

To request a copy of this document in an alternative format such as large print, please contact 01922 657014.

1 PURPOSE

Walsall College is passionate about safeguarding our students. We believe that not only do we have a statutory duty to ensure that we safeguard and promote the welfare of children and young people in our care, but also a moral duty. This policy and procedure describe how we recruit and train our staff, support our students, make referrals and deal effectively with allegations against staff. It incorporates a wide range of risks we need to safeguard against, and to be clear in our response to the changing landscape of the safeguarding agenda.

- 1.2 Throughout this policy and procedure, reference is made to 'children and young people'. This term is used to mean those under the age of 18 years old. Safeguarding and promoting the welfare of children is defined as: protecting children from maltreatment; preventing impairment of children's mental health and physical health or development; ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and taking action to enable all children to have the best outcomes [Keeping Children Safe in Education September 2021](#).
- 1.3 This policy has been developed with support from Walsall Local Authority, Safeguarding Partnership and with reference to [Working Together to Safeguard Children \(July 2018\)](#) and [Keeping Children Safe in Education \(September 2021\)](#) and is shared with parents/carers on the College website www.walsallcollege.ac.uk.

2 GOVERNING BODY RESPONSIBILITIES

- 2.1 The Governing Body at Walsall College abide by their responsibilities as outlined in [Keeping Children Safe in Education September 2021](#). They must have regard to this guidance, ensuring that policies, procedures and training in the college is effective and complies with the law at all times. Governors also have specific responsibility for ensuring that the College monitors the impact of its work and learns lessons from Serious Case Reviews.
- 2.2 The Governing Body instructs the College to:
- 2.2.1 Facilitate a whole college approach to safeguarding; this means ensuring safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development;
- 2.2.2 Ensure there are procedures in place in order for appropriate action to be taken in a timely manner to safeguard and promote children's welfare. This includes having an effective child protection policy, a behaviour policy, a staff behaviour policy and appropriate safeguarding arrangements in place to respond to children who go missing from education, particularly on repeat occasions.

- 2.2.3 Ensure that child protection files are maintained as set out in Annex C of [Keeping Children Safe in Education 2021](#) and that appropriate safer recruitment policies in accordance with Part 3 of [Keeping Children Safe in Education 2021](#) are in place.
- 2.2.4 Ensure that systems are in place, that they are well promoted, easily understood and easily accessible for children to confidently report abuse, knowing their concerns will be treated seriously, and knowing they can safely express their views and give feedback.
- 2.2.5 Ensure an appropriate senior member of staff, from the college leadership team is appointed to the role of designated safeguarding lead, who will take lead responsibility for safeguarding and child protection (including on-line safety).
- 2.2.6 Ensure that the College contributes to multi-agency working in line with statutory guidance [Working Together to Safeguarding Children](#) and ensure that local arrangements are followed.
- 2.2.7 Ensure that the local criteria for action and the local protocol for assessment are reflected in policies and procedures and be prepared to supply information as requested by the safeguarding partners.
- 2.2.8 Recognise the importance of information sharing between practitioners and local agencies and include arrangements are in place that set out clearly the processes and principles for sharing information within the college and with partners, other organisations, agencies and practitioners as required.
- 2.2.9 Ensure that there is awareness of the [Data Protection Act 2018](#) and the [UK General Data Protection Regulation \(UK GDPR\)](#) that places duties on organisations and individuals to process personal information fairly and lawfully and to keep the information they hold safe and secure.
- 2.2.10 Ensure that relevant staff have due regard to the relevant data protection principles, which allow them to share and withhold personal information, as provided for in the [Data Protection Act 2018](#) and the [UK GDPR](#).
- 2.2.11 Ensure that all staff undergo safeguarding and child protection, including online safety training at induction, that it is regularly updated and in line with any advice from the safeguarding partners.
- 2.2.12 Ensure that as part of the requirement for staff to undergo regular updated safeguarding training, including on-line safety, that safeguarding training for staff, is integrated, aligned and considered as part of the whole college approach and wider staff training and curriculum planning.
- 2.2.13 Ensure that children are taught about safeguarding, including on-line safety and recognise that one size fits all approach may not be appropriate and that a more personalised or contextualised approach for more vulnerable children, victims of abuse and some SEND children might be needed.

- 2.2.14 Ensure that the College has appropriate filters and monitoring systems in place to ensure that children have a safe environment in which to learn.
- 2.2.15 Ensure that there are procedures in place to manage safeguarding concerns, or allegations against staff.
- 2.2.16 Ensure that the child protection policy includes procedures to minimise the risk of peer on peer abuse, systems in place and easily accessible to confidently report abuse, knowing concerns will be treated seriously, how allegations are recorded and investigated, how victims and perpetrators will be supported, recognition that even if there are no cases of peer on peer abuse such abuse may still be taking place and simply not being reported, that there is a clear zero-tolerance approach to abuse, that there are different forms of peer on peer abuse.
- 2.2.17 Listen to the voice of the child and always act in the best interests of the child.
- 2.2.18 Appoint a designated teacher for looked after children who will liaise with the relevant Local Authority and Virtual School Head to monitor progress of the Looked after Child.
- 2.2.19 Utilise the experiences and expertise of its staff when shaping safeguarding policies.
- 2.2.20 Ensure there are clear systems and processes in place for identifying possible mental health needs, including routes to escalate and clear referral and accountability systems.
- 2.3 The Governing Body will approve and annually review policies and procedures and receive regular information relating to safeguarding with the aim of:
- Maintaining awareness of progress across the College and/or issues relating to the welfare of children and young people;
 - Being reassured by the Principal and lead manager that systems are in place and effective in relation to the identification of children and young people at risk of harm and procedures for reporting concerns are widely known;
 - Ensuring effective procedures for reporting and dealing with allegations of abuse by members of staff or others who come into contact with students through College activity are in place including referral to Designated Officer at the Local Authority Designated Officer (LADO);
 - Ensuring safe recruitment of staff and volunteers;
 - Ensuring staff are appropriately trained to discharge their duties in relation to safeguarding;
 - Ensuring procedures are in place to make referral to the Disclosure and Barring Services (DBS) if a person in regulated activity has been dismissed or removed due to safeguarding concerns, or would have been if they had not resigned.
- 2.4 In developing policies and procedures, the Governing Body will take account of guidance issued by the Department for Education, the [Ofsted Education Inspection Framework \(EIF\) September 2019](#) and other relevant bodies and groups including Walsall Children's Safeguarding Partnership. Ofsted Inspectors will inspect the impact of safeguarding

arrangements and will be tested under the quality of leadership and management and report on whether or not safeguarding arrangements are effective.

- 2.4.1 The aim of the [Government's Prevent Strategy](#) is to reduce the threat to the UK from terrorism by stopping people becoming terrorists or supporting terrorism. This is part of an overall counter-terrorism strategy called CONTEST which is split into four work-streams that are known as the four "P's"- Prevent, Pursue, Protect and Prepare. In the [Counter-Terrorism and Security Act 2015](#) this has simply been expressed as "prevent people from being drawn into terrorism".
- 2.4.2 The [Government's Prevent Strategy](#) has three specific strategic objectives:
- Respond to the ideological challenge of terrorism and the threat we face from those who promote it;
 - Prevent people from being drawn into terrorism and ensure that they are given appropriate advice and support; and
 - Work with sectors and institutions where there are risks of radicalisation that we need to address.
- 2.4.3 The Government has defined extremism in the Prevent strategy as "vocal or active opposition to fundamental British Values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. We also include in our definition of extremism calls for the death of members of our armed forces".
- 2.4.4 The aim of this Child Protection and Safeguarding Policy is to ensure, as far as possible, that the College is fulfilling its duty in sections 26 and 29 of the [Counter-Terrorism and Security Act 2015](#). The College will participate fully in work to prevent people from being drawn into terrorism and will ensure that, should this occur, that procedures are implemented to deal with them.
- 2.4.5 The Principal, Governors and all staff working with children and young people at risk of harm will receive adequate training to familiarise themselves with their safeguarding roles and responsibilities. They will be familiar with College procedures and policies and receive refresher training at least every 2 years.
- 2.4.6 A senior member of the College Management Team will be the designated person with lead responsibility for child and adult protection. They will be the Designated Safeguarding Lead (DSL) who will undergo training, at least, every 2 years and in addition, keep up-to-date with safeguarding developments.
- 2.4.7 This person will also be the Single Point of Contact for preventing radicalisation (SPOC), the Head of Student Services. They are assisted by two Deputy Safeguarding Officers and the Safeguarding Team who support and share responsibility for safeguarding students.
- 2.4.8 The Governing Body will receive from the designated senior member of staff with lead responsibility for safeguarding, an annual report which reviews how the duties have been discharged. In addition, the Principal will include information relating to safeguarding in his termly report to Corporation.
The College recognises the following as definitions of abuse for children and young people at risk of harm.

3 INDICATORS OF ABUSE AND NEGLECT

- 3.1 All staff will be aware of the indicators of abuse and neglect and know what to look for when identifying abuse and neglect as well as other specific safeguarding issues such as child criminal exploitation and child sexual exploitation.
- 3.2 Staff are aware that abuse, neglect and safeguarding issues are rarely standalone events and cannot be covered by one definition or one label alone. In most cases multiple issues will overlap with one another and it is vital that staff are vigilant and always raise concerns with the designated safeguarding lead or deputy safeguarding officer.
- 3.3 All staff will be aware that safeguarding incidents and/or behaviours can be associated with factors outside the school or college and/or can occur between children outside of these environments. All staff, but especially the designated safeguarding lead (and deputies) will consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, sexual abuse, serious youth violence and county lines.
- 3.4 **Abuse:** a form of maltreatment of a child where somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. They may be abused by an adult or adults or another child or children.
- 3.5 **Physical abuse:** a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.
- 3.6 **Emotional abuse:** Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on their emotional development. It may involve conveying to them that they are worthless or unloved, inadequate, or valued only in so far as they meet the needs of another person. It may include not giving them opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond the child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyber bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, though it may occur alone.
- 3.7 **Sexual abuse:** involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing,

rubbing, and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue also known as peer on peer abuse.

- 3.8 **Neglect:** Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to a child's basic emotional needs.

4 SAFEGUARDING CONCERNS

- 4.1 All staff have an awareness of safeguarding concerns that can put children at risk of harm. This awareness is developed via mandatory safeguarding training and additional safeguarding training which is delivered either internally or externally. Behaviours linked to issues such as drug taking and/or alcohol misuse, deliberately missing education and consensual and non-consensual sharing of nudes and semi-nudes images and/or videos can be signs that children are at risk. Consensual image sharing, especially between older children of the same age, may require a different response, it might not be abuse, but children still need to know it is illegal, whilst non-consensual is illegal and abusive. [UKCIS Council for International Student Affairs](#) provides detailed advice about sharing of nudes and semi-nude images and videos.

There are other safeguarding concerns that staff are aware of and any such concerns are referred to the safeguarding team following the college safeguarding referral pathway – safeguardingteam@walsallcollege.ac.uk.

- 4.2 Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)
Both CSE and CCE are forms of abuse and both occur where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into taking part in sexual or criminal activity. This is usually in exchange for something the victim needs or wants and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. CSE and CCE can affect children, both male and female and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation.
- 4.3 Child Criminal Exploitation (CCE)
Some specific forms of CCE can include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories,

shoplifting or pickpocketing. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others.

4.3.1 Children and young people can become trapped by this type of exploitation as perpetrators can threaten victims (and their families) with violence, or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others. As children involved in criminal exploitation often commit crimes themselves, their vulnerability as victims is not always recognised by adults and professionals, (particularly older children), and they are not treated as victims despite the harm they have experienced. They may still have been criminally exploited even if the activity appears to be something they have agreed or consented to.

4.3.2 It is important to note that the experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however professionals should be aware that girls are at risk of criminal exploitation too. It is also important to note that both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

4.4 Child Sexual Exploitation (CSE)

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

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

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

4.5 So-Called Honour Based Abuse – including Female Genital Mutilation and Forced Marriage
So called “honour-based abuse (HBA) encompasses crimes which have been committed to protect or defend the honour of the family and/or the community including Female Genital Mutilation (FGM), forced marriage and practices, such as, breast ironing.

4.5.1 Abuse committed in the context of preserving “honour” often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take.

4.5.2 All forms of so-called HBA are abuse, regardless of motivation and should be handled and escalated as such and referred to the Safeguarding Team.

4.6 Female Genital Mutilation

This comprises all procedures that involve partial or total removal of the external female genitalia, or other injury to the female genital organs for non-medical reasons.

4.6.1 Since October 2015, there has been a specific, legal duty on staff to personally report to the police where they discover that FGM appears to have been carried out on a girl under 18. Those failing to report such cases will face disciplinary sanctions. Information on when and how to make a report can be found at: [Mandatory Reporting of FGM](#).

4.6.2 Guidance on the warning signs that FGM may be about to take place, or may have already taken place, can be found on pages 38-41 of the [Multi Agency Statutory guidance on FGM](#) (pages 59-61 focus on the role of schools and colleges).

4.6.3 Staff in the college are reminded of this duty and responsibility to report during safeguarding induction and refresher training.

4.7 Financial or Material Abuse

This relates to circumstances where trust in relation to financial matters is abused. Includes theft, fraud, exploitation, pressure in connection with wills, property or inheritance or financial transactions, or the misuse or misappropriation of property, possessions or benefits.

4.8 Mental Health

All staff are aware that mental health needs can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

4.8.1 College staff are well placed to observe their learners on a day-to-day basis and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.

4.8.2 Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children's experiences, can impact on their mental health, behaviour, and education.

4.8.3 The college works closely with [KOOOTH](#), an online mental health charity supporting young people, and also has a team of Mental Health First Aiders. Our counselling and safeguarding teams can access a range of advice to help them identify children in need of extra mental health support, this includes working with external agencies.

4.9 Peer on Peer Abuse

Staff are aware that children can abuse other children and that this is referred to as peer on peer abuse. It can take many forms and it can happen both inside and outside of college and online.

4.9.1 Staff are supported to recognise the indicators and signs of peer on peer abuse and know how to identify it and respond to concerns through the safeguarding referral process. Concerns can include but are not limited to:

- Bullying (including cyberbullying, prejudice-based and discriminatory bullying);
- Abuse in intimate personal relationships between peers;

- 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 nudes and semi nudes 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; and
- 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).

4.10 Serious Violence

All staff are aware of the indicators, which may signal that our learners are at risk from, or are involved with serious violent crime.

4.10.1 These may include increased absence from college, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation.

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

4.10.3 Advice for schools and colleges is provided in the documents [Serious Violence Strategy](#) by the Home Office and [Gangs and youth violence: for schools and colleges](#) – Home Office advice.

4.11 Children and the court system

Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed.

4.11.1 The guides explain each step of the process, support and special measures that are available. There are diagrams illustrating the courtroom structure and the use of video links is explained.

4.12 Children missing from education

All staff are aware that children going missing, particularly repeatedly, can act as a vital warning sign of a range of safeguarding possibilities. This may include abuse and neglect, which may include sexual abuse or exploitation and can also be a sign of child criminal exploitation including involvement in county lines.

4.12.1 It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation, risk of forced marriage. Early intervention is necessary to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child going missing in future.

4.12.2 Staff will be aware of the college's unauthorised absence and children missing from education procedures and this can be found in the Attendance and Punctuality Process and Policy.

4.13 Children with family members in prison

Approximately 200,000 children in England and Wales have a parent sent to prison each year. These children are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. [The National Information Centre on Children of Offenders, NICCO](#) provides information designed to support professionals working with offenders and their children, to help mitigate negative consequences for those children. Staff in the college have received awareness training to help them identify young people who may have a family member in prison and how to support them.

4.14 County Lines

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs using dedicated mobile phone lines or other form of "deal line". This activity can happen locally as well as across the UK - no specified distance of travel is required. Children and vulnerable adults are exploited to move, store and sell drugs and money.

4.14.1 Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children can be targeted and recruited into county lines in a number of locations including schools (mainstream and special), further and higher educational institutions, pupil referral units, children's homes and care homes.

4.14.2 Children are also increasingly being targeted and recruited online using social media. Children can easily become trapped by this type of exploitation as county lines gangs can manufacture drug debts which need to be worked off or threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

4.14.3 A number of the indicators for CSE and CCE may be applicable to where children are involved in county lines. Some additional specific indicators that may be present where a child is criminally exploited through involvement in county lines are children who:

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

4.14.4 Further information on the signs of a child’s involvement in county lines is available in guidance published by the Home Office.

4.15 Modern Slavery and the National Referral Mechanism

Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including: sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs.

4.15.1 Further information on the signs that someone may be a victim of modern slavery, the support available to victims and how to refer them to the [National Referral Mechanism NRM](#) is available in the [Modern Slavery Statutory Guidance. Modern slavery: how to identify and support victims.](#)

4.16 Cybercrime

Cybercrime is criminal activity committed using computers and/or the internet. It is broadly categorised as either ‘cyber-enabled’ (crimes that can happen off-line but are enabled at scale and at speed on-line) or ‘cyber dependent’ (crimes that can be committed only by using a computer).

4.16.1 Cyber-dependent crimes include;

- Unauthorised access to computers (illegal ‘hacking’), for example accessing the College’s computer network to look for test paper answers or change grades awarded;
- Denial of Service (Dos or DDoS) attacks or ‘booting’. These are attempts to make a computer, network or website unavailable by overwhelming it with internet traffic from multiple sources; and,
- Making, supplying or obtaining malware (malicious software) such as viruses, spyware, ransomware, botnets and Remote Access Trojans with the intent to commit further offence, including those above.

4.16.2 Children with particular skill and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime. If there are concerns about a child in this area, the designated safeguarding lead (or a deputy), will refer into the [Cyber Choices programme](#). This is a nationwide police programme supported by the Home Office and led by the [National Crime Agency](#), working with regional and local policing. It aims to intervene where young people are at risk of committing, or being drawn into, low level cyber-dependent offences and divert them to a more positive use of their skills and interests.

- 4.16.3 Cyber Choices does not currently cover ‘cyber-enabled’ crime such as fraud, purchasing of illegal drugs on-line and child sexual abuse and exploitation, nor other areas of concern such as on-line bullying or general on-line safety. Additional advice can be found at: [Cyber Choices](#), [‘NPCC- When to call the Police’](#) and [National Cyber Security Centre - NCSC.GOV.UK](#).
- 4.17 Domestic Abuse
[The Domestic Abuse Act 2021](#) received Royal Assent on 29th April 2021. The Act introduces the first ever statutory definition of domestic abuse and recognises the impact of domestic abuse on children, as victims in their own right, if they see, hear or experience the effects of domestic abuse.
- 4.17.1 The statutory definition of domestic abuse, based on the [previous cross-government definition](#) ensures that different types of relationships are captured, including ex-partners and family members.
- 4.17.2 The definition captures a range of different abusive behaviours including physical, emotional and economic abuse and coercive and controlling behaviour.
- 4.17.3 Both the person who is carrying out the behaviour and the person to whom the behaviour is directed towards must be aged 16 or over and they must be “personally connected” as defined in section 2 of the 2021 Act.
- 4.17.4 Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child/adolescent to parent violence and abuse.
- 4.17.5 Anyone can be a victim of domestic abuse, regardless of sexual identity, age, ethnicity, socioeconomic status, sexuality or background and domestic abuse can take place inside or outside of the home. The government will issue statutory guidance to provide further information for those working with domestic abuse victims and perpetrators, including the impact on children.
- 4.17.6 Young people can also experience domestic abuse within their own intimate relationships. This form of peer on peer abuse is sometimes referred to as ‘teenage relationship abuse’. Depending on the age of the young people, this may not be recognised in law under the statutory definition of ‘domestic abuse’ (if one or both parties are under 16).
- 4.17.7 However, as with any child under 18, where there are concerns about safety or welfare, child safeguarding procedures should be followed and both young victims and young perpetrators should be offered support. The Act’s provisions, including the new definition, will be commenced over the coming months
- 4.17.8 All children can witness and be adversely affected by domestic abuse in the content of their home life where domestic abuse occurs between family members. Exposure to domestic abuse and/or violence can have a serious long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

- 4.17.9 Controlling behavior is: a range of acts designed to make a person subordinate and/or dependent by isolating them from sources of support, exploiting their resources and capacities for personal gain, depriving them of the means needed for independence, resistance and escape and regulating their everyday behavior. Coercive behavior is: an act or a pattern of acts of assault, threats, humiliation and intimidation or other abuse that is used to harm, punish, or frighten their victim.”

Refuge runs the [National Domestic Abuse Helpline](#) which can be called free of charge and in confidence 24 hours a day on 0808 2000 247. The website provides guidance and support for potential victims. Additional advice on identifying children who are affected by Domestic Abuse and how they can be helped is available at:

[NSPCC – UK domestic-abuse Signs Symptoms Effects](#)
[Refuge what is domestic violence/effects of domestic violence on children](#)
[SafeLives: young people and domestic abuse”](#)
[Domestic abuse: specialist sources of support – GOV.UK](#)
[Home: Operation Encompass](#)

- 4.18 Homelessness
 Being homeless or being at risk of becoming homeless presents a real risk to a child’s welfare. The designated safeguarding lead (and any deputies) should be aware of contact details and referral routes into the Local Housing Authority so they can raise/progress concerns at the earliest opportunity. Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property.
- 4.18.1 Whilst referrals and/or discussion with the Local Housing Authority should be progressed as appropriate, and in accordance with local procedures, this does not, and should not, replace a referral into children’s social care where a child has been harmed or is at risk of harm.
- 4.18.2 [The Homelessness Reduction Act 2017](#) places a new legal duty on English councils so that everyone who is homeless or at risk of homelessness will have access to meaningful help including an assessment of their needs and circumstances, the development of a personalised housing plan, and work to help them retain their accommodation or find a new place to live.
- 4.18.3 The new duties shift focus to early intervention and encourage those at risk to seek support as soon as possible, before they are facing a homelessness crisis. In most cases school and College staff will be considering homelessness in the context of children who live with their families, and intervention will be on that basis. However, it should also be recognised in some cases 16- and 17-year olds could be living independently from their parents or guardians, for example through their exclusion from the family home, and will require a different level of intervention and support.
- 4.18.4 Children’s social care will be the lead agency for these children and the designated safeguarding lead (or a deputy) should ensure appropriate referrals are made based on the child’s circumstances.

Ref – Safeguarding Policy and Procedure (Child Protection)	Issue Date – October 2021
Page 13 of 41	Review Date – October 2022

4.19 Forced Marriage

Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage.

4.19.1 Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some perpetrators use perceived cultural practices as a way to coerce a person into marriage. [The Forced Marriage Unit](#) has published [statutory guidance and Multi-agency guidelines](#); pages 35-36 of which focus on the role of schools and colleges.

4.19.2 College staff can contact the [Forced Marriage Unit](#) if they need advice or information: Contact: 020 7008 0151 or email fmufco.gov.uk.

4.20 Bullying

The College has a separate policy and procedure for bullying and harassment. Bullying someone because of their age, race, gender, sexual orientation, disability and/or transgender will not be tolerated as the College operates a zero-tolerance approach. Bullying of this nature is also against the law. Bullying can take many forms and includes:

- **Emotional:** Being excluded, tormented (e.g. hiding things, threatening gestures).
- **Physical:** Pushing, kicking, punching or any use of aggression and intimidation.
- **Racial:** Racial taunts, use of racial symbols, graffiti, gestures.
- **Sexual:** Unwanted physical contact, sexually abusive comments including homophobic comments and graffiti.
- **Verbal:** Name calling, spreading rumours, teasing.
- **Cyber:** All areas on internet, such as email and internet, chat room misuse. Mobile threats by text message and calls. Misuse of associated technology i.e. camera and video facilities, sexting (YPSI).

4.20.1 Parents are informed at an early stage and involved in the process unless there is good reason to believe that involving parents would put the young person at risk of harm;

- At any point in the process if there is a concern a young person has been harmed or is at risk of harm a referral should be made, by the Safeguarding Team, to children's social care and/or the police immediately;
- In some cases, the incident can be handled internally without Police involvement.

4.20.2 Please see ["Sharing nudes and semi-nudes: advice for education settings working with children and young people"](#), for further information.

4.21 Radicalisation and Extremism

Children are vulnerable to extremist ideology and radicalisation. Similar to protecting children from other forms of harms and abuse, protecting children from this risk and is a part of College's safeguarding approach.

- **Extremism** is the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces.
- **Radicalisation** refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.
- **Terrorism** is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

4.21.1 Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups. Some young people may be vulnerable to radicalisation for the purpose of violent extremism.

4.21.2 Concerns regarding radicalisation will be referred to the Safeguarding Team who will liaise with the Multi Agency Safeguarding Hub (MASH) and/or the [Counter Terrorist Unit](#) (CTU) for advice. If appropriate, a referral will then be made to Channel which is a multi-agency panel who will offer guidance and support with the aim of preventing activity which could be deemed as criminal.

4.21.3 [The Counter Terrorism Unit \(CTU\)](#) will be advised of any emerging themes or immediate concerns/ disclosures. The department has published advice for colleges and the home office has developed 3 e-learning modules, [Prevent awareness e-learning](#), [Prevent referrals e-learning](#) and [channel awareness e-learning](#).

4.22 The Prevent Duty

The College is subject to a duty under section 26 of the [Counter-Terrorism and Security Act 2015 \(the CTSA 2015\)](#), in the exercise of their functions, to have “due regard to the need to prevent people from being drawn into terrorism”. This duty is known as the [Prevent Duty](#).

4.22.1 The Prevent Duty is seen as the Colleges’ wider safeguarding obligations. The Designated Safeguarding lead and other senior leaders in the College are familiar with the [revised Prevent Duty guidance: for England and Wales](#), especially paragraphs 57-76 which are specifically concerned with education provider. The guidance is set out in terms of four general themes: risk assessment, working in partnership, staff training, and IT policies.

4.22.2 There is advice for further education the [Education and Training Foundation \(ETF\)](#) hosts the Prevent for FE and Training. This hosts a range of free, sector specific resources to support further education settings comply with the Prevent duty. This includes the Prevent Awareness e-learning, which offers an introduction to the duty, and the Prevent Referral e-learning, which is designed to support staff to make robust, informed and proportionate referrals.

5 SEXUAL VIOLENCE AND SEXUAL HARASSMENT

- 5.1 [Sexual violence and sexual harassment](#) can occur between two children of any age and sex from primary to secondary stage and into Colleges. It can also occur online. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.
- 5.2 Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school or college.
- 5.3 Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and face to face (both physically and verbally) and are never acceptable. It is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe.
- 5.4 A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.
- 5.5 Staff should be aware that some groups are potentially more at risk. Evidence shows girls, children with special educational needs and disabilities (SEND) and LGBT children are at greater risk.
- 5.6 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;
 - Not tolerating or dismissing sexual violence or sexual harassment as “banter”, “part of growing up”, “just having a laugh” or “boys being boys”; and,
 - Challenging 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.
- 5.7 Peer on peer abuse will not be tolerated in the College and should never be defined as “banter, having a laugh or part of growing up”. Instances of Peer on peer abuse will be dealt with through the appropriate policies and procedures e.g. Positive Behaviour Management and Disciplinary Policy, Anti-Bullying and Child Protection and Safeguarding Policy.
- 5.8 [What is Sexual Violence](#)
College staff will be aware of sexual violence and that our learners can sometimes abuse their peers in this way. This can happen both inside and outside of college. When referring to sexual violence we are referring to sexual violence offences under the [Sexual Offences Act 2003](#) as described below:

- 5.8.1
- **Rape:** A person (A) commits an offence of rape if: he intentionally penetrates the vagina, anus or mouth of another person (B) with his penis, B does not consent to the penetration and A does not reasonably believe that B consents.
 - **Assault by Penetration:** A person (A) commits an offence if: s/he intentionally penetrates the vagina or anus of another person (B) with a part of her/his body or anything else, the penetration is sexual, B does not consent to the penetration and A does not reasonably believe that B consents.
 - **Sexual Assault:** A person (A) commits an offence of sexual assault if: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents. The College is aware that sexual assault covers a very wide range of behaviour so a single act of kissing someone without consent, or touching someone's bottom/breasts/genitalia without consent, can still constitute sexual assault.
 - **Causing someone to engage in sexual activity without consent:** A person (A) commits an offence if: s/he intentionally causes another person (B) to engage in an activity, the activity is sexual, B does not consent to engaging in the activity, and A does not reasonably believe that B consents. (This could include forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.)

5.9 What is consent?

Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another, e.g. to vaginal but not anal sex or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity and each time activity occurs. Someone consents to vaginal, anal or oral penetration only if s/he agrees by choice to that penetration and has the freedom and capacity to make that choice. A child under the age of 13 can never consent to any sexual activity; the age of consent is 16; sexual intercourse without consent is rape.

5.10 What is Sexual Harassment

When referring to sexual harassment we mean 'unwanted conduct of a sexual nature' that can occur online and offline and both inside and outside of college.

When we reference sexual harassment, we do so in the context of child on child sexual harassment. Sexual harassment is likely to violate a child's dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment.

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

- Sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names;
- Sexual "jokes" or taunting;
- Physical behaviour, such as: deliberately brushing against someone, interfering with someone's clothes (schools and colleges should be considering when any of this crosses a line into sexual violence - it is important to talk to and consider the experience of the victim) and displaying pictures, photos or drawings of a sexual nature; and

- Online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence.
- Consensual and non-consensual sharing of nudes and semi-nudes images and/or videos.

5.10.2 As set out in [Sharing nudes and semi-nudes: Advice for education settings working with children and young people](#) (which provides detailed advice for schools and colleges) taking and sharing nude photographs of U18s is a criminal offence:

- Sharing of unwanted explicit content;
- Upskirting (is a criminal offence);
- Sexualised online bullying;
- Unwanted sexual comments and messages, including, on social media;
- Sexual exploitation; coercion and threats.

5.11 What is Upskirting

[The Voyeurism \(Offences\) Act 2019](#) which is commonly known as the Upskirting Act, came into force on 12 April 2019. It is a criminal offence. Anyone of any sex, can be a victim

5.11.1 'Upskirting' is where someone takes a picture under a person's clothing (not necessarily a skirt) without their permission and or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm.

6 RESPONDING TO REPORTS OF SEXUAL VIOLENCE OR SEXUAL HARRASSMENT IN COLLEGE

The initial response to a report from a child is incredibly important. How the way the College responds to a report can encourage or undermine the confidence of future victims of sexual violence and sexual harassment to report or come forward.

- 6.1 The College recognises that not recognising, acknowledging or understanding the scale of harassment and abuse and/or downplaying of some behaviours can actually lead to a culture of unacceptable behaviour. It is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe.
- 6.2 A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.
- 6.3 If staff have a concern about a child or a child makes a report to them, they should make a referral to the College Safeguarding team via the safeguarding referral pathway or emailing – safeguardingteam@walsallcollege.ac.uk. As is always the case, if staff are in any doubt as to what to do they should speak to the designated safeguarding lead or the deputy leads.
- 6.4 Additional awareness training is offered to staff specifically focusing upon how to manage a disclosure of sexual harassment and sexual violence.

- 6.5 Alongside of training for staff, the College delivers awareness sessions and tutorials for students in relation to healthy relationships, consent and boundaries. The Sexual Health Nurse attends the college weekly and offers a drop-in session and supports the safeguarding team to raise awareness to students.
- 6.6 Managing allegations which are no further action, or repeat allegations that do not have police involvement.
In some cases, it may be become very clear that the police for whatever reason, do not take further action following an allegation. In such circumstances it is important that specialist support for both the victim and alleged perpetrator is put in place for as long as is necessary.
- 6.7 A risk assessment will support any decisions that are made. It is important to note that the fact an allegation cannot be substantiated or was withdrawn does not necessarily mean that it was unfounded.
- 6.8 Unsubstantiated, unfounded, false or malicious reports
For unsubstantiated, unfounded, false or malicious reports all decisions are recorded on the safeguarding casework system. This will enable the College to review these reports so that potential patterns of concerning, problematic or inappropriate behaviour can be identified and addressed.
- 6.9 In regards to repeat allegations involving any student, this will be immediately escalated by the safeguarding team to the local authority.
- 6.10 More information and advice on child on child sexual violence and harassment please see [Keeping Children Safe in Education 2021](#) Part Five and [Sexual Violence and sexual harassment between children in schools and colleges 2021](#).

7 ADDITIONAL SAFEGUARDING INFORMATION

7.1 Private Fostering

Private fostering is an arrangement made privately (without the involvement of a local authority) for the care of a child under the age of 16 (under 18, if disabled) by someone other than a parent or close relative with the intention that it should last for 28 days or more.

Private foster carers may be from the extended family, such as a cousin or great aunt. However, a person who is a relative under the [Children Act 1989](#) i.e. a grandparent, brother, sister, uncle or aunt (whether full or half blood or by marriage) or step-parent will not be a private foster carer.

A private foster carer may be a friend of the family, the parent of a friend of the child, or someone previously unknown to the child's family who is willing to privately foster a child. Local authorities have a duty to satisfy themselves that the welfare of children who are, or will be, privately fostered within their area is being, or will be, satisfactorily safeguarded and promoted.

If any staff member is aware of any student who may be privately fostered they will report this to the safeguarding team.

7.2 Children with special education needs and disabilities

Children with special educational needs and disabilities can face additional safeguarding challenges. Students within this cohort can be disproportionately impacted by things like bullying without showing any signs, they can also be more prone to peer group isolation than other children.

All staff are vigilant to ensure that they are mindful of signs of abuse which could include changes in behaviour, mood and/or injury and should be aware that there may be communication barriers which may make it more difficult for these students to share concerns and issues. It is important for staff to be aware that assumptions can be made about possible abuse, mood and injury and that this could relate to the child's disability without further exploration.

7.3 Children who need a social worker (Child in Need and Child Protection Plans)

Some children in the College will have support from the local authority and may have an allocated social worker. This will inform decisions about safeguarding (for example, responding to unauthorised absence or missing education where there are known safeguarding risks) and about promoting welfare. Member of the safeguarding team and also curriculum teams will attend both Child in Need and Child Protection meetings. Findings from the [Children in Need review: "Improving the educational outcomes of children in need of help and protection and Help, protection, education."](#)

7.4 Online Safety

The use of technology has become a significant component of many safeguarding issues. Child sexual exploitation; radicalisation; sexual predation: technology often provides the platform that facilitates harm.

An effective approach to online safety empowers the College to protect and educate the College community in their use of technology and establishes mechanisms to identify, intervene in and escalate any incident where appropriate. The breadth of issues classified within online safety is considerable, but can be categorised into three areas of risk:

- Content – being exposed to illegal, inappropriate or harmful material, such as, pornography, fake news, racist or radical and extremist views;
- Contact - being subjected to harmful online interaction with other users; for example, commercial advertising as well as adults posing as children or young adults;
- Conduct – personal online behaviour that increases the likelihood of, or causes, harm, such as, making, sending and receiving explicit images, or online bullying.

The College has put in place systems to limit exposure to the risks detailed above from the College's IT system. The College has appropriate filters and monitoring systems in place and there is a whole approach to online safety. This includes clear guidance on the use of mobile technology and particularly whilst more students are accessing their learning via a virtual platform on a more regular basis. Weekly reports about websites that have been accessed on the internet by students are sent to the safeguarding team so that any patterns can be identified and actions taken where appropriate. The College also has

trained CEOP members of staff who have undertaken training with the Child Exploitation and Online something!

Useful guidance and websites include “[Thinkunow the National Crime Agency/CEOPs education programme](#)”, “[UK Safer Internet Centre](#)” and “[On-line safety in schools and colleges UKCIS](#)”.

7.5 The use of [Reasonable Force](#)

There are circumstances when it is appropriate for our staff to use reasonable force to safeguard children and young people. The term ‘reasonable force’ covers the broad range of actions used by staff that involve a degree of physical contact to control or restrain children. This can range from guiding a child to safety by the arm, to more extreme circumstances such as breaking up a fight or where a young person needs to be restrained to prevent violence or injury. ‘Reasonable’ in these circumstances means ‘using no more force than is needed’. The use of force may involve either passive physical contact, such as standing between pupils or blocking a pupil’s path, or active physical contact such as leading a pupil by the arm out of the classroom.

When using reasonable force in response to risks presented by incidents involving children with SEN or disabilities or with medical conditions we will consider the risks carefully and recognise the additional vulnerability of these children.

7.6 Below are lists of links that will provide further, expert and up to date information from professional organisations.

- [Child Sexual Exploitation \(CSE\)](#)
- [Bullying including cyberbullying](#)
- [Child missing from Education](#)
- [Child missing from home or care](#)
- [Domestic abuse](#)
- [Drugs](#)
- [Educate Against Hate](#)
- [Effects of Domestic Violence on Children](#)
- [Fabricated or induced illness](#)
- [Faith abuse](#)
- [Female Genital Mutilation \(FGM\)](#)
- [Forced marriage](#)
- [Gangs and Youth Violence](#)
- [Gender-based violence/violence against women and girls \(VAWG\)](#)
- [Mental Health](#)
- [Missing Children and Adults Strategy](#)
- [National Information Centre on Children of Offenders](#)
- [Private Fostering](#)
- [Preventing radicalisation](#)
- [Relationship abuse](#)
- [Sexting \(YPSI\)](#)
- [Teaching Online Safety in School](#)

- [Trafficking](#)
- [Modern Slavery](#)

8 DESIGNATED STAFF WITH RESPONSIBILITY FOR PROTECTION FROM ABUSE

- 8.1 In all cases where allegations are made against people who may constitute part of the children's workforce, the College will consult with the [Local Authority Designated Officer \(LADO\)](#). They will offer advice regarding appropriate next steps in relation to referral and investigation and ensure that all cases are handled in accordance with safeguarding procedures. Designated staff will have on-going communications with the LADO as part of their safeguarding responsibilities to ensure that College policies and procedures are effective and meet the requirements of current legislation. Members of College staff are people who are in positions of trust (PoT) and therefore any behaviour which may call that position into question will be communicated to the College and acted on.
- 8.2 The senior member of staff with lead responsibility for safeguarding is the Head of Student Services based at Wisemore Campus, Littleton Street West, Walsall. They are a member of the College Senior Management Team and have a key duty to take lead responsibility for ensuring that staff are aware of issues relating to the welfare of children, young people and adults at risk of harm. This includes the promotion of a safe environment for children, young people and adults at risk of harm who are learning within the College or in the workplace. They have undertaken up to date training in child protection issues and inter-agency working, as required by the Walsall Children's Safeguarding Partnership, Walsall Adult Safeguarding Partnership and receive refresher training at least every two years. The Head of Student Services remains up to date with developments in child protection and adult safeguarding.

The designated senior member of staff is responsible for ensuring that:

- Cases of suspected abuse or allegations are appropriately referred to relevant agencies;
- Advice and support to staff on issues relating to safeguarding is provided;
- A record of any safeguarding referral, complaint or concern is kept, (even where that concern does not lead to a referral);
- Parents/carers/employers of children and young people within the College have access to the College's Safeguarding Policy;
- Liaison with employers and training organisations that receive children and young people from the College on long term placements to ensure that appropriate safeguards are put in place;
- Liaison with secondary schools which send pupils to the College to ensure that appropriate arrangements are made for the pupils;
- Staff receive basic training in safeguarding issues and are aware of the College safeguarding procedures including preventing people from being drawn into terrorism;
- Safer recruitment practices are in place;
- College works with appropriate partners to safeguard children;
- Where staff discover that an act of FGM has been carried out our mandatory duty to report to Police.

The designated senior member of staff will ensure an annual report is provided to the Governing Body of the College setting out how the College has discharged its duties. They are responsible for ensuring any deficiencies in procedure or policy identified by external partners is reported to the Governing Body at the earliest opportunity.

8.3 Designated Staff Members

Designated members of staff with responsibility for child protection issues are:

Business Support	
Andrea Packer	Designated Safeguarding Lead Single Point of Contact (SPOC)
Kit Rennie Selina Harra	Deputy Safeguarding Officers and Safeguarding and Welfare Officers
Melanie Jones	Counsellor - Safeguarding Officer
Lyndsey Shuker	Counsellor - Safeguarding Officer
Gemma Earp	Nursery Manager Safeguarding Officer - (Nursery Children only)
Claire Dunn	HR Specialist Allegations against staff only

These designated staff members collectively:

- Report to the senior member of staff with lead responsibility as appropriate;
- Make appropriate referrals;
- Liaise with other agencies in our partnership around children at risk of harm;
- Provide advice and support to other staff on issues relating to protection from abuse;
- Have particular responsibility to be available to listen to children, young people and adults at risk of harm studying at the College or in the workplace;
- Deal with individual cases, including attending case conferences and review meetings as appropriate;
- Undergo appropriate training as required by and receive refresher training at least every two years.

8.4 Designated Governor

Governors are briefed by the Designated Safeguarding Lead regarding yearly updates to policy and procedure and activity to maintain high standards in relation to safeguarding.

The Chair of Governors will take lead responsibility for overseeing any allegations made against the Principal and other Governors in relation to safeguarding matters. Where an allegation is made against the Chair of Governors, the Vice Chair will then take the lead. He is responsible for overseeing the liaison between the LADO, the Safeguarding Lead, Walsall Council, Social Services and/or the Police, in connection with such allegations. This will not involve undertaking any form of investigation, but will ensure good communication between the parties and provision of information to assist enquiries.

The lead Governor will have regular updates on safeguarding matters via the Principal's termly report to Corporation.

Ref – Safeguarding Policy and Procedure (Child Protection)	Issue Date – October 2021
Page 23 of 41	Review Date – October 2022

8.5 Data Protection and Information Sharing

Information sharing is vital in identifying and tackling all forms of abuse. It is important that we recognise the importance of information sharing between professionals and local agencies. The Safeguarding Team and members of staff have due regard to the relevant data protection principles which allow them to share personal information, as provided for in the [Data Protection Act 2018](#) and the [General Data Protection Regulation \(GDPR\)](#).

We have a duty to process personal information fairly and lawfully and to keep information held safe and secure. However, this is not a barrier to sharing information where failure to do so would result in a child being placed at risk of harm. The Data Protection Act 2018 and UK GDPR do not prevent the sharing of information for the purposes of keeping children safe. Fears about sharing information are not be allowed to stand in the way of the need to promote the welfare and protect the safety of children.

When students leave Walsall College, the Designated Safeguarding Lead and Deputy Safeguarding Leads will ensure their safeguarding file is transferred to the new school or College as soon as possible, (if applicable) ensuring secure transit, and confirmation of receipt.

When receiving file transfers, we ensure key staff are aware as required, e.g. curriculum staff, pastoral team and safeguarding team.

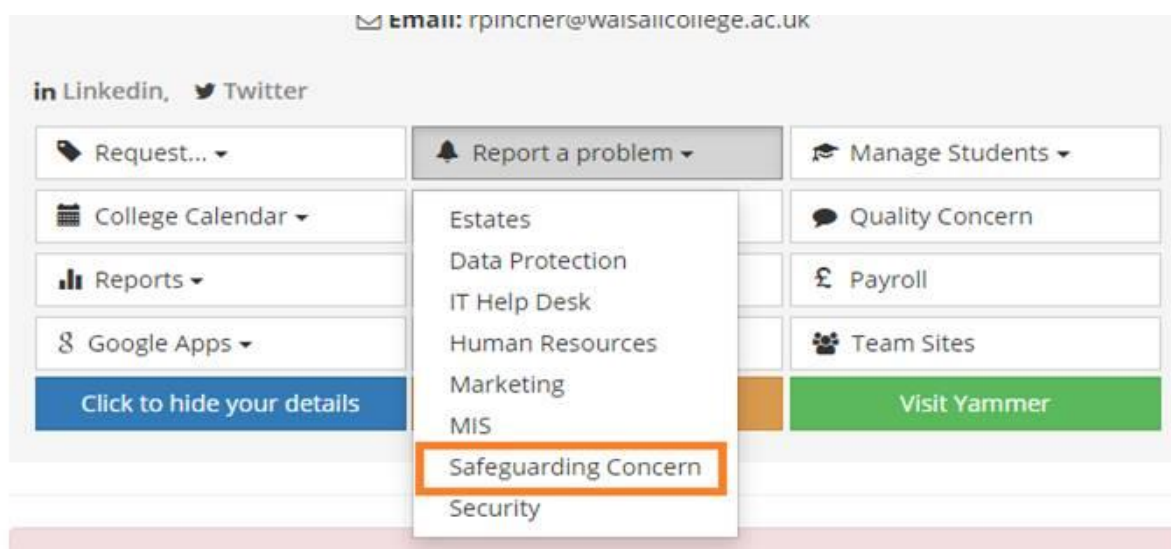
9 SAFEGUARDING PROCEDURE

9.1 What College staff should do if they have concerns about a child

9.1.1 All staff in the College are advised to maintain an attitude of “it could happen here” where safeguarding is concerned. They are also encouraged to remember that professional curiosity is not simply about asking the question, but about the language they use to create a trusting relationship and safe space in which to disclose.

9.1.2 When concerned about the welfare of a child, staff will always act in the best interests of the child. If staff have any concerns about a child they will act on them immediately and follow the college’s process for making a safeguarding referral using the safeguarding referral pathway. This referral pathway is accessed from the homepage – details below.

- open your homepage; (details below);
- select report a problem;
- select safeguarding concern;
- complete the safeguarding referral concern form that will open for you.



- 9.1.3 Members of staff are then directed to a referral form asking for the following information:
- student name;
 - student ID reference number;
 - Curriculum/course the student is studying on;
 - 3 safeguarding questions -
 - What are you specifically concerned about?
 - What are the specific risks for this student (for example if the student is not supported what could happen)
 - What interventions and support are currently in place for the student, prior to referring to safeguarding?
- 9.1.4 Once the information has been entered the form is submitted to the safeguarding email inbox and a safeguarding officer will action the referral. Options will include managing any support via the college's pastoral support process, undertaking an early help assessment or making a referral to statutory services, as the child might be in need, is in need or suffering or is likely to suffer harm.
- 9.1.5 Where a child is suffering, or is likely to suffer from harm it is important that a referral to children's social care and if appropriate the police is made immediately and the referral would follow local referrals process. It is important that the college provides as much information as possible as part of the referral process to allow any assessment to consider all the available evidence and enable a contextual approach to address such harm.
- 9.1.6 On occasion it may be necessary for a member of staff to report a safeguarding concern to external agencies outside of college hours. Additional information is available here: Contextual Safeguarding. The online tool [Report Child Abuse to Your Local Council](#) directs to the relevant local children's social care contact number.
- 9.1.7 Following a referral to the local authority they will acknowledge receipt of the referral within one working day and a decision as to the required response will be made. This will include:
- The child requires immediate protection and urgent action is required;
 - Any services are required by the child and family and what type of services;
 - The child is in need and should be assessed [under section 17 of the Children Act 1989](#);

- There is reasonable cause to suspect the child is suffering or likely to suffer significant harm, and whether enquiries must be made, and the child assessed [under section 47 of the Children Act 1989](#);
- Further specialist assessments are required to help the local authority to decide what further action to take.

9.2 How to handle a disclosure

9.2.1 All staff know what to do if a child tells them he/she is being abused, exploited or neglected. This section is covered in safeguarding induction and Level 1 safeguarding training. Staff will be aware how to manage the requirement to maintain an appropriate level of confidentiality. This means only involving those who need to be involved, such as the designated safeguarding lead (or a deputy) and children's social care. Staff should never promise a child that they will not tell anyone about a report of any form of abuse, as this may ultimately not be in the best interests of the child.

9.2.2 All staff should be able to reassure victims 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 abuse, sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

9.2.3 There are 5 stages to handle a disclosure:

- Receive the information;
- Reassurance;
- React;
- Record;
- Support;

9.2.4 After taking the disclosure go to the Staff Portal and select Report a Problem/Safeguarding Concern and complete the form with as much information as possible. Press submit and it will automatically be sent to the Safeguardingteam@walsallcollege.ac.uk email box.

9.3 Procedure for Students

9.3.1 Pre-16 Learners

Under 16-year olds on any School Link programme, formal taster event, or work experience within College. All participating schools must have signed the school/college contract which includes safeguarding practice, notification of vulnerability, travel arrangements, attendance monitoring/reporting and out of class supervision or workplace supervision as appropriate. All school link pupils must be enrolled/registered at the College and details of emergency contact recorded. For young people on a school link programme, the referral must go back to the Safeguarding Co-ordinator at the school they normally attend to discuss the referral and agree actions. Curriculum Delivery Manager for Achieving Together has details of School Liaison Co-ordinators and will pass on the disclosure to be actioned under their procedures

9.3.2 Students 16-17 years old

Where a student aged under 17 years old divulges information or staff become concerned that the young person is at risk of abuse, the member of staff must make a safeguarding referral outlined above using the online referral pathway form. Staff will advise the student that action may have to be taken as a result of the disclosure. It is not the responsibility of members of staff to investigate suspected abuse. Referral to the safeguarding team via safeguardingteam@walsallcollege.ac.uk will be made immediately. The student's wishes regarding action to be taken will be noted where possible. However, the student will be made aware that this will not affect the final decision to make a referral. There is no need to involve other members of staff (including line managers) as this may impact on the confidentiality of the concern.

The Student will be made aware of services within the College which may be able to help them address the situation and offer support i.e. Student Services provide information or local or national telephone helpline and counselling support. Where possible the Safeguarding Officer will consult the student regarding the report and their wishes and inform them of action which has or will be taken. However, depending upon the circumstance, this may not always be possible.

Where action is decided upon which necessitates contacting Children's Services, College procedures for referral will be followed within 24 hours of Safeguarding Team receiving the referral. Records will be kept of all discussions relating to protection from abuse matters and will be stored electronically in a confidential manner.

9.3.3 Apprentices

Workplace providers will receive a copy of the Safeguarding Policy and Procedure and information relating to their responsibility for safeguarding. Placement Officers/Assessors will carry out all health and safety risk assessments which includes a safeguarding discussion as part of workplace reviews with students. Apprentices will receive information relating to safe practice in the workplace and safeguarding contact details. When dealing with a disclosure, follow referral procedure for above for students aged 16 – 17 years old, or adult at risk of harm. Organisations seeking subcontracted work have to submit their policies and procedures as part of the PQQ process.

9.3.4 Under 18 Year olds in the College who are not enrolled as students

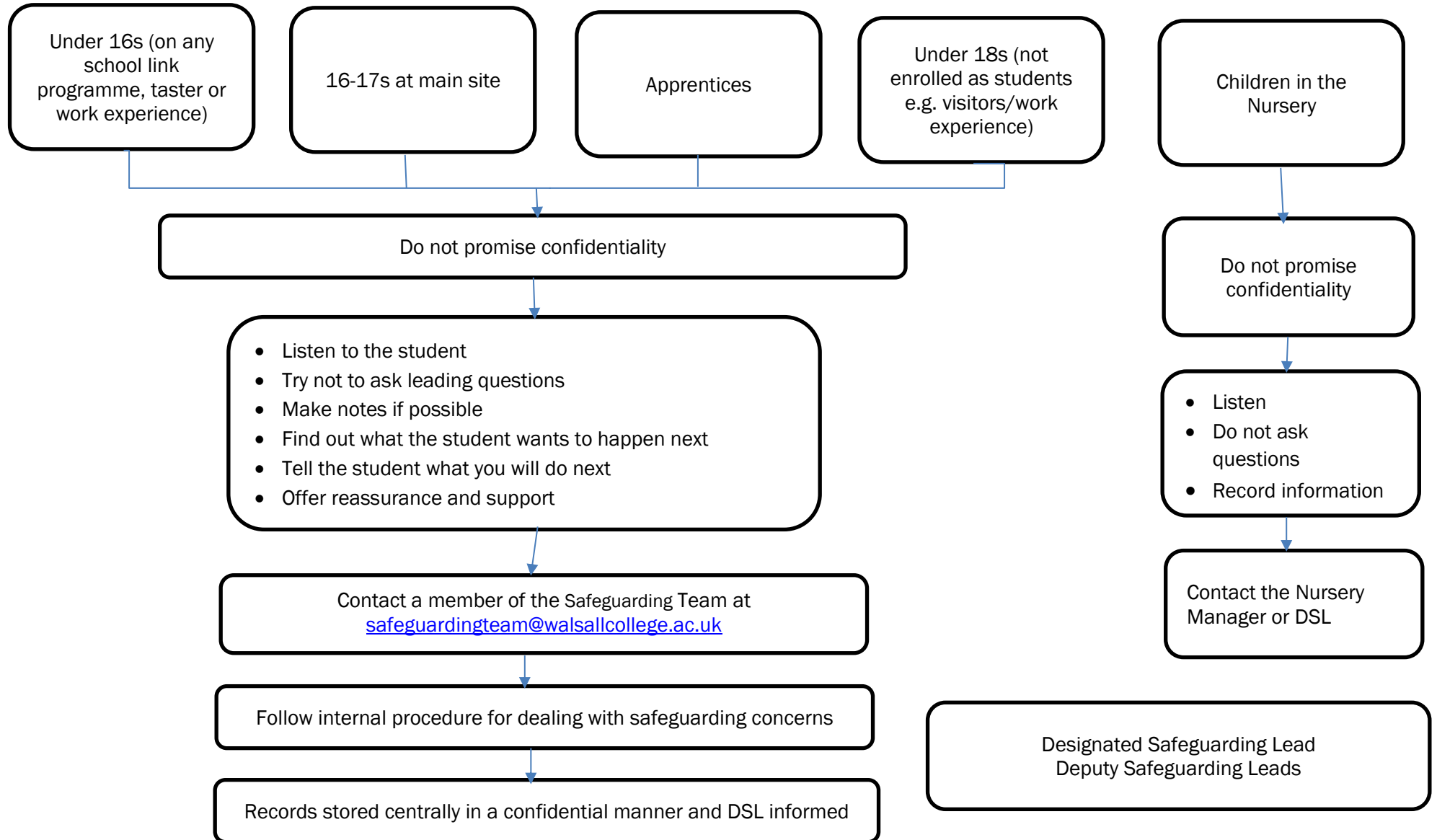
For young people who are not enrolled at the College, the referral must go back to the head of the organisation to which they are attached. The contact can be made direct or via the Designated Safeguarding Lead if they are on site. Where there is no organisational contact available, the referral will be made direct to Children's Services. A report of the disclosure and any action taken must be recorded and the Designated Safeguarding Lead informed.

9.3.5 Children in the Nursery

Report to the Nursery Manager, or in their absence a member of the Safeguarding Team. All referrals to meet Walsall Children's Safeguarding Partnership requirements and Early Years Ofsted expectations. A report of the disclosure and any action taken must be recorded and the Designated Safeguarding Lead informed.

Child Protection and Safeguarding Procedure Flowchart

'At a Glance' Guide



10 REPORTING AND DEALING WITH ALLEGATIONS OF ABUSE AGAINST MEMBERS OF STAFF

The procedures apply to all staff, whether teaching, administrative, management, support, supply and volunteers. Allegations of abuse against a member of staff can be defined as when a person has:

- Behaved in a way that has harmed a child, or may have harmed a child;
- Possibly committed a criminal offence against or related to a child;
- Behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children; or
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children.

There may be times where an individual's actions in their personal life come under scrutiny from the community, the media or public authorities, including with regard to their own children, or children or adults in the community. Staff should be aware that their behaviour, either in or out of the workplace, could compromise their position within the work setting in relation to the protection of children, loss of trust and confidence, or bringing the employer into disrepute. Such behaviour may also result in prohibition from teaching by the "[Teaching Regulations Agency \(TRA\)](#)" a bar from engaging in regulated activity or action by another relevant regulatory body.

10.1 Introduction

10.1.1 The College recognises that the [Children Act 1989](#) states that the welfare of the child is the paramount concern.

10.1.2 Staff of education institutions have been found responsible for child abuse. Because of their frequent contact with children and young people, staff may have allegations of child abuse made against them. Under the [Mental Capacity Act 2005 \(MCA\)](#) Section 44, it is an offence to harm or neglect an adult at risk of harm. The College recognises that an allegation of child abuse or abuse of adults at risk of harm made against a member of staff may be made for a variety of reasons and that the facts of the allegation may or may not be true. It is imperative that those dealing with an allegation maintain an open mind and those investigations are thorough and not subject to delay.

10.1.3 Hasty or ill-informed decisions in connection with a member of staff can irreparably damage an individual's reputation, confidence and career; therefore, those dealing with such allegations within the College will do so with sensitivity and will act in a careful, measured way, and with appropriate external support.

All staff are advised that they must report worries or concerns about other members of staff to Human Resources. Staff and volunteers should be able to raise concerns about poor or unsafe practice and potential failures in College safeguarding regime and that such concerns will be taken seriously by the senior leadership team. They can do this by contacting the Designated Safeguarding Lead, the Human Resources Team or by making a whistleblowing disclosure via the Clerk to the Corporation, Alison Clerk.

10.1.4 All staff are advised that they must report safeguarding concerns regarding a member of staff. The NSPCC whistleblowing helpline is available for staff who do not feel able to raise concerns regarding child protection failures internally. Staff can call: 0800 028 0285 – line is available from 8:00 a.m. to 8:00 p.m. Monday to Friday and Email: help@nspcc.org.uk or via their website [Whistleblowing advice line | NSPCC](https://www.gov.uk/whistleblowing). Alternatively, you can find information via the following link: <https://www.gov.uk/whistleblowing>.

10.2 **Receiving an Allegation from a Child or Adult at risk of harm about a Member of Staff**

10.2.1 A member of staff who receives an allegation about another member of staff from a child or adult at risk of harm will follow the information in the section for safeguarding procedures. This will ensure the child/adult needs are met. On some occasions, the concern may not arise from a direct disclosure. If observations of staff behaviour give rise for concern of inappropriateness these must be shared directly with Designated Safeguarding Lead or the Head of Human Resources.

10.2.2 The allegation about the staff member will be reported immediately to either the Designated Safeguarding Lead / Deputy Safeguarding Lead or the Head of Human Resources. In their absence, the report will go to a member of the Executive team who will follow the steps below.

10.2.3 They will contact the Local Authority Designated Officer (LADO) for children under 18 or the Adult Safeguarding Unit for adults at risk of harm to discuss referral and action where the criteria outlined in Section 2 Page 26 has been met. The Senior staff member will contact the LADO for advice and to discuss referral and any actions required. The LADO will be contacted within 1 working day of receiving the allegation. Appropriate internal action will be taken to safeguard the child/adult at risk of harm.

10.3 **Initial Assessment by the Principal (or designated person)**

The Principal (or Designated Person who may be a relevant senior member of staff) will make an initial assessment of the allegation, consulting where appropriate with the LADO, Senior Staff Member with Lead Responsibility or the Designated Governor as appropriate. Where the allegation is considered to be either a potential criminal act or indicates that the student has suffered, is suffering or is likely to suffer significant harm, the matter will be dealt with under Walsall's Safeguarding Children procedures, or in the case of adult abuse the Adult Safeguarding Unit (ASU).

10.3.1 In these circumstances it is important that the Principal or designated person does not investigate the allegation. The initial assessment will be on the basis of the information received and is a decision whether or not the allegation warrants further investigation.

10.3.2 Other potential outcomes are:

- The allegation represents inappropriate behaviour or poor practice by the member of staff and is neither potentially a crime nor a cause of significant harm to the child or adult at risk of harm. The matter will be addressed through professional development and mentoring, or where appropriate, the College's Disciplinary Policy and Procedure may be instigated.
- The allegation can be shown to be false because the facts alleged could not possibly be true, in which case the person concerned will be reassured and supported as appropriate.

10.4 **Enquiries and Investigations**

Child/Adult protection enquiries by Children's Social Care, Adult Services or the Police are not to be confused with internal, disciplinary enquiries by the College. The College may be able to use the outcome of external agency enquiries as part of its own procedures. Neither the Child Protection Agencies nor the Police have power to direct the College to act in a particular way; however, the College will always assist the agencies with their enquiries.

10.4.1 The College may hold in abeyance its internal enquiries while the formal Police or Children's Social Care or Adult Safeguarding investigations proceed; to do otherwise may prejudice the investigation. Any internal enquiries will conform to the existing Staff/Governor disciplinary procedures.

10.4.2 If there is an investigation by an external agency, for example the Police, the Principal (or designated person) will normally be involved in, and contribute to, the inter-agency strategy discussions. The Principal (or designated person) is responsible for ensuring that the College gives every assistance with the agency's enquiries. They will ensure that appropriate confidentiality is maintained in connection with the enquiries, in the interests of the member of staff about whom the allegation is made. The Principal (or designated person) shall advise the member of staff that he/she may consult with a recognised Trade Union representative or work companion.

- 10.4.3 Following discussion with the LADO, the ASU Manager, the Police or other investigating agency, the Principal (or designated person) shall:
- Ensure that the parents/carers of the child or vulnerable adult making the allegation have been informed that the allegation has been made and what the likely process will involve.
 - Inform the member of staff against whom the allegation was made of the fact that the allegation was made. Where investigation is taking place, they will be informed of what the likely process will involve and what support may be available.
- 10.4.4 Written records of the action taken in connection with the allegation will be kept.
- 10.5 **Suspension of Staff**
Suspension will not be automatic; a member of staff may be suspended on full pay whilst an investigation is undertaken. In respect of staff other than the Principal, suspension can only be carried out by the Principal, or a designated member of the Executive Team or Head of Human Resources. In respect of the Principal, suspension can only be carried out by the Chair of Governors (or in his/her absence, the Vice Chair).
- 10.5.1 Where a suspension is being considered Human Resources must be consulted. It is a neutral act, not a disciplinary sanction, and does not involve any prejudgement. Consideration will be given to alternatives where appropriate - e.g. paid leave of absence; agreement to refrain from attending work; change of, or withdrawal from, specified duties.
- 10.5.2 Suspension will only occur for a good reason, for example:
- Where there is a cause to suspect a child or adult is at risk of significant harm;
 - Where the allegations warrant investigation by the Police or potentially sufficiently serious to justify dismissal on the grounds of gross misconduct;
 - Where necessary for the good and efficient conduct of the investigation.
- 10.5.3 Where a member of staff is suspended they will be encouraged to seek advice and support, for example from a Trade Union.
- 10.5.4 If the Principal or Designated Person considers that suspension is necessary, the member of staff shall be informed that he/she is suspended from duty. Written confirmation of the suspension, with reasons, shall be despatched as soon as possible and ideally within five working days.

- 10.5.5 Where a member of staff is suspended, the Principal or Designated Person will address the following issues:
- Where the Principal has been suspended, the Chair or Vice Chair of Governors will need to act to address the management of the College.
 - The parents/carers of the child or adult making the allegation will be informed of the suspension. They will be asked to treat the information as confidential. Consideration will be given to informing the child or adult making the allegation of the suspension.
 - Consider whether the Marketing Department needs to liaise with the Children's or Adult Services Press Officer.
- 10.5.6 Senior staff that need to know of the reason for the suspension will be informed. Depending on the nature of the allegation, the Principal will consider and may involve the Chair of Governors whether a statement to the students of the College and/or parents/carers will be made, taking due regard of the need to avoid unwelcome publicity.
- 10.5.7 The Principal or Designated Person shall consider carefully and review the decisions as to who is informed of the suspension and investigation. The LADO and external investigating authorities will be consulted where required.
- 10.5.8 The suspended member of staff will be given appropriate support during the period of suspension. They will also be provided with information on progress and developments in the case at regular intervals with approval of LADO and the Police as appropriate.
- 10.5.9 The suspension will remain under review in accordance with the College disciplinary procedures.
- 10.5.10 Where suspension is instigated for something that could result in dismissal for misconduct which harmed a child or placed a child at risk, the College will refer them to the [Disclosure and Barring Service \(DBS\)](#). Referral to DBS also applies to action taken in relation to adults at risk of harm. Advice may be taken from other agencies prior to any action being taken.
- 10.5.11 Where an individual is dismissed for misconduct which harmed a child or placed a child at risk of harm; or resigns, retires, is made redundant or is transferred to a position which is not a child care position in such circumstances, Walsall College has a statutory duty to refer to the DBS.
- 10.5.12 If the person is subject to registration or regulation by a professional body or regulator, for example by the General Social Care Council, General Medical Council, Ofsted etc., the LADO will advise on whether a referral to that body is appropriate.
- 10.5.13 If it is decided that a member of staff who has been suspended from work can return, the College will facilitate their return to work and consider how the member of staff's contact with the child or children who made the allegation can be best managed.

Ref – Safeguarding Policy and Procedure (Child Protection)	Issue Date – October 2021
Page 33 of 41	Review Date – October 2022

10.6 Formal Internal Investigations

10.6.1 The member of staff will be informed of:

- The allegation against them;
- Their entitlement to be represented by a Trade Union representative or work companion during any investigation or subsequent formal action;
- The College's awareness of the personal impact the allegation may have and the support the College is able to offer e.g. counselling.

10.6.2 Where the member of staff has been suspended and no formal action is to be taken, the suspension will be lifted immediately and arrangements made for the member of staff to return to work.

10.6.3 The child, children or adult at risk of harm making the allegation and/or their parents/carers will be informed of the outcome of the investigation and proceedings. This will occur prior to the return to College of the member of staff (if suspended).

10.6.4 The Principal (or designated person) will consider what information will be made available to the general population of the College.

10.7 Record Keeping

10.7.1 Details of allegations following an investigation that are found to have been malicious or false (as defined in Keeping Children Safe in Education) should be removed from personnel records, unless the individual gives their consent for retention of the information. However, for all other allegations, it is important that the information is kept on the file of the person accused.

10.7.2 Schools and colleges have an obligation to preserve records which contain information about allegations of sexual abuse for the Independent Inquiry into Child Sexual Abuse (IICSA), for the term of the inquiry (further information can be found on the IICSA website). All other records should be retained at least until the accused has reached normal pension age or for a period of 10 years from the date of the allegation if that is longer.

10.8 Monitoring Effectiveness

10.8.1 Where an allegation has been made against a member of staff, the Head of Human Resources, together with the Senior Staff Member with Lead Responsibility will, at the conclusion of the investigation and any formal procedures, consider whether there are any matters arising from it that could lead to the improvement of the College's procedures and/or policies which will be drawn to the attention of the [Walsall Children's Safeguarding Partnership](#) and [Walsall Adult Safeguarding Partnership](#). Consideration will also be given to the training needs of staff. Any recommendations following a review will be reported to the designated Governor.

11 REPORTING AND DEALING WITH ALLEGATIONS AGAINST NON-MEMBERS OF STAFF

There are a number of instances where Walsall College students come into contact with people as part of College activity, who are not formally employed by the College e.g. Governors, Volunteers, placement providers, taxi/community transport personnel, staff of partner organisations or other service providers.

In the event of allegations regarding non-College employed persons as defined above, who come into contact with children on the College's behalf, the following procedure will be followed.

11.1 Governors

- 11.1.1 The person hearing the allegation will follow the Safeguarding Procedure: Section 1. for supporting the student.
- 11.1.2 They will immediately contact the Designated Safeguarding Lead or the Head of Human Resources who will take a written record of the allegation which is signed and dated.
- 11.1.3 The Chair of Governors, (or the Deputy Chair if the allegation is against him/her) and the Principal and the Clerk to the Corporation will be contacted and informed of the allegation.
- 11.1.4 The Chair of Governors, with the support of the Head of Human Resources and/or Designated Safeguarding Lead, will contact the LADO and discuss the allegation if it relates to a person under 18. If the allegation relates to an adult at risk of harm and the criteria met, Adult Safeguarding Unit will be contacted for advice.
- 11.1.5 If no action is required, the Clerk to the Corporation and the Chair of Governors will inform the person against whom the allegation has been made of the allegation and offer reassurance.
- 11.1.6 If it is decided that action is required, the Chair of Governors, and/or Designated Safeguarding Lead or Head of Human Resources will contact the appropriate agency (prior to making any contact with the Governor against whom the allegation has been made) e.g. Children's Social Services, Adult Safeguarding Unit or the Police, who will then begin their own processes.
- 11.1.7 If action has been required, the Clerk to the Corporation and the Chair of Governors will inform the person against whom the allegation has been made of the allegation and their suspension from duty pending external investigation. They will offer information about College processes and support.
- 11.1.8 Suspension and subsequent College action will follow the Governors' disciplinary procedure.

11.1.9 The Head of Human Resources or the Designated Safeguarding Lead will keep the Chair of Governors and the Principal informed of the progress and outcome of any investigation.

11.2 **Persons not employed by the College**

11.2.1 The responsibility to deal with any allegations against people who come into contact with our students on our behalf, but are employed by other organisations, rests with the host organisation.

11.2.2 Should an allegation be made, the person hearing the disclosure will follow the College procedure for supporting students (Safeguarding Procedures: Section 1.). They will report immediately to the Head of Human Resources who will contact the relevant referral agent and discuss action in relation to the student.

11.2.3 The Head of Human Resources will contact the employing company to advise them of the allegation and action taken. They will be advised that until the case is resolved the person against whom the allegation has been made must not continue with College activity and that it should activate its own procedures for such circumstances.

11.2.4 The company should contact the College at the conclusion of any investigation.

11.2.5 Where no legal action is taken discussion will take place regarding the individual's potential resumption of College activity.

11.3 **Volunteers**

11.3.1 Should an allegation be made about a volunteer, the person hearing the disclosure will follow the College Safeguarding Procedure for supporting students (Section 1).

11.3.2 The Head of Human Resources will be contacted immediately.

11.3.3 The Head of Human Resources will contact the LADO/Adult Safeguarding where the criteria have been met.

11.3.4 If action is deemed to be required the Head of Human Resources will make the referral to external agents and inform the relevant Senior Management Team member.

11.3.5 The Head of Human Resources will inform the volunteer of the allegation and suspend volunteering activity within the College pending investigation by the authorities.

11.3.6 If no action is required, the volunteer will be informed of the outcome, reminded of the College policy in relation to safeguarding, and allowed to return with appropriate support in place.

11.4 **Other Students**

Should an allegation be made against another student the person hearing the disclosure will follow the College Safeguarding Procedure for supporting students.

- 11.4.1 The Designated Safeguarding Lead and Curriculum Delivery Manager will assess immediate risk and take any necessary decision to suspend. The Designated Safeguarding Lead will seek advice from the appropriate external agents and make the referral if required. If no action is required, the College will follow its normal procedures following suspension of a student, including the activation of the Positive Behaviour Management and Disciplinary Policy & Procedure.
- 11.4.2 Where new activity is proposed which may affect the dynamics of the student cohort, e.g. additional recruitment of vulnerable 14-16's, safeguarding risk assessment is built into the risk assessment process.

GLOSSARY OF TERMS

Child: a young person under the age of 18 years

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

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

Please note: staff who work with and know the child may be requested to attend a Section 47 or a Section 17 meeting to provide information on the child on behalf of the College.

Early Help Assessment: Providing early help is more effective in promoting the welfare of children than reacting later. Early help means providing support as soon as a problem emerges, at any point in a child's life, from the foundation years through to the teenage years. Full Early Help guidance can be accessed via www.mywalsall.org

Local Authority Designated Officer - LADO: The Local Authority must appoint a Designated Officer (LADO) whose responsibility it is to be involved in the management and oversight of individual cases which fall within this procedure. They will provide advice and guidance to employers and voluntary organisations, liaising with the Police and other agencies, and monitoring the progress of cases to ensure that they are dealt with as quickly as possible, consistently, and with a thorough and fair process.

Designated Safeguarding Lead: each partner should have a Designated Safeguarding Lead (or, for health provider organisations, named professionals) for safeguarding. Their role is to support other professionals in their agencies to recognise the needs of children, including rescue from possible abuse or neglect. Designated safeguarding roles should always be explicitly defined in job descriptions. Professionals should be given sufficient time, funding, supervision and support to fulfil their child welfare and safeguarding responsibilities effectively and undergo training to provide them with the knowledge and skills required to carry out their role. They should liaise with staff on matters of safety and safeguarding.

Significant Harm: The Children Act 1989 introduced Significant Harm as the threshold that justifies compulsory intervention in family life in the best interests of children.

Significant Harm is any Physical, Sexual, or Emotional Abuse, Neglect, accident or injury that is sufficiently serious to adversely affect progress and enjoyment of life.

Ref – Safeguarding Policy	Issue Date – October 2021
Page 38 of 41	Review Date – October 2022

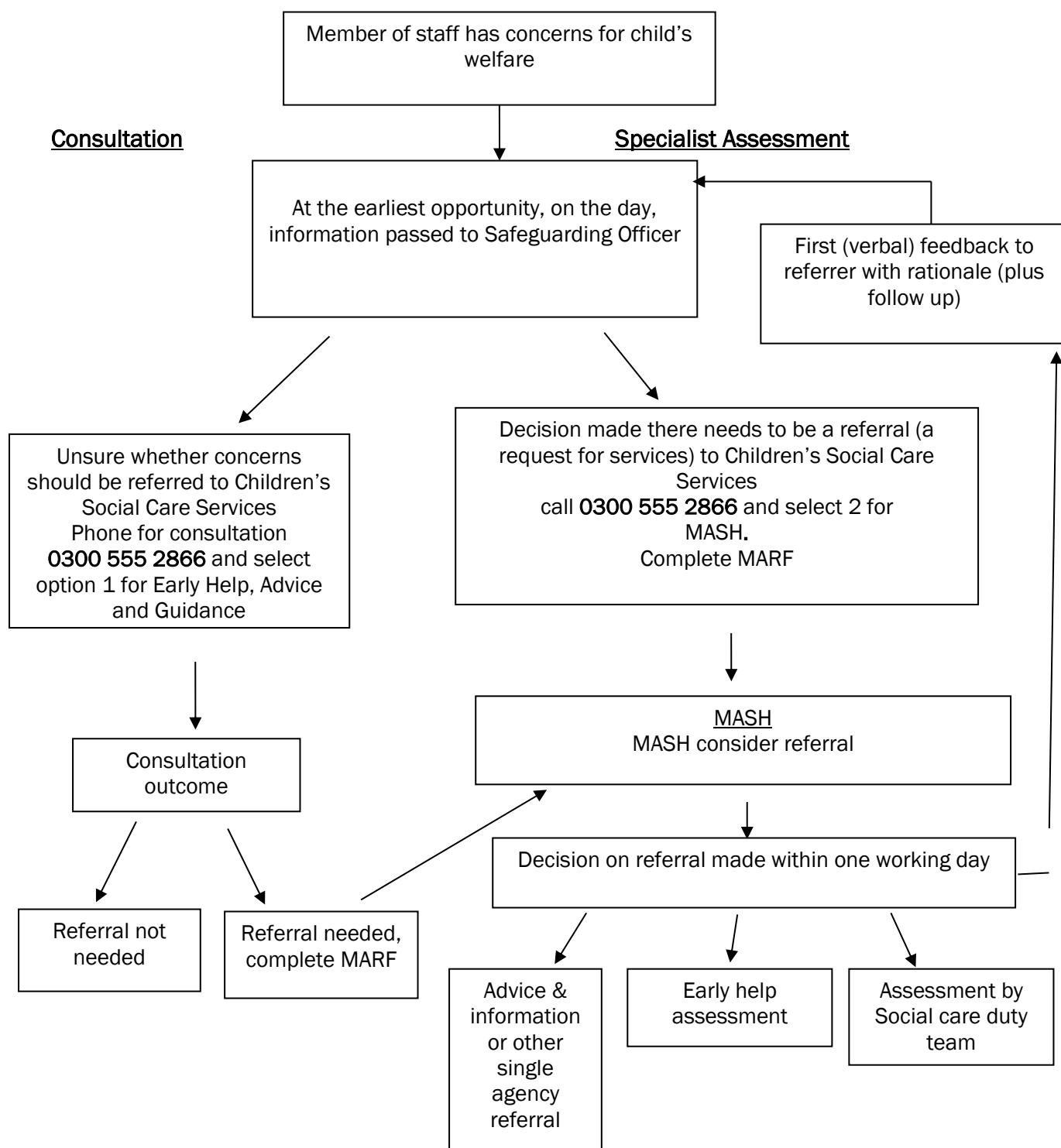
Harm is defined as the ill treatment or impairment of health and development. This definition was clarified in section 120 of the Adoption and Children Act. Suspicions or allegations that a child is suffering or likely to suffer Significant Harm may result in a Core Assessment incorporating a Section 47 Enquiry.

There are no absolute criteria on which to rely when judging what constitutes significant harm. Sometimes a single violent episode may constitute significant harm but more often it is an accumulation of significant events, both acute and longstanding, which interrupt, damage or change the child's development.

Walsall Safeguarding Children Partnership – Revisions to “Working Together to Safeguard Children” have been made to reflect the legislative changes introduced through the “Children and Social Work Act 2017”. This act replaces Local Safeguarding Children Boards with new, local safeguarding arrangements led by three safeguarding partners (local authorities, chief officers of police and clinical commissioning groups). The Act places a duty on those partners to decide for themselves and relevant agencies they deem appropriate, to work together for the purpose of safeguarding and promoting the welfare of children in their area.

Ref – Safeguarding Policy	Issue Date – October 2021
Page 39 of 41	Review Date – October 2022

Early Help Hub and Multi-Agency Safeguarding Hub (MASH) in Walsall – outside of college hours



All staff should be aware of the process for making referrals to children's social care and for statutory assessments under the Children Act 1989, especially section 17 (children in need) and section 47 (a child suffering, or likely to suffer, significant harm) that may follow a referral. Please contact MASH if you are unable to speak to a member of the Safeguarding Team.

Ref – Safeguarding Policy	Issue Date – October 2021
Page 40 of 41	Review Date – October 2022

Managing Allegations against Staff and Volunteers

