Safeguarding Policy

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	• Visitors to College Procedure • Whistleblowing Policy • Prevent Policy • Code of Conduct for IT facilities policy • Privacy notices • General Data Protection Policy • Complaints Policy • Online safety Policy

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Safeguarding Policy

Policy Statement and Purpose

Newbury College (NC) and the University Centre Newbury (UCN) (hereinafter together referred to as the College) takes the welfare of young people, and vulnerable adults seriously. The Safeguarding Policy provides clear guidance to staff and others on expected behaviour when dealing with safeguarding of vulnerable adults and young people.

The College recognises that for all students, high self-esteem, confidence, supportive friends and clear lines of communication with a trusted adult help to prevent abuse and extremism; therefore, everyone who comes into contact with young people and vulnerable adults and their families and carers has a role to play in safeguarding.

Our staff are particularly important as they can identify concerns early and provide help for those at risk. College staff form part of the wider safeguarding system and help promote our safeguarding culture. Our safeguarding approach is person-centred and considers what is in the best interests of the student. We are committed to our duty of care towards our diverse population of staff, students, and visitors. This duty includes ensuring that appropriate policies, procedures, guidance, risk assessments, action planning, and training are in place to safeguard young people, and vulnerable adults at risk.

This policy applies in its entirety to all individuals at the College (on and off-site provision), which includes students, staff, governors, volunteers, contractors, subcontractors, and visitors.

Purpose

The College aims to ensure that:

- Appropriate action is taken in a timely manner to safeguard our vulnerable and at-risk students as well as to promote student welfare
- All staff are aware of their statutory responsibilities with respect to safeguarding
- Staff are properly trained in recognising and reporting safeguarding concerns
- We have a safe learning environment
- We practice safer recruitment through recruiting safe adults to work with our students

The College commits to providing a learning environment where everyone can learn, develop and progress effectively. This includes taking action to ensure all our students feel safe and secure, know how to request and receive effective help if they are in danger, and learn how to keep themselves safe (including online). We are committed to a whole-College approach to safeguarding, building on our safeguarding culture with safeguarding at the forefront of our work.

The College takes appropriate action to ensure all members of the College community stay safe during their time with us, including during offsite College related activities, apprenticeships, industry placements and work experience. Additionally, the College aims to equip students to keep themselves safe outside of College and at home to ensure they have the best possible life and educational outcomes.

This policy covers safeguarding for both adults and young people. The first part of the policy relates to our students under the age of 18 and part two refers to all our students 19 and over.

This extends to our ongoing support for vulnerable students up to the age of 25 (EHCP and Care leavers). The legal framework and guidance are different for young people and adults at risk therefore this is described within these sections.

Part 1: Safeguarding and protecting young people under 18

1. Aims

The College is committed to providing a safe, inclusive environment where all students can learn, operate, and interact with respect and dignity. Where everyone's wishes and feelings are valued, and their well-being is the highest priority. The College aims to develop confident, healthy, safe, and emotionally resilient students and staff through the provision of this positive environment.

We will always act in the best interest of the students when responding to welfare concerns and will maintain an attitude of "*it could happen here*" where safeguarding is concerned.

2. Legislation and statutory guidance

This policy is based on the Department for Education's (DfE's) statutory guidance Keeping Children Safe in Education (2024) and Working together to safeguard children, and the FE and sixth-form College corporations: governance guide . We comply with this guidance and the arrangements agreed and published by our three local safeguarding partners (see section 3).

Working together to safeguard children states that 'safeguarding children and young people and protecting them from harm' is everyone's responsibility. Everyone who comes into contact with young people and families has a role to play.

This policy is also based on the following legislation:

Section 175 of the Education Act 2002, which places a duty on Colleges and local authorities to safeguard and promote the welfare of students

The School Staffing (England) Regulations 2009, which set out what must be recorded on the single central record and the requirement for at least 1 person conducting an interview to be trained in safer recruitment techniques.

The Children Act 1989 (and 2004 amendment), which provides a framework for the care and protection of young people

Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the Serious Crime Act 2015, which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18

Statutory guidance on FGM, which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM

The Rehabilitation of Offenders Act 1974, which outlines when people with criminal convictions can work with young people.

Schedule 4 of the Safeguarding Vulnerable Groups Act 2006, which defines what 'regulated activity' is in relation to young people

The Care Act 2014 identifies ten types of adult abuse and neglect that cause harm

Statutory guidance on the Prevent duty, which explains Colleges' duties under the Counterterrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism

The Human Rights Act 1998, which explains that being subjected to harassment, violence and/or abuse, including that of a sexual nature, may breach any or all of the rights which apply to individuals under the European Convention on Human Rights (ECHR)

The Equality Act 2010, which makes it unlawful to discriminate against people regarding particular protected characteristics (age; disability; gender reassignment; marriage and civil partnership; pregnancy and maternity; race; religion or belief; sex; sexual orientation). This means our governors and Principal should carefully consider how they are supporting their students with regard to these characteristics. The Act allows our College to take positive action to deal with particular disadvantages affecting students (where we can show it's proportionate). This includes making reasonable adjustments for disabled students. For example, it could include taking positive action to support girls where there's evidence that they're being disproportionately subjected to sexual violence or harassment

The Public Sector Equality Duty (PSED), which explains that we must have due regard to eliminating unlawful discrimination, harassment and victimisation. The PSED helps us to focus on key issues of concern and how to improve student outcomes. Some students may be more at risk of harm from issues such as sexual violence; homophobic, biphobic or transphobic bullying; or racial discrimination

PACE – the Police and Criminal Evidence Act – Code C 2019 details the role of a person (usually a parent, guardian or social worker) acting as the 'appropriate adult' when a student is questioned or detained by the police.

Health and Safety at Work Act 1974 Health and Safety Work Act is the primary piece of legislation covering occupational health and safety in the workplace.

3. Definitions

Safeguarding and promoting the welfare of young people means:

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

Child protection is part of this definition and refers to activities undertaken to protect specific young people who are suspected to be suffering, or likely to suffer, significant harm. This includes harm that occurs inside or outside the home, including online.

Abuse is a form of maltreatment of a young person and may involve inflicting harm or failing to act to prevent harm. Appendix 1 explains the different types of abuse.

Neglect is a form of abuse and is the persistent failure to meet a young person's basic physical and/or psychological needs, likely to result in the serious impairment of the young person's health or development. Appendix 1 defines neglect in more detail.

Sharing of nudes and semi-nudes (also known as sexting or youth-produced sexual imagery) is where young people share nude or semi-nude images, videos or live streams. This also includes pseudo-images that are computer-generated images that otherwise appear to be a photograph or video.

Children Safeguarding Partnership:

The following three **safeguarding partners** are identified in Keeping Children Safe in Education. They will make arrangements to work together to safeguard and promote the welfare of local young people, including identifying and responding to their needs:

- The local authority (LA)
- Integrated care boards (previously known as clinical commissioning groups) for an area within the LA.
- The chief officer of police for a police area in the LA area

This policy connects with the Pan Berkshire Safeguarding Children's procedures. These procedures can be found here: http://berks.proceduresonline.com

Victim is a widely understood and recognised term, but we understand that not everyone who has been subjected to abuse considers themselves a victim or would want to be described that way. When managing an incident, we will be prepared to use any term that the young person involved feels most comfortable with.

Alleged perpetrator(s) and **perpetrator(s)** are widely used and recognised terms. However, we will think carefully about what terminology we use (especially in front of young people) as, in some cases, abusive behaviour can be harmful to the perpetrator too. We will decide what is appropriate and which terms to use on a case-by-case basis.

4. Equality statement

Some young people and vulnerable adults have an increased risk of abuse, both online and offline, and additional barriers can exist for some students with respect to recognising or disclosing it. We are committed to anti-discriminatory practice and recognise students' diverse circumstances. We ensure that all young people have the same protection, regardless of any barriers they may face.

We give special consideration to young people who:

- Have special educational needs and/or disabilities (SEND) or health conditions (see section 10)
- Are young carers.
- May experiences discrimination due to their race, ethnicity, religion, gender identification or sexuality
- Have English as an additional language (EAL)
- Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence
- Are at risk of female genital mutilation (FGM), sexual exploitation, forced marriage, or radicalisation
- Are asylum seekers
- Are at risk due to either their own or a family member's mental health needs.
- Are looked after or previously looked after (see section 12)
- Are missing or absent from education for prolonged periods and/or repeat occasions.
- Whose parent/carer has expressed an intention to remove them from College to be home educated.

5. Roles and responsibilities

Safeguarding and child protection is **everyone's** responsibility. This policy applies to all staff, volunteers and governors in the College and is consistent with the procedures of the three safeguarding partners. Our policy and procedures also apply to extended College and off-site activities.

The College plays a crucial role in preventative education. This is in the context of a whole-college approach to preparing students for life in modern Britain, and a culture of zero tolerance of sexism, misogyny/misandry, homophobia, biphobia, transphobia and sexual violence/harassment. This will be underpinned by our:

- Positive Behaviour policy
- Pastoral support system
- Planned personal, pastoral development programme (PPD) which includes relationships, sex and health education (RSHE), which is inclusive and delivered regularly, tackling issues such as:
- Healthy and respectful relationships
- Boundaries and consent
- Stereotyping, prejudice and equality
- Body confidence and self-esteem
- How to recognise an abusive relationship (including coercive and controlling behaviour)

- The concepts of, and laws relating to, sexual consent, sexual exploitation, abuse, grooming, coercion, harassment, rape, domestic abuse, so-called honour-based violence such as forced marriage and FGM and how to access support
- What constitutes sexual harassment and sexual violence and why we operate a zero tolerance to this

5.1 All staff

All staff will:

- Read and understand part 1 and annex B of the Department for Education's statutory safeguarding guidance, Keeping Children Safe in Education, and review this guidance at least annually.
- Sign a declaration at the beginning of each academic year to say that they have reviewed the guidance.
- Reinforce the importance of online safety when communicating with parents and carers. This includes making parents and carers aware of what we ask young people to do online (e.g. sites they need to visit or who they'll be interacting with online).
- Provide a safe space for students who are LGBTQ+ to speak out and share their concerns.

All staff will be aware of:

- Our systems that support safeguarding, including this safeguarding policy, the staff code of conduct policy, the role and identity of the designated safeguarding lead (DSL) and DDSL [deputy/deputies], the behaviour policy, online safety that includes the expectations, applicable roles and responsibilities in relation to filtering and monitoring, and the safeguarding response to young people who go missing from education.
- The early help assessment (EHA) process (sometimes known as the common assessment framework) and their role in it, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment.
- The process for making referrals to local authority children's social care and for statutory assessments that may follow a referral, including the role they might be expected to play.
- What to do if they identify a safeguarding issue or a young person tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals.
- The signs of different types of abuse, neglect and exploitation, including domestic and sexual abuse (including controlling and coercive behaviour, as well as parental conflict that is frequent, intense, and unresolved), as well as specific safeguarding issues, such as young person-on-young person abuse, grooming, young person sexual exploitation (CSE), young person criminal exploitation (CCE), indicators of being at risk from or involved with serious violent crime, FGM, radicalisation and serious violence (including that linked to county lines)

- New and emerging threats, including online harm, grooming, sexual exploitation, criminal exploitation, radicalisation, and the role of technology and social media in presenting harm
- The importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe.
- The fact that young people can be at risk of harm inside and outside of their home, at College and online.
- The fact that young people who are (or who are perceived to be) LGBTQ+ can be targeted by other young people.
- That a young person and their family may be experiencing multiple needs at the same time
- What to look for to identify young people who need help or protection

Section 16 and appendix 4 of this policy outline in more detail how staff are supported to do this.

5.2 The designated safeguarding lead (DSL)

The DSL is a member of the senior leadership team. Our DSL is Jatinder Matharu. The DSL takes lead responsibility for safeguarding across the College. This includes online safety and understanding our filtering and monitoring processes on College devices and networks to keep students safe online.

During term time, the DSL will be available during College hours for staff to discuss any safeguarding concerns.

The DSL and DDSL will be available onsite and via phone, teams and phone during core College times. Please see contact details at the start of the policy.

When the DSL is absent, the deputies listed in the contacts will act as cover.

The College operates a rota cover system to ensure there is always a DSL/DDSL available including during out-of-hour/out-of-term activities.

The DSL will be given the time, funding, training, resources and support to:

- Provide advice and support to other staff on young person welfare and young person protection matters.
- Take part in strategy discussions and inter-agency meetings and/or support other staff to do so.
- Contribute to the assessment of young people.
- Attend professional meetings including strategy meetings/reviews, child protection meetings, child in care meetings/reviews, core groups, team around the child meetings. This also includes all meetings with the Virtual school where a young person is in care (CiC). This list is not exhaustive.
- Refer suspected cases, as appropriate, to the relevant body (local authority children's social care, Channel programme, Disclosure and Barring Service, and/or police), and support staff who make such referrals directly

- Have a good understanding of harmful sexual behaviour
- Have a good understanding of the filtering and monitoring systems and processes in place at our College.
- Make sure that staff have appropriate Prevent training and induction.
- Act as a lead contact for the local authority.

The DSL will also:

- Keep the Principal informed of any issues.
- Liaise with local authority case managers and designated officers for young person protection concerns as appropriate.
- Discuss the local response to sexual violence and sexual harassment with police and local authority children's social care colleagues to prepare the College's policies.
- Be confident that they know what local specialist support is available to support all young people involved (including victims and alleged perpetrators) in sexual violence and sexual harassment and be confident as to how to access this support.
- Be aware that young people must have an 'appropriate adult' to support and help them in the case of a police investigation or search.
- Complete the annual Safeguarding section 175 audit for West Berkshire Local Authority.

The full responsibilities of the DSL and DDSL are set out in their job description.

5.3 The governing board

The governing board will:

Facilitate a whole-College approach to safeguarding, ensuring that safeguarding and child protection are at the forefront of, and underpin, all relevant aspects of process and policy development.

Evaluate and approve this policy at each review, ensuring it complies with the law, and hold the principal to account for its implementation

Be aware of its obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty), and our College's local multi-agency safeguarding arrangements.

Appoint a senior board level (or equivalent) safeguarding governor to monitor the effectiveness of this policy in conjunction with the full governing board. This is always a different person from the DSL. The Safeguarding Governor is Mr Chris Wilson who meets with the DSL and Vice Principal – Central Services each term to review and challenge our safeguarding processes as listed below.

Safeguarding is an agenda item at all relevant Governing Body meetings (Curriculum and Quality Committee, and Corporation Board).

Ensure all staff undergo safeguarding and child protection training, including online safety, and that such training is regularly updated and is in line with advice from the safeguarding partners.

Ensure that the College has appropriate filtering and monitoring systems in place and review their effectiveness. The Safeguarding Governor is responsible for the oversight of monitoring and filtering for the College. This includes:

- Making sure that the leadership team and staff are aware of the provisions in place, and that they understand their expectations, roles and responsibilities around filtering and monitoring as part of safeguarding training.
- Reviewing the DfE's filtering and monitoring standards, and discussing with IT staff and service providers what needs to be done to support the College in meeting these standards

Make sure:

- The DSL has the appropriate status and authority to carry out their job, including additional time, funding, training, resources and support.
- Online safety is a running and interrelated theme within the whole-College approach to safeguarding and related policies.
- The DSL has lead authority for safeguarding, including online safety and understanding the filtering and monitoring systems and processes in place.
- The College has procedures to manage any safeguarding concerns (no matter how small) or allegations that do not meet the harm threshold (low-level concerns) about staff members (including agency staff, volunteers and contractors). Appendix 3 of this policy covers this procedure
- That this policy reflects that young people with SEND, or certain medical or physical health conditions, can face additional barriers to any abuse or neglect being recognised

Where another body is providing services or activities (regardless of whether or not the young people who attend these services/activities are young people on the College roll):

- Seek assurance that the other body has appropriate safeguarding and young person protection policies/procedures in place, and inspect them if needed
- Make sure there are arrangements for the body to liaise with the College about safeguarding arrangements, where appropriate
- Make sure that safeguarding requirements are a condition of using the College premises, and that any agreement to use the premises would be terminated if the other body fails to comply

The chair of governors will act as the 'case manager' in the event that an allegation of abuse is made against the Principal, where appropriate (see Managing Allegations against Staff Policy for further details).

The Safeguarding Governor will read Keeping Children Safe in Education in its entirety. All other governors should read Part 2.

Section 23.3 of this policy has information on how governors are supported to fulfil their role.

5.4 The Principal

The Principal is responsible for the implementation of this policy, including:

Ensuring that staff (including temporary staff) and volunteers:

- Are informed of our systems that support safeguarding, including this policy, as part of their induction
- Understand and follow the procedures included in this policy, particularly those concerning referrals of cases of suspected abuse and neglect

Communicating this policy to parents/carers when their young person joins the College and via the College website

Ensuring that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent

Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate (see Managing Allegations policy)

Making decisions regarding all low-level concerns, though they may wish to collaborate with the DSL on this

5.5 Virtual College headteacher

Virtual College heads have a non-statutory responsibility for the strategic oversight of the educational attendance, attainment and progress of students with a social worker.

They should also identify and engage with key professionals, e.g. DSLs, special educational needs co-ordinators (SENCOs), social workers, mental health leads and others.

5.6 Partnership working

The College will work with a range of internal and external partners, both statutory and non-statutory partners to support our students.

6. Confidentiality

Confidentiality is extremely important for those working with young people and vulnerable adults, especially in the context of safeguarding. The main purpose of maintaining confidentiality is to protect the individual students. Staff members should never promise confidentiality to a student or keep any secrets with a student. If there is a safeguarding concern, it must be reported to the Designated Safeguarding Lead / Safeguarding team and may require further investigation by the appropriate authorities. Students can be assured that only those who need to know will be informed, and that the information will be shared on a need-to-know basis while also ensuring that it remains private.

Keeping detailed records is crucial for effective safeguarding. The College has a clear policy regarding the recording of any concerns about a student, the status of these records, and when they should be shared with other relevant agencies. All safeguarding records are maintained on MyConcern.

- Timely information sharing is essential to effective safeguarding
- Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety, of young people

- The Data Protection Act (DPA) 2018 and the UK GDPR do not prevent, or limit, the sharing of information for the purposes of keeping young people safe
- If staff need to share 'special category personal data', the DPA 2018 contains 'safeguarding of young people and individuals at risk' as a processing condition that allows practitioners to share information without consent if: it is not possible to gain consent; it cannot be reasonably expected that a practitioner gains consent; or if to gain consent would place a young person at risk
- Staff should never promise a young person that they will not tell anyone about a report of abuse, as this may not be in the young person's best interests
- If a victim asks the College not to tell anyone about the sexual violence or sexual harassment:
- There's no definitive answer, because even if a victim doesn't consent to sharing information, staff may still lawfully share it if there's another legal basis under the UK GDPR that applies
- The DSL will have to balance the victim's wishes against their duty to protect the victim and other young people
- The DSL should consider that:
    - Parents or carers should normally be informed (unless this would put the victim at greater risk)
    - The basic safeguarding principle is: if a young person is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to local authority children's social care
    - Rape, assault by penetration and sexual assault are crimes. Where a report of rape, assault by penetration or sexual assault is made, this should be referred to the police. While the age of criminal responsibility is 10, if the alleged perpetrator is under 10, the starting principle of referring to the police remains

Regarding anonymity, all staff will:

- Be aware of anonymity, witness support and the criminal process in general where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system
- Do all they reasonably can to protect the anonymity of any young people involved in any report of sexual violence or sexual harassment – for example, carefully considering which staff should know about the report, and any support for young people involved
- Consider the potential impact of social media in facilitating the spreading of rumours and exposing victims' identities

The government's information sharing advice for safeguarding practitioners includes seven 'golden rules' for sharing information, and will support staff who have to make decisions about sharing information. See appendix 5 for the flowchart to help make decisions about sharing information

If staff are in any doubt about sharing information, they should speak to the DSL (or deputy)

Confidentiality is also addressed in this policy with respect to record-keeping in section 22, and allegations of abuse against staff in section 7.7.2.

7. Recognising abuse and taking action

All staff are expected to be able to identify and recognise all forms of abuse, neglect and exploitation and shall be alert to the potential need for early help for a young person who:

- Is disabled
- Has special educational needs (whether or not they have a statutory education health and care (EHC) plan)
- Is a young carer
- Is bereaved
- Is showing signs of being drawn into anti-social or criminal behaviour, including being affected by gangs and county lines and organised crime groups and/or serious violence, including knife crime
- Is frequently missing/goes missing from education, care or home
- Is at risk of modern slavery, trafficking, sexual and/or criminal exploitation
- Is at risk of being radicalised or exploited
- Is viewing problematic and/or inappropriate online content (for example, linked to violence), or developing inappropriate relationships online
- Is in a family circumstance presenting challenges for the young person, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- Is misusing drugs or alcohol
- Is suffering from mental ill health
- Has returned home to their family from care
- Is at risk of so-called 'honour'-based abuse such as female genital mutilation (FGM) or forced marriage
- Is a privately fostered young person
- Has a parent or carer in custody or is affected by parental offending
- Is missing education, or persistently absent from College, or not in receipt of full-time education
- has experienced suspensions and /or at risk or has been permanently withdrawn
- Staff, volunteers and governors must follow the procedures set out below in the event of a safeguarding issue.

Please note – in this and subsequent sections, you should take any references to the DSL to mean "the DSL (or deputy DSL)".

7.1 If a young person is suffering or likely to suffer harm, or in immediate danger

Follow the usual procedure to report to the DSL or the DDSL/or a member of SLT if the DSL is not available. If you are unable to make contact with anyone at SLT you can make a referral to the local authority children's social care and/or the police **immediately** if you believe a young

person is suffering or likely to suffer from harm or is in immediate danger. **Anyone can make a referral.**

Tell the DSL (see section 5.2) as soon as possible if you make a referral directly.

West Berkshire Safeguarding Board clearly outlines the referral pathway to refer abuse and harm for both adults and young people below. The details can be found here:

Berkshire West Safeguarding Young people Partnership –

https://www.gov.uk/report-young person-abuse-to-local-council

7.2 If a young person makes a disclosure to you

If a young person discloses a safeguarding issue to you, you should:

- Listen to and believe them. Allow them time to talk freely and do not ask leading questions
- Stay calm and do not show that you are shocked or upset
- Tell the young person they have done the right thing in telling you. Do not tell them they should have told you sooner
- Explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret
- Document your conversation onto My Concern as soon as possible in the young person's own words. Stick to the facts, and do not put your own judgement on it
- Sign and date the write-up and pass it on to the DSL. Alternatively, if appropriate, make a referral to local authority children's social care and/or the police directly (see 7.1), and tell the DSL as soon as possible that you have done so. Aside from these people, do not disclose the information to anyone else unless told to do so by a relevant authority involved in the safeguarding process.

Bear in mind that some young people may:

- Not feel ready, or know how to tell someone that they are being abused, exploited or neglected
- Not recognise their experiences as harmful
- Feel embarrassed, humiliated or threatened. This could be due to their vulnerability, disability, sexual orientation and/or language barriers

None of this should stop you from having a 'professional curiosity' and speaking to the DSL if you have concerns about a young person.

7.3 If you discover that FGM has taken place, or a student is at risk of FGM.

Keeping Children Safe in Education explains that FGM comprises "all procedures involving partial or total removal of the external female genitalia, or other injury to the female genital organs".

FGM is illegal in the UK and a form of abuse with long-lasting, harmful consequences. It is also known as 'female genital cutting', 'circumcision' or 'initiation'.

Possible indicators that a student has already been subjected to FGM, and factors that suggest a student may be at risk, are set out in appendix 4 of this policy.

Any tutor who either:

- Is informed by a girl under 18 that an act of FGM has been carried out on her; or
- Observes physical signs which appear to show that an act of FGM has been carried out on a girl under 18 and they have no reason to believe that the act was necessary for the girl's physical or mental health or for purposes connected with labour or birth

Must immediately report this to the police, personally. This is a mandatory statutory duty, and teachers will face disciplinary sanctions for failing to meet it.

Unless they have been specifically told not to disclose, they should also discuss the case with the DSL and involve local authority children's social care as appropriate.

Any other member of staff who discovers that an act of FGM appears to have been carried out on a **student under 18** must speak to the DSL and follow our local safeguarding procedures.

The duty for teachers mentioned above does not apply in cases where a student is *at risk* of FGM or FGM is suspected but is not known to have been carried out. Staff should not examine students.

Any member of staff who suspects a student is *at risk* of FGM or suspects that FGM has been carried out or discovers that a student **aged 18 or over** appears to have been a victim of FGM should speak to the DSL and follow our local safeguarding procedures.

All teachers in England have a duty to report to the police 'known' cases of Female Genital Mutilation in under 18s which they identify in the course of their professional work. Reports should be made using the non-emergency 101 telephone number. Please share this in partnership with your DSL.

Professionals (berkshirewestsafeguardingchildrenpartnership.org.uk)

7.4 If you have concerns about a young person (as opposed to believing a young person is suffering or likely to suffer from harm, or is in immediate danger)

Figure 1 below, before section 7.9, illustrates the procedure to follow if you have any concerns about a young person's welfare.

Where possible, speak to the DSL first to agree a course of action if there is immediate risk to the student otherwise please follow the usual procedure of completing your concerns via My Concern.

If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or take advice from local authority children's social care. You can also seek advice at any time from the NSPCC helpline on 0808 800 5000. Share details of any actions you take with the DSL as soon as practically possible.

Make a referral to local authority children's social care directly, if appropriate (see 'Referral' below). Share any action taken with the DSL as soon as possible.

Early help assessment

If an early help assessment is appropriate, the DSL will generally lead on liaising with other agencies and setting up an inter-agency assessment as appropriate. Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead practitioner.

We will discuss and agree, with statutory safeguarding partners, levels for the different types of assessment, as part of local arrangements.

The DSL will keep the case under constant review and the College will consider a referral to local authority children's social care if the situation does not seem to be improving. Timelines of interventions will be monitored and reviewed.

Early Help will work together to identify and assess the needs of young people and families who would benefit from Early Help. In West Berkshire, these assessments of need are known as My Family Plans. We can work Early Help to develop a My Family Plan. The Early Response Hub - West Berkshire Council

Referral

If it is appropriate to refer the case to local authority children's social care or the police, the DSL will make the referral or support you to do so.

If you make a referral directly (see section 7.1), you must tell the DSL as soon as possible.

The local authority will decide within one working day of a referral about what course of action to take and will let the person who made the referral know the outcome. The DSL or person who made the referral must follow up with the local authority if this information is not made available, and ensure outcomes are properly recorded.

If the young person's situation does not seem to be improving after the referral, the DSL or person who made the referral must follow local escalation procedures to ensure their concerns have been addressed and that the young person's situation improves which can be found here: Berkshire West Safeguarding Children Partnership - Professionals

We will make referrals using the West Berkshire Thresholds document which can be found here: Berkshire West Safeguarding Children Partnership - West Berkshire Threshold Guidance

7.5 If you have concerns about extremism

If a young person is not suffering or likely to suffer from harm, or in immediate danger, where possible speak to the DSL first to agree a course of action.

If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or seek advice from local authority children's social care. Make a referral to local authority children's social care directly, if appropriate (see 'Referral' above). Inform the DSL or deputy as soon as practically possible after the referral.

Where there is a concern, the DSL will consider the level of risk and decide which agency to make a referral to. This could include the police or Channel, the government's programme for

identifying and supporting individuals at risk of becoming involved with or supporting terrorism, or the local authority children's social care team.

The DfE also has a dedicated telephone helpline, 020 7340 7264, which College staff and governors can call to raise concerns about extremism with respect to a student. You can also email counter.extremism@education.gov.uk. Note that this is not for use in emergency situations.

In an emergency, call 999 or the confidential anti-terrorist hotline on 0800 789 321 if you:

- Think someone is in immediate danger.
- Think someone may be planning to travel to join an extremist group
- See or hear something that may be terrorist-related

Details of our full Prevent Policy which outlines our approach to education, prevention and support can be found here: Prevent Policy

7.6 If you have a concern about a young person's mental health

Mental health problems can, in some cases, be an indicator that a young person has suffered or is at risk of suffering abuse, neglect or exploitation.

Staff will be alert to behavioural signs that suggest a young person may be experiencing a mental health problem or be at risk of developing one.

If you have a mental health concern about a young person that is also a safeguarding concern, take immediate action by following the steps in section 7.4.

If you have a mental health concern that is **not** also a safeguarding concern, speak to the DSL to agree a course of action.

Our Wellbeing Lead, Caroline Adshead offers a safe, non-judgmental, confidential listening space to support student emotional health and wellbeing and help to access further help with external agencies and/or signpost to additional resources. There are wide ranging well-being self-directed help tools available on the student hub.

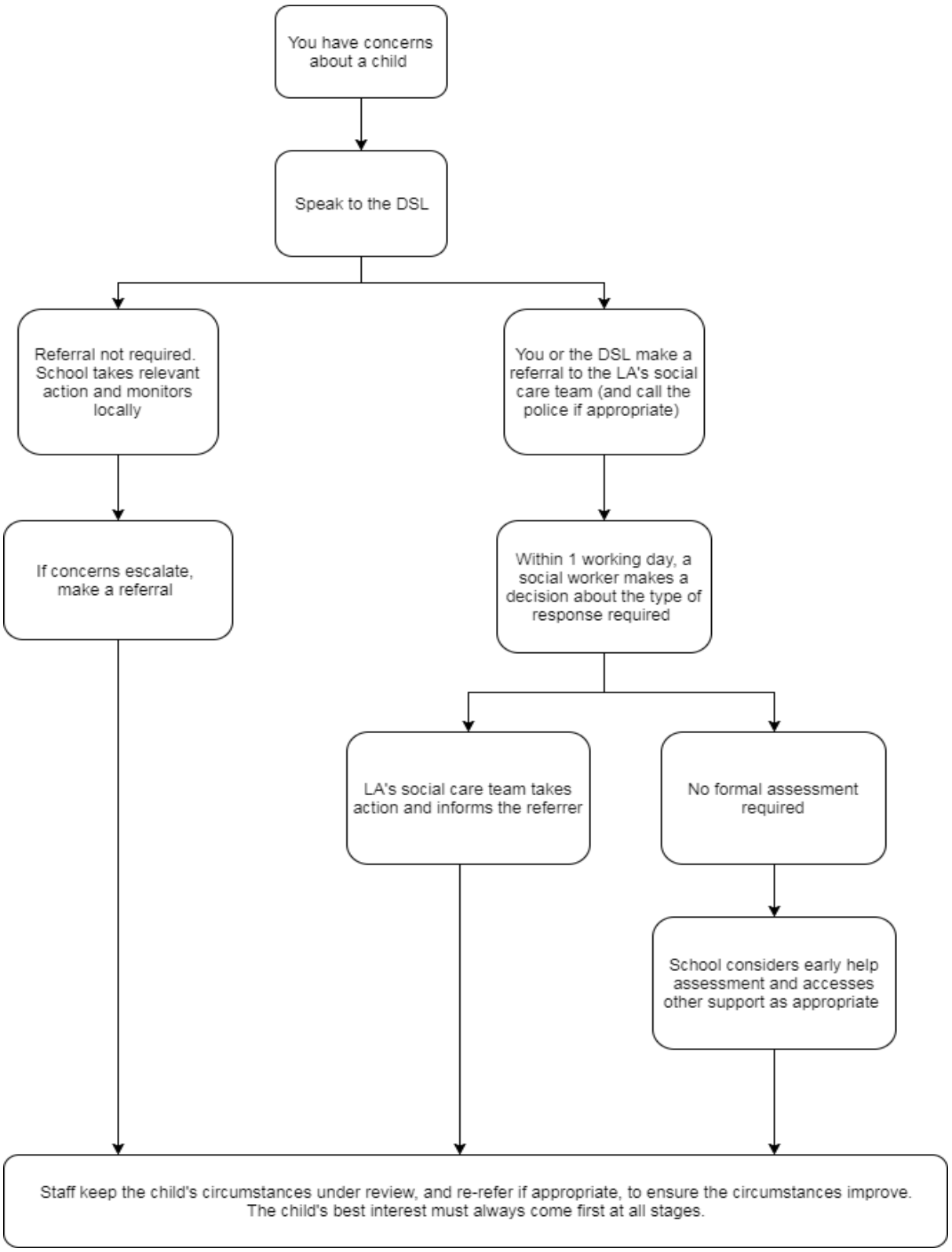
There is further guidance which can be found here form the Department for Education mental health and behaviour in Schools

7.7 If you have concerns about a student carrying a weapon.

When a young person decides to take a knife or other offensive weapon into college, it is a serious offence with potentially fatal consequences: it is critical that the reasons for possession by students are fully understood to enable proportionate early intervention to take place to reduce the likelihood of repeat possession. Newbury College has adopted and will follow the West Berkshire Educational Settings on Managing Weapons. Details of this process can be requested from the college and can be found in the Positive Behaviour Policy.

7.8 Figure 1: procedure if you have concerns about a young person's welfare (as opposed to believing a young person is suffering or likely to suffer from harm, or in immediate danger)

(Note – if the DSL is unavailable, this should not delay action. See section 7.4 for what to do.)



7.9 Safer Recruitment procedures

To make sure we recruit suitable people, we will ensure that those involved in the recruitment and employment of staff to work with young people have received appropriate safer recruitment training.

We have put the following steps in place during our recruitment and selection process to ensure we are committed to safeguarding and promoting the welfare of young people.

We will apply safer recruitment throughout our process from advertising, shortlisting, interview and selection, pre-employment checks (including social media checks), references to induction and onwards through their time with us at the College. All our staff checks, including DBS checks are recorded on the Single Central Record (SCR) which is maintained by the Vice Principal – Central Services.

We actively promote and embed an ongoing culture of vigilance in our College.

Click here for full details of our Recruitment and Selection Policy and Procedure

7.10 Concerns about a staff member

If you have concerns about a member of staff (all references to staff include agency employees, volunteers or contractors), or an allegation is made about a member of staff posing a risk of harm to young people, speak to the Principal as soon as possible. If the concerns/allegations are about the Principal, speak to the Chair of Governors, and/or the local authority designated officer (LADO).

The Principal / Chair of governors will then follow the procedures set out in the Managing Allegations against Staff Policy, if appropriate.

Where you believe there is a conflict of interest in reporting a concern or allegation about a member of staff to the Principal, report it directly to the local authority designated officer (LADO).

If you receive an allegation relating to an incident where an individual or organisation was using the College premises for running an activity for young people, follow our College safeguarding policies and procedures, informing the LADO, as you would with any safeguarding allegation.

7.11 Managing allegations against staff including low-level concerns

We are committed to keeping our students safe whilst at College. In the event where it is alleged that a current member of staff has:

- Behaved in a way that has harmed a young person, or may have harmed a young person, and/or
- Possibly committed a criminal offence against or related to a young person, and/or
- Behaved towards a young person in a way that indicates they may pose a risk of harm to young people, and/or

- Behaved or may have behaved in a way that indicates they may not be suitable to work with young people – this includes behaviour taking place both inside and outside of College (transferable risk)

If there is any doubt as to whether a concern meets the harm threshold, we will consult our local authority designated officer (LADO). Contact details are at the front of this policy.

We will deal with any allegation of abuse quickly, in a fair and consistent way that provides effective protection while also supporting the individual who is the subject of the allegation.

The Principal will appoint an 'Investigating Officer' to lead the investigation. The Governing Board Chair will lead the investigation where the principal is the subject of the allegation. The Investigating Officer will be identified at the earliest opportunity.

Our procedures for dealing with allegations will be applied with common sense and judgement. The full Managing allegations and Low-level concerns guidance is available on the staff intranet. If we receive an allegation of an incident happening while an individual or organisation was using the College premises to run activities for young people, we will follow our safeguarding policies and procedures and inform our LADO. We also operate safeguarding through our Lettings Policy Room Hire Information Pack.

Where concerns do not meet the harm threshold, we operate a low-level concern procedure for staff to raise concerns about professional conduct.

The term 'low-level' concern is any concern – no matter how small – that an adult working in or on behalf of the College may have acted in a way that:

- Is inconsistent with the staff code of conduct, including inappropriate conduct outside of work, **and**
- Does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the designated officer at the local authority.

Examples of such behaviour could include, but are not limited to:

- Being overly friendly with young people
- Having favourites
- Taking photographs of young people on their mobile phone
- Engaging with a young person on a one-to-one basis in a secluded area or behind a closed door
- Humiliating students

Please report any low-level concerns to the Vice Principal, Central Services immediately.

We will use the information collected to categorise the type of behaviour and determine any further action, in line with the College's Code of Conduct Policy. The Vice Principal, Central Services will be the decision-maker in respect of all low-level concerns, though they may wish to collaborate with the DSL and the Principal.

7.12 Allegations of abuse made against other students.

We recognise that young people are capable of abusing their peers. Abuse will never be tolerated or passed off as "banter", "just having a laugh" or "part of growing up", as this can lead to a culture of unacceptable behaviours and an unsafe environment for students.

We also recognise the gendered nature of child-on-child abuse. However, all child-on-child abuse is unacceptable and will be taken seriously.

Most cases of students hurting other students will be dealt with under our College's behaviour policy, but this safeguarding policy will apply to any allegations that raise safeguarding concerns. This might include where the alleged behaviour:

Is serious, and potentially a criminal offence.

Could put students in the College at risk.

Is violent.

Involves students being forced to use drugs or alcohol.

Involves sexual exploitation, sexual abuse or sexual harassment, such as indecent exposure, sexual assault, upskirting or sexually inappropriate pictures or videos (including the sharing of nudes and semi-nudes)

See appendix 3 for more information about child-on-child abuse.

Procedures for dealing with allegations of child-on-child abuse.

If a student makes an allegation of abuse against another student:

You must record the allegation and tell the DSL, but do not investigate it.

The DSL will contact the local authority children's social care team and follow its advice, as well as the police if the allegation involves a potential criminal offence.

The DSL will put a risk assessment and support plan into place for all young people involved (including the victim(s), the young person against whom the allegation has been made and any others affected) with a named person they can talk to if needed. This will include considering College transport as a potentially vulnerable place for a victim or alleged perpetrator(s)

The DSL will contact the young people and adolescent mental health services (CAMHS), if appropriate

If the incident is a criminal offence and there are delays in the criminal process, the DSL will work closely with the police (and other agencies as required) while protecting young people and/or taking any disciplinary measures against the alleged perpetrator. We will ask the police if we have any questions about the investigation.

The College will follow the Safety planning in education guidance from the Centre of Expertise on child sexual abuse for recording, investigating and dealing with allegations, and supporting victims, perpetrators and any other young people affected.

Creating a supportive environment in College and minimising the risk of child-on-child abuse

We recognise the importance of taking proactive action to minimise the risk of child-on-child abuse, and of creating a supportive environment where victims feel confident in reporting incidents.

To achieve this, we will:

Challenge any form of derogatory or sexualised language or inappropriate behaviour between peers, including requesting or sending sexual images

Be vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female students, and initiation or hazing type violence with respect to boys

Ensure our curriculum helps to educate students about appropriate behaviour and consent

Ensure students are able to easily and confidently report abuse using our reporting systems (as described in section 7.10 below)

Ensure staff reassure victims that they are being taken seriously.

Be alert to reports of sexual violence and/or harassment that may point to environmental or systemic problems that could be addressed by updating policies, processes and the curriculum, or could reflect wider issues in the local area that should be shared with safeguarding partners

Support young people who have witnessed sexual violence, especially rape or assault by penetration. We will do all we can to make sure the victim, alleged perpetrator(s) and any witnesses are not bullied or harassed

Consider intra-familial harms and any necessary support for siblings following a report of sexual violence and/or harassment.

Ensure staff are trained to understand:

- How to recognise the indicators and signs of child-on-child abuse, and know how to identify it and respond to reports
- That even if there are no reports of child-on-child abuse in College, it does not mean it is not happening – staff should maintain an attitude of "it could happen here"
- That if they have any concerns about a young person's welfare, they should act on them immediately rather than wait to be told, and that victims may not always make a direct report. For example:
    - Young people can show signs or act in ways they hope adults will notice and react to
    - A friend may make a report.
    - A member of staff may overhear a conversation.
    - A young person's behaviour might indicate that something is wrong

- That certain young people may face additional barriers to telling someone because of their vulnerability, disability, gender, ethnicity and/or sexual orientation
- That a student harming a peer could be a sign that the young person is being abused themselves, and that this would fall under the scope of this policy.
- The important role they have to play in preventing child-on-child abuse and responding where they believe a young person may be at risk from it
- That they should speak to the DSL if they have any concerns.
- That social media is likely to play a role in the fall-out from any incident or alleged incident, including for potential contact between the victim, alleged perpetrator(s) and friends from either side

The DSL will take the lead role in any disciplining of the alleged perpetrator(s). We will provide support at the same time as taking any disciplinary action.

Disciplinary action can be taken while other investigations are going on, e.g. by the police. The fact that another body is investigating or has investigated an incident doesn't (in itself) prevent our College from coming to its own conclusion about what happened and imposing a penalty accordingly. We will consider these matters on a case-by-case basis, taking into account whether:

Taking action would prejudice an investigation and/or subsequent prosecution – we will liaise with the police and/or local authority children's social care to determine this

There are circumstances that make it unreasonable or irrational for us to reach our own view about what happened while an independent investigation is ongoing.

7.12 Sharing of nudes and semi-nudes ('sexting')

Your responsibilities when responding to an incident.

If you are made aware of an incident involving the consensual or non-consensual sharing of nude or semi-nude images/videos, including pseudo-images, which are computer-generated images that otherwise appear to be a photograph or video (also known as 'sexting' or 'youth produced sexual imagery'), you must report it to the Safeguarding team immediately.

You must **not**:

View, copy, print, share, store or save the imagery yourself, or ask a student to share or download it (if you have already viewed the imagery by accident, you must report this to the Safeguarding team)

Delete the imagery or ask the student to delete it

Ask the student(s) who are involved in the incident to disclose information regarding the imagery (this is the DSL's responsibility)

Share information about the incident with other members of staff, the student(s) it involves or their, or other, parents and/or carers.

Say or do anything to blame or shame any young people involved.

You should explain that you need to report the incident and reassure the student(s) that they will receive support and help from the Safeguarding team.

Initial review meeting

Following a report of an incident, the DSL will hold an initial review meeting with appropriate College staff – this may include the staff member who reported the incident and the safeguarding or leadership team that deals with safeguarding concerns. This meeting will consider the initial evidence and aim to determine:

Whether there is an immediate risk to student(s)

If a referral needs to be made to the police and/or children's social care

If it is necessary to view the image(s) in order to safeguard the young person (in most cases, images or videos should not be viewed)

What further information is required to decide on the best response

Whether the image(s) has been shared widely and via what services and/or platforms (this may be unknown)

Whether immediate action should be taken to delete or remove images or videos from devices or online services

Any relevant facts about the students involved which would influence risk assessment

If there is a need to contact another College, setting or individual

Whether to contact parents or carers of the students involved (in most cases parents/carers should be involved)

The DSL will make an immediate referral to police and/or children's social care if:

The incident involves an adult. Where an adult poses as a young person to groom or exploit a young person, the incident may first present as a child-on-child incident. See appendix 4 for more information on assessing adult-involved incidents

There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example, owing to SEN)

What the DSL knows about the images or videos suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent

The imagery involves sexual acts and any student in the images or videos is under 13

The DSL has reason to believe a student is at immediate risk of harm owing to the sharing of nudes and semi-nudes (for example, the young person is presenting as suicidal or self-harming)

If none of the above apply then the DSL, in consultation with the Principal and other members of staff as appropriate, may decide to respond to the incident without involving the police or children's social care. The decision will be made and recorded in line with the procedures set out in this policy.

Further review by the DSL

If at the initial review stage, a decision has been made not to refer to police and/or children's social care, the DSL will conduct a further review to establish the facts and assess the risks.

They will hold interviews with the students involved (if appropriate).

If at any point in the process there is a concern that a student has been harmed or is at risk of harm, a referral will be made to children's social care and/or the police immediately.

Informing parents/carers

The DSL will inform parents/carers at an early stage and keep them involved in the process, unless there is a good reason to believe that involving them would put the student at risk of harm.

Referring to the police

If it is necessary to refer an incident to the police, this will be done through immediately by contacting 101.

Recording incidents

All incidents of sharing of nudes and semi-nudes, and the decisions made in responding to them, will be recorded. The record-keeping arrangements set out in section 14 of this policy also apply to recording these incidents.

Curriculum coverage

Students are taught about the issues surrounding the sharing of nudes and semi-nudes as part of our Personal and Pastoral development (PPD) programme. Teaching covers the following in relation to the sharing of nudes and semi-nudes:

What it is

How it is most likely to be encountered

The consequences of requesting, forwarding or providing such images, including when it is and is not abusive and when it may be deemed as online sexual harassment

Issues of legality

The risk of damage to people's feelings and reputation

Students also learn the strategies and skills needed to manage:

Specific requests or pressure to provide (or forward) such images

The receipt of such images

This policy on the sharing of nudes and semi-nudes is also shared with students so they are aware of the processes the College will follow in the event of an incident.

Teaching follows best practice in delivering safe and effective education, including:

Putting safeguarding first

Approaching from the perspective of the young person

Promoting dialogue and understanding

Empowering and enabling young people

Never frightening or scare-mongering

Challenging victim-blaming attitudes

7.13 Reporting systems for our students

Where there is a safeguarding concern, we will take the young person's wishes and feelings into account when determining what action to take and what services to provide.

We recognise the importance of ensuring students feel safe and comfortable to come forward and report any concerns and/or allegations.

To achieve this, we will:

Put systems in place for students to confidently report abuse through high visibility and a dedicated safeguarding inbox safeguarding@newbury-College.ac.uk and/or use the 'See something, say something' reporting QR code.

Ensure our reporting systems are well promoted, easily understood and easily accessible for students

Make it clear to students that their concerns will be taken seriously, and that they can safely express their views and give feedback.

Students can approach a 'trusted adult' within the College or speak directly to the safeguarding team or Wellbeing led to share any concerns

We will share our reporting process through tutor time, student handbook, induction and the PPD programme/curriculum

The safeguarding team will work with both the student who has caused harm and the person who has been harmed to provide support as appropriate.

We will provide a safe and confidential space for our students to be able to share any concerns and support post disclosure through our wellbeing service or external service as appropriate.

We record all safeguarding and high-level behaviour concerns on our electronic system My Concern.

8. Online safety and the use of mobile technology

The College recognises the importance of safeguarding young people and vulnerable adults from potentially harmful and inappropriate online material, and we understand that technology is a significant component in many safeguarding and wellbeing issues.

To address this, our College aims to:

Have robust processes (including filtering and monitoring systems) in place to ensure the online safety of students, staff, volunteers and governors

Protect and educate the whole College community in the safe and responsible use of technology, including mobile and smart technology (which we refer to as 'mobile phones')

Set clear guidelines for the use of mobile phones for the whole College community

Establish clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate

The 4 key categories of risk

Our approach to online safety is based on addressing the following categories of risk:

Content – being exposed to illegal, inappropriate or harmful content, such as pornography, fake news, racism, misogyny, self-harm, suicide, antisemitism, radicalisation and extremism

Contact – being subjected to harmful online interaction with other users, such as peer-to-peer pressure, commercial advertising and adults posing as young people with the intention to groom or exploit them for sexual, criminal, financial or other purposes

Conduct – personal online behaviour that increases the likelihood of, or causes, harm, such as making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography), sharing other explicit images and online bullying; and

Commerce – risks such as online gambling, inappropriate advertising, phishing and/or financial scams

To meet our aims and address the risks above, we will:

Educate students about online safety as part of our Personal and Pastoral Development curriculum (PPD). For example:

- The safe use of social media, the internet and technology
- Keeping personal information private
- How to recognise unacceptable behaviour online
- How to report any incidents of cyber-bullying, ensuring students are encouraged to do so, including where they're a witness rather than a victim

Train staff, as part of their induction, on safe internet use and online safeguarding issues including cyber-bullying, the risks of online radicalisation, and the expectations, roles and responsibilities around filtering and monitoring. All staff members will receive refresher training as required and at least once each academic year

Educate parents/carers about online safety via our website, and communications sent directly to parents. We will also share clear procedures with them, so they know how to raise concerns about online safety

Make sure staff are aware of any restrictions placed on them with regards to the use of their mobile phone and cameras, for example that:

- Staff are allowed to bring their personal phones to College for their own use, but will limit such use to non-contact time when students are not present

- Staff will not take pictures or recordings of students on their personal phones or cameras

Make all students, parents/carers, staff, volunteers and governors aware that they are expected to sign an agreement regarding the acceptable use of the internet in College, use of the College's ICT systems and use of their mobile and smart technology

Explain the sanctions we will use if a student is in breach of our policies on the acceptable use of the internet and mobile phones

Make sure all staff, students and parents/carers are aware that staff have the power to search young students' phones, as set out in the DfE's guidance on searching, screening and confiscation

Put in place robust filtering and monitoring systems to limit young people's exposure to the 4 key categories of risk (described above) from the College's IT systems.

We will conduct an annual review of our approach to online safety, supported by an annual risk assessment that considers and reflects the risks faced by our College community.

Provide regular safeguarding and child protection updates including online safety to all staff, at least annually, in order to continue to provide them with the relevant skills and knowledge to safeguard effectively.

Review the safeguarding policy, including online safety, annually and ensure the procedures and implementation are updated and reviewed regularly.

This section summarises our approach to online safety and mobile phone use. For full details about our College's policies in these areas, please refer to our online safety policy here: Policies Student and staff code of conduct handbooks which can be found on our internal intranet.

8.1 Artificial intelligence (AI)

Generative artificial intelligence (AI) tools are now widespread and easy to access. Staff, students and parents/carers may be familiar with generative chatbots such as ChatGPT and Google Bard.

The College recognises that AI has many uses, including enhancing teaching and learning, and in helping to protect and safeguard students. However, AI may also have the potential to facilitate abuse (e.g. bullying and grooming) and/or expose students to harmful content. For example, in the form of 'deepfakes', where AI is used to create images, audio or video hoaxes that look real.

The College will treat any use of AI to access harmful content or bully students in line with this policy and our Behaviour policy.

Staff should be aware of the risks of using AI tools whilst they are still being developed and should carry out risk assessments for any new AI tool being used by the College.

8.2 Notifying parents or carers

Where appropriate, we will discuss any concerns about a student with the student's parents or carers. Parent refers to those with parental responsibility, as defined by the Children Act 1989.

The DSL will normally do this in the event of a suspicion or disclosure.

Other staff will only talk to parents or carers about any such concerns following consultation with the DSL.

If we believe that notifying the parents or carers would increase the risk to the young person, we will discuss this with the local authority children's social care team before doing so.

In the case of allegations of abuse made against other young people, we will normally notify the parents or carers of all the young people involved. We will think carefully about what information we provide about the other young person involved, and when. We will work with the police and/or local authority children's social care to make sure our approach to information sharing is consistent.

The DSL will, along with any relevant agencies (this will be decided on a case-by-case basis):

Meet with the victim's parents or carers, with the victim, to discuss what's being put in place to safeguard them, and understand their wishes in terms of what support they may need and how the report will be progressed

Meet with the alleged perpetrator's parents or carers to discuss support for them, and what's being put in place that will impact them, e.g. moving them out of classes with the victim, and the reason(s) behind any decision(s)

9. Notifying parents or carers

Where appropriate, we will discuss any concerns about a student with the student's parents or carers. Parent refers to those with parental responsibility, as defined by the Children Act 1989.

The DSL will normally do this in the event of a suspicion or disclosure.

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In the case of allegations of abuse made against other young people, we will normally notify the parents or carers of all the young people involved. We will think carefully about what information we provide about the other young person involved, and when. We will work with the police and/or local authority children's social care to make sure our approach to information sharing is consistent.

The DSL will, along with any relevant agencies (this will be decided on a case-by-case basis):

Meet with the victim's parents or carers, with the victim, to discuss what's being put in place to safeguard them, and understand their wishes in terms of what support they may need and how the report will be progressed

Meet with the alleged perpetrator's parents or carers to discuss support for them, and what's being put in place that will impact them, e.g. moving them out of classes with the victim, and the reason(s) behind any decision(s)

10. Students with special educational needs, disabilities or health issues including foundation learning students

We recognise that students with SEND, or certain health conditions can face additional safeguarding challenges. Young people with disabilities are more likely to be abused than their peers. Additional barriers can exist when recognising abuse, exploitation and neglect in this group, including:

Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the young person's condition without further exploration

Students being more prone to peer group isolation or bullying (including prejudice-based bullying) than other students

The potential for students with SEN, disabilities or certain health conditions being disproportionally impacted by behaviours such as bullying, without outwardly showing any signs

Communication barriers and difficulties in managing or reporting these challenges

Cognitive understanding – being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in College or the consequences of doing so

A fully inclusive, sequenced programme which mirrors the mainstream PPD programme has been adapted and differentiated to meet the needs of our foundation learning students and other students with SEN.

There is a dedicated DDSL, Leanne Butters, High Needs Head of Department who oversees all safeguarding concerns for our foundation students. We have extensive support through the High Needs Coordinator, leading on EHCP plans and our PASC Support team.

11. Students with a social worker

Students may need a social worker due to safeguarding or welfare needs. We recognise that a young person's experiences of adversity and trauma can leave them vulnerable to further harm as well as potentially creating barriers to attendance, learning, behaviour and mental health.

The DSL and all members of staff will work with and support social workers to help protect vulnerable young people.

Where we are aware that a student has a social worker, the DSL will always consider this fact to ensure any decisions are made in the best interests of the student's safety, welfare and educational outcomes. For example, it will inform decisions about:

Responding to unauthorised absence or missing education where there are known safeguarding risks

The provision of pastoral and/or academic support

12. Looked-after and previously looked-after young people

We will ensure that staff have the skills, knowledge and understanding to keep looked-after young people and previously looked-after young people safe. In particular, we will ensure that:

Appropriate staff have relevant information about young people's looked after legal status, contact arrangements with birth parents or those with parental responsibility, and care arrangements.

The DSL has details of young people's social workers and relevant Virtual College heads.

We have appointed a designated teacher, Shelbie Clucas, Safeguarding Officer, who is responsible for promoting the educational achievement of looked-after young people and previously looked-after young people in line with statutory guidance. Her contact details can be found in appendix 4.

The designated teacher is appropriately trained and has the relevant experience to perform the role.

As part of their role, the designated teacher will:

Work closely with the DSL to ensure that any safeguarding concerns regarding Children in Care (CiC) and Care Leavers are quickly and effectively responded to

Work with virtual College heads to promote the educational achievement of looked-after and previously looked-after young people, including discussing how student premium plus funding can be best used to support looked-after young people and meet the needs identified in their personal education plans

13. Students who are lesbian, gay, bisexual or gender questioning

We recognise that students who are (or who are perceived to be) lesbian, gay, bisexual, transgender or gender questioning (LGBTQ+) can be targeted by other young people. See our Positive Behaviour policy for more detail on how we prevent bullying based on gender or sexuality.

We also recognise that LGBTQ+ young people are more likely to experience poor mental health. Any concerns should be reported to the Safeguarding team or our Positive Behaviour Coaches.

When families/carers are making decisions about support for gender questioning students, they should be encouraged to seek clinical help and advice. This should be done as early as possible when supporting pre-pubertal young people.

When supporting a gender questioning student, we will take a cautious approach as there are still unknowns around the impact of social transition, and a student may have wider vulnerability, such as complex mental health and psychosocial needs, and in some cases, autism spectrum disorder (ASD) and/or attention deficit hyperactivity disorder (ADHD).

We will also consider the broad range of their individual needs, in partnership with their parents/carers (other than in rare circumstances where involving parents/carers would constitute a significant risk of harm to the student). We will also include any clinical advice that is available and consider how to address wider vulnerabilities such as the risk of bullying.

Risks can be compounded where young people lack trusted adults with whom they can be open. We therefore aim to reduce the additional barriers faced and create a culture where students can speak out or share their concerns with members of staff.

Part 2: Adult Safeguarding

14. Purpose and Commitment

14.1 Purpose

The College believes every adult has the right to live free from abuse or neglect regardless of age, ability or disability, sex, race, religion, ethnic origin, sexual orientation, marital or gender status.

The College is committed to creating and maintaining a safe and positive environment and an open, listening culture where people feel able to share concerns without fear of retribution.

The College acknowledges that safeguarding is everybody's responsibility and is committed to prevent abuse and neglect through safeguarding the welfare of all adults involved.

The College recognises that health, well-being, ability, disability and need for care and support can affect a person's resilience. We recognise that some people experience barriers, for example, to communication in raising concerns or seeking help. We recognise that these factors can vary at different points in people's lives.

Actions taken by the College will be consistent with the principles of adult safeguarding ensuring that any action taken is prompt, proportionate and that it includes and respects the voice of the adult concerned.

14.2 Commitment

This safeguarding adult policy applies to all individuals involved in the College including Board members, Staff, Coaches, Volunteers and to all concerns about the safety of adults whilst taking part in our organisation, its activities and in the wider community.

We expect our partner organisations and employers to adopt and demonstrate their commitment to the principles and practice as set out in this policy.

We have a diverse range of adult students across the College and UCN which include Apprentices, Higher Education (HE) Learners, learners in the FENNS area (Functional English for Non-Native Speakers), Community based courses, short courses, distance learners, Skills Bootcamps and adult Foundation learners.

We will work to ensure all our students and employers have access to appropriate safeguarding and wellbeing information, advice and guidance, including self-directed help.

We work with relevant to support our students, as well as providing a range of internal signposting services through the student hub.

15. Definition and legislation

15.1 Definition

Adults at risk are defined in the statutory guidance issued under the Care Act 2014 as:

'An adult at risk is an individual aged 18 years and over who:

- has needs for care and support (whether or not the local authority is meeting any of those needs) and;
- is experiencing, or at risk of, abuse or neglect, and;
- as a result of those care and support needs is unable to protect themselves from either the risk of, or the experience of abuse or neglect.'

We will support our vulnerable adult students by:

- protecting the rights of adults to live in safety, free from abuse and neglect.
- working together with our students and organisations to prevent and stop both the risks and experience of abuse or neglect.
- making sure that the student's wellbeing is promoted including, where appropriate, taking fully into account their views, wishes, feelings and beliefs in deciding on any action;
- recognising that adults sometimes have complex interpersonal relationships and may be ambivalent, unclear or unrealistic about their personal circumstances and therefore potential risks to their safety or wellbeing.

Assessing whether someone meets these criteria should involve understanding their personal

characteristics (e.g. a disability) and their life circumstances (e.g. in a domestic violence situation). It is also recognised that the process of being abused or neglected can make someone, normally over time, more vulnerable and therefore more likely to meet the criteria.

15.2 Legislation

We acknowledge our responsibilities towards safeguarding groups and adults at risk identified under the following legislation (not exhaustive):

• Counterterrorism and Security Act (2015)

• Data Protection Act 2018 & General Data Protection Regulations 2018

• Disclosure and Barring Service requirements

• Domestic Violence and Crime Act (2004)

• Equality Act (2010)

• Human Rights Act (1998)

• Mental Health Act (1983) as amended (2007)

• Safeguarding Vulnerable Groups Act (2006)

• Sexual Offences Act (2003)

• The Care Act 2014

• The Mental Capacity Act 2005

• The Protections of Freedoms Act (2012)

The Safeguarding Adults Board (SAB) covers the West Berkshire, Reading and Wokingham areas, and brings together agencies that work together to prevent abuse. We are connected into the West Berkshire Adults Safeguarding Board.

The key aims of the SAB are to:

- Ensure that whenever abuse or neglect is suspected or reported, there is an effective, consistent, and coordinated response across the West of Berkshire.

- Ensure that partner agencies have preventative measures in place to lessen the likelihood of abuse occurring

- Increase the awareness of safeguarding issues amongst the general public, carers, service users, voluntary and paid workers

- Provide a framework for the further inter-agency development of safeguarding policy, including learning lessons from practice in Berkshire

- Provide positive safeguarding outcomes for service users, which are best achieved by robust and effective inter-agency working

16. Indicators of abuse and neglect

Abuse is a violation of an individual's human and civil rights by another person or persons. It can occur in any relationship and may result in significant harm to, or exploitation of, the person subjected to it. Any or all of the following types of abuse may be perpetrated as the result of deliberate intent, negligence, omission or ignorance.

There are different types and patterns of abuse and neglect and different circumstances in which they may take place, as defined in The Care Act 2014.

- Physical
- Sexual
- Emotional/Psychological/Mental
- Neglect and acts of Omission.
- Financial or material abuse
- Discriminatory
- Organisational / Institutional
- Self-neglect
- Domestic Abuse (including coercive control)
- Modern slavery

In some cases, individuals are placed at risk due to the environment or the beliefs, actions or aggressions of other people. Examples of this include instances such as:

- stalking, hate crimes (mate/hate) or other forms of harassment.
- domestic violence/coercive control, sexual abuse.
- human trafficking
- financial (scams) or material abuse;
- homelessness;
- refugees/asylum seeker status.

See appendix 1 for full details of these abuse types.

In such cases the College will work with the person concerned and relevant authorities such as Social Care, Police or the NHS Integrated Care Board (ICB) services to support that individual and undertake all reasonable actions to safeguard them.

17. Person Cantered Safeguarding/ Making Safeguarding Personal

The legislation also recognises that adults make choices that may mean that one part of our well-being suffers at the expense of another. None of us can make these choices for another

adult. If we are supporting someone to make choices about their own safety we need to understand *what are the students' concerns* and what outcomes they want to achieve from any actions we and any other agencies take to help them to protect themselves.

The College will engage the concept of 'Person Centred Safeguarding' and 'Making Safeguarding Personal' which means engaging the student in a conversation about how best to respond to their situation in a way that enhances their involvement, choice and control, as well as improving their quality of life, well-being and safety.

We will consider the adult student's views, wishes, feelings and beliefs when decisions are made about how to support them to be safe. There may be many ways to prevent further harm and help them to find the solution that is right for them. We will treat our students with respect, enhancing their dignity and supporting their ability to make decisions which also helps promote people's sense of self-worth and supports recovery from abuse.

If someone has difficulty making their views and wishes known, then they can be supported or represented by a professional advocate or a safe family member or friend of their choice. We work on the six principles of safeguarding listed below.

The Principles of Adult Safeguarding include:

- **Empowerment** - People being supported and encouraged to make their own decisions and informed consent.
- **Prevention** – It is better to take action before harm occurs.
- **Proportionality** – The least intrusive response appropriate to the risk presented.
- **Protection** – Support and representation for those in greatest need.
- **Partnership** – Local solutions through services working with their communities. Communities have a part to play in preventing, detecting and reporting neglect and abuse
- **Accountability** – Accountability and transparency in delivering safeguarding.

18. Mental Capacity and Decision Making

A person's ability to make an informed decision may be affected by things such as learning disability, dementia, mental health needs, acquired brain injury and physical ill health.
The Law says that to make a decision we need to:

- Understand information
- Remember it for long enough

- Think about the information
- Communicate our decision

Most adults can make their own decisions given the right support however, some adults with care and support needs have the experience of other people making decisions about them and for them.

If someone has a disability that means they need support to understand or make a decision this must be provided. A small number of people cannot make any decisions. Being unable to make a decision is called “lacking mental capacity”.

Mental capacity refers to the ability to make a decision at the time that decision is needed. A person’s mental capacity can change, therefore at the College we recognise this so we will wait until the adult is able to be involved in decision making or to make the decision themselves within reason.

For example:

- A person with epilepsy may not be able to make a decision following a seizure.
- Someone who is anxious may not be able to make a decision at that point.
- A person may not be able to respond as quickly if they have just taken some medication that causes fatigue.

We will ensure an ‘adult at risk’ has choices in the actions taken to safeguard them, including whether or not they want other people informed about what has happened, however, in some situations the adult may not have the mental capacity to understand the choice or to tell you, their views.

We will refer to the ‘Fitness to Practise' Policy to support our students who may need support with mental health and decision making.

We can only make decisions for other people if they cannot do that for themselves at the time the decision is needed. We will apply these principles in our decision making:

If the decision can wait, we will wait – e.g. to get help to help the person make their decision or until they can make it themselves.

If we have to make a decision for someone else, then we must make the decision in their best interests (for their benefit) and take into account what we know about their preferences and wishes.

If the action we are taking to keep people safe will restrict them then we must think of the way to do that which restricts to their freedom and rights as little as possible.

If an adult who has a lot of difficulty making their own decisions is thought to be being abused or neglected, we will refer to the Local Authority, and this will result in health or social care

professionals making an assessment of mental capacity and/or getting the person the support they need to make decisions.

19. Information sharing and Confidentiality

19.1 Information sharing

The College will normally seek to work within the parameters of the Data Protection Act 2018 and the UK General Data Protection Regulation (GDPR).

The College is permitted to share personal and sensitive information with relevant parties should it be believed that an adult is at risk of harm. Where we believe that the situation is such that an adult individual is unable to make an informed decision, confidentiality may be breached to protect that individual.

Where such instances occur, the Designated Safeguarding Lead will take advice from relevant

professional teams and consult with the Data Protection Officer before releasing any information.

There are also many situations in which it is perfectly legal to share information about adult safeguarding concerns outside the organisation. Importantly personal information can be shared with the consent of the adult concerned. However, the adult may not always want information to be shared. This may be because they fear repercussions from the person causing harm or are scared that they will lose control of their situation to statutory bodies or because they feel embarrassed. Their wishes should be respected unless there are over-riding reasons for sharing information.

The circumstances when we need to share information without the adult's consent include those where:

- it is not safe to contact the adult to gain their consent – i.e. it might put them or the person making contact at further risk.
- you believe they or someone else is at risk, including young people.
- you believe the adult is being coerced or is under duress.
- it is necessary to contact the police to prevent a crime, or to report that a serious crime has been committed.
- the adult does not have mental capacity to consent to information being shared about them.
- the person causing harm has care and support needs.
- When information is shared without the consent of the adult, we will explain this to them, when it is safe to do so, and any further actions should still fully include them.

Any decision to share or not to share information with an external person or organisation will be recorded together with the reasons to share or not share information.

We will require adult students to disclose any convictions and cautions that might directly impact younger students at the College. This may not automatically disqualify them from their chosen course, but we will need to assess any risks involved. We will handle these situations on a case-by-case basis.

19.2 Confidentiality

Staff will only be informed of relevant information about safeguarding cases on a 'need-to-know' basis. If information is shared with appropriate staff, they must maintain confidentiality. If there is a safeguarding concern, it must be reported to the Designated Safeguarding Lead/Safeguarding team and may require further investigation by the appropriate authorities. Students can be assured that only those who truly need to know will be informed, and that the information will be shared on a need-to-know basis while also ensuring that it remains private, but we will discuss this with the student first.

Where students are undertaking work placements, work experience, industry placements and/or are on an apprenticeship, tutors and employers will only be informed of pertinent information about safeguarding cases after discussion with the student first. The reason for sharing this information is to enable a holistic plan of support both in work and at College. We will work together with external partners and employers to ensure the support and best outcome is in place for the student.

If information is shared with appropriate staff, they must maintain the confidentiality.

20. Managing Concerns

20.1 If you have concerns about a vulnerable adult

Please discuss your concerns with the DSL/safeguarding team. You should make a referral on My Concern outlining your concerns as soon as possible detailing your concerns, ensuring they are factual and not your opinion and any support or discussion that have already taken place. Please see 7.1 for details on how to handle a disclosure and help keep the student calm. If possible and safe to do so, seek the consent of the adult that you are sharing your concerns with safeguarding.

If it is appropriate to refer the case to local authority adult social care, mental health services or the police, the DSL will make the referral or support you to do so. If you make a referral directly, you must tell the DSL as soon as possible.

For any students carrying weapons please see 7.7. We will follow the West Berkshire Weapons guidance.

If an adult is in imminent danger themselves or there is danger to someone else, and you are not able to access the DSL/DDSL, please call 999.

20.2 Concerns about a staff member

If you have concerns about a member of staff (all references to staff include agency employees, volunteers or contractors)or an allegation is made about a member of staff posing a risk of harm to an adult student, speak to the Principal as soon as possible. If the concerns/allegations are about the Principal, speak to the chair of governors.

The Principal /Chair of governors will then follow the procedures set out in the Managing Allegations against Staff Policy, if appropriate.

If the concerns/allegations are about the Principal, speak to the Chair of Governors, Sally Osmond.

The College will follow the Berkshire Framework-for-the-management-of-allegations-against-people-in-positions-of-trust-pipot to investigate any concerns or allegations that relate to a person who works with adults with care and support needs who has:

• Behaved in a way that has harmed or may have harmed an adult or child.

• Committed a criminal offence against, or related to, an adult or child.

• Behaved towards an adult or child in a way that indicates they may pose a risk of harm to adults

with care and support needs or a child.

Berkshire Safeguarding Adults - Appendix Seven: Allegation Management Framework/Person in a Position of Trust (PiPoT)

20.3 Concerns about radicalisation or extremism

If you have any concerns relating to extremism or terror related in the first, please speak to the DSL or a member of the safeguarding team immediately. You should also complete a referral on My Concern detailing your concerns. You do not need to seek consent from the student to share these concerns at this time.

The DfE has a dedicated telephone helpline, 020 7340 7264, which College staff and governors can call to raise concerns about extremism with respect to a student. You can also email counter.extremism@education.gov.uk. Note that this is not for use in emergency situations.

In an emergency, call 999 or the confidential anti-terrorist hotline on 0800 789 321 if you:

- Think someone is in immediate danger.
- Think someone may be planning to travel to join an extremist group.
- See or hear something that may be terrorist related.

Details of our full Prevent Policy which outlines our approach to education, prevention and support can be found here: Prevent Strategy.docx

20.4 Mental Health concerns

If you have a mental health concern, speak to the DSL to agree a course of action.

Our Wellbeing Lead, offers a safe, non-judgmental, confidential listening space to support student emotional health and wellbeing and help to access further help with external agencies and/or signpost to additional resources. There are wide ranging well-being self-directed help tools available on the student hub which students can access.

If there are safeguarding concerns alongside mental health concerns the safeguarding team will work to ensure the person is immediately safeguarding (if they are a danger to themselves and/or others) and/or support students to make contact with mental health services.

20.5 Digital safety

Online usage by students and staff is actively monitored to detect any content promoting terrorism, radicalisation, self-harm, or inappropriate sexual materials on College devices. Any concerns of this nature are managed by the safeguarding team. Please see section 8 for the College's approach to online safety. The student handbook and induction will detail our expectations of the ICT policy use.

We will promote how to keep safe online through targeted messages to students on awareness days, College screens and student hub.

20.6 Wider safeguarding support

We will work with our students and external services to address safeguarding issues including honour-based abuse (forced marriage/FGM), domestic abuse, and coercive control, in order to ensure the safety and dignity of our students. This list is not exhaustive.

Part 3 Areas relevant to both vulnerable adults and young people

21. Complaints and concerns about College safeguarding policies/procedures

21.1 Complaints against staff

Complaints against staff that are likely to require a safeguarding investigation will be handled in accordance with our procedures for dealing with allegations of abuse made against staff by students. The policy can be found here: Policies

21.2 Other complaints

All complaints including safeguarding should follow the College complaints process unless there is imminent danger then the Director of Safeguarding should be contacted immediately. The complaint process can be found here: Complaints Policy and Procedure (newbury-College.ac.uk)

21.3 Whistleblowing

The College operates a Whistleblowing Policy procedure which is clear and transparent. We promote the NSPCC Whistleblowing helpline across the College Whistleblowing Advice Line | NSPCC

The policy covers malpractice including the abuse of students and/or staff.

You can contact the Vice Principal – Central Services to report any concerns about staff concerns.

22. Record-keeping

We will hold records in line with our records retention schedule.

All safeguarding concerns, discussions, decisions made and the rationale for those decisions, must be recorded in writing. This should include instances where referrals were or were not made to another agency such as local authority children's social care or the Prevent programme, etc. If you are in any doubt about whether to record something, discuss it with the DSL.

Records will include:

A clear and comprehensive summary of the concern

Details of how the concern was followed up and resolved

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

Concerns and referrals will be kept in a separate young person protection file for each young person.

Any non-confidential records will be readily accessible and available. Confidential information and records will be held securely and only available to those who have a right or professional need to see them.

Safeguarding records relating to individual young people and vulnerable adults will be retained for a reasonable period of time after they have left the College.

If a young person or vulnerable adult for whom the College has, or has had, safeguarding concerns moves to another College/place of work, the DSL will ensure that their young person protection file is forwarded as soon as possible, securely, and separately from the main student file.

To allow the new College to have support in place when the young person arrives, this should be within:

5 days for an in-year transfer, or within

The first 5 days of the start of a new term

In addition, if the concerns are significant or complex, and/or social services are involved, the DSL will speak to the DSL of the receiving College and provide information to enable them to have time to make any necessary preparations to ensure the safety of the young person.

Our safeguarding records are kept electronically on a system called My Concern. We will share information with external services with student and parent consent when and where appropriate. Students can give their own consent if they have the capacity to understand and are able to make informed choices. For any serious safeguarding concerns where a young person may be at risk, we will share information in line with the local safeguarding procedures.

In addition:

Our Recruitment and Selection policy covers record keeping with respect to recruitment and pre-appointment checks

Our Managing allegations policy covers record-keeping with respect to allegations of abuse made against staff

23. Training

23.1 All staff

All staff members will undertake safeguarding and child protection training at induction, including on whistle-blowing procedures and online safety, to ensure they understand the College's safeguarding systems and their responsibilities, and can identify signs of possible abuse, exploitation or neglect.

This training will be regularly updated and will:

Be integrated, aligned and considered as part of the whole-college safeguarding approach and wider staff training, and curriculum planning

Be in line with advice from the three safeguarding partners for both adults and children's safeguarding boards

Include online safety, including an understanding of the expectations, roles and responsibilities for staff around filtering and monitoring

Have regard to the Teachers' Standards to support the expectation that all teachers/tutors:

- Manage behaviour effectively to ensure a good and safe environment
- Have a clear understanding of the needs of all students

All staff will have training on the government's anti-radicalisation strategy, Prevent, to enable them to identify young people and adults at risk of becoming involved with or supporting terrorism, and to challenge extremist ideas.

Staff will also receive regular safeguarding and young person protection updates, including on online safety, as required but at least annually (for example, through emails, e-bulletins, 7-minute briefings, 'lunch and learn' sessions, and staff meetings).

Contractors , such as those employed as part of the College private finance initiative (PFI) or similar contract will also receive safeguarding training through their own organisations. This is reviewed through the Service Level Agreement (SLA) in place.

Volunteers will receive appropriate training, in line with their role.

23.2 The DSL and deputies

The DSL and all deputies will undertake relevant child protection and safeguarding training at least every two years.

Deputy DSL's networks run termly to help share best practice and upskill on the latest national and local developments.

In addition, they will update their knowledge and skills at regular intervals and at least annually (for example, through e-bulletins, meeting other DSLs, networking, or taking time to read and digest safeguarding developments).

The DSL is the Prevent lead, and will also undertake more in-depth Prevent awareness training, including on extremist and terrorist ideologies.

23.3 Governors

All governors receive training about safeguarding and child protection (including online safety) at induction, which is regularly updated. They also receive regular updates through 7-minute briefings on a range of safeguarding topics. This is to make sure that they:

Have the knowledge and information needed to perform their functions and understand their responsibilities, such as providing strategic challenge

Can be assured that safeguarding policies and procedures are effective and support the College to deliver a robust whole-College approach to safeguarding

As the chair of governors may be required to act as the 'case manager' in the event that an allegation of abuse is made against the Principal, they receive training in managing allegations for this purpose.

23.4 Safer Recruitment – interview panels

At least 1 person conducting any interview for any post involving supporting young people at the College will have undertaken safer recruitment training. This will cover, as a minimum, the contents of Keeping Young Children Safe in Education, and will be in line with local safeguarding procedures and best practice.

Further details on safer recruitment can be found in our Recruitment and Selection Policy and Procedure

24. Monitoring arrangements

This policy will be reviewed **annually** by the Director of Safeguarding and Support. At every review, it will be approved by the full governing board.

24.1 Inspection

All inspections by Ofsted use Education inspection framework (EIF) - GOV.UK (www.gov.uk)

We also work within the Office for Students and The Quality Assurance Agency for Higher Education (qaa.ac.uk) framework and best practice.

Inspectors will always report on the effectiveness of arrangements for safeguarding young people and

students.

Appendix 1: Indicators of adult abuse and neglect

Physical abuse:

- observed or reported ill-treatment of an adult, which may or may not cause physical injury. Evidence of hitting, slapping, pushing, kicking, inappropriate restraint, withholding or misuse of medication, squeezing or biting;
- actions which are motivated by prejudice and/or discrimination e.g. racial,
- homophobic or religiously motivated attacks;
- a requirement for someone to work in an unsafe environment can be construed
- as physical abuse;
- physical injuries, dehydration, poor skin condition or skin hygiene, untreated
- injuries, injuries of differing ages, weight loss;
- inappropriate use of medication, overdosing or under dosing;
- inappropriate use of alcohol or drugs.

Domestic violence:

- low self-esteem;
- feeling that the abuse is their fault when it is not;
- physical evidence of violence such as bruising, cuts, broken bones;
- verbal abuse and humiliation in front of others;
- fear of outside intervention;
- damage to home or property;
- isolation – not seeing friends and family;
- limited access to money.

Modern slavery:

- signs of physical or emotional abuse;
- appearing to be malnourished, unkempt or withdrawn;
- isolation from the community, seeming under the control or influence of others;
- living in dirty, cramped or overcrowded accommodation and or living and working at the same address;
- lack of personal effects or identification documents;

- always wearing the same clothes;
- avoidance of eye contact, appearing frightened or hesitant to talk to strangers;
- fear of law enforcers.

Financial or material abuse:

- signatures on cheques, etc. that do not resemble the adult's signature, or which are signed when the adult cannot write;
- any sudden changes in bank accounts including unexplained withdrawals of large sums of money;
- students who have educational funding and/or grants to support their education but who have insufficient money for travel, food and necessities;
- the inclusion of additional names on an adult's bank account.
- abrupt changes to or creation of wills.
- the sudden appearance of previously uninvolved relatives claiming their rights to a person at risk's affairs or possessions.
- the unexplained sudden transfer of assets to a family member or someone outside the family;
- numerous unpaid bills, overdue accommodation payments, when someone is supposed to be paying the bills for the person at risk;
- unusual concern from someone that an excessive amount of money is being expended on the care of the person at risk;
- lack of amenities, such as study equipment, personal grooming items, appropriate clothing, that the person at risk should be able to afford;
- the unexplained disappearance of funds or valuable possessions such as art, mobiles, laptops or jewellery.
- deliberate isolation of a person at risk from friends and family resulting in the caregiver alone having total control.

Sexual abuse:

- A sexual act carried out without the informed consent of the other individual is abuse. Such behaviour includes contact and non-contact abuse.
- no one should enter into a sexual relationship with someone for whom they have professional responsibility within the University or hold a position of trust (this includes all staff).

- non-contact abuse may include sexual remarks and suggestions, introduction to indecent material, indecent exposure and harassment in the form of name calling, victimisation and ostracism, unwanted sexual attention, stalking,
- compromising invitations or gifts, the display of images that are racially or sexually offensive, the suggestion that sexual favours might further their educational or promotion prospects.
- contact abuse may include rape, indecent assault, being forced to touch another person, sexual intercourse or being pressurised into consenting to sexual acts or watching sexual materials/acts.

Neglect:

- denial of privacy or choice;
- denial of dignity;
- use of threats or fear or the power of the carer's or other adult's position to negate the person at risk's independent wishes. Such behaviour can create very real emotional or psychological stress; bullying, sexual and racial harassment;
- deprivation of social contact or deliberate isolation;
- making someone feel worthless;
- threats, verbal abuse, humiliation, blaming, controlling, pressurizing, coercion, fear or ignoring the person;
- public or unreasonable criticism;
- ignoring a person's wishes or point of view;
- setting unreasonable targets;
- removing areas of responsibility;
- undervaluing a person's efforts.

Self-neglect:

- very poor personal hygiene;
- unkempt appearance.
- lack of essential food, clothing or shelter;
- malnutrition and/or dehydration;
- living in squalid or unsanitary conditions;
- neglecting household maintenance; including hoarding;
- collecting a large number of animals in inappropriate conditions;

- non-compliance with health or care services;
- inability or unwillingness to take medication or treat illness or injury.

Psychological abuse:

- physical, mental and emotional development delay.
- admission of punishment which appears excessive.
- over-reaction to mistakes.
- continual self-deprecation;
- sudden speech disorders;
- fear of new situations;
- inappropriate emotional responses to painful situations;
- neurotic behaviour (rocking; hair twisting; thumb-sucking);
- self-mutilation;
- urinary or faecal incontinence.
- fear of parents/carers being contacted;
- difficulty in gaining access to the individual on their own.
- communication or phrases that sound like what the suspected perpetrator would say or language that is out of character or age inappropriate for the person.
- deference or submission to the suspected perpetrator.
- extremes of passivity or aggression.
- drug/solvent abuse/alcohol;
- running away;
- compulsive stealing, scavenging.

Organisational abuse:

- lack of flexibility and choice for people using care services;
- inadequate staffing levels;
- people being hungry or dehydrated;
- poor standards of care;
- lack of personal clothing and possessions and communal use of personal items;
- lack of adequate procedures;

- poor record-keeping and missing documents;
- absence of visitors;
- few social, recreational and educational activities;
- public discussion of personal matters;
- unnecessary exposure during bathing or using the toilet;
- absence of individual care plans;
- lack of management overview and support.

Discriminatory abuse:

- a person becomes overly concerned about gender, race, ethnicity, sexual preference, religion, age, health or disability of themselves or other people;
- a person starts to try to be like others;
- a person is forced to dress differently;
- the person appears withdrawn and isolated;
- expressions of anger, frustration, fear or anxiety;
- the support on offer does not take account of the person's individual needs in terms of a protected characteristic;

Appendix 2: Young People indicators of abuse appendix (Department for Education's statutory guidance, Keeping Children Safe in Education).

Abuse, including neglect, and safeguarding issues are rarely standalone events that can be covered by 1 definition or label. In most cases, multiple issues will overlap.

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

Emotional abuse is the persistent emotional maltreatment of a young person such as to cause severe and adverse effects on the young person's emotional development. Some level of emotional abuse is involved in all types of maltreatment of a young person, although it may occur alone.

Emotional abuse may involve:

Conveying to a young person that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person

Not giving the young person opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate

Age or developmentally inappropriate expectations being imposed on young people. These may include interactions that are beyond a young person's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the young person participating in normal social interaction

Seeing or hearing the ill-treatment of another

Serious bullying (including cyber-bullying), causing young people frequently to feel frightened or in danger, or the exploitation or corruption of young people

Sexual abuse involves forcing or enticing a young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the young person 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

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 young person 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 is the persistent failure to meet a young person's basic physical and/or psychological needs, likely to result in the serious impairment of the young person's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse.

Once a young person 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 young person from physical and emotional harm or danger

Ensure adequate supervision (including the use of inadequate care-givers)

Ensure access to appropriate medical care or treatment

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

Appendix 3: Specific safeguarding themes

Assessing adult-involved nude and semi-nude sharing incidents

This section is based on annex A of the UK Council of Internet Safety's advice for education settings.

All adult-involved nude and semi-nude image sharing incidents are young person sexual abuse offences and must immediately be referred to police/social care. However, as adult-involved incidents can present as young person-on-young person nude/semi-nude sharing, it may be difficult to initially assess adult involvement.

There are two types of common adult-involved incidents: sexually motivated incidents and financially motivated incidents.

Sexually motivated incidents

In this type of incident, an adult offender obtains nude and semi-nudes directly from a young person using online platforms.

To make initial contact, the offender may present as themselves or use a false identity on the platform, sometimes posing as a young person to encourage a response and build trust. The offender often grooms the young person on social media, in chatrooms or on gaming platforms, and may then move the conversation to a private messaging app or an end-to-end encrypted (E2EE) environment where a request for a nude or semi-nude is made. To encourage young person to create and share nude or semi-nude, the offender may share pornography or young person sexual abuse material (images of other young people), including AI-generated material.

Once a young person or young person shares a nude or semi-nude, an offender may blackmail the young person or young person into sending more images by threatening to release them online and/or send them to friends and family.

Potential signs of adult-involved grooming and coercion can include the young person being:

Contacted by an online account that they do not know but appears to be another young person.

Quickly engaged in sexually explicit communications, which may include the offender sharing unsolicited images.

Moved from a public to a private/E2EE platform.

Coerced/pressured into doing sexual things, including creating nudes and semi-nudes.

Offered something of value such as money or gaming credits.

Threatened or blackmailed into carrying out further sexual activity. This may follow the young person initially sharing the image or the offender sharing a digitally manipulated image of the young person to extort 'real' images.

Financially motivated incidents

Financially motivated sexual extortion (often known as 'sextortion') is an adult-involved incident in which an adult offender (or offenders) threatens to release nudes or semi-nudes of a young person unless they pay money or do something else to benefit them.

Unlike other adult-involved incidents, financially motivated sexual extortion is usually carried out by offenders working in sophisticated organised crime groups (OCGs) overseas and are only motivated by profit. Adults are usually targeted by these groups too.

Offenders will often use a false identity, sometimes posing as a young person, or hack another young person's account to make initial contact. To financially blackmail the young person, they may:

Groom or coerce the young person into sending nudes or semi-nudes and financially blackmail them.

Use images that have been stolen from the young person taken through hacking their account.

Use digitally manipulated images, including AI-generated images, of the young person.

The offender may demand payment or the use of the victim's bank account for the purposes of money laundering.

Potential signs of adult-involved financially motivated sexual extortion can include the young person being:

Contacted by an online account that they do not know but appears to be another young person. They may be contacted by a hacked account of a young person.

Quickly engaged in sexually explicit communications which may include the offender sharing an image first.

Moved from a public to a private/E2EE platform.

Pressured into taking nudes or semi-nudes.

Told they have been hacked and they have access to their images, personal information and contacts.

Blackmailed into sending money or sharing bank account details after sharing an image or the offender sharing hacked or digitally manipulated images of the young person.

Young people who are absent from education

A young person being absent from education, particularly repeatedly, can be a warning sign of a range of safeguarding issues. This might include abuse or neglect, such as sexual abuse or

exploitation or young person criminal exploitation, or issues such as mental health problems, substance abuse, radicalisation, FGM or forced marriage.

There are many circumstances where a young person may be absent or become missing from education, but some young people are particularly at risk. These include young people who:

- Are at risk of harm or neglect.
- Are at risk of forced marriage or FGM
- Come from Gypsy, Roma, or Traveller families
- Come from the families of service personnel
- Go missing or run away from home or care
- Are supervised by the youth justice system
- Cease to attend a College
- Come from new migrant families

We will follow our procedures for unauthorised absence and for dealing with young people who are absent from education, particularly on repeat occasions, to help identify the risk of abuse, exploitation and neglect, including sexual exploitation, and to help prevent the risks of going missing in future. This includes informing the local authority if a young person leaves the College without a new College being named and adhering to requirements with respect to sharing information with the local authority, when applicable, when removing a young person's name from the admission register at non-standard transition points.

Staff will be trained in signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns which may be related to being absent, such as travelling to conflict zones, FGM and forced marriage.

If a staff member suspects that a young person is suffering from harm or neglect, we will follow local young person protection procedures, including with respect to making reasonable enquiries. We will make an immediate referral to the local authority children's social care team, and the police, if the young person is suffering or likely to suffer from harm, or in immediate danger.

Child criminal exploitation

Child criminal exploitation (CCE) is a form of abuse where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a young person into criminal activity. It may involve an exchange for something the victim needs or wants, and/or for the financial or other advantage of the perpetrator or facilitator, and/or through violence or the threat of violence.

The abuse can be perpetrated by males or females, and young people or adults. It can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse.

The victim can be exploited even when the activity appears to be consensual. It does not always involve physical contact and can happen online. For example, young people may be forced to

work in cannabis factories, coerced into moving drugs or money across the country (county lines), forced to shoplift or pickpocket, or to threaten other young people.

Indicators of CCE can include a young person:

Appearing with unexplained gifts or new possessions

Associating with other young people involved in exploitation

Suffering from changes in emotional wellbeing

Misusing drugs and alcohol

Going missing for periods of time or regularly coming home late

Regularly missing College or education

Not taking part in education

If a member of staff suspects CCE, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the local authority's children's social care team and the police, if appropriate.

Child sexual exploitation

Child sexual exploitation (CSE) is a form of young person sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a young person into sexual activity. It may involve an exchange for something the victim needs or wants and/or for the financial advantage or increased status of the perpetrator or facilitator. It may, or may not, be accompanied by violence or threats of violence.

The abuse can be perpetrated by males or females, and young people or adults. It can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse.

The victim can be exploited even when the activity appears to be consensual. Young people who are being sexually exploited may not understand that they are being abused. They often trust their abuser and may be tricked into believing they are in a loving, consensual relationship.

CSE can include both physical contact (penetrative and non-penetrative acts) and non-contact sexual activity. It can also happen online. For example, young people may be persuaded or forced to share sexually explicit images of themselves, have sexual conversations by text, or take part in sexual activities using a webcam. CSE may also occur without the victim's immediate knowledge, for example through others copying videos or images.

In addition to the CCE indicators above, indicators of CSE can include a young person:

Having an older boyfriend or girlfriend

Suffering from sexually transmitted infections or becoming pregnant

If a member of staff suspects CSE, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the local authority's children's social care team and the police, if appropriate.

Child -on-child abuse

Child -on-child abuse is when young people abuse other young people. This type of abuse can take place inside and outside of College. It can also take place both face-to-face and online and can occur simultaneously between the 2.

The College has a zero-tolerance approach to sexual violence and sexual harassment. We recognise that even if there are there no reports, that doesn't mean that this kind of abuse isn't happening.

Child -on-child abuse is most likely to include, but may not be limited to:

Bullying (including cyber-bullying, prejudice-based and discriminatory bullying)

Abuse in intimate personal relationships between young people (this is sometimes known as 'teenage relationship abuse')

Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)

Sexual violence, such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence)

Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse

Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party

Consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery)

Upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm

Initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element)

Where young people abuse their peers online, this can take the form of, for example, abusive, harassing, and misogynistic messages; the non-consensual sharing of indecent images, especially around chat groups; and the sharing of abusive images and pornography, to those who don't want to receive such content.

If staff have any concerns about child -on-child abuse, or a young person makes a report to them, they will follow the procedures set out in section 7 of this policy, as appropriate. In particular, section 7.8 and 7.9 set out more detail about our College's approach to this type of abuse.

When considering instances of harmful sexual behaviour between young people, we will consider their ages and stages of development. We recognise that young people displaying

harmful sexual behaviour have often experienced their own abuse and trauma and will offer them appropriate support.

Domestic abuse

Young people can witness and be adversely affected by domestic abuse and/or violence at home where it occurs between family members. In some cases, a young person may blame themselves for the abuse or may have had to leave the family home as a result.

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse (abuse in intimate personal relationships between young people) and young person/adolescent to parent violence and abuse. It can be physical, sexual, financial, psychological or emotional. It can also include ill treatment that isn't physical, as well as witnessing the ill treatment of others. This can be particularly relevant, for example, in relation to the impact on young people of all forms of domestic abuse, including where they see, hear or experience its effects.

Anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socioeconomic status, sexuality or background, and domestic abuse can take place inside or outside of the home. Young people who witness domestic abuse are also victims.

Older young people may also experience and/or be the perpetrators of domestic abuse and/or violence in their own personal relationships. This can include sexual harassment.

Exposure to domestic abuse and/or violence can have a serious, long-lasting emotional and psychological impact on young people and affect their health, wellbeing, development and ability to learn.

If police are called to an incident of domestic abuse and any young people in the household have experienced the incident, the police will inform the key adult in College (usually the designated safeguarding lead) before the young person or young people arrive at College the following day. We are a member of Operation Encompass and have signed up to receive domestic abuse alerts from the police.

The DSL will provide support according to the young person's needs and update records about their circumstances.

Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a young person's welfare.

The DSL and/or the safeguarding team will be aware of contact details and referral routes into the local housing authority so they can raise/progress concerns at the earliest opportunity (where appropriate and in accordance with local procedures).

Where a young person has been harmed or is at risk of harm, the DSL will also make a referral to local authority children's social care.

So-called 'honour-based' abuse (including FGM and forced marriage)

So-called 'honour-based' abuse (HBA) encompasses incidents or crimes committed to protect or defend the honour of the family and/or community, including FGM, forced marriage, and practices such as breast ironing.

Abuse committed in this context often involves a wider network of family or community pressure and can include multiple perpetrators.

All forms of HBA are abuse and will be handled and escalated as such. All staff will be alert to the possibility of a young person being at risk of HBA or already having suffered it. If staff have a concern, they will speak to the DSL, who will activate local safeguarding procedures.

FGM

The DSL will make sure that staff have access to appropriate training to equip them to be alert to young people affected by FGM or at risk of FGM.

Section 7.3 of this policy sets out the procedures to be followed if a staff member discovers that an act of FGM appears to have been carried out or suspects that a student is at risk of FGM.

Indicators that FGM has already occurred include:

A student confiding in a professional that FGM has taken place.

A mother/family member disclosing that FGM has been carried out

A family/student already being known to social services in relation to other safeguarding issues.

A girl:

- Having difficulty walking, sitting or standing, or looking uncomfortable
- Finding it hard to sit still for long periods of time (where this was not a problem previously)
- Spending longer than normal in the bathroom or toilet due to difficulties urinating
- Having frequent urinary, menstrual or stomach problems
- Avoiding physical exercise or missing PE
- Being repeatedly absent from College, or absent for a prolonged period.
- Demonstrating increased emotional and psychological needs – for example, withdrawal or depression, or significant change in behaviour
- Being reluctant to undergo any medical examinations
- Asking for help, but not being explicit about the problem
- Talking about pain or discomfort between her legs

Potential signs that a student may be at risk of FGM include:

The girl's family having a history of practising FGM (this is the biggest risk factor to consider)

FGM being known to be practised in the girl's community or country of origin

A parent or family member expressing concern that FGM may be carried out.

A family not engaging with professionals (health, education or other) or already being known to social care in relation to other safeguarding issues

A girl:

- Having a mother, older sibling or cousin who has undergone FGM
- Having limited level of integration within UK society
- Confiding to a professional that she is to have a “special procedure” or to attend a special occasion to “become a woman”
- Talking about a long holiday to her country of origin or another country where the practice is prevalent, or parents/carers stating that they or a relative will take the girl out of the country for a prolonged period
- Requesting help from a teacher or another adult because she is aware or suspects that she is at immediate risk of FGM
- Talking about FGM in conversation – for example, a girl may tell other young people about it (although it is important to take into account the context of the discussion)
- Being unexpectedly absent from College

The above indicators and risk factors are not intended to be exhaustive.

Forced marriage

Forcing a person into marriage is a crime. 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.

It is also illegal to cause a young person under the age of 18 to marry, even if violence, threats or coercion are not involved.

Staff will receive training around forced marriage and the presenting indicators. We are aware of the ‘1 chance’ rule, i.e. we may only have 1 chance to speak to the potential victim and only 1 chance to save them.

If a member of staff suspects that a student is being forced into marriage, they will speak to the student about their concerns in a secure and private place. They will then report this to the DSL.

The DSL will:

Speak to the student about the concerns in a secure and private place.

Activate the local safeguarding procedures and refer the case to the local authority’s designated officer

Seek advice from the Forced Marriage Unit on 020 7008 0151 or fmu@fco.gov.uk

Refer the student to an education welfare officer, pastoral tutor, learning mentor, or College counsellor, as appropriate

Preventing radicalisation

Radicalisation refers to the process of a person legitimising support for, or use of, terrorist violence

Extremism is the promotion or advancement of an ideology based on violence, hatred or intolerance, that aims to**:**

- Negate or destroy the fundamental rights and freedoms of others; or
- Undermine, overturn or replace the UK's system of liberal parliamentary democracy and democratic rights; or
- Intentionally create a permissive environment for others to achieve the results outlined in either of the above points

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 of terrorism 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.

Colleges have a duty to prevent young people and vulnerable adults from becoming involved with or supporting terrorism. The DSL, or designated Prevent lead, will undertake in-depth Prevent awareness training, including on extremist and terrorist ideologies. They'll make sure that staff have access to appropriate training to equip them to identify young people/adults at risk.

We will assess the risk of young people in our College from becoming involved with or supporting terrorism. This assessment will be based on an understanding of the potential risk in our local area, in collaboration with our local safeguarding partners and local police force.

We will ensure that suitable internet filtering is in place and equip our students to stay safe online at College and at home.

There is no single way of identifying an individual who is likely to be susceptible to radicalization into terrorism. Radicalisation can occur quickly or over a long period.

Staff will be alert to changes in students' behaviour.

The government website Educate Against Hate and charity NSPCC say that signs that a student is being radicalised can include:

- Refusal to engage with, or becoming abusive to, peers who are different from themselves
- Becoming susceptible to conspiracy theories and feelings of persecution

- Changes in friendship groups and appearance
- Rejecting activities, they used to enjoy
- Converting to a new religion
- Isolating themselves from family and friends
- Talking as if from a scripted speech
- An unwillingness or inability to discuss their views
- A sudden disrespectful attitude towards others
- Increased levels of anger
- Increased secretiveness, especially around internet use
- Expressions of sympathy for extremist ideologies and groups, or justification of their actions
- Accessing extremist material online, including on Facebook or Twitter
- Possessing extremist literature
- Being in contact with extremist recruiters and joining, or seeking to join, extremist organisations

Young people who are at risk of radicalisation may have low self-esteem or be victims of bullying or discrimination. It is important to note that these signs can also be part of normal teenage behaviour – staff should have confidence in their instincts and seek advice if something feels wrong.

If staff are concerned about a student, they will follow our procedures set out in section 7.5 of this policy, including discussing their concerns with the DSL.

Staff should **always** take action if they are worried.

Further information on the College's measures to prevent radicalisation are set out in other College policies and procedures, including our online safety policy, and the prevent policy.

Sexual violence and sexual harassment between young people in Colleges

Sexual violence and sexual harassment can occur:

- Between 2 young people of any age and sex
- Through a group of young people sexually assaulting or sexually harassing a single young person or group of young people
- Online and face to face (both physically and verbally)
- Sexual violence and sexual harassment exist on a continuum and may overlap.

- Young people 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 and will be exacerbated if the alleged perpetrator(s) attends the same College.
- If a victim reports an incident, it is essential that staff make sure they are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting any form of abuse or neglect. Nor should a victim ever be made to feel ashamed for making a report.

When supporting victims, staff will:

- Reassure victims that the law on young person-on-young person abuse is there to protect them, not criminalise them
- Regularly review decisions and actions, and update policies with lessons learnt
- Look out for potential patterns of concerning, problematic or inappropriate behaviour, and decide on a course of action where we identify any patterns
- Consider if there are wider cultural issues within the College that enabled inappropriate behaviour to occur and whether revising policies and/or providing extra staff training could minimise the risk of it happening again
- Remain alert to the possible challenges of detecting signs that a young person has experienced sexual violence, and show sensitivity to their needs
- Some groups are potentially more at risk. Evidence shows that girls, young people with SEN and/or disabilities, and lesbian, gay, bisexual and transgender (LGBT) young people are at greater risk.

Staff should be aware of the importance of:

- Challenging inappropriate behaviours
- Making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up.
- Challenging physical behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them

If staff have any concerns about sexual violence or sexual harassment, or a young person makes a report to them, they will follow the procedures set out in section 7 of this policy, as appropriate. In particular, section 7.8 and 7.9 set out more detail about our College's approach to this type of abuse.

Serious violence

Indicators which may signal that a young person is at risk from, or involved with, serious violent crime may include:

- Increased absence from College

- Change in friendships or relationships with older individuals or groups
- Significant decline in performance
- Signs of self-harm or a significant change in wellbeing
- Signs of assault or unexplained injuries
- Unexplained gifts or new possessions (this could indicate that the young person has been approached by, or is involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation (see above))
- Risk factors which increase the likelihood of involvement in serious violence include:
- Being male
- Having been frequently absent or permanently excluded from College
- Having experienced young person maltreatment
- Having been involved in offending, such as theft or robbery

Staff will be aware of these indicators and risk factors. If a member of staff has a concern about a student being involved in, or at risk of, serious violence, they will report this to the DSL.

Checking the identity and suitability of visitors

All visitors will be required to verify their identity to the satisfaction of staff. There are clear signs up about how to report any concerns whilst on a visit to our College.

If the visitor is unknown to the setting, we will check their credentials and reason for visiting before allowing them to enter the setting. Visitors should be ready to produce identification.

Visitors are expected to sign the electronic sign in system and wear a visitor's badge with a red lanyard.

Visitors to the College who are visiting for a professional purpose, such as educational psychologists and social workers, will be asked to show photo ID and:

Will be asked to show their DBS certificate, which will be checked alongside their photo ID; or

The organisation sending the professional, such as the local authority or educational psychology service, will provide prior written confirmation that an appropriate level of DBS check has been carried out (if this is provided, we will not ask to see the DBS certificate).

All other visitors, including visiting speakers, will be required to undergo due diligence checks and will be accompanied by a member of staff at all times. We will not invite any speaker who is known to disseminate extremist views. We will carry out appropriate checks to ensure that any individual or organisation using College facilities is not seeking to disseminate extremist views or recruit students or staff into extremism or terrorism.

Missing students under 18.

Our procedures are designed to ensure that a missing young person is found and returned to effective supervision as soon as possible. We register our students for each lesson.

If a young person under18 goes missing off-site, we will:

- Conduct a search on the College site, check in with our pastoral/behaviour team and security warden.
- Our IT Manager and Mitie Service desk will check the CCTV cameras
- We will contact parents if we are unable to locate the student
- We will contact the police if we are unable to locate the missing student under 18

Appendix 4: Key contacts

Role/organisation	Name	Contact details
Designated safeguarding lead (DSL)	Jatinder Matharu Director of Safeguarding and Support	j-matharu@newbury-college.ac.uk 01635 5845286
Deputy DSL	Lee Hunt Deputy Principal (Vice Principal Further Education and Curriculum)	l-hunt@newbury-college.ac.uk 01635 845210
Deputy Designated Safeguarding Lead – staff related concerns (low level concerns and allegation management) (DDSL)	Vice Principal – Central Services	Cathy Wright c-wright@newbury-college.ac.uk 01635 845209
Safeguarding Officer (DDSL) Designated Teacher (DT) for Children in Care (CiC)	Shelbie Clucas - Safeguarding Officer	s-clucas@newbury-college.ac.uk 01635 845260 | **07789948533**

Role/organisation	Name	Contact details
DDSL's	Head of Department Foundation Learning – Leanne Butters Football Academy Representative(s): Jordan Pierce (offsite Provision) And Gary Clifford at Newbury College Site. Head of Behaviours and Attitudes – Steve Greenwood Kingsclere Performing Arts College (KCPC)	l-butters@newbury-college.ac.uk j.pierce@newbury-college.ac.uk g.clifford@newbury-college.ac.uk s-greenwood@newbury-college.ac.uk h-horton@newbury-college.ac.uk
Safeguarding Coordinator (DDSL)	Elly Aitkin - Safeguarding Coordinator	E-aitkin@newbury-college.ac.uk 01635 845260
Deputy Designated Safeguarding Lead – HE students (DDSL)	Head of Department Adults Beccy Monteith Head of Department UCN Stella McKnight	r-monteith@ucn.ac.uk s-mcknight@ucn.ac.uk
Onsite Safety Warden (site Security)	Mike Ainsbury	m-ainsbury@newbury-college.ac.uk
Health & Safety Manager -leading on site security	Carl Riva	c-riva@newbury-college.ac.uk

Role/organisation	Name	Contact details
Local authority designated officer (LADO)	The Local Authority Delegated Officer (LADO) - West Berkshire Council	LADO@westberks.gov.uk
Chair of Governors	Sally Osmond	S-osmond@newbury-college.ac.uk
Safeguarding governor	Chris Wilson	c-wilson4@newbury-college.ac.uk
Wellbeing Coordinator	Caroline Adshead	c-adshead@newbury-College.ac.uk
Prevent	Helene Morris – Southeast Prevent Lead	PreventGateway@thamesvalley.police.uk or 01865 555618 (Mon-Fri 0800 – 1600) https://act.campaign.gov.uk
Channel helpline		020 7340 7264
Berkshire West Safeguarding Young people Partnership (BWSCP) Procedures		Berkshire West Safeguarding Young people Partnership - scp http://berks.proceduresonline.com/
West Berkshire Young Person Service Contact, Advice and Assessment Service (CAAS)		About the Contact, Advice and Assessment Service (CAAS) - West Berkshire Council Office hours (between 8:30am and 5pm Monday to Thursday, and 8:30am to 4:30pm on Friday **01635 503090** |**child@westberks.gov.uk** If you have concerns outside of office hours, please contact the Emergency Duty Service on **01344 351 999**, where you will be able to discuss your concerns with a social worker.
West Berkshire Adult Safeguarding Services		safeguardingadults@westberks.gov.uk 01635 519056

Role/organisation	Name	Contact details
Senior Education Welfare Officer	Sally-Ann Looker	sal.looker@westberks.gov.uk 01635 519788

Appendix 5: Sources of Information and Support (adults)

Ann Craft Trust (ACT)

A national organisation providing information and advice about adult safeguarding. ACT have a specialist Safeguarding Adults including a Sport and Activity team to support the sector.

Tel: 0115 951 5400

Email: Ann-Craft-Trust@nottingham.ac.uk |www.anncrafttrust.org

Men's Advice Line

For male domestic abuse survivors |Tel: 0808 801 0327

National LGBT+ Domestic Abuse Helpline | Tel: 0800 999 5428

National 24Hour Freephone Domestic Abuse Helplines | Tel: 0808 2000 247
www.nationaldahelpline.org.uk/Contact-us

Rape Crisis Federation of England and Wales

Rape Crisis was launched in 1996 and exists to provide a range of facilities and resources to enable the continuance and development of Rape Crisis Groups throughout Wales and England.

Email: info@rapecrisis.co.uk | www.rapecrisis.co.uk

Respond

Respond provides a range of services to victims and perpetrators of sexual abuse who have learning disabilities, and training and support to those working with them.

Tel: 020 7383 0700 or 0808 808 0700 (Helpline)
Email: services@respond.org.uk | www.respond.org.uk

Stop Hate Crime

Works to challenge all forms of Hate Crime and discrimination, based on any aspect of an individual's identity. Stop Hate UK provides independent, confidential and accessible reporting and support for victims, witnesses and third parties.

24 hours service | Telephone: 0800 138 1625

Web Chat: www.stophateuk.org/talk-to-us/ |E mail: talk@stophateuk.org

Text: 07717 989 025 |Text relay: 18001 0800 138 1625

Suzy Lamplugh Trust

The Trust is a leading authority on personal safety. Its role is to minimise the damage caused to individuals and to society by aggression in all its forms – physical, verbal and psychological.

Tel: 020 83921839 | Email: info@suzylamplugh.org www.suzylamplugh.org

Victim Support

Provides practical advice and help, emotional support and reassurance to those who have suffered the effects of a crime.

Tel: 0808 168 9111 | www.victimsupport.com

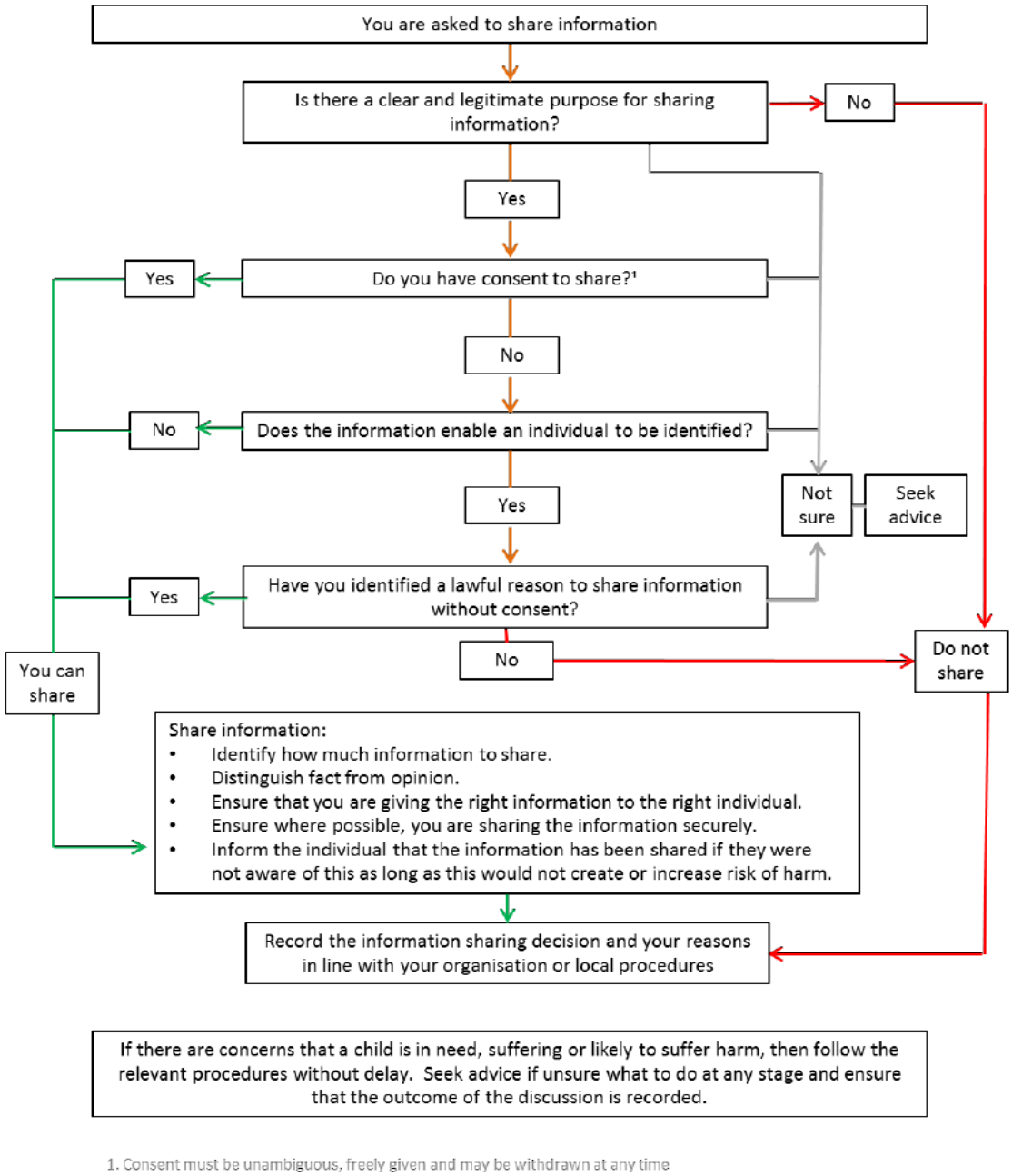
Women's Aid Federation of England and Wales

Women's Aid is a national domestic violence charity. It also runs a domestic violence online help service.

www.womensaid.org.uk/information-support

Appendix 6: Information Sharing Protocol for students under 18

Flowchart of when and how to share information



1. Consent must be unambiguous, freely given and may be withdrawn at any time

Reviewed: December 2024

Next review date due: December 2025