



Child Protection and Adults at Risk Safeguarding Policy

Policy and Procedure

Bringing talent to life...

DEPARTMENT	STUDENT SERVICES
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VERSION	1



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Summary of Changes (Highlighted and Hyperlinked)

Section/Page	Description	Rationale
2.14 Page 7	Added in further information regarding care experienced	In line with new ways of working
2.15 Page 7	Including kinship care arrangements into care experienced	In line with KCSIE (2025) updates
3.2 Page 11	Additional responsibility	In line with KCSIE (2025) updates
3.5 Page 11	Our contribution to local safeguarding arrangements	Demonstrating how we keep informed of emerging risks
3.12 Page 12	Include the word voice	Family first language
3.50 – 3.60 Pages 18 – 20	Online Safety Section	In line with KCSIE (2025) updates
3.61 Page 20	Includes a wider definition	In line with KCSIE (2025) updates
3.64-3.67 Pages 20 – 21	Rewritten a section and linked key guidance	In line with KCSIE (2025) updates
3.158 Page 34	Added contact details and a screening tool	Reference point
3.194 – 3.209 Page 41 – 44	Online section in regards to our statutory duties with child-on-child sexual violence and harassment	In line with KCSIE (2025) updates
4.10 Page 51	Referencing Families First	In line with new ways of working
4.17 Page 52	Including new harm indicators and kinship care	In line with KCSIE (2025) updates
4.50 – 4.60 Pages 57 – 58	Walsall Families First pathway	In line with new ways of working

1. Purpose

- 1.1 Walsall College is committed to ensuring that all our students should live free from harm of abuse, exploitation, and neglect. We believe that every student is deserving of an environment that is supportive, caring, and nurturing for them to be able to flourish and thrive. This is for all our students, whether they are a child or an adult.
- 1.2 This policy focuses on how to recognise the various forms of harm, referring to national and regional guidance (that is both statutory and non-statutory), what to do if you have a concern, how to make a referral to the Safeguarding and Wellbeing Team, signposting to other policies and procedures with how we recruit and train our staff, how we support our students, and how we deal effectively with allegations against staff.
- 1.3 Throughout this policy and procedure, reference is made to 'child', 'children', 'children and young people', this term is used to mean those under the age of 18 years old. The legal definition of a child is anyone under 18 years of age.
- 1.4 If we are using 'adult', this term is used for any of our students over the age of 18 years of age. We use the term students, for all our students, whether they are a child or adult, the procedure will be applied, with appropriate adaptations to all students.
- 1.5 Walsall College is dedicated to safeguarding and promoting the welfare of all students. In the context of children this is defined as protecting children from maltreatment, preventing impairment of children's health or development, ensuring that children grow up in circumstances consistent with the provision of safe and effective care and acting when these parameters are not in place.
- 1.6 Safeguarding in the context of adults at risk is defined as people aged 18 years old and over who may need or receive community care services by reason of mental health or other disability, age or illness and who may be unable to take care of themselves or protect themselves against significant harm. The procedure will be applied, with appropriate adaptations to all students.

2. Responsibility

Governing Body Responsibilities

- 2.1 The Governing Body at Walsall College abide by their responsibilities as outlined in [Keeping Children Safe in Education 2025 \(KSCIE\)](#). Our governors 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 Safeguarding Practice Reviews.

2.2 The Governing Body instructs the College to:

- Provide a safe environment for all students to learn in
- Ensure there are procedures in place to manage safeguarding concerns, or allegations against staff (including supply staff and volunteers) that might indicate they would pose a risk of harm to children or adults
- Identify those who are suffering, or are likely to suffer significant harm or who are at risk of radicalisation
- Take appropriate action to see that students and children in the Nursery are kept safe at the College, and that disclosures of potential abuse occurring at home, online or elsewhere are reported appropriately
- Refer concerns that a child or adult at risk of significant harm to the appropriate referral agents
- Work effectively with others as required by [Working Together to Safeguard Children \(July 2023\)](#) and in line with the guidance [NPCC When to call the police.](#)
- Listen to the voice of students and advocate for them when appropriate
- A Designated Teacher to coordinate our responsibilities for our Care Experienced cohort, who will advocate and liaise with the relevant Local Authority and Virtual College Head to monitor their progress
- Ensure appropriate safeguarding responses for children who go missing from college particularly on repeat occasions, to help identify the risk of abuse, neglect, and exploitation, to prevent the risk of them going missing in future
- Ensure there is an effective Child Protection and Adults at Risk Safeguarding Policy in place together, aligned with a Staff Code of Conduct which include staff/student relationships, including the use of social media
- Utilise the experiences and expertise of its staff when shaping safeguarding policy
- Ensure that students are taught about safeguarding (including online safety) as part of a broad and balanced Personal Development Curriculum
- Ensure there are clear systems and processes in place for identifying possible mental health problems, including routes to escalate, with clear referral pathways 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 adults
- Being reassured by the Designated Safeguarding Lead (DSL) that systems are in place and effective in relation to the identification of children and adults at risk of harm and procedures for reporting concerns are widely known
- Confirming effective procedures for reporting and dealing with allegations of abuse by members of staff, or others, who encounter students through college activity are in place including referral to Local Authority Designated Officer (LADO)

- Ensure the safe recruitment of all staff and volunteers, who engage with our students, as in line with our Safer Recruitment Policy and Procedure
- Provide training to all staff that discharge their duties in relation to safeguarding
- Ensuring that procedures 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 The Governing Body will receive from the DSL an annual report which reviews how the duties have been discharged. In addition, the DSL will include provide a safeguarding update termly to Corporation.
- 2.5 The Principal, Governors, DSL, and all staff working with children and adults at risk of harm will receive adequate training to familiarise them with their safeguarding roles and responsibilities.
- 2.6 All staff will be familiar with college procedures, policies, and receive annual refresher training. As well as contextualised safeguarding updates through team meetings and our all-managers communication forum.
- 2.7 All new staff receive onboarding training, which features safeguarding updates, as well as how to report concerns, and what could be considered a concern.

DSL Responsibilities

- 2.8 Walsall College has appointed Charlotte Wood as our College's DSL as they are the appropriate senior member of staff, with the authority to perform the role and form part of the college's leadership team. This person is the Single Point of Contact for preventing radicalisation (SPOC). The DSL takes lead responsibility for safeguarding, child protection, adults at risk, and online safety.
- 2.9 The DSL or a Deputy Designated Safeguarding Lead (DDSL) will always be available to discuss safeguarding concerns during the hours of 8:30AM – 5PM. If in exceptional circumstances, the designated safeguarding lead (or deputy) is not available, this should not delay appropriate action being taken. You should consider speaking to a member of the Senior Management Team or member of the Safeguarding and Wellbeing Team. In these circumstances, any action taken should be shared with the DSL or DDSL as soon as is practically possible.
- 2.10 The DSL and DDSLs have responsibilities are as follows:
- Refer cases of suspected abuse, exploitation, and neglect to the local authority Children's and Adult Services as required
 - Support Safeguarding and Wellbeing Team who make referrals to local authority Children and Adult Services

- Refer cases to the Channel programme, where there is a radicalisation concern as required and support staff who make referrals to the Channel programme
- DSL to consult with Head of HR and refer cases where a person is dismissed or has left due to risk or harm towards a child or adult to the Disclosure and Barring Service as required
- Refer cases where a crime may have been committed to the Police as required
- Liaise with all staff on matters of safety and safeguarding (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies
- Act as a source of support, advice and expertise for all staff
- Be aware of students who have a social worker and support them appropriately
- Help promote educational outcomes by sharing the information about the welfare, safeguarding, child protection, and adults at risk issues with teachers and college leadership staff
- Identify and assign roles and responsibilities to manage filtering and monitoring
- Oversee and monitor all aspects of online filtering and monitoring systems and act on issues identified or raised
- Meet the DFE [filtering and monitoring technical standards](#)
- Work in partnership with the Head of IT to embed the guidance of [Cyber security standards for colleges and colleges.GOV.UK](#). including undertaking Cyber security training for all staff, including governors [Cyber security training for college staff - NCSC.GOV.UK](#). and [Walsall Council Colleges Cybersecurity support](#)

Name	Role
Charlotte Wood	Designated Safeguarding Lead (DSL) Single Point of Contact Preventing Radicalisation (SPOC) Senior Mental Health Lead (Students)
Jatinder Sharma	Principal
David Wheeler	Chair of Governors
Paul Averis	Safeguarding Governor
Rachel Jones	Assistant Principal for MIS and Student Services
Chris Evans	Head of IT
Natalie Priest	Head of HR Senior Mental Health Lead (Staff)

Aishling McGowan Sasha James Selina Harra Steve Moysey	Deputy DSLs
Charlotte Wood	Designated Teacher
Vivienne Crawley	SEND Manager

- 2.11 [KCSIE \(2025\)](#) is statutory guidance and is understood and followed by our governing body, our senior leadership team, all staff and volunteers, as well as other key stakeholders like employers that we work with.

Whole Staff Responsibilities

- 2.12 In our college staff, volunteers, and visitors will:

- Be familiar with and understand our Child Protection and Adults at Risk Safeguarding policy, with how we safeguard our students
- Be alert to signs and indicators of abuse, exploitation, neglect, and other harms
- Be involved in the implementation of individual education programmes, child in need plans, child protection plans and early help assessments where necessary
- Be subject to Safer Recruitment processes and checks, whether they are new staff, supply staff, contractors, volunteers etc
- Participate in reviews undertaken by Walsall Safeguarding Partnership as required

The Responsibilities of Designated Teacher

- 2.13 The Designated Teacher (DT) should have lead responsibility for helping College staff understand the things which affect how looked after children learn and achieve.
- 2.14 The most common reason for children becoming looked after is as a result of abuse and/or neglect. Our Governing body will ensure that staff have the skills, knowledge and understanding necessary to keep looked after children safe. A care experience student potentially remains vulnerable and all our staff will have the skills, knowledge and understanding to keeping these students safe.
- 2.15 The DT works closely with our Care Experienced Facilitator (CEF) who is passionate about:
- Promoting a culture of high expectations and aspirations for how our care experienced students
 - Our care experienced students comprise of living with foster parents/carers, friends or relatives through kinship foster care, a residential children's home, secure unit, or semi-independent living accommodation, and those in kinship care
 - Ensuring the young person has a voice in setting targets and progression

- Ensuring our care experienced students are prioritised for one-to-one tuition arrangements when extra scaffolding is required and that carers understand the importance of supporting additional learning at home
- Chair and facilitate the development and implementation of the student's personal education plan (PEP) within our college community
- All care experienced students must have a PEP as part of their overall care plan and the PEP should be sent to the designated teacher when the child becomes care experienced or joins our college
- The PEP is a shared document which includes the information that everyone needs to help their conversations, planning and the delivery of strategies required to make sure the child gets the support and provision needed to succeed

2.16 Our DT and CEF work collaboratively to ensure:

- The PEP is used as a tool in College to make sure the child's progress towards education targets is monitored
- The PEP is updated and available in time for the local authority review of the student's wider care plan
- That for each statutory review of the care plan, the PEP must include any new information about progress towards education targets since the last PEP review
- The DT and CEF has a key role in helping our care experienced students make a smooth transition to their next, including making sure there are effective arrangements in place for the speedy transfer of information
- The DT has a key role in making sure there is a central point of initial contact within the college who can manage the process of how the college engages with others, in a joined-up way to minimise disruption to the student's education
- To ensure that there is an agreed process in place for how the College works with others in focusing on how everyone contributes to promoting the child's educational achievement
- That our college does everything possible to maximise educational stability for the child, especially by finding ways of sharing information through the PEP and in providing advice to the local authority about the impact of disrupting education

Training

- 2.17 All staff and volunteers will receive Safeguarding training, this is outsourced through iHasco and all staff must complete the module.
- 2.18 All staff and volunteers will receive Onboarding Training – this is mandatory and will include signposting and information regarding the following:
- Our Child Protection and Safeguarding Policy
 - Our Student Support Policy
 - Our Safer Recruitment Policy and Procedure
 - Our Staff Code of Conduct
 - Our Online Safety Policy
 - The role of our DSL and DDSLs
 - With a further explanation of the role of the DSL (including the identity of DSL, DDSL, and wider Safeguarding and Wellbeing Team)

- Our Safeguarding and Wellbeing Team will attend specialised DSL training every two years
 - In addition to formal training, the wider team will continue to industry upskill with training that is relevant to their role, to ensure their knowledge and skills are up to date
 - All staff familiarise themselves with part one and Annex A of [KCSIE \(2025\)](#) Annex A is a condensed version of part one, all staff who work directly with children in our college will read and sign acceptance of understanding, through [MyConcern](#) at the start of each academic year
- All staff will receive regular safeguarding and child protection updates, through team meetings, to provide them with knowledge of any nuances to ensure they are confident with safeguarding our students effectively
- Safer Recruitment training is available to all relevant staff and governors who are involved in the recruitment process

2.19 Walsall Safeguarding Partnership and Walsall Council offers training in Safeguarding Children and Young People, Child Protection, Safer Recruitment and other topics relating to safeguarding children.

2.20 Staff training is not only crucial in protecting children and adults, but also makes them aware of how they can protect themselves against allegations. Further information about these courses can be accessed via the Walsall Safeguarding Partnership website.

The Statutory Framework and Legislative Duties

2.21 In order to safeguard and promote the welfare of children and adults, our college will act in accordance with the following legislation and guidance:

- [The Children Act 1989](#)
- [The Children Act 2004](#)
- [Education Act 2002](#) (section 175/157)
- [Walsall Safeguarding Partnership](#)
- [Children and Social Work Act 2017](#)
- [The Care Act 2014](#) (sections 42 – 46)

2.22 The Children Act 2004 places a statutory responsibility as follows:

- All colleges and further education institutions have a statutory duty to safeguard and promote the welfare of children
- All staff in these establishments, play an important part in safeguarding children from abuse, neglect, and exploitation by early identification of children, who may be vulnerable or at risk of harm and by educating children, about managing risks and improving their resilience through the curriculum
- All colleges and further education institutions should create and maintain a safe environment for students to share any instances of harm or know to refer themselves to the Safeguarding and Wellbeing Team

Local and National Responsibilities

2.23 Our college will fulfil their local and national responsibilities as laid out in the following documents:

- [Keeping Children Safe in Education \(2025\)](#)
- [Teaching Online Safety in Schools - GOV.UK \(www.gov.uk\)](#)
- [Working Together to Safeguard Children \(2023\)](#)
- [Welcome to the Walsall Children's Services Procedures Manual](#)
- [Walsall Safeguarding Partnership](#)
- [Walsall Safeguarding Partnership - Adults](#)
- [The Education Act \(2002\) - s157/s175](#)
- [Education inspection framework](#)

Safeguarding and Prevent Committee Responsibilities

2.24 The Safeguarding and Wellbeing Committee meet on a termly basis and undertake the following:

- To continue strengthening the transparency of our Safeguarding and Prevent processes throughout all areas of Walsall College
- To support in creating a joined-up, open, and dynamic approach to our collective Safeguarding and Prevent responsibilities for all our members of our community
- Agree protocols and procedures that reflect best practice approach to Safeguarding and Prevent duty
- To share information and updates to bring all areas of Walsall College together
- To continue to develop an open, sensitive, and inclusive approach towards our Safeguarding and Prevent responsibilities that is embedded seamlessly across Walsall College
- Share learning and casework developments to improve awareness and compliance
- To receive updates from the Designated Safeguarding Lead and deputies in all aspects related to Safeguarding policy and practice ensuring strategies are in place across Walsall College
- This is to ensure that all staff take full responsibility for the safeguarding needs of our community and have confidence in doing this
- Continually review staff development activity around Safeguarding practice and Prevent duty, to equip the workforce with confidence, awareness, and toolkits to enable a consistently proactive safeguarding culture that supports our student's mental health and wellbeing needs
- DSL and deputies to support all managers with how we can continue to develop this confidence and awareness with Safeguarding and Prevent

3. Policy

Part One – Our College

- 3.1 Our college is aware of and assesses the risks in the wider community, when considering the wellbeing and safety of our students. We are aware of indicators of abuse, exploitation, and neglect. We understand that children and adults can be at risk inside and outside of home, college, and online.
- 3.2 Safeguarding and promoting the welfare of children is everyone's responsibility. Everyone who comes into contact with children and their families has a role to play. To fulfil this responsibility effectively, all professionals should make sure their approach is child centred. This means that they should consider, always, what is in the best interests of the child.
- 3.3 Safeguarding and promoting the welfare of children is defined for the purposes of this guidance as:
- Providing help and support to meet the needs of children as soon as problems emerge
 - Protecting children from maltreatment, whether that is within or outside the home, including online
 - Preventing impairment of children's mental and physical health or development
 - Ensuring that children grow up in circumstances consistent with the provision of safe and effective care
 - Taking action to enable all children to have the best outcomes in line with the outcomes set out in the Children's Social Care National Framework
- 3.4 Our college follows the child protection procedures as defined by [Walsall Safeguarding Partnership](#) and the multi-agency threshold guidance, [Walsall Right Help, Right Time - A Continuum of Need](#). We work with partners to ensure the best outcomes for children and young people.
- 3.5 We work with our partners in the Walsall Safeguarding Partnership by representing education and actively participating in key strategic and operational forums. The DSL and DDSLs attend the Learning and Development Group, Safeguarding Education Group, Adults PQA, Children's PQA, Adolescents and Transitional Safeguarding Group, and the Child Neglect Group. This ensures the college contributes to shaping local safeguarding priorities, shares good practice, and remains informed of emerging risks and learning to strengthen our safeguarding culture.
- 3.6 This policy has been developed with support from Walsall Local Authority, Safeguarding Board Manager, the Walsall Safeguarding Adult Board (WSAB), the West Midlands Regional Procedures and with reference to [The Care Act 2014](#).
- 3.7 We also work and engage with several different boroughs such as Wolverhampton, Sandwell, Dudley, Birmingham, Solihull, West Bromwich, Staffordshire. We have worked with other local authorities, from a variety of agencies, depending on the locality of the students address.

- 3.8 This policy applies to all staff, volunteers and visitors, employers, as safeguarding is everyone's responsibility. Our belief is that **"it could happen here"** and we have the interest of students as our priority.
- 3.9 We have created a safeguarding and guidance information booklet around what safeguarding and prevent is. What to look out for, how to get guidance quickly, and further information regarding our collective roles and responsibilities when it comes to safeguarding. Please see Appendix One.
- 3.10 We are aware that our students may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, they may not recognise their experiences as harmful. We know our students may feel embarrassed, humiliated, or being threatened.
- 3.11 This does not prevent our staff from having a professional curiosity, speaking to a DDSL or DSL if they have concerns about a student. Our staff determine how best to build trusted relationships with our students, that helps facilitate communication and promote positive outcomes.
- 3.12 It is vital that we ensure our students wishes, feelings, and voice are considered when determining what action to take and what services to provide.
- 3.13 We strive for a culture where our students can confidently report harm, know their concerns will be treated seriously, and know they can safely express their views and give feedback through.

Part Two – Defining Harm for Child Protection and Adults at Risk

Child Protection

Abuse

- 3.14 Abuse is a form of maltreatment of against a person. Somebody may abuse or neglect by inflicting harm, or by failing to act to prevent harm. Our students 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. Our students may be abused by an adult or adults, or another child or children.
- 3.15 Safeguarding incidents and patterns of behaviour can be associated with factors outside the college. Our staff, especially the DSL and DDSLs will be considering the context of such incidents as well as behaviours they are exhibiting. Such contextual safeguarding means our assessments of children will consider whether wider

environmental factors are present in a student's life that are a threat to their safety or welfare.

- 3.16 Additionally, Children's Services assessments should consider, where children are being harmed in contexts outside the home, so it is important that we provide as much information as possible, as part of the referral process. This allows any assessment to consider all the available evidence and enable a contextual approach to address such harm.
- 3.17 All staff are aware that behaviours linked to drug taking, alcohol abuse, missing education and sexting, put all children in danger.

Physical abuse

- 3.18 Physical abuse is a form of abuse which may involve hitting, shaking, throwing, poisoning, burning, 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.
- 3.19 The following may be indicators of physical abuse (this is not designed to be used as a checklist):
- Multiple bruises in clusters, or of uniform shape
 - Bruises that carry an imprint
 - Bite marks
 - Round burn marks
 - Multiple burn marks and burns on unusual areas of the body
 - An injury that is not consistent with the account given
 - Changing or different accounts of how an injury occurred
 - Bald patches
 - Symptoms of drug or alcohol intoxication or poisoning
 - Fear of going home or parents being contacted
 - Fear of medical help
 - Fear of changing into clothes for other activity
 - Inexplicable fear of adults or over-compliance
 - Violence or aggression towards others, including bullying
 - Isolation from other students

Emotional Abuse

- 3.20 The persistent emotional mistreatment of a child, that can cause severe and adverse effects on their emotional development and literacy. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say, or how they communicate.

3.21 It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning or preventing the child from participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

3.22 The following may be indicators of emotional abuse (this is not designed to be used as a checklist):

- The child consistently describes themselves in very negative ways
- Over-reaction to mistakes and lack of resilience
- Sudden speech or sensory disorders
- Behaviours rocking, banging head, tics, and twitches
- Self-harming, drug or alcohol abuse
- Fear of parents being contacted
- Running away
- Compulsive stealing
- Appetite disorders
- High criticism, low warmth observed from the caregivers
- Some situations where children stop communication suddenly, known as "traumatic mutism"

Sexual abuse

3.23 Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse.

3.24 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 in education.

3.25 The following may be indicators of sexual abuse (this is not designed to be used as a checklist):

- Sexually explicit behaviour

- Disclosures of genital discharge, soreness or scratching
- Reluctance to go home
- Inability to concentrate, tiredness and refusal to communicate
- Attention seeking behaviour
- Aggressive behaviour including sexual harassment or molestation
- Unusual compliance
- Touching others inappropriately
- Depression, withdrawal, isolation from peer group
- Reluctance to undress for PE or swimming

3.26 We understand that staff need support when managing cases of sexual abuse and will access materials from CSA Centre of Expertise on Child Sexual Abuse which has free evidence-based practice resources to help professionals working with children and young people to identify and respond appropriately to concerns of child sexual abuse.

Neglect

3.27 The persistent failure to meet a child's basic physical as well as psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy because of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to:

- Provide adequate food, clothing and shelter (including exclusion from home or abandonment)
- Protect a child from physical and emotional harm or danger
- Ensure adequate supervision (including the use of inadequate caregivers)
- Ensure access to appropriate medical care or treatment
- It may also include neglect of, or unresponsiveness to, a child's basic emotional needs

3.28 The following may be indicators of neglect (this is not designed to be used as a checklist):

- Stealing, scavenging, or hoarding food
- Frequent tiredness or listlessness
- Frequently dirty or unkempt
- Often poorly or inappropriately clad for the weather
- Poor college attendance or often late for college
- Poor concentration
- Illnesses or injuries that are left untreated
- Responsibility for activity that is not age appropriate such as cooking, ironing, caring for siblings

Exploitation

- 3.29 Sexual abuse 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 clothing.

Child Sexual Exploitation (CSE)

- 3.30 Sexual abuse 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 clothing.
- 3.31 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.
- 3.32 CSE can occur over time or be a one-off occurrence, and may happen without the child's immediate knowledge, for example, others sharing videos or images of them on social media. 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 as they believe they are in a genuine romantic relationship.
- 3.33 Indicators of child sexual exploitation may include:
- Acquisition of money, clothes, mobile phones, etc. without plausible explanation
 - Gang-association or isolation from friends
 - Exclusion or unexplained absences from college
 - Leaving home without explanation and persistently going missing or returning late
 - Excessive receipt of texts, messages, and phone calls
 - Returning home under the influence of drugs or alcohol
 - Inappropriate sexualised behaviour for age
 - Sexually transmitted infections
 - Evidence of suspicions of physical or sexual assault
 - Relationships with controlling or significantly older individuals or groups
 - Multiple callers
 - Frequenting areas known for sex work
 - Concerning use of internet or other social media
 - Increasing secretiveness around behaviours
 - Self-harm or significant changes in overall wellbeing
- 3.34 Although the following vulnerabilities increase the risk of child sexual exploitation, it must be remembered that not all children with these indicators will be exploited. Child sexual exploitation can occur without any of these issues.

- 3.35 Our college refers to [Walsall Safeguarding Partnership](#) when considering the completion of our screening tool or [NWG risk assessment](#), as well as the government guidance for [CSE](#).
- 3.36 Potential vulnerabilities include:
- Having a prior experience of neglect, physical and/or sexual abuse
 - Lack of a safe and stable home environment, past or present factors can like domestic abuse, parental substance misuse, mental health issues, and criminality
 - Recent bereavement or loss
 - Absence of a safe environment to explore sexuality
 - Economic vulnerability
 - Homelessness or insecure accommodation status
 - Connections with other children and young people who are being sexually exploited
 - Family members or other connections involved in adult sex work
 - Having a physical or learning disability
 - Being in care (particularly those in residential care and those with interrupted care histories)

Child Criminal Exploitation (CCE)

- 3.37 Our staff are aware that 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. Our students can also be forced or manipulated into committing vehicle crime, threatening or committing serious violence to others.
- 3.38 The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact; it can also occur using technology.
- 3.39 Our staff are alerted to the fact that the experience of females who are criminally exploited can be very different to that of males. The indicators may not be the same; however, we are aware that females are at risk of criminal exploitation too. We know that both males and females being criminally exploited, may be at higher risk of sexual exploitation.
- 3.40 Some of the following can be indicators of CCE:
- Appearing with unexplained gifts or new possessions
 - Associating with others who are already involved in exploitation
 - Changes in behaviour and wellbeing
 - Misusing drugs and alcohol
 - Students who go missing for periods of time or regularly come home late

- Students who are regularly absent from college or education or do not take part in education

- 3.41 County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs into one or more importing areas within the UK, using dedicated mobile phone lines or other form of “deal line”.
- 3.42 Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to move and store drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims.
- 3.43 Children can easily become trapped by this type of exploitation as county lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network. Further information on [CCE](#) can be found here.

Child Financial Exploitation

- 3.44 Child Financial Exploitation (CFE) is the term used to describe the action of using a young person’s bank account to move money obtained from illegal sources.
- 3.45 The process of money laundering, criminals will introduce the proceeds of their crimes into the banking system as a way of attempting to disguise its origin, making it appear as though it has come from a legitimate source.
- 3.46 Laundering the proceeds of crime is a criminal offence under The Proceeds of Crime Act (2002) and carries a maximum prison sentence of up to 14 years.
- 3.47 Our students may often be targeted online through social media or applications associated with online gaming, CFE can also happen in person. The exploiter will demand for the young person to disclose their bank details to them, on receiving these details they will then transfer a sum of money into the young person’s account. The student will be coerced into either transferring the money or withdrawing it in cash. In some instances, they hand over their bank accounts and physical cards.
- 3.48 The exploiter will leave a percentage of the money in the bank account as ‘payment’ which is part of the grooming process involved with CFE. In most cases, the young person will not know where this money has come from and therefore the way they have been exploited to play a role in laundering the proceeds of crime.
- 3.49 Whilst most young people who are financially exploited will not realise, they have transferred money generated from criminal activity through their account, doing so could lead consequences such as:

- Bank account being frozen, unable to open another account
- Unable to get a phone contract or other loans
- Unable to apply for student finance with no bank account
- Difficulty getting a job with no bank account
- Criminal conviction - laundering the proceeds of crime

ONLINE SAFETY

- 3.50 We know pupils increasingly work online, it is essential that children are safeguarded from potentially harmful and inappropriate online material. The Designated safeguarding lead has responsibility for ensuring all online access is appropriately, filtered, monitored, risk assessed, reviewed and updated as necessary. Please see our Online Safety Policy for further information.
- 3.51 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.
- 3.52 The breadth of issues classified within online safety is considerable, but can be categorised into four areas of risk:
- Content: being exposed to illegal, inappropriate or harmful material for example, pornography, fake news, racist or radical and extremist views. It now explicitly includes misinformation, disinformation, and conspiracy theories as safeguarding risk
 - 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, for example making, sending and receiving explicit images, or online bullying
 - Commerce: risks such as online gambling, inappropriate advertising, phishing and or financial scams. If you feel your students or staff are at risk, please report it to the [Anti-Phishing Working Group](#).
- 3.53 Where children are being asked to learn online at home the DfE has provided advice to support Colleges do so safely.
- 3.54 We are in regular contact with parents and carers. These communications are used to reinforce the importance of children being safe online. We hope parents and carers find it helpful to understand what systems we use to filter and monitor online use. It is especially important for parents and carers to be aware of what their children are being asked to do online, including the sites they will asked to access and be clear who from the College (if anyone) their child is going to be interacting with online.

- 3.55 Whilst considering our responsibility to safeguard and promote the welfare of children and provide them with a safe environment in which to learn, our governing body will do all that they reasonably can to limit children's exposure to the above risks from the College's IT system.
- 3.56 Our governing body is committed to consider the age range of our children, the number of children, how often they access the IT system and the proportionality of costs verses safeguarding risks. Staff are also aware that they need to fully and actively monitor the use of technology both in the classroom and any tasks set at home.

Filtering and Monitoring

- 3.57 The College is committed to ensuring that all students, including children and adults at risk, are protected from harmful and inappropriate online content. The College utilises Smoothwall filtering and monitoring systems to provide effective oversight of internet use.
- 3.58 These systems operate in real time, are age and stage appropriate for students from 14 years upwards, and are subject to regular review to ensure compliance with statutory safeguarding duties. Monitoring reports are reviewed by designated safeguarding staff, and any concerns identified are acted upon in accordance with College safeguarding procedures.

Generative AI and Emerging Technologies

- 3.59 In accordance with the Department for Education's *Generative AI: Product Safety Expectations* and the *Plan Technology for Your School* guidance, the College recognises the need to manage the risks associated with generative artificial intelligence and other emerging technologies.
- 3.60 The College will ensure that such technologies are subject to appropriate filtering, monitoring, and risk assessment processes, and that their use aligns with our statutory duty to safeguard children and adults at risk. The risks of exposure to misinformation, disinformation, and conspiracy theories are explicitly recognised within our online safety framework, and staff and students will be supported through education, training, and robust oversight to mitigate these risks.

Further Specific Risks

- 3.61 All staff should have an awareness of safeguarding issues that can put children at risk of harm. Behaviours linked to issues such as drug taking, alcohol misuse, deliberately missing education, references to misinformation, disinformation and conspiracy theories serious violence (including that linked to county lines),

radicalisation and consensual and non-consensual sharing of nude and semi-nude footage (also known as youth produced sexual imagery) put children in danger.

- 3.62 Consensual image sharing, especially between older children of the same age, may require a different response. It might not be abusive – but children still need to know it is illegal, whilst non-consensual is illegal and abusive. [UK Council for Internet Safety](#) provides detailed advice about sharing of nudes and semi-nude images and videos.
- 3.63 Annex A [KCSIE \(2025\)](#) is signposted to staff, read and understood by all staff/volunteers outlining risk as below:

The Court System

- 3.64 Children are sometime required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. There are two age appropriate guides [Young witness booklet for 5 to 11 year olds - GOV.UK \(www.gov.uk\)](#) and 12 -17 year olds [Young witness booklet for 12 to 17 year olds - GOV.UK \(www.gov.uk\)](#).
- 3.65 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.
- 3.66 Making child arrangements via the family courts following separation can be stressful and entrench conflict in families. This can be stressful for children. The Ministry of Justice has launched an online child arrangements information tool with clear and concise information on the dispute resolution service [Get help with child arrangements - GOV.UK](#). This may be useful for some parents and carers.
- 3.67 We will recognise these vulnerabilities and offer early help where necessary for the children, young people and their families to safeguard emotional wellbeing; we will access resources as defined in KCSIE (2025).

Children Absent from Education

- 3.68 All children, regardless of their circumstances, are entitled to a valuable educational experience which is suitable to their age, ability, aptitude and any special educational needs they may have. Local authorities have a duty to establish, as far as it is possible to do so, the identity of children of compulsory school age who are missing education in their area. We have specific protocols that relate to the attendance monitoring of our 14-16 provision onsite.
- 3.69 Knowing where our students are during college hours is an extremely important aspect of safeguarding. Students absent from education, particularly persistently,

can act as a vital warning sign to a range of safeguarding issues including abuse, neglect, and exploitation.

- 3.70 We will follow up with caregivers when students are not at college. This means we need to have a least two up to date contacts numbers for our students. Students and caregivers are reminded to update the college, as soon as possible, if the numbers change.
- 3.71 Our college has:
- Staff who understand what to do when students are absent
 - Appropriate policies, procedures and responses for students who are absent from education (especially on repeat occasions)
 - Staff understand signs and triggers for travelling to conflict zones, female genital mutilation (FGM) and forced marriage

Family Members in Prison, Custody, or Offending

- 3.72 These children are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. We will work with the children and their families, to mitigate the harm. By offering early help and wellbeing support following witnessing arrests, trauma of prison visits, concerns regarding an offender's release and return home.

Children who are Lesbian, Gay, Bisexual, or Gender Questioning

- 3.73 A child or young person being lesbian, gay, or bisexual is not in itself an inherent risk factor for harm, however, they can sometimes be targeted by others. In some cases, a child who is perceived by other children to be lesbian, gay, or bisexual (whether they are or not) can be just as vulnerable as children who are.
- 3.74 However, the Cass review identified that caution is necessary for children questioning their gender as there remain many unknowns about the impact of social transition and others may well have wider vulnerabilities, including having complex mental health and psychosocial needs, and in some cases including having complex mental health and psychosocial needs, and in some cases additional diagnoses of autism and/or attention deficit hyperactivity disorder
- 3.75 It recommended that when families/carers are making decisions about support for gender questioning children, they should be encouraged to seek clinical help and advice. When parents are supporting pre-pubertal children, clinical services should ensure that they can be seen as early as possible by a clinical professional with relevant experience.
- 3.76 Risks can be compounded where children lack trusted adults with whom they can be open. It is therefore vital that staff endeavour to reduce the additional barriers faced

and create a culture where they can speak out or share their concerns with members of staff.

Mental Health

- 3.77 All our staff are aware that mental health problems can, in some cases, can be an indicator that a student is at risk of suffering abuse, neglect, or exploitation.
- 3.78 Our staff are well placed to observe those behaviours and actions, which suggest they may be experiencing poor mental health problem or an overall decline in wellbeing.
- 3.79 We understand that when children have suffered abuse, neglect and exploitation, or other potentially traumatic adverse childhood experiences (especially in the context of Covid 19), this can have a lasting impact throughout childhood, adolescence, and into adulthood. We know that early help is critical when supporting our students who are suffering and not in the best place, for whatever reason.
- 3.80 If our staff have a mental health concern about a student then this must be reported to our Safeguarding and Wellbeing Team, either via [MyConcern](#) or using the crisis intervention process. Immediate action will be taken as with all other vulnerabilities.
- 3.81 We can receive key information from our wider community including students, apprentices, professionals, families, local authorities, employers, and much more to widen the narrative. These stakeholders will be able to fill out a safeguarding, mental health, and wellbeing form through MyVoice.
- 3.82 This information will feed into MyConcern allowing us to be in receipt of more information than we have been exposed to previously and will create a wider safeguarding picture. This will allow us to identify more students who need a safe space and support.
- 3.83 Our college promotes resilience as part of a whole college approach to social and emotional wellbeing, and this is tailored to our students.

Children with Special Educational Needs and Disabilities

- 3.84 In our college we understand that children and young people with special educational needs and disabilities can face additional safeguarding challenges because:
- There may be assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration
 - Children with SEN and disabilities can be disproportionately impacted by things like bullying without outwardly showing any signs
 - Difficulties may arise in overcoming communication barriers

Domestic Abuse

- 3.85 We know that domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional.
- 3.86 Children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have a detrimental and long-term impact on their health, wellbeing, development, and ability to learn.
- 3.87 All of our staff understand that exposure to domestic abuse 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.
- 3.88 Domestic Abuse is any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse, and can be perpetrated by intimate partners or family members regardless of gender or sexuality.

Controlling behaviour

- 3.89 Controlling behaviour is a range of acts designed to make a person subordinate 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 behaviour.

Coercive behaviour

- 3.90 Coercive behaviour 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.
- 3.91 Our college is signed up to Operation Encompass, the Walsall Joint Agency Protocol for Domestic Abuse – notifications to colleges and colleges. This protocol sets out the Walsall plan for a multi-agency operation to notify colleges when a student has experienced domestic abuse in their household, which will allow the college to provide appropriate early intervention and support in a timely manner. The DSL and DDSL will receive notifications and ensure the children receive the right help at the right time.
- 3.92 Additional support is available from Operation Encompass and provides an advice and helpline service for all staff members from educational settings who may be concerned about children who have experienced domestic abuse. The helpline is available 8AM to 1PM, Monday to Friday on 0204 513 9990.
- 3.93 Further information can be accessed via:

- [Domestic violence and abuse](#)
- [NSPCC - UK domestic-abuse signs symptoms effects](#)
- [SafeLives: young people and domestic abuse](#)

Off-site Arrangements

- 3.94 Where extended college activities are provided by and managed by our college, our own child protection policy and procedures apply.
- 3.95 When our governing body hire or rent out college facilities/premises to organisations or individuals (for example to community groups, sports associations, and service providers to run community or extra-curricular activities) they will ensure that appropriate safeguarding policies and procedures are in place to keep children safe.
- 3.96 When services or activities are provided by our governing body, under the direct supervision or management of our college staff, our arrangements for child protection will apply.
- 3.97 However, where services or activities are provided separately by another body this is not necessarily the case. Our governing body therefore seek assurance that the body concerned has appropriate safeguarding and child protection policies and procedures in place (including inspecting these as needed); and ensure that there are arrangements in place to liaise with college on these matters where appropriate. In the event a Position of Trust (POT) is raised regards staff using the premises the college would follow their policy and procedures for reporting.
- 3.98 Our governing body will also ensure safeguarding requirements are included in any transfer of control agreement, i.e., lease or hire agreement, as a condition of use and occupation of the premises; and that failure to comply with this would lead to termination of the agreement.
- 3.99 When students attend off-site activities, including day and residential visits and work-related activities, our college will ensure that the proprietors of the activity operate safe practices to maintain the safety of our children and liaise with investigating agencies in the locality relevant to where the concern has taken place.

Homelessness

- 3.100 Our staff understand that being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. Our DSL and DDSL's are aware of contact details and referral routes in to the Local Housing Authority so they can raise/progress concerns at the earliest opportunity.
- 3.101 We are aware that indicators may be:

- Household debt
- Rent arrears
- Domestic abuse
- Anti-social behaviour
- The family being asked to leave a property

3.102 We recognise 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 level of intervention and support.

Honour Based Abuse: Forced Marriage, Female Genital Mutilation (FGM) and Breast Ironing

3.103 Honour Based Abuse (HBA) encompasses crimes which have been committed to protect or defend the honour of the family or the community, including FGM, forced marriage, and practices such as breast ironing. All forms of HBA are serious, regardless of the motivation, and will be handled and reported as such.

3.104 If our staff have a concern regarding a child that might be at risk of HBA or who has suffered from HBA, they will speak to our DSL or DDSL. We understand that if FGM has taken place, since 31 October 2015 there has been a mandatory reporting duty placed on teachers that requires a different approach as below.

Female Genital Mutilation (FGM)

3.105 FGM refers to procedures that intentionally alter or cause injury to the female genital organs for non-medical reasons, the practice is illegal in the UK.

3.106 FGM typically takes place between birth and around 15 years old; however, it is believed that the majority of cases happen between the ages of 5 and 8.

3.107 Risk factors for FGM include:

- Low level of integration into UK society
- Mother or a sister who has undergone FGM
- Visiting female elder from the country of origin
- Being taken on a long holiday to the country of origin
- Talk about a 'special' procedure to become a woman

3.108 FGM may be likely if there is a visiting female elder, there is talk of a special procedure or celebration to become a woman, or parents wish to take their daughter out-of-college to visit an 'at-risk' country (especially before the summer holidays), or parents who wish to withdraw their children from learning about FGM. Staff will not assume that FGM only happens outside the UK.

3.109 Indications that FGM may have already taken place may include:

- Difficulty walking, sitting or standing and may even look uncomfortable
- Spending longer periods of time away from a classroom during the day with bladder or menstrual problems
- Prolonged or repeated absences from college or college, especially with noticeable behaviour changes like withdrawal or depression on her return
- Confiding in a professional without being explicit about the problem due to embarrassment or fear
- Talking about pain or discomfort between her legs

3.110 We know that where a teacher, including agency staff, discovers that an act of FGM appears to have been carried out on a girl who is aged under 18, there is a [statutory duty](#) upon that individual to report it to the police. Teachers know they must personally report to the police cases where they discover that an act of FGM appears to have been carried out.

3.111 Unless our teachers have good reason not to, they will still consider and discuss any such case with our colleges DSL and DDSLs and involve Children's Services as appropriate. The duty does not apply in relation to at risk or suspected cases, for example, where teachers do not discover that an act of FGM appears to have been carried out, either through disclosure by the victim or visual evidence) or in cases where the woman is 18 or over. In these cases, teachers will follow our safeguarding procedures and those set out in this policy.

Forced Marriage

3.112 The legal age at which a marriage can take place is now 18 and applies to non-binding, unofficial marriages as well as legal marriages. [A forced marriage](#) is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological.

3.113 A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some communities use religion and culture as a way to coerce a person into marriage. We can play an important role in safeguarding children from forced marriage, our staff have been briefed on the indicators of possible forced marriage and honour-based abuse and will refer any concerns to the DSL immediately.

Online Safety

3.114 We know students increasingly work online, it is essential that children are safeguarded from potentially harmful and inappropriate online material. The DSL has responsibility for ensuring all online access is appropriately, filtered, monitored, risk assessed, reviewed, and updated as necessary.

- 3.115 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.
- 3.116 The breadth of issues classified within online safety is considerable, but can be categorised into four areas of risk:
- Content: being exposed to illegal, inappropriate or harmful material; for example, 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; for example, making, sending and receiving explicit images, or online bullying
 - Commerce: risks such as online gambling, inappropriate advertising, phishing and or financial scams. If you feel your students, students or staff are at risk, please report it to the [Anti-Phishing Working Group](#).
- 3.117 Where children are being asked to learn online at home the DfE has provided advice to support colleges and colleges do so safely.
- 3.118 We are in regular contact with parents and carers. These communications are used to reinforce the importance of children being safe online. We hope parents and carers find it helpful to understand what systems we use to filter and monitor online use. It is especially important for parents and carers to be aware of what their children are being asked to do online, including the sites they will be asked to access and be clear who from the college (if anyone) their child is going to be interacting with online.
- 3.119 Whilst considering our responsibility to safeguard and promote the welfare of children and provide them with a safe environment in which to learn, our college will do all that we reasonably can to limit children's exposure to the above risks from the college's IT system. As part of this process, our governing body ensures our college has appropriate technological filtering and monitoring systems in place and regularly review their effectiveness. They ensure that our leadership team and relevant staff have an awareness and understanding of the provisions in place and manage them effectively and know how to escalate concerns when identified.
- 3.120 Our governing body is committed to consider the age range of our children, the number of children, how often they access the IT system and the proportionality of costs versus safeguarding risks. Staff are also aware that they need to fully and actively monitor the use of technology both in the classroom and any tasks set at home.

Child-on-Child Abuse

- 3.121 Staff are aware that safeguarding issues can manifest themselves via child-on-child abuse. This is most likely to include, but not limited to:
- Bullying including cyberbullying, prejudice-based and discriminatory bullying
 - Abuse in intimate personal relationships between children, also known as teenage relationship abuse
 - Physical abuse which can include hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm
 - Sexual violence and sexual harassment
 - Consensual and non-consensual sharing of nude and semi-nude images and/or videos, also known as sexting or youth produced sexual imagery
 - 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
 - Upskirting (which is a criminal offence), 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
- 3.122 Abuse is abuse and will never be tolerated or passed off as “banter” or “part of growing up”. Different gender issues can be prevalent when dealing with child-on-child abuse.
- 3.123 In our college we believe that all children have a right to attend college and learn in a safe environment, our students should be free from harm by adults in the college and other students.
- 3.124 We recognise that some students will sometimes negatively affect the learning and wellbeing of others and their behaviour will be managed via our Student Support Policy.
- 3.125 Allegations may be made against students by others in college which are of a safeguarding nature. Safeguarding issues raised in this way may include physical abuse, emotional abuse, sexual abuse and sexual exploitation. It is likely that to be considered a safeguarding allegation against a student, some of the following features will be found:
- Is made against an older student and refers to their behaviour towards a younger student or a more vulnerable student
 - Is of a serious nature, possibly including a criminal offence
 - Raises risk factors for other students in the college
 - Indicates that other students may have been affected by this student
 - Indicates that young people outside the college may be affected by this student

- 3.126 **All victims will be taken seriously and offered appropriate support.** Staff are aware that some groups are potentially more at risk. Evidence shows girls, children with SEND, and LGBT children are at greater risk.
- 3.127 Our staff will record and report all issues of child-on-child abuse via [MyConcern](#) that will be triaged by the DSL and DDSLs to ensure the best action is taken to safeguard children and young people in our college. Our curriculum endorses child-on-child abuse is not acceptable and our actions are supported by associated safeguarding policy and procedures in our college (Anti Bullying, Student Behaviour, E Safety, Acceptable Use and broader child protection procedures).
- 3.128 Children and young people who abuse others will be responded to in a way that meets their needs as well as protecting others within the college community through a multi-agency risk assessment. We ensure that the needs of children and young people who abuse others will be considered separately from the needs of their victims.
- 3.129 Risk assessments will be recorded will be kept under review. At all times we will be actively considering the risks posed to all our students and students and put adequate measures in place to protect them and keep them safe. Our risk assessment is not intended to replace the detailed assessments of expert professionals. Any such professional assessments will be used to inform our approach to supporting and protecting our students and updating our own risk assessment.

Preventing Radicalisation

- 3.130 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* people from becoming terrorists or supporting terrorism
 - *Pursue* terrorists to disrupt their plots is designed to reduce the threat
 - *Protect* against a terrorist attack and reduce vulnerability
 - *Prepare* to mitigate the impact of any attack
- 3.131 In the Counter-Terrorism and Security Act 2015 this has simply been expressed as "prevent people from being drawn into terrorism".
- 3.132 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

- Work with sectors and institutions where there are risks of radicalisation that we need to address

- 3.133 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”.
- 3.134 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.
- 3.135 Our staff are aware that children can be susceptible to extremist ideology and radicalisation. Similar to protecting children from other forms of harms and abuse, protecting children from this risk is part of our colleges safeguarding approach.
- 3.136 As part of the Counter Terrorism and Security Act 2015, colleges have a duty to ‘prevent people being drawn into terrorism’, this has become known as the ‘Prevent Duty’.
- 3.137 Where our staff are concerned that children and young people are developing extremist views or show signs of becoming radicalised, they will report this via [MyConcern](#). Staff will receive updates regarding local, regional, and national updates as part of their termly safeguarding meetings.
- 3.138 Staff are alert to changes in children’s behaviour, which could indicate that they may be in need of help or protection. Staff use their judgement in identifying children who might be at risk of radicalisation and act proportionately, which may include the DSL or DDSL making a Prevent referral.
- 3.139 We are committed to ensuring that our students are offered a broad and balanced curriculum that aims to prepare them for life in modern Britain. Teaching the college’s core values alongside the fundamental British Values supports quality teaching and learning, whilst making a positive contribution to the development of a fair, just and civil society. We use the curriculum to ensure that children and young people understand how people with extreme views, share these with others, especially using the internet.

Recognising Extremism

3.140 Early indicators of radicalisation or extremism may include:

- Showing support for extremist causes
- Glorifying violence, especially to other faiths or cultures
- Making remarks or comments about being at extremist events or rallies outside college
- Evidence of possessing illegal or extremist literature
- Advocating messages similar to illegal organisations or other extremist groups
- Out of character changes in dress, behaviour and peer relationships
- Secretive behaviour and changes in overall demeanour
- Online searches or sharing extremist messages or social profiles
- Intolerance of difference, including faith, culture, gender, race or sexuality
- Graffiti, art work or writing that displays extremist themes
- Attempts to impose extremist views or practices on others
- Advocating violence towards others

3.141 Our college governors, Principal, DSL & SPOC, and Assistant Principal for MIS and Student Services will assess the level of risk within our college and put actions in place to reduce that risk. We have risk assessments that include consideration of the college's personal development curriculum, SEND policy, assembly policy, the use of college premises by external agencies, integration of students by gender and SEN, anti-bullying policy and other issues specific to the college's profile, community and philosophy.

3.142 Radicalisation is the term used to describe the process where an individual becomes involved with or starts to support groups or ideologies with extremist beliefs. Those who become radicalised often end up getting drawn into serious abuse, which is why radicalisation is classed as a form of harm.

3.143 The broader responsibilities for our college are defined within the [Prevent duty guidance](#).

Channel

3.144 Our college's DSL and DDSL's are aware of local procedures for making a [Channel referral](#). Channel is a programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. It provides a mechanism for colleges to make referrals if they are concerned that an individual might be vulnerable to radicalisation.

3.145 Our college refers to [Educate Against Hate](#), a website launched by the Her Majesty's Government has been developed to support and equip educators on the promotion

of fundamental British values, to help recognise and address extremism and radicalisation in young people.

- 3.146 If a member of staff has concerns that a student may be at risk of radicalisation or involvement in terrorism, they must speak with a DSL or DDSL and make a referral via [MyConcern](#).

Private Fostering Arrangements

- 3.147 Our staff are aware that a private fostering arrangement is essentially one that is made privately (that is to say 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 of the 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.
- 3.148 It is the duty of local authorities 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, but our responsibility to be aware and refer children who may be privately fostered.
- 3.149 If our college makes arrangements for children to have learning experiences where, for short periods, the children may be provided with care and accommodation by a host family to whom they are not related then we will consider whether the arrangement where children stay with UK families could amount to "private fostering".
- 3.150 All staff in our college will inform the DSL or a DDSL of any children that fall into the category of private fostering.

Serious Violence

- 3.151 Our staff are aware of the indicators, which may signal children are at risk from, or are involved with serious violent crime. 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.
- 3.152 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 also may be at risk of criminal exploitation. Practical advice regarding [preventing youth violence and gang involvement](#) can be found there.

3.153 Staff are aware of the range of risk factors which increase the likelihood of involvement in serious violence:

- Being male
- Having been frequently absent or permanently excluded from college
- Having experienced child maltreatment
- Having been involved in offending, such as theft or robbery

Young Carers

3.154 We understand that a young carer is someone aged 18 or under who helps look after a relative who has a condition, such as a disability, illness, mental health condition, or a drug or alcohol problem.

3.155 Most young carers look after one of their parents or care for a brother or sister. They do extra jobs in and around the home, such as cooking, cleaning, or helping someone to get dressed and move around.

3.156 Some children give a lot of physical help to a parent or family member who is disabled or ill. Along with doing things to help your them, you may also be giving emotional support to others which can take a toll on mental health and wellbeing. More information regarding young carers can be found [here](#).

3.157 We know that some of the risks associated with being a young carer are risk of absence, under achievement, isolation, poor mental health, poor physical health, poverty and stress.

3.158 We will follow our safeguarding and child protection procedures if we are concerned and contact the Early Help Senior Project Officer Young Carers: Joanne.Phillips@walsall.gov.uk and can complete the [Young Carers screening and assessing tool](#) using our local procedures.

Adults at Risk

3.159 The individual's wellbeing is at the heart of the care and support system under the Care Act 2014 and the prevention of abuse, neglect, and exploitation is one of the elements identified to promote a person's wellbeing. In the context of the legislation, specific adult safeguarding duties apply to any adult who:

- Has care and support needs and
- Is experiencing, or is at risk of, abuse or neglect and
- Is unable to protect themselves because of their care and support needs

- 3.160 The following 6 principles apply to all sectors, including further education and should inform the ways in which professionals and other staff work with adults:
- **Empowerment** - People being supported and encouraged to make their own decisions and informed consent
 - **Prevention** - Taking action before harm occurs
 - **Proportionality** - The least intrusive response appropriate to the risk presented
 - **Protection** - Support and representation for those in greatest need
 - **Partnership** - Local solutions through services working with their communities. Communities have a part to play in preventing, detecting and reporting neglect and abuse
 - **Accountability** - Accountability and transparency in delivering safeguarding
- 3.161 There are naturally overlaps with child and adult safeguarding, the below definitions of abuse are some of the different types of abuse, neglect, and harm that are specific to vulnerable adults.

Physical Abuse

- 3.162 Physical abuse causes non-accidental harm to a person. It may involve hitting, shaking, throwing, poisoning, misuse of medication, burning, scalding, drowning or suffocating. It may be done deliberately or recklessly, or be the result of a deliberate failure to prevent injury occurring.
- 3.163 Possible indicators that physical abuse may be taking place could be: unexplained injuries or burns particularly if they are recurrent, improbable excuses given to explain injuries, refusal to discuss injuries, untreated injuries, admission of punishment which appears excessive, fear of parents being contacted, withdrawal from physical contact, fear of returning home, self-destructive tendencies, aggression towards others, running away.

Neglect or Acts of Omission

- 3.164 Neglect or self-neglect is the persistent or severe failure to meet a vulnerable adult's basic physical and/or psychological needs. It will result in serious impairment of the vulnerable adult's health or development. It includes ignoring medical or physical care needs, failure to provide or seek access to appropriate health care or social care or educational services and the withholding of or failure to access necessities, such as medication or adequate nutrition and heating.
- 3.165 Possible indicators include: constant hunger, poor personal hygiene, dental decay, constant tiredness, poor state of clothing/inappropriate clothing, emaciation, frequent lateness/absence from College, untreated medical/speech/hearing problems, lack of appropriate boundaries, lack of supervision/acknowledgement of safety issues, no social relationships.

Sexual Abuse

- 3.166 Sexual abuse involves a vulnerable adult being forced or coerced into participating in or watching sexual activity. It includes contact and non-contact sexual abuse: rape and sexual assault or sexual acts to which the adult has not consented or could not consent or was pressured into consenting.
- 3.167 In April 2021, the OfS published a statement of expectations for preventing and addressing harassment and sexual misconduct affecting students in further education.
- 3.168 The statement of expectations provides a set of consistent recommendations to support higher education providers in England develop and implement effective systems, policies and processes to prevent and respond to incidents of harassment and sexual misconduct. They state the underpinning principle that higher education students registered at a provider, however and wherever they may be studying, should be protected from harassment and sexual misconduct from other students, staff and visitors.
- 3.169 The expectations for Further Education and Higher Education are as follows:
- Providers to clearly communicate, and embed across the whole organisation, their approach to preventing and responding to all forms of harassment and sexual misconduct affecting students. They should set out clearly the expectations that they have of students, staff and visitors
 - Providers approach to harassment and sexual misconduct is adequate and effective. They should ensure that risks relating to these issues are identified and effectively mitigated
 - Providers should appropriately engage with students to develop and evaluate systems, policies and processes to address harassment and sexual misconduct
 - Providers should implement adequate and effective staff and student training with the purpose of raising awareness of, and preventing, harassment and sexual misconduct
 - Providers should have adequate and effective policies and processes in place for all students to report and disclose incidents of harassment and sexual misconduct
 - Providers should have a fair, clear and accessible approach to taking action in response to reports and disclosures
 - Providers should ensure that students involved in an investigatory process have access to appropriate and effective support.
- 3.170 The College has evidence of the effective operation of safeguarding policies, including cases of harassment and sexual misconduct, so there is a high degree of confidence that the College's policies and processes are well-placed in relation to the expectations listed above these include:

- Engaging in the College's safeguarding training and any additional CPD provided on understanding peer on peer/sexual abuse
- Being vigilant and aware of signs that abuse may be taking place - Challenging any behaviour that may constitute abuse behaviour
- Taking opportunities to educate our students in positive behaviours
- Reporting any concerns by following the College's safeguarding procedures Emotional or Psychological

Emotional Abuse

- 3.171 Emotional abuse occurs where there is persistent emotional ill treatment or rejection: actions that impact upon well-being. These could be emotional abuse, threats of harm or 10 abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, isolation or withdrawal from services or supportive networks. It causes severe and adverse effects on the vulnerable adult's or young person's behaviour and emotional development, resulting in low self-worth.

Financial or Material Abuse

- 3.172 This could include theft, fraud, exploitation, pressure in connection with wills, property or inheritance or financial transactions or the misuse or misappropriation or property, possessions or benefits.

Discriminatory Abuse

- 3.173 This could include oppressive and discriminatory attitudes towards vulnerable adults according to age, race, gender, disability, sexuality/sexual orientation, religion or cultural background. Any combination of these types of abuse may be found in one situation. They may be committed with deliberate intent, or as a result of ignorance or negligence.

Extremism

- 3.174 This could be vocal or active opposition to fundamental British Values including democracy, the rule of law, individual liberty, mutual respect and tolerance for those with different faiths and beliefs. Modern slavery This encompasses slavery, human trafficking, forced labour and domestic servitude. Traffickers and slave masters use whatever means they have at their disposal to coerce, deceive and force individuals to a life of abuse, servitude and inhumane treatment.

Part Three – Child on Child Sexual Violence and Harassment

- 3.175 This part explains our commitment from prevention to responses and procedures for managing child on child sexual abuse.
- 3.176 The roles of police and Children's Services is explained, and how we will support both victims and alleged convicted perpetrators of abuse.

- 3.177 All of our staff and volunteers are aware that sexual violence and sexual harassment can occur between two children of any age and sex from primary through to secondary stage and into colleges.
- 3.178 It can occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Sexual violence and sexual harassment exist on a continuum and may overlap; they can occur online and face to face and are never acceptable. We know this abuse may be driven by wider societal factors beyond our college, such as everyday sexist stereotypes and everyday sexist language and adapt our curriculum as below to overcome this wherever we can.
- 3.179 We make it clear that there is a zero-tolerance approach to sexual violence and sexual harassment and it is never acceptable, and it will not be tolerated and it will never be passed off as “banter”, “just having a laugh”, “part of growing up” or “boys being boys”. We will challenge physical behaviour (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts.
- 3.180 Addressing inappropriate behaviour (even if it appears to be relatively innocuous) can be an important intervention that helps prevent problematic, abusive and/or violent behaviour in the future.
- 3.181 It is vital that we deliver a curriculum that is balanced in supporting children and young people to understand what child on child sexual abuse is, and this needs to be delivered to all key stages to ensure that we are:

Prepared	Protecting	Preventing
• Understand the risk of harm and build capacity. • Build strong foundations and capacity to tackle Youth Violence in the long-term.	• Supporting and changing lives. • Creating connection and a feeling of safety and belonging for young people. • Effective youth engagement that builds trust and nurtures positive behaviours, beliefs and skills.	• Prevention and Intervention. • To be able to intervene at the earliest opportunity and maximise the early help offer to young people and families.

- 3.182 All staff in our college are regularly provided with updated and appropriate safeguarding training for them to understand:

- Their role in enabling preventing child-on-child abuse
- How to identify the indicators of abuse
- Abuse may be a sign they have been abused themselves or a sign of wider issues that require addressing within the culture of our college
- What to do if they have a concern about a child
- To maintain an attitude of '**it could happen here**'
- The importance of challenging inappropriate and abusive behaviour
- That females are more likely to be victims and males are more likely to be perpetrators
- Certain children may face additional barriers to telling someone because of their vulnerability, disability, sex, ethnicity and/or sexual orientation
- Children with Special Educational Needs and Disabilities (SEND) are three times more likely to be abused than their peers.

3.183 We understand that children can abuse other children inside and outside of college, as well as online, and that online abuse can take the form of:

- Abusive, harassing and misogynistic messages
- Non-consensual sharing of indecent nude and semi-nude images or videos, especially around chat groups
- Sharing of abusive images and pornography to those who do not want to receive such content

3.184 We teach our students:

- Age-appropriate boundaries with peers and others (including in a digital context)
- The concept of privacy and the implications of it for both children and adults; including that it is not always right to keep secrets if they relate to being safe
- Each person's body belongs to them, and the differences between appropriate and inappropriate or unsafe physical, and other, contact
- How to ask for advice or help for themselves or others, and to keep trying until they are heard
- How to report concerns or abuse, and the vocabulary and confidence needed to do so
- Where to get advice, signpost to other services, and reassure them that they will be taken seriously
- Our students will never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment
- Our students will never be made to feel ashamed for making a report

3.185 The curriculum includes teaching about:

- Healthy and respectful relationships
- What respectful behaviour is and looks like
- The importance of consent and legalities surrounding this
- Gender roles, stereotyping and equality
- Body confidence and self-esteem
- Prejudiced, discriminatory, and unkind behaviour
- Sexual violence and sexual harassment

3.186 Sexual violence is defined as:

- 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
 - We are 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.

Consent

3.187 Consent is defined as having the freedom and capacity to choose. The age of consent is 16 and sexual intercourse without consent is rape.

3.188 Consent to sexual activity may be given to one sort of sexual activity but not another, for example, 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.

Sexual Harassment

3.189 Sexual harassment is defined as:

- Unwanted conduct of a sexual nature' that can occur online and offline and both inside and outside of college
- Sexual harassment is likely to: violate a child's dignity, or to make them feel intimidated, degraded or humiliated or create a hostile, offensive or sexualised environment
- 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 (we consider 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
- Online sexual harassment, this may be part of a wider pattern of sexual harassment and/or sexual violence
- Consensual and non-consensual sharing of nude and semi-nude images and videos
- Sharing of unwanted explicit content is an offence
- Upskirting (is a criminal offence)
- Sexualised online bullying is an offence
- Unwanted sexual comments and messages, including, on social media
- Sexual exploitation, coercion and threats

Harmful sexual behaviour (HSB)

- 3.190 Children's sexual behaviour exists on a wide continuum, from normal and developmentally expected to be inappropriate, problematic, abusive and violent. Problematic, abusive and violent sexual behaviour is developmentally inappropriate and may cause developmental damage.
- 3.191 HSB can occur online or face to face and can also occur simultaneously between the two. HSB will be considered in a child protection context and Walsall Right Help, Right Time Continuum of Need guidance will be referred to as well as the [HSB toolkit](#).
- 3.192 When considering HSB, ages and the stages of development of the children are critical factors. Sexual behaviour between children can be considered harmful if one of the children is much older, particularly if there is more than two years' difference. However, a younger child can abuse an older child, particularly if they have power over them, for example, if the older child is disabled or smaller in stature.
- 3.193 We promote [Shore Space](#) to our students, as this is for further education and support.

Online

- 3.194 Sexual violence and sexual harassment occurring online, either in isolation or in connection to face to face incidents, can introduce a number of complex factors. These include the potential for the incident to take place across a number of social media platforms and services, and for things to move from platform to platform online.
- 3.195 It also includes the potential for the impact of the incident to extend further than a colleges local community. For example, for images or content to be shared around neighbouring colleges and for a victim, or alleged perpetrator, to become marginalised and excluded by both online and offline communities. There is also the strong potential for repeat victimisation in the future if abusive content continues to exist somewhere online.

The Legal status

- 3.196 It is unlawful for our college to act in a way that is incompatible with [The Equality and Human Rights Commission](#) rights include:
- Article 3: the right to freedom from inhuman and degrading treatment (an absolute right)
 - Article 8: the right to respect for private and family life (a qualified right) includes a duty to protect individuals' physical and psychological integrity
 - Article 14: requires that all of the rights and freedoms set out in the Act must be protected and applied without discrimination
 - Protocol 1, Article 2: protects the right to an effective education
- 3.197 Our Collegess procedures for responding to reports of sexual violence and sexual harassment:
- 3.198 Our starting point regarding any report will always be that there is a zero tolerance approach to sexual violence and sexual harassment and it is never acceptable and it will not be tolerated. It is especially important, not to pass off any sexual violence or sexual harassment as 'banter', 'just having a laugh', part of growing up' or 'boys being boys' as this can lead to a culture of unacceptable behaviours and an unsafe environment for children.
- 3.199 Procedures for online abuse and dealing with the concerns are:
- We will never view, download or share the imagery, or ask a child to share or download – this is illegal
 - If we have already viewed the imagery by accident (e.g. if a young person has showed it to you before you could ask them not to), we will report this to the Designated Safeguarding Lead (or their deputies)
 - We will not delete the imagery or ask the young person to delete it

- We will not ask the young person(s) who are involved in the incident to disclose information regarding the imagery. This is the responsibility of the Designated Safeguarding Lead and/or our statutory partners.
- We will not share information about the incident to other members of staff, the young person(s) it involves or their, or other, parents and/or carers unless advised by the Designated Safeguarding Lead and/or our statutory partners to do so.
- We will not say or do anything to blame or shame any young people involved.
- We will recognise the importance of understanding intra familial harms and any necessary support for siblings following incidents
- We will explain to them that you need to report it and reassure them that they will receive support and help from the Designated Safeguarding Lead

Confidentiality

- 3.200 As a matter of effective safeguarding practice we will do all we reasonably can to protect the anonymity of any children involved in any report of sexual violence or sexual harassment. Amongst other things, this will mean carefully considering, based on the nature of the report, which staff should know about the report and any support that will be put in place for the children involved. We will also consider the potential impact of social media in
- 3.201 Facilitating the spreading of rumours and exposing victims' identities. If required we will provide a physical space for victims to withdraw. [Gillick competence - Fraser guidelines](#)

Risk assessment

- 3.202 When there has been a report of sexual violence our DSL/DDSL will make an immediate risk and needs assessment. Where there has been a report of sexual harassment, this will enact our risk and vulnerability process as we will be considering:
- the victim, especially their protection and support
 - whether there may have been other victims
 - the alleged perpetrator(s)
 - all the other students (and, if appropriate, adult students and staff) in College especially any actions that are appropriate to protect them from the alleged perpetrator(s), or from future harm
- 3.203 Risk assessments will be recorded and be kept under review. At all times we will be actively considering the risks posed to all pupils and students and put adequate measures in place to protect them and keep them safe.
- 3.204 Where there has been a report of sexual violence, it is likely that professional risk assessments by social workers and or sexual violence specialists will be required also.

- 3.205 The wishes of the victim, the nature of the allegations and the protection of all children in College will be especially important when considering any immediate actions such as teaching timetables, break times and travelling to and from College.

Manage internally

- 3.206 In some cases of sexual harassment, for example, one-off incidents, we may take the view that the children concerned are not in need of early help or require referrals to be made to statutory services and that it would be appropriate to handle the incident internally, perhaps through utilising our behaviour and bullying policies and by providing pastoral support
- 3.207 All concerns, discussions, decisions and reasons for decisions will be recorded

Families First

- 3.208 We may decide that the children involved do not require referral to statutory services but may benefit from additional support from Families First, providing support as soon as an issue emerges, at any point in a child's life. Providing early support is more effective in responding to issues early to help minimise the likelihood of the concerns escalating, thereby promoting the welfare of children and families.
- 3.209 Families First can be particularly useful to address non-violent HSB and may prevent escalation of sexual violence.
- Families First and the ability to manage an issue internally do not need to be mutually exclusive: College may manage internally and seek support from Families First for both the victim and perpetrator(s).
 - All concerns, discussions, decisions and reasons for decisions will be recorded.

Part Four – Safer Recruitment Practice and Managing Allegations Against Staff

Our Safer Recruitment Processes

- 3.210 As part of our culture of a commitment to safeguarding our governing body and senior leaders adopt robust recruitment procedures that deter and prevent people who are unsuitable to work with children from applying for or securing employment, or volunteering opportunities in our college.
- 3.211 Key staff involved in recruitment processes will undertake Safer Recruitment Training offered by the organisation.
- 3.212 Further information can be found via our Safer Recruitment Policy.

Our Recruitment and Selection Process

3.213 Our adverts make clear that safeguarding checks will be undertaken and make clear our commitment to safeguarding by:

- Outlining the safeguarding responsibilities of the post as per the job description and personal specification
- Whether the post is exempt from the Rehabilitation of Offenders Act 1974 and the amendments to the Exceptions Order 1975, 2013 and 2020
 - For example, when an individual is applying for certain jobs and activities certain spent convictions and cautions are 'protected', so they do not need to be disclosed to employers, and if they are disclosed, employers cannot take them into account. For clarity and further information about filtering offences can be found in the [DBS filtering guidance](#).
- Where a role in our college involves engaging in regulated activity relevant to children, we will include a statement in the application form or elsewhere in the information provided to applicants that it is an offence to apply for the role if they are barred from engaging in regulated activity relevant to children

Ongoing vigilance in our college

3.214 Senior leaders, DSL's and our governing body ensures we have processes in place for continuous vigilance, maintaining an environment that deters and prevents abuse and challenges inappropriate behaviour. This includes regular safeguarding briefings, audits of our safeguarding recording systems, promotion and challenge of staffs understanding of our safeguarding ethos supported by safeguarding policies.

3.215 Our senior leaders have created the right culture and environment so that staff feel comfortable to discuss matters both within, and where it is appropriate, outside of the workplace, which may have implications for the safeguarding of children. This can assist us to support staff, where there is a need, and help them manage children's safety and welfare, potentially providing them with information that will help them consider whether there are further measures or changes to procedures that need to be put in place to safeguard children in their care.

3.216 Our college is alert to the requirements of referring an individual to the DBS if we believe they have:

- Engaged in relevant conduct in relation to children and/or adults which should result in them being unable to perform regulated activity
- Satisfied the harm test in relation to children and/or vulnerable adults
- Been cautioned or convicted of a relevant (automatic barring either with or without the right to make representations) offence
- Our college is alert to the duty to consider referral to the Teaching Regulation Agency because of an individual's serious misconduct, or might have dismissed them or ceased to use their services had they not left first

Safeguarding Concerns and Allegations made about staff, including agency, volunteers, and contractors

- 3.217 Despite our commitment to safer recruitment processes we are aware there may still be occasions when there is an allegation against a member of staff, agency staff, volunteer or contractor. Allegations against those who work with children, whether in a paid or unpaid capacity, cover a wide range of circumstances.
- 3.218 All allegations of abuse of children by those who work with children or care for them must be taken seriously.
- 3.219 In these circumstances all allegations against other members of staff or volunteers will be referred to the Head of HR or DSL. In their absence you should seek to speak with a member of staff from the Senior Leadership Team or HR Manager. If your concern is about the principal you need to speak to the Chair of Governors.
- 3.220 If a concern has reached the harm threshold, the following procedure will be applied in all situations where it is alleged that a person who works with children, including agency staff, volunteers and contractors 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
 - Behaved or may have behaved in a way that indicates they may not be suitable to work with children
- 3.221 Whilst we are not the employer of agency staff, we will ensure allegations are dealt with properly. When using agency staff, we will inform the agency of our process for managing allegations but also take account of the agency's policies and their duty to refer to the DBS as personnel suppliers. This will include inviting the agency's HR Manager or equivalent to meetings and keeping them up to date with information about its policies. The allegations may relate to the persons behaviour at work, at home or in another setting.
- 3.222 The LADO will discuss the matter with the Head of HR and DSL to determine what steps should be taken and where necessary obtain further details of the allegation and the circumstances in which it was made. The discussion will also consider whether there is evidence or information that establishes that the allegation is false or unfounded, whether a referral to the Children's Services is required or whether disciplinary action is appropriate.
- 3.223 Suspension will not be an automatic response when an allegation is reported. All options to avoid suspension will be considered prior to taking that step. The headteacher/governor must consider carefully whether the circumstances warrant

suspension from contact with children at college, or until the allegation is resolved. It will be considered only in cases where there is cause to suspect a child or other children at college are at risk of harm, or the case is so serious that it might be grounds for dismissal. Where it is deemed appropriate to suspend the person, written confirmation will be given within one working day, giving as much detail as appropriate for the reasons for the suspension. It is not acceptable for an employer to leave a person who has been suspended without any support. The person should be informed at the point of their suspension who their named contact is within college and provided with their contact details.

3.224 Parents or carers of the child or children involved should be:

- Formally told about the allegation as soon as possible, the Head of HR will consult the LADO and where involved Children's Services or the police on what information can be disclosed
- Kept informed about the progress of the case, only in relation to their child – no information can be shared regarding the staff member
- Made aware of the requirement to maintain confidentiality and unwanted publicity about any allegations made against teachers in colleges whilst investigations are in progress as set out in section 141F of the Education Act 2002.

3.225 Where the initial discussion leads to no further action, our Head of HR, DSL, and the LADO will:

- Record the decision and justification for it
- Agree on what information will be put in writing to the individual concerned and by whom

3.226 Some allegations will require immediate referral to the Children Services and the Police, but common sense and judgement will be applied in reaching a decision about what action to take. If the allegation is not patently false and there is cause to suspect that a child is suffering or is likely to suffer significant harm, the LADO will immediately refer the matter to the Children's Services and ask for a Strategy Discussion meeting to be convened.

3.227 Where the safety of other children is in question as a result of the allegation, consideration will be given to invoking the [Complex \(Organised or Multiple\) Abuse Procedure](#).

3.228 Some allegations may be less serious and at first sight might not seem to warrant consideration of a police investigation or enquiries by Children's Services. However, it is important to ensure that even apparently less serious allegations are followed up and examined objectively by someone independent of the organisation. Consequently, the LADO will be informed of all allegations that come to the employer's attention and appear to come within the scope of this procedure so that he or she can consult Police and Children's Services colleagues as appropriate.

- 3.229 Where a referral is made directly to Children's Services, they will consult with the Local Authority Designated Officer (LADO), the Police and the headteacher.
- 3.230 Where such allegations are made consideration must be given to the following three strands:
- The police investigation of a possible criminal offence
 - Enquiries and assessment by Children's Services as to whether the child is in need of protection or in need of services
 - Consideration by an employer of disciplinary action in respect of the individual
- 3.231 The definitions that will be used when we determine the outcome of an allegation are set out below:
- Substantiated: there is sufficient evidence to prove the allegation
 - Malicious: there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive or cause harm to the person subject of the allegation
 - False: there is sufficient evidence to disprove the allegation
 - Unsubstantiated: there is insufficient evidence to either prove or disprove the allegation. The term, therefore, does not imply guilt or innocence
 - Unfounded: to reflect cases where there is no evidence or proper basis which supports the allegation being made
- 3.232 If a report is determined to be unsubstantiated, unfounded, false or malicious, the DSL will consider whether the child and/or the person who has made the allegation is in need of help or may have been abused by someone else and this is a cry for help. In such circumstances, a referral to Children's Services may be appropriate. If a report is shown to be deliberately invented or malicious, we will consider whether any disciplinary action is appropriate against the individual who made it as per behaviour policies.

If a concern has not reached the harm or low-level concerns thresholds

- 3.233 Concerns may arise in several ways and from a number of sources. For example, suspicion, complaint; or disclosure made by a child, parent or other adult within or outside our colleges; or as a result of vetting checks undertaken.
- 3.234 A low-level concern is still a concern, no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' - that an adult working in or on behalf of our college may have acted in a way that:
- Is inconsistent with the staff code of conduct, including inappropriate conduct outside of work
 - Does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO

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

- Being over friendly with children
- Taking photographs of children on their mobile phone
- Engaging with a child on a one-to-one basis in a secluded area, or behind a closed door
- Using inappropriate sexualised, intimidating or offensive language

3.235 Our training helps staff understand that such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate but might not be in specific circumstances, through to that which is ultimately intended to enable abuse.

3.236 Our procedure for sharing confidentially such concerns as above is clear:

- If low-level concerns are shared initially with the Head of HR or DSL it is a matter for our college to decide appropriate action
- Low-level concerns which are shared about supply staff and contractors will be notified to their employers, so that any potential patterns of inappropriate behaviour can be identified
- If we are in any doubt as to whether the information which has been shared about a member of staff as a low-level concern in fact meets the harm threshold, we will consult with the relevant LADO

3.237 As part of our whole college approach to safeguarding we ensure that we promote an open and transparent culture in which all concerns about all adults working in or on behalf of our college (including supply teachers, volunteers and contractors) are dealt with promptly and appropriately. By creating a culture in which all concerns about adults (including allegations that do not meet the harms threshold are shared responsibly and with the right person, recorded and dealt with appropriately, is critical. When implemented correctly, this will enforce our open and transparent culture; enable us to identify concerning, problematic or inappropriate behaviour early; minimise the risk of abuse; and ensure that adults working in or on behalf of our college are clear about professional boundaries and act within these boundaries, and in accordance with the ethos and values of our college as set out in part one of the policy.

3.238 All low-level concerns will be recorded in writing. The record will include details of the concern, the context in which the concern arose, and action taken. The name of the individual sharing their concerns should also be noted, if the individual wishes to remain anonymous then that will be respected as far as reasonably possible.

3.239 Our records for such level of concern will be kept confidential, held securely and comply with the Data Protection Act 2018 and the UK General Data Protection

Regulation (UK GDPR). This allows for records to be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified.

Whistleblowing

- 3.240 All staff and volunteers are able to raise concerns about poor or unsafe practice and potential failures in our colleges safeguarding regime; concerns are taken seriously by the senior leadership team.
- 3.241 A whistleblowing disclosure must be about something that affects the general public such as:
- A criminal offence has been committed, is being committed or is likely to be committed
 - A legal obligation has been breached
 - There has been a miscarriage of justice
 - The health or safety of any individual has been endangered
 - The environment has been damaged
 - Information about any of the above has been concealed
- 3.242 The NSPCC runs a [whistleblowing helpline](https://www.nspcc.org.uk/help/whistleblowing-helpline/) on behalf of the government. 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 800 5000 – line is available from 8:00 AM to 8:00 PM, Monday to Friday and Email: help@nspcc.org.uk.
- 3.243 For further information please see our Whistleblowing Policy.

4. Procedure

Taking Action

- 4.1 This part of our policy explores what safeguarding is and that it is everyone's responsibility.
- 4.2 It explains the expectations for all staff if they have a concern about a child or adult, including what to do, if staff have concerns about other members of staff.
- 4.3 Professional curiosity is a key factor in this part, as it is dependent on the relationships that staff build with students, and how they observe those shifts in behaviour and attitudes.
- 4.4 This part explains the requirements for recording safeguarding, mental health, and wellbeing concerns in college.

Safeguarding All Students

- 4.5 Safeguarding and promoting the welfare of our students is everyone's responsibility. Everyone who comes into contact with student body has a role to play. To fulfil this responsibility effectively, all professionals should make sure their approach is person-centred. This means that they should consider, always, what is in the best interests of the student.
- 4.6 Safeguarding is promoting the welfare of our students by:
- Protecting them from maltreatment
 - Preventing impairment of mental, emotional, social and physical health or development
 - Ensuring that that home environment is consistent with the provision of safe and effective care
 - Taking action to enable all students to have the best outcomes
- 4.7 Our staff supported to identify concerns early, providing support, and prevent concerns from escalating.
- 4.8 All our staff have a responsibility to provide a safe environment in which our students can learn.
- 4.9 We have a DSL and DDSs who provide support to staff and volunteers to carry out their safeguarding duties and who will liaise closely with other services such as Children's and Adult Services.
- 4.10 We are trained and prepared to identify children who may benefit from support at the earliest point. Families First means we will work with children and families to provide support as early as possible, when an issue is identified at any point in a child's life, from the foundation years through to the teenage years.
- 4.11 Any staff member who has a concern about a student's welfare, mental health, or wellbeing follows the referral processes. Our staff understand they may be required to support social workers and other agencies following any referral, depending on the nature of it.
- 4.12 The Teachers' Standards 2012 state that teachers, including headteachers, should safeguard children's wellbeing and maintain public trust in the teaching profession as part of their professional duties.
- 4.13 Within our 14-16 provision, those students that are commissioned a place at Walsall College whenever a safeguarding concern arises, it will be shared with the College to lead on.
- 4.14 Our 14-16 provision students who are Electively Home Educated (EHE), we will act as main provider and lead on safeguarding concerns.

Dealing with concerns and disclosures

4.15 All staff are trained and aware that:

- A student may disclose something that has upset or harmed them
- Someone else might report something that a student has told them, or that they believe that a student has been or is being harmed
- A student might show signs of physical injury for which there appears to be no explanation
- A student's behaviour, including any observed changes to behaviour 'usual' for that student may suggest he or she is being abused
- The behaviour or attitude of one of the workers towards a student may cause concern
- A student demonstrates worrying behaviour towards others
- A student may display indicators of mental health

4.16 We know that being professionally curious is not simply about asking the question. It is about the language used, creating a trusting relationship, a safe space in which to disclose and giving time to our students, so they do not feel pressured.

4.17 All staff and volunteers are alert to the potential need for early help/referral to the DSL for a student who:

- Disabled and has specific additional needs
- Has special educational needs (whether or not they have a statutory education, health and care plan)
- A young carer
- Showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups
- Frequently missing/goes missing from care or from home
- Misusing drugs or alcohol themselves
- At risk of modern slavery, trafficking or exploitation
- Is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health problems or domestic abuse
- Has returned home to their family from care
- Showing early signs of abuse and/or neglect
- At risk of being radicalised or exploited
- Talking about or spreading misinformation, disinformation and conspiracy theories
- A privately fostered child, or in kinship care

4.18 Our Safeguarding and Wellbeing Team will always discuss concerns with parents or caregivers unless to do so may:

- Place the child at risk of significant harm or further risk of significant harm
- Place a vulnerable adult at risk of harm
- Compromise enquiries that need to be undertaken by Children's or Adult Services or the police

- 4.19 Under no circumstances, will staff leave college without reporting verbally to the safeguarding team or logging a concern as 'urgent' through [MyConcern](#).

Procedure for reporting a safeguarding concern

- 4.20 All concerns for students will be recorded on our safeguarding management information system, [MyConcern](#).
- 4.21 All staff can access [MyConcern](#) from the main Share Point page, by clicking 'report a problem' then selecting 'safeguarding concern' which will take them. Staff responsibilities to report are that:
- All concerns will be recorded as soon as possible
 - All concerns will be triaged by either the DSL and DDSL's, then allocated to a member of the Safeguarding and Wellbeing Team to follow up and action
 - All concerns of significant harm will be referred to the Local Authority Children's of Adult's Services (MASH) without delay
 - All concerns shared will be considered against the relevant borough's Safeguarding Partnership guidance
 - All concerns of allegations in relation to staff and volunteers' harmful behaviour will be logged on [Confide](#) to be triaged by the Head of HR, HR Manager, and DSL

Responding to a disclosure

- 4.22 All staff and volunteers have a statutory duty under the Education Act 2002 to pass on any child protection concerns about the child, as well as concerns regarding vulnerable adults.
- 4.23 When responding to a concern, staff should consider the 6 R's: Response, Receive, Reassure, React, Record, Refer, and Reflect

Receive

- If a child wants to talk to you, ask them what they want to talk to you about and give them the time to speak to you
 - If they begin to avoid you, please refer to Safeguarding and Wellbeing Team who would follow this up
- Never promise confidentiality, inform the child that you are happy to talk to them but if they tell you anything that you believe may be putting them at harm, that you have a duty of care to ensure they receive the right support
- Do not stop a child who is freely recalling information, you can ask for clarity after they have finished downloading

Reassure

- Ensure that the child is aware that they have done the right thing in talking to you and that they have not done anything wrong
- If you have any concerns that the child has been, or is at risk of harm, you must tell them that you will speak to someone to get help, this would be from the Safeguarding and Wellbeing Team

React

- If you need to clarify information, ask open-ended questions, for example:
 - Is there anything you would like to tell me?
 - Can you explain to me...?
 - Can you describe to me...?
- Do not criticise the alleged perpetrator, it may be someone that they will continue to live with
- Never ask the child to repeat their allegation for any other member of staff, it is your responsibility to share the information

Record

- Take notes as soon as possible afterwards using the words that the child has used
- Do not record your assumptions and interpretations, only what you heard or saw
- Do not destroy original notes even if you later write things up more neatly and fully
- Record the date, time and place of the disclosure
- Sign any written records and identify your position in the college setting
- Do not ask a child to write and account or sign any of your documentation, as this may compromise enquiries that need to be made later by Children's Services or Police.

Refer

- Immediately inform the DSL or DDSL for child protection, as well as reporting on [MyConcern](#), for anything Urgent please click the 'Urgent' box as this gets picked up immediately
- For Urgent Safeguarding intervention, please contact 7050 and Security will provide the relevant person with details of abuse

Reflect

- Ask yourself if you have done everything you can within your role
- Refer any remaining concerns to the appropriate staff who come into contact with that child or a close family member
- Dealing with disclosures can be difficult and disturbing; you should seek support for yourself via the support within your college or an alternative source but be aware of principles of confidentiality

4.24 Staff are reminded and trained, that records should include:

- A clear and comprehensive summary of your concern
- Details of how the concern was followed up and resolved
- A note of any action taken
- Any other information that is relevant

4.25 **Personal Development Curriculum**

- 4.26 Our governing body considers how children are taught about safeguarding, including online, through teaching and learning opportunities, as part of providing a broad and balanced curriculum. This may include covering relevant issues through PHSE, SRE, SEAL, SMSC, British Values, online safety, approved visitors etc
- 4.27 Our College makes use of the DfE “one stop” page for teachers on GOV.UK, outlined within. [Teaching about relationships, sex and health](#). This includes teacher training modules on the RSHE topics and non-statutory implementation guidance
- 4.28 We are familiar with the following resources to help us plan and teach about safeguarding: [teaching online safety in schools](#)
- 4.29 UK Council for Internet Safety (UKCIS) guidance [Education for a connected world](#)
- 4.30 UKCIS guidance [Sharing nudes and semi-nudes: advice for education settings working with children and young people](#)
- 4.31 We have an External Speakers and Events policy in place that is guided by UKCIS [external visitors guidance](#) to ensure the maximum impact of any online safety sessions delivered by external visitors.
- 4.32 National Crime Agency's CEOP education programme [ThinkuKnow](#).
- 4.33 [Harmful Online Challenges and Online Hoaxes](#) this includes advice on preparing for any online challenges and hoaxes, sharing information with parents and carers and where to get help and support.
- 4.34 By using the resources above our children are taught to recognise when they are at risk and how to get help when they need it.
- 4.35 We will provide opportunities for students to develop skills, concepts, attitudes and knowledge that promote their safety and well-being.
- 4.36 Relevant issues will be addressed through the curriculum, for example self-esteem, emotional literacy, assertiveness, power, exploitation, sex and relationship education, consent, online safety, British Values, bullying, and sexting.

- 4.37 Our policies address issues of power and potential harm, for example bullying, equal opportunities, physical handling, positive behaviour, online safety, SEND, disabilities and other vulnerabilities and are linked to ensure a whole college approach.
- 4.38 Our safeguarding policy cannot be separated from the general ethos of the College, which will ensure that pupils/students are treated with respect and dignity, taught to treat each other with respect, feel safe, have a voice, and are listened to.

Data Protection and Information Sharing

- 4.39 **“Where possible, share information with consent, and where possible, respect the wishes of those who do not consent to having their information shared. Under the GDPR and Data Protection Act 2018 we may share information without consent if, in our judgement, there is a lawful basis to do so, such as where safety may be at risk.”**
- 4.40 We understand that information sharing is vital in identifying and tackling all forms of abuse and neglect, and in promoting our student’s welfare, including their educational outcomes. We have clear powers to share, hold and use information for these purposes as reflected in our Information Sharing policy and procedure; and privacy notices.
- 4.41 The Data Protection Act 2018 and General Data Protection Regulation (GDPR) places duties on organisations and individuals to process personal information fairly and lawfully and to keep the information they hold safe and secure; this is **not** a barrier to sharing information where the failure to do so would result in a student being placed at risk of harm. Fears about sharing information **will not** be allowed to stand in the way of the need to promote the welfare and protect the safety of our students.
- 4.42 With our 14-16 on-site provision when children leave us for whatever reasons, the DSL will ensure their child protection file is transferred to the new college or college as soon as possible, ensuring secure transit, and confirmation of receipt will be obtained; this will be transferred separately from the main student file. If we are the receiving college, we will ensure key staff such as DSLs and inclusive support are aware.
- 4.43 In our college, we recognise that when a student has a social worker, it is an indicator that they are likely to be more at more at risk than other students.
- 4.44 This may mean that they more vulnerable to further harm, as well as facing educational barriers to attendance, learning, behaviour and poor mental health.
- 4.45 We take these needs into account when making plans to support students who have a social worker.

- 4.46 In Walsall, in addition to their statutory duties, the role of virtual college heads was extended in June 2021, to include a non-statutory responsibility for the strategic oversight of the educational attendance, attainment, and progress of children with a social worker.
- 4.47 In offering advice and information to workforces that have relationships with children with social workers, virtual college heads will identify and engage with key professionals, helping them to understand the role they have in improving outcomes for children.
- 4.48 Non-statutory guidance on promoting the education of children with a social worker contains [further information on the roles and responsibilities of virtual college heads](#).

Responses from Parents

- 4.49 Research and experience indicate that the following responses from caregivers may suggest a cause for concern across all categories of abuse:
- Delay in seeking treatment that is obviously needed
 - Unawareness or denial of any injury, pain or loss of function (for example, a fractured limb)
 - Incompatible explanations offered, several different explanations or the child is said to have acted in a way that is inappropriate to her/his age and development
 - Reluctance to give information or failure to mention other known relevant injuries
 - Frequent presentation of minor injuries
 - A persistently negative attitude towards them
 - Unrealistic expectations or constant complaints about the child
 - Alcohol misuse or other drug/substance misuse
 - Parents request removal of the child from home
 - Violence between adults in the household

Key Processes Family Help – Identifying and Understanding Needs

- 4.50 Our College is committed to following the key features of the Families First approach to enable us to understand and meet children's needs as early as possible, appreciating that it is essential to help parents and carers – it is by doing so they will be able to care for their children as best they can.
- 4.51 Our focus is on developing quality and consistency of relationships, undertaking work to understand needs and get the right help and plans in place, and building networks around families. And are committed to becoming part of Team around the family arrangements.
- 4.52 Our safeguarding and wellbeing team are aware of the Walsall Families First pathway, focusing on getting the right help and support in place at the right time as defined in [Walsall Safeguarding Partnership Right Help, Right Time – Continuum of Need Guidance](#)

- 4.53 Options will therefore include managing any support for the child internally via our College own support processes, family Help assessment or a referral for statutory services, for example as the child might be in need, is in need or suffering or likely to suffer harm.
- 4.54 All staff are prepared and trained to identify students who may benefit from additional support and refer to the safeguarding and wellbeing team. Who will support student and family by understanding the support we're asking for.
- 4.55 This can be either Family Help Universal needs (Level 1), Extra Support needs (Level 2) Targeted Needs, (Level 3) in addition to identifying risks of Multiple/Substantial Needs/Significant Harm (Level 4).
- 4.56 Prior to receiving Family Help, children and families will be supported through universal and early support family services such as Family Hubs, Colleges and education providers, GPs and universal health services as well as the voluntary and community services.
- 4.57 For early support from specialist services such as housing, social care, police and wider services when we require additional support from our multi agency colleagues, we will request a Locality Conversation, accessed:
<https://www.walsallfamilyhubs.co.uk/family-hubs/walsall-family-hubs/families-first-children-partnership-page/our-family#main>
- 4.58 The support provided must also empower families to become resilient over time and build connections to their local community. Our College has attended the Families First Training and follows the pathway as outlined. [Families First for Children - Instruction Manual \(Procedures and Processes\) Final.pdf](#)
- 4.59 If Family Help is appropriate our designated safeguarding lead/deputy will lead/contribute to the Family First Assessment, accessed:
<https://www.walsallfamilyhubs.co.uk/family-hubs/walsall-family-hubs/families-first-children-partnership-page/our-family#main> liaising with external agencies and complete any required requests and/or assessments. Wider College staff may be required to support other agencies and professionals contribute to information gathering and take the role of Family Help Coordinator.
- 4.60 All children and families receiving additional support will be part of the ongoing review process with consideration given to any escalating needs/concerns which may require a referral to Children's Services for assessment for statutory services.
- 4.61 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.

- 4.62 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. This includes all forms of abuse, neglect, and exploitation.
- 4.63 Where a child is suffering, or is likely to suffer from harm, it is important that a referral to local authority children's social care and if appropriate the police is made immediately. Referrals should follow the local referral process. [when-to-call-the-police-guidance-for-schools-and-colleges.pdf \(npcc.police.uk\)](https://www.npcc.police.uk/guidance-for-schools-and-colleges.pdf)
- 4.64 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.
- 4.65 The local authority will make a decision, within one working day of a referral being made, about the type of response that is required and should let the referrer know the outcome, the referrer should follow up if this information is not forthcoming. If, after a referral, the child's situation does not appear to be improving, our College will consider following local escalation procedures ensuring our concerns have been addressed and, most importantly, that the child's situation improves.

Our college procedures for responding to reports of sexual violence and sexual harassment

- 4.66 Our starting point regarding any report will always be that there is a zero-tolerance approach to sexual violence and sexual harassment and it is never acceptable and it will not be tolerated. It is especially important, not to pass off any sexual violence or sexual harassment as 'banter', 'just having a laugh', part of growing up' or 'boys being boys' as this can lead to a culture of unacceptable behaviours and an unsafe environment for children.

Procedures for online abuse

- 4.67 Our procedures for dealing with the concerns are:

- We will **never** view, download or share the imagery, or ask a student to share or download – **this is illegal**
- If we have already viewed the imagery by accident (for example, if a student has showed it to you before you could ask them not to)
- We will **not** delete the imagery or ask the person to delete it
- We will **not** ask the person(s) who are involved in the incident to disclose information regarding the imagery, this is the responsibility of the DSL and DDSL's and/or our statutory partners
- We will **not** share information about the incident to other members of staff, the person(s) it involves or their, or other, parents and/or carers unless advised by the DSL and/or our statutory partners to do so
- We will **not** say or do anything to blame or shame any people involved. We will recognise the importance of understanding intra familial harms and any necessary support for siblings following incident
- We **will** explain to them that you need to report it and reassure them that they will receive support and help from the DSL

Confidentiality

- 4.68 As a matter of effective safeguarding practice, we will do all we reasonably can to protect the anonymity of any students involved in any report of sexual violence or sexual harassment. Amongst other things, this will mean carefully considering, based on the nature of the report, which staff should know about the report and any support that will be put in place for the children involved. We will also consider the potential impact of social media in facilitating the spreading of rumours and exposing victims' identities, if required we will provide a physical space for victims to withdraw.

Risk assessment

- 4.69 When there has been a report of sexual violence our DSL or DDSL will make an immediate risk and needs assessment, in collaboration with other colleagues that support the students. Where there has been a report of sexual harassment, the need for a risk assessment will be considered on a case-by-case basis.
- 4.70 The risk and needs assessment consider:
- The victim, especially their protection and support
 - Whether there may have been other victims
 - The alleged perpetrator(s)
 - All other members of the community
- 4.71 Risk assessments will be recorded and be kept under review, at all times we will be actively considering the risks posed to all members of our community and put adequate measures in place to protect them and keep them safe.
- 4.72 Where there has been a report of sexual violence, it is likely that professional risk assessments by social workers and or sexual violence specialists will be required also.

- 4.73 The wishes of the victim, the nature of the allegations and the protection of all children in college will be especially important when considering any immediate actions such as teaching timetables, break times and travelling to and from college.

Internal Decision Making and Referrals to other agencies

- 4.74 In some cases of sexual harassment, we may take the view that the student concerned are not in any need of early help or require referrals to be made to statutory services and that it would be appropriate to handle the incident internally, perhaps through utilising our student support policies and as well as further support from the Safeguarding and Wellbeing Team.
- 4.75 All concerns, discussions, decisions and reasons will be recorded on [MyConcern](#), and shared with relevant agencies.
- 4.76 We may decide that the student involved does not require referral to statutory services but may benefit from early help, meaning providing support as soon as a problem emerges, at any point in a child's life. Providing early help is more effective in promoting the welfare of our students than reacting later. Early help can be particularly useful to address non-violent HSB and may prevent escalation of sexual violence.
- 4.77 Early help and the option to manage a report internally do not need to be mutually exclusive: college may manage internally and seek early help for both the victim and perpetrator.
- 4.78 Where a student has been harmed, is at risk of harm, or is in immediate danger we will make a referral to Children's or Adult's Services.
- 4.79 At the point of referral, we will generally inform parents or carers, or caregivers if necessary, unless there are compelling reasons not to, if informing them is going to put the student at additional risk. Any such decision will be made with the support of Children's or Adult's Services.
- 4.80 Where statutory assessments are appropriate, we will work alongside, and cooperate with, the relevant lead social worker. Collaborative working will help ensure the best possible package of coordinated support is implemented for the victim and, where appropriate, the alleged perpetrator and any other person that require support.
- 4.81 We will not wait for the outcome, or even the start, of a Children's or Adult Services investigation before protecting the victim and other children in college. It is important for our college to work closely with Children's and Adult Services, and other agencies as required, to ensure any actions we take do not jeopardise a statutory investigation.

- 4.82 In some cases, Children's Services will review the evidence and decide a statutory intervention is not appropriate. We will be prepared to refer again if we believe the child remains in immediate danger or at risk of harm, referring to the [escalation policy](#) if still not in agreement with the decision.
- 4.83 Where a report of rape, assault by penetration or sexual assault is made, the starting principle is that we will refer on to the police.
- 4.84 Referrals to the police will often be a natural progression of making a referral to Children's or Adult Services. The police will consider what action to take to manage the assessed risk of harm. This could involve the use of police bail with conditions, prior to a suspect appearing in court, or court bail with or without conditions after the first appearance.
- 4.85 Alternatively, the person suspected of an offence could be 'released under investigation' (RUI). People released under RUI can have no conditions attached to their release from custody and it is possible for a person on bail also to have no conditions.
- 4.86 Whatever arrangements are in place we will consider what additional measures may be necessary to manage any assessed risk of harm that may arise.
- 4.87 Any students that are under investigation, have an ongoing investigation, or conviction must disclose this via our [criminal convictions disclosure form](#).
- 4.88 We may make a referral to Child Exploitation and Online Protection (CEOP) which is a law enforcement agency which aims to keep children and young people safe from sexual exploitation and abuse. Online sexual abuse can be reported on their website and a report to one of their Child Protection Advisors will occur.

Referrals to Children's Services

- 4.89 Where a child has been harmed, is at risk of harm, or is in immediate danger we will make a referral to Children's Services.
- 4.90 At the point of referral to Children's Services we will generally inform parents or carers, unless there are compelling reasons not to (if informing a parent or carer is going to put the child at additional risk). Any such decision will be made with the support of Children's Services.
- 4.91 If a referral is made Children's Services will then make enquiries to determine whether any of the children involved are in need of protection or other services.

- 4.92 Where statutory assessments are appropriate, we will work alongside, and cooperate with, the relevant lead social worker. Collaborative working will help ensure the best possible package of coordinated support is implemented for the victim and, where appropriate, the alleged perpetrator(s) and any other children that require support.
- 4.93 We will not wait for the outcome (or even the start) of a Children's Services investigation before protecting the victim and other children in College. It is important for our College to work closely with Children's Services (and other agencies as required) to ensure any actions we take do not jeopardise a statutory investigation.
- 4.94 In some cases, Children's Services will review the evidence and decide a statutory intervention is not appropriate. We will be prepared to refer again if we believe the child remains in immediate danger or at risk of harm, referring to [FaST](#): Finding a Solution Together if still not in agreement with the decision.
- 4.95 If a statutory assessment is not appropriate, we will consider other support mechanisms such as early help, specialist support and wellbeing support. All concerns, discussions, decisions, and reasons for decisions will be recorded.

5. Related Policies and Procedures

- 5.1 This policy will be read and referenced alongside other policies:

- Attendance Policy
- Student Support Policy
- Equality, Diversity, Inclusion, and Belonging Policy and Procedure
- Criminal Convictions Policy and Procedure
- Risk and Vulnerability Policy and Procedure
- Safer Recruitment Policy
- Staff Code of Conduct
- Online Safety Policy
- SEND Policy
- Personal Development Strategy
- Whistleblowing Policy

6. Appendix One

EMPLOYERS INFORMATION FOR SAFEGUARDING AND WELLBEING OUR STUDENTS

Reporting Procedures For Employers We Work With

walsallcollege.ac.uk

INTRODUCTION

Employers, placement, and training providers have a duty to safeguard and protect people whilst in the workplace. We are committed to providing a safe environment for our students and want to ensure that this safety is mirrored in the workplace. Employers must take steps to ensure young people and vulnerable adults are always safe whilst on their premises and under their care.

Walsall College is committed to ensuring that all of our students should live free from abuse, exploitation and neglect. We believe that every student is deserving of an environment that is supportive, caring, and nurturing for them to be able to flourish and thrive. This is for **all of our students**, whether they are a child or an adult.

WHAT IS SAFEGUARDING?

Our view of safeguarding is that “**it could happen here**” and we have the interest of the students as our priority. As a College, we promote safety and wellbeing of our students whilst being aware of indicators of abuse, exploitation, and neglect.

We understand that children and adults can be at risk inside and outside of home, college, and online. When children is referenced it means those under the age of 18 years in line with the legal definition and adults over that age of 18 years.

DEFINING HARM

ABUSE can take many forms, including:

- Physical which may involve hitting, shaking, throwing, poisoning, burning, scalding, drowning, suffocating or otherwise causing physical harm
- Emotional abuse is emotional mistreatment of others, it is sometimes referred to as psychological abuse. It can involve behaviours that deliberately trying to scare, humiliate, isolate, or ignore a child
- Sexual abuse is defined as any unwanted sexual behaviour that takes place with or without consent, and can be physical, psychological, verbal, or online. It can also include sexual relations with a child, regardless of the context

NEGLECT is the ongoing failure to meet a person’s basic needs, which can put them in danger and have long-term effects on their health and wellbeing. Neglect is the most common form of child abuse. Some examples of neglect include:

- Provide adequate food, clothing and shelter (including exclusion from home or abandonment)
- Protect a child from physical and emotional harm or danger
- Ensure adequate supervision (including the use of inadequate care-givers)
- Ensure access to appropriate medical care or treatment
- It may also include neglect of, or unresponsiveness to basic emotional needs

EXPLOITATION is the deliberate abuse of power or control over another person, usually for personal gain. It can take many forms, including:

- Modern slavery: Victims may be injured, malnourished, unkempt, under the control of others
- Sexual exploitation: Victims may be groomed with gifts, money, drugs, status, and affection in exchange for performing sexual activities
- Criminal exploitation: Victims may be groomed with gifts, money, drugs, status, and affection in exchange for carrying out a criminal activity
- County lines: Victims are often exploited to move and store drugs and money for criminals from larger cities

HOW EMPLOYERS HELP KEEP OUR STUDENTS SAFE

It is equally important to us those employers we work with understand and embrace their responsibility in keeping our student's safe. We want employers to feel confident in sharing that they may have noticed a change in behaviour, or have had a disclosure that may indicate abuse, neglect, exploitation, mental health, or wellbeing and share this information with our dedicated Safeguarding and Wellbeing Team.

Students may share this with you directly, or it may manifest into visible signs of harm such as:

- Unexplained injuries or inconsistent narrative regarding how they received the injuries
- Aggressive, irritable, or agitated in their interactions with others
- Arriving to work suspected to be under the influence of alcohol or drugs
- Self-harm, suicide ideation, or suicide attempt
- Difficulty concentrating or remaining focused on a task
- Emotional dysregulated
- Withdrawn, avoiding and shutting down to others
- Not turning up for work without explanation or starting to show up for work late
- A reluctance to go home

If you identify any signs which indicate concerns, they must be reported. **If you are unsure, worried, or concerned please report it.** All the small stuff adds up and that is why it is so important that we are dynamic and joined up in our approach to safeguarding.

PREVENT DUTY

In the Counter-Terrorism and Security Act 2015, the Prevent Strategy is defined as “preventing people from being drawn into terrorism”.

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

- Work with sectors and institutions where there are risks of radicalisation that we need to address

We are aware that people can be drawn into extremist ideology and be drawn into radicalisation. This can happen in both a physical or online network. Similar to protecting children and adults from other forms of harm, protecting others from this risk is an important part of our College's safeguarding strategy.

RECOGNISING EXTREMISM

Indicators of radicalisation or extremism (both online and in-person):

- Showing support for extremist causes
- Glorifying violence, especially to other faiths or cultures
- Making remarks or comments about being at extremist events
- Evidence of possessing illegal or extremist literature
- Advocating messages similar to illegal organisations or other extremist groups
- Out of character changes in dress, behaviour and relationships
- Secretive behaviour and changes in overall demeanour
- Online searches or sharing extremist messages or social profiles
- Intolerance of difference, including faith, culture, gender, race or sexuality
- Graffiti, art work or writing that displays extremist themes
- Attempts to impose extremist views or practices on others
- Advocating violence towards others
- Isolating themselves from family and friends
- Talking as if from a scripted speech
- Unwillingness or inability to discuss their views
- Sudden disrespectful attitude towards others
- Increased levels of anger
- Increased secretiveness, especially around internet use
- Owning extremist literature
- Vocalising extremist views/celebrating violence.

THE JOURNEY OF RADICALISATION

Radicalisation is the term used to describe the process where an individual becomes involved with or starts to support groups or ideologies with extremist beliefs. Those who become radicalised often end up getting drawn into serious abuse, which is why radicalisation is classed as a form of harm.

Being aware of how young people can be vulnerable to radicalisation from groups or organisations with extreme beliefs is important for anyone who has a safeguarding responsibility.

There are a variety of ways in which radicalisation can take place:

- Grooming, either online or in-person from a member of an extremist group looking to indoctrinate vulnerable individuals into their belief system
- Exposure to material or information that is inappropriate and can have a harmful impact, such as violent and aggressive imagery that encourages similar behaviour
- Psychological manipulation that encourages certain behaviours and punishes others, that the individual being radicalised starts to conform and aligns thinking, behaviour, and actions with the rest of the group

ROLES AND RESPONSIBILITIES OF EMPLOYERS AND THEIR EMPLOYEES

It would be neglecting our responsibilities, assuming that any sign or information relating to the safeguarding or wellbeing of our students is ‘trivial’ or that it is ‘none of their business’ or ‘someone else will sort it out’. If a student discloses any information that they are being harmed, or gives cause to a suspicion of harm then this should be reported in line with the College guidance. We have a proactive and solution-focused safeguarding and wellbeing team that will respond to any information we receive.

The following roles outline the key responsibilities for reporting safeguarding concerns:

- An employer should ensure that their employees understand how to report safeguarding and wellbeing concerns
- The Employer should never promise confidentiality to the young person or vulnerable adult and should advise them that they will be sharing their concerns with the College
- Any information received by a member of staff, no matter how small or insignificant it may seem, must be regarded as the highest priority, and reported by a phone call or using the [reporting concerns form](#)
- A member of the Safeguarding and Wellbeing team will take the appropriate action and involve any third-party organisations deemed necessary
 - All serious cases will be reported to the Police or Social Services, who will log the report and make further investigations, these may involve direct contact with the employer
 - Walsall College will keep the employer informed of any developments where appropriate

PROCEDURE FOR REPORTING ANY CONCERNS

8:30AM – 5PM

In the event of an emergency, can you please contact 07311398629 or 01922657000 and ask for urgent safeguarding support

If the issue is not an emergency, can you please scan the QR below or click on this [link](#), and complete the form. Please leave as much information as you can, even if you are not sure if it's relevant. We thank you for whatever information is shared and will treat it sensitively.

Out of hours

In the event of an emergency, please contact the student's named emergency contact. If unavailable, then please contact local police in emergency 999 or non-emergency 101. For social services, you would consult within the local authority in which the person lives, please refer to the duty manager. **Other helpful contact numbers are** Crimestoppers - 0800 555 111 and National Anti-Terrorism hotline 0800 789 321.

