

Safeguarding Policy and Procedure 2024

**Reviewed by:**

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# Policy statement and principles

BFMAT has accountability and overall responsibility for the safeguarding of young people and vulnerable adults across its academies. BFMAT assumes a strategic responsibility to ensure compliance at a local level. Each College/Academy has a Safeguarding Policy, overseen by the College/Academy DSL, together with the Senior Leadership Team and the LGB. These Policies will also be reviewed at Trust level by the trustee Safeguarding Leads.

The College will maintain and review an individual Safeguarding Policy, with detailed processes and procedures relevant to each College’s local context. This policy is one of a series in the college’s integrated safeguarding portfolio. This policy is available on the college website and the staff portal.

“At Gateway College we are committed to safeguarding and promoting the welfare of young people and vulnerable adults and we expect our staff and all those associated with the College to share this commitment.”

Our core safeguarding principles are:

* safeguarding is everyone’s responsibility.
* the college’s responsibility to safeguard and promote the welfare of young people is of paramount importance.
* safer young people make more successful learners.
* policies will be reviewed at least annually unless an incident or new legislation or guidance suggests the need for an interim review.

## Safeguarding statement

We recognise our moral and statutory responsibility to safeguard and promote the welfare of all students. We endeavour to provide a safe and welcoming environment where young people are respected and valued. We are alert to the signs of abuse and neglect and follow our procedures to ensure that young people receive effective support, protection, and justice. The procedures contained in this policy apply to all staff, volunteers and governors and are consistent with those of the local safeguarding partner arrangements.

### Policy principles

* The welfare of the young person is paramount.
* All young people, regardless of age, gender, ability, culture, race, language, religion, or sexual identity, have equal rights to protection.
* All staff have an equal responsibility to act on any suspicion or disclosure that may suggest a young person is at risk of harm.
* All staff will reassure young people that their concerns and disclosures will be taken seriously and that they will be supported and kept safe.
* Students and staff involved in child protection issues will receive appropriate support.

### 1.2. Policy aims

* To provide all staff with the necessary information to enable them to meet their child protection responsibilities.
* To ensure consistent good practice.
* To demonstrate the college’s commitment regarding child protection to students, parents, and other partners.

**Terminology**

**Safeguarding** and promoting the welfare of young people refers to the process of protecting young people from maltreatment ***whether that is within or outside the home, including online***, p***roviding help and support to meet the needs of children as soon as problems emerge,*** preventing the impairment of mental and physical health or development, ensuring that young people grow up in circumstances consistent with the provision of safe and effective careand taking action to enable all young people to have the best outcomes.

**Child protection** refers to the processes undertaken to protect young people who have been identified as suffering or being at risk of suffering significant harm.

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

**DSL** refers to the designated safeguarding lead at the college.

**Child or young person** includes everyone under the age of 18.

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

# Safeguarding legislation and guidance

The following safeguarding legislation and guidance has been considered when drafting this policy:

* Section 157 of the Education Act 2002 (Independent colleges only, including academies and Free Colleges)
* The Education (Independent College Standards) Regulations 2014 (Independent colleges only, including academies and Free Colleges)
* The Safeguarding Vulnerable Groups Act 2006
* The Teacher Standards 2012
* Working Together to Safeguarding Children 2018
* Working Together: Transitional Guidance 2024
* Keeping Children Safe in Education 2024
* What to do if you’re worried a child is being abused 2015.
* The Domestic Abuse Act 2021
* PACE Code C 2019

# Roles and responsibilities

**Key personnel**

The designated safeguarding **lead (DSL)** for child protection is **Sam Keen**

 email: **skeen@Gateway.ac.uk** tel: 01162744561 – Focus Knife Crime and CCE

The **deputy designated leads (DDSL)**, including their focus are**:**

Nicola Martin – nmartin@gateway.ac.uk tel: 01162744561 – Staff

Kerry Reeve – kreeve@gateway.ac.uk tel: 07944856849 – Entry to Employment

Helen Herries – hherries@gateway.ac.uk tel: 07442503089 – Mental Health

Marcus Benjamin – mbenjamin@gateway.ac.uk tel: 07436530542 – Events/Child on Child

Hannah Bishop – hbishop@gateway.ac.uk tel: 07399904775 – Children Looked After

Kiran Kaur – kkaur@gateay.ac.uk tel: 07791561763 – Student Welfare and Safeguarding

Vikram Goraniya – vgoraniya@gateway.ac.uk tel: 07376167559 – Entry to Employment

The nominated **safeguarding governor** is **Nelista Cuffy** - email: ncuffy@Gateway.ac.uk

The Principal is **James Bagley** -email: jbagley@Gateway.ac.uk

## The designated safeguarding lead (DSL)

The designated safeguarding lead (DSL) takes **lead responsibility** for safeguarding and child protection (including online safety) in the college. The DSL has the status and authority within the college to carry out the duties of the post, which include:

* ensuring the safeguarding policies are known, understood, and used appropriately by staff, reviewed annually and publicly available.
* advising and supporting staff on child protection and safeguarding matters
* encouraging a culture of listening to young people
* managing safeguarding referrals to children’s social care, the police, or other agencies
* liaising with the principal/deputy principal regarding ongoing enquiries under section 47 of the Children Act 1989 and police investigations and be aware of the requirement for young people to have an appropriate adult in relevant circumstances (Appendix five)
* taking part in strategy discussions and inter-agency meetings
* liaising with the “case manager” and the designated officer(s) at the local authority where allegations are made against staff.
* making staff aware of training courses and the latest local safeguarding arrangements available through the local safeguarding partner arrangements
* undergoing training and receiving regular updates to maintain the knowledge and skills required to carry out the role, including Prevent awareness training.
	1. The deputy designated safeguarding lead(s) DDSL’s:

DDSL’s are trained to the same level as the DSL and they support the DSL with safeguarding matters as appropriate. In the absence of the DSL, the deputy DSL carries out those functions necessary to ensure the ongoing safety and protection of students. In the event of the long-term absence of the DSL, the DDSL(s) will assume the functions above.

# Good practice guidelines and staff code of conduct

[BFMAT Code of Conduct](https://gatewaycollege-my.sharepoint.com/%3Ab%3A/g/personal/skeen_gateway_ac_uk/EZ4XLfTWu6dHg5Mk0wtTnzkBSPbICEyAavE1ZFkaCm25Kg?e=cmaZw1)

Good practice includes:

* treating all students with respect
* setting a good example by conducting ourselves appropriately
* involving students in decisions that affect them.
* encouraging positive, respectful, and safe behaviour among students
* being a good listener
* being alert to changes in students’ behaviour and to signs of abuse, neglect, and exploitation
* recognising that challenging behaviour may be an indicator of abuse.
* reading and understanding the college’s safeguarding policy, code of conduct and guidance documents on wider safeguarding issues
* being aware that the personal and family circumstances and lifestyles of some students lead to an increased risk of abuse.
* referring all concerns about a student’s safety and welfare to the DSL, or, if necessary, directly to police or children’s social care.

# Abuse of position of trust

All college staff are aware that inappropriate behaviour towards students is unacceptable and that their conduct towards students must be beyond reproach.

Staff 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 any sexual activity between a member of the college staff and a student under 18 may be a criminal offence.

**The college’s code of conduct and the professional boundaries with former students’ policy sets out our expectations of staff.**

# Young people who may be particularly vulnerable

Some young people may have an increased risk of abuse. Many factors can contribute to an increase in risk, including prejudice and discrimination, isolation, social exclusion, communication issues and reluctance on the part of some adults to accept that abuse can occur. To ensure that our students receive equal protection, we will give special consideration to young people who are:

* living away from home or in temporary accommodation
* living in chaotic and unsupportive home situations
* living transient lifestyles
* affected by parental substance misuse, domestic abuse, or parental mental health needs.
* vulnerable to being bullied or engaging in bullying.
* vulnerable to discrimination and maltreatment on the grounds of race, ethnicity, religion, disability, or sexuality
* do not have English as a first language.
* at risk of sexual exploitation, female genital mutilation, forced marriage or being drawn into extremism.
* at risk of being permanently excluded from college
* has a parent or carer in custody, or is affected by parental offending, which may further acknowledge arrests and not imprisonment, i.e. taken into custody after a domestic incident, but not formally charged.

This list provides examples of additionally vulnerable groups and is not exhaustive. Special consideration includes the provision of safeguarding information and resources in community languages and accessible formats for young people with communication needs.

# Young people with special educational needs and disabilities

Young people with special educational needs (SEN) and disabilities can face additional safeguarding challenges. Additional barriers can exist when recognising abuse, neglect, and exploitation in this group of young people, which can include:

* assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the young person’s disability without further exploration.
* the potential for young people with SEN and disabilities being disproportionally impacted by behaviours such as bullying, without outwardly showing any signs; and
* communication barriers and difficulties in overcoming these barriers.

Staff are trained to manage these additional barriers to ensure this group of young people are appropriately safeguarded.

# Young people who are absent from education

Attendance, absence, and exclusions are closely monitored. A young person being absent from education for reasons that are ***unexplained and/or prolonged/repeated/persistent absences from education***’. **NB:** this includes half days - it doesn’t have to be a full day absent, and a young person going missing from education is a potential indicator of abuse and neglect, including sexual abuse or exploitation, child criminal exploitation or mental health problems. (*Keeping Children Safe in Education (DfE, 2024)*. The DSL will monitor unauthorised absence and take appropriate action for young people who are absent or go missing on repeated occasions and/or are missing for periods during the college day. Staff must also be alert to signs of young people at risk of travelling to conflict zones, female genital mutilation and forced marriage.

# Mental health

Colleges have an important role to play in supporting the mental health and wellbeing of their students.

All staff are aware that mental health problems can be an indicator that a young person has suffered or is at risk of suffering abuse, neglect, or exploitation. Staff are also aware that where young people have suffered adverse childhood experiences those experiences can impact on their mental health, behaviour, and education.

Where staff are concerned that a young person’s mental health is also a safeguarding concern, they will discuss it with the senior mental health lead (DSL) or deputy mental health lead (DDSL).

# Young people who are lesbian, gay, bisexual, transgender, or questioning

The fact that a child or a young person may be LGBTQ is not in itself an inherent risk factor harm. Unfortunately, young people who are LGBTQ, or are perceived to be LGBTQ, can be targeted by other young people. The risk to these young people can be compounded where young people who are LGBTQ lack a trusted adult with whom they can be open. Our staff endeavour to reduce the barriers and provide a safe space for those young people to speak out or share their concerns with them. KCSIE (DfE 2024) advise that Families and carers should seek clinical help and advice and the wider vulnerabilities of gender questioning children should be explored such as mental health and SEND.

# Whistleblowing if you have concerns about a colleague

Staff who are concerned about the conduct of a colleague towards a student are undoubtedly placed in a very difficult situation. They may worry that they have misunderstood the situation, and they will wonder whether a report could jeopardise their colleague’s career. All staff must remember that the welfare of the young person is paramount. The college’s confidential reporting code and policy (Whistleblowing), the low-level concerns policy and the low-level electronic reporting tool ***(staff portal)*** enables staff to raise concerns or allegations, initially in confidence and for a sensitive enquiry to take place.

All concerns of poor practice or possible child abuse by colleagues should be reported to the principal or deputy. Complaints about the principal or deputy should be reported to the chair of governors, chair of the management committee or proprietor.

Staff may also report their concerns directly to young people’s social care or the police if they believe direct reporting is necessary to secure action.

# Safeguarding concerns and allegations made about staff, supply staff, contractors, and volunteers.

When a safeguarding concern or allegation is made about a member of staff, including supply staff, contractors, or volunteers, or relates to an incident that happened when an individual or organisation was using our premises for the purposes of running activities for young people our set procedures must be followed. The full procedures for dealing with allegations against staff and managing low level concerns raised about staff can be found in *Keeping Children Safe in Education (DfE, 2024)* and in Gateway college’s Managing Allegations against Staff policy and Procedures for safeguarding concerns and allegations made about staff, supply staff, contractors, and volunteers.

Safeguarding concerns or allegations made about staff who no longer work at the college, or historical allegations will be reported to the police.

# Staff and governor/trustee training

It is important that all staff receive training to enable them to recognise the possible signs of abuse, neglect and exploitation, online safety (including an understanding of the expectations, applicable roles and responsibilities for filtering and monitoring) and to know what to do if they have a concern. All staff sign an annual declaration to say that they have read and understood the KCSIE updates and polices. See Appendices Two for responsibilities.

New staff receive a briefing during their induction, which includes the college’s Safeguarding Policy, Behaviour for Learning Policy, staff code of conduct, Prevent Strategy and the reporting and recording arrangements which include the details for the DSL/DDSL and other policies and training. All staff, including the DSL/DDSL’s, principal, deputy principal and governors will receive training that is regularly updated and tailored to meet needs. All staff will also receive safeguarding and child protection updates via email, Safeguarding Team channel, safeguarding bulletins, and staff briefings/meetings throughout the year.

Our governors/trustees receive appropriate safeguarding and child protection (including online safety and an understanding of the expectations, applicable roles and responsibilities for filtering and monitoring) training at induction which equips them with the knowledge to provide strategic challenge to test and assure themselves that there is an effective whole trust approach to safeguarding. This training is updated at least annually.

Our safeguarding governors receive additional training to empower them to support and challenge the Designated Safeguarding Lead and support the delivery of high-quality safeguarding locally and across the trust.

# Safer recruitment

Our college complies with the requirements of Keeping Children Safe in Education (DfE 2024) and the local safeguarding partner arrangements by carrying out the required checks and verifying the applicant’s identity, qualifications, and work history. The college’s Staff Recruitment and Selection (including Safer Recruitment Requirements) policy and procedures set out the process in full and can be found (available on the staff portal for HR). At least one member of each recruitment panel will have attended safer recruitment training.

The college obtains written confirmation from supply agencies or third-party organisations that supply staff or other individuals who may work in the college have been appropriately checked and are suitable to work with young people.

Trainee teachers will be checked either by the college or by the training provider, from whom written confirmation will be obtained confirming their suitability to work with young people.

The college maintains a single central record of recruitment checks undertaken.

## Volunteers

Volunteers, including governors will undergo checks commensurate with their work in the college, their contact with students and the supervision provided to them. Under no circumstances will a volunteer who has not been appropriately checked be left unsupervised.

* 1. **Letting or hiring premises for non-college activity**

Gateway College has lettings and hiring procedures in place. This includes sharing our safeguarding policy. Our contract with them states how failure to comply with safeguarding would lead to a termination of the contact.

## Contractors

The college checks the identity of all contractors working on site and requests DBS with barred list checks where required by statutory guidance. Contractors who have not undergone checks will not be allowed to work unsupervised during the college day.

# Site security

Visitors to the college, including contractors, are asked to sign in and are given a badge, which confirms they have permission to be on site. All visitors are expected to observe the college’s safeguarding and health and safety regulations. The principal/deputy principal/DSL will exercise professional judgement in determining whether any visitor should be escorted or supervised while on site.

# Extended college and off-site arrangements

All extended and off-site activities are subject to a risk assessment to satisfy health and safety and safeguarding requirements. Where extended college activities are provided by and managed by the college, our own safeguarding policy and procedures apply. If other organisations provide services or activities on our site on behalf of our college, we will check that they have appropriate procedures in place, including safer recruitment procedures.

When our students attend off-site activities, including day and residential visits and work-related activities, we will check that effective safeguarding arrangements are in place.

# Staff/student online relationships

The college provides advice to staff regarding their personal online activity and has strict rules regarding online contact and electronic communication with students. Staff found to be in breach of these rules may be subject to disciplinary action or child protection investigation *(please see staff portal, safeguarding for staff code of conduct.*

# Safeguarding procedures

## Recognising abuse, neglect and exploitation

To ensure that our students are protected from harm, we need to understand what types of behaviour constitute abuse, neglect, and exploitation.

Abuse, neglect and exploitation are forms of maltreatment. Somebody may abuse, neglect, and exploit a young person by inflicting harm, for example by hitting them, or by failing to act to prevent harm, for example by leaving a small child home alone.

Abuse may be committed by adult men or women and by other young people.

Keeping Children Safe in Education (DfE 2024) refers to four categories of abuse. These are set out at Appendix One along with indicators of abuse.

## Bullying

While bullying between young people is not a separate category of abuse, neglect, and exploitation, it is a very serious issue that can cause anxiety and distress. All incidences of bullying, including cyber-bullying and prejudice-based bullying should be reported and will be managed through our Safeguarding Policy.

## Taking action

**Any child, in any family in any college could become a victim of abuse. Staff should always maintain an attitude of “it could happen here”.** Key points for staff to remember for acting are:

* in an emergency take the action necessary to help the young person (including calling 999)
* report your concern as soon as possible to the DSL/DDSL, definitely by the end of the day.
* do not start your own investigation.
* share information on a need-to-know basis only – do not discuss the issue with colleagues, friends, or family.
* the DSL/DDSL will complete a record of concern on a safeguarding Cedar thread.
* seek support for yourself if you are distressed.

## If you are concerned about a student’s welfare

There will be occasions when staff may suspect that a student may be at risk. The student’s behaviour may have changed, their artwork could be bizarre, they may write stories or poetry that reveal confusion or distress, or physical signs may have been noticed. In these circumstances, staff will try to give the student the opportunity to talk and ask if they are OK or if they can help in any way.

Staff should speak to a member of the safeguarding team so that these concerns can be recorded early on a welfare thread. If the student does reveal that they are being harmed, staff should follow the advice below. Following an initial conversation with the student, if the member of staff has concerns, they should discuss their concerns with the DSL/DDSL.

Staff are aware that young people may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. Young people may feel embarrassed, humiliated, or being threatened, which could be due to their vulnerability, disability and/or sexual orientation or language barriers. This will not prevent our staff from having a professional curiosity and speaking to our DSL/DDSL if they have concerns about a young person.

## If a student discloses to you

It takes a lot of courage for a young person to disclose that they are being abused. They may feel ashamed, particularly if the abuse is sexual; their abuser may have threatened what will happen if they tell; they may have lost all trust in adults; or they may believe, or have been told, that the abuse is their own fault. Sometimes they may not be aware that what is happening is abusive.

If a student talks to a member of staff about any risks to their safety or wellbeing, **the staff member will, at the appropriate time, let the student know that to help them they must pass the information on to the DSL/DDSL**. The point at which they tell the student this is a matter for professional judgement. During their conversations with the students, staff will:

* allow them to speak freely.
* remain calm and not overreact.
* give reassuring nods or words of comfort – ‘I’m so sorry this has happened’, ‘I want to help’, ‘This isn’t your fault’, ‘You are doing the right thing in talking to me’.
* not be afraid of silences.
* **under no circumstances** ask investigative questions – such as how many times this has happened, whether it happens to siblings, or what does the student’s mother think about it.
* not automatically offer any physical touch as comfort
* avoid admonishing the young person for not disclosing earlier. Saying things such as ‘I do wish you had told me about this when it started’ may be interpreted by the young person to mean that they have done something wrong.
* tell the student what will happen next.
* report verbally to the DSL/DDSL even if the young person has promised to do it by themselves.
* share your notes with the DSL/DDSL as soon as possible, so that they have an accurate account of what was disclosed.
* DSL/DDSL will complete a safeguarding thread on Cedar and report to appropriate external agencies.
* seek support if they feel distressed.

## Notifying parents

The college will normally seek to discuss any concerns about a student with their parents. This must be handled sensitively, and the DSL/DDSL will contact the parent in the event of a concern, suspicion, or disclosure.

Our focus is the safety and wellbeing of the student. Therefore, if the college believes that notifying parents could increase the risk to the young person or exacerbate the problem, advice will first be sought from young people’s social care and/or the police before parents are contacted.

# **Confidentiality and sharing information**

All staff will understand that safeguarding issues warrant a high level of confidentiality. Staff should only discuss concerns with the DSL/DDSL, principal, deputy principal or chair of governors (depending on who is the subject of the concern). That person will then decide who else needs to have the information and they will disseminate it on a ‘need-to-­know’ basis.

Following several cases where senior leaders in college had failed to act upon concerns raised by staff, *Keeping Children Safe in Education (2024)* emphasises that **any** member of staff can contact children’s social care if they are concerned about a young person.

Safeguarding information will be stored and handled in line with our Retention and Destruction Policy.

Information sharing will take place in a timely and secure manner and where:

* it is necessary and proportionate to do so; and
* the information to be shared is relevant, adequate, and accurate.

Information sharing decisions will be recorded, whether or not the decision is taken to share.

All electronic safeguarding information is password protected (CEDAR) and only made available to relevant individuals.

Safeguarding information will be stored separately from the student’s college file and the college system will be ‘tagged’ on the students CEDAR profile page to indicate that separate safeguarding information is held. (i.e. safeguarding cabinet)

The DSL/DDSL will normally obtain consent from the student and/or parents to share sensitive information within the college or with outside agencies. Where there is good reason to do so, the DSL/DDSL may share information *without* consent, and will record the reason for not obtaining consent.

If any member of staff receives a request from a student or parent to see safeguarding records, they will refer the request to the data protection officer or DSL.

The UK GDPR and the Data Protection Act 2018 do not prevent college staff from sharing information with relevant agencies, where that information may help to protect a young person.

The college’s data protection and cybersecurity policy are available to parents and students on the college website.

# Referral to children’s social care

The DSL/DDSL will make a referral to children’s social care if it is believed that a student is suffering or is at risk of suffering significant harm. The student (subject to their age and understanding) and the parents will be told that a referral is being made, unless to do so would increase the risk to the child.

Any member of staff may make a direct referral to children’s social care if they genuinely believe independent action is necessary to protect a child.

# Reporting directly to child protection agencies

Staff should follow the reporting procedures outlined in this policy. However, they may also share information directly with children’s social care, police, or the NSPCC if:

* the situation is an emergency and the designated safeguarding lead, their deputies, the principal/deputy principal and the chair of governors are all unavailable.
* they are convinced that a direct report is the only way to ensure the student’s safety.
* for any other reason they make a judgement that direct referral is in the best interests of the young person.

# Child-on-child abuse

Children may be harmed by other children or young people. Staff will be aware of the harm caused by bullying and will use the college’s anti-bullying procedures where necessary. However, all staff recognise that children can abuse other children and young people and should be clear about the college’s policy and procedures regarding child-on-child abuse. Staff will maintain an attitude of ‘it could happen here’. All child-on-child abuse is unacceptable and will be taken seriously.

Child-on-child abuse can take many forms, including:

* **physical abuse** such as shaking, biting, hitting, kicking or hair pulling.
* **bullying,** including cyberbullying, prejudice-based and discriminatory bullying.
* **sexual violence and sexual harassment** such as inappropriate sexual language, touching, sexual assault or rape.
* **causing someone to engage in sexual activity without consent,** such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.
* **consensual and non-consensual sharing if nude and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery, AI generated sexual images or videos)** including pressuring another person to send sexual imagery or video content.
* **abuse in intimate personal relationships between peers (also known as teenage relationship abuse)** - such as a pattern of actual or threatened acts of physical, sexual, or emotional abuse.
* **upskirting** – taking a picture under a person’s clothing without their permission for the purposes of sexual gratification or to cause humiliation, distress, or alarm.
* **initiation/hazing** - used to induct newcomers into an organisation such as sports team or college groups by subjecting them to a series of potentially humiliating, embarrassing or abusing trials which promote a bond between them.
* **prejudiced behaviour** - a range of behaviours which causes someone to feel powerless, worthless, or excluded and which relates to prejudices around belonging, identity, and equality, in particular prejudices linked to disabilities, special educational needs, ethnic, cultural, and religious backgrounds, gender, and sexual identity.

Abuse is abuse and should never be tolerated or passed off as ‘banter’, ‘just having a laugh’, ‘part of growing up’ or ‘boys being boys. Tolerance of such behaviours can lead to a culture of unacceptable behaviours and an unsafe environment for young people.

Different gender issues can be prevalent when dealing with child-on-child abuse, for example girls being sexually touched/assaulted or boys being subject to initiation/hazing type violence. However, all staff recognise that it is more likely that girls will be victims of child-on-child abuse and boys are more likely to be the perpetrators.

Staff recognise that even if there are no reported cases of child-on-child abuse, such abuse may still be taking place but simply not being reported.

##  Minimising risk

At our college, we take the following steps to minimise or prevent the risk of child-on-child abuse.

* An open and honest environment where young people feel safe to share information about anything that is upsetting or worrying them.
* Student induction is used to provide a moral framework outlining acceptable behaviour and stressing the effects of bullying.
* Skills and progressions sessions are used to reinforce the message.
* Staff will endeavour always to create surroundings where everyone feels confident and at ease in college.
* We will ensure that the college is well supervised, especially in areas where young people might be vulnerable.

##  Managing allegations of child-on-child abuse

Staff should pass all allegations of child-on-child abuse to the DSL/DDSL immediately. They will then be investigated and dealt with as follows.

* **Information gathering** – young people, staff and witnesses will be spoken with as soon as possible to gather relevant information quickly to understand the situation and assess whether there was intent to cause harm.
* **Decide on action** – if it is believed that any young person is at risk of significant harm, a referral will be made to children’s social care. The DSL/DDSL will then work with children’s social care to decide on next steps, which may include contacting the police.
* **Inform parents** - as with other concerns of abuse, the college will normally seek to discuss concerns about a student with parents. Our focus is the safety and wellbeing of the student and so if the college believes that notifying parents could increase the risk to the young person or exacerbate the problem, advice will first be sought from children’s social care and/or the police before parents are contacted.
* **Record** – all concerns, discussions and decisions made, and the reasons for those decisions, will be recorded in a secure thread on Cedar. The record will include a clear and comprehensive summary of the concern, details of how the concern was followed up and resolved, and a note of the action taken, decisions reached and the outcome.

Young people can report allegations or concerns of child-on-child abuse to any staff member and that staff member will pass on the allegation to the DSL/DDSL in accordance with this policy. To ensure young people can report their concerns easily, the college has the following system in place for young people to confidently report abuse:

* Our confidential email reporting tool, with the option to remain anonymous, help@gateway.ac.uk
* Speak to a member of the safeguarding team.
* Speak to another trusted adult in college.

Where allegations of sexual violence or sexual harassment are made, the college will act in accordance with the guidance set out in Keeping Children Safe in Education *(2024)*

##  Supporting those involved

Our staff reassure all victims that they are being taken seriously, regardless of how long it has taken them to come forward, and that they will be supported and kept safe. Our staff will never give a victim the impression that they are creating a problem by reporting sexual violence or sexual harassment, nor will victims be made to feel ashamed for making a report.

Abuse that occurs online or outside of college will not be downplayed and will be treated equally seriously. We recognise that sexual violence and sexual harassment occurring online can introduce a number of complex factors. Amongst other things, this can include widespread abuse or harm across a number of social media platforms that leads to repeat victimisation.

The support required for the student who has been harmed will depend on their circumstance and the nature of the abuse. Support could include counselling, mentoring, the support of family and friends and/or support with improving peer relationships or restorative justice work. Support may also be required for the student that harmed. We will seek to understand why the student acted in this way and consider what support may be required to help the student and/or change behaviours. Once those needs have been met, the consequences for the harm caused or intended will be addressed.

# Serious violence

All staff are made aware of indicators that young people are at risk from or are involved with serious violent crime. These include increased absence, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts could also indicate that young people have been approached by or are involved with individuals associated with criminal gangs.

All staff are made aware of the range of risk factors which increase the likelihood of involvement in serious violence, such as being male, having been frequently absent or permanently excluded from college, having experienced child maltreatment and having been involved in offending, such as theft or robbery.

# Child Criminal Exploitation (CCE) and Child Sexual Exploitation (CSE)

Both CCE and CSE are forms of abuse that occur where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a young person into taking part in sexual or criminal activity in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. This power imbalance can be due to a range of factors, including age, gender sexual identity, cognitive ability, physical strength, status, and access to economic or other resources.

The college includes the risks of criminal exploitation and sexual exploitation in tutorial sessions, assemblies, personal safety event, as well as opportunities across the curriculum. A common feature of such exploitation is that the young person often doesn’t recognise the coercive nature of the relationship and doesn’t see themselves as a victim. The young person may initially resent what they perceive as interference by staff, but staff must act on their concerns, as they would for any other type of abuse.

## Child Sexual Exploitation (CSE)

CSE is a form of child sexual abuse which may involve physical contact, including assault by penetration (for example, rape or oral sex) or nonpenetrative acts such as masturbation, kissing, rubbing, and touching outside clothing. It may include non-contact activities, such as involving young people in the production of sexual images, forcing young people to look at sexual images or watch sexual activities, encouraging young people to behave in sexually inappropriate ways or grooming a young person in preparation for abuse.

CSE can occur over time or be a one-off occurrence and may happen without the young person’s immediate knowledge e.g. through others sharing videos or images of them on social media.

CSE can affect any young person, who has been coerced into engaging in sexual activities. This includes 16- and 17-year-olds who can legally consent to have sex. Some young people may not realise they are being exploited e.g. they believe they are in a genuine romantic relationship.

Children and young people are often unwittingly drawn into sexual exploitation through the offer of friendship and care, gifts, drugs, and alcohol, and sometimes accommodation. Sexual exploitation is a serious crime and can have a long-lasting adverse impact on a young person’s physical and emotional health. It may also be linked to child trafficking.

All staff are made aware of the indicators of sexual exploitation which, as well as including the indicators set out under CCE below, can also include having older boyfriends and suffering sexually transmitted infections or becoming pregnant. All concerns are reported immediately to the DSL/DDSL.

## Child Criminal Exploitation (CCE)

CCE can include young people being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting, or pickpocketing, being forced, or manipulated into committing vehicle crime or threatening/committing serious violence to others.

Young people can become trapped by this exploitation as perpetrators can threaten victims (and their families) with violence or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or carry a knife for a sense of protection.

Young people involved in criminal exploitation often commit crimes themselves. They may still have been criminally exploited even if the activity appears to be something they have agreed or consented to.

It is important to note that the experience of girls who are criminally exploited can be very different to that of boys and both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

All staff are made aware of indicators that young people are at risk from or experiencing criminal exploitation. The main indicator can include young people who:

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

## County lines

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs around the country using dedicated mobile phone lines. Children, young people, and vulnerable adults are exploited to move, store, and sell drugs and money, with offenders often using coercion, intimidation, violence, and weapons to ensure compliance of victims.

County lines exploitation can occur where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a young person. This power imbalance can be due to the same range of factors set out under CCE, above.

Young people can be targeted and recruited into county lines in a number of locations, including colleges. Indicators of county lines include those indicators set out under CCE, above, with the main indicator being missing episodes from home and/or college. Additional specific indicators that may be present where a young person is criminally exploited include young people who:

* go missing and are subsequently found in areas away from home.
* have been the victim or perpetrator of serious violence (e.g. knife crime)
* are involved in receiving requests for drugs via a phone line, moving drugs, handing over and collecting money for drugs.
* are exposed to techniques such as ‘plugging’, where drugs are concealed internally to avoid detection.
* are found in accommodation with which they have no connection or in a hotel room where there is drug activity.
* owe a ‘debt bond’ to their exploiters.
* have their bank accounts used to facilitate drug dealing.

# Online safety

As colleges increasingly work online, it is essential that young people are safeguarded from potentially harmful and inappropriate material. The use of technology has become a significant component of many safeguarding issues, such as child sexual exploitation, radicalisation, and sexual predation.

The DSL takes lead responsibility for safeguarding and online safety, which includes overseeing and acting on:

* filtering and monitoring reports
* safeguarding concerns
* checks to filtering and monitoring systems

Our filtering and monitoring provider is Lightspeed, they provide appropriate and effective filters and monitoring systems. Filtering and monitoring are in place to block harmful and inappropriate content by managing the content available to students, who can contact our students and the personal conduct of our students online. We take care to ensure that these systems do not unreasonably impact on teaching and learning, and staff have been identified and assigned suitable roles and responsibilities to manage these systems. We also have effective monitoring strategies in place to meet the safeguarding needs of our students. Our filtering and monitoring systems are tested at regular intervals and reviewed annually to ensure their effectiveness.

We tell parents and carers what filtering and monitoring systems we use, so they can understand how we work to keep our young people safe.

We have also ensured that appropriate level of security protection procedures is in place to safeguard our systems, staff and learners. We review the effectiveness of these procedures periodically to keep up with evolving cyber-crime technologies.

Online safety risks can be categorised into four areas of risk:

* **content -** being exposed to illegal, inappropriate, or harmful content such as pornography, fake news, misogyny, self-harm, suicide, radicalisation, and extremism.
* **contact -** being subjected to harmful online interaction with other users such as peer to peer pressure and adults posing as young people or young adults to groom or exploit young people.
* **conduct -** personal online behaviour that increases the likelihood of, or causes, harm such as making, sending, and receiving explicit images, sharing other explicit images and online bullying.
* **commerce** - risks such as online gambling, inappropriate advertising, phishing, or financial scams.

All staff are aware of these risk areas and should report any concerns to the DSL/DDSL.

# Sharing nudes and semi nudes

Sharing photos, videos and live streams online is part of daily life for many children and young people, enabling them to share their experiences, connect with friends and record their lives. Sharing nudes and semi-nudes means the sending or posting online of nude or semi-nude images, videos, or live streams by young people under the age of 18. This could be via social media, gaming platforms, chat apps or forums, or done offline between devices via services like Apple’s AirDrop.

The term ‘nudes’ is used as it is most commonly recognised by young people and more appropriately covers all types of image sharing incidents. Alternative terms used by children and young people may include ‘dick pics’ or ‘pics’. Other terms used in education include ‘sexting’, youth produced sexual imagery’ and ‘youth involved sexual imagery’.

The motivations for taking and sharing nudes and semi-nudes are not always sexually or criminally motivated. Such images may be created and shared consensually by young people who are in relationships, as well as between those who are not in a relationship. It is also possible for a young person in a consensual relationship to be coerced into sharing an image with their partner. Incidents may also occur where:

* young people find nudes and semi-nudes online and share them claiming to be from a peer.
* young people digitally manipulate an image of a young person into an existing nude online.
* images created or shared are used to abuse peers e.g. by selling images online or obtaining images to share more widely without consent to publicly shame.

All incidents involving youth produced sexual imagery will be responded to as follows:

* The incident will be referred to the DSL/DDSL immediately and the DSL/DDSL will hold an initial review meeting with appropriate staff. If appropriate, there will be subsequent interviews with the young people involved.
* Parents will be informed at an early stage and involved in the process unless there is good reason to believe that involving parents would put the young person at risk of harm.
* At any point in the process, if there is a concern a young person has been harmed or is at risk of harm a referral will be made to children’s social care and/or the police immediately in accordance with this policy.

In some instances, it may be necessary to refer the matter to the police. Once a report is made to the police, the report must be recorded, and the police will investigate. This may include seizure of devices and interviews with the young people involved.

The UK Council for Internet Safety updated its advice for managing incidences of sharing nudes and semi-nudes in December 2020 – [UKCIS advice 2020](https://www.gov.uk/government/publications/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people). The college will have regard to this advice when managing these issues.

1. **Domestic abuse**

The Domestic Abuse Act 2021 introduces a legal definition of domestic abuse and recognises the impact of domestic abuse on young people if they see, hear, or experience the effects of abuse.

Domestic 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. It includes people who have been or are married, are or have been civil partners, have agreed to marry one another or each have or have had a parental relationship in relation to the same young person. It can include psychological, physical, sexual, financial, economic, and emotional abuse.

Anyone can be a victim of domestic abuse, regardless of sexual identity, age, ethnicity, socioeconomic status, sexuality or background and domestic abuse can take place inside or outside of the home. This means young people can also be victims of domestic abuse.

Any child can witness and be adversely affected by domestic abuse in their home life. Experiencing domestic abuse can have a serious emotional and psychological impact on young people, and in some cases, a young person may blame themselves for the abuse or may have had to leave the family home as a result.

Where police have been called to a domestic violence incident where young people are in the household and experienced that incident, the police will inform the DSL. This ensures that the college has up to date safeguarding information about the young person.

All staff are aware of the impact domestic violence can have on a young person. If any of our staff are concerned that a young person has witnessed domestic abuse, they will report their concerns immediately to the DSL/DDSL.

# Honour-based abuse

‘Honour-based’ abuse (HBA) encompasses 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. All forms of HBV are abuse.

Abuse committed in the context of preserving ‘honour’ often involves a wider network of family or community pressure and can include multiple perpetrators. Staff and the DSL/DDSL are aware of this dynamic and will consider it when deciding what safeguarding action to take.

FGM is the collective name given to a range of procedures involving the partial or total removal of external female genitalia for non-medical reasons. In England, Wales and Northern Ireland, the practice is a criminal offence under the Female Genital Mutilation Act 2003. The practice can cause intense pain and distress and long-term health consequences, including difficulties in childbirth.

FGM is carried out on girls of any age, from young babies to older teenagers and adult women, so college staff are trained to be aware of risk indicators. Many such procedures are carried out abroad and staff should be particularly alert to suspicions or concerns expressed by female students about going on a long holiday during the summer vacation period.

A forced marriage is a marriage in which a female (and sometimes a male) does not consent to the marriage but is 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 illegal. It is also illegal to carry out any conduct whose purpose is to cause a young person to marry before their eighteenth birthday, even if violence, threats, or another form of coercion are not used. As with the existing forced marriage law, this applies to non-binding, unofficial ‘marriages’ as well as legal marriages.

Young people may be married at a very young age, and well below the age of consent in England. College staff receive training and should be particularly alert to suspicions or concerns raised by a student about being taken abroad and not be allowed to return to England.

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

# Radicalisation and extremism

The government defines extremism 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. Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.

Some young people are at risk of being radicalised: adopting beliefs and engaging in activities which are harmful, criminal, or dangerous. Islamic extremism is the most widely publicised form and colleges should also remain alert to the risk of radicalisation into white supremacy extremism.

College staff receive training to help to identify signs of extremism. Opportunities are provided in the curriculum to enable students to discuss issues of religion, ethnicity and culture and the college follows the DfE advice Promoting fundamental British Values as part of SMCS (spiritual, moral, social, and cultural education) in schools (2014).

[Guidance for schools and colleges British Values](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/380595/SMSC_Guidance_Maintained_Schools.pdf)

# Private fostering arrangements

A private fostering arrangement occurs when someone other than a parent or a close relative cares for a young person for a period of 28 days or more, with the agreement of the young person’s parents. It applies to young people under the age of 16 or aged under 18 if the young person is disabled. By law, a parent, private foster carer, or other persons involved in making a private fostering arrangement must notify children’s services as soon as possible.

Where a member of staff becomes aware that a student may be in a private fostering arrangement, they will raise this with the DSL/Deputy Principal and the college should notify the local authority of the circumstances.

# Related safeguarding portfolio policies

This policy should be read alongside our other safeguarding policies, which are set out in Appendix Two.

1. **Special Circumstances**

## Looked after children

The most common reason for young people becoming looked after is because of abuse, neglect, or exploitation. The college ensures that staff have the necessary skills and understanding to keep looked after children safe. Appropriate staff have information about a young person’s looked after legal status and care arrangements, including the level of authority delegated to the carer by the authority looking after the young person. The designated person (DDSL) for looked after children and the DSL have details of the young person’s social worker and the name and contact details of the local authority’s virtual head for young people in care.

## Young people who have a social worker

Young people may need a social worker due to safeguarding or welfare needs. Local authorities will share this information with us, and the DSL/DDSL will hold and use this information to inform decisions about safeguarding and promoting the young person’s welfare.

## Work experience/Industry Placements/Project Search

The college has detailed procedures to safeguard students undertaking work experience, industry placements and Project Search. A DDSL works with employers and students to assess risks, including arrangements for checking people who provide placements who supervise students on work experience, which are in accordance with the guidance in *Keeping Children Safe in Education (2024)*. These procedures are kept with the Employability Careers team. The follow procedures take place;

* Termly safeguarding disclosure forms will be collated and analysed from all employers to continuously evolve good practice.
* Travel safety plans are in place for vulnerable students and those who travel out of the city on complex journeys.
* DBS checks for employees working one on one with students to be carried out in advance.
* Additional assemblies and resources given to high-risk placements.
* High risk employers will receive safeguarding face to face briefing and additional resources pack.
* Additional training for job coaches and instructors to manage disclosures offsite.
* Emergency safety plan for SEND students stranded on placement.

## Young people staying with host families

The college may arrange for students to stay with a host family during a foreign exchange trip. Some overseas students may reside with host families during college terms, and we will work with the local authority, schools and colleges involved and risk assess using our own safeguarding data, to check that such arrangements are safe and suitable.

It is not possible for colleges to obtain criminal record information from the DBS about adults abroad. Where students stay with families abroad, we will agree with partner colleges a shared understanding of the arrangements in place. Staff will use their professional judgement to satisfy themselves that the arrangements are appropriate to safeguard the students, which will include ensuring students understand who to contact should an emergency occur, or a situation arise which makes them feel uncomfortable. We will also make parents aware of these arrangements.

The college follows the guidance in Annex D of *Keeping Children Safe in Education (2024)* to ensure that hosting arrangements are as safe as possible.

## Young people’s homes

Research has shown that young people can be particularly vulnerable in residential settings. All residential homes comply with the National Minimum Standards for their setting and are appropriately inspected. However, if you have concerns regarding signs of abuse in such settings, you should report your concerns to DSL/DDSL

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# Appendix One

## Four categories of abuse

Physical abuse
Physical abuse is 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 (this used to be called Munchausen’s Syndrome by Proxy but is now more usually referred to as fabricated or induced illness).

Emotional abuse
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 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 young people. 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 young people frequently to feel frightened or in danger, or the exploitation or corruption of young people. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Sexual abuse
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 young people in looking at, or in the production of, sexual images, watching sexual activities, encouraging young people to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other young people.

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 caregivers); or
* 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

Physical signs define some types of abuse, for example, bruising, bleeding, or broken bones resulting from physical or sexual abuse, or injuries sustained while a child has been inadequately supervised. The identification of physical signs is complicated, as young people may go to great lengths to hide injuries, often because they are ashamed or embarrassed, or their abuser has threatened further violence or trauma if they ‘tell’. It is also quite difficult for anyone without medical training to categorise injuries into accidental or deliberate with any degree of certainty. For these reasons, it is vital that staff are also aware of the range of behavioural indicators of abuse and report any concerns to the designated safeguarding lead.

**It is the responsibility of staff to report their concerns. It is not their responsibility to investigate or decide whether a young person has been abused.**

A young person who is being abused, neglected, or exploited may:

* have bruises, bleeding, burns, fractures, or other injuries.
* show signs of pain or discomfort
* keep arms and legs covered, even in warm weather.
* be concerned about changing for PE or swimming.
* look unkempt and uncared for
* change their eating habits.
* have difficulty in making or sustaining friendships.
* appear fearful.
* be reckless with their own or other’s safety.
* self-harm
* frequently miss college, arrive late, or leave the college for part of the day.
* show signs of not wanting to go home.
* display a change in behaviour – from quiet to aggressive, or happy-go-lucky to withdrawn.
* challenge authority.
* become disinterested in their college work.
* be constantly tired or preoccupied.
* be wary of physical contact.
* be involved in, or particularly knowledgeable about drugs or alcohol.
* display sexual knowledge or behaviour beyond that normally expected for their age.
* acquire gifts such as money or a mobile phone from new ‘friends.

Individual indicators will rarely, in isolation, provide conclusive evidence of abuse. They should be viewed as part of a jigsaw, and each small piece of information will help the DSP to decide how to proceed.

**Reporting Harmful Sexual Behaviours – Sexual Violence and Sexual Harassment – Gateway College**



**Filtering and Monitoring**

Filtering refers to the technology preventing access to harmful or inappropriate content, whilst monitoring refers to the practical steps staff take to ensure harmful or inappropriate access is not made. Monitoring can include [specify those that are in use]:

* Physical monitoring
* Live software monitoring
* Monitoring user logs
* Monitoring individual devices

We make sure that any college devices used away from the college site are also subject to filtering and monitoring procedures.

Each year (at least) our designated safeguarding lead, along with our IT team and a governor, review our filtering and monitoring procedures to ensure that they effectively prevent access to harmful or inappropriate content. They also ensure that the systems we have in place to report any difficulties with the system are understood by all staff and reports are effectively managed.

All our staff undertake training to understand the risks of poor filtering and monitoring, and know how to share their concerns with the DSL/DDSL.

**Safeguarding Duty Officer Rota**

The DP/AP DSL will be main point of contact for holiday periods, and a DSL will be assigned as point of contact for any external activities and residential trips.

**Appendices Two**

**Staff Allegations**

The Deputy Principal and HR Manager will take the initial lead on all staff based Safeguarding concerns, issues, and allegations. This could be passed to the DSL who will assess, determine and delegate whom the correct person will be to move forward with the initial concern, issue or allegation based on the application of the appropriate policy, i.e., staff disciplinary policy, behaviour for learning policy etc.

**Low Level Concerns**

Low level concerns Information has been updated in KCSIE23. The definition contains a clear procedure for confidentially sharing concerns. Any concerns identified should be initially shared with the Deputy Principal, Deputy Designated Safeguarding Lead for Staff (DDSL) or directly with the Principal. The Principal should ultimately be informed of all low-level concerns and make the final decision on how to respond. Where appropriate this can be done in consultation with the Assistant Principal Students and Progression, Designated Safeguarding Lead (DSL).

Guidance also clarifies that low level concerns which occur on college premises or are shared about supply staff, contractors or external organisations should be notified to their employers; and schools and colleges should consult with their LADO, if unsure whether low-level concerns shared about a member of staff meet the harm threshold.

In addition, guidance states that low-level concerns should not be included in references. This includes any repeated concerns or allegations which have been found to be false, unfounded unsubstantiated or malicious should not be included in a reference.

**Allegations without foundation**

False allegations against college staff may be indicative of problems of abuse elsewhere. However, all allegations of abuse by staff should be taken seriously and discussed straightaway with the Deputy Principal (DDSL), who will normally consult the Local Authority Designated Officer (LADO) at the Safeguarding Unit. If it is agreed that the allegation is demonstrably false, a record should nonetheless be kept, and consideration given to a referral to Children & Young People’s Service or the Leicester Safeguarding Children Board.

**The Deputy Principal and HR Manager will:**

* Inform the member of staff against whom the allegation was made, orally and in writing, that no further disciplinary or safeguarding action will be taken. Consideration should be given to offering counselling/support.
* Inform the parents/carers of the alleged victim, as appropriate, of the outcomes of the investigation.
* Where the allegation was made by a student, other than the alleged victim, consideration should be given to informing the parents/carers of that student.
* Prepare a summary report for the Safeguarding Records, outlining the:
* allegation
* investigative process
* conclusions, with reasons
* action taken, if appropriate
* reflection on lessons learnt

**Allegations against a member of staff**

* Staff may have safeguarding allegations made against them. The College recognises that such an allegation may be made for a variety of reasons, the facts of which may or may not be true. It is imperative that those dealing with an allegation maintain an open mind and ensure that investigations are thorough and not subject to delay.
* The College recognises its statutory duty to safeguard and promote the welfare of its students which is of paramount importance. It also acknowledges that hasty or ill-informed decisions in connection with a member of staff can irreparably damage the individual’s reputation, confidence and career. Therefore, those dealing with such allegations within the College will do so with the greatest sensitivity and will act in a careful, measured and discreet manner.
* A member of staff who receives an allegation about another member of staff should follow the procedure in ‘Dealing with disclosures of abuse’.
* The allegation should be reported immediately to the Deputy Principal/ HR Manager, unless the Deputy Principal is the person against whom the allegation is made, in which case the report should be made to the Principal or Designated Governor. If the Deputy Principal is not available, then it should be reported to a member of the SLT, who will follow the procedure as outlined below. The appropriate lead will:
* Obtain written details of the allegation from the person who received it, that are signed and dated. The written details should be countersigned and dated by the Deputy Principal on receipt and stored securely in the Human Resource office.
* Record information about times, dates, locations and names of potential witnesses.
* Always seek advice straightaway from the Local Authority Designated Officer.

### Record keeping

### It is important that documents relating to any allegation or investigation are kept in a secure place, together with a written record of the outcome. It is essential that the college SLT, and Safeguarding team are clear what information child protection records should contain. Records should include:

### Details of how the concern was followed up and resolved.

### A note of any action taken, decisions reached and the outcome.

### A clear and comprehensive summary of the concern.

* All concerns discussions and decisions made and the reasons for those decisions should be recorded in writing.
* If disciplinary action is taken against a student or member of staff. The details should be retained on the individual’s confidential file.
* If a member of staff is dismissed or resigns before the disciplinary process is completed, they should be informed about the College’s statutory duty to inform the Secretary of State for Education.

This will also help if/when responding to any complaints about the way a case has been handled by the college.

**Initial assessment**

* The DP, or member of SLT, should make an initial assessment of the allegation, consulting with other members of the SLT as appropriate and external agencies e.g. the Leicester Safeguarding Children Board, as appropriate. Where the allegation is considered to be either a potential criminal act or indicates that the student has suffered, is suffering or is likely to suffer significant harm, the matter should be reported **immediately** to the Local Authority Designated Officer at the Children & Young People’s Service.
* It is important that the DP and SLT, does not investigate the allegation. The initial assessment should be based on the information received and a decision should be made as to whether or not the allegation warrants further investigation.
* If the initial assessment reveals that there has been inappropriate behaviour or poor practice by the member of staff that is neither a crime, nor likely to cause significant harm to the student, the matter should be addressed in accordance with the College disciplinary procedure.

**External enquiries**

Occasionally enquiries are made by external agencies about students or staff. These should be referred to a member of the Safeguarding Team for students and to DP for staff. The correct documentation should be received prior to revealing any information to ensure adherence to data protection protocols. However, where the request or enquiry relates to a matter of child protection, relevant information should be provided by college managers without delay.

* Safeguarding enquiries by Children & Young People’s Service or the police are not to be confused with internal, disciplinary enquiries by the College. The College may be able to use the outcome of external agency enquiries as part of its own procedures. The safeguarding agencies, including the police, have no power to direct the College to act in a particular manner, however, the College should assist the agencies with their enquiries.
* The College will hold its internal enquiries in abeyance while the formal police or Children & Young People’s Service investigations proceed; to do otherwise may prejudice the investigation. Any internal enquiries will follow the College’s disciplinary procedures.

**The investigation**

The investigation should be conducted in accordance with the existing staff disciplinary procedures. It will be informed by the outcome of any enquiries made by the police or Children’s Social Care.

* The member of staff should be informed of the allegation against them and their entitlement to be accompanied by a trade union representative, colleague or friend.
* Where the member of staff has been suspended and no disciplinary action is to be taken, the suspension should be lifted immediately, and arrangements made for the member of staff to return to work. It may be appropriate to offer counselling.
* The student making the allegation and/or their parents/carers should be informed, as appropriate, of the outcome of the investigation and proceedings. This should occur prior to the return to College of the member of staff, if suspended. A student aged under 18 years should be accompanied by a responsible adult.
* The DP should consider what information should be made available to the College, if any.
* Subject to objections from the police or other investigating agencies, the DP will:
* Inform the student alleging that the investigation is taking place and what the likely process will involve.
* Ensure that the parents/carers of the student, if aged under 18, making the allegation have been informed that it has been made and what the likely process will involve. If the student is aged 18 and over, we are not obliged to inform parents, but this is on a case by case basis.
* Inform the member of staff against whom the allegation was made that the investigation is taking place and what the likely process will involve.
* Inform the Designated Governor of the allegation and the investigation.
* Keep a written record of the action taken in connection with the allegation.

**Suspension of staff**

Throughout any proceedings, staff should be advised to seek independent advice via, for example, a trade union.

* + Suspension should not be automatic. In respect of staff, other than the Principal, suspension can only be carried out by the Principal, or a delegated authority. In respect of the Principal, suspension can only be carried out by the Chair of Governors or in their absence, the Vice Chair. If the DSL is other than the Principal, it is essential that pending suspension the DSL notifies the Principal of intention.
	+ Suspension may be considered at any stage of the investigation. It is a neutral, not a disciplinary act, and will be on full pay. Consideration should be given to alternatives e.g. change of, or withdrawal from, specified duties.
	+ Suspension should only occur for a good reason, for example where:
* A young person is at risk.
* The allegations are potentially sufficiently serious to justify dismissal on the grounds of gross misconduct.
* It is necessary for the good and efficient conduct of the investigation.

Depending on the nature of the allegation, prior to making the decision to suspend, the Principal or Chair of Governors, or their delegated authorities, should meet the member of staff. If there is a need for an external investigation, for example, by the police or Local Authority Designated Officer, there should be prior consultation with the agency.

It should be made clear that the meeting is not a formal disciplinary hearing, but solely for raising a serious matter that has led to suspension pending the outcome of an investigation. The likely process of the investigation should be outlined with an approximate timescale.

If the Principal or Chair of Governors considers that suspension is necessary, the member of staff shall be informed that he/she is suspended from duty. Written confirmation of the suspension, with reasons, based on the allegation, should be despatched as soon as possible, ideally within one working day.

Where a member of staff is suspended, the Principal or Chair of Governors should address the following issues:

* The Chair of Governors and Designated Governor should be informed of the suspension in writing, which includes electronic communication.
* Where the Principal has been suspended, the Chair of Governors will need to take action to address the leadership of the College.
* As appropriate, the parents/carers of the student making the allegation should be informed of the suspension. They should be asked to treat the information as confidential. Consideration should be given to informing the student making the allegation of the suspension.
* Senior staff who need to know of the reason for the suspension should be informed.
* Depending on the nature of the allegation, the Principal should consider, with the Designated Governor, whether a statement should be made to staff, students and/or parents/carers, taking due regard of the need to avoid unwelcome publicity.
* The Principal will consider carefully and review the decisions as to who is informed of the suspension and investigation including external investigating and regulatory authorities such as the Leicester Safeguarding Children Board, police, Children & Young People’s Service, Local Authority Designated Officer and the Department for Education.
* The suspended member of staff should be given appropriate support during the period of suspension. They should also be provided with information on progress and developments in the case at regular intervals.
* If a member of staff has been dismissed or removed due to safeguarding concerns, or would have been, had they not resigned, a referral should be made to the Disclosure and Barring Service. It is advisable that the LADO should be contacted in advance of this to seek professional, objective advice.

**Monitoring effectiveness**

* Where an allegation has been made against a member of staff, the Principal, Designated Governor and other members of staff involved in the investigation, should, at the conclusion of the investigation and any disciplinary procedures, consider whether there are any matters arising from it that could lead to the improvement of College procedures.
* An anonymised annual report will be available for presentation to the LGB at its first meeting in the subsequent year.
* The Safeguarding Policy will be reviewed and updated annually by the Assistant Principal for Students and Progression (DSL) and approved by the Governing Body.
* A yearly Safeguarding audit will be implemented to assess all internal record keeping.

**Local Governing Board Responsibilities**

Governors play a crucial role in safeguarding by maintaining and reviewing policies, ensuring compliance, monitoring effectiveness, and collaborating with external agencies to protect the welfare of students.

1. **Accountability and Responsibility**: The Better Futures Multi Academy Trust (BFMAT) holds overall accountability and responsibility for safeguarding across its academies. This responsibility is delegated to Local Governing Boards (LGB), which are tasked with ensuring compliance at a local level.
2. **Policy Maintenance and Review**: Each college within the trust is required to maintain and review its individual safeguarding policy. These policies must be reviewed annually and align with the overarching trust safeguarding policy while addressing the specific needs and context of each academy.
3. **Statutory and Ethical Duty**: The governors have a statutory and ethical duty to ensure that the college operates with a view to safeguarding and promoting the welfare of young people and vulnerable adults receiving education and training at the college.
4. **Ensuring Compliance**: The governors are responsible for ensuring that all staff are aware of and comply with the safeguarding policy. This includes providing training and support to staff to help them understand their safeguarding responsibilities.
5. **Monitoring and Evaluation**: The governors must regularly monitor and evaluate the effectiveness of the safeguarding policy and procedures. This involves reviewing safeguarding incidents, identifying areas for improvement, and ensuring that appropriate actions are taken to address any issues.  Safeguarding will be audited during the deep dive cycle to further develop good practice.
6. **Collaboration with External Agencies**: The governors are also responsible for ensuring that the college collaborates with external agencies, such as social services and the police, to safeguard and promote the welfare of young people and vulnerable adults.

**Useful Links**

**Leicester City Council LADO based within the Safeguarding Unit**: 0116 454 2440

**Leicestershire County Council LADO**: 0116 305 7597 & 0116 305 4532

**LADO email for Referrals and New Enquiries:** **CFS-LADO@leics.gov.uk**

[Gateway College Behaviour for Learning Policy](https://view.officeapps.live.com/op/view.aspx?src=https%3A%2F%2Fgateway.ac.uk%2Fwp-content%2Fuploads%2F2023%2F04%2FBehaviour-for-Learning-Policy-2023.docx&wdOrigin=BROWSELINK)

NSPCC: Keeping Children Safe in Education: CASPAR weekly Briefing

[ Filtering\_and\_Monitoring\_Gateway\_College Strategic Plan\_Sept\_2024.xlsx](https://gatewaycollege-my.sharepoint.com/%3Ax%3A/g/personal/skeen_gateway_ac_uk/EStSg-2Si2tPnNmmEYqBc_0BZoxunkV1IMLxbw_que5a1Q)