrime

Cybercrime is criminal activity committed using computers and/or the internet. It is broadly categorised as either 'cyber-enabled' (crimes that can happen off-line but are enabled at scale and at speed on-line) or 'cyber dependent' (crimes that can be committed only by using a computer). Cyber-dependent crimes include:

- unauthorised access to computers (illegal 'hacking'), for example accessing a computer network to look for test paper answers or change grades awarded
- 'Denial of Service' (Dos or DDoS) attacks or 'booting'. These are attempts to make a computer, network or website unavailable by overwhelming it with internet traffic from multiple sources, and,
- making, supplying or obtaining malware (malicious software) such as viruses, spyware, ransomware, botnets and Remote Access Trojans with the intent to commit further offence, including those above.

Children with particular skills and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime.

## Domestic Abuse

The Domestic Abuse Act 2021 introduced the first ever statutory definition of domestic abuse and recognises the impact of domestic abuse on children, as victims in their own right, if they see, hear or experience the effects of abuse.

Children can be victims of domestic abuse. They may suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have a detrimental and long-term impact on their health, well-being, development and ability to learn.

Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child/adolescent to parent violence and abuse. Anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socio-economic status, sexuality or background and domestic abuse can take place inside or outside of the home.

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

The College will offer support through its internal welfare and counselling service and through its partnerships with local agencies, such as Black Country Women's Aid.

## Drug and Substance Misuse

### **Fabricated or Induced Illness**

Fabricated or induced illness is a rare form of child abuse. It occurs when a parent or carer, exaggerated or deliberately causes symptoms of illness in the child. In fabricated or induced illness, the parent may present the child as ill when they are healthy, deliberately induce symptoms of illness, manipulate test results, or exaggerate or lie about symptoms

Some of the indicators of fabricated or induced illness, include:

- the medical history doesn't make sense
- treatment is ineffective
- the symptoms disappear when the carer isn't around, and
- they can be seen repeatedly by different professionals looking for different things.

In all cases, the child's normal life is restricted. Cases of fabricated or induced illness are very complex. Where fabricated and induced illness is suspected, referrals should be made without alerting the child's carer.

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

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

It is also known as 'female circumcision' FGM is usually carried out on young girls between infancy and the age of 15 most commonly before puberty starts. It is illegal to perform FGM in England and Wales, assist a young girl to carry out FGM on herself in England and Wales and assist (from England or Wales) a non-UK person to carry out FGM outside the UK on a UK national or UK resident

The Serious Crime Act 2015 sets out a **legal duty** on professionals as it is **mandatory** that they **personally** notify the police when they discover that Female Genital Mutilation (FGM) appears to have been carried out on a girl under 18.

### **Some of the following signs may be indicators of risk of FGM or a child has undergone FGM**

- Knowing that the family belongs to a community in which FGM is practised and is preparing for the child to take a holiday, arranging vaccinations or planning absence from school.
- The child may talk about a special procedure /ceremony taking place.
- Prolonged absence from education or other activities with noticeable behaviour change on return, possibly with menstrual or bladder problems.
- Children finding it difficult to sit still and look uncomfortable or complaining about pain between the legs spend longer in the bathroom or toilet.

- Appear withdrawn, anxious or depressed.
- Have unusual behaviour after an absence from school or college.
- If a child suspects FGM is going to happen she may run away from home or miss education.
- Talking about somebody doing something to them that they aren't able to talk about.

## **Forced Marriage**

Forcing a person into marriage is a crime in England and Wales.

Forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example).

Nevertheless, some perpetrators use perceived cultural practices as a way to coerce a person into marriage.

Acts such as Forced Marriage and other so called 'honour crimes' come under the definition of Domestic Violence and a child who is subjected to this is at risk of significant harm through physical, sexual and emotional abuse.

Young people forced to marry, or those who fear they may be forced to marry, are frequently withdrawn from education, restricting their educational and personal development. They may feel unable to go against the wishes of their parents and consequently may suffer emotionally, often leading to depression and self-harm.

Since February 2023 it has also been a crime to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday, even if violence, threats or another form of coercion are not used. As with the existing forced marriage law, this applies to non-binding, unofficial 'marriages' as well as legal marriages.

Learners who fear they may be forced to marry often come to the attention of, or turn to, an education professional before seeking help from the police or social services. Often the learner's friends report it to the education professional. Education professionals are in an ideal position to identify and respond to a victim's needs at an early stage.

### **If the learner fears they may be forced to marry, they have limited choices:**

- To remain with the family and try to resolve the situation
- To accede to the family's wishes
- To flee the family
- To seek legal protection.

## **Remember:**



- Remaining with the family and trying to resolve the situation can place the learner in danger.
- Acceding to the family's wishes means the learner is returning to an abusive situation.
- Learners fleeing a forced marriage that has not yet taken place may be reported as missing by their families. The forced marriage aspect of the case may not be apparent when the report is made.
- If the learner has dual nationality, they may have two passports, one British and one from the other country of their residence.

### **What to do if a learner seeks help or if you have suspicions that a learner may be forced to marry**

#### **You must:**

- Ensure that non-attendance including authorised absence from college is reported immediately.
- ***If you have concerns for the safety of a learner under 18 years old*** liaise with a College Safeguarding Officer immediately for advice and report the incident.
- If you cannot locate a Safeguarding Officer, then contact Children's Services for the area that the child resides and Police immediately for advice.
- ***If you have concerns for the safety of a learner over 18 years old*** explain all the options to the learner, recognise and respect their wishes. If the learner does not want any referral to be made, e.g. to the Police, staff will need to consider whether the learner's wishes should be respected or whether the learner's safety requires that further action be taken. If you act against the learner's wishes, you must inform them.
- ***If the learner is a vulnerable adult***, referrals should be made in accordance with the local procedures and protocols to protect vulnerable adults from abuse. Due to the nature of forced marriage and honour-based violence, you need to be aware that it's not always safe or the best place for someone to be with their family and the practice of attempting to resolve cases through family counselling, mediation, arbitration and reconciliation.
- See the learner immediately in a private confidential place, where the conversation cannot be overheard.
- See the learner on their own – even if they attend with others.
- Develop a safety plan in case the learner is seen i.e. prepare another reason why you are meeting.
- Establish if there is a family history of forced marriage, i.e. siblings forced to marry. Other indicators may include domestic violence, self-harm, family disputes, unreasonable restrictions (e.g. withdrawal from education, being confined to home) or missing persons within the family.
- Refer to Safeguarding, who will contact the local police Public Protection Unit (PPU) if there is any suspicion that a crime has been, or may be, committed. They will also liaise with the police if there are concerns about the safety of the learner or the learner's siblings.

#### **Do Not:**

- Treat such allegations merely as a domestic issue and send the learner back to the family home.

- Ignore what the learner has told you or dismiss out of hand the need for immediate protection.
- Approach the learner's family or those with influence within the community, to attempt mediation, as this will alert them to your concerns and may place the learner in danger.
- Contact the family in advance of any enquiries by the police, children's social care or the Forced Marriage Unit, either by telephone or letter.
- Share information outside College Information Sharing protocols without the express consent of the learner.
- Breach confidentiality except where necessary in order to ensure the learner's safety.

### **What to do if a learner is going overseas imminently.**

- Try to gather as much of the following information as possible, as there may not be another opportunity if the learner is intending or is travelling overseas. This information may help the Forced Marriage Unit to locate the learner and assist to repatriate them.
- A photocopy of the learner's passport for retention. Encourage them to keep details of their passport number and the place and date of issue.
- As much information as possible about the family (this will need to be gathered discreetly) including:
  - **Full name and date of birth of the learner under threat**
  - **Their father's name**
  - **Any other addresses of the learner or family based in the UK**
  - **Any addresses where the learner may be staying overseas**
  - **Potential spouse's name**
  - **Date of the proposed wedding**
  - **The name of the potential spouse's father (if known)**
  - **Addresses of the extended family in the UK and overseas.**
- Information that only the learner would be aware of (this may assist any subsequent interview at an Embassy/British High Commission in case another person of the same sex/age is produced pretending to be the learner).
- Details of any travel plans and people likely to accompany the learner.
- Names and addresses of any close relatives remaining in the UK.
- A safe means by which contact may be made with the learner e.g. a secret mobile telephone that will function overseas. Record the number.
- An estimated return date. Ask that the learner to contact you **without fail** on their return.
- A written statement by the learner explaining that they want the police/children's social care/third party to act on their behalf if they do not return/make contact by a certain date.

### **Remember:**

- Give the learner the contact details of the nearest British High Commission/Embassy.

## Further Information

- Advice can be sought from specialist caseworkers at the Forced Marriage Unit on 020 7008 0151 or website [www.fco.gov.uk/en/fco-in-action/nationals/forced-marriage-unit/](http://www.fco.gov.uk/en/fco-in-action/nationals/forced-marriage-unit/)

## Gangs and Youth Violence

Children and young people who are exposed to gangs, gang-related activity and youth violence whether through their family, their peers, the area they live in, or the internet and social media are potentially at risk of significant harm. Providing the right support whilst a child is still in education may protect those vulnerable to exploitation by older gang members and those who are at risk of being drawn further into violent or negative behaviour over time.

Young people join gangs and groups for lots of reasons, including to feel part of something, to feel the excitement, to feel protected and looked out for.

Gang membership can be especially attractive to young people who are more vulnerable because they are not experiencing this sense of belonging or care at home.

Gangs can help people feel safe in numbers, but can also make people feel and be less safe when they are outside of their gang or their gang's territory. Inner city gang members are often restricted geographically by postcodes literally not being able to venture into other areas for fear of attacks by rival gangs

The most effective method to prevent children, young people and vulnerable adults becoming involved in gangs and criminal exploitation is early intervention and identification. This will enable preventative services to be implemented at an early stage to support those affected including relevant family members to make positive life choices and distance themselves from gang related activity.

Any child, young person or vulnerable adult is vulnerable to criminal exploitation and gang affiliation. This can be demonstrated by the number of "clean skins", where they are not known to services. These children, young people and adults do not have an existing criminal record or have not attracted the attention of law enforcement agencies or security forces. Gangs exploit many of these people at a time when they are most vulnerable due to recent bereavement, family separation / divorce, domestic discord or some other traumatic event in their life.

Gangs actively recruit "clean skins" since they are more likely to evade detection or draw attention to themselves from law enforcement agencies.

- To transport and sell drugs
- To launder money through personal bank accounts
- To be trafficked for sexual exploitation
- To store weapons and money

## Indicators of possible gang involvement may include:

- Child withdrawn from family;

- Sudden loss of interest in college or change in behaviour. Decline in attendance or academic achievement (although it should be noted that some gang members will maintain a good attendance record to avoid coming to notice);
- Being emotionally 'switched off', but also containing frustration/rage;
- Starting to use new or unknown slang words;
- Holding unexplained money or possessions;
- Staying out unusually late without reason, or breaking parental rules consistently;
- Sudden change in appearance - dressing in a particular style or 'uniform' similar to that of other young people they hang around with, including a particular colour;
- Dropping out of positive activities;
- New nickname;
- Unexplained physical injuries, and/or refusal to seek/receive medical treatment for injuries;
- Graffiti style 'tags' on possessions, books, walls;
- Constantly talking about another young person who seems to have a lot of influence over them;
- Breaking off with old friends and hanging around with one group of people;
- Associating with known or suspected gang members, closeness to siblings or adults in the family who are gang members;
- Starting to adopt certain codes of group behaviour e.g. ways of talking and hand signs;
- Going missing;
- Being found by Police in towns or cities many miles from their home;
- Expressing aggressive or intimidating views towards other groups of young people, some of whom may have been friends in the past;
- Being scared when entering certain areas; and
- Concerned by the presence of unknown youths in their neighbourhood's.
- An important feature of gang involvement is that, the more heavily a child is involved with a gang, the less likely they are to talk about it.

## **Homelessness**

Being homeless or being at risk of being homeless presents a real risk to a child's welfare. Indicators that a family may be at risk of homelessness include: household debt, rent arrears, domestic abuse and antisocial behaviour as well as the family being asked to leave a property.

In most cases college staff will be considering homelessness in the context of children who live with their families, and intervention will be on that basis. However, it should also be recognised in some cases 16- and 17-year olds could be living independently from their parents or guardians, for example through their exclusion from the family home, and will require a different level of intervention and support

## **Mental Health and Mental Wellbeing**

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.

Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Our staff members however, are well placed to observe

children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.

Where children have suffered abuse, neglect and exploitation, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that our staff members are aware of how these children's experiences can impact on their mental health, behaviour and education. If staff have a mental health concern about a child that is also a safeguarding concern, this will be shared with the Safeguarding Team with a view to referring to appropriate agencies following the referral procedures.

Children exposed to multiple risks such as social disadvantage, family adversity and cognitive or attention problems are much more likely to develop behavioural problems. In order to help children succeed, we have a role to play in supporting them to be resilient and mentally healthy. In addition to the Safeguarding Team and a range of extra-curricular activities to support positive mental wellbeing, we have qualified Counsellors who can provide support to students.

## **Modern Slavery and Human Trafficking**

Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including: sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs.

Traffickers and slave masters use whatever means they have at their disposal to coerce, deceive and force individuals into a life of abuse, servitude and inhumane treatment.

A large number of active organised crime groups are involved in modern slavery. But it is also committed by individual opportunistic perpetrators.

There are many different characteristics that distinguish slavery from other human rights violations, however only one needs to be present for slavery to exist.

### ***Someone is in slavery if they are:***

- Forced to work - through mental or physical threat;
- Owned or controlled by an 'employer', usually through mental or physical abuse or the threat of abuse;
- Dehumanised, treated as a commodity or bought and sold as 'property';
- Physically constrained or has restrictions placed on his/her freedom of movement.
- Not allowed to speak freely during conversations when another person is also present and dominates the conversation.

Contemporary slavery takes various forms and affects people of all ages, gender and races.

**Human trafficking** involves an act of recruiting, transporting, transferring, harbouring or receiving a person through a use of force, coercion or other means, for the purpose of exploiting them.

### ***Possible Indicators:***

Signs of various types of slavery and exploitation are often hidden, making it hard to recognise potential victims. Victims can be any age, gender or ethnicity or nationality. Whilst by no means exhaustive, this is a list of some common signs:

- Victim is not in possession of their legal documents (passport, identification and bank account details) and they are being held by someone else;
- The victim has old or serious untreated injuries and they are vague, reluctant or inconsistent in explaining how the injury occurred.
- The victim looks malnourished, unkempt, or appears withdrawn.
- They have few personal possessions and often wear the same clothes
- Clothes that they wear may not be suitable.
- The victim is withdrawn or appears frightened, unable to answer questions directed at them or speak for themselves and/or an accompanying third party speaks for them. If they do speak, they are inconsistent in the information they provide, including basic facts such as the address where they live.
- They appear under the control/influence of others, rarely interact or appear unfamiliar with their neighbourhood or where they work. Many victims will not be able to speak English.
- Fear of authorities.
- The victim perceives themselves to be in debt to someone else or in a situation of dependence.

## **Preventing Radicalisation – The Prevent Duty**

Children may be susceptible to radicalisation into terrorism.

Prevent is one of four elements of CONTEST, the government's counter-terrorism strategy. It aims to stop people becoming terrorists or supporting terrorism, and promotes safeguarding of young and/or vulnerable people.

The Prevent Duty and Strategy seeks to:

- Respond to the ideological challenge of terrorism and aspects of extremism, and the threat we face from those who promote these views
- Provide practical help to prevent people from being drawn into terrorism and ensure they are given appropriate advice and support
- Work with a wide range of sectors where there are risks of radicalisation which needs to be addressed, including education, criminal justice, faith, charities, the internet and health

The Counter Terrorism and Security Act (2015) placed a duty on further education colleges and the College has a responsibility to ensure that all staff and learners have knowledge in recognising risk and addressing Prevent appropriately. Strategies to meet this obligation include:

- To ensure that learners and staff are aware of their roles and responsibilities in preventing violent extremism
- Staff Induction and briefing sessions
- Enrichment sessions

- To create opportunities for open discussion and to listen and support the learner voice
- To break down segregation among different learner communities including by supporting inter-faith and inter-cultural dialogue and understanding, and to engage all learners in playing a full and active role in wider engagement in society.
- Promotion of British and our college values, namely democracy, rule of law, individual liberty, tolerance and respect for others.
- To ensure learner safety and that the College is free from bullying, risk, harassment and discrimination
- To provide support for learners who may be at risk and appropriate sources of targeted advice and guidance

### **Staff and Learner Prevent Training**

- **Student Induction** – All new learners receive a comprehensive induction including information on the Prevent Duty. The college commissions a Home Office approved provider to deliver theatre-based presentations during the induction period.
- All staff will be offered training in order to understand factors which make learners vulnerable to extremist ideas and know what action they should take. Staff will be encouraged to complete the Home Office e-learning module on Prevent awareness.

### **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 Government in the Prevent Strategy as: Vocal or active opposition to fundamental values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. Also included in the definition of extremism are calls for the death of members of the UK armed forces, whether in this country or overseas.

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.

Individuals 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:**

The below points should not be triggers that instantly lead to believe that an individual is being led into extremism. They are factors which together can sometimes contribute towards an overall position of vulnerability.

**Identity Crisis** – an individual is distanced from their cultural / religious heritage and experiences discomfort about their place in society;

**Personal Crisis** – the individual may be experiencing family tensions; a sense of isolation/rejection; and low self-esteem or self-worth; 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 individual's country or region of origin may contribute to a sense of grievance that is triggered by personal experience of racism, discrimination or aspects of Government policy;

**Unmet Aspirations** – the individual may have perceptions of injustice; a feeling of failure; rejection of civic life;

**Experiences of Criminality** – which may include involvement with criminal groups, imprisonment, and poor resettlement/reintegration;

**Mental Health** – Conditions and disorders such as depression, anxiety, bi-polar and psychosis can make individuals interpret their surroundings or events in a distorted way.

**Special Educational Need** – individuals may experience difficulties with social interaction, empathy with others, understanding the consequences of their actions and awareness of the motivations of others. There could be a level of vulnerability due to exploitation by others due to a learning disability.

**Bereavement, loss, transition** – These can play a part in individuals looking for answers or seeking meaning in life. Sometimes a sudden, traumatic event can be the time a radicaliser turns up with a shoulder to cry on.

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

Early indicators of radicalisation or extremism may include:

- Showing sympathy for extremist causes
- Glorifying violence, especially to other faiths or cultures
- Making remarks or comments about being at extremist events or rallies outside college
- Evidence of possessing illegal or extremist literature
- Advocating messages similar to illegal organisations or other extremist groups



- Out of character changes in dress, behaviour and peer relationships (but there are also very powerful narratives, programmes and networks that young people can come across online so involvement with particular groups may not be apparent.)
- Secretive behaviour
- Online searches or sharing extremist messages or social profiles
- Intolerance of difference, including faith, culture, gender, race or sexuality
- Graffiti, art work or writing that displays extremist themes
- Attempts to impose extremist views or practices on others
- Verbalising anti-Western or anti-British views
- Advocating violence towards others.

More critical risk factors 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; and
- Significant changes to appearance and/or behaviour;
- Experiencing a high level of social isolation resulting in issues of identity crisis and/or personal crisis.

## Referral

**Identification of Concern** - In the event of noticing changes about a learner that are in relation to vulnerabilities towards radicalisation and extremism, or having concerns for their welfare, staff need to contact the Safeguarding team. The Safeguarding team will act on a case-by-case basis according to the information given to them. The team will make any assessments or external referrals as required.

The college will refer any incidents of suspected radicalisation or children deemed at risk on a multi-agency referral form (MARF marked as a Prevent referral.

Contact can be made with the confidential Anti-Terrorist Hotline 0800 789 321 or contact made with the Sandwell LA Prevent Strategy Coordinator [Pardeep brar@sandwell.gov.uk](mailto:Pardeep_brar@sandwell.gov.uk) [Justin nixon@sandwell.gov.uk](mailto:Justin_nixon@sandwell.gov.uk) or [sarfraz\\_khan@sandwell.gov.uk](mailto:sarfraz_khan@sandwell.gov.uk) for further advice.

**In an Emergency** – Call 999 or contact the anti-terrorist hotline on 0800 789 321. If you believe that someone is in immediate danger; think that someone may be travelling to join an extremist group; see or hear something that may be terrorist related.

## Private Fostering

Private fostering is an arrangement made between the parent and the private foster carer, who then becomes responsible for caring for the child in such a way as to safeguard and promote his/her welfare.

A privately fostered child means a child under the age of 16 (18 if a disabled child) who is cared for and provided with accommodation by someone other than:

- a parent
- a person who is not a parent but has parental responsibility
- a close relative
- a Local Authority

for more than 28 days and where the care is intended to continue. It is a statutory duty for the college to inform the Local Authority where we are made aware of a child or young person who may be subject to private fostering arrangements.

### **Self-Harming**

Self-Harming is becoming much more prevalent in society and our staff must be trained to effectively and swiftly spot tell-tale signs. Because self-injury is often kept secret, it may be difficult to identify signs and symptoms.

Signs may include:

- Scars, such as from burns or cuts
- Fresh cuts, scratches or other wounds
- Bruises
- Broken bones
- Keeping sharp objects on hand
- Spending a great deal of time alone
- Wearing long sleeves or long pants even in hot weather
- Acting in a very conscious manner

Please note that the college has a dedicated **Self-Harm and Suicidal Behaviour Prevention Policy**.

### **Serious Violence**

There are a number of 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.

## Sexual Violence and Sexual Harassment

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. 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 and that the college should **respond to all reports and concerns** including those that have happened outside the college premises.

All staff working with children are advised to maintain an attitude of '**it could happen here**'.

Addressing inappropriate behaviour (even if it appears to be relatively innocuous) can be an important intervention that helps prevent problematic, abuse and/or violent behaviour in the future.

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 college staff are supported and protected as appropriate.

Everyone should be aware of the importance of:

- making clear that there is a zero-tolerance approach to sexual violence and sexual harassment, this is never acceptable, will never be tolerated and is not an inevitable part of growing up;
- not tolerating or dismissing sexual violence or sexual harassment as "banter", "part of growing up", "just having a laugh" or "boys being boys";
- challenging behaviour (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia and flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them; and understanding that all of the above can be driven by wider societal factors beyond the college, such as everyday sexist stereotypes and everyday sexist language.

### Sexual violence

Sexual violence refers to sexual offences under the Sexual Offences Act 2003 and includes rape and sexual assault.

It is important that schools and colleges are aware of sexual violence and the fact children can, and sometimes do, abuse other children in this way and it **can happen both inside and outside of school/college**. When referring to sexual violence we are referring to sexual violence offences under the Sexual Offences Act 2003, as described below.

### Rape

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

### **Assault by Penetration**

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

### **Sexual Assault**

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

### **Causing someone to engage in sexual activity without consent**

A person (A) commits an offence if: s/he intentionally causes another person (B) to engage in an activity, the activity is sexual, B does not consent to engaging in the activity, and A does not reasonably believe that B consents. (This could include forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.)

### **Consent – What is consent?**

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

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

### **Sexual harassment**

For the purpose of this policy, when referring to sexual harassment we mean 'unwanted conduct of a sexual nature' that can occur online and offline. When we reference sexual harassment, we do so in the context of child on child sexual harassment. Sexual harassment is likely to: violate a child's dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment.

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

- sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names;
- sexual “jokes” or taunting;
- physical behaviour, such as: deliberately brushing against someone, interfering with someone’s clothes (colleges should be considering when any of this crosses a line into sexual violence - it is important to talk to and consider the experience of the victim
- displaying pictures, photos or drawings of a sexual nature; and;
- up skirting (which is a criminal offence) and;

**Online sexual harassment;** this may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence. It may include;

- non-consensual sharing of nudes and semi-nude images and/or videos;
- sharing of unwanted explicit content;
- sexualised online bullying;
- unwanted sexual comments and messages, including, on social media; and
- sexual exploitation; coercion and threats.
- coercing others into sharing images of themselves or performing acts they are not comfortable with online.

### **Immediate response to a report of sexual violence and/or sexual harassment**

Even if a victim requests otherwise, if you suspect that a child has been raped or subject to another form of penetrative or sexual assault, this should be reported to the Police.

The initial response to a report from a child is important. It is essential that all victims are reassured 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 sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

Effective safeguarding practice includes:

- Not promising confidentiality at this initial stage as it is very likely a concern will have to be shared further (the designated safeguarding lead, the Police or children’s social care) to discuss next steps.
- Staff should only share the report with those people who are necessary in order to progress it. It is important that the victim understands what the next steps will be and who the report will be passed to;
- Recognising a child is likely to disclose to someone they trust: this could be **anyone** on the school or college staff. It is important that the person to whom

the child discloses recognises that the child has placed them in a position of trust. They should be supportive and respectful of the child;

- Recognising that an initial disclosure to a trusted adult may only be the first incident reported, rather than representative of a singular incident and that trauma can impact memory and so children may not be able to recall all details of timeline of abuse;
- Listening carefully to the child, reflecting back, using the child's language, being non-judgmental, being clear about boundaries and how the report will be progressed, not asking leading questions and only prompting the child where necessary with open questions – where, when, what, etc. It is important to note that whilst leading questions should be avoided, staff can ask children, if they have been harmed and what the nature of that harm was;
- Considering the best way to make a record of the report. Best practice is to wait until the end of the report and immediately write up a thorough summary. This allows the staff member to devote their full attention to the child and to listen to what they are saying. It may be appropriate to make notes during the report (especially if a second member of staff is present). However, if making notes, staff should be conscious of the need to remain engaged with the child and not appear distracted by the note taking. Either way, **it is essential a written record is made;**
- Only recording the facts as the child presents them. The notes should not reflect the personal opinion of the note taker. Be aware that notes of such reports could become part of a statutory assessment by children's social care and/or part of a criminal investigation;
- Where the report includes an online element, the key consideration is for staff **not** to view or forward illegal images of a child.
- If possible, managing reports with two members of staff present, (preferably one of them being the designated safeguarding lead or a deputy). However, this might not always be possible;
- Informing the designated safeguarding lead (or deputy), as soon as practically possible, if the designated safeguarding lead (or deputy) is not involved in the initial report.

### **Sexting (Youth Produced Sexual Imagery)**

It is important to be aware that young people involved in sharing sexual videos and pictures may be committing a criminal offence. There are several definitions of sexting but basically it is defined as 'images or videos generated by or of children under the age of 18 which are of a sexual nature or are indecent'.

Crimes involving indecent photographs (including pseudo images) of a person under 18 years of age fall under Section 1 of the Protection of Children Act 1978 and Section 160 Criminal Justice Act 1988. Under this legislation it is a crime to:

- Take an indecent photograph or allow an indecent photograph to be taken;

- Make an indecent photograph (includes downloading or opening an image that has been sent via email);
- Distribute or show such an image;
- Possess with or without the intention of distributing images;

Although unlikely to be prosecuted as the outcome could be extremely detrimental to their future health and wellbeing children who send, possess and/or share indecent images need to be aware that they may be breaking the law and there are cases where children and young people have been convicted and sent to prison. They are however likely to be visited by police and risk media equipment being removed. If it is a case that involved an adult the process and potential outcome will be very different.

The Designated Safeguarding Lead (DSL) or Deputy should be informed of any such incidents to decide if this should be passed to the police. Devices thought to contain indecent images should be set to flight mode or switched off. If both sender and receiver are below 18 and there is no coercion; vulnerability; previous incidents or other circumstances that may add cause for concern the DSL may log the event and disciplinary action may be taken otherwise the situation will be escalated and local authority or police informed.

### **So-called 'Honour Based' Abuse**

**Is a crime or incident which may have been committed to protect or defend the honour of the family or community.**

It is often linked to family members or acquaintances (and can include multiple perpetrators) who mistakenly believe someone has brought shame to their family or community by doing something that is not in keeping with the traditional beliefs of their culture. For example, honour-based violence 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
- 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

Crimes of 'honour' do not always include violence. Crimes committed in the name of 'honour' might include:

- domestic abuse
- threats of violence
- sexual or psychological abuse
- being held against your will or taken somewhere you don't want to go
- forced marriage

A forced marriage is one that is carried out without the consent of both people. This is very different to an arranged marriage, which both people will have agreed to.

There is no religion that says it is right to force you into a marriage and you are not betraying your faith by refusing such a marriage.

## **Up Skirting**

Up Skirting is a criminal offence under the Voyeurism (Offences) Act 2019. The CPS defines 'up skirting' as a colloquial term referring to the action of placing equipment such as a camera or mobile phone beneath a person's clothing to take a voyeuristic photograph without their permission. It is not only confined to victims wearing skirts or dresses and equally applies when men or women are wearing kilts, cassocks, shorts or trousers. It is often performed in crowded public places, for example on public transport or at music festivals, which can make it difficult to notice offenders.

## **Violence Against Women and Girls (VAWG)**

VAWG is defined as any act of gender-based violence that results in, or is likely to result in physical, sexual or psychological harm or suffering to women including threats of such acts, coercion or arbitrary deprivation of liberty, whether occurring in public or private life. VAWG is the umbrella term which brings together multiple forms of serious violence such as crimes committed in the name of "honour"; domestic abuse; female genital mutilation (FGM); forced marriage; sexual violence, abuse, exploitation and rape; stalking; harassment; trafficking for sexual exploitation; prostitution. If members of staff have a concern about or knowledge of any VAWG incidents, they will share it immediately with the DSL with a view to referring to appropriate agencies.

## **17. Appendices**

- 1. Key Contacts**
- 2. Safeguarding Referral Flowchart**
- 3. Safeguarding reporting form**
- 4. Safeguarding Do and Don'ts**

## **Key Contacts**



## West Midland Child Protection contact details

Agency	Contact Details
Birmingham Children's Advice & Support Service (CASS)	0121 303 1888
Sandwell Children Trust	0121 569 3100
Dudley Safeguarding	0300 555 0050
Walsall Children's Services	0300 555 2866
Wolverhampton Children's Services	01902 555392

## Emergency

Sandwell Adult Social Care (Concerns about adults) 0121 569 2266

Forced Marriage Unit 020 7008 0151

West Midlands Police 999 or 101

## Other Organisations

Black Country Women's Aid 0121 553 0090

NSPCC Helpline 0808 800 5000

Child line 0800 1111

24 hour National Domestic Violence Freephone Helpline 0800 2000 247

Shelter – for housing advice 0808 800 4444

MIND – mental health charity 0300 23 3393

Victim Support 0808 1689 1111

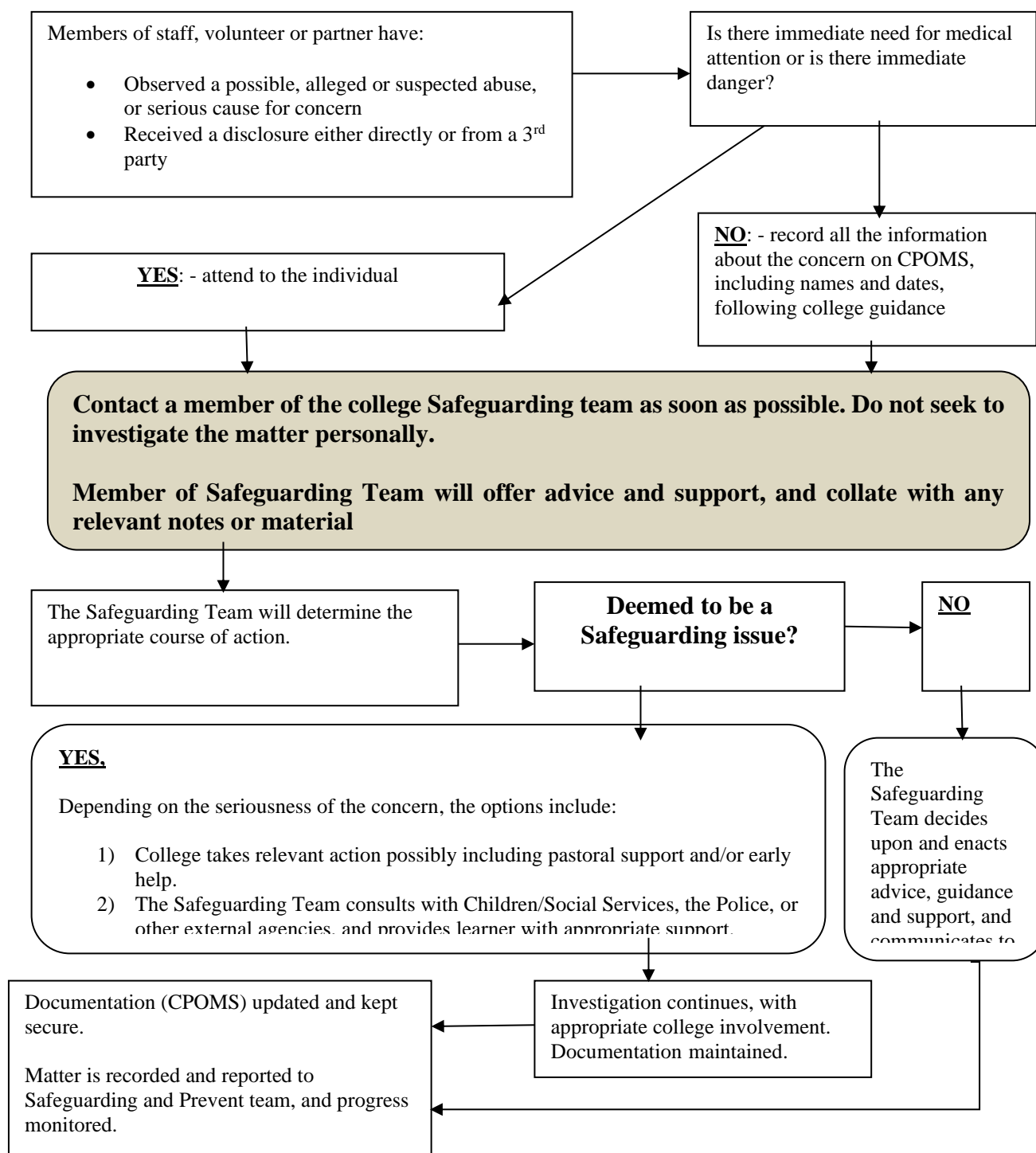
National Stalking Charity 0808 802 0300

Survivors UK - Adult survivors of childhood abuse or male rape 0203 598 3898

**NB - All** Contacts checked and correct – September 2023. Please contact a member of the Safeguarding Team if found to be incorrect or changed.

## Safeguarding Referral Flowchart

**Sandwell College Safeguarding Flowchart procedure is for responding to and recording possible, alleged or suspected abuse, or serious causes for concern.**



## Safeguarding Do and Don'ts

- Do find out who the college designated safeguarding officer is and who the safeguarding team are.
- Do ensure that the person is not in any risk of immediate danger - if they are, seek Police or medical assistance (999).
- Do find a quiet, confidential, secure area for you and the learner.
- Do not place yourself or anyone else in danger.
- Never promise confidentiality – you will have to break it and with it the person's trust in you.
- Do remember, that the child, young person or adult may not want their family informed. In this instance seek advice from a member of the Safeguarding team in the first instance or if not quickly available then seek advice from the Social Services/Police.
- Do not interfere with, or contaminate potential evidence following a physical or sexual assault, for example, by get the learner to wash, change clothing etc.
- Do listen and stay calm, you need to listen without making any assumptions or judgements.
- Do not interview the child, young person or adult at risk of harm. Question normally, quietly and without any pressure and only seek clarity and to be sure that you understand what you have heard. Never ask leading questions or act as an investigator. Do not lead or put words in the person's mouth.
- Do reassure that by telling you, they have done completely the right thing.
- Do inform them that you must pass the information on, but that only those that need to know about it will be told. Inform them of whom you will report the matter to.
- Do record information on the relevant safeguarding records immediately on CPOMS and make the appropriate referral with confidentiality.
- Do not investigate concerns or allegations yourself, but report them immediately to a member of the safeguarding team.
- Don't, in any circumstances, discuss the issue with the alleged perpetrator(s).
- Don't do nothing - tell Safeguarding or the relevant authorities immediately.