



# Child Protection and Safeguarding Policy

**Learning together for success and progression**

*Approved by Academy Trust Board: 9 December 2019*

# Child Protection and Safeguarding Policy

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| Trustee Committee Responsible:  | Curriculum and Quality                           |
| Nominated Lead Member of Staff: | Assistant Principal – Staff and Student Guidance |
| Status and Review Cycle:        | Annual   |
| Current Review:                 | December 2019                                    |
| Next Review Date:               | December 2020                                    |

## Safeguarding Statement and Aims

Godalming College places safeguarding at the heart of our work with young people: all staff and trustees have a moral and statutory responsibility to safeguard and promote the welfare of all students.

The welfare of our students is paramount; all staff and trustees believe in providing a caring, positive, safe and stimulating environment where young people are respected and valued and that promotes the social, physical and moral development of every student. We are alert to the signs of abuse, neglect and exploitation, and follow our procedures to ensure that students receive effective support, protection and justice. The College will always ensure that the student's wishes and feelings are taken into account and will always act in the best interests of the student. We liaise with all relevant services both to promote the welfare of students, to protect them from harm and to secure support from external agencies where appropriate.

All staff and trustees recognise their responsibility in protecting our students from harm regardless of age, gender, culture, language, race, ability, sexual identity or religion.

## Statutory responsibilities

The Children Act 1989 places a duty on education providers to take steps to protect children in appropriate circumstances and gives certain powers to the Policy so they are able to protect children from abuse.

### Key Personnel

The Designated Safeguarding Lead (DSL) is the **Assistant Principal**.

The Deputy DSLs are the four **Senior Tutors** and the **Head of Learning Support** who are trained to the same level as the DSL.

The Safeguarding Team is further supported by the **Link Trustee for Safeguarding**, the **Principal** and the **Chair of Trustees**.

## Policy Statement

This Policy has been developed in accordance with the principles established by the Children Acts 1989 and 2004; the Education Act 2002, and in line with statutory guidance: 'Working Together to Safeguard Children' 2018, Revised Safeguarding Statutory Guidance 'Framework for the Assessment of Children in Need and their Families' 2000, 'What to do if You are Worried a Child is Being Abused' 2015.

The Policy also reflects, both statutory guidance 'Keeping Children Safe in Education' 2019 (KCSIE) and Surrey Safeguarding Children Partnership (SSCP) Procedures.

We recognise that:

- students have a right to feel safe and secure and that they cannot learn effectively unless they do so
- all students have a right to be protected from harm and abuse
- all staff and trustees have a role in the prevention of harm and abuse and an equal responsibility to act immediately on any suspicion or disclosure that may indicate a young person is at risk of harm, either in the College or in the community, taking into account contextual safeguarding, in accordance with statutory guidance
- working in partnership with other agencies protects students and reduces risk and so we will engage in partnership working to protect and safeguard students.

Whilst the College will work openly with parents as far as possible, it reserves the right to contact Social Care or the Police, without notifying parents, if this is believed to be in the student's best interests.

## Policy Aims

- To demonstrate the College's commitment with regard to safeguarding and child protection
- To raise the awareness of all staff and trustees of their responsibilities to safeguard students
- To ensure consistent excellent practice across the College
- To provide robust college systems and procedures that are followed by all members of the College community in cases of suspected abuse
- To develop and promote effective working relationships with other agencies, in particular Early Help providers, the Police, Health and Social Care
- To establish procedures for reporting and dealing with allegations of abuse against members of staff
- To ensure the safe recruitment of staff



## Terminology

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

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

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

**Early Help** means providing support as soon as additional needs emerge at any point in a child's life.

**Staff** refers to all those working for or on behalf of the College, full or part time, temporary or permanent, in either a paid or voluntary capacity.

**Child(ren)** includes everyone under the age of 18. On the whole, this will apply to students of our College; however the policy will extend to students from other establishments.

**Parents** refers to birth parents and other adults who are in a parenting role, for example step-parents, foster carers and adoptive parents.

**Social Care** refers to Children's Services in the area in which the child is resident, unless a child is a Child Looked After then this will be the Children's Services in their home authority.

**MAP** refers to the Surrey Multi-Agency Partnership.

**C-SPA** refers to the Children's Single Point of Access and the Child Protection Consultation Line.

## Roles and Responsibilities

### Trustees

The Board of Trustees ensures that the College has appropriate policies and procedures in place to safeguard and protect student welfare. This includes the Child Protection and Safeguarding Policy and the Staff Code of Conduct both of which are updated regularly.

The Safeguarding Link Trustee will take a leading role within the Board in ensuring that the Trustees carry out their responsibilities outlined above. They will report regularly on Safeguarding and Child Protection to the Board.

### Senior Management

The Principal will ensure that policies and procedures, adopted by the Board of Trustees and particularly concerning referrals of cases of suspected abuse and neglect, are followed by all staff.

The Assistant Principal (Designated Safeguarding Lead) takes lead responsibility for safeguarding and child protection in the College.

### Safeguarding Team

The Safeguarding Team consists of the Designated Safeguarding Leads and 5 Deputy Designated Safeguarding Leads. This team is signposted across College and all students and staff are made aware of these members of staff.

### All Staff

All staff have a duty to safeguard students and a responsibility to keep themselves up to date with the latest guidance. A member of staff who is approached by a student should listen positively and try to reassure them. They cannot promise complete confidentiality and should explain that they may need to pass information to other professionals to help keep the student or other students safe. The degree of confidentiality should always be governed by the need to protect the student.

Additional consideration needs to be given to students with communication difficulties and for those whose preferred language is not English. It is important to communicate with them in a way that is appropriate to their age, understanding and preference.

All staff should know who the DSL is and who the rest of the College Safeguarding team are, in order to make contact with any safeguarding concern.

### **Training for Staff**

- The DSL and deputies will receive training which gives them the knowledge and skills needed to fulfil their responsibilities and will undertake update training at 2-yearly intervals in line with statutory requirements
- All new members of staff and Trustees will be made aware of the College's Child Protection and Safeguarding Policy and procedures during their induction into the College
- All existing staff and Trustees undertake Child Protection and Safeguarding training on an annual basis, to ensure latest updates from the Department for Education Keeping Children Safe in Education

### **Monitoring and Review**

- The Link Trustee reports to the Board through a standing agenda item
- There is an annual Safeguarding SAR, which is reviewed by the Link Trustee
- The College Safeguarding Team meet every three weeks
- This Policy is reviewed and updated on an annual basis

### **Referral**

We reserve the right to act in the best interests of the young person and we will always work to include the student in decision making and referrals. Wherever possible this will include working with parents, but we may have to refer to agencies such as the C-SPA without consulting with parents first.

- We recognise that staff who have become involved with a child who has suffered harm, or appears to be likely to suffer harm, may find the situation stressful and upsetting
- We will support such staff by providing an opportunity to talk through their anxieties with a DSL and to seek further support as appropriate

### **Record Keeping**

- An accurate record should be made and kept until the student's 25<sup>th</sup> birthday whenever there is a concern about a student being at risk or in need of safeguarding.

### **Confidentiality**

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

All staff must be aware that they have a professional responsibility to share information with other agencies in order to safeguard students and that the Data Protection Act 1998 and General Data Protection.

Regulations are not a barrier to sharing information where a failure to do so would place a young person at risk of harm. There is a lawful basis for child protection concerns to be shared with agencies who have a statutory duty for child protection.

All staff must be aware that they cannot promise a student to keep secrets which might compromise the student's safety or wellbeing. However, staff are aware that matters relating to child protection and safeguarding are personal to students and families. In this respect, they are confidential and the DSLs or Principal will only disclose information about a student to other members of staff on a need to know basis.

All staff will always undertake to gain parent/carers' consent to refer a student to Social Care unless to do so could put the student at greater risk of harm, or impede a criminal investigation.

As a College we will educate and encourage students to be safe as follows:

- we will promote a caring, safe and positive environment within the College
- we will encourage self-esteem and self-assertiveness, through the curriculum and through positive relationships within the College community
- we will ensure students are taught to understand and manage risk through all aspects of college life. This includes online safety
- we will respond sympathetically to any requests for time out to deal with distress and anxiety
- we will offer details of helplines, counselling or other avenues of internal and external support
- we will liaise and work in partnership with other support services and agencies involved in Early Help and the safeguarding of students
- we will notify Social Care immediately if there is a significant concern
- we will provide continuing support to a student about whom there have been concerns who leaves the College by ensuring that information is shared under confidential cover to the students' new setting and ensure the College records are forwarded as a matter of priority and within statutory timescales.

## Dealing with allegations against staff

All College staff should take care not to place themselves in a vulnerable position with a student. It is always advisable for interviews or work with individual students or parents to be conducted in view of other adults. In addition, staff should understand that, under the Sexual Offences Act 2003, it is an offence for a person over the age of 18 to have a sexual relationship with a person under the age of 18, where that person is in a position of trust, even if the relationship is consensual. This means that sexual activity between a member of College staff and a student under 18 may be a criminal offence, even if that student is over the age of consent.

If an allegation is made, or information is received about a member of staff which suggests that a person may be unsuitable to work with students, the member of staff receiving the allegation or information, will immediately inform the Principal. This information will be recorded. The Local Authority Designated Officer (LADO) will be contacted and relevant guidance followed. If the allegation made to a member of staff concerns the Principal, the person receiving the allegation will immediately inform the Chair of Trustees who will consult with the LADO, without notifying the Principal first.

The College will follow the Surrey procedures for managing allegations against staff. Under no circumstances will we send a student home, pending such an investigation, unless this advice is given exceptionally, as a result of a consultation with the LADO.

Suspension of the member of staff, excluding the Principal, against whom an allegation has been made, needs careful consideration, and the Principal will seek the advice of the LADO and Personnel in making this decision. In the event of an allegation against the Principal, the decision to suspend will be made by the Chair of Trustees.

## **Whistleblowing**

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

All staff should be aware of their duty to raise concerns, where they exist, about the management of child protection, which may include the attitude or actions of colleagues, poor or unsafe practice and potential failures in the College's safeguarding arrangements. If it becomes necessary to consult outside the College, they should speak, in the first instance, to the LADO in accordance with the Whistleblowing Policy.

Whistleblowing regarding the Principal should be made to the Chair of the Board of Trustees whose contact details are available to staff.

## **Prevention/Protection**

We recognise that the College plays a significant part in the prevention of harm to our students by providing students with good lines of communication with trusted adults, supportive friends and an ethos of protection.

The College will:

- establish and maintain an ethos where students feel safe and secure, are encouraged to talk and are always listened to
- include regular consultation with students e.g. through questionnaires, participation in Shaping Futures tutorial activities, etc.
- ensure that all students know there is and can access an adult in the College whom they can approach if they are worried or in difficulty
- include safeguarding across the curriculum including, where appropriate, opportunities which equip students with the skills they need to stay safe from harm and to know to whom they should turn for help
- ensure all staff are aware of College guidance for their use of mobile technology and have discussed safeguarding issues around the use of mobile technologies and their associated risks

## Child Protection and Safeguarding Issues and Categories

### Looked After Children

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

The College ensures that staff have the necessary skills and understanding to keep looked after children safe. Appropriate staff have information about a student's looked after legal status and care arrangements, including the level of authority delegated to the carer by the authority looking after the student and contact arrangements with birth parents or those with parental responsibility.

The Designated Teacher will act as the key contact for a Looked After Child or a previously Looked After Child during their time at College. The Designated Teacher will meet on a termly basis with the student, their social worker and carers to update a Personal Education Plan.

### What is child abuse?

The following definitions are taken from *Working Together to Safeguard Children* HM Government (2018). In addition to these definitions, it should be understood that students can also be abused by being sexually exploited, through honour based violence, forced marriage or female genital mutilation. To support the local context, all staff have access to the [Surrey Safeguarding Children Partnership Levels of Need Threshold Document](#).

### What is abuse and neglect?

Abuse and neglect are forms of maltreatment of a student. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting, by those known to them or, more rarely, by a stranger. They may be abused by an adult or adults, or another child or children.

### Physical abuse

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

### Emotional abuse

Emotional abuse is defined as the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development.

It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children.

These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another.

It may involve serious bullying (including cyber bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of students. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur in isolation.

### **Sexual abuse**

This involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening.

The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including online).

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

### **Neglect**

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

Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to:

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

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

### **Indicators of abuse**

#### **Neglect**

The nature of neglect:

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

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

Neglect can include parents or carers failing to:

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

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

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

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

### **Indicators of neglect**

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

It is important to recognise that indicators alone cannot confirm whether a student is being abused. Each student should be seen in the context of their family and wider community and a proper assessment carried out by appropriate persons. What is important to keep in mind is that if you feel unsure or concerned, do something about it. Don't keep it to yourself.

#### Physical indicators of neglect

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

#### Behavioural indicators of neglect

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

## **Emotional abuse**

The nature of emotional abuse:

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

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

## **Indicators of emotional abuse**

### Developmental issues

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

### Behaviour

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

### Social issues

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

### Emotional responses

- Extreme fear of new situations
- Inappropriate emotional responses to painful situations (“I deserve this”)
- Fear of parents being contacted
- Self-disgust
- Low self-esteem
- Unusually fearful with adults
- Lack of concentration, restlessness, aimlessness
- Extremes of passivity or aggression

### Physical abuse

The nature of physical abuse:

Most children collect cuts and bruises quite routinely as part of the rough and tumble of daily life. Clearly, it is not necessary to be concerned about most of these minor injuries. But accidental injuries normally occur on the *bony prominences* – e.g. knees, shins.

Injuries on the *soft* areas of the body are more likely to be inflicted intentionally and should therefore make us more alert to other concerning factors that may be present.

A body map can assist in the clear recording and reporting of physical abuse. The body map should only be used to record observed injuries and no student should be asked to remove clothing by a member of staff of the College.

### Indicators of physical abuse / factors that should increase concern

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

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

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

You should be concerned if a student:

- is reluctant to have parents/carers contacted
- runs away or shows fear of going home
- is aggressive towards themselves or others
- flinches when approached or touched
- is reluctant to undress to change clothing for sport
- wears long sleeves during hot weather
- is unnaturally compliant in the presence of parents/carers
- has a fear of medical help or attention
- admits to a punishment that appears excessive.

## **Sexual Abuse**

The nature of sexual abuse:

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

Sexual exploitation is seen as a separate category of sexual abuse. The [SSCP professional guidance](#) provides College staff with information regarding indicators of CSE.

Characteristics of child sexual abuse:

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

## **Indicators of sexual abuse**

Physical observations:

- damage to genitalia, anus or mouth
- sexually transmitted diseases
- unexpected pregnancy
- soreness in genital area, anus or mouth and other medical problems such as chronic itching
- unexplained recurrent urinary tract infections and discharges or abdominal pain

Behavioural observations:

- sexually inappropriate behaviour
- hinting at sexual activity
- inexplicable decline in education progress
- depression or other sudden apparent changes in personality such as becoming insecure
- lack of concentration, restlessness, aimlessness
- socially isolated or withdrawn
- overly-compliant behaviour
- acting out, aggressive behaviour
- poor trust or fear concerning significant adults
- regressive behaviour,
- onset of wetting, by day or night; nightmares
- arriving early at College, leaving late, running away from home
- suicide attempts, self-mutilation,
- eating disorders or sudden loss of appetite or compulsive eating
- Become worried about clothing being removed
- trying to be 'ultra-good' or perfect; overreacting to criticism.

## **Radicalisation and Extremism**

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

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

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

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

The College seeks to protect students against the messages of all violent extremism including, but not restricted to, those linked to Islamist ideology, or to Far Right / Neo Nazi / White Supremacist ideology, Irish Nationalist and Loyalist paramilitary groups, and extremist Animal Rights movements. Designated Safeguarding Lead (DSL) will assess the level of risk within the College and put actions in place to reduce that risk. Risk assessment may include, [due diligence checks for external speakers and private hire of facilities](#), anti-bullying policy etc.

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

When any member of staff has concerns that a student may be at risk of radicalisation or involvement in terrorism, they should speak with the DSL in the first instance. The DSL should then follow the safeguarding procedures and refer cases by e-mail to [preventreferrals@surrey.pnn.police.uk](mailto:preventreferrals@surrey.pnn.police.uk) following the [Prevent referral process](#) and use the Prevent referral form. If the matter is urgent then Police must be contacted by dialling 999. In cases where further advice from the Police is sought dial 101 or 01483 632982 and ask to speak to the Prevent Supervisor for Surrey.

### **Indicators of vulnerability to radicalisation**

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

Extremism is defined by the Crown Prosecution Service as:

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

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

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

Indicators of vulnerability include:

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

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

More critical risk factors could include:

- being in contact with extremist recruiters
- accessing violent extremist websites, especially those with a social networking element
- possessing or accessing violent extremist literature
- using extremist narratives and a global ideology to explain personal disadvantage
- justifying the use of violence to solve societal issues
- joining or seeking to join extremist organisations
- significant changes to appearance and / or behaviour
- experiencing a high level of social isolation resulting in issues of identity crisis and / or personal crisis.

## **Domestic Abuse**

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

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

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

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

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

Child sexual exploitation is a form of child sexual abuse.

It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator.

The victim may have been sexually exploited even if the sexual activity appears consensual.

Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology. All staff are aware of the link between online safety and vulnerability to CSE.

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

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

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

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

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

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

### **Child Criminal Exploitation & Gangs**

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

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

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

Criminal exploitation of students is a typical feature of county lines criminal activity. Key identifying features of involvement in county lines are when students are missing, when the victim may have been trafficked for transporting drugs, a referral to the National Referral Mechanism should be considered with Social Care and Police colleagues.

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

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

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

### **Youth produced sexual imagery (sexting)**

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

Youth produced sexual imagery refers to both images and videos where a person under the age of 18:

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

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

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

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

The member of staff should confiscate the device involved and set it to flight mode or, if this is not possible, turn it off. Staff must not view, copy or print the youth produced sexual imagery.

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

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

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

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

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

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

During the decision-making, the DSL will consider if:

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

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

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

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

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

The duty applies to all persons in College who are employed or engaged to carry out 'teaching work' in the College, whether or not they have qualified teacher status.

The duty applies to the individual who becomes aware of the case to make a report. It should not be transferred to the Designated Safeguarding Lead, however the DSL should be informed.

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

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

Concerns about FGM outside of the mandatory reporting duty should be reported using the College's child protection procedures. Staff should be particularly alert to suspicions or concerns expressed by female students about going on a long holiday during the summer holiday.

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

There are no circumstances in which a teacher or other member of staff should examine a girl.

### **Forced Marriage**

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

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

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

College staff should never attempt to intervene directly as a college or through a third party. Contact should be made with the C-SPA and/or the Forced Marriage Unit 200 7008 0151.

## **Honour-based Violence**

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

Honour based 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
- become involved with a boyfriend or girlfriend from a different culture or religion
- want to get out of an arranged marriage
- want to get out of a forced marriage
- wear clothes or take part in activities that might not be considered traditional within a particular culture

It is considered a violation of human rights and may be a form of domestic and/or sexual abuse.

## **One Chance Rule**

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

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

## **Anti-Bullying/Cyberbullying**

Our College policy on anti-bullying is set out in a separate document and acknowledges that to allow or condone bullying may lead to consideration under child protection procedures.

We keep a record of known bullying incidents. All staff are aware that students with SEND and/or differences/perceived differences are more susceptible to being bullied/victims of child abuse.

When there is 'reasonable cause to suspect that a student is suffering, or is likely to suffer, significant harm' a bullying incident should be addressed as a child protection concern. If the anti-bullying procedures are seen to be ineffective, the DSL or Principal will also consider child protection procedures.

## **Online Safety**

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

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

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

The College seeks to build upon the PHSE work done in schools to provide information and promote awareness to both students and parents.

**Further advice on safeguarding and child protection is available from:**

[Surrey County Council Education Safeguarding Team](#)

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

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

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

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

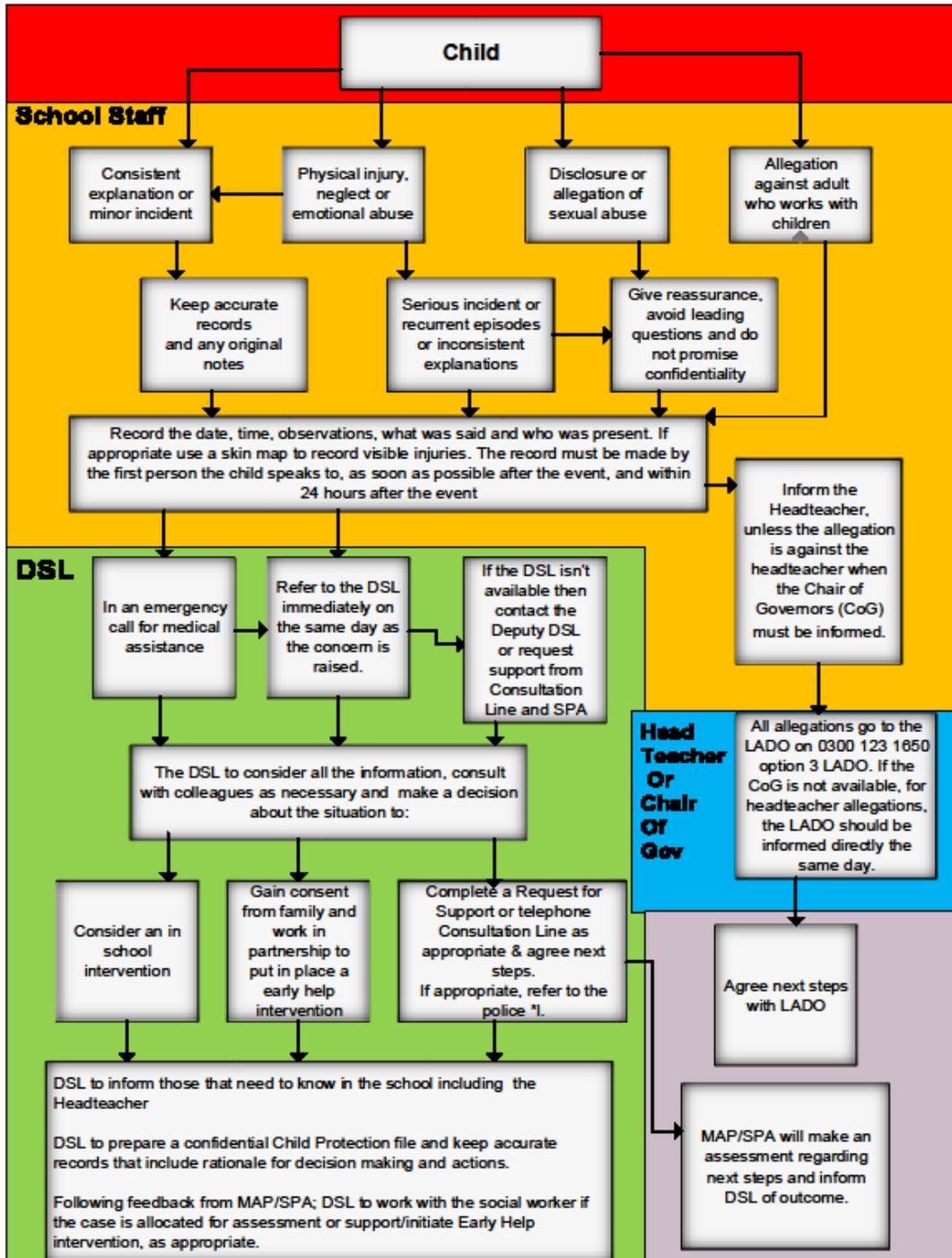
Childnet International –making the internet a great and safe place for children. Includes resources for professionals and parents <http://www.childnet.com/>

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

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

- [Surrey Safeguarding Children Partnership protocols, guidance and procedures](#)
- [Working Together to Safeguard Children 2018](#)
- [Keeping Children Safe in Education 2019 \(KCSIE\)](#)
- [Disqualification under the Childcare Act 2006 \(updated 2019\)](#)
- [FGM Act 2003 Mandatory Reporting Guidance 2016](#)
- ['What to do if you are worried a child is being abused' 2015](#)
- [Information Sharing Advice for Practitioners' guidance 2018](#)
- [SCC Touch and the use of physical intervention when working with children and young people](#)
- [The Equality Act 2010](#)

## Child Protection Procedures Flowchart



*\* In the cases of known FGM, the teacher who was made aware will also make contact with the police*