

Policy Name	Child Protection & Safeguarding Policy and Procedures
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E & D Disclaimer	This policy has been reviewed in line with the Equality Act 2010 which recognises the following categories as Protected Characteristics: Age, Disability, Gender Reassignment, Marriage and Civil Partnership, Pregnancy and Maternity, Race, Religion and Belief, Sex (gender) and Sexual orientation. We will continue to monitor this policy to ensure that it provides equal access and does not discriminate against anyone, especially any person/s listed under any protected characteristic.

Child Protection and Safeguarding Policy and Procedures



Contents

Child Protection & Safeguarding Policy	3
1. Purpose	3
2. Scope	3
3. Policy Statement.....	3
4. Legal Framework.....	4
5. Local and National Safeguarding Priorities.....	5
6. Equality and Diversity Statement.....	6
7. Monitoring and Review	6
8. Supporting Documentation	6
Child Protection & Safeguarding Procedures	8
9. Definitions.....	8
10. Specific Safeguarding Issues	10
11. Designated Staff.....	10
12. Safeguarding Information for Students.....	11
13. Responding to a Disclosure or Suspicion of Abuse.....	11
14. Safeguarding Students Aged 16 and 17.....	12
15. Safeguarding Students with Special Educational Needs & Disabilities	13
16. Safeguarding Residential Students	13
17. Safeguarding Students Working Online / Blended Learning.....	14
18. Work Placements	14
19. Working with Employers (Apprenticeship Provision)	15
20. Partnerships with Others	15
21. Supporting the Student and Partnership with Parents & Carers.....	15
22. Information Sharing	16
23. Confidentiality	16
24. Record Keeping.....	17
25. Safer Recruitment of Staff	17
26. Training of Staff	17
27. Safe Practice	18
28. Allegations of Abuse against Staff.....	18
29. Support for the Safeguarding Team	19

30.	Support for Staff	19
31.	Safeguarding Groups	20
32.	Preventing Violent Extremism – The ‘Prevent’ Agenda	20
33.	Early Help.....	21
34.	Students with Social Worker Involvement	21
35.	Students Requiring Mental Health Support	21
36.	Looked After Children / Children in Care / Previously Looked After / Leaving Care	21
	Annex A – Specific Safeguarding Issues.....	23
	Child Abduction and Community Safety Incidents	23
	Children and the Court System.....	23
	Children Missing from Education	23
	Children with Family Members in Prison.....	23
	Child Criminal Exploitation (CCE).....	24
	Child Sexual Exploitation (CSE)	24
	County Lines.....	24
	Domestic Abuse.....	25
	Homelessness	25
	So-Called ‘Honour-Based’ Abuse (including Female Genital Mutilation and Forced Marriage)	26
	Female Genital Mutilation (FGM).....	26
	Forced Marriage	27
	Preventing Radicalisation	27
	The Prevent Duty (<i>Currently in Consultation so may change</i>).....	28
	Channel	28
	Peer on Peer / Child on Child Abuse	29
	Sexual violence and sexual harassment between children in schools and colleges	29
	Annex B - Safer Recruitment Guidance	31
	Annex C – Safeguarding Children and Vulnerable Adults – Summary for Staff	33
	Annex D - Safeguarding at Trinity Arts and Leisure - Guidance for Staff	37

Child Protection & Safeguarding Policy

1. Purpose

- 1.1. This policy states the responsibilities of the college in relation to safeguarding children and vulnerable adults, in line with current legislation and guidance.

2. Scope

- 2.1 Throughout the policy and supporting documentation, reference is made to 'children'. This term is used to mean those under the age of 18. The College recognises that some adults are also vulnerable to abuse therefore the procedures may be applied (with appropriate adaptations) to allegations of abuse and the protection of adults at risk.

3. Policy Statement

- 3.1. The Bedford College Group aims to maintain a safe and welcoming environment on all its sites for staff, students (including residential students) and visitors. It is committed to meeting its duty to safeguard and promote the welfare of children and vulnerable adults, and recognises its role in identifying cases of suspected abuse and making referrals to the appropriate investigating agency.
- 3.2. It takes its obligation seriously to deliver the outcomes specified in the Ofsted Education and Skills Inspection Framework. In the context of this policy, inspectors will make a judgement on the effectiveness of leadership and management by evaluating the extent to which leaders, managers and governors help and protect all learners and keep them safe.
- 3.3. The college recognises the need to work with other agencies in performing its duties under the Education Act 2011 and Children Act 2004. These are, in summary:
 - to have in place and follow procedures in keeping with local inter-agency (Local Safeguarding Children's Board) guidelines
 - to operate safer recruitment procedures
 - to have in place procedures to deal with allegations against staff
 - to designate a senior member of staff as having lead responsibility for safeguarding children, and ensure that they receive appropriate training
 - to liaise with schools regarding pre-16 students
 - to ensure all staff working with young people, under 18, receive appropriate safeguarding children training and are aware of their responsibilities
 - to review policies and procedures annually
 - to represent the college on the Local Safeguarding Children Board.
- 3.4. The safety and well-being of children are paramount and all concerns of abuse are taken seriously.

- 3.5. The college is committed to applying these principles in respect of those felt to be 'vulnerable'.
- 3.6. The Director of Student Services and the Director of HR are nominated to co-ordinate and manage procedures relating to the protection and safeguarding of children and vulnerable adults including safer recruitment and staff training.
- 3.7. The college reserves the right to refuse admission to any student who may pose a risk to children or vulnerable adults, and has appropriate student admissions procedures in place.

4. Legal Framework

- 4.1. DfES circular 10/95 set out the role of FE colleges in helping to protect children from abuse, under the terms of the Children Act 1989.
- 4.2. The Children Act 1989 placed a duty on Local Authorities to investigate situations where a child is at risk of significant harm. Schools and Colleges had a legal obligation to work with investigating agencies acting on behalf of children in need.
- 4.3. Section 175 of the Education Act 2002, which came into force in June 2004, a duty on local authorities, the governing bodies of maintained schools the governing bodies of Further Education institutions to have arrangements in place to ensure that they safeguard and promote the welfare of children. This duty is very general but acquires substance in guidance issued periodically by the Department for Education. S175 imposes a statutory duty to have regard to the guidance issued by the Secretary of State.
- 4.4. Responsibility for making sure appropriate arrangements are in place lies with the Governing Body. Staff members are responsible for carrying out their duties in compliance with the arrangements set out by the Governing Body.
- 4.5. The Children Act 2004 resulted from Lord Laming's report into the death of Victoria Climbié. Section 11 of the Act, which came into force in October 2005, brought other key agencies into line with the duties already placed on schools and colleges by s175 of the Education Act 2002. Section 13 (as amended) specifies membership of local safeguarding boards, including Further Education Colleges.
- 4.6. Guidance was published in 'Safeguarding Children in Education' (2004), in 2007 to 'Safeguarding Children and Safer Recruitment in Education'. It set out the requirements to provide a safe learning environment, identify young people suffering, or likely to suffer, significant harm and take appropriate action in full partnership with other local agencies. It encompassed wider issues such as health, safety, drug/substance abuse and bullying, and included specific guidance relating to the recruitment and vetting of staff, in the light of the Bichard enquiry into the Soham murders.
- 4.7. In April 2014, the Department for Education replaced this with new statutory guidance 'Keeping Children Safe in Education'. The guidance was revised several times with the latest version being updated in September 2021 and reflects changes to the vetting of staff, including

the introduction of the Disclosure and Barring Service (DBS) to replace CRB, and the notion of 'regulated activity' which prescribes which staff may and may not be subject to pre-appointment checks. The document sets out what schools and colleges should do to safeguard and promote the welfare of children, as well as the legal duties with which they must comply. Additional changes have included additional guidance and information on specific safeguarding issues, for example, Sexual Violence. Although it is designed to be read in conjunction with 'Working Together to Safeguard Children', the intention of the guidance was to scale back to a minimal set of requirements which make clear where individuals should use their own professional judgement.

- 4.8. The Protection of Freedoms Act 2012 changed the definitions of regulated activity and amended the provisions of the Safeguarding Vulnerable Groups Act 2006, which altered the definition of a vulnerable adult.
- 4.9. The Bedford College Group is not an investigating agency. This function is carried out by local authority Children's Services, or other agencies with statutory powers (MASH etc).
- 4.10. There is a mandatory duty to report known cases of Female Genital Mutilation to the Police.
- 4.11. The Children Act 1989, and subsequent legislation and guidance, are concerned with the emotional, physical or sexual abuse or neglect of children, defined as under the age of 18. However, it is recognised that children acquire degrees of legal capacity (for example, the ability to give informed consent) and maturity prior to their 18th birthday, and also that there are adults over 18 who continue to be vulnerable due to a learning difficulty and/or disability. It is also acknowledged that additional barriers may exist when recognising the signs of abuse and neglect in children who have special educational needs and/or disabilities.
- 4.12. In February 2015 the Counter-Terrorism and Security Act placed on colleges identifies the duty to have due regard to the need to prevent people from being drawn into terrorist activity.
- 4.13. In September 2021, new guidance was released for Sexual Violence and Sexual Harassment Between Children in Schools & Colleges.

5. Local and National Safeguarding Priorities

- 5.1. Through its participation on the Local Safeguarding Children Board's and liaison with The Safeguarding Children Partnerships, the College is mindful of the current local and national agenda, including drug and alcohol misuse, missing education, sharing self-generated indecent images, Child Sexual Exploitation (CSE), Child Criminal Exploitation (CCE), Female Genital Mutilation (FGM), Mental Health, Peer on Peer Abuse and Sexual Violence. The College also recognises its role in promoting the wellbeing of its students, and, through its tutorial framework, cross-college events and national campaigns, seeks to

raise student awareness of safeguarding issues and develop resilience and protective behaviours.

6. Equality and Diversity Statement

- 6.1. The Bedford College Group is committed to the promotion and development of equality and diversity. We aim to provide a working and learning environment which values individuals equally and does not discriminate on any grounds including age, disability, race, sex (gender), sexual orientation, gender reassignment, religion or belief, marriage or civil partnership and pregnancy and maternity.
- 6.2. This policy and procedure will be implemented in accordance with our policy on equality and diversity, and decisions/actions taken in relation to a potential safeguarding or child protection incident will not be influenced by the background or situation of any persons involved. Each case will be dealt with on its own merits.
- 6.3. This policy is subject to equality impact analysis.

7. Monitoring and Review

- 7.1. Implementation of this policy will be monitored through termly committee meetings and an annual report to the Board of Governors.
- 7.2. The policy will be reviewed at least annually by The Bedford College Group Safeguarding Committee and agreed by the College Executive and Board of Governors.

8. Supporting Documentation

- 8.1. The following College documents give further guidance on the application of this policy and matters relating to the wider child protection and agenda:
 - Admissions Policy
 - Anti-Bullying and Harassment Policy
 - Bedford Borough Safeguarding Children Board Procedures
 - Child Protection Procedures Manual – Local Safeguarding Children’s Board Northamptonshire
 - Children Act 1989 and 2004
 - Confidentiality Procedure
 - Dealing with Criminal Convictions Policy
 - Disclosure or Display of Potentially Harmful Behaviours Procedure for Applicants
 - Domestic abuse: how to get help
 - Education Act 2002 (s175)
 - Fitness to Study Procedure
 - Further Education Residential Accommodation: National Minimum Standards (2018)
 - Guidance for Safer Working Practice for Adults who Work with Children and Young People in Education Settings (2019)

- ICT Acceptable Use Policy
- Keeping Children Safe in Education (2021)
- Looked After Children Policy
- Mental Health and Behaviour in Schools Guidance
- Missing Student Procedure
- Netiquette Guidelines for Staff
- Netiquette Guidelines for Students
- Northamptonshire Thresholds Guidance (2018)
- Prevent Duty Guidance for Further Education (2019)
- Procedure for Visiting Speakers and Events
- Professional Boundaries
- Protection of Freedoms Act 2012
- Safeguarding Vulnerable Groups Act 2006
- Sexual Violence and Sexual Harassment Between Children in Schools and Colleges (2021)
- Sexual Violence and Sexual Harassment Policy & Procedures
- Sharing Nudes and Semi-Nudes (2020)
- Social Media Policy
- Staff Code of Conduct
- Staff and Student Disciplinary Procedures
- What to do if you are worried a child is being abused (2015)
- When to Call the Police
- Working Together to Safeguard Children (2015)

Child Protection & Safeguarding Procedures

These guidelines apply to all adults, including volunteers, working in or on behalf of the College.

“Schools and 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.

*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.*

*No single practitioner can have a full picture of a child’s needs and circumstances. If children and families are to receive the right help at the right time, **everyone** who comes into contact with them has a role to play in identifying concerns, sharing information and taking prompt action.”*

Keeping Children Safe in Education DfE September 2021

It is commonly accepted that College staff spend so much time in contact with children that they are in a good position to discern whether they may be a victim of abuse or not. However, it is important to know what this abuse is and how it can be picked up on.

The four principal categories of harm suffered by children are set out in national guidance. These are used to assist those responsible for the welfare and protection of children to understand and recognise the symptoms of abuse.

The diagnosis of abuse is difficult, even for experts. **It is NOT the role of College staff to define or attempt to diagnose whether a child or vulnerable adult has suffered abuse within certain categories.** An understanding of the categories is, however, important to enable staff to recognise symptoms of abuse.

The following procedures relate to child protection incidents. Guidance for staff at Trinity Arts and Leisure is included at [Annex D](#).

9. Definitions

- 9.1. Throughout this document the following definitions apply:
- Child:** a young person under the age of 18
 - Safeguarding:** includes promotion of health and well-being as well as protection of specific individuals
 - Designated Safeguarding Lead (DSL):** the staff member(s) designated by the Principal as having responsibility for liaising with the investigating agency
 - 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.

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

Emotional abuse: the persistent emotional maltreatment of a child such as to cause severe and 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 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.

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 is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse by other children is a specific safeguarding issue in education.

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 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.

10. Specific Safeguarding Issues

- 10.1. 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.
- 10.2. All staff should be aware that safeguarding issues can manifest themselves via peer on peer abuse. This is most likely to include, but may not be limited to:
 - abuse in intimate personal relationships between peers
 - bullying (including cyberbullying, prejudice-based and discriminatory bullying)
 - causing someone to engage in sexual activity without consent
 - consensual and non-consensual sharing nudes and semi-nude images and or videos
 - physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm
 - sexual violence and sexual harassment
 - initiation/hazing type violence and rituals
 - upskirting.
- 10.3. All staff should be clear as to the college's policy and procedures with regards to Peer on Peer / Child on Child Abuse, Sexual Violence and Harassment and Disclosure or Display of Potentially Harmful Behaviours.
- 10.4. The College has a zero-tolerance policy for Peer on Peer / Child on Child Abuse and this will be dealt with via the Student Disciplinary Policy unless of a sexual nature and then it will be dealt with initially via the Sexual Violence and Sexual Harassment Policy & Procedures.
- 10.5. Expert and professional organisations are best placed to provide up-to-date guidance and practical support on specific safeguarding issues.
- 10.6. Specific forms of abuse and safeguarding issues can include:
 - Child criminal exploitation (CCE) and Child sexual exploitation (CSE)
 - Mental health
 - Peer on peer / child on child abuse
 - Serious violence
- 10.7. For more specific detail regarding the above categories and others, please see [Annex A](#).

11. Designated Staff

- 11.1. A list of designated persons with responsibility for safeguarding and child protection is given at [Annex C](#).
- 11.2. There is a designated governor with specific responsibilities for safeguarding. The designated governor is a member of The Bedford College Group Safeguarding Committee and is responsible for ensuring the college has policies and procedures in place which are considered annually by the Board of Governors.

12. Safeguarding Information for Students

- 12.1. The College is committed to ensuring that students are aware of behaviour towards them that is not acceptable and how they can keep themselves safe. All students know that there is a Safeguarding Team and how to make contact with them. The College will inform students of whom they might talk to, both in and out of college, their right to be listened to and heard and what steps can be taken to protect them from harm. This information is delivered to students at the start of their course and reinforced throughout their programme of study. It is also available on the Moodle pages and the College websites. College documentation also highlights who to speak to.
- 12.2. There is an anonymous reporting system for students to refer concerns, should they not wish to be identified.
- 12.3. College's arrangements for consulting with and listening to students are through the Students' Union and Student Forums.
- 12.4. Students are made aware of these arrangements by presentations, the Tutorial Programme and poster campaigns, the induction programme and College documents including Handbooks.

13. Responding to a Disclosure or Suspicion of Abuse

- 13.1. It is not the responsibility of the College's staff to investigate welfare concerns or determine the truth of any disclosure or allegation. All staff, however, have a duty to recognise concerns and maintain an open mind. Accordingly all concerns regarding the welfare of students will be recorded and discussed with a member of the Safeguarding Team prior to any discussion with parents.
- 13.2. If, at any point, there is a risk of immediate serious harm to a child a referral should be made to children's social care immediately. Anybody can make a referral however, this should be completed with guidance from a member of the Safeguarding Team. If the child's situation does not appear to be improving the staff member with concerns should press for re-consideration. Concerns should always lead to help for the child at some point.
- 13.3. Any member of staff who has knowledge of, or a suspicion that, a child / vulnerable adult is or has been suffering significant harm must refer their concern to a member of the Safeguarding Team immediately. In exceptional circumstances such as out of hours, if no designated staff member is available, this should be referred to the Duty Manager.
- 13.4. In exceptional circumstances where there is no member of the Safeguarding Team available, staff must ensure that the process for referring a student to external agencies is not delayed.
- 13.5. All allegations or suspicions must be taken seriously. The student must be advised that this information cannot be kept confidential and will be passed on to the Safeguarding Team in the first instance.
- 13.6. Staff training recognises the many possible perpetrators of abuse, including adults inside or outside College, peer on peer abuse and online.

- 13.7. Staff who receive an allegation or disclosure of abuse should make an immediate written record of the conversation via the Confidential Comment section on ProMonitor as either a wellbeing concern or Safeguarding referral, including the following information:
- date and time of report
 - date, time and place of alleged abuse
 - your name and name of complainant
 - name of child alleged to have been abused, if different from above
 - nature of alleged abuse including perpetrator, if known
 - description of any injuries observed, if any
 - any other information given, including siblings, if relevant
 - distinguish between observation, fact and opinion
 - confirmation that the student has been advised of the next steps
- 13.8. Questions should be kept to the minimum required for clarity, and leading questions must be avoided.
- 13.9. It may also be appropriate to remind the student about the availability of the college Counselling Service or external helplines.
- 13.10. Staff should be aware that when making a safeguarding referral, they may be asked to contribute towards assessments by external agencies. This may include the [Early Help](#) process.

14. Safeguarding Students Aged 16 and 17

- 14.1. These students are covered in law by the Children Act. This means that allegations or suspicions of abuse must be taken seriously by the college and acted upon according to the procedure.
- 14.2. Concerns or suspicions must be referred to the Safeguarding Team even if the student's stated wishes are to the contrary. They will seek advice from the appropriate investigating agency and agree any further action which may be necessary. This may include a formal referral using the agency's proforma.
- 14.3. Students aged 16 and 17 are encouraged to report the abuse, or give consent for a report to be made, to an investigating agency. This will usually be the Children's Services department in the area where the student lives, via the relevant Multi-Agency Support Hub (MASH). The student should be made aware that it may be necessary to report the abuse even without their consent.
- 14.4. The following issues are relevant:
- what are the wishes of the student?
 - are younger siblings involved?
 - is a criminal act being committed?
 - is there immediate risk of significant harm?

15. Safeguarding Students with Special Educational Needs & Disabilities

- 15.1. Children with special educational needs (SEN) and disabilities can face additional safeguarding challenges and these children can have additional barriers when staff are recognising abuse and neglect.
- 15.2. These can include:
 - assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration
 - being more prone to peer group isolation than other children
 - the potential for children with SEN and disabilities being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs
 - communication barriers and difficulties in overcoming these barriers.
- 15.3. To address these additional challenges, The Bedford College Group ensures that these departments have a dedicated Personal Achievement Tutor.
- 15.4. The Safeguarding Team will liaise with the Additional Learning Support Team where appropriate.

16. Safeguarding Residential Students

- 16.1. Provision for residential students based at our Shuttleworth College complies with the guidelines outlined in the Further Education Residential Accommodation National Minimum Standards – September 2018.
- 16.2. The National Minimum Standards are applicable to Further Education Colleges accommodating students under 18 and are intended to safeguard and promote the welfare of young people under the age of 18 for whom accommodation is provided.
- 16.3. The National Minimum Standards are not applicable to those students 18 or over, although the policies and procedures in place, including the provision of a team of trained wardens, are relevant to all residential students regardless of age.
- 16.4. Compliance with the National Minimum Standards is monitored through external inspection by Ofsted.
- 16.5. Safeguarding measures are put in place under each of the standards, which are separated into the following categories:
 - Welfare Policies and Procedures
 - Organisation and Management
 - Welfare Support
 - Staffing
 - Premises

17. Safeguarding Students Working Online / Blended Learning

- 17.1 It is important that all staff who interact with our students, including online, continue to look out for signs a young person may be at risk. Any such concerns should be dealt with as per the Child Protection and Safeguarding Policy and where appropriate, referrals should still be made to children's social care and as required, the Police. Referrals made directly to children's social care and/or the Police should still be referred to the College's safeguarding team to ensure that a central record is always in place.
- 17.2 The Bedford College Group will ensure any use of online learning tools and systems is in line with privacy and data protection/GDPR requirements.
- 17.3 The Bedford College Group has written Netiquette Guidelines for Students and these should be shared during induction. These should also be reinforced throughout the year.
- 17.4 The Bedford College Group has ICT Acceptable Use Guidelines which should be read in conjunction with this section. These are shared with students at Induction and reinforced throughout the year.

18. Work Placements

- 18.1. Staff responsible for co-ordinating work placements/work experience must have received the relevant training. They must take the safeguarding of students, whether children or vulnerable adults, into account at the planning stage when assessing the suitability of the placement and as part of the college's health and safety procedures. Although students may be deemed more vulnerable to harm or abuse when in long-term placement in the workplace, all placements must be assessed for safeguarding risks.
- 18.2. It is however recognised that in these circumstances the employer has primary responsibility for the health and safety of the student, and the college should therefore be satisfied that the employer understands and is managing the risks, including safeguarding, associated with young people in the workplace.
- 18.3. The statutory guidance specifies that colleges may not request enhanced DBS checks for staff supervising children aged 16 or 17 on work experience. However, if the person working with the student in the workplace is unsupervised and in frequent contact with them, the employer may be asked to ensure that that person is not on the barred list.
- 18.4. All students on work placement should have a regular point of contact within college, and be made aware that they can discuss with that person or with a Work Placement Coordinator should they have any concerns about their placement. Any concerns raised about their work placement or any suspicions of abuse must be reported to the Safeguarding Team immediately and procedures followed as outlined in section 13.

- 18.5. Students should be appropriately prepared for their work placement to ensure they understand how to keep themselves safe (protective behaviours) as well as their own responsibilities to others in the work place.
- 18.6. Where a student's placement is classed as 'regulated activity', the student will normally be required to have an enhanced DBS check.

19. Working with Employers (Apprenticeship Provision)

- 19.1. Employers have a responsibility to safeguard their students and the procedure they should follow if they have concerns for a student can be found on the College's website. Employers will be provided with the web link to the Child Protection & Safeguarding policy within their Apprenticeship Training Agreement
- 19.2. A number of safeguards will be in place to support the apprenticeship provision including:
 - Risk Assessment process of employers linked to Health and Safety and Equality and Diversity
 - Sharing the College's safeguarding procedures and guidelines with employers and ensuring they have read it
 - Risk assessing ex-offenders process.

20. Partnerships with Others

- 20.1. The College recognises that it is essential to establish positive and effective working relationships with other agencies e.g. Local Authority, Multi-Agency Safeguarding Hub (MASH), Police, Health, National Youth Advocacy Service, Youth Agencies, Local counselling agencies, CAMHS, Local Safeguarding Boards, The Safeguarding Children Partnerships, GFE Safeguarding Network and the Prevent Teams.

21. Supporting the Student and Partnership with Parents & Carers

- 21.1. The College recognises that the child's/young person's welfare is paramount, however good child protection practice and outcomes rely on a positive, open and honest working partnership with parents/carers.
- 21.2. Whilst we may, on occasion, need to make referrals without consultation with parents/guardians, we will make every effort to maintain a positive working relationship with them whilst fulfilling our duties to protect any student.
- 21.3. We will provide a secure, caring, supportive and protective relationship for the student.
- 21.4. Students will be given a proper explanation (appropriate to age and understanding) of what action is being taken on their behalf and why.
- 21.5. We will endeavour always to preserve the privacy, dignity and right to confidentiality of the student and parents/carers. The Designated

Safeguarding Lead or Deputy Designated Safeguarding Lead will determine which members of staff “need to know” personal information and what they “need to know” for the purpose of supporting and protecting the child/young person.

22. Information Sharing

- 22.1. Information sharing is vital in identifying and tackling all forms of abuse.
- 22.2. Whilst the Data Protection Act 2018 places duties on organisations to process personal information fairly and lawfully and to keep the information they hold safe and secure, this is not a barrier to sharing information where the failure to do so would result in a child being placed at risk of harm. Fears about sharing information cannot be allowed to stand in the way of the need to promote the welfare and protect the safety of children.
- 22.3. 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, ensuring secure transit, and confirmation of receipt should be obtained.
- 22.4. 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.

23. Confidentiality

- 23.1. A good working relationship between staff and students depends, to a large extent, on the establishment of trust. This may be described as a ‘confidential relationship’. However, guarantees of absolute confidentiality should not be given as it may prove necessary to make a referral to an appropriate agency.
- 23.2. If a student discloses abuse to a member of staff, it is important that the boundaries of confidentiality and the need to pass on that information are explained to the student. It is often easier to explain to the student that you have a responsibility to pass on information on certain matters than to get into a situation where you break confidence.
- 23.3. The college counsellors work to the British Association for Counselling and Psychotherapy ethical framework. This allows the counsellor to break confidentiality in exceptional circumstances, with or without the student’s consent if necessary where, in her/his professional judgement:
 - there is a serious risk of the student harming themselves or being harmed
 - there is a serious risk of another person being harmed
 - there is a risk of a serious crime being committed.

24. Record Keeping

- 24.1. All wellbeing concerns and safeguarding referrals will be confidentially recorded on ProMonitor. These will be detailed, accurate and include a full audit trail.
- 24.2. All written records must be passed to the Safeguarding Team.
- 24.3. Records will include discussions held and decisions made, as well as reasons for closure of record.
- 24.4. Records will be kept securely, and held until the student's 25th birthday (or, for vulnerable adults, for 2 years after the end of the academic year in which the referral was made) unless there has been Social Care involvement in which case, it will be longer.
- 24.5. Records are confidential. They may be accessed by the subject of the record but not by any third party other than a Designated Safeguarding Lead and/or the originator.
- 24.6. Staff must not retain any records relating to a safeguarding issue.

25. Safer Recruitment of Staff

- 25.1. The college undertakes all possible actions to ensure that its employees are fit to work with children and vulnerable adults.
- 25.2. The college has safer recruitment procedures in place to prevent unsuitable people from working with children and vulnerable adults and promote safe practice.
- 25.3. Changes to the Protection of Freedoms Act which came into force in September 2012 have resulted in a new definition of regulated activity which determines when disclosure and barred list checks may be undertaken.
- 25.4. 'Keeping Children Safe in Education' (2020) describes the checks that are, or may be, required for any individual working in college.
- 25.5. The measures to be taken in respect of staff, volunteers, contractors and others who may come into contact with our students are listed at [Annex B](#).
- 25.6. In accordance with the regulations, a single central record is kept of all checks and disclosures carried out.

26. Training of Staff

- 26.1. Designated staff receive multi-agency safeguarding training every 2 years, and their knowledge and skills are refreshed regularly, and at least annually, to ensure they are up-to-date with developing local and national priorities.
- 26.2. All other staff and governors receive mandatory training as part of their induction and refreshed every two years, to ensure they are aware of their safeguarding responsibilities and of the college's policies and procedures. The training includes recognising signs of abuse, and recording and reporting suspected abuse. They receive updates on safeguarding and child protection at least annually.

- 26.3. All staff are required to read Part 1 and Annex B of Keeping Children Safe in Education (2021) and the Professional Boundaries document.
- 26.4. For staff members who do not work directly with our students, for example, cleaning staff, the College will ensure that they have read Annex A of Keeping Children Safe in Education (2021) which is the condensed version of Part 1.
- 26.5. All staff should be familiar with 'What to do if you are worried a child is being abused'.
- 26.6. Staff will be expected to undertake training on Contextual Safeguarding and Online Safety.

27. Safe Practice

- 27.1. The College ensures that all staff are safe and aware of behaviours which should be avoided.
- 27.2. Safe working practice ensures that all staff:
 - are responsible for their own actions and behaviour and should avoid any conduct which would lead any reasonable person to question their motivation and intentions
 - work in an open and transparent way
 - discuss and/or take advice from the Designated Safeguarding Lead or Deputy over any incident which may give rise to concern
 - record any incidents or decisions made
 - apply the same professional standards regardless of gender, sexuality or ethnicity
 - are aware that breaches of the law and other professional guidelines could result in criminal or disciplinary action being taken against them
 - undertake appropriate risk assessments for their work area

28. Allegations of Abuse against Staff

- 28.1. The college has in place a Professional Boundaries document which sets out clearly its expectations in terms of staff behaviours and provides guidance to staff on keeping themselves safe. Nevertheless, allegations against staff may occur.
- 28.2. Netiquette Guidelines for Staff have been produced to ensure that staff also keep themselves safe when liaising with students online, both when teaching and providing 1-1 sessions.
- 28.3. All allegations and concerns will be taken seriously and dealt with according to the relevant statutory guidance.
- 28.4. Where an allegation of abuse is made against a member of staff, the relevant disciplinary procedures may be invoked as well as reporting the case to the appropriate authorities, normally the Local Authority Designated Officer (LADO). Following this, any investigation taken under Local Safeguarding Children's Board procedures or by the Police must take precedence over internal college procedures.

- 28.5. Any such allegation must be reported to the Safeguarding Team, as soon as possible. The Designated Safeguarding Lead will refer the matter to the HR Department who will, if appropriate, report it to the LADO.
- 28.6. If an allegation of abuse is made against a designated member of staff, the allegation must be referred directly to the HR Department who will report the matter to the appropriate authorities. An allegation against the Principal must be dealt with by a member of the Board of Governors.
- 28.7. Where an allegation is made by a student aged 18+, it will be investigated through internal college procedures, unless the student is deemed to be a vulnerable adult.
- 28.8. If it is subsequently found that a student has made a false allegation, or that the allegation was prompted by the student's inappropriate behaviour, the matter will be investigated through the Student Disciplinary Procedures.
- 28.9. Staff also have a duty to report any issue in their personal life that may constitute a safeguarding issue and this should be reported to their manager and HR at the earliest possible opportunity.

29. Support for the Safeguarding Team

- 29.1 The Safeguarding Team will be given supervision from a trained counsellor on a monthly basis, or more regularly depending on a case that has been dealt with.
- 29.2 The Safeguarding supervision will be a regular, planned, accountable two-way process which should offer emotional support and develop the knowledge, skills and values of an individual, group or team. Its purpose is to monitor the progress of professional practice and to help staff to improve the quality of the work they do, thus improving outcomes for children as well as achieving agreed objectives.

30. Support for Staff

- 30.1. This policy document is available to all staff via Connect and the college websites. An up to date list of the Safeguarding team is available on Connect and on display within key areas of each site.
- 30.2. Where a member of staff finds a disclosure particularly distressing, they may wish to seek support through the Employee Assistance Programme (EAP). Details of the EAP are available on Connect or from Human Resources. Alternatively, they may talk through their concerns with a Designated Safeguarding Lead or with Human Resources.
- 30.3. A Professional Boundaries document is in place and was developed in consultation with staff. It outlines expected standards of conduct for staff when working with children and vulnerable adults, and provides support and guidance on professional boundaries and keeping themselves safe.

- 30.4. Any member of staff who have dealt with a safeguarding concern will be offered counselling supervision, should they require it.

31. Safeguarding Groups

- 31.1. A cross-college safeguarding committee meets three times per year. It includes representation from across the college including the Designated Safeguarding Lead, Director of Student Services, the Designated Governor and representatives from teaching and support areas.
- 31.2. The group reports to the college Executive and Corporation and its terms of reference include monitoring the effectiveness of the college's safeguarding arrangements, advising on the development and review of related policies, and developing a safeguarding plan.
- 31.3. The safeguarding group concerns itself with the wider safeguarding agenda which includes matters such as bullying, internet safety, safe learning environments, drug and alcohol misuse, and student awareness of personal safety.
- 31.4. The designated safeguarding teams across Bedfordshire and Northamptonshire meets termly to share best practice, develop, review and ensure consistency of procedures, and to consider feedback from the local safeguarding children board.

32. Preventing Violent Extremism – The 'Prevent' Agenda

- 32.1. The Counter-Terrorism and Security Act (2015) places duties on the college to take best endeavours to prevent students from being drawn into terrorist and extremist activity, and statutory guidance is in place. In College, Prevent is embedded within our safeguarding procedures, and this document should therefore be read in conjunction with the Prevent Policy.
- 32.2. Staff and Governors will be trained through the Workshop for Raising Awareness of Prevent (WRAP) programme.
- 32.3. Staff should be aware of the signs of extremism and report any such concerns through the safeguarding process. The College will take such concerns and take action as is necessary, including referring to our local Police contacts, the Channel panel, the multi-agency support hub and/or providing support through our own internal structures.
- 32.4. The College will also promote the ethos of the 'Prevent' agenda by encouraging free and open debate but challenging extreme views. Through its classroom practice, theme weeks and induction activities, it will encourage equality of opportunity and celebrate diversity.
- 32.5. The College will not host or allow its premises to be used by extreme groups and will seek to prevent the distribution of extreme literature. Promotion of any organisations linked to violent extremism is contrary to the values of the College and would constitute misconduct.
- 32.6. Computer searches will be monitored and any key words will be flagged to the Safeguarding Team. Where appropriate, these will be investigated.

33. Early Help

- 33.1 Our students may benefit from early help depending on their circumstances.
- 33.2 Early Help is where all professionals involved with that individual and their families come together to put support in place to ensure that further problems cannot arise.
- 33.3 Any member of staff working with a student may be asked to contribute towards an early help assessment and subsequent meetings.
- 33.4 Referrals for early help for a student and their family can be made via the appropriate Local Authority and this should be made with the approval of the Designated Safeguarding Lead or Deputy.
- 33.5 Further details on the Early Help process can be found in [Working Together to Safeguard Children 2018](#).

34. Students with Social Worker Involvement

- 34.1 The Safeguarding Team will hold information on students where there has been social worker involvement to ensure that any decisions can be made in the best interests of the child's safety, welfare and educational outcomes.
- 34.2 This information will be used to inform decisions about safeguarding and promoting welfare
- 34.3 Students with social worker involvement will be flagged on the Learner Management System, as well as a confidential comment added to ProMonitor to allow for easy identification by the Safeguarding Team.

35. Students Requiring Mental Health Support

- 35.1 The College recognises that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.
- 35.2 The College has a Fitness to Study Policy to ensure that these students are not disadvantaged in any way and that reasonable adjustments can be made to their programme of study.
- 35.3 The College has a team of Mental Health First Aiders to support the health and wellbeing of this cohort of students. A full list can be found on the Mental Health Connect page
- 35.4 The College is continuously building a range of resources for staff and students to support good mental health.

36. Looked After Children / Children in Care / Previously Looked After / Leaving Care

- 36.1. Local Authorities work closely with the Colleges to promote the educational achievement of Looked after Children / Children in Care / Previously Looked After and Leaving Care.

- 36.2. Looked After Children are regularly supported by a team of external agencies and have a Personal Education Plan (PEP). The PEP is used to support the personalised learning of the child – both academically and otherwise. Staff will be asked to contribute to the PEP and where possible, attend meetings regarding that student.
- 36.3. Looked After Children / Children in Care / Previously Looked After / Leaving Care must be regularly monitored and supported whilst they are at College. Staff will be required to provide updates to the Designated Teacher for Looked after Children – Fiona Phillip.
- 36.4. Attendance for Looked After Children / Children in Care will be monitored weekly by the Safeguarding Team.
- 36.5. The Designated Teacher for Looked after Children will meet on a regular basis with the Virtual School Head to promote the educational achievement of this group of vulnerable students.

Annex A – Specific Safeguarding Issues

Extracted from Keeping Children Safe in Education - 2021

Child Abduction and Community Safety Incidents

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

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

As children get older and are granted more independence (for example, as they start walking to school on their own) it is important they are given practical advice on how to keep themselves safe. Many schools provide outdoor-safety lessons run by teachers or by local police staff.

It is important that lessons focus on building children's confidence and abilities rather than simply warning them about all strangers. Further information is available at:

www.actionagainstabduction.org and www.clevernevergoes.org.

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.

They 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, 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 or college's unauthorised absence and children missing from education procedures.

For further information, please visit the Missing Student Procedure.

Children with Family Members in Prison

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

Child Criminal Exploitation (CCE)

CCE is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial or other advantage of the perpetrator or facilitator and/or (c) through violence or the threat of violence. The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact; it can also occur through the use of technology.

CCE can include children being forced to work in cannabis factories, being coerced into moving drugs or money across the country (county lines, see page 106 for more information), forced to shoplift or pickpocket, or to threaten other young people.

Some of the following can be indicators of CCE:

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

Child Sexual Exploitation (CSE)

CSE occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child 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. CSE does not always involve physical contact; it can also occur through the use of technology. CSE can affect any child or young person (male or female) under the age of 18 years, including 16 and 17 year olds who can legally consent to have sex. It can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity and may occur without the child or young person's immediate knowledge (e.g. through others copying videos or images they have created and posted on social media). The above CCE indicators can also be indicators of CSE, as can:

- children who have older boyfriends or girlfriends; and
- children who suffer from sexually transmitted infections or become pregnant.

County Lines

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

Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to move [and store] drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children can be targeted and recruited into county lines in a number of locations including schools, further and higher educational institutions, pupil referral units, special educational needs schools, children's homes and care homes. Children are often recruited to move drugs and money between locations and are known to be exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection. Children can easily become trapped by this type of exploitation as county lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

One of the ways of identifying potential involvement in county lines are missing episodes (both from home and school), when the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism should be considered. If a child is suspected to be at risk of or involved in county lines, a safeguarding referral should be considered alongside consideration of availability of local services/third sector providers who offer support to victims of county lines exploitation. Like other forms of abuse, child criminal exploitation, including county lines:

Further information on the signs of a young person's involvement in county lines is available in guidance published by the Home Office.

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.

Children and young people can be victims of domestic abuse both in the context of their home life where domestic abuse occurs between parents or carers, but also within their own intimate personal relationships. Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children and young people. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Operation Encompass

Operation Encompass operates in the majority of police forces across England. It helps police and schools work together to provide emotional and practical help to children. The system ensures that when police are called to an incident of domestic abuse, where there are children in the household who have experienced the domestic incident, the police will inform the key adult (usually the designated safeguarding lead) in school before the child or children arrive at school the following day. This ensures that the school has up to date relevant information about the child's circumstances and can enable support to be given to the child according to their needs. Police forces not signed up to operation encompass will have their own arrangements in place.

National Domestic Abuse Helpline

Refuge runs the National Domestic Abuse Helpline, which can be called free of charge and in confidence, 24 hours a day on 0808 2000 247. Its website provides guidance and support for potential victims, as well as those who are worried about friends and loved ones. It also has a form through which a safe time from the team for a call can be booked.

Additional 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, 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 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 circumstances. 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.

So-Called 'Honour-Based' Abuse (including Female Genital Mutilation and Forced Marriage)

So-called 'honour-based' abuse (HBA) 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 HBA 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 HBA, or already having suffered HBA.

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 multiagency 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).

Female Genital Mutilation (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 health and social care professionals in England and Wales, to report to the Police where they

discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Those failing to report such cases will face disciplinary sanctions. It will be rare for teachers to see visual evidence, and they should not be examining pupils, 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.

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 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.

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, with 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 email fmufco.gov.uk.

Preventing Radicalisation

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

- **Extremism** 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.
- **Radicalisation** refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.
- **Terrorism** is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat **must** be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

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 school's or college's designated safeguarding lead (and any deputies) should be aware of local procedures for making a Prevent referral.

The Prevent Duty (*Currently in Consultation so may change*)

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.

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.

Channel

Channel is a voluntary, confidential support programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. Prevent referrals may be passed to a multi-agency Channel panel, who will discuss the individual referred to determine whether they are vulnerable to being drawn into terrorism and consider the appropriate support required. A representative from the school or college may be asked to attend the Channel panel to help with this assessment. An individual's engagement with the programme is entirely voluntary at all stages.

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.

The Home Office has developed three e-learning modules:

- Prevent awareness e-learning offers an introduction to the Prevent duty.
- Prevent referrals e-learning supports staff to make Prevent referrals that are robust, informed and with good intention.
- Channel awareness e-learning is aimed at staff who may be asked to contribute to or sit on a multi-agency Channel panel.

Educate Against Hate is a government website designed to support school teachers and leaders to help them safeguard their students from radicalisation and extremism. The platform provides free information and resources to help school staff identify and address the risks, as well as build resilience to radicalisation.

For advice specific to further education, the Education and Training Foundation hosts the Prevent for FE and Training. This hosts a range of free, sector specific resources to support further education settings comply with the Prevent duty. This includes the Prevent Awareness e-learning, which offers an introduction to the duty, and the Prevent Referral e-

learning, which is designed to support staff to make robust, informed and proportionate referrals.

The ETF Online Learning environment provides online training modules for practitioners, leaders and managers, support staff and governors/Board members outlining their roles and responsibilities under the duty.

Peer on Peer / Child on Child 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.

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.

For more information on the college’s processes, please visit the Sexual Violence and Sexual Harassment Policy & Procedures.

Upskirting

The Voyeurism (Offences) Act, which is commonly known as the Upskirting Act, came into force on 12 April 2019. ‘Upskirting’ is where someone takes a picture under a person’s clothing (not necessarily a skirt) without their permission and/or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is a criminal offence. Anyone of any gender, can be a victim.

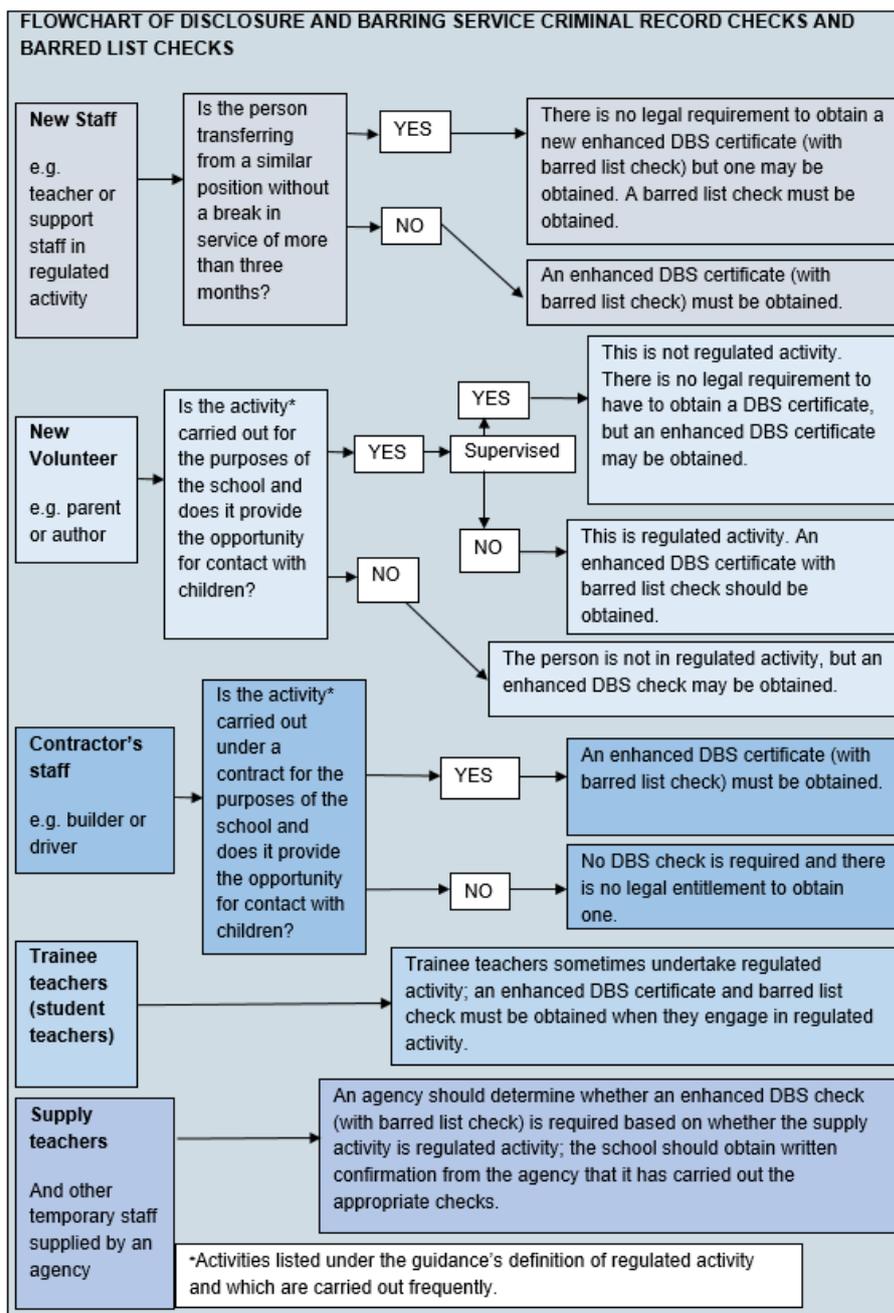
For more detailed information on Sexual Violence and Sexual Harassment, please see Part 5 of [Keeping Children Safe in Education 2021](#) or [Sexual violence and sexual harassment between children in schools and colleges 2018](#).

Annex B - Safer Recruitment Guidance

Flowchart of Disclosure and Barring Service criminal record checks and barred list checks

These guidelines set out minimum requirements in line with current statutory guidelines on **‘Keeping Children Safe in Education’**. They apply to employees, workers, self-employed contractors, companies providing services, third party providers of services on our premises, volunteers and visitors/delegates.

Queries on any situation not covered below are to be referred to Human Resources.



The requirements for staff working out of normal teaching hours with residential students in halls of residence are as specified in The National Minimum Standards for FE Colleges which accommodate under 18s.

Regulated activity

The full legal definition of regulated activity is set out in Schedule 4 of the Safeguarding Vulnerable Groups Act 2006 as amended by the Protection of Freedoms Act 2012.

Regulated activity includes:

- a) teaching, training, instructing, caring for (see (c) below) or supervising children if the person is unsupervised, or providing advice or guidance on physical, emotional or educational well-being, or driving a vehicle only for children;
- b) work for a limited range of establishments (known as 'specified places', which include schools and colleges), with the opportunity for contact with children, but not including work done by supervised volunteers.

Work under (a) or (b) is regulated activity only if done regularly. Some activities are always regulated activities, regardless of frequency or whether they are supervised or not. This includes:

- c) relevant personal care, or health care provided by or provided under the supervision of a health care professional:
 - i. personal care includes helping a child with eating and drinking for reasons of illness or disability or in connection with toileting, washing, bathing and dressing for reasons of age, illness or disability;
 - ii. health care means care for children provided by, or under the direction or supervision of, a regulated health care professional.

Regulated activity will not be:

- paid work in specified places which is occasional and temporary and does not involve teaching, training; and
- supervised activity which is paid in non-specified settings such as young clubs, sports clubs etc.

Source: DFE Keeping Children Safe in Education (2020)

Annex C – Safeguarding Children and Vulnerable Adults – Summary for Staff

Everyone’s Responsibility

The College and every member of staff have a legal duty to report cases of suspected abuse. If you have concerns that a child or vulnerable adult is at risk, or is being abused, you must report it.

Definitions

A **child** refers to anyone up to their 18th birthday.

A **vulnerable adult** is a person aged 18 years or over who may be unable to take care of themselves or protect themselves from harm or exploitation. They would normally be in receipt of services classed as ‘regulated activity’, including health and personal care or support required because of age, illness or disability.

What is abuse?

Children and vulnerable adults can be subject to:

- Physical abuse
- Sexual abuse
- Emotional abuse
- Neglect
- Financial or material abuse
- Domestic violence
- Forced marriage
- Bullying or cyber-bullying
- Being drawn into terrorism or violent extremism.

Recognising Abuse

Physical abuse	
<i>Physical abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child.</i>	
Child	
Bruises – shape, grouping, site, repeat or multiple	Withdrawal from physical contact
Bite-marks – site and size Burns and Scalds – shape, definition, size, depth, scars	Aggression towards others, emotional and behaviour problems
Improbable, conflicting explanations for injuries or unexplained injuries	Frequently absent from school
Untreated injuries	Admission of punishment which appears excessive
Injuries on parts of body where accidental injury is unlikely	Fractures
Repeated or multiple injuries	Fabricated or induced illness

Parent	Family/environment
Parent with injuries	History of mental health, alcohol or drug misuse or domestic violence.
Evasive or aggressive towards child or others	Past history in the family of childhood abuse, self-harm, somatising disorder or false allegations of physical or sexual assault
Explanation inconsistent with injury	Marginalised or isolated by the community.
Fear of medical help / parents not seeking medical help	Physical or sexual assault or a culture of physical chastisement.
Over chastisement of child	
Emotional abuse	
<i>Emotional abuse is 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 children that they are worthless or unloved, not giving the child opportunities to express their views, 'making fun' of what they say or how they communicate - hearing the ill-treatment of another and serious bullying (including cyber bullying).</i>	
Child	
Self-harm	Over-reaction to mistakes / Inappropriate emotional responses
Chronic running away	Abnormal or indiscriminate attachment
Drug/solvent abuse	Low self-esteem
Compulsive stealing	Extremes of passivity or aggression
Makes a disclosure	Social isolation – withdrawn, a 'loner' Frozen watchfulness particularly pre school
Developmental delay	Depression
Neurotic behaviour (e.g. rocking, hair twisting, thumb sucking)	Desperate attention-seeking behaviour
Parent	Family/environment
Observed to be aggressive towards child or others	Marginalised or isolated by the community.
Intensely involved with their children, never allowing anyone else to undertake their child's care.	History of mental health, alcohol or drug misuse or domestic violence.
Previous domestic violence	History of unexplained death, illness or multiple surgery in parents and/or siblings of the family
History of abuse or mental health problems	Past history in the care of childhood abuse, self harm, somatising disorder or false allegations of physical or sexual assault
Mental health, drug or alcohol difficulties	Wider parenting difficulties
Cold and unresponsive to the child's emotional needs	Physical or sexual assault or a culture of physical chastisement.
Overly critical of the child	Lack of support from family or social network.
Neglect	
<i>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.</i>	
Child	
Failure to thrive - underweight, small stature	Low self-esteem
Dirty and unkempt condition	Inadequate social skills and poor socialisation
Inadequately clothed	Frequent lateness or non-attendance at school
Dry sparse hair	Abnormal voracious appetite at school or nursery
Untreated medical problems	Self-harming behaviour
Red/purple mottled skin, particularly on the hands and feet, seen in the winter due to cold	Constant tiredness

Swollen limbs with sores that are slow to heal, usually associated with cold injury	Disturbed peer relationships
Parent	Family/environment
Failure to meet the child's basic essential needs including health needs	Marginalised or isolated by the community.
Leaving a child alone	History of mental health, alcohol or drug misuse or domestic violence.
Failure to provide adequate caretakers	History of unexplained death, illness or multiple surgery in parents and/or siblings of the family
Keeping an unhygienic dangerous or hazardous home environment	Past history in the family of childhood abuse, self harm, somatising disorder or false allegations of physical or sexual assault
Unkempt presentation	Lack of opportunities for child to play and learn
Unable to meet child's emotional needs	Dangerous or hazardous home environment including failure to use home safety equipment; risk from animals
Mental health, alcohol or drug difficulties	
Sexual abuse	
<i>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 or non-contact activities, such as involving children in looking at sexual images or being groomed on line / child exploitation.</i>	
Child	
Self-harm - eating disorders, self-mutilation and suicide attempts	Poor self-image, self-harm, self-hatred
Running away from home	Inappropriate sexualised conduct
Reluctant to undress for PE	Withdrawal, isolation or excessive worrying
Pregnancy	Sexual knowledge or behaviour inappropriate to age/stage of development, or that is unusually explicit
Inexplicable changes in behaviour, such as becoming aggressive or withdrawn	Poor attention/concentration (world of their own)
Pain, bleeding, bruising or itching in genital and /or anal area	Sudden changes in school work habits, become truant
Sexually exploited or indiscriminate choice of sexual partners	
Parent	Family/environment
History of sexual abuse	Marginalised or isolated by the community
Excessively interested in the child	History of mental health, alcohol or drug misuse or domestic violence
Parent displays inappropriate behaviour towards the child or other children	History of unexplained death, illness or multiple surgery in parents and/or siblings of the family
Conviction for sexual offences	Past history in the care of childhood abuse, self-harm, somatising disorder or false allegations of physical or sexual assault
Comments made by the parent/carer about the child	Grooming behaviour
Lack of sexual boundaries	Physical or sexual assault or a culture of physical chastisement.

What to do

If you have any concerns about a child or vulnerable adult you must:

- talk to them about these concerns
- listen carefully to what you are being told. Questions should be kept to the minimum required for clarity, and leading questions must be avoided. not ask leading questions
- advise the student that this information cannot be kept confidential and will be passed on to a designated member of staff in college who has been trained to deal with such matters
- make a written record of the conversation on the Confidential Comments section of ProMonitor, including
 - date and time of report
 - date, time and place of alleged abuse
 - name of complainant
 - name of child alleged to have been abused, if different from above
 - nature of alleged abuse
 - description of any injuries observed, if any
 - any other information given, including siblings if relevant
 - distinguish between observation, fact and opinion
 - confirmation that the student has been advised of the next steps
- tell the student what you are doing and why

Who to contact

Sharon De Leonardis Governor for Child Protection & Safeguarding

Bedford Sites:

Em Lowe	Vice Principal & Designated Safeguarding Lead	01234 291908
Saima Nasir	Student Achievement & Wellbeing Manager	01234 291915
Katrina O'Brien	Head of Foundation & ALS (Vulnerable Adults)	01234 291652
Ashley Spiers	Lecturer	01234 291432
Marie Hennem	A2FE Manager	01234 291057
Calum Atterwill	Personal Achievement Tutor	01234 291244
Naomi Horn	Student Participation Advisor	
Zhunia Zuze	Student Services Adviser	01234 291444

Trinity Arts and Leisure:

Amanda Riches	BCS Deputy General Manager	01234 291778
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Shuttleworth:

Will Sparrow	Student Experience & Progression Manager	01234 291277
Charlotte Harris	Halls of Residence Tutor	01234 291279

Tresham:

Fiona Phillip	Director of Student Services	01536 413373
Erica Knight	Curriculum Administrator Team Leader	01536 413296
Simone Newman	Head of Student Services	01536 413157
Naj Mistry	Student Achievement & Wellbeing Manager	01536 413059
Kimberley Cooper	Delivery Manager – Apprenticeships	01536 413526

Further information and guidance on safeguarding are available on Connect.

Annex D - Safeguarding at Trinity Arts and Leisure - Guidance for Staff

The principles of the Bedford College Safeguarding Policy and Procedures apply to users of the Trinity Arts and Leisure complex. What follows is guidance for staff on the management of safeguarding incidents specifically relating to that context.

1. General Guidance

- Signs of neglect or abuse may be more obvious in a sporting/swimming pool environment and staff have a duty to act if they have any safeguarding concerns.
- Staff must report any concerns they have, no matter how small they think they are. If the observation, allegation or disclosure of abuse occurs on poolside, the duty manager or designated safeguarding staff member should be informed. If immediate assistance is not available and the incident is urgent, team support should be requested by radio or, exceptionally, using the pool alarm.
- When using the radio, information about the situation, allegation or disclosure should not be disclosed by radio. Immediate assistance only must be requested.
- If a child or vulnerable adult wishes to speak to an individual member of staff every effort should be made to allow this to happen. However it is important to remain visible at all times, in sight of other staff members.
- Staff should listen and record the facts but not ask leading questions. Incident report forms are held in the safeguarding folder in the Trinity Arts and Leisure reception. These must be used to record concerns and any further action taken.
- If staff have concerns about a suspected abuser, they should be careful of questioning and wording used. A description of the person, their name (if it can be ascertained) and the reasons for the concerns should be recorded and passed on to the duty manager/designated safeguarding staff member immediately.
- Bedford College and Trinity Arts and Leisure provide mandatory safeguarding training to managers, swim teachers and lifeguards.

2. Schools and Club Sessions

- During school bookings the school is responsible for the children in their care. The children whilst in the changing room are not to be left unattended at any point. This may require two or more persons per changing room so that, if required, one can leave to enter the communal area.
- Any concerns identified by TAL managers or lifeguards during the booking should be raised with the school staff. Do not assume they know.
- If you are not satisfied that the concern is being dealt with appropriately by the school staff, refer the matter to the TAL duty manager/designated safeguarding staff member. They should discuss the concerns with the designated safeguarding teacher at the school. Complete an incident report form found in safeguarding folder in TAL reception.
- If you suspect abuse, or abuse is disclosed and allegedly happened at TAL, it must be reported to the duty manager/designated safeguarding staff member at TAL who will take appropriate action.

3. Swimming Sessions

- If the child or vulnerable adult is known, record their name and as many details as possible regarding the incident or disclosure. Information on children in School of Fish swimming lessons can be obtained through the TAL database. Registers can also be used to monitor attendance.
- If the child or vulnerable adult is not known, try to ascertain through careful questioning. If this is not possible, record a description and as much detail as possible.
- Never ask leading questions.
- Stay in a visible location so you are never completely alone with vulnerable adult or child.
- If child or vulnerable adult is in immediate danger, call the emergency service(s) if necessary.
- Report all information to the TAL designated safeguarding staff member.
- If a parent/carer is present, record a description of the parent and, where possible, their name.

4. Process

This flow chart is a guide and may vary depending on the incident you are faced with. Please be aware you can contact a Trinity Arts and Leisure designated safeguarding person outside working hours if urgent advice or assistance is required.

