

South Thames Colleges Group

SAFEGUARDING CHILDREN AND VULNERABLE ADULTS POLICY

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1. Introduction

- 1.1. This policy should be read in conjunction with the safer recruitment of staff, and the safeguarding and external contractor’s procedures.
- 1.2. South Thames Colleges’ Group is committed to safeguarding and promoting the welfare of children and vulnerable adults and to ensuring that action is taken to support them if they are at risk of significant harm. Safeguarding and promoting the welfare of children is **everyone’s** responsibility. **Everyone** who comes into contact with children and their families has a role to play. The Group requires all staff, governors, volunteers and those contracted to provide services should consider at all times what is in the best interests of the child or vulnerable adult.
- 1.3. The Group requires all staff to demonstrate high standards in their management of risk and in the active protection of children and vulnerable adults from discrimination and avoidable harm. Staff are required to fulfil their duties for young people under 18 in accordance with the Children Acts 1989 and 2004, Children and Social Work Act 2017, Keeping Children Safe in Education (September 2019), Counter Terrorism and Security Act 2015, The Prevent Duty 2016 and to safeguard vulnerable adults in accordance with the Vulnerable Groups Act 2006 and the Care Act 2014
- 1.3. The Group recognises that the welfare of the learner is paramount and that all learners regardless of age, disability, gender, ethnic origin, religious belief, sexual orientation or identity have the right to

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protection from all types of harm or abuse. Working in partnership with children, vulnerable adults, their parents, carers and other agencies is essential in promoting the welfare of individuals.

- 1.5. This policy should be read in conjunction with individual College’s safeguarding procedures.

2. Purpose and principles

- 2.1. The purpose of this policy is to provide a framework that informs procedures relating to the College’s legal obligations to safeguard and protect children and vulnerable adults who are at risk of significant harm, suffering forms of abuse or are at risk of radicalisation.
- 2.2. This policy provides clear direction to all members of the college community to ensure child protection and vulnerable adult concerns, referrals and monitoring of actions are handled sensitively, professionally and in ways that promote the welfare of the learners and support their needs e.g. learners are encouraged to talk and are listened to. The policy also makes a commitment to the development of good practice and sound procedures.
- 2.3. Accordingly, all staff receive a copy of this policy and are required to read and be familiar with the statutory guidance ‘Keeping Children Safe in Education’ 2019 Part One/ Annex A and undertake regular refresher training.
- 2.4. The following principles underpin the application of this policy:
 - 2.4.1. The Group follows the statutory guidance ‘Working Together to Safeguard Children’ (HM Government, July 2018) which covers the legislative requirements and expectations on individual services to safeguard and promote the welfare of children. Schools and colleges must have regard to this guidance when carrying out their duties to safeguard and promote the welfare of children; along with non-statutory guidance ‘What to do if you are worried a child is being abused’ (HM Government, March 2015) and ‘Information Sharing: advice for practitioners providing safeguarding services’ (DfE July 2018).
 - 2.4.2. Safeguarding also covers vulnerability to violent extremism and the specific need to safeguard children and young people from potential radicalisation. Section 26 of the Counter Terrorism and Security Act, 2015 places a duty on colleges to have “due regard to the need to prevent people from being drawn into terrorism”.
 - 2.4.3. Safeguarding also encompasses issues such as learner health and safety; serious violence; peer on peer abuse including bullying; sexual violence: upskirting and sexting; (Sexual Violence and Sexual Harassment between Children in Schools and Colleges, HM Government 2018), arrangements to meet medical need; provision of first aid; college security; access to and use of information technology.
 - 2.4.4. The Group’s policy and procedures for safeguarding mirror Local Authority Safeguarding Children partnerships and are based upon the London Child Protection Procedures and Practice Guidance (5th Edition 2017, <http://www.londoncp.co.uk>) and the Local Authorities Multi Agency Adult Protection Policy, Guidelines and procedures.

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3. Scope

- 3.1. The policy applies to all learners, governors, staff and volunteers working for the College in all locations where education and training is delivered to children and vulnerable adults. It applies also to those situations where learners are in a workplace setting undertaking vocational training or studying for vocational qualifications. The policy also covers collaborative provision and staff employed directly by contractors supplying services on behalf of the College. Subcontractors of educational provision are required to have and adhere to their own safeguarding policies and procedures which are in line with relevant legislation and statutory guidance.
- 3.2. Safeguarding and promoting the welfare of children is defined in KCSIE 2019 as:
 - 3.2.1. protecting children from maltreatment
 - 3.2.2. preventing impairment of children’s health or development
 - 3.2.3. ensuring that children grow up in circumstances consistent with the provision of safe and effective care
 - 3.2.4. taking action to enable all children to have the best outcomes
- 3.3. A ‘child’ is defined as a person aged up to 18. ‘Keeping Children Safe in Education’ 2019 recognises the additional vulnerabilities of ‘looked after children’ and care leavers. The Children Act 2004 also covers vulnerable adults with a disability up to the age of 25. A vulnerable adult is defined as “a person aged 18 or over who is, or may be in need of community care services by reason of mental or other disability, age or illness; and who is or may be unable to take care of him/herself, or unable to protect themselves against significant harm or exploitation” (Safeguarding Vulnerable Groups Act 2006).

4. Main Elements

- 4.1. The 3 main elements of the Policy are to:

Prevent

- 4.1.1. Raise awareness of child protection and vulnerable adults’ issues amongst all staff and volunteers and of what to do if they have concerns
- 4.1.2. Provide training for all staff to proactively engage in preventing radicalisation and extremism, as part of the Government’s “Prevent” strategy
- 4.1.3. Provide training for all staff to be aware of the indicators of serious violence and its associated risks regarding youth violence, gang involvement and exploitation of children through child criminal exploitation and county lines.
- 4.1.4. Ensure that all adults within the College who have access to children, young people and vulnerable adults have been subject to appropriate checks using safer recruitment practices
- 4.1.5. Maintain and review a central record of DBS checks and comply with the duty of employers to inform the DBS of any individual (paid employee, volunteer or other) who poses a threat to children or vulnerable adults
- 4.1.6. Ensure appropriate response to any concern or allegation about a member of staff or volunteer

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- 4.1.7. Develop effective links with relevant agencies and co-operate as required with their enquiries regarding child protection/ vulnerable adult matters including attendance at strategy meetings, case conferences, core group meetings and other relevant child or vulnerable adult protection meetings.

Protect

- 4.1.8. Establish and maintain a safe environment in which students feel secure and are encouraged to talk freely about anything that concerns them
- 4.1.9. Ensure students know that they can approach their tutor or other members of staff if they are worried about anything, including issues related to radicalisation, extremism and serious violence
- 4.1.10. Provide early intervention and support as soon as a problem emerges at any point in the young person’s or vulnerable adult’s life
- 4.1.11. Include opportunities in the curriculum to develop and equip students with the skills needed to recognise risks and stay safe from abuse
- 4.1.12. Support students who have been abused or may be at risk of harm, including self-harm, in accordance with any agreed child protection plan
- 4.1.13. Ensure staff follow accepted health and safety practices when working with students and that, where appropriate, risk assessments are carried out
- 4.1.14. Help students who are over 18 and not defined as vulnerable adults if they feel they are at risk through creating an environment, where they are encouraged to talk to the police and/or other specialist services.

Record and monitor

- 4.1.15. Ensure staff are aware of the need to report and record any concerns held about the learner within the College, the need to keep safeguarding records separate to tutorial records and secure, and when they should be passed on to other agencies.

5. Group Roles and Responsibilities

- 5.1. Safeguarding is a fundamental responsibility of all individual staff, however the oversight and management of safeguarding within the group is given to the Corporation, the Principal/CEO, the Senior Post-Holder with responsibility for safeguarding, the Designated Safeguarding Lead and the Deputy Designated Safeguarding Leads. They ensure that structures and staffing are in place to ensure the effective delivery of safeguarding procedures within the individual Colleges.

5.2. Responsibilities of the Corporation

The Corporation will:

- 5.2.1. Approve and annually review the Group Safeguarding Policy
- 5.2.2. Select a Governor to take leadership responsibility within the Corporation for the organisation’s safeguarding arrangements.

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- 5.2.3. Ensure an appropriate senior member of staff, from the school or college leadership team, is appointed to the role of designated safeguarding lead. The designated safeguarding lead should take lead responsibility for safeguarding and child protection. This will be explicit in the role-holder’s job description and they should have the time and resources to fulfil this responsibility.
- 5.2.4. Ensure there are procedures in place to manage concerns/allegations, against staff (including volunteers) that might indicate they would pose a risk of harm to children. Furthermore, the Governing Body will ensure that the Group:
- 5.2.5. Raises awareness of issues relating to safeguarding and promote the welfare of children, young people and vulnerable adults
- 5.2.6. Provides a safe environment in which students learn
- 5.2.7. Identifies children and young people who are suffering, or at risk of suffering, significant harm and takes appropriate action to see that such children and young people are kept safe
- 5.2.8. Identifies students at risk of radicalisation to support them
- 5.2.9. Has procedures for reporting and dealing with allegations of abuse against members of staff and volunteers
- 5.2.10. Operates safe recruitment procedures
- 5.2.11. Remedies any deficiencies or weaknesses in regard to child protection arrangements that are brought to the Governing Body or management attention
- 5.2.12. Has in place appropriate filtering and monitoring systems for on-line safety
- 5.2.13. Ensures that learners are taught about safeguarding through teaching and learning opportunities which are part of a broad curriculum.

5.3. Responsibilities of the Principal/CEO

The Principal/CEO will:

- 5.3.1. Ensure the Group’s Policy for Safeguarding children and vulnerable adults and other related College policies and procedures (including the safer recruitment of staff and managing cases of allegations made against staff) are in place and implemented to ensure the welfare of learners.
- 5.3.2. Delegate operational responsibility and implementation of procedures to a Senior Postholder and a Designated Safeguarding Lead
- 5.3.3. Receive immediate notification of any changes affecting the policy or procedures and ensure the policy is reviewed and amended as appropriate.
- 5.3.4. Ensure staff are familiar with this Policy and Procedure, and specifically have read KCSE 2019. Part One and Annex A

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5.4. Responsibilities of the allocated Senior Post-Holder – Principal Merton and Carshalton College

The Senior Post-Holder will:

- 5.4.1. Have overall strategic responsibility for Safeguarding across the Group
- 5.4.2. Act as line Manager for the Designated Safeguarding Lead
- 5.4.3. Ensure that the Group has appropriate up to date safeguarding policies and procedures in place to ensure the safeguarding of all children and vulnerable adults, and that these are reviewed at least annually
- 5.4.4. Ensure that there are Deputy Designated Safeguarding Leads in each of the Group’s Colleges, and that safeguarding arrangements in each College are fit for purpose

5.5. Responsibilities of the College Principal

The College Principal will:

- 5.5.1. Ensure the Group’s Policy for Safeguarding children and vulnerable adults and associated College procedures are implemented in their College to ensure the welfare of learners
- 5.5.2. Be responsible for receiving allegations against members of staff, contractors and volunteers (except where the allegation concerns the College Principal in which case the allegation should be reported to the Group Principal and CEO) and passing them on to the Director of Human Resources and Designated Safeguarding Lead.

5.6. Responsibilities of the STCG Group Designated Safeguarding Lead – Assistant Principal Student Services.

The Designated Safeguarding Lead has the ultimate lead responsibility for safeguarding in the College. The full list of responsibilities as required by Keeping Children Safe in Education 2019 is contained in Annex B. In summary the Designated Safeguarding Lead will:

- 5.6.1. Coordinate safeguarding practices across the Group
- 5.6.2. Liaise with Heads of College/College Principals and the Director of Human Resources to deal with allegations against members of staff, contractors and volunteers
- 5.6.3. Consult with the Designated Officer from the relevant Local Authority as appropriate, in order to ensure that all allegations against staff, contractors and volunteers are dealt with in an objective and transparent way
- 5.6.4. Ensure that the Director of Human Resources records details of any allegations against staff, contractors and volunteers and carries out any agreed actions with the Designated Officer from the relevant Local Authority and reports on outcomes
- 5.6.5. Act as an external contact person within the College, providing advice and support and ensuring that all staff (including temporary, supply staff and volunteers and members of the Governing Body) are aware of their role

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- 5.6.6. Work with the Deputy Designated Safeguarding Leads to co-ordinate action within each College on child protection issues
- 5.6.7. Work with pan- London or local Safeguarding partners (previously boards)
- 5.6.8. Ensure students are aware of the issues around safeguarding and Prevent, through enrichment and tutorial activities and know who to talk to if they have any concerns
- 5.6.9. Raise awareness about safeguarding and child protection on an on-going basis
- 5.6.10. Arrange updates on safeguarding training for staff on an annual basis and induction training on child protection for new staff
- 5.6.11. Ensure that all staff receive update training on a regular basis, at least annually
- 5.6.12. Have the DSL role specified with their job description

5.7. Responsibilities of the Deputy Designated Safeguarding Lead (Heads of Student Support Services) or Duty Principal

The DDSL will:

- 5.7.1. Be trained to the same standard as the DSL
- 5.7.2. Take operational responsibility for safeguarding in an individual College within the Group (which may include more than one site) or to deputise at other sites
- 5.7.3. Act as a senior adviser for other safeguarding officers (nominates or advisers), with guidance on cases within the college
- 5.7.4. Oversee safeguarding cases within a particular College, liaising with social workers, local authorities and other agencies, referring any serious cases to the Designated Safeguarding Lead
- 5.7.5. Make referrals to external agencies as appropriate
- 5.7.6. Attend or work with pan-London or local safeguarding partners (previously boards) on behalf of the DSL
- 5.7.7. Have the Deputy DSL role specified with their job description

5.8. Responsibilities of individual members of staff

- 5.8.1. All staff have a responsibility to provide a safe environment in which children can learn and 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.
- 5.8.2. All staff should familiar with how to make a safeguarding referral, and any staff member who has a concern about a child’s welfare should follow the Group’s referral processes

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- 5.8.3. All staff must undertake initial safeguarding training followed by regular updates
- 5.8.4. All staff should know what to do if a child tells them he/she is being abused or neglected
- 5.8.5. Whilst all staff should speak to the Designated Safeguarding Lead (or deputy) with regard to any concerns about female genital mutilation (FGM), there is a specific legal duty on teachers. If a teacher, in the course of their work in the profession, discovers that an act of FGM appears to have been carried out on a girl under the age of 18, the teacher has a duty to ensure this is reported to the police
- 5.8.6. Refer any concerns they may have about any member of staff in relation to the safeguarding of a child or vulnerable adult to the College Principal.
- 5.8.7. In relation to safeguarding, all concerns, discussions and decisions made, and the reasons for those decisions, should be recorded in writing.

6. Whistleblowing

- 6.1 As stated in KCSIE 2019, ‘all staff and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in the Groups safeguarding regime and know that such concerns will be taken seriously by the Group’s senior Leadership team.’
- 6.2 If a member of staff, governor, volunteer or visitor has concerns about how a potential or actual safeguarding case is being managed, these should be raised with the Designated Safeguarding Lead in the first instance. If the person raising the concern is not satisfied with the response and believes that there are significant failings, then the whistleblowing policy should be consulted.

7. Review

- 7.1. The policy will be subject to annual review and approval by Governors. The review will be initiated by the Designated Safeguarding Lead and will involve consultation with staff, managers, governors and students where appropriate.

8. Access to the policy

- 8.1. The policy will be published on each College’s website.

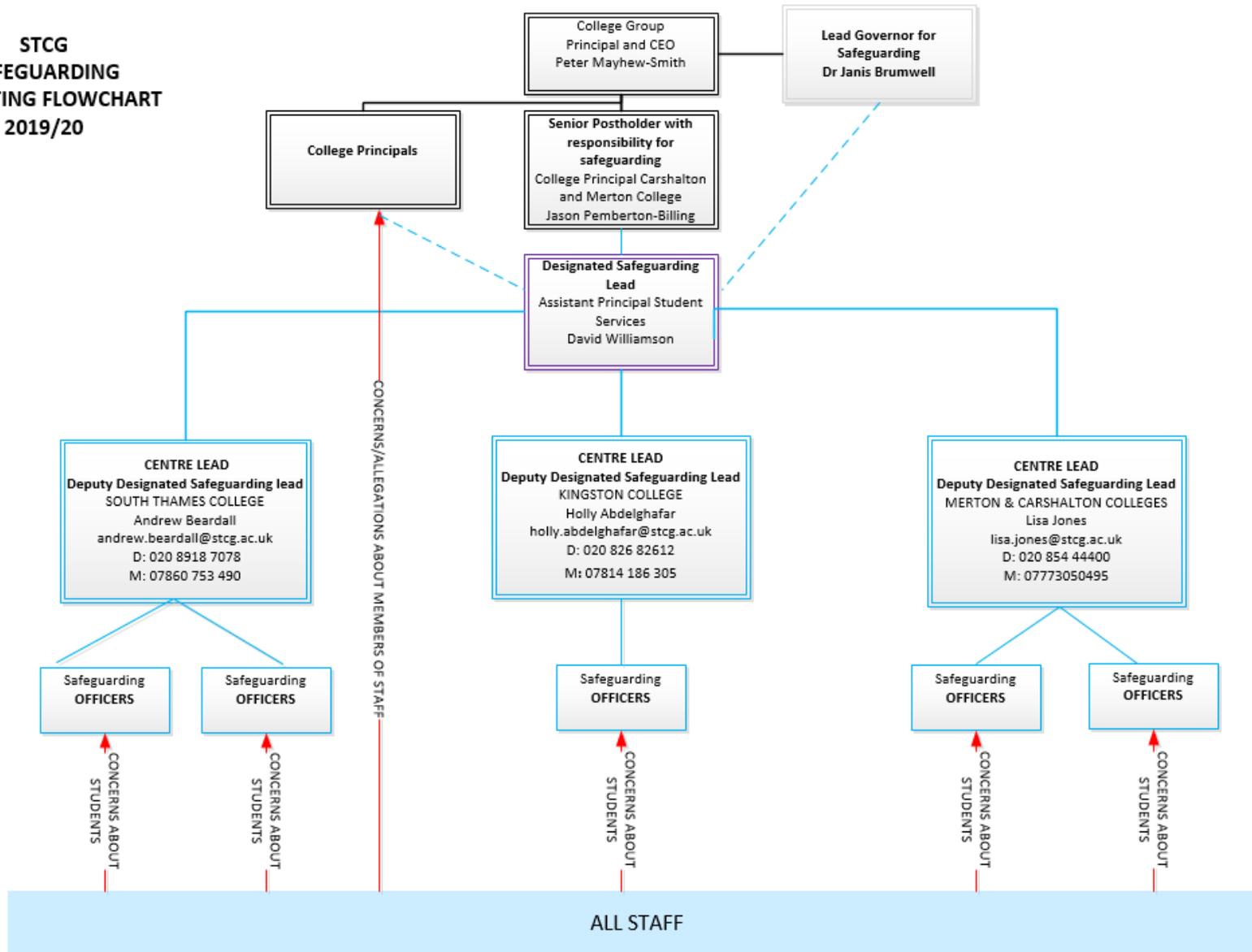
9. Safeguarding Reporting Flowchart

- 9.1 The flowchart below shows the process for reporting concerns about

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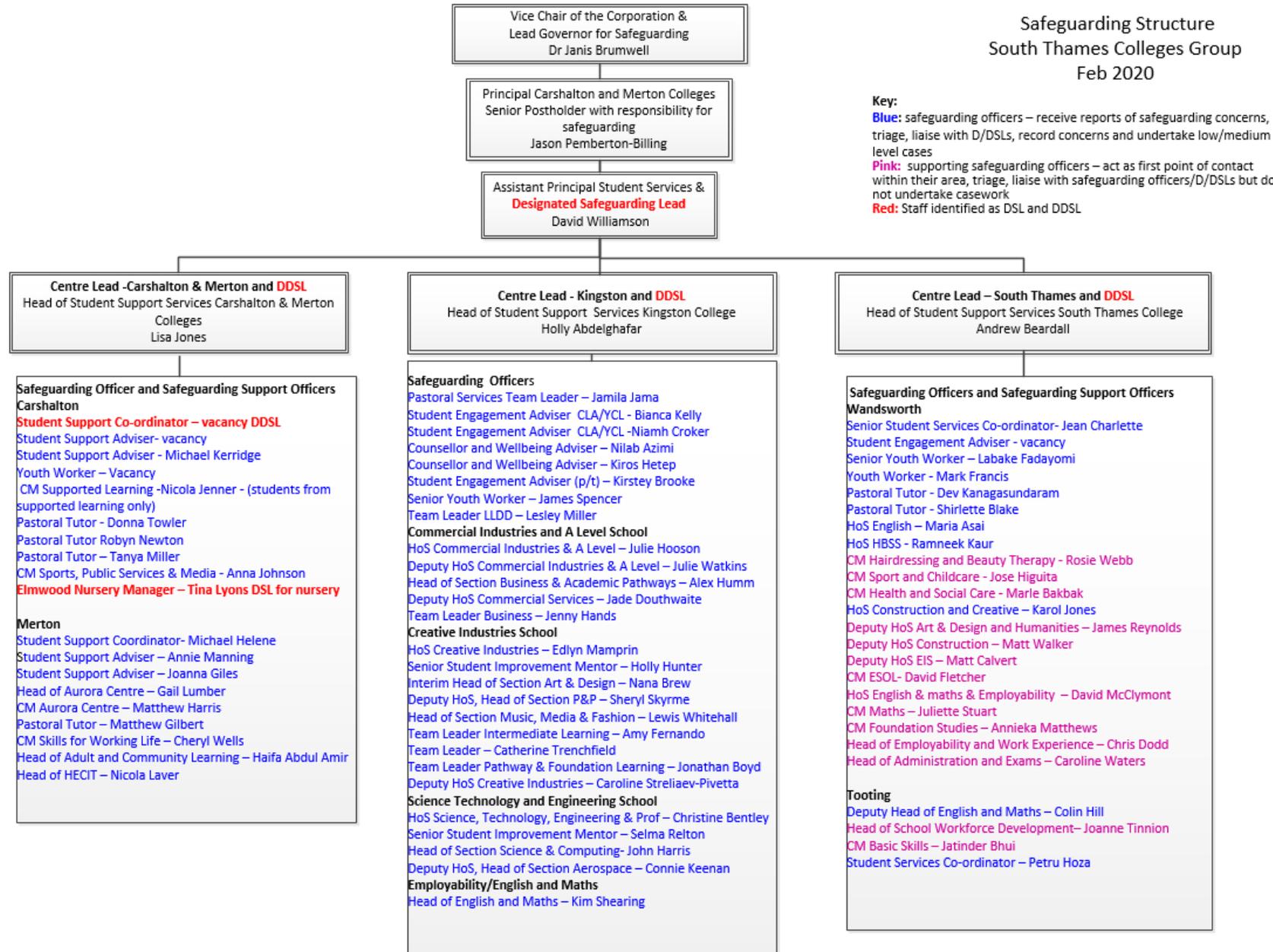
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STCG
SAFEGUARDING
REPORTING FLOWCHART
2019/20



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Safeguarding Structure
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Feb 2020



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Part One: Safeguarding information for all staff

URGENT: Once staff have read this document, they must go into CASCADE and tick the 'I have read the Part One: Safeguarding Information for all Staff'

What school and college staff should know and do:

A child centred and coordinated approach to safeguarding

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

The role of school and college staff

6. School and college staff are particularly important as they are in a position to identify concerns early, provide help for children, and prevent concerns from escalating.
7. **All** staff have a responsibility to provide a safe environment in which children can learn.
8. **All** staff should be prepared to identify children who may benefit from early help.¹ Early help means providing support as soon as a problem emerges at any point in a child's life, from the foundation years through to the teenage years.
9. **Any staff member** who has a concern about a child's welfare should follow the referral processes set out in paragraphs 36-47. Staff should expect to support social workers and other agencies following any referral.

¹ Detailed information on early help can be found in Chapter 1 of [Working Together to Safeguard Children](#). ⁴ The **Teachers' Standards** apply to: trainees working towards QTS; all teachers completing their statutory induction period (newly qualified teachers [NQTs]); and teachers in maintained schools, including maintained special schools, who are subject to the Education (School Teachers' Appraisal) (England) Regulations 2012.

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10. Every school and college should have a designated safeguarding lead who will provide support to staff to carry out their safeguarding duties and who will liaise closely with other services such as children's social care.
11. The designated safeguarding lead (and any deputies) are most likely to have a complete safeguarding picture and be the most appropriate person to advise on the response to safeguarding concerns.
12. The Teachers' Standards 2012 state that teachers (which includes head teachers) should safeguard children's wellbeing and maintain public trust in the teaching profession as part of their professional duties.⁴

What school and college staff need to know

13. **All staff should be aware of systems within their school or college which support safeguarding and these should be explained to them as part of staff induction. This should include the:**
 - a. child protection policy;
 - b. behaviour policy;²
 - c. staff behaviour policy (sometimes called a code of conduct);
 - d. safeguarding response to children who go missing from education; and
 - e. role of the designated safeguarding lead (including the identity of the designated safeguarding lead and any deputies).

Copies of policies and a copy of Part One of this document should be provided to staff at induction.

14. **All staff should receive appropriate safeguarding and child protection training which is regularly updated. In addition, all staff should receive safeguarding and child protection updates (for example, via email, e-bulletins and staff meetings), as required, and at least annually, to provide them with relevant skills and knowledge to safeguard children effectively.**
15. **All staff should be aware of their local early help³ process and understand their role in it.**
16. **All staff should be aware of the process for making referrals to children's social care and for statutory assessments under the Children Act 1989, especially section 17 (children in need) and section 47 (a child suffering, or likely to suffer, significant harm) that may follow a referral, along with the role they might be expected to play in such assessments.⁷**
17. **All staff should know what to do if a child tells them he/she is being abused or neglected. Staff should know how to manage the requirement to maintain an appropriate level of confidentiality. This means only involving those who need to be involved, such as the designated safeguarding lead (or a deputy) and children's social care. Staff should never promise a child that they would not tell anyone about a report of abuse, as this may ultimately not be in the best interests of the child.**

² All schools are required to have a behaviour policy (full details are [here](#)). If a college chooses to have a behaviour policy, it should be provided to staff as described above.

³ Detailed information on early help can be found in Chapter 1 of [Working Together to Safeguard Children](#).⁷ More information on statutory assessments is included at paragraph 42. Detailed information on statutory assessments can be found in Chapter 1 of [Working Together to Safeguard Children](#).

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What school and college staff should look out for:

Early help

18. **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 and has specific additional needs;
 - has special educational needs (whether or not they have a statutory Education, Health and Care Plan);
 - is a young carer;
 - is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups;
 - is frequently missing/goes missing from care or from home;
 - is at risk of modern slavery, trafficking or exploitation;
 - is at risk of being radicalised or exploited;
 - is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse;
 - is misusing drugs or alcohol themselves; has returned home to their family from care; and
 - is a privately fostered child.

Abuse and neglect

Knowing what to look for is vital to the early identification of abuse and neglect. **All** staff should be aware of indicators of abuse and neglect so that they are able to identify cases of children who may be in need of help or protection. If staff are unsure, they should **always** speak to the designated safeguarding lead (or deputy).

19. **All** school and college staff should be aware that abuse, neglect and safeguarding issues are rarely stand-alone events that can be covered by one definition or label. In most cases, multiple issues will overlap with one another.

Indicators of abuse and neglect

20. **Abuse:** a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children.
21. **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.
22. **Emotional abuse:** the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include

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interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning, or preventing the child from participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

23. **Sexual abuse:** involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education (see paragraph 27).
24. **Neglect:** the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy, for example, as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Safeguarding issues

25. **All staff** should have an awareness of safeguarding issues that can put children at risk of harm. Behaviours linked to issues such as drug taking, alcohol abuse, deliberately missing education and sexting (also known as youth produced sexual imagery) put children in danger.

Peer on peer abuse

26. **All staff** should be aware that children can abuse other children (often referred to as peer on peer abuse). This is most likely to include, but may not be limited to:
- bullying (including cyberbullying);
 - physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm;
 - sexual violence,⁴ such as rape, assault by penetration and sexual assault;
 - sexual harassment,⁵ such as sexual comments, remarks, jokes and online sexual harassment, which may be stand-alone or part of a broader pattern of abuse;

⁴ For further information about sexual violence see Annex A.

⁵ For further information about sexual harassment see Annex A.

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- e. upskirting,⁶ 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;
- f. sexting (also known as youth produced sexual imagery); and
- g. initiation/hazing type violence and rituals.

27. All staff should be clear as to the school's or college's policy and procedures with regards to peer on peer abuse.

Serious violence

28. All staff should be aware of indicators, which may signal that children are at risk from, or are involved with serious violent crime. These may include increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs.
29. All staff should be aware of the associated risks and understand the measures in place to manage these. Advice for schools and colleges is provided in the Home Office's [Preventing youth violence and gang involvement](#) and its [Criminal exploitation of children and vulnerable adults: county lines guidance](#)⁷.

Female Genital Mutilation

30. Whilst all staff should speak to the designated safeguarding lead (or deputy) with regard to any concerns about female genital mutilation (FGM), there is a specific **legal duty on teachers**.⁸ If a teacher, in the course of their work in the profession, discovers that an act of FGM appears to have been carried out on a girl under the age of 18, the teacher **must** report this to the police. See Annex A for further details.

Contextual safeguarding

31. Safeguarding incidents and/or behaviours can be associated with factors outside the school or college and/or can occur between children outside the school or college. All staff, but especially the designated safeguarding lead (and deputies) should be considering the context within which such incidents and/or behaviours occur. This is known as contextual safeguarding, which simply means assessments of children should consider whether wider environmental factors are present in a child's life that are a threat to their safety and/or welfare. Children's social care assessments should consider such factors so it is important that schools and colleges provide as much information as possible as part of the referral process. This will allow any assessment to consider all the available evidence and the full context of any abuse. Additional information regarding contextual safeguarding is available here: [Contextual Safeguarding](#).

⁶ For further information about 'upskirting' see Annex A.

⁷ For further information about violent crime see Annex A.

⁸ Under Section 5B (11) (a) of the Female Genital Mutilation Act 2003, "teacher" means, in relation to England, a person within section 141A (1) of the Education Act 2002 (persons employed or engaged to carry out teaching work at schools and other institutions in England).

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Additional information and support

32. Departmental advice [What to Do if You Are Worried a Child is Being Abused - Advice for Practitioners](#) provides more information on understanding and identifying abuse and neglect. Examples of potential indicators of abuse and neglect are highlighted throughout the advice and will be particularly helpful for school and college staff. The [NSPCC](#) website also provides useful additional information on abuse and neglect and what to look out for.
33. **Annex A** contains important additional information about specific forms of abuse and safeguarding issues. School and college leaders and those staff who work directly with children should read the annex.

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

34. Staff working with children are advised to maintain an attitude of **'it could happen here'** where safeguarding is concerned. When concerned about the welfare of a child, staff should always act in the **best** interests of the child.
35. If staff have **any concerns** about a child's welfare, they should act on them immediately. See page 12 for a flow chart setting out the process for staff when they have concerns about a child.
36. If staff have a concern, they should follow their own organisation's child protection policy and speak to the designated safeguarding lead (or deputy).
37. Options will then include:
 - managing any support for the child internally via the school's or college's own pastoral support processes;
 - an early help assessment;⁹ or
 - a referral for statutory services,¹⁰ for example as the child might be in need, is in need or suffering or likely to suffer harm.
38. The designated safeguarding lead or a deputy should always be available to discuss safeguarding concerns. If in exceptional circumstances, the designated safeguarding lead (or deputy) is not available, this should not delay appropriate action being taken. Staff should consider speaking to a member of the senior leadership team and/or take advice from local children's social care. In these circumstances, any action taken should be shared with the designated safeguarding lead (or deputy) as soon as is practically possible.
39. Staff should not assume a colleague or another professional will take action and share information that might be critical in keeping children safe. They should be mindful that early information sharing is vital for effective identification, assessment and allocation of appropriate service provision.

⁹ Further information on early help assessments, provision of early help services and accessing services is in Chapter 1 of [Working Together to Safeguard Children](#).

¹⁰ Chapter 1 of [Working Together to Safeguard Children](#) sets out that the safeguarding partners should publish a threshold document that should include the criteria, including the level of need, for when a case should be referred to local authority children's social care for assessment and for statutory services under section 17 and 47. Local authorities, with their partners, should develop and publish local protocols for assessment. A local protocol should set out clear arrangements for how cases will be managed once a child is referred into local authority children's social care.

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Information Sharing: Advice for Practitioners Providing Safeguarding Services to Children, Young People, Parents and Carers supports staff who have to make decisions about sharing information. This advice includes the seven golden rules for sharing information and considerations with regard to the Data Protection Act 2018 and General Data Protection Regulation (GDPR). If in any doubt about sharing information, staff should speak to the designated safeguarding lead or a deputy. Fears about sharing information **must not** be allowed to stand in the way of the need to promote the welfare, and protect the safety of children.

Early help

40. If early help is appropriate, the designated safeguarding lead (or deputy) will generally lead on liaising with other agencies and setting up an inter-agency assessment as appropriate. Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead practitioner. Any such cases should be kept under constant review and consideration given to a referral to children's social care for assessment for statutory services, if the child's situation does not appear to be improving or is getting worse.

Statutory assessments

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

Children in need

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

Children suffering or likely to suffer significant harm

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

42. The online tool **Report Child Abuse to Your Local Council** directs to the relevant local children's social care contact number.

What will the local authority do?

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

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- the child requires immediate protection and urgent action is required;
- the child is in need, and should be assessed under section 17 of the Children Act 1989;
- there is reasonable cause to suspect the child is suffering or likely to suffer significant harm, and whether enquiries must be made and the child assessed under section 47 of the Children Act 1989;
- any services are required by the child and family and what type of services
- further specialist assessments are required to help the local authority to decide what further action to take;
- to see the child as soon as possible if the decision is taken that the referral requires further assessment.

44. The referrer should follow up if this information is not forthcoming.
45. If social workers decide to carry out a statutory assessment, staff should do everything they can to support that assessment (supported by the designated safeguarding lead (or deputy) as required).
46. If, after a referral, the child's situation does not appear to be improving, the referrer should consider following local escalation procedures to ensure their concerns have been addressed and, most importantly, that the child's situation improves.

Record keeping

47. All concerns, discussions and decisions made, and the reasons for those decisions, should be recorded in writing. If in doubt about recording requirements, staff should discuss with the designated safeguarding lead (or deputy).

Why is all of this important?

48. It is important for children to receive the right help at the right time to address risks and prevent issues escalating. Research and serious case reviews have repeatedly shown the dangers of failing to take effective action.¹¹ Examples of poor practice include:
- failing to act on and refer the early signs of abuse and neglect;
 - poor record keeping;
 - failing to listen to the views of the child;
 - failing to re-assess concerns when situations do not improve;
 - not sharing information;
 - sharing information too slowly; and
 - a lack of challenge to those who appear not to be taking action.

What school and college staff should do if they have concerns about another staff member who may pose a risk of harm to children

49. If staff have safeguarding concerns, or an allegation is made about another member of staff (including volunteers) posing a risk of harm to children, then:

¹¹ An analysis of serious case reviews can be found at [Serious case reviews, 2011 to 2014](#).

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- this should be referred to the head teacher or principal;
- where there are concerns/allegations about the head teacher or principal, this should be referred to the chair of governors, chair of the management committee or proprietor of an independent school; and
- in the event of concerns/allegations about the head teacher, where the head teacher is also the sole proprietor of an independent school, allegations should be reported directly to the designated officer(s) at the local authority.
(Further details can be found in Part four of this guidance).

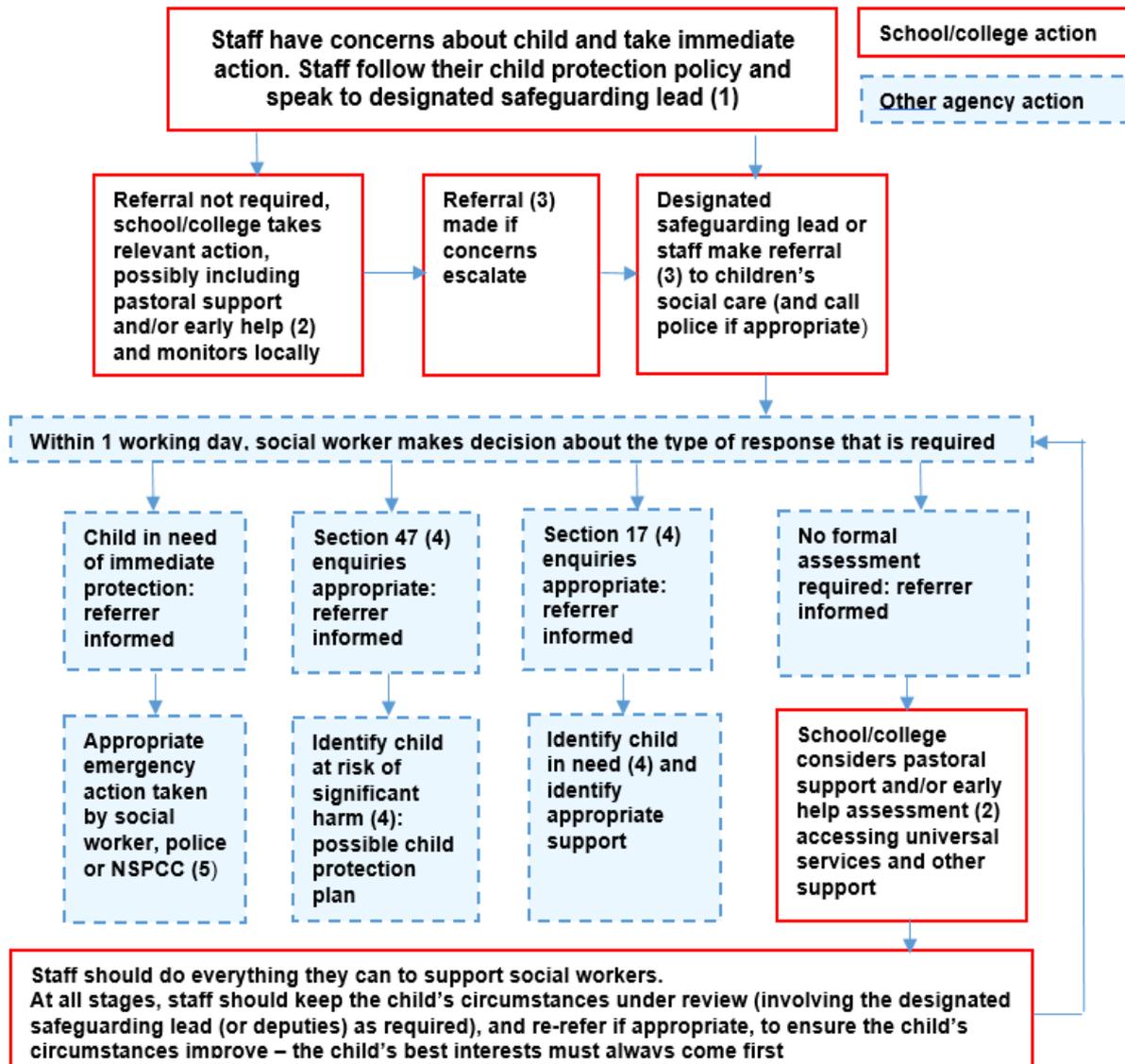
What school or college staff should do if they have concerns about safeguarding practices within the school or college

50. All staff and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in the school's or college's safeguarding regime, and know that such concerns will be taken seriously by the senior leadership team.
51. Appropriate whistleblowing procedures should be put in place for such concerns to be raised with the school's or college's senior leadership team.
52. Where a staff member feels unable to raise an issue with their employer, or feels that their genuine concerns are not being addressed, other whistleblowing channels may be open to them:
 - general guidance on whistleblowing can be found via: [Advice on Whistleblowing](#); and
 - the [NSPCC's what you can do to report abuse dedicated helpline](#) is available as an alternative route for staff who do not feel able to raise concerns regarding child protection failures internally or have concerns about the way a concern is being handled by their school or college. Staff can call 0800 028 0285 – line is available from 8:00 AM to 8:00 PM, Monday to Friday and email: help@nspcc.org.uk.

URGENT: Once staff have read this document, they must go into CASCADE and tick the 'I have read the Part One: Safeguarding Information for all Staff'

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Actions where there are concerns about a child



(1) In cases which also involve a concern or an allegation of abuse against a staff member, see Part Four of this guidance.

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

(3) Referrals should follow the process set out in the local threshold document and local protocol for assessment. Chapter one of Working Together to Safeguard Children.

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

(5) This could include applying for an Emergency Protection Order (EPO).

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Annex A - Further information about specific forms of abuse and safeguarding issues

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

As per Part one of this guidance, if staff have any concerns about a child's welfare, they should act on them immediately. They should follow their own organisation's child protection policy and speak to the designated safeguarding lead (or deputy).

Where a child is suffering, or is likely to suffer from harm, it is important that a referral to children's social care (and if appropriate the police) is made immediately.

Children and 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 **5-11-year olds** and **12-17 year olds**.

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 missing from education

All staff should be aware that children going missing from education, 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. 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 risk and to help prevent the risks of a child going missing in future. Staff should be aware of their school's or college's unauthorised absence and children missing from education procedures.

Children with family members in prison

Approximately 200,000 children in England and Wales have a parent sent to prison each year. These children are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. **NICCO** provides information designed to support professionals working with offenders and their children, to help mitigate negative consequences for those children.

Child sexual exploitation

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

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- 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;
- can still be abuse even if the sexual activity appears consensual;
- can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity;
- can take place in person or via technology, or a combination of both;
- can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence;
- 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);
- can be perpetrated by individuals or groups, males or females, and children or adults. The abuse can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse; and
- is typified by some form of power imbalance in favour of those perpetrating the abuse. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources.

Some of the following signs may be indicators of child sexual exploitation:

- children who appear with unexplained gifts or new possessions;
- children who associate with other young people involved in exploitation;
- children who have older boyfriends or girlfriends;
- children who suffer from sexually transmitted infections or become pregnant;
- 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 criminal exploitation: county lines

Criminal exploitation of children is a geographically widespread form of harm that is a typical feature of county lines criminal activity: drug networks or gangs groom and exploit children and young people to carry drugs and money from urban areas to suburban and rural areas, market and seaside towns. Key to identifying potential involvement in county lines are missing episodes, when the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism¹⁵ should be considered. Like other forms of abuse and exploitation, county lines exploitation:

- can affect any child or young person (male or female) under the age of 18 years;
- can affect any vulnerable adult over the age of 18 years;
- can still be exploitation even if the activity appears consensual;
- can involve force and/or enticement-based methods of compliance and is often accompanied by violence or threats of violence;
- can be perpetrated by individuals or groups, males or females, and young people or adults; and
- is typified by some form of power imbalance in favour of those perpetrating the exploitation. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, cognitive ability, physical strength, status, and access to economic or other resources.

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Domestic abuse

The cross-government definition of domestic violence and abuse is:

Any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass, but is not limited to:

- psychological;
- physical;
- sexual, financial and
- emotional

Exposure to 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. Domestic abuse affecting young people can also occur within their personal relationships, as well as in the context of their home life.

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

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

Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The designated safeguarding lead (and any deputies) should be aware of contact details and referral routes in to the Local Housing Authority so they can raise/progress concerns at the earliest opportunity. Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property. Whilst referrals and or discussion with the Local Housing Authority should be progressed as appropriate, and in accordance with local procedures, this does not, and should not, replace a referral into children's social care where a child has been harmed or is at risk of harm.

The Homelessness Reduction Act 2017 places a new legal duty on English councils so that everyone who is homeless or at risk of homelessness will have access to meaningful help including an assessment of their needs and circumstances, the development of a personalised housing plan, and work to help them retain their accommodation or find a new place to live. The following factsheets usefully summarise the new duties: **Homeless Reduction Act Factsheets**. The new duties shift focus to early intervention and encourage those at risk to seek support as soon as possible, before they are facing a homelessness crisis.

In most cases school and 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. Children's services will be the lead agency for these young people and the designated safeguarding lead (or a deputy) should ensure appropriate referrals are made based on the child's and/or require accommodation.

The department and the Ministry of Housing, Communities and Local Government have published joint statutory **guidance on the provision of accommodation for 16 and 17 year olds who may be homeless** and/or require accommodation.

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So-called 'honour-based' violence (including Female Genital Mutilation and Forced Marriage)

So-called 'honour-based' violence (HBV) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing. Abuse committed in the context of preserving "honour" often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take. All forms of HBV are abuse (regardless of the motivation) and should be handled and escalated as such. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBV, or already having suffered HBV.

Actions

If staff have a concern regarding a child that might be at risk of HBV or who has suffered from HBV, they should speak to the designated safeguarding lead (or deputy). As appropriate, they will activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and children's social care. Where FGM has taken place, since 31 October 2015 there has been a mandatory reporting duty placed on **teachers** that requires a different approach (see following section).

FGM

FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences.

FGM mandatory reporting duty for teachers

Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a statutory duty upon **teachers** along with regulated Under Section 5B(11)(a) of the Female Genital Mutilation Act 2003, "teacher" means, in relation to England, a person within section 141A(1) of the Education Act 2002 (persons employed or engaged to carry out teaching work at schools and other institutions in England).

Health and social care professionals in England and Wales, report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Those failing to report such cases will face disciplinary sanctions. It will be rare for teachers to see visual evidence, and they should **not** be examining pupils or students, but the same definition of what is meant by "to discover that an act of FGM appears to have been carried out" is used for all professionals to whom this mandatory reporting duty applies. Information on when and how to make a report can be found at: [**Mandatory reporting of female genital mutilation procedural information.**](#)

Teachers **must** personally report to the police cases where they discover that an act of FGM appears to have been carried out. Unless the teacher has good reason not to, they should still consider and discuss any such case with the school's or college's designated safeguarding lead (or deputy) and involve children's social care as appropriate. The duty does not apply in relation to at risk or suspected cases (i.e. where the teacher does not discover that an act of FGM appears to have been carried out, either through disclosure by the victim or visual evidence) or in cases where the woman is 18 or over. In these cases, teachers should follow local safeguarding procedures. The following is a useful summary of the FGM mandatory reporting duty: [**FGM Fact Sheet.**](#)

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Forced marriage

Forcing a person into a marriage is a crime in England and Wales. A 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 communities use religion and culture as a way to coerce a person into marriage. Schools and colleges can play an important role in safeguarding children from forced marriage.

The Forced Marriage Unit has published [statutory guidance](#) and [Multi-agency guidelines](#), pages 35-36 of which focus on the role of schools and colleges. School and college staff can contact the Forced Marriage Unit if they need advice or information: Contact: 020 7008 0151 or emailfmu@fco.gov.uk.

Section 5B(6) of the Female Genital Mutilation Act 2003 states teachers need not report a case to the police if they have reason to believe that another teacher has already reported the case.

Preventing radicalisation

Children are vulnerable to extremist ideology and radicalisation. Similar to protecting children from other forms of harms and abuse, protecting children from this risk should be a part of a schools' or colleges' safeguarding approach.

Extremism Radicalisation is the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces. This refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.

- As defined in the Government's Counter Extremism Strategy.
- As defined in the Revised Prevent Duty Guidance for England and Wales.
- According to the Prevent duty guidance 'having due regard' means that the authorities should place an appropriate amount of weight on the need to prevent people being drawn into terrorism when they consider all the other factors relevant to how they carry out their usual functions.
- "Terrorism" for these purposes has the same meaning as for the Terrorism Act 2000 (section 1(1) to (4) of that Act).

There is no single way of identifying whether a child is likely to be susceptible to an extremist ideology. Background factors combined with specific influences such as family and friends may contribute to a child's vulnerability. Similarly, radicalisation can occur through many different methods (such as social media) and settings (such as the internet).

However, it is possible to protect vulnerable people from extremist ideology and intervene to prevent those at risk of radicalisation being radicalised. As with other safeguarding risks, staff should be alert to changes in children's behaviour, which could indicate that they may be in need of help or protection. Staff should use their judgement in identifying children who might be at risk of radicalisation and act proportionately which may include the designated safeguarding lead (or deputy) making a referral to the Channel programme.

The Prevent duty

All schools and colleges are subject to a duty under section 26 of the Counter-Terrorism and Security Act 2015 (the CTSA 2015), in the exercise of their functions, to have "due regard to the need to prevent people from being drawn into terrorism". This duty is known as the Prevent duty.

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The Prevent duty should be seen as part of schools' and colleges' wider safeguarding obligations. Designated safeguarding leads and other senior leaders should familiarise themselves with the revised **Prevent duty guidance: for England and Wales**, especially paragraphs 57-76, which are specifically concerned with schools (and also covers childcare). The guidance is set out in terms of four general themes: Risk assessment, working in partnership, staff training, and IT policies.

Additional support

The department has published advice for schools on the **Prevent duty**. The advice is intended to complement the Prevent guidance and signposts other sources of advice and support.

There is additional guidance: **Prevent duty guidance: for further education institutions in England and Wales** that applies to colleges.

Educate Against Hate, a website launched by the Her Majesty's Government has been developed to support and equip school and college leaders, teachers, and parents with information, tools and resources (including on the promotion of fundamental British values) to help recognise and address extremism and radicalisation in young people. The platform provides information on and access to training resources for teachers, staff and school and college leaders, some of which are free such as Prevent e-learning, via the Prevent Training catalogue.

Channel

Channel is a programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. It provides a mechanism for schools to make referrals if they are concerned that an individual might be vulnerable to radicalisation. An individual's engagement with the programme is entirely voluntary at all stages. Guidance on Channel is available at: **Channel guidance**, and a Channel awareness e-learning programme is available for staff at: **Channel General Awareness**.

The school's or college's designated safeguarding lead (and any deputies) should be aware of local procedures for making a Channel referral. As a Channel partner, the school or college may be asked to attend a Channel panel to discuss the individual referred to determine whether they are vulnerable to being drawn into terrorism and consider the appropriate support required.

Peer on peer abuse

Children can abuse other children. This is generally referred to as peer on peer abuse and can take many forms. This can include (but is not limited to) bullying (including cyberbullying); sexual violence and sexual harassment; physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm; sexting and initiating/hazing type violence and rituals.

Sexual violence and sexual harassment between children in schools and colleges

Context

Sexual violence and sexual harassment can occur between two children of **any** age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and offline (both physical and verbal) and are never acceptable. It is important that **all** victims are taken seriously and offered appropriate support. Staff should be aware that some groups are potentially more at risk. Evidence shows girls, children with SEND and LGBT children are at greater risk.

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Staff should be aware of the importance of:

- making clear that sexual violence and sexual harassment is not 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”; and
- challenging behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, flicking bras and lifting up skirts, .
- Dismissing or tolerating such behaviours risks normalising them.

What is Sexual violence and sexual harassment?

Sexual violence

It is important that school and college staff are aware of sexual violence and the fact children can, and sometimes do, abuse their peers in this way. When referring to sexual violence we are referring to sexual violence offences under the Sexual Offences Act 2003 as described below ([Legislation.gov.uk](http://legislation.gov.uk)):

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.

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

It is important school and college staff (and especially designated safeguarding leads and their deputies) understand consent. This will be especially important if a child is reporting they have been raped. More information: **What is consent?**

PSHE Teaching about consent from the PSHE association provides advice and lesson plans to teach consent at Key stage 3 and 4.

Sexual harassment

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.

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

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

Sexual harassment and/or sexual violence may include:

- non-consensual sharing of sexual images and videos;
- sexualised online bullying;
- unwanted sexual comments and messages, including, on social media;
- sexual exploitation; coercion and threats; and
- upskirting.

Upskirting

‘Upskirting’ 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. It is now a criminal offence.

The response to a report of sexual violence or sexual harassment

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.

If staff have a concern about a child or a child makes a report to them, they should follow the referral process as set out from paragraph 22 in Part one of this guidance. As is always the case, if staff are in any doubt as to what to do they should speak to the designated safeguarding lead (or a deputy).

Project deSHAME from Childnet provides useful research, advice and resources regarding online sexual harassment. Additional information about **the upskirting law** is available.

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Further information

Other relevant guidance

Abuse

- What to do if you are worried a child is being abused – DfE advice
- Faith based abuse: National Action Plan – DfE advice
- Domestic abuse: Various information / guidance – Home Office
- Relationship abuse: disrespect nobody – Home Office

Bullying

- Preventing bullying including cyberbullying – DfE advice

Children and the courts

- Advice for 5 to 11 year olds witnesses in criminal courts – Ministry of Justice
- Advice for 12 to 17 year olds witnesses in criminal courts – Ministry of Justice

Children missing from education, home or care

- Children missing education – DfE statutory guidance
- Child missing from home or care – DfE statutory guidance
- Children and adults missing strategy – Home Office

Children with family members in prison

- National Information Centre on Children of Offenders – Barnardo's in partnership with Her Majesty's Prison and Probation Service (HMPPS)

Child Exploitation

- Child sexual exploitation: guide for practitioners – DfE guide
- Trafficking: safeguarding children – DfE and Home Office Advice
- County Lines: criminal exploitation of children and vulnerable adults – Home Office

Drugs

- Drugs: advice for schools – DfE and Association of Chief Police Officers (ACPO) advice
- Drugs strategy 2017 – Home Office
- Information and advice on drugs – Talk to Frank website
- ADEPIS platform sharing information and resources for schools: covering drug (and alcohol) prevention – Website developed by Mentor UK

(so called) Honour Based Violence

- Female genital mutilation: information and resources – Home Office
- Female genital mutilation: multi agency statutory guidance – DfE, Department of Health and Social Care (DH) and Home Office
- Forced marriage: statutory guidance and government advice – Foreign Commonwealth Office and Home Office

Health and wellbeing

- Fabricated or induced illness: safeguarding children – DfE, Department for Health and Social Care (DH) and Home Office
- Rise Above: Free PSHE resources on health, wellbeing and resilience – Public Health England
- Medical conditions: supporting pupils at school – DfE statutory guidance

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- Mental health and behaviour – DfE Advice

Homelessness

- Homelessness: How local authorities should exercise their functions – Ministry of Housing, Communities and Local Government (MHCLG)

Online

- Sexting: responding to incidents and safeguarding children – UK council for Internet Safety

Private fostering

- Private fostering: local authorities – DfE statutory guidance

Radicalisation

- Prevent duty guidance – Home Office
- Prevent duty advice for schools – DfE advice
- Educate Against Hate Website – DfE and Home Office

Violence

- Gangs and youth violence: advice for schools and colleges – Home Office
- Ending violence against women and girls 2016 to 2020 strategy – Home Office
- Violence against women and girls: national statement of expectations for victims – Home Office
- Sexual violence and sexual harassment between children in schools and colleges – DfE advice
- Serious violence strategy – Home Office

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Annex B: Role of the Designated Safeguarding Lead

Governing bodies, proprietors and management committees should ensure an appropriate **senior member** of staff, from the school or college **leadership team**, is appointed to the role of designated safeguarding lead.¹² The designated safeguarding lead should take **lead responsibility** for safeguarding and child protection (including online safety). This should be explicit in the role holder's job description. This person should have the appropriate status and authority within the school to carry out the duties of the post. They should be given the time, funding, training, resources and support to provide advice and support to other staff on child welfare and child protection matters, to take part in strategy discussions and inter-agency meetings, and/or to support other staff to do so, and to contribute to the assessment of children.

Deputy designated safeguarding leads

It is a matter for individual schools and colleges as to whether they choose to have one or more deputy designated safeguarding leads. Any deputies should be trained to the same standard as the designated safeguarding lead and the role should be explicit in their job description. Whilst the activities of the designated safeguarding lead can be delegated to appropriately trained deputies, the ultimate **lead responsibility** for child protection, as set out above, remains with the designated safeguarding lead, this **lead responsibility** should not be delegated.

Manage referrals

The designated safeguarding lead is expected to:

- refer cases of suspected abuse to the local authority children's social care as required;
- support staff who make referrals to local authority children's social care;
- refer cases to the Channel programme where there is a radicalisation concern as required;
- support staff who make referrals to the Channel programme;
- refer cases where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service as required; and
- refer cases where a crime may have been committed to the Police as required.

Work with others

The designated safeguarding lead is expected to:

- act as a point of contact with the three safeguarding partners;
- liaise with the head teacher or principal to inform him or her of issues- especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations;
- as required, liaise with the "case manager" (as per Part four) and the designated officer(s) at the local authority for child protection concerns in cases which concern a staff member;
- liaise with staff (especially pastoral support staff, school nurses, IT Technicians, and SENCOs or the named person with oversight for SEN in a college) on matters of safety and safeguarding (including

¹² When a school has a sole proprietor rather than a governing body, appropriate steps should be taken to ensure that the member of the senior leadership team who is appointed as designated safeguarding lead (DSL) is able to discharge that role with sufficient independence, particularly in relation to any allegations involving the proprietor or members of the proprietor's family. This may involve including in the appointment as DSL, written confirmation that part of the duties of the post involve contacting the Local Authority Designated Officer on any matter that the DSL considers cannot be properly dealt with internally. Consideration could also be given to providing the DSL with access to external advice from an appropriate company or legal service.

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online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies; and act as a source of support, advice and expertise for all staff.

Training

The designated safeguarding lead (and any deputies) should undergo training to provide them with the knowledge and skills required to carry out the role. This training should be updated at least every two years. The designated safeguarding lead should undertake Prevent awareness training.

In addition to the formal training set out above, their knowledge and skills should be refreshed (this might be via e-bulletins, meeting other designated safeguarding leads, or simply taking time to read and digest safeguarding developments) at regular intervals, as required, and at least annually, to allow them to understand and keep up with any developments relevant to their role so they:

- understand the assessment process for providing early help and statutory intervention, including local criteria for action and local authority children's social care referral arrangements.¹³
 - have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so;
- ensure each member of staff has access to, and understands, the school's or college's child protection policy and procedures, especially new and part time staff;
- are alert to the specific needs of children in need, those with special educational needs and young carers;¹⁴
- understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the General Data Protection Regulation.
- understand the importance of information sharing, both within the school and college, and with the three safeguarding partners, other agencies, organisations and practitioners.
- are able to keep detailed, accurate, secure written records of concerns and referrals;
- understand and support the school or college with regards to the requirements of the Prevent duty and are able to provide advice and support to staff on protecting children from the risk of radicalisation;
- are able to understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online at school or college;
- can recognise the additional risks that children with SEN and disabilities (SEND) face online, for example, from online bullying, grooming and radicalisation and are confident they have the capability to support SEND children to stay safe online;
- obtain access to resources and attend any relevant or refresher training courses; and
- encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the school or college may put in place to protect them.

¹³ Full details in Chapter one of [Working Together to Safeguard Children](#).

¹⁴ Section 17(10) Children Act 1989: those unlikely to achieve a reasonable standard of health and development without local authority services, those whose health and development is likely to be significantly impaired without the provision of such services, or disabled children.

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Raise Awareness

The designated safeguarding lead should:

- ensure the school's or college's child protection policies are known, understood and used appropriately;
- ensure the school's or college's child protection policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with governing bodies or proprietors regarding this;
- ensure the child protection policy is available publicly and parents are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the school or college in this; and
- link with the safeguarding partner arrangements to make sure staff are aware of any training opportunities and the latest local policies on local safeguarding arrangements.

Child protection file

Where children leave the school or college the designated safeguarding lead should ensure their child protection file is transferred to the new school or college as soon as possible. This should be transferred separately from the main pupil file, ensuring secure transit, and confirmation of receipt should be obtained. Receiving schools and colleges should ensure key staff such as designated safeguarding leads and SENCOs or the named person with oversight for SEN in colleges, are aware as required.

In addition to the child protection file, the designated safeguarding lead should also consider if it would be appropriate to share any information with the new school or college in advance of a child leaving. For example, information that would allow the new school or college to continue supporting victims of abuse and have that support in place for when the child arrives.

Availability

During term time the designated safeguarding lead (or a deputy) should always be available (during school or college hours) for staff in the school or college to discuss any safeguarding concerns. Whilst generally speaking the designated safeguarding lead (or deputy) would be expected to be available in person, it is a matter for individual schools and colleges, working with the designated safeguarding lead, to define what "available" means and whether in exceptional circumstances availability via phone and or Skype or other such media is acceptable.

It is a matter for individual schools and colleges and the designated safeguarding lead to arrange adequate and appropriate cover arrangements for any out of hours/out of term activities.