Safeguarding & Prevent Policy and Procedure

Policy name:	**Safeguarding & Prevent Policy**
Policy reference:	**Pol-SG-CB**
Created by:	**Vice Principal of Student Support and Inclusion**
Approved by:	**Principal & the Governing Body**
Date of last review:	**July 2026**
Date of next review:	**November 2027**
Revision number:	**29**

This document is available in other formats including audio, Braille and other languages. The same applies to all material which is referenced within in it. For further assistance, please contact the Quality Department on 01925 494645 or email quality@wvr.ac.uk

Contents

1. Purpose 3
2. Scope 3
3. Responsibility 4
4. General Principles 4
5. Roles and Responsibilities 6
6. Definitions of child or adult at risk, abuse, neglect and exploitation 9
7. Safeguarding issues 11
8. Additional forms of abuse relevant to adult at risk 16
9. Procedure 16
10. Sexual violence and sexual harassment between children in college
10. Reporting and Dealing with Allegations of Abuse against Members of Staff 30
11. Recruitment and Selection Procedures 31
12. Responsibilities of College Staff 36
13. Online Safety 32
14. Educational Visits and Work Placements 33
15. Bullying and Harassment 40
16. Supporting Vulnerable/at risk Learners 35
17. Safeguarding 14-16 Students 42
18. Visitors and Contractors 43
19. Curriculum 37
20. Safeguarding Information for Learners 37
21. Partnership with Parents/Carers 44
22. Children who are lesbian, gay or bisexual
Confidentiality 38
23. Written Records 38
24. Legislation and Guidance 39
Appendix A – DFE Part One: Keeping Children Safe in Education 2026 44
Appendix B - Radicalisation & PREVENT Strategy 62
Appendix C - Keeping Apprentices Safe 64

1. Purpose

Safeguarding and promoting the welfare of children is **everyone's** responsibility. Everyone who comes into contact with children and their families and carers has a role to play in safeguarding children. In order to fulfil this responsibility effectively, all professionals should make sure their approach is child-centred. This means that they should consider, at all times, what is in the **best interests** of the child.[1]

The purpose of the Safeguarding Policy and Procedure and related training are to ensure the college provides a safe learning environment for children, young people and adults at risk. The college is committed to:

a. Raising the awareness and identification of children or adults at risk who are at risk of significant harm and providing clear procedures for reporting concerns.

b. Raising the awareness of young people and adults at risk, including the importance of staying safe on-line.

c. Raising awareness of the Prevent duty and identification of children or adults at risk of radicalisation and utilising the safeguarding procedures for reporting concerns.

d. Establishing procedures for reporting and dealing with allegations of abuse against members of staff.

e. The safe recruitment of staff.

2. Scope

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

This policy and procedure applies to all College staff, whether teaching, administrative, management or support, as well as to volunteers. The word "staff" is used to denote all these groups.

College staff will follow the guidance outlined in the Safeguarding Policy and Procedure.

The College has a statutory and moral duty to promote and safeguard the welfare of all our students under the age of 18 and adults at risk receiving education and training at the college. This includes protecting them from situations where they may be abused. The college will ensure that all staff understand that children and young people may not feel ready or know how to tell someone that they are being abused, exploited or neglected or may not recognise their experiences as harmful

The policy applies to all students under the age of 18 years of age, all adults at risk, all students over the age of 18 where there are minors in the household and abuse, neglect or exploitation is disclosed and all staff without exception. The policy is also applied to all visitors and contractors to the college. The policy applies to all college sites and community venues.

[1] DfE Keeping children safe in education September 2026

3. Responsibility

The policy ensures all disclosures are referred to the Designated Safeguarding Officers, where they will be acted upon accordingly.

Operational responsibility for the implementation of the policy lies with the Vice Principal: Quality & MIS. This policy will be monitored by the Executive Leadership Team (ELT) and the Vice Principal: Quality & MIS at appropriate intervals and will be reviewed on a regular basis.

Any changes or addendums in response to changes in year will be agreed by ELT and the governing body and shared with staff and via the college website.

The Safeguarding Team will meet fortnightly as a minimum to discuss any issues, and update on individual learners, and where appropriate updates from Channel Panel meetings including the Prevent strategy and local pertinent information available to the college.

The Principal has overall responsibility for Safeguarding.

4. General Principles

4.1 The College recognises that it has a statutory obligation under the Children Act 1989, the Children Act 2004, section 175 Education Act 2002, section 55 of the Borders, Citizenship and Immigration Act 2009, Working Together to Safeguard Children 2026 and Keeping Children Safe in Education Sept 2026, to safeguard and promote the welfare of its individuals. This document offers guidance and outlines procedures that should be followed in all cases of suspected abuse and situations of serious risk. It applies to all individuals under the age of 18 or those over 18 who are considered to be “adults at risk”. Adults at risk are people aged over 18 who are affected by mental ill health, have a learning difficulty or disability, or a physical disability or impairment.

4.2 Safeguarding and promoting the welfare of children 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 taking action to enable all children to have the best outcomes.

4.3 In relation to adults at risk the government set out key principles in The Care Act 2014 (Chapter 14).

4.4 The College also recognises its responsibility to safeguard children and adults at risk in the wider community. For instance, if an individual has younger siblings or an adult at risk within their family.

4.5 This policy applies to all “children” i.e. young persons under the age of 18 years or those over 18 considered to be an adult at risk.

4.6 The welfare of the child/student is, at all times, of paramount importance, irrespective of where any harm takes place.

The college is committed to ensuring that we:

a. Provide a safe environment to learn, onsite and remotely, for children, young people and adults at risk.

b. Identify children, young people and adults at risk who may benefit from early help. Ensure the appropriate staff and/or external agencies are involved in an early help assessment.

c. Are alert to the need for early help for a child who:
   • is frequently missing/goes missing from education, home or care
   • has experienced multiple suspensions, is at risk of being permanently excluded from schools, colleges and in alternative provision or a pupil referral unit
   • has a parent or carer in custody or is affected by parental offending

d. Identify children, young people and adults at risk who are suffering, or likely to suffer significant harm, and take appropriate action to see that such children, young people and adults at risk are kept safe, both at home, in the workplace and at the college.

e. Identify children, young people and adults who have been, or likely to be, radicalised and take appropriate action.

f. Establish clear procedures for reporting and dealing with allegations of abuse, neglect an exploitation.

g. Establish a clear training schedule to ensure all staff are trained and familiar with the Safeguarding Policy and Procedures.

h. Provide appropriate support to students who have been abused, neglected or exploited. For example, signposting them appropriately to external services for specialist support.

i. Establish clear procedures for reporting and dealing with allegations of abuse against members of staff.

j. Establish the safe recruitment of staff (including volunteers) in compliance with the Disclosure and Barring Service (DBS) regulations, including DBS checks and additional barring checks to ensure that staff are not prohibited from teaching as well as obtaining and checking of references and identity checks.

k. Ensure all staff who work for The College are made aware during induction, of the Sexual Offences Act 2003 and that it is an offence for a person over the age of 18 to have a relationship with a child under the age of 18 where that person is in a position of trust in respect of that child, even if the relationship is consensual. This applies where the child is in full-time education and the person works at the same establishment as the child, even if he/she does not teach the child.

l. Ensure all staff who work for the college receive appropriate safeguarding and child protection training (including online safety which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring) at induction. The training is regularly updated and will be delivered annually. In addition, staff receive safeguarding and child protection (including online safety) updates (by email,

Safeguarding & Prevent Bulletin, CPD and staff meetings), as required.

m. If children do not require the support of statutory children's services, designated members of the team, will generally lead on liaising with other agencies and setting up an inter-agency assessment as appropriate. Staff may be required to support other agencies and professionals in carrying out this assessment, in some cases acting as the lead practitioner

In developing the Safeguarding Policy, the college have consulted with and taken into account, guidance issued by the Department for Education (DfE), the NSPCC, CEOP, UK Council for Internet Safety (UKCIS) the Cheshire West and Chester and Warrington Local Safeguarding Partnerships, Cheshire Police, including Counter Terrorism and Prevent, CSE Co-ordinators, The Office for Students (OfS) and Social Care.

The college will refer concerns that a child, young person or adult at risk is at risk of significant harm to Social Care and/or the Police.

5. Roles and Responsibilities

5.1 Designated Staff with Responsibility for Child Protection

The governing body will appoint a governor with special responsibility for child protection/adult at risk issues. He/she will undertake appropriate training with Social Services and other external agencies as appropriate.

There will be a member of the Senior Leadership Team, with lead responsibility for child protection and adult at risk protection who reports to the Principal. The designated member of staff with lead responsibility for child protection and adult at risk protection is the Vice Principal: Quality & MIS, assisted by, the Deputy Safeguarding Leads Safeguarding and Inclusion Mangers) and Welfare Officers. All Designated Safeguarding Officers will be required to update their Local Safeguarding Partnership training every 2 years.

All staff undergo safeguarding and child protection training at induction; all staff receive training annually to ensure they are equipped with the skills and knowledge to safeguard children effectively. Refresher and update training takes place throughout the year if appropriate.

The governing body and the Executive Leadership Team (ELT) will receive on a termly and annual basis, a report on safeguarding issues and duties discharged (as well as a monthly report to SLT). The designated member of staff with lead responsibility for child protection and adults at risk protection is responsible for reporting deficiencies in procedure or policy identified by the Local Safeguarding Partnership (or others) to the governing body at the earliest opportunity.

5.2 Designated Member of Staff with Lead Responsibility

The Vice Principal; Quality and MIS has the lead responsibility for safeguarding and child protection and has a key duty to take lead responsibility for raising awareness with staff of issues relating to the welfare of children and young people, and the promotion of a safe environment for the children and young people learning within the College.

The Vice Principal; Quality and MIS has received training in child protection and safeguarding adults at risk issues and inter-agency working, as required by the Local Safeguarding Partnerships. The Vice Principal; Quality and MIS and wider team will receive refresher training at least every 2 years as well as regularly monitoring developments surrounding safeguarding and child protection.

The Designated Safeguarding Lead is responsible for:

a. Overseeing the referral of cases of suspected abuse or allegations to Social Care.
b. Identifying deputy designated safeguarding leads and ensure they are appropriately trained.
c. Ensuring during term time the designated safeguarding lead and or a deputy is available in College to discuss safeguarding concerns.
d. Ensuring that adequate and appropriate cover is available for out of hours/out of term activities.
e. Providing advice and support to other staff on issues relating to child protection.
f. Maintaining a proper record of any child protection referral, complaint or concern, even where that concern does not lead to a referral (see section 16 Confidentiality and section 17 Written Records).
g. Liaising with the Principal and Governors in relation to ongoing enquiries under Section 47 of the Children Act 1989 and police investigations.
h. Ensuring that parents of children and young people within the College are aware of the College's Safeguarding Policy.
i. Liaising with the relevant local authority, and other appropriate agencies.
j. Liaising with secondary schools which send pupils to the College to ensure that appropriate arrangements are made for the pupils.
k. Liaising with other colleges when a learner leaves to join another college to ensure their child protection file is transferred to the new college as soon as possible, ensuring secure transit, and confirmation of receipt.
l. Liaising with employers and training organisations that receive children or young people from the College on long term placements or employ learners as part of their apprenticeship to ensure that appropriate safeguards are put in place.
m. Ensuring that staff receive appropriate training in child protection issues and the Prevent Duty and are aware of the related College procedures.
n. Ensuring that all governors and trustees receive safeguarding and child protection training at induction which is updated on a regular basis.

5.3 Designated Staff Members

Other designated members of staff with responsibility for safeguarding issues are the, Safeguarding and Inclusion Managers, and Welfare Officers.

These designated staff members:

a. Report to the senior member of staff with lead responsibility
b. Will know how to make an appropriate referral
c. Will ensure that all referrals to Social Care / Police will be made verbally and/or via the appropriate referral form as directed by the Local Safeguarding Partnership.
d. Will be available to provide advice and support to other staff on issues relating to child protection
e. Have particular responsibility to be available to listen to children and young people and adults at risk studying at the College
f. Will deal with individual cases, including attending case conferences and review meetings as appropriate.
g. Have received training in child protection issues and inter-agency working, as required by the Local Safeguarding Partnership, and will receive refresher training at least every 2 years.
h. Will ensure that all referrals, complaints or concerns remain confidential (see section 16 Confidentiality and section 17 Written Records)
i. Review reports and findings from online filtering and monitoring systems and follow up where appropriate
j. If children do not require the support of statutory children's services, the designated safeguarding lead or a deputy, will generally lead on liaising with other agencies and setting up an inter-agency assessment as appropriate. Staff may be required to support other agencies and professionals in carrying out this assessment, in some cases acting as the lead practitioner.

5.4 Designated Governor

The designated governor is responsible for liaising with the Principal and the Designated Safeguarding Lead with lead responsibility over matters regarding child and adult at risk protection, including:

a. Ensuring that the College has procedures and policies which are consistent with the Local Safeguarding Partnership's (Social Care) procedures
b. Ensuring that the governing body considers the College policy on safeguarding each year
c. Ensuring that each year the governing body is informed of how the College and its staff have complied with the policy, including but not limited to a report on the training that staff have undertaken.

The designated governor is responsible for overseeing the liaison between agencies such as the police, social services in connection with allegations against the Principal. This will not involve undertaking any form of investigation, but will ensure good communication between the parties and provide information to assist enquiries. To assist in these duties, the designated governor shall receive appropriate training.

5.5 The Governing Body

The Governing Body should ensure that:

- The college has appropriate policies and procedures in place in order for appropriate action to be taken in a timely manner to safeguard and promote children's welfare. This includes an effective child protection and safeguarding policy and a code of conduct written in accordance with local authority guidance and locally agreed inter-agency procedures. The policy is provided to all staff, including temporary staff and volunteers, and is made available to parents on request
- Appropriate safeguarding responses are in place for children who demonstrate unexplainable and/or persistent absences from education, particularly on repeat occasions in order to identify the risk of abuse, neglect and exploitation and to prevent the risks of their going missing in the future
- The college operates safe recruitment procedures and makes sure that all appropriate checks are carried out on staff and volunteers who work with children
- The college has procedures for dealing with allegations of abuse against staff and volunteers that comply with guidance from the local authority and locally agreed inter-agency procedures
- A senior member of the college's SLT is designated to take overall responsibility for safeguarding and that this person has the necessary training and experience to undertake this role
- Staff undertake appropriate safeguarding training
- They remedy, without delay, any deficiencies or weaknesses regarding safeguarding arrangements
- A designated governor for safeguarding is appointed.
- An identified member of staff has responsibility for monitoring the achievement and personal circumstances of students who are in local authority care
- Where services or activities are provided on the college premises by another body, the body concerned has appropriate policies and procedures in place in regard to safeguarding and liaises with the college on these matters where appropriate
- They review their policies and procedures annually
- All policies and procedures take into account the statutory guidance outlined in "Keeping children safe in education: statutory guidance for schools and colleges" DfE, September 2026 and "Working together to safeguard children" HM Government, December 2026.

A safeguarding update is submitted to Governors each term. An annual report is produced to ensure that Governors have an overview of safeguarding activities undertaken during the year and approve areas for development.

The Safeguarding & Prevent Committee

The Safeguarding & Prevent Committee meets termly to address issues such as safeguarding policy/procedure, staff training programme, student activities, maintaining outstanding safeguarding and other relevant issues. Members of the Committee are the Principal, Vice Principal; Quality and MIS, Director of Human Resources, Director of IT Services, Safeguarding and Inclusion Managers, Health & Safety Officer, Curriculum, pastoral and learning support representatives, The Designated Governor is also invited to attend.

6. Definitions of child or adult at risk, abuse, neglect, exploitation and modern slavery

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
- promoting the upbringing of children with their birth parents, or otherwise their family network[4] through a kinship care arrangement, whenever possible and where this is in the best interests of the children
- 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[2].

Child protection is part of safeguarding and promoting the welfare of children and is defined as activity that is undertaken to protect specific children who are suspected to be suffering, or likely to suffer, significant harm. This includes harm that occurs inside or outside the home, including online.

Effective safeguarding means practitioners should understand and be sensitive to factors, including economic and social circumstances and ethnicity, which can impact children and families' lives.

Abuse: a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children

[2] Children's Social Care National Framework Working Together to Safeguard Children 2023

All staff are made aware that abuse, neglect and safeguarding issues are rarely stand-alone events that can be covered by one definition or label. In most cases multiple issues will overlap with one another.

The College recognises the following as definitions of abuse:

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

Extra familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual abuse (including harassment and exploitation), domestic abuse in their own intimate relationships (teenage relationship abuse - including physical, sexual, emotional abuse, and stalking), criminal exploitation (including financial exploitation), serious youth violence, county lines and radicalisation.

6.2 Emotional abuse: the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include verbal abuse, such as persistent criticism, belittling, or name-calling, as well as not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning or preventing the child 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

6.3 Sexual abuse: involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue (also known as peer on peer abuse) and all staff should be aware of it and of their school or college's policy and procedures for dealing with it.

6.4 Neglect: the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy, for example, as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or

carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

7. Safeguarding issues

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 and/or alcohol misuse, unexplainable and/or persistent absences from education, serious violence (including that linked to county lines), radicalisation and consensual and non-consensual sharing of self-generated intimate images and/or videos including those generated using AI e.g. deepfakes can be signs that children are at risk.

Below are some safeguarding issues all staff should be aware of.

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. UKCIS provides detailed advice about self-generated intimate images and/or videos including those generated using AI e.g. deepfakes.

Both CSE and CCE are forms of abuse that occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in sexual or criminal activity, in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. CSE and CCE can affect children, both male and female and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation.

7.1 Child Criminal Exploitation (CCE)

Some specific forms of CCE can include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting or pickpocketing. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others.
This can be committed or facilitated by an organised network or gang, and the victim may identify as being part of this group.

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

It is important to note that the experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however

professionals should be aware that girls are at risk of criminal exploitation too. It is also important to note that both boys and girls being criminally exploited may be at higher risk of sexual exploitation. Further information about CCE including definitions and indicators is included in Annex B.

7.2 Child Sexual Exploitation (CSE)

CSE is a form of child sexual abuse. Sexual abuse may involve physical contact, including assault by penetration (for example, rape or oral sex) or nonpenetrative acts such as masturbation, kissing, rubbing, and touching outside clothing. It may include noncontact 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.

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

CSE can affect any child, who has been coerced into engaging in sexual activities. This includes 16- and 17-year-olds who can legally consent to have sex. Some children may not realise they are being exploited e.g. they believe they are in a genuine romantic relationship. This can be committed by an individual or an organised network13 and most sexual abuse is committed by those previously known to the victim.

7.3 Female Genital Mutilation (FGM)

Whilst all staff should speak to the designated safeguarding lead (or deputy) with regard to any concerns about female genital mutilation (FGM), there is a specific legal duty on teachers. If a teacher, in the course of their work in the profession, discovers that an act of FGM appears to have been carried out on a girl under the age of 18, the teacher must report this to the police. See Annex B for further details.

7.4 Mental Health

All staff are made aware that mental health problems can, in some cases, develop into safeguarding concerns. This could include self-harm, suicidal ideation or risk of suicide. They could also be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. College staff, however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.

If a child is struggling with their mental health, self-harming, has an eating disorder or is experiencing suicidal ideation and making plans to end their life, there are likely to be potential warning signs which education staff are well placed to recognise. These could include:

- significant changes in behaviour
- ongoing difficulty sleeping

- withdrawing from social situations
- not wanting to do things they usually like, and
- physical signs of self-harm or neglecting themselves

Not every child who exhibits these behaviours is suicidal or has a mental health concern. However, college staff are well placed to identify these and other potential warning signs. In doing so they can identify children who may be struggling with their mental health and contemplating suicide and offer support and vital early intervention.

If staff have a concern about a child's mental health that is also a safeguarding concern, they should contact the safeguarding team as soon as possible. If staff feel that a child is in immediate danger or they are unable to contact a member of the team, they should call 999 or make arrangements to take them to A&E immediately.

If a child needs help urgently for their mental health, but it's not an emergency, staff can get help from NHS 111 online or call 111 and select the mental health option.

7.5 Child on Child Abuse

All staff should be aware that children can abuse other children (often referred to as peer on peer abuse). And that it can happen both inside and outside of college and online. It is important that all staff recognise the indicators and signs of peer on peer abuse and know how to identify it and respond to reports.
All staff should understand, that even if there are no reports in the college it does not mean it is not happening, it may be the case that it is just not being reported. As such it is important if staff have any concerns regarding child on child abuse they should speak to the safeguarding team.

It is essential that all staff understand the importance of challenging inappropriate behaviours between peers, many of which are listed below, that are actually abusive in nature. Downplaying certain behaviours, for example dismissing sexual harassment as "just banter", "just having a laugh", "part of growing up" or "boys being boys" can lead to a culture of unacceptable behaviours, an unsafe environment for children and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it.

All staff should be aware that child-on-child abuse is a safeguarding issue for both the victim and alleged perpetrator

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

- Bullying (including cyberbullying, prejudice-based and discriminatory bullying);
- Abuse in intimate personal relationships between peers;
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse);
- Serious physical assault and harm, or the threat of harm with a weapon
- Sexual violence, such as rape, assault by penetration and sexual assault; (this may include an online element which facilitates, threatens and/or encourages sexual violence); For further information about sexual violence see Annex B.15

- Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse;
- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party;
- Consensual and non-consensual sharing of nudes and semi nudes images and or videos13 (also known as sexting or youth produced sexual imagery);
- Upskirting,14 which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm; and
- Initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

All staff should be clear as to the college's policy and procedures with regards to child on child abuse and the important role they have to play in preventing it and responding where they believe a child may be at risk from it.

7.6 Serious violence

Serious violence is a continuing safeguarding concern. It may involve physical assault, carrying, threatening with, or using weapons, often in the context of peer conflict or bullying, and it can also be associated with criminal exploitation. Staff should report any concerns about a child carrying or using a weapon (or expressing intent to do so) to the safeguarding team as soon as is possible, who will assess the risk and take appropriate action. Where relevant this will include any action needed to de-escalate peer conflict.

College plays a key role in protecting children from violence, safeguarding victims, as well as those who may be at risk of, or are involved in violence (who may also be victims themselves). Staff should be alert to signs that a child may be at risk of or involved in serious violence. These risks are higher for children with disrupted education (e.g. suspensions, permanent exclusions, time in alternative provision) or a history of offending. College should also try to be alert to when children might be at highest risk around the school day (for example immediately after school).

All staff should be 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. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation.
Other risk factors which increase the likelihood of involvement in serious violence, such as being male, having been frequently absent or permanently excluded from school, having experienced child maltreatment and having been involved in offending, such as theft or robbery.

7.7 Forced Marriage

The tradition of arranged marriages has operated successfully within many communities and many countries for a very long time. A clear distinction must be made between a forced marriage and an arranged marriage. In arranged marriages, the families of both spouses take a leading role in arranging the marriage but the choice whether to accept the arrangement remains with the individuals. In forced marriage, at least one party does not consent to the marriage and some element of duress is involved.

Forced marriage is primarily an issue of violence against women. Most cases involve young women and girls aged between 13 and 30 years, although, there is evidence to suggest that as many as 15% of victims are male.

Forced Marriage is a criminal offence, the offences can include, abduction, physical violence, threatening behaviour. Sexual Intercourse without consent is rape.

How to proceed if you suspect a student may be forced into a marriage against their will.

If you suspect that one of your students is being forced into a marriage against their will, contact a Designated Safeguarding Officer, who will make an assessment whether to contact Social Services or go directly to the Forced Marriage Unit with the Police.

If a female ethnic minority student leaves college unexpectedly and without explanation, contact a Designated Safeguarding Officer, who will try to find out why this student has 'suddenly' left the college without explanation and monitor any concerns.

7.8 Private fostering[3]

Private fostering is very different from the care of children provided by local councils under the Children Act 1989.

Children under 16 (or 18 if disabled) are classed as privately fostered when they are cared for on a full-time basis by adults, who are not their parents or a close relative (brother, sister, aunt, uncle, or grandparents by birth or marriage) for a period of 28 days or more.

Usually, a birth parent chooses and arranges private foster placements, which could take many forms. These include:

- Children coming from abroad to access the education and health systems.
- Children living with a friend's family after separation, divorce or arguments at home.
- Teenagers living with the family of a boyfriend or girlfriend.
- People who come to this country to study or work, but antisocial hours make it difficult for them to care for their own children.

[3] Warrington Borough Council website www.warrington.gov.uk

Sometimes it's the young person themselves who chooses to live elsewhere and their parents do not object.

There are many reasons why a parent may be unable to look after their child full time, such as:

- Being admitted to hospital.
- Going abroad for lengthy periods.
- A breakdown in relationship between a parent and young person.

Should the College become aware of a private fostering arrangement in place for a student under 16 this will be reported to the relevant local authority, to ensure they are aware. The College understands that the local authority has a duty to ensure that children are well cared for in a safe and suitable home.

7.9 Other safeguarding issues include:

Any child may benefit from support before statutory intervention, including from universal services and community-based Early Help, or the targeted early help level of Family Help. All school and college staff should be particularly alert to the potential need for additional support for a child who:

- is disabled or has certain health conditions and has specific additional needs
- has special educational needs (whether or not they have a statutory Education, Health and Care plan)
- has a mental health need
- is a young carer
- is pregnant and or is a parent themselves
- has exhibited early signs of abusive, violent and/or harmful behaviours
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines
- is frequently missing/goes missing from education, home or care
- has been repeatedly removed from the classroom, experienced multiple suspensions, is on a part-time timetable, is at risk of being permanently excluded from schools, colleges and in Alternative Provision or a Pupil Referral Unit
- is at risk of exploitation, modern slavery, trafficking, including criminal or sexual exploitation
- is at risk of being radicalised into terrorism
- has a parent or carer in custody, or is affected by parental offending
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- is misusing alcohol and other drugs themselves
- is at risk of honour or faith-based abuse such as Female Genital Mutilation or Forced Marriage, and is a privately fostered child.

- Fabricated or induced illness
- Faith abuse
- Gender-based violence/violence against women and girls
- Hate

Harm can include children witnessing the ill-treatment of others and that this is particularly relevant when children **see, hear or experience** domestic abuse and its effects[4].

Safeguarding issues often overlap and can put children at risk of harm (including but not limited to those listed above)

8. Additional forms of abuse, neglect and exploitation relevant to adult at risk

8.1 Financial/Material Abuse

This includes theft, fraud, pressure around wills, property or inheritance or misuse of benefits.

8.2 Discriminatory Abuse

This includes racist, sexist, or other forms that are based on a person's disability and other forms of harassment, or similar treatment.

8.3 Self-Neglect

This is not a direct form of abuse but staff need to be aware of it in the general context of risk assessment/ risk management and to be aware that they may owe a duty of care to a vulnerable individual who places him/herself at risk in this way.

9. Procedure

9.1 Procedure to follow in the event of a disclosure or concern being raised with regards to child protection or adult at risk protection

Staff working with children are advised to maintain an attitude of **'it could happen here'** where safeguarding is concerned. When concerned about the welfare of a child, staff should always act in the best interests of the child.

If a child discloses to a member of staff that abuse has taken place, they should be listened to carefully. The following points give guidance on how to proceed with a student who makes an allegation.

i. The member of staff receiving the disclosure should remain calm

ii. The student should be listened to carefully, but not interviewed or asked to repeat the account. As soon as it becomes clear that the student is making an allegation of abuse, it is important that the student is gently informed, that the member of staff cannot keep this information to themselves, that they have a legal duty to pass it on to the Designated Safeguarding Officer. Confidentiality

[4] Keeping Children Safe in Education 2026

cannot be offered to the student. If staff have any concerns about a child's welfare, they should act on them immediately.

iii. As soon as possible, all of the details should be noted, including timing, setting, who was present, and what was said. The details should be passed to a Designated Safeguarding Officer. Make sure the account reported is verbatim to the student's own words or as close as is possible.

iv. The Designated Safeguarding Officer will discuss the line of action they have to take, so that the student is informed of the next stage. It may be appropriate for the Designated Safeguarding Officer to meet with the student. Details will be logged on the confidential area of Promonitor.

If a member of the safeguarding team is not available then contact should be made with a member of ELT or the duty manager.

Duty Managers and security staff have guidance to follow in the event of a referral being made "out of hours" A member of the Safeguarding Team will remain-available whilst college is open and if there are children und the age of 18 on site. Safeguarding support is available via the telephone in the evening to support staff working with adult students, telephone numbers are held on reception. In the event of an incident occurring outside of college hours (for example on a residential trip), the Director of Estates or a duty manager from ELT will contact the Designated Safeguarding Lead or Deputy Safeguarding Leads.

There is a dedicated safeguarding telephone number (01925 494222) with a voicemail facility for out of hours calls. Any messages left on the safeguarding voicemail will also automatically generate a message sent to the safeguarding e-mail.

The statutory guidance states that any member of staff can make a referral if they have concerns about a child or adult at risk. However, the college policy is for all referrals to be made via the Safeguarding Officers so that referrals can be managed and monitored effectively.

However, if a child or adult at risk is in immediate danger or is at risk of harm a referral should be made to children's social care and/or the police immediately. Anyone can make a referral. Where referrals are not made by the designated safeguarding lead the designated safeguarding lead should be informed, as soon as possible, that a referral has been made.

v. If the student is enrolled on a 14-16 programme, the Designated Safeguarding Officer, will contact the school's Designated Safeguarding Lead to liaise with them on referral. The conversation held with the school will be documented on Promonitor.

vi. If the student is over the age of 18, is suffering a form of abuse, but is not deemed an adult at risk, but as a college we are aware that there may be other siblings under the age of 18 in the environment, then a Designated Safeguarding Officer must be informed.

vii. Where a disclosure has been made learners will be signposted to external support services as required.

9.2 Reporting on Allegations of a Student abusing another Student (Child on Child abuse)

All staff are made aware that children, young people and adults at risk are capable of abusing their peers. Peer on peer abuse is abuse and should never be tolerated or passed off as “banter” or “part of growing up”.

All staff should be able to reassure victims that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

Should an allegation of abuse be made against a student by another student, the Designated Safeguarding Officer needs to be contacted immediately. The Designated Safeguarding Officer will make a decision about action to be taken, which may include contacting external agencies.

Both sets of parents or carers will be informed and a decision will be made whether to suspend the accused student, pending outcome of any investigation

Victims of peer abuse will be supported through college student support teams and processes and where appropriate in partnership with external agencies.
Examples of peer abuse are outlined in 7.5.

All staff will be made aware of gender issues that can be prevalent when dealing with peer on peer abuse. This could for example include girls being sexually touched/assaulted or boys being subject to initiation/hazing type violence.

9.3 Sexual violence and sexual harassment between children in college[5]

The College has a ‘Prevention of harassment, including sexual harassment policy’ which outlines the college approach and reporting channels for staff and students.
Examples of this type of peer abuse are outlined in 7.5.

The college will:

- make clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up.
- not tolerate or dismiss sexual violence or sexual harassment as “banter”, “part of growing up”, “just having a laugh” or “boys being boys”.
- challenge behaviour (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia and flicking bras and lifting up skirts.
- understand that all of the above can be driven by wider societal factors beyond the college, such as everyday sexist stereotypes and everyday sexist

[5] DfE Sexual Violence and sexual harassment between children in schools and colleges May 2018
Now incorporated in DfE: Keeping Children Safe in Education 2026

language. This is why a whole college approach (especially preventative education) is important.

- make clear that sexual harassment behaviours are not considered normal as reported by Ofsted[6]

SEND

Children with Special Educational Needs and Disabilities (SEND) are three times more likely to be abused than their peers. Additional barriers can sometimes exist when recognising abuse in SEND children. These can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration.
- these children being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children
- the potential for children with SEND being disproportionately impacted by behaviours such as bullying and harassment, without outwardly showing any signs.
- communication barriers and difficulties in managing or reporting these challenges risks that they do not understand that what is happening to them is abuse
- the need for intimate care or that these children are isolated from others
- that these children are more likely to be dependent on adults for care, and
- these children may have issues over cognitive understanding – being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in schools or colleges or the consequences of doing so.

Any reports of abuse involving children with SEND will therefore require close liaison with the Designated Safeguarding Lead (or deputies) and the named person with oversight for SEN in the college. The college will consider whether extra pastoral support and attention for these children, along with ensuring any appropriate support for communication is necessary.

Further information can be found at the following:

- SEND Code of Practice 0 to 25 years SEND code of practice: 0 to 25 years - GOV.UK (www.gov.uk), and
- Supporting Pupils at School with Medical Conditions. Supporting pupils with medical conditions at school - GOV.UK (www.gov.uk)

And from specialist organisations such as:

- The Special Educational Needs and Disabilities Information and Support Services (SENDIASS). SENDIASS offer information, advice and support for parents and carers of children and young people with SEND. All local authorities have such a service: Find your local IAS service

[6] Review of sexual abuse in schools and colleges - GOV.UK (www.gov.uk) June 2021

(councilfordisabledchildren.org.uk) Find your local IAS service (councilfordisabledchildren.org.uk)

- Mencap - Represents people with learning disabilities, with specific advice and information for people who work with children and young people Learning Disability - Down's Syndrome - Williams syndrome | Mencap

- NSPCC - Safeguarding children with special educational needs and disabilities (SEND) and NSPCC - Safeguarding child protection/deaf and disabled children and young people Safeguarding d/Deaf and disabled children and young people | NSPCC Learning

Children who are lesbian, gay or bisexual

Children who are lesbian, gay, bi, trans, or questioning their sexuality (LGBTQ) can be targeted by their peers. In some cases, a child who is perceived by their peers to be LGBTQ (whether they are or not) can be just as vulnerable as children who identify as LGBTQ.

Children who are questioning their gender

The college should keep in mind that it is common for children to engage in activities that are less typically associated with their sex. Sometimes young children also go through a period of questioning their gender but for the majority this will not continue into adulthood, while a small proportion may continue to question their gender and this feeling may intensify into puberty and beyond.

It is not for the college to initiate any action in this area; however, there are instances where a child or their parent has raised a request relating to social transition to which the college is responding. Members of staff should not adopt any changes relating to social transition unless a decision has been made by a school or college in consultation with parents or carers.

In making decisions about supporting social transition, schools and colleges must comply with their distinct but interacting obligations under safeguarding legislation and equality and human rights law, ensuring that any assessment of discrimination is informed by their evaluation of the welfare and best interests of the child and other children.

Schools and colleges should make decisions in line with the following principles and ensure that their decision-making process is documented and records are kept.

In the vast majority of cases the college will work with parents to determine what is in the best interests of the child as well as considering any clinical evidence or advice and seeking any additional non-clinical professional advice where relevant (for example the SENCO), including involving the DSL. The college will consider everything that could be affecting a child, including whether they have any wider health issues or neurodiversity. In considering the best interests of child, the college should also take a careful approach.

The college understands that parents and carers have the leading role in the lives of their children, and this area is no exception. Therefore, where a child who is

questioning their gender asks for support from a college, the college will engage parents/carers as a matter of priority and treat their views with importance. However, in the rare circumstances where involving parents or carers would constitute a greater risk to the child than not involving them, the college will consult their Designated Safeguarding Lead (DSL) to determine what action is needed to safeguard the child, before the parents are contacted or any decisions are taken.

The guidance above applies in cases where a child has requested support with social transition. In cases where a child confides in a member of staff about their feelings but does not ask the college to make changes to how they are treated, there is no reason to break any confidence unless there is a related safeguarding risk.

The college must not allow students into toilets, changing rooms, or boarding or residential accommodation designated for the opposite sex, with no exceptions. Similarly, where the college has implemented single-sex sports as being necessary for safety reasons, there should be no exceptions and pupils must not be allowed to participate in sports designated for the opposite sex.

When discussing requests with children, the college will take the time to sensitively explain that supporting any degree of social transition will not include allowing access to toilets, changing rooms or boarding or residential accommodation designated for the opposite sex, and will not include allowing students to join sport classes designated for the opposite sex where there are safety reasons for single-sex sport.

The circumstances of a case and/or the needs of a child may change over time. For example, it may become known that there are safeguarding issues that were not previously apparent (including where a young child is ‘living in stealth’ - see below), or that a decision has placed an unsustainable pressure on the college's resources. In such cases, the college may need to review their original decision taking into account the factors set out above, including involving the child's parents. In deciding whether to review a decision, the college should involve their DSL immediately.

Schools and colleges are legally required to record a child’s biological sex accurately wherever it is recorded.

Children living in stealth

The college is conscious of the vulnerabilities of children who have fully socially transitioned from an early age and may be living in stealth (that is, college friends/staff may be unaware of their biological sex). The Cass Review emphasised that these children are likely to approach puberty in a fearful and anxious state. The college should involve the DSL in these cases.

Support for children who wish to detransition

There may be circumstances where a child wants to fully or partially reverse a request that has previously been agreed. The Cass Review highlighted the importance of maintaining flexibility and keeping options open for children who have socially transitioned and recommended that support should be provided to children who wish to de-transition. The college will work closely with parents and relevant experts to ensure that children in this position are supported

Definitions

Sexual violence

When referring to sexual violence in this policy, we do so in the context of child-on-child sexual violence.

For the purpose of this policy, when referring to sexual violence we are referring to sexual offences under the **Sexual Offences Act 2003** as described below:

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 (for example rape or penetration with an object) : 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.

What is consent? Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another, e.g.to vaginal but not anal sex or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity and each time activity occurs. Someone consents to vaginal, anal or oral penetration only if s/he agrees by choice to that penetration and has the freedom and capacity to make that choice.

- a child under the age of 13 can never consent to any sexual activity.
- the age of consent is 16.
- sexual intercourse without consent is rape.

Sexual harassment

For the purpose of this policy, sexual harassment refers to ‘unwanted conduct of a sexual nature’ that can occur online and offline and is referred to in the context of child-on-child sexual harassment. Sexual harassment is likely to: violate a child’s dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment.

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

- sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names.
- sexual “jokes” or taunting.

- physical behaviour, such as: deliberately brushing against someone, interfering with someone's clothes and displaying pictures, photos or drawings of a sexual nature.
- online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence.
- Upskirting is a highly intrusive practice, which typically involves someone taking a picture under another person's clothing without their knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm, and is a specific criminal offence in England & Wales

Online sexual harassment may include:

- non-consensual sharing of sexual images and videos.
- sexualised online bullying;
- unwanted sexual comments and messages, including, on social media.
- sexual exploitation; coercion and threats.

Sexual harassment creates an atmosphere that, if not challenged, can normalise inappropriate behaviours and provide an environment that may lead to sexual violence.

Harmful sexual behaviour

Children's sexual behaviour exists on a wide continuum, from normal and developmentally expected to inappropriate, problematic, abusive and violent. Problematic, abusive and violent sexual behaviour is developmentally inappropriate and may cause developmental damage.

Harmful sexual behaviour can occur online, face to face or both and can also occur simultaneously between the two and should be considered in a child protection context.

When considering harmful sexual behaviour, ages and the stages of development of the children are critical factors to consider. 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.

Children displaying harmful sexual behaviour have often experienced their own abuse and trauma. It is important that they are offered appropriate support.

Sextortion also known as Financially Motivated Sexual Extortion or Sexually Coerced Extortion

Sextortion involves people being forced into paying money or meeting another financial demand, after an offender has threatened to release nude or semi-nude photos of them. This could be a real photo taken by the victim, or a fake image created of them by the offender.

All age groups and genders are being targeted, but a large proportion of cases have involved male victims aged between 14-18.

These crimes can be perpetrated by organised crime groups based overseas, predominantly in some West African countries, but some are also known to be located in South East Asia.
They are motivated by making money quickly, rather than by sexual gratification, and in some cases have gone from initial contact to blackmailing their victim in under an hour.

Child victims have reported being:

- contacted by an online account that they do not know but appears to be another child or young person. They may also be contacted by a hacked account of a child or young person they do know, but the communication feels unfamiliar;
- quickly engaged in sexually explicit communications, which may include the offender sharing an indecent image first;
- manipulated or pressured into taking nude or semi-nude photos or videos;
- told they have been hacked and the offender has access to their images, personal information and contacts (whether this is true or not);
- blackmailed into sending money or meeting another financial demand (such as purchasing a pre-paid gift card) after sharing an image or video, or the offender sharing hacked or digitally manipulated/AI-generated images of their victim and making the threat of sharing them wider.

- **Don't pay, do stop contact and block:** you may be tempted to pay, but there is no guarantee that this will stop the threats. As the offender's motive is to get money, once you have shown you can pay, they will likely ask for more and blackmail may continue. If you have paid, don't panic but don't pay anything more. Help your child to stop all communication with the offender and block them on any accounts that they have been contacted on.
- **Avoid deleting anything:** try not to delete anything that could be used as evidence such as messages, images, telephone numbers, and bank account details.
- **Report to the police or CEOP:** call 101 or 999 if there is an immediate risk of harm to your child. Or you can use the CEOP Safety Centre to report any online blackmail attempts[7].

The immediate response to a report

The initial response to a report from a child is important. It is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

In some cases, the victim may not make a direct report. For example, a friend may make a report or a member of staff may overhear a conversation that suggests a child has been harmed. It is important that in such instances staff take appropriate action personally by reporting these concerns to the college safeguarding team immediately. In such cases, the basic safeguarding principles remain the same, but it is important to understand why the victim has chosen not to make a report

[7] NCA issues urgent warning about 'sextortion' - National Crime Agency

themselves. This discussion should be handled sensitively and with the support of children's social care if appropriate.

Where reports of alleged sexual violence or sexual harassment involves learners from this college, but is alleged to have taken place away from college premises, or online, or where the children concerned attend two or more different colleges. Appropriate information sharing and effective multi-agency working will be especially important.

Considering confidentiality and anonymity

Confidentiality

Staff taking a report should **never promise confidentiality** as it is very likely that it will be in the best interests of the victim to seek advice and guidance from others in order to provide support and engage appropriate agencies.

The designated safeguarding lead (or a deputy) will consider the following:

- parents or carers should normally be informed (unless this would put the victim at greater risk)
- the basic safeguarding principle is: if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to children's social care
- rape assault by penetration and sexual assaults are crimes. Where a report of rape, assault by penetration or sexual assault is made, this should be referred to the police.

Anonymity

The college will do all it 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.

Risk Assessment

When there has been a report of sexual violence, the designated safeguarding lead (or a deputy) will make an immediate risk and needs assessment.

Where there has been a report of sexual harassment, the need for a risk assessment should be considered on a case-by-case basis.

The risk and needs assessment will consider:

- the victim, especially their protection and support.
- the alleged perpetrator.

- all the other children (and, if appropriate, adult students and staff), especially any actions that are appropriate to protect them.

Risk assessments will be recorded (written or electronic) and will be kept under review.

At all times, the school or college will actively consider the risks posed to all students and putting adequate measures in place to protect them and keep them safe.

The designated safeguarding lead (or a deputy) will ensure engagement with children's social care and specialist services as required. 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.

Professional assessments will be used to inform the college's approach to supporting and protecting students and updating the college risk assessment.

Action following a report of sexual violence and/or sexual harassment

What to consider

The designated safeguarding lead (or a deputy) is likely to have a complete safeguarding picture and be the most appropriate person to advise on the schools or college's initial response.

Important considerations will include:

- **the wishes of the victim** in terms of how they want to proceed. This is especially important in the context of sexual violence and sexual harassment. Victims should be given as much control as is reasonably possible over decisions regarding how any investigation will be progressed and any support that they will be offered.
- **the nature of the alleged incident(s),** including: whether a crime may

Ongoing response

For information on good practice in managing the ongoing response to reports of sexual violence and sexual harassment the college will use the guidance in DfE Keeping Children Safe in Education 2026.

The advice in this document will be used to inform actions around:

1. Safeguarding and supporting the victim
2. Safeguarding and supporting the alleged perpetrator
3. Discipline and the alleged perpetrator
4. Working with parents and carers
5. Safeguarding other children

Sexting and Sharing Nudes (sharing self-generated intimate images and/or videos including those generated using I e.g. deepfakes)

Sexting is when someone sends sexually explicit messages and sharing self-generated intimate images and/or videos including those generated using I e.g. deepfakes is when someone shares sexual, naked or semi-naked images or videos of themselves or others. They can be sent using mobiles, tablets, smartphones, and laptops - any device that allows you to share media and messages. The NSPCC proposes in its update document '**Why language matters: Sexting or sharing nudes' 3/10/22** that professionals should consider referring to sexting activities as **'sharing nudes'** which is in line with the language commonly used by young people[8].

Creating and sharing sexual photos and videos of under 18's is illegal. Advice issued by UK Council for Internet Safety (UKCIS) has issued the phrase 'youth produced sexual imagery' instead of sexting. This covers the following types of incident:

- A person under the age of 18 creates and shares sexual imagery of themselves with a peer under the age of 18
- A person under the age of 18 shares sexual imagery created by another person under the age of 18 with a peer under the age of 18 or an adult
- A person under the age of 18 is in possession of sexual imagery created by another person under the age of 18

Disclosing private sexual photographs and films with intent to cause distress is a criminal offence.[9] However the College is aware of the consequences of criminalising children and follows the guidance issued by the Police when dealing with cases of sexting to ascertain full circumstances and identify whether the act is:

Aggravated – Criminal or abusive elements

Adult involvement or criminal or abusive behavior by minors such as sexual abuse, extortion, threats, malicious conduct arising from personal conflicts.

Experimental – Youths sending, receiving or forwarding sexually explicit messages, photographs or images of themselves: 1) to share with established boy or girlfriends 2) To create romantic interest in another youth 3) For reasons such as attention seeking (no criminal element or intent)

In the first instance the College will follow guidance issued by UKCIS Sharing nudes, advice for education settings working with children and young people/sharing nudes and semi nudes how to respond to an incident overview[10]. and existing safeguarding procedures when alerted to concerns regarding sexting. Should instances of sexting be disclosed or uncovered by the college, which are thought to be aggravated these will be referred to the CSE Co-coordinator (Police) at the relevant local authority. The CSE screening tool will also be used and a referral to Missing children/children at risk of sexual exploitation and trafficked children (MCSETO) operational group will be made. If appropriate young people will be

[8] NSPCC website www.nspcc.org.uk

[9] Criminal Justice and Courts Act 2015

[10] https://www.gov.uk/government/publications/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people/sharing-nudes-and-semi-nudes-how-to-respond-to-an-incident-overview

directed to Child Exploitation Online Protection Centre (CEOP) to report if appropriate

Given the potential risks faced by young people online, it's crucial that staff feel confident communicating with young people. This means both understanding the language used by young people to describe their online interactions and using appropriate language that young people can understand and relate to.

10. Reporting and Dealing with Allegations of Abuse against Members of Staff

The Colleges has procedures in place to manage any safeguarding concern or allegation (no matter how small) about staff members (including agency/supply staff, trainee teachers, volunteers, and contractors).

The college recognises that an allegation of child abuse made against a member of staff (including trainee teachers,) may be made for a variety of reasons and that the facts of the allegation may or may not be true. The college therefore needs policies and procedures on the management of situations where there are allegations of abuse.

These procedures outline the steps to be followed and considerations to be made for the reporting and subsequent management of an allegation of abuse against a member or members of staff. It is imperative that those dealing with an allegation maintain an open mind and those that investigations are thorough and not subject to delay.

The college recognises that the Children Act 1989 states that the welfare of the child is the paramount concern. It is also recognises that hasty or ill-informed decisions in connection with a member of staff can irreparably damage an individual's reputation, confidence and career. Therefore, those dealing with such allegations within the College will do so with sensitivity and will act in a careful, measured way.

Scope - These procedures apply to all staff, whether teaching (including trainee teachers,), administrative, management or support, as well as to volunteers and contractors. The word "staff" is used to denote all these groups.

Procedures - Making an allegation regarding concerns over another staff member.

There are two ways to raise concerns regarding the conduct of another staff member. Staff can either report the allegation directly to the Vice Principal: Quality & MIS or the Director of Human Resources or they may use the Whistleblowing Procedure.

If they choose to use the Whistleblowing Procedure, then the staff member must be made aware that anonymity cannot be guaranteed if the matter is subsequently dealt with by the Police or other external organisation. The Whistleblowing Procedure outlines how a member of staff can report an allegation. The Director of Human Resources, Vice Principal: Quality & MIS and the Principal will then decide on how to deal with the matter who will then follow the normal procedure, which may/will result in a referral to the Local Area Designated Officer (LADO).

10.1 Procedures - Receiving an Allegation from a Child

A member of staff who receives an allegation about another member of staff from a

child should follow the guidelines in section 7 for dealing with disclosure.

The allegation should be reported immediately to the Vice Principal: Quality & MIS or the Principal (unless the Principal is the person against whom the allegation is made, in which case the report should be made to the Vice Principal: Quality & MIS or the designated Governor).

Immediately upon an allegation being made, as well as consulting with the LADO at Social Care and/or the Police, the Vice Principal: Quality & MIS or the Principal (or designated person if the allegation is against the Principal) should:

- Obtain written details of the allegation, signed and dated from the person who received the allegation. (Not from the student who made and/or was the subject of the allegation)
- The written details should be countersigned and dated by the Principal (or designated person).
- Record information about times, dates, locations and names of potential witnesses.
- Contact details for the Warrington Local Area Designated Officer (LADO) 01925 442079 or LADO@warrington.gov.uk and for Cheshire West and Chester complete the referral form and send to safeguardinglado@cheshirewestandchester.gcsx.gov.uk

10.2 Initial Assessment by the Principal (or designated person)

The Principal (or designated person) should make an initial assessment of the allegation (ensuring consultation with the Staff Member with Lead Responsibility, the Designated Governor and the relevant Local Safeguarding Partnership as appropriate).

Where the allegation is considered to be either a potential criminal act or indicates that the child has suffered, is suffering or is likely to suffer significant harm, the matter should be reported immediately to a LADO It is important that the Principal (or designated person) does not investigate the allegation. The initial assessment should be on the basis of the information received and is a decision whether or not the allegation warrants further investigation.

Other potential outcomes are:

a. The allegation represents inappropriate behavior or poor practice by the member of staff and is neither potentially a crime nor a cause of significant harm to the child. The matter should be addressed in accordance with the College disciplinary procedures.

b. The allegation can be shown to be false because the facts alleged could not possibly be true.

10.3 Supply teachers, trainee teachers and all contracted staff

In some circumstances the college may have to consider an allegation against an individual not directly employed by them, where its disciplinary procedures do not fully

apply because agencies will have their own policies and procedures; for example, supply teachers, trainee teachers or contracted staff provided by an employment agency or business.

Whilst the college is not the employer of supply teachers, they should ensure allegations are dealt with properly. In no circumstances should the college decide to cease to use a supply teacher due to safeguarding concerns, without finding out the facts and liaising with the LADO to determine a suitable outcome. Governing bodies and proprietors should discuss with the supply agency or agencies where the supply teacher is working across a number of schools or colleges, whether it is appropriate to suspend the supply teacher, or redeploy them to another part of the college, whilst they carry out their investigation.

Agencies should be fully involved and co-operate with any enquiries from the LADO, police and/or local authority children's social care. The college will usually take the lead because agencies do not have direct access to children or other college staff, so they will not be able to collect the facts when an allegation is made, nor do they have all the relevant information required by the LADO as part of the referral process. Supply teachers, whilst not employed by the college, are under the supervision, direction and control of the governing body or proprietor when working in the college. They should be advised to contact their trade union representative if they have one, or a colleague for support. The allegations management meeting, which is often arranged by the LADO, should address issues such as information sharing, to ensure that any previous concerns or allegations known to the agency or agencies are considered by the college during the investigation.

When using a supply agency, the college should inform the agency of the process for managing allegations but also take account of the agency's policies and the duty placed on agencies to refer to the DBS as personnel suppliers. This should include inviting the agency's human resource manager or equivalent to meetings and keeping them up to date with information about its policies.

Where concerns or allegations relate to a trainee teacher placed within the college, the expectations of the college set out above also apply. In addition, teacher training providers are expected to follow the same procedures as set out for supply agencies.

10.4 Enquiries and Investigations

Safeguarding enquiries by Social Care or the Police are not to be confused with internal, disciplinary enquiries by the college. The college may be able to use the outcome of external agency enquiries as part of its own procedures. The safeguarding agencies, including the police, have no power to direct the college to act in a particular way; however, the college should assist the agencies with their enquiries. Social Care and the Police would be likely to convene a Senior Strategy Meeting and a representative of the college would be expected to participate.

The college shall hold in abeyance its own internal enquiries while the formal Police or Social Services investigations proceed; to do otherwise may prejudice the investigation. Any internal enquiries shall conform to the existing staff disciplinary procedures.

If there is an investigation by an external agency, for example the Police, the Principal (or designated person) should normally be involved in, and contribute to,

the inter-agency strategy discussions. The Principal (or designated person) is responsible for ensuring that the college gives every assistance with the agency's enquiries. He/she will ensure that appropriate confidentiality is maintained in connection with the enquiries, in the interests of the member of staff about whom the allegation is made. The Principal (or designated person) shall advise the member of staff that he/she should consult with a representative, for example, a trade union.

Subject to objections from the Police or other investigating agency, the Principal (or designated person) shall:

a. Inform the child/children/adult at risk/parent/carer making the allegation that the investigation is taking place and what the likely process will involve.
b. Ensure that the parents/carers of the child making the allegation are aware that the investigation is taking place and what the likely process will involve.
c. Inform the member of staff against whom the allegation was made of the fact that the investigation is taking place and what the likely process will involve.
d. Inform the Chair of Governors and/or the designated Governor of the allegation and the investigation.

The Principal (or designated person) shall keep a written record of the action taken in connection with the allegation (see section 22 Confidentiality and section 23 Written Records).

Media attention during an investigation of an allegation can add to the problems for the member of staff and may even hinder an investigation. The college will carefully manage all media relations sensitively and appropriately, as outlined in the Critical Incident Management Strategy. Regrettably, it is often the case that the media become aware of allegations through parents or students. Any briefings to staff and governors will emphasise the need to avoid media coverage in accordance with the Staff Code of Conduct. Staff have the Human Rights Act 2000 to protect "privacy". Advising the member of staff of any early indications of media interest and or coverage will be essential.

10.4 Potential Outcomes from Senior Strategy Meeting

There are four possible outcomes from a strategy meeting. If the matter is referred to the Police or Social Services, the college will be guided by these agencies on how to deal with the matter. It is likely that this will result in an external investigation.

Decisions on whether to suspend the member of staff and/or invoke the disciplinary procedure will be done in consultation with these organisations. The strategy meeting may decide that the college can investigate the matter and report back the outcome back to the strategy group. If this is the case, then the matter will be dealt with using the college's disciplinary procedure. The fourth outcome could be that the strategy meeting felt there was no case to investigate.

10.5 Suspension of Staff

Please refer to the disciplinary procedure for guidance on suspension of staff. Consideration should be given to alternatives: e.g. paid leave of absence; agreement to refrain from attending work; change of, or withdrawal from, specified

duties.

The parents/carers of the child/adult at risk making the allegation will be informed of the suspension. They should be asked to treat the information as confidential. Consideration should be given to informing the student making the allegation of the suspension.

10.6 The Disciplinary Investigation

The disciplinary investigation should be conducted in accordance with the existing staff disciplinary procedures.

The student/s making the allegation and/or their parents should be informed of the outcome of the investigation and proceedings. This should occur prior to the return to College of the member of staff (if suspended).

The Principal (or designated person) should give consideration to what information should be made available to the general population of the College.

The college will support the legal requirement to make a referral to the Disclosure & Barring Service (DBS) where they think an individual has engaged in conduct that harmed (or is likely to harm) a child or if the person otherwise poses a risk of harm to a child.

10.7 Low level concerns

As part of their whole college approach to safeguarding, the college will ensure that we promote an open and transparent culture in which all concerns about all adults working in or on behalf of the college (including supply teachers, volunteers and contractors) are dealt with promptly and appropriately.

It is critical to create 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. This should encourage an open and transparent culture, enabling college to identify concerning, problematic or inappropriate behaviour early.

What is a low-level concern?

The term ‘low-level’ concern does not mean that it is insignificant. A low-level concern is any 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 college may have acted in a way that:

- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work; and
- does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.

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

- being over friendly with children
- having favourites
- 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.

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.

It is crucial that any such concerns, including those which do not meet the harm threshold, are shared responsibly and with the right person, and recorded and dealt with appropriately. Ensuring they are dealt with effectively should also protect those working in or on behalf of schools and colleges from potential false allegations or misunderstandings.

10.8 Allegations without foundation

Obviously false allegations may be indicative of problems of abuse elsewhere. A record should be kept and consideration given to a referral to Social Care in order that other agencies may act upon the information.

In consultation with the designated senior member of staff and/or the designated Governor, the Principal shall:

a. Inform the member of staff against whom the allegation is made orally and in writing that no further disciplinary or safeguarding action will be taken. Consideration should be given to offering counselling/support.

b. Inform the parents/carers of the alleged victim that the allegation has been made and of the outcome

c. Where the allegation was made by a child/adult at risk other than the alleged victim, consideration to be given to informing the parents/carers of that child/adult at risk.

d. Prepare a report outlining the allegation and giving reasons for the conclusion that it had no foundation and confirming that the above action had been taken

10.9 Records

It is important that documents relating to an investigation are retained in a secure place, together with a written record of the outcome and, if disciplinary action is taken, details retained on the member of staff's personal and confidential file (see section 16 Confidentiality and section 17 Written Records). These records should be kept until the member of staff's normal retirement age or for a period of 10 years from the date of allegation if that is longer.
If a member of staff is dismissed or resigns before the disciplinary process is completed, he/she should be informed about the college's statutory duty to inform the Disclosure and Barring Service (DBS). This would be carried out by the Director of Human Resources.

10.10 Monitoring Effectiveness

Where an allegation has been made against a member of staff, the designated Governor, together with the senior staff member with lead responsibility should, at the conclusion of the investigation and any disciplinary procedures, consider

whether there are any matters arising from it that could lead to the improvement of the college's procedures and/or policies and/or which should be drawn to the attention of the Local Safeguarding Partnership/Social Care. Consideration should also be given to the training needs of staff.

The NSPCC whistleblowing helpline is available for staff who do not feel able to raise concerns regarding child protection failures internally.

Staff can call: 0800 028 0285 – line is available from 8:00 AM to 8:00 PM, Monday to Friday and Email: help@nspcc.org.uk.[11]

11. Recruitment and Selection Procedures

The College pays full regard to DfE guidance "Keeping children safe in education", September 2026, ensuring that all appropriate measures are applied in relation to everyone who works in the college (e.g. staff, including trainee teachers, volunteers and staff employed by contractors). Safer recruitment practice includes scrutinising applicants, verifying identity and academic or vocational qualifications, obtaining professional and character references, checking previous employment history and ensuring that a candidate has the health and physical capacity for the job. It also includes undertaking interviews and DBS checks and compliance with the Disclosure & Barring Service (DBS) regulations as well as a barred list check prior to the commencement of employment.

In addition, as part of the shortlisting process the college may consider carrying out a search (via an online search engine) as part of due diligence on the shortlisted candidates. This may help identify any incidents or issues that have happened, and are publicly available online, which the college may explore with the applicant at interview. The College informs shortlisted candidates that online searches may be done as part of due diligence checks.

As part of the college's induction procedure all staff members receive Part one of the most recent publication of Keeping Children Safe in Education undergo safeguarding and child protection training. Training is regularly updated and all staff receive updates at least annually.

This is outlined further in the College's Recruitment and Selection Policy.

12. Responsibilities of College Staff

The college has a staff Code of Conduct which all staff employed by the college must read and adhere to. Full compliance is essential to ensure the wellbeing of students and staff. As well as safeguarding children/adult at risk, the Code of Conduct is also intended to protect staff from the potential risk of a safeguarding allegation being made against them. Staff must ensure they are aware of the college's safeguarding policy and procedures and know the identity of the Safeguarding Officers. Staff will monitor attendance closely and follow up non-attendance promptly to minimise the risk of learners missing from education, therefore reducing the risk of learners becoming vulnerable to abuse and harm. The

[11] https://www.nspcc.org.uk/

college will also use disciplinary procedures to reinforce positive behaviour and address instances of poor behaviour including bullying.

All staff will wear a college staff lanyard and ID badge.

13. Online Safety

The use of technology has become a significant component of many safeguarding issues. Child sexual exploitation; radicalisation; sexual predation: technology often provides the platform that facilitates harm. An effective approach to online safety empowers a school or college to protect and educate the whole school or college community in their use of technology and establishes mechanisms to identify, intervene in, and escalate any incident where appropriate.

The breadth of issues classified within online safety is considerable, but can be categorised into three areas of risk:

- **content**; being exposed to illegal, inappropriate, or harmful content, for example: pornography, racism, misogyny, self-harm, suicide, antisemitism, radicalisation, extremism, extreme sexual or physical violence, misinformation, disinformation (including fake news) and conspiracy theories
- **contact**; being subjected to harmful online interaction with other users or generative AI applications that simulate this; for example: peer to peer pressure, commercial advertising and adults posing as children or young
- **conduct**; online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of self-generated intimate images and/or videos including those generated using AI e.g. deepfakes, sharing other explicit images and online bullying, and
- **commerce**: risks such as online gambling, inappropriate advertising, phishing and or financial scams. If it is felt, students or staff are at risk, it can be reported to the Anti-Phishing Working Group (https://apwg.org/).

The college have filters and monitoring systems in place and these are regulated and risk assessed as part of the Prevent Duty. We have an online safety policy which identifies the usage and behaviour of staff and students.

The college has clearly assigned roles and responsibilities to manage filtering and monitoring systems, these are communicated at induction and at least annually in safeguarding training.

- The IT department are responsible for reviewing filtering and monitoring provision at least annually. Reviews should include checks that filtering is working appropriately on all internet-connected devices in all relevant locations, and a record should be kept of these checks.
- The IT department are responsible for blocking harmful and inappropriate content without unreasonably impacting teaching and learning.
- The safeguarding team review the daily and weekly filtering and monitoring reports and follow up accordingly where appropriate or where there are safeguarding needs or concerns.

As a college of further education, we appreciate the value of technology and that appropriate filters are in place, yet this does not lead to unreasonable restrictions which would limit online teaching.

The college has appropriate cyber security systems in place in order to protect children's personal information and adheres to the cyber security standards for schools and colleges.

Education at home

Where young people are being asked to learn online at home, the college will refer to and use the links and resources provided by the DfE alongside its own policies, procedures and guidance.

14. Educational Visits and Work Placements

All college trips, activities and placements will be assessed to safeguard and promote the welfare of students and staff, and ensure they are not exposed to any potential safeguarding risks.

14.1 Trips, Residential Visits and Activities

These will be assessed via the relevant Health & Safety Educational Visits checks and paperwork. Learners will be made aware of their responsibilities in relation to safeguarding themselves and others.

If students are staying with families overseas as part of a student exchange, the college should work with partner organisations to ensure appropriate checks are undertaken prior to the visit. DBS cannot access criminal records held overseas. The relevant foreign embassy or High Commission of the country in question can be contacted to see what checks can be undertaken in that country.

Wherever possible, college staff will visit overseas placements prior to the placement being undertaken. Contact details will be given to students to ensure they have an appropriate point of contact.

14.2 Work Placements

Employers and training organisations will be asked to co-operate with the college in putting in place and subscribing to appropriate safeguards. Health and Safety Procurement (HASP) paperwork will be completed by staff with Health & Safety qualifications.

Training organisations and employers will be asked to make a commitment to safeguarding learners' welfare by endorsing an agreed statement of safeguarding principles.

Enhanced DBS checks cannot be requested for staff supervising 16- and 17-year-olds in the workplace. However, a representative from the college will meet any person whose normal duties will include regular caring for, training, looking after or supervising a child in the workplace where that person has been specifically

designated to have responsibility for such activities.

4.3 Work Place (Apprenticeships)

Employers and training organisations will be asked to co-operate with the college by putting in place and subscribing to appropriate safeguards. Health and Safety vetting documentation must be provided to the college alongside a child protection policy, and employer's liability insurance (unless eligible for ELI exemption). The college in conjunction with the employer will review and update this annually.

Each apprentice will have an 8 - 12 weekly performance review where Prevent and safeguarding will be discussed. If any concerns occur outside of these time employers and apprentices will contact their apprentice coach as point of contact.

Appendix C gives more information, and can be used as a separate document for employers to help them understand and carry out their duty with regards to Prevent, Safeguarding and British Values.

Employers Safeguarding and Prevent Duty

Employers have a duty to comply with all current and future UK legislation and statutory responsibilities. There is a particular exception that an employer should take responsibility for an apprentice's welfare in the workplace, and to also seek appropriate advice when they feel an apprentice may be at risk in their personal lives.

Employers Safeguarding and Prevent Role

- Familiarise themselves with relevant government legislation.
- Take appropriate steps to understand what safeguarding means in practice at their organisation, in the context of the responsibilities they have for the people they employ.
- Ensure that any staff working with apprentices in a position of trust are appropriate for the role, and do not present any danger or threat.
- If appropriate, identify a person to coordinate safeguarding across an organisation.
- Demonstrate a commitment to the principles that underpin the Prevent Duty, referring any issues or concerns to the Safeguarding Team at college
- Volunteering
- The college will instigate a Partnership Agreement for volunteering placements that will outline the responsibilities of external organisations and the college.
- The college will take a written volunteering opportunity form from the organisation that will also act as a checklist/registration form.
- The college will carry out inspection and initial meeting with the external organisation.
- The college will ensure that the organisation has adequate safeguarding procedures in place.
- The college will ensure that the organisation has adequate DBS checking procedures in place if appropriate.

- The college will help with pre-selection screening of student volunteers as part of referral process.
- The college will ensure that adequate induction and training are offered to volunteers.
- The college will ensure proper supervision, and will provide a dedicated contact for volunteers in case of concerns or difficulties.

15. Bullying and Harassment

The college is committed to providing a caring, friendly and safe environment for all our learners so they can learn in a relaxed and secure atmosphere. Bullying of any kind is unacceptable. If bullying does occur, all learners should be able to tell and know that incidents will be dealt with promptly and effectively. This means that *anyone* who knows that bullying is happening is expected to let staff know. Staff are required to inform Safeguarding Officers of any incidence of bullying as soon as they are aware that it has occurred. This refers to both in face and remote learning.

Further guidelines can be found in the Prevention of Harassment, including Sexual Harassment Policy and Student Disciplinary and Positive Behaviour Management.

16. Supporting Vulnerable/at risk Learners

College staff are alerted to the potential need for early help and intervention for a child/young person who:

- is disabled and has specific additional needs
- has special educational needs (whether or not they have a statutory education, health and care plan)
- those in care or care leavers
- is a young carer
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups
- is frequently missing/goes missing from care or from home
- is misusing drugs or alcohol themselves
- is 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
- is showing early signs of abuse or neglect
- is at risk of being radicalised or exploited
- is a privately fostered child

Services and support are available in college to assist and support those students who are vulnerable or may be at risk. The Safeguarding Team, Progress Coaches and all tutors are trained to recognise signals that students may be struggling or may be experiencing difficulties. Full time students meet regularly with their

Progress Coach to monitor their progress, attendance and general wellbeing. Swift referral can be made to support services such as the Welfare team, Learning Support team, as well as referral to external support services.

Evidence suggests that LGBTQ+ children and young people might be at increased risk of some forms of harm such as child sexual exploitation, online abuse and bullying ***(Safeguarding LGBTQ+ children and young people, NSPCC. 20/5/22)***

Assessments to identify vulnerable learners (such as those in care, care leavers, young carers, learners with learning difficulties and/or disabilities, learners with mental health problems, adults at risk, etc.) are undertaken prior to enrolment to ensure the students are adequately supported. The At-Risk system enables staff to identify and closely monitor students.

Any unauthorised absence is followed up by Progress Coaches to check why the student was not in college. Any persistent absence is discussed with parents of students under 18. The unexplained absence of any child, young person or adult at risk should be referred to the Safeguarding Officers as their absence may be an indication of potential abuse or concern. The Safeguarding Officer will then contact appropriate external agencies and parents/carers. Attendance will also be tracked if students are working remotely (see Attendance and Punctuality Procedures)

The college has close working relationships with the Local Authorities' Virtual School to monitor vulnerable students, such as those in care and young carers The appropriate member of the Safeguarding Team has regular meetings with officers from the Virtual School to monitor student progress and review the Personal Education Plan (PEP). The Safeguarding and Inclusion Managers retain detailed information in relation to children in care, their circumstances and social worker details.

The college recognises that children and adults with special educational needs (SEN) and disabilities can face additional safeguarding challenges. During training reference is made to the additional barriers that can exist when recognising abuse and neglect in this group of children, such as:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child or adult disability without further exploration
- Children and adults with SEN and disabilities can be disproportionally impacted by things like bullying - without outwardly showing any signs
- Communication barriers and difficulties in overcoming these barriers

Students with Previous Criminal Convictions

Guidance regarding the recruitment of students who have previous criminal convictions, cautions or reprimands can be found in the Admissions Policy and Procedure.

17. Sport

As children get older, some sports are typically taught and played in single-sex groups.

The Equality Act 2010 contains an exception in relation to single-sex sport. It applies to participation in any sport or game, or activity of a competitive nature, where the physical strength, stamina or physique of the average girl would put her at a disadvantage in competition with the average boy (or vice versa). This means that schools and colleges can separate children according to their biological sex in these circumstances without discriminating unlawfully against them on the basis of their sex.

Some sports may need to be played in single-sex groups from a certain age to ensure children's safety, and where this is the case there should be no exceptions. In other cases, the college may have adopted a policy of single-sex sports for reasons related to fairness.

Where there are no safety concerns and a child makes a request relating to how they participate, schools and colleges will need to consider the request in light of the advice on "considering requests for support with social transition". This means that the school or college would need to take into account all the relevant factors, including whether supporting social transition is overall in the best interests of the child, as well as considering the impact on other children and the aim of creating safe and fair environments for children to participate in PE

18. Regulations and safeguarding requirements relating to school premises

College must not allow children into toilets designated for the opposite biological sex. This includes where the college is responding to a request to support any degree of social transition for children who are questioning their gender.

If a child does not want to use the toilet designated for their biological sex, the college should consider whether they can provide an alternative toilet facility, for example self-contained individual toilets, without compromising the provision of single-sex facilities. These alternative arrangements should not compromise the safety, comfort, privacy or dignity of the child, or of other children.

It is important that the college keeps a clear record of these situations, ensure they are communicated appropriately, and review them regularly.

Changing rooms and showers

If a child does not want to use the changing rooms and showers designated for their sex, the college should consider whether they can provide an alternative changing or washing facility, but this must not compromise the provision of single-sex facilities. This could be a fully enclosed room – for use by one child at a time that can be secured from the inside – or by allowing access to facilities at an alternative time

It is important that schools and colleges keep a clear record of these situations, ensure they are communicated appropriately, and review them regularly.

Boarding and residential accommodation

To comply with their safeguarding duties, the college must not allow a child to share overnight accommodation with a child of the opposite biological sex. Responding to

a request to support any degree of social transition must not include allowing access to boarding or residential accommodation designated for the opposite sex.

In allocating sleeping arrangements such as dormitories, tents or shared rooms for college trips, the college must have regard to their duties under the Equality Act, their safeguarding obligations, and other relevant regulations and standards, including those relating to boarding and residential accommodation.

If, however, a child does not want to share a room with another child of the same biological sex, alternative arrangements should be sought where possible. Alternative arrangements should not compromise the safety, comfort, privacy or dignity of any child. They might include, for instance, finding a suitable separate room for the child.

Where a child's concern reflects a request for support with social transition, the college should consider the section on "considering requests for support with social transition" before making any decisions

19. Safeguarding 14-16 Students

Safeguarding arrangements and responsibilities for students studying on 14-16 provision at the college are undertaken on an individual basis dependent on the needs of the learner, in agreement with partner school, parent and local authority.

Procedures for ensuring that under 16-year-olds are safe when undertaking work placement in the college are in place.

20. Visitors and Contractors

All visitors must sign in at Reception and wear a college visitor lanyard and ID badge whilst they are in college. Visitors will be asked to read and support the college's commitment to safeguarding our learners. They will be supervised around college as appropriate.

Contractors are issued with guidance on an annual basis to ensure they are aware of safeguarding and their responsibilities whilst in college. If appropriate, supervision or DBS checks for contractors will be arranged. The identity of contractors should be checked on arrival at the college.

21. Curriculum

The college will ensure learners are taught about safeguarding, including online, through teaching and learning opportunities. Children, young people and adults at risk can develop an understanding of why and how to keep safe. The Tutorial programme includes key topics such as, bullying, cyber bullying, internet safety, abuse, Prevent, British Values, Equality & Diversity, sexting, peer on peer, personal health and well-being and health and safety. Awareness raising begins at enrolment and induction involving students, staff and parents.

22. Safeguarding Information for Learners

All learners know that we have staff with responsibility for safeguarding and know who they are. We inform learners of whom they might talk to, their right to be listened to and what steps can be taken to protect them from harm. We make learners aware of these arrangements through appropriate tutorial provision, induction and information on Moodle.

College's arrangements for consulting with and listening to learners are clearly outlined in the Learner Involvement Policy. The college consults with learners to identify and address their safeguarding and health and safety concerns.

All learners will wear a college student lanyard and ID badge.

23. Partnership with Parents/Carers

The college shares a purpose with parents to keep children safe from harm and to have their welfare promoted. The college is committed to working with parents positively, openly and honestly ensuring that all parents are treated with respect, dignity and courtesy. The college respects parents' rights to privacy and confidentiality and will not share sensitive information unless given have permission, or it is necessary to do so in order to protect a child.

The college will share with parents any concerns we may have about their child unless to do so may place a child at risk of harm. The college encourages parents to discuss any concerns they may have with the Safeguarding and Inclusion Manager or Progress Coach. Parents are made aware of our policies upon request and via the website.

24. Confidentiality

In order to meet the needs of children, young people and adults at risk, the College recognises the importance of information sharing between professionals and local agencies.[12]

Fears about sharing information **cannot** be allowed to stand in the way of the need to promote the welfare and protect the safety of children, young people and adults at risk. Inter-agency working and information sharing are vital in identifying and tackling all forms of abuse, it is clear they are especially important to identify and prevent child sexual exploitation.

All suspicions and investigations are kept confidential and shared only with those who need to know. Any information is shared under the guidance of the Local Safeguarding Partnerships. Consent to share information is obtained prior to information sharing, except where a young person or adult at risk is at risk from harm.

Electronic records are kept on the college's ProMonitor system; however, these do not contain the details of referrals as this is confidential. Notes are made to show there has been Safeguarding staff involvement.

[12] Information sharing: Advice for practitioners providing safeguarding services to children, young people, parents and carers March 2015

25. Written Records

All concerns, discussions and decisions made, and the reasons for those decisions, should be recorded in writing.

Records should include:

- a clear and comprehensive summary of the concern;
- details of how the concern was followed up and resolved;
- a note of any action taken, decisions reached and the outcome

The nominated member of staff shall retain a copy of:

- Any reports
- Any notes, memoranda or other correspondence dealing with the matter
- Any other relevant materials

The nominated member of staff will also keep copies of Children in Care Statutory Reviews, risk assessments, YJS behaviour plans, etc.

Records are electronic where possible and held on a shared drive, with limited user access. Paper copies will be securely destroyed once electronic versions are uploaded.

Copies of paper reports, notes etc. if held are stored in a securely locked filing cabinet within the college archives, keys are held by the Dedicated Safeguarding Lead and the Deputy Safeguarding Lead. They are kept for a minimum period of 7 years (or until learners reach the age of 25). Copies of reports regarding allegations made against staff shall be kept securely sealed by the Principal until the member of staff's normal retirement age or for a period of 10 years from the date of allegation if that is longer.

26. Legislation and Guidance

These procedures are driven by Government legislation.

Reporting arrangements:

The college arrangements continue in line with our Safeguarding Policy.

Please report via ProMonitor or to safeguarding@wvr.ac.uk

The Designated Safeguarding Lead is:

Charlotte Barratt	✉ cbarratt@wvr.ac.uk

The Deputy Designated Safeguarding Leads are:

Rebecca Welch	☎ 01925 494645	✉ rwelch@wvr.ac.uk
Helen Stanley	☎ 07866 986 812	✉ hstanley@wvr.ac.uk
Nikky Bradley	☎ 07860 919 104	✉ nbradley@wvr.ac.uk

The Safeguarding Officers are:

Kerrie Wild	☎ 07860 919113	✉ kwild@wvr.ac.uk
Alexandra Roscoe	☎ 07990 778080	✉ ARoscoe@wvr.ac.uk
Elisa Narborough	☎ 07860 919112	✉ enarborough@wvr.ac.uk

Additional Key Contacts

Nichola Newton	Principal and CEO	✉ nnewton@wvr.ac.uk
Andrew Bainbridge	Chair of Governors	✉ abainbridge@wvr.ac.uk
Lucy Gardiner	Governor for Safeguarding	✉ lucy.gardner5@nhs.net

We will be operating during normal business hours, 8.30am – 5pm (Mon – Thurs) and 8.30am – 4.30pm (Friday).

We have confirmed the arrangements to contact the LADO at the local authorities remain unchanged:

- Warrington: LADO@warrington.gov.uk
- Cheshire West: safeguardinglado@cheshirewestandchester.gov.uk

Staff will continue to follow the safeguarding procedures and advise the safeguarding leads immediately about concerns they have about any child, whether in college or not.

If you have access to ProMonitor please continue to log confidential comments as you normally would. If you do not have access to ProMonitor to log confidential comments, please email concerns to safeguarding@wvr.ac.uk where a member of the safeguarding

team will respond to the concern and log on On Track. This email address is monitored by all safeguarding staff.

Normal safeguarding procedures apply for referrals to children's services. This contact will go through a member of the safeguarding team (listed above) who will follow appropriate measures in seeking the appropriate and necessary support. Out of hours guidance can be found in the Safeguarding Guidance 2019-20 and also here: https://www.warrington.gov.uk/mars

Allegations or concerns about staff

With such different arrangements in place, young people could be at greater risk of online abuse. We remind all staff to maintain the view that 'it could happen here' and to immediately report any concern, no matter how small, to the safeguarding team.

Any agency staff or volunteers working with students during college closure will complete an induction to ensure they are aware of the risks and know how to take action if they are concerned.

New staff or volunteers

All new starters must have an online induction. They must read the college Safeguarding and Prevent Policy including this annex, the Student Disciplinary and Positive Behaviour Management Procedures, the Whistleblowing Procedures and the Staff Code of Conduct. The DSL or deputy will ensure new recruits know who to contact if they have concerns about a child or young person and ensure that new starters are familiar with the child protection procedure. All new starters or volunteers will be required to confirm that they have read Part 1 and Annex A of Keeping Children Safe in Education

Child on child abuse (Formally peer on peer)

We recognise the potential for abuse to go on between young people, especially in the context of a college closure or partial closure. Our staff will remain vigilant to the signs of child-on-child abuse, including those between young people who are not currently attending our provision. Extra care should be taken where groups have mixed age, developmental stages, are attending other education establishments as an interim measure and similar. When making contact with these families our staff may ask about relationships between learners.

Staff can access further guidance here:

Safeguarding and remote education - GOV.UK (www.gov.uk) and Providing remote education: guidance for schools - GOV.UK (www.gov.uk). The NSPCC also provide helpful advice - Undertaking remote teaching safely.

Students accessing remote learning will receive guidance on keeping safe online and know how to raise concerns with the college, Childline, the UK Safer Internet Centre and CEOP.

https://www.nspcc.org.uk/keeping-children-safe/online-safety/internet-connected-devices/

Mental Health

Restrictions to movement and contact with other people means pupils are more likely to be at risk of mental health problems. Individual colleges should make pupils and their families aware of where further support can be found. The Department for Education have produced guidance to support parents:

https://www.gov.uk/government/publications/covid-19-guidance-on-supporting-children-and-young-peoples-mental-health-and-wellbeing/guidance-for-parents-and-carers-on-supporting-children-and-young-peoples-mental-health-and-wellbeing-during-the-coronavirus-covid-19-outbreak

The following organisations can also provide support:

www.kooth.com – Free online emotional wellbeing and counselling with self-help articles

https://www.mind.org.uk/information-support/coronavirus-and-your-wellbeing

https://www.mind.org.uk/information-support/helping-someone-else/

Calm Harm App – A phone app providing help for those who use self-harm as a coping strategy; https://calmharm.co.uk/

Parents and Carers

Parents and carers will receive information about keeping students safe online with peers, the college, other education offers they may have access to and the wider internet community. We have set out the college's approach, including the online platform which students will be asked to access. We have also provided details on the College staff members who students will be interacting with online.

Parents will be offered the following links:

- Internet matters - for support for parents and carers to keep their children safe online
- Net-aware - for support for parents and carers from the NSPCC
- Parent info - for support for parents and carers to keep their children safe online
- Thinkuknow - for advice from the National Crime Agency to stay safe online
- UK Safer Internet Centre - advice for parents and carers

Free additional support is available for staff which supports with advice on responding to online safety issues. This can be accessed from the Professionals Online Safety Helpline at the UK Safer Internet Centre.

Appendix A – DFE Keeping Children Safe in Education 2026

Part one: Safeguarding information for all staff

What school and college staff should know and do

A child centred and coordinated approach to safeguarding

1. Schools and colleges and their staff are an important part of the wider safeguarding system for children. This system is described in the statutory guidance Working Together to Safeguard Children.

2. Safeguarding and promoting the welfare of children is everyone's responsibility. 'Children' includes everyone under the age of 18. Everyone who comes into contact with children and their families has a role to play. In order to fulfil this responsibility effectively, all practitioners should make sure their approach is child centred. This means that they should consider, at all times, what is in the best interests of the child.

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

The role of school and college staff

4. School and college staff are particularly important, as they are in a position to identify concerns early, provide help for children, promote children's welfare and prevent concerns from escalating.

5. All staff have a responsibility to provide a safe environment in which children

can learn.

6. All staff should be prepared to identify children who may benefit from Family Help.[1] Family Help means providing support as soon as a problem emerges at any point in a child's life, from the foundation years through to the teenage years.

7. Any staff member who has any concerns about a child's welfare should follow the processes set out in paragraphs 57-63. Staff should expect to support social workers and other agencies following any referral.

8. Every school and college should have a designated safeguarding lead who will provide support to staff to carry out their safeguarding duties and who will liaise closely with other services such as local authority children's social care.

9. The designated safeguarding lead (and any deputies) are most likely to have a complete safeguarding picture and be the most appropriate person to advise on the response to safeguarding concerns.

10. The Teachers' Standards 2012 state that teachers (which includes headteachers) should safeguard children's wellbeing and maintain public trust in the teaching profession as part of their professional duties.[2]

What school and college staff need to know

11. All staff should be aware of systems within their school or college which support safeguarding, and these should be explained to them as part of staff induction. This should include the:

- child protection policy (which should amongst other things also include the policy and procedures to deal with child-on-child abuse)
- behaviour policy (which should include measures to prevent bullying, including cyberbullying, prejudice-based and discriminatory bullying).[3]
- staff behaviour policy (sometimes called a code of conduct) should amongst other things, include low-level concerns, allegations against staff and whistleblowing
- safeguarding response to children who are absent from education, particularly on repeat occasions and/or prolonged periods and

[1] Detailed information on family help can be found in Working Together to Safeguard Children.

[2] Teachers' standards - GOV.UK (www.gov.uk)

[6]3All schools are required to have a behaviour policy (full details are here). If a college chooses to have a behaviour policy it should be provided to staff as described above.

- role of the designated safeguarding lead (including the identity of the designated safeguarding lead and any deputies).

Copies of policies and a copy of Part one (or Annex A, if appropriate) of this document should be provided to **all** staff at induction.

12. All staff should receive appropriate safeguarding and child protection training (including online safety which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring – see para 140 for further information) at induction. The training should be regularly updated. In addition, all staff should receive safeguarding and child protection (including online safety) updates (for example, via email, e-bulletins, and staff meetings), as required, and at least annually, to continue to provide them with relevant skills and knowledge to safeguard children effectively.

13. All staff should be aware of the process for community-based Family Help Assessments:

- The criteria, including the level of need, for when a case should be referred to Family Help support and services provided at:
  - Targeted early help level (under section 10 and 11 of the Children Act 2004), and
  - Statutory services delivered under section 17 of the Children Act 1989 (children in need, including how this applies to disabled children)
- The criteria, including the level of need, for when a case should be referred to local authority children's social care for assessment and for statutory services under Section 47 of the Children Act 1989 (reasonable cause to suspect a child is suffering or likely to suffer significant harm)
  - Section 31 of the Children Act 1989 (care and supervision orders), and
  - Section 20 of the Children Act 1989 (duty to accommodate a child)
- And clear procedures and processes for cases relating to:
  - the abuse, neglect and exploitation of children
  - children managed within the youth secure estate
  - disabled children
  -

14. All staff should know what to do if a child tells them they are being abused, exploited, or neglected. Staff should know how to manage the requirement to maintain an appropriate level of confidentiality. This means only involving those who need to be involved, such as the designated safeguarding lead (or a deputy) and local authority children's social care. Staff

should never promise a child that they will not tell anyone about a report of any form of abuse, as this may ultimately not be in the best interests of the child.

15. All staff should be able to reassure victims that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting any form of abuse and/or neglect. Nor should a victim ever be made to feel ashamed for making a report.

16. All staff should be aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. For example, children may feel embarrassed, humiliated, or are being threatened. This could be due to their vulnerability, disability and/or sexual orientation or language barriers. This should not prevent staff from having a professional curiosity and speaking to the designated safeguarding lead (or a deputy) if they have concerns about a child. It is also important that staff determine how best to build trusted relationships which facilitate communication with children and young people.

17. All staff should recognise that children may experience prejudice-based harm, including racism, faith-based prejudice, and other forms of discrimination. Such experiences may affect a child's welfare, wellbeing, mental health, and willingness to seek help. Staff should be alert to the signs and impact of prejudice-based harm and ensure that concerns are considered within safeguarding practice where appropriate.

What school and college staff should look out for

Support before statutory intervention

18. Any child may benefit from support before statuory intervention including universal services and community based Early Help, or the targeted early help level of Family Help. All school and college staff should be particularly alert to the potential need for early help for a child who:

- is disabled or has certain health conditions and has specific additional needs
- has special educational needs (whether or not they have a statutory Education, Health and Care plan)
- has a mental health need
- is a young carer
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines
- is frequently missing/goes missing from education, home or care,
- has experienced multiple suspensions, is at risk of being permanently

excluded from schools, colleges and in Alternative Provision or a Pupil Referral Unit.

- is at risk of modern slavery, trafficking, sexual and/or criminal exploitation
- is at risk of being radicalised or exploited
- has a parent or carer in custody, or is affected by parental offending
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- is misusing alcohol and other drugs themselves
- is at risk of so-called 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage
- is a privately fostered child.

Abuse, neglect and exploitation

19. All staff should be aware of the indicators of abuse, neglect and exploitation (see below), understanding that children can be at risk of harm inside and outside of the school/college, inside and outside of home, and online. Exercising professional curiosity and knowing what to look for is vital for the early identification of abuse and neglect so that staff are able to identify cases of children who may be in need of help or protection.

20. All school and college staff should be aware that abuse, neglect, exploitation, and safeguarding issues are rarely standalone events and cannot be covered by one definition or one label alone. In most cases, multiple issues will overlap.

21. All staff, but especially the designated safeguarding lead (and deputies) should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual abuse (including harassment and exploitation), domestic abuse in their own intimate relationships (teenage relationship abuse), criminal exploitation, serious youth violence, county lines and radicalisation.

22. All staff should be aware that technology is a significant component in many safeguarding and wellbeing issues. Children are at risk of abuse and other risks online as well as face to face. In many cases abuse and other risks will take place concurrently both online and offline.

23. Children can also abuse other children online, this can take the form of abusive, harassing, and misogynistic/misandrist messages, the non-consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography to those who do not want to receive such content.

24. ***In all cases, if staff are unsure, they should always speak to the designated safeguarding lead or a deputy.***

Indicators of abuse and neglect

25. **Abuse**: a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children. Children may also cause harm to other family members, often referred to as child to parent or care giver abuse.

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

27. **Emotional abuse**: the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning or preventing the child 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.

28. Sexual abuse: involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education and all staff should be aware of it and of their school or college's policy and procedures for dealing with it. There are specific offences for children under 13, who can never provide valid consent to sexual activity and there are specific offences which make clear that sexual activity involving a child under 16 is an offence, regardless of whether they agreed to that activity.

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

Safeguarding issues

30. All staff should have an awareness of safeguarding issues that can put children at risk of harm (including but not limited to those listed below). The following behaviours and indicators can be signs that children are at risk:

- drug taking and/or alcohol misuse,
- unexplainable and/or persistent absences from education
- serious violence, criminal exploitation (including that linked to county lines), radicalisation and
- consensual and non-consensual making or sharing of nudes or semi nudes.

Additional information on these safeguarding issues and information on other safeguarding issues is included in the Annex.

Child-on-child abuse

31. All staff should be aware that children can abuse other children (often referred to as child-on-child abuse), and that it can happen both inside and outside of school or college and online. All staff should be clear as to the school or college's policy and procedures with regard to child-on-child abuse and the important role they have to play in preventing it and responding where they believe a child may be at risk from it.

32. All staff should recognise that racism, faith-targeted abuse, and other forms of discriminatory behaviour may have a significant impact on a child's welfare, well-being and sense of safety and should be considered within safeguarding practice where appropriate.

33. All staff should understand that even if there are no reports in their schools or colleges it does not mean it is not happening. It may be the case that abuse is not being reported. As such it is important that when staff have **any** concerns regarding child-on-child abuse they should speak to their designated safeguarding lead (or a deputy). As part of this, schools should also try to be alert to when children might be at highest risk around the school day (for examples immediately after school).

34. It is essential that **all** staff understand the importance of challenging inappropriate behaviours between children that are abusive in nature. Examples of which are listed below. Downplaying certain behaviours, for example dismissing sexual harassment as "just banter", "just having a laugh", "part of growing up" or "boys being boys" can lead to a culture of unacceptable behaviours, misogyny, an unsafe environment for children and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it.

35. **All** staff should be aware that child-on-child abuse is a safeguarding issue for both the victim and alleged perpetrator.

36. As well as knowing how to respond to concerns, **all** staff should know that child-on-child abuse is preventable. As well as knowing how to recognise behaviours and indicators of risk early, staff should know that

timely, evidence-based support can be key to preventing children from going on to commit abuse or violence.

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

- bullying(includingcyberbullying,prejudice-basedanddiscriminatorybullying),
- discriminatory behaviour, including racism,faith-targeted abuse, and other prejudice-based incidents,
- abuse in intimate personal relationships between children (sometimes known as 'teenage relationship abuse'),
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse),
- serious physical assault and harm, or the threat of harm with a weapon,
- sexualviolence[4]such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence),
- sexual harassment[5]such as sexual comments, remarks, jokes and online sexual harassment, which maybe stand alone or part of a broader pattern of abuse,
- causing some one 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,
- consensualandnon-consensualmakingorsharingofnudesandsemi-nudes[6],
- upskirting[7]which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or alarm, and
- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element.)

[4]For further information about sexual violence see Part five.
[5]For further information about sexual harassment see Part five.
[6]UKCISguidance: Sharingnudesandsemi-nudesadviceforeducationsettings
[7]For further information about 'upskirting' see the Annex.

Child criminal exploitation (CCE) and child sexual exploitation (CSE)

38. Both CCE and CSE are forms of abuse that occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in criminal or sexual activity. It may involve an exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. This can be committed or facilitated by an organised network or gang, and the victim may identify as being part of this group. CCE and CSE can affect children, both male and female, and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation. This may constitute modern slavery, and further information is available in the Modern Slavery statutory guidance. In accordance with this guidance, a relevant child protection and modern slavery referral should be completed where a potential victim of CCE or CSE is identified.

Child criminal exploitation (CCE)8

39. Some specific forms of CCE can include children being forced or manipulated into transporting drugs or money through county lines9, working in cannabis factories, shoplifting or pickpocketing. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others.

40. Children can become trapped by this type of exploitation, as perpetrators can threaten victims (and their families) with violence or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others. Children who are criminally exploited should have their vulnerabilities recognised by adults and professionals (particularly older children) and should be treated as victims. It is not possible for a child to consent to be exploited, abused or trafficked, and they may not recognise that it is happening to them.

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

8 See information on CCE definition on page 48 of Home Office's Serious Violence Strategy

9 County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs using dedicated mobile phone lines or other form of “deal line”. Links to the Home Office’s County Lines advice is provided within the serious violence information on page 171 of KCSIE.

Child sexual exploitation (CSE)

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

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

44. 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. This can be committed by an individual or an organised network10 and most sexual abuse is committed by those previously known to the victim. Some children do not realise they are being exploited and may believe they are in a genuine romantic relationship. As with CCE, victims are not always recognised and can be criminalised for actions they take whilst under coercion. This remains a significant concern, as professionals continue to encounter cases where children are manipulated, groomed, and exploited without fully understanding the abuse they are experiencing.

Domestic abuse

45. 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. 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, well-being, and ability to learn.

Female genital mutilation (FGM)

46. Whilst all staff should speak to the designated safeguarding lead (or a deputy) with regard to any concerns about female genital mutilation (FGM), there is a specific legal duty on teachers.11 If a teacher, in the course of their work in the profession, discovers that an act of FGM appears to have been carried out on a girl under the age of 18, the teacher must report this to the police. See page 176 of KCSIE for further information.

Mental health

47. All staff should be aware that mental health problems can, in some cases, develop into safeguarding concerns. This could include self-harm, suicidal ideation or risk of suicide. They could also be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

48. Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Education staff, however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one. If a child is struggling with their mental health, self-harming, has an eating disorder or is experiencing suicidal ideation and making plans to end their life, there are likely to be potential warning signs which education staff are well placed to recognise.

These could include:

- significant changes in behaviour,
- ongoing difficulty sleeping,
- withdrawing from social situations,
- not wanting to do things they usually like, and
- physical signs of self-harm or neglecting themselves.

49. Not every child who exhibits these behaviours is suicidal or has a mental health concern. However, by identifying these and other potential warning signs, education staff can identify children who may be struggling with their mental health and contemplating suicide and offer support and vital early intervention. Schools and colleges should ensure that any interventions they offer are evidenced as safe and effective and appropriate for the need and phase of education.

50. If staff have a concern about a child's mental health that is also a safeguarding concern, they should follow their child protection policy and speak to their designated safeguarding lead or deputy. If staff feel that a child is in danger, they should call 999 or arrange for them to be taken to A&E immediately by a parent/carer or other suitable person. If a child needs help urgently for their mental health, but it's not an emergency, staff can get help from NHS 111 online or call 111 and select the mental health option.

Serious violence

51. Serious violence is a continuing safeguarding concern. It may involve physical assault, carrying, threatening with, or using weapons, often in the context of peer conflict or bullying, and it can also be associated with criminal exploitation. Staff should report any concerns about a child carrying or using a weapon (or expressing intent to do so) to the designated safeguarding lead (or a deputy). The designated safeguarding lead should assess the risk to both the individual pupil and others in the school, considering wider information or concerns, and take appropriate action. Depending on the risk, they should put in place a safety and support plan, and where relevant, consider action to de-escalate peer conflict.

52. Schools play a key role in protecting children from violence, safeguarding victims, as well as those who may be at risk of, or are involved in committing violence (who may also be victims themselves). Staff should be alert to signs that a child may be at risk of or involved in serious violence. These risks are higher for children with disrupted education (e.g. suspensions, permanent exclusions, time in alternative provision) or a history of offending. Schools should also try to be alert to when children might be at highest risk around the school day (for example, immediately after school). Further information on indicators, risk factors, and protective actions relating to serious violence is provided in the Annex.

53. Early, evidence-based support for those considered at risk, as well as at critical points when concerns emerge, is vital. This includes access to trusted adults, social and emotional skill support, and, where available, targeted interventions such as mentoring or therapeutic support (practical guidance on evidenced support is available from the Youth Endowment Fund (YEF) (the "what works" centre for preventing violence).

54. Designated safeguarding leads can find further guidance on referrals and when to contact the police in Annex B of KCSIE (Manage Referrals).

Additional information and support

55. Departmental advice What to do if you're worried a child is being abused: advice for practitioners provides more information on understanding and identifying abuse and neglect. Examples of potential indicators of abuse and neglect are highlighted throughout that advice and will be particularly helpful for school and college staff. The NSPCC website also provides useful additional information on abuse and neglect and what to look out for.

56. The Annex contains important additional information about specific forms of abuse, exploitation, and safeguarding issues. School and college leaders and those staff who work directly with children should read the Annex.

What school and college staff should do if they have concerns about a child

57. Staff working with children are advised to maintain an attitude of 'it could happen here' where safeguarding is concerned. When concerned about the welfare of a child, staff should always act in the best interests of the child.

58. If staff have any concerns about a child's welfare, they should act on them immediately. See page 25 for a flowchart setting out the process for staff when they have concerns about a child.

59. If staff have a concern, they should follow their own organisation's child protection policy and speak to the designated safeguarding lead (or a deputy).

60. Options will then include:

- managing any support for the child internally via the school or college's own pastoral support processes, including considering where doing so does not place the child at additional risk, whether the designated safeguarding lead (or a deputy) should inform parents or carers to further support the child's wellbeing,
- undertaking a Family Help assessment,12 or
- making a referral to statutory services,13 for example as the child could be in need, is in need or is suffering, or likely to suffer harm.

61. The designated safeguarding lead (or a deputy) should always be available to discuss safeguarding concerns. If in exceptional circumstances, the designated safeguarding lead (or a deputy) is not available, this should not delay appropriate action being taken. Staff should consider speaking to a member of the senior leadership team and/or take advice from local authority children's social care. In these circumstances, any action taken should be shared with the designated safeguarding lead (or a deputy) as soon as is practically possible.

62. Staff should not assume a colleague or another professional will take action and share information that might be critical in keeping children safe. They should be mindful that early information sharing is vital for the effective identification, assessment, and allocation of appropriate service provision, whether this is when problems first emerge, or where a child is already known to local authority children's social care (such as a child in need or a child with a protection plan). Information sharing: advice for practitioners providing safeguarding services to children, young people, parents and carer supports staff who have to make decisions about sharing information.

63. **Data protection laws do not prevent the sharing of information for the purposes of keeping children safe and promoting their welfare.** If in any doubt about sharing information, staff should speak to the designated safeguarding lead (or a deputy). Fears about sharing information **must not** be allowed to stand in the way of the need to safeguard and promote the welfare of children.

Community-based Early Help assessment

64. If children do not require the support of statutory children's services, the designated safeguarding lead (or a deputy) will generally lead the liaison with other agencies and setting up an inter-agency assessment as appropriate. Staff may be required to support other agencies and professionals in carrying out this assessment, in some cases acting as the lead practitioner. Further guidance on effective assessment of the need for Family Help can be found in Working Together to Safeguard Children. Any such cases should be kept under constant review and consideration given to a referral to local authority children's social care for assessment for statutory services if the child's situation does not appear to be improving or is getting worse. Alternatively, qualified lead practitioners (i.e. not a social worker) who may lead assessments before statutory intervention can continue to lead work with families up to and including section 17.

Statutory children's social care assessments and services

65. 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, (see when to call the police: guidance for schools and colleges (npcc.police.uk)) is made immediately. Referrals should follow the local referral process.

66. Local authority children's social care assessments should consider where children are being harmed in contexts outside of the home14, so it is important that schools and colleges provide as much information as possible as part of the referral process. This will allow any assessment to consider all the available evidence and enable a contextual approach to address such harm. Additional Information is available here: Contextual Safeguarding.

67. The online tool Report child abuse to your local council directs to the relevant local authority children's social care contact details.

Children in need

68. 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. As outlined in Working Together to Safeguard Children, local authorities, with their safeguarding partners and any relevant agencies, should develop, agree and publish local protocols for assessments and support. This should set out who can act as lead practitioner in supporting children and their families under section 17 (which is not limited to social workers).

Children suffering or likely to suffer significant harm

69. Local authorities, with the help of other organisations as appropriate, have a duty to make enquiries under section 47 of the Children Act 1989 if they have reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm. Such enquiries enable them to decide whether they should take any action to safeguard and promote the child's welfare and must be initiated where there are concerns about maltreatment. This includes all forms of abuse, neglect and exploitation.

What will the local authority do?

70. Within one working day of a referral being made, a local authority social worker should acknowledge its receipt to the referrer and make a decision about the next steps and the type of response that is required. This will include determining whether:

- the child requires immediate protection and urgent action is required,
- any services are required by the child and family and what type of services,
- the child is in need and should be assessed under section 17 of the Children Act 1989.

Working Together to Safeguard Children provides details of the assessment process,

- there is reasonable cause to suspect the child is suffering or likely to suffer significant harm, and whether enquiries must be made, and the child assessed under section 47 of the Children Act 1989. Working Together to Safeguard

Children provides details of the assessment process, and

- further specialist assessments are required to help the local authority to decide what further action to take.

71. The referrer should follow up if this information is not forthcoming.

72. If social workers decide to carry out a statutory assessment, staff should do everything they can to support that assessment, supported by the designated safeguarding lead (or a deputy) as required.

73. If, after a referral, the child's situation does not appear to be improving, the referrer should consider following local escalation procedures to ensure their concerns have been addressed and, most importantly, that the child's situation improves.

Record keeping

74. All concerns, discussions and decisions made, and the reasons for those decisions, should be recorded in writing. This will also help if/when responding to any complaints about the way a case has been handled by the school or college. Information should be kept confidential and stored securely. It is good practice to keep concerns and referrals in a separate child protection file for each child.

Records should include:

- a clear and comprehensive summary of the concern
- details of how the concern was followed up and resolved, and
- a note of any action taken, decisions reached and the outcome.

75. If in doubt about recording requirements, staff should discuss with the designated safeguarding lead (or a deputy).

Why is all of this important?

76. It is important for children to receive the right help at the right time to address safeguarding risks, prevent issues escalating and to promote children's welfare. Research and local child safeguarding practice reviews have repeatedly shown the dangers of failing to take effective action.Working Together to Safeguard Children. 15 Further information about local child safeguarding practice can be found in

Examples of poor practice include:

- failing to act on and refer the early signs of abuse and neglect,
- poor record keeping,
- failing to listen to the views of the child,
- failing to re-assess concerns when situations do not improve,
- not sharing information with the right people within and between agencies,
- sharing information too slowly, and
- a lack of challenge to those who appear not to be taking action.

What school and college staff should do if they have a safeguarding concern or an allegation about another staff member

77. Schools and colleges should have processes and procedures in place to manage any safeguarding concern or allegation (no matter how small) about staff members (including supply staff, trainee teachers, volunteers, and contractors).

78. If staff have a safeguarding concern or an allegation of harming or posing a risk of harm to children is made about another member of staff (including supply staff, trainee teachers, volunteers, and contractors), then:

- this should be referred to the headteacher or principal, who will consider whether an onward referral to the LADO is required,
- where there is a concern/allegation about the headteacher or principal, this should be referred to the chair of governors, chair of the management committee or proprietor of an independent school, and

- in the event of a concern/allegation about the headteacher, where the headteacher is also the sole proprietor of an independent school, or a situation where there is a conflict of interest in reporting the matter to the headteacher, this should be reported directly to the LADO(s). Details of your local LADO should be easily accessible on your local authority's website.

79. If staff have a safeguarding concern or an allegation about another member of staff (including supply staff, trainee teachers, volunteers or contractors) that does not meet the harm threshold, then this should be shared in accordance with the school or college's low-level concerns policy. Further details can be found in Part four of this guidance.

What school or college staff should do if they have concerns about safeguarding practices within the school or college

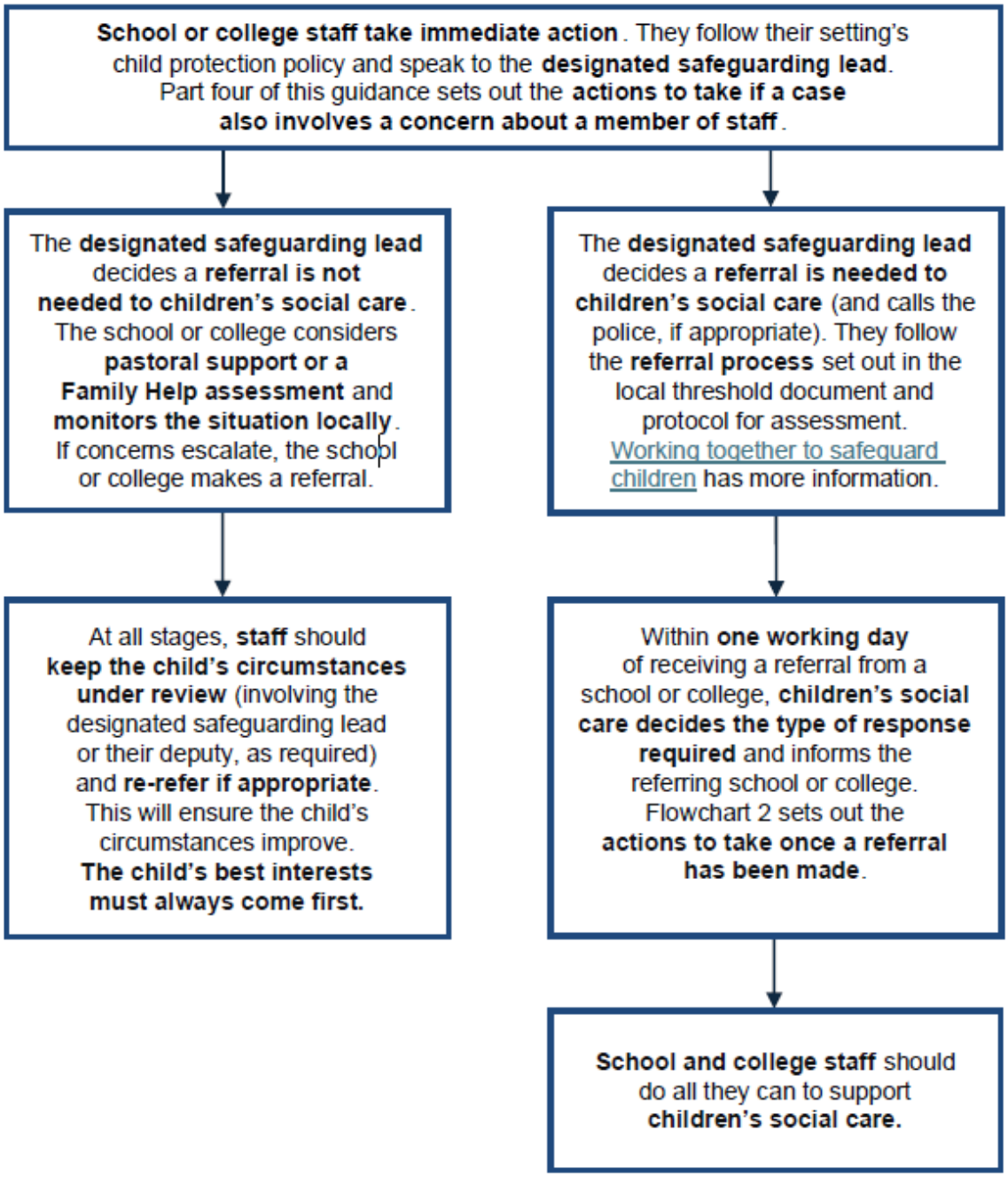
80. All staff and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in the school or college's safeguarding provision and know that such concerns will be taken seriously by the senior leadership team.

81. Appropriate whistleblowing procedures should be put in place for such concerns to be raised with the school or college's senior leadership team.

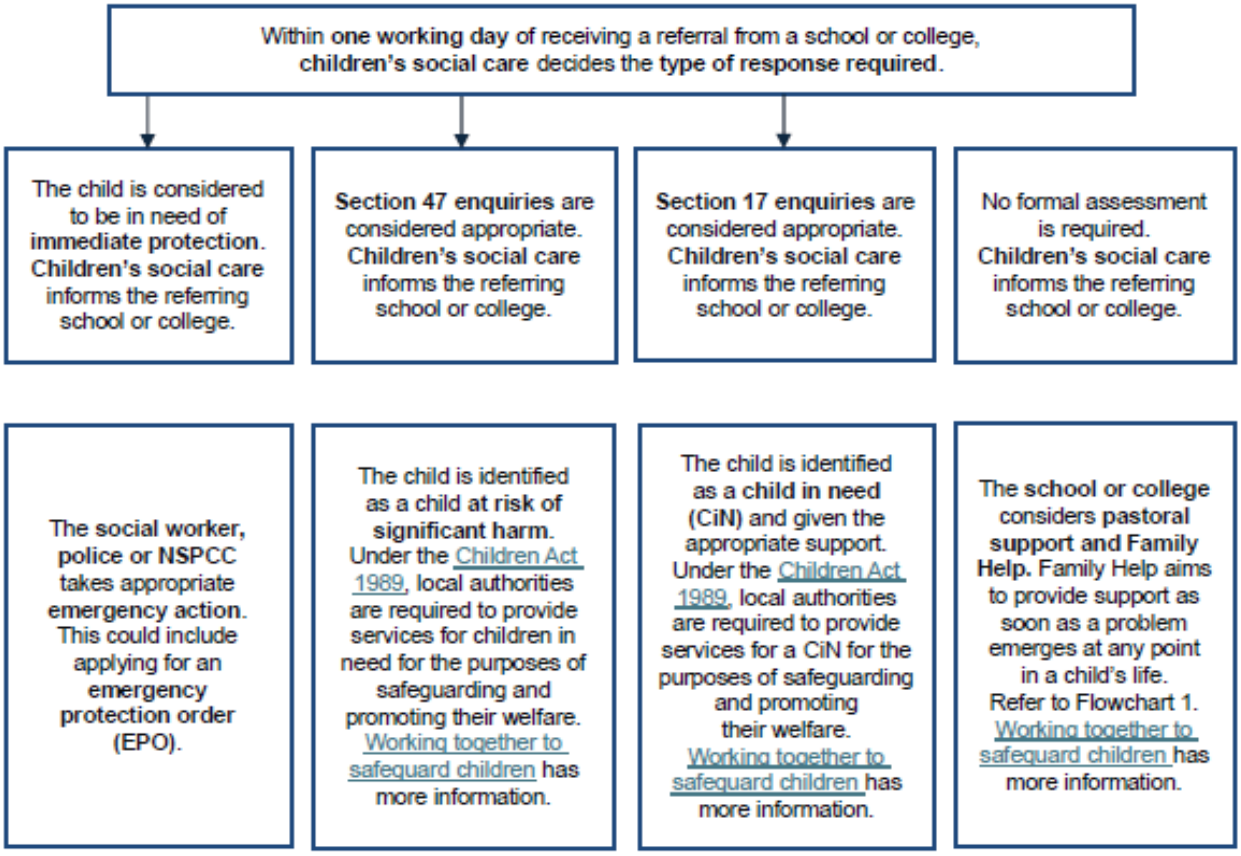
82. Where a staff member feels unable to raise an issue with their employer, or feels that their genuine concerns are not being addressed, other whistleblowing channels are open to them:

- general advice on whistleblowing can be found at whistleblowing for employees, and
- the NSPCC Whistleblowing Advice Line is available as an alternative route for staff who do not feel able to raise concerns regarding child protection failures internally or have concerns about the way a concern is being handled by their school or college. Staff can call 0800 028 0285 – and the line is available from 09:00 to 20;00 Monday to Friday and 09:00 to 18:00 at weekends. The email address is help@nspcc.org.uk

Flowchart 1: actions taken by a school or college when there are concerns about a child



Flowchart 2: actions taken once a referral has been made to children's social care



Appendix B - Radicalisation & PREVENT Strategy

'The Prevent Duty' - All schools and colleges are subject to a duty under section 26 of the Counter Terrorism Act 2015, in the exercise of their functions, to have 'due regard' to the need to prevent people from being drawn into terrorism. This is known as the Prevent duty.

1) Introduction

The College is committed to providing students with the necessary skills and knowledge to keep themselves and others safe. Education, like other key sectors, has a responsibility to promote values of openness and tolerance and to facilitate free debate which is characteristic of being a British citizen. It is in this context that the College provides a 'Radicalisation and PREVENT Strategy'.

The College's strategy is formed from the National Strategy known as CONTEST. It has four elements Pursue, Protect, Prepare and PREVENT. The area in which colleges have the most influence is PREVENT which aims to stop people becoming terrorists or supporting terrorism.

2) Context

The aim of this strategy is to:

- Identify and assess the risks that learners may face
- Ensure external speakers and events are appropriately risk assessed
- Develop and regularly update the Prevent action plan in order to mitigate risk
- Establish effective partnerships in order to comply with the Prevent duty
- Ensure appropriate training is available for all staff across the College
- Embed the Prevent duty through the exemplifying of British Values throughout curriculum and the tutorial process
- Ensure appropriate welfare support is in place for learners
- Ensure existing policies and procedures including Equality and Diversity and the IT policies make specific reference to the duty
- Appropriate steps are taken to ensure the monitoring and enforcement of the duty
- Ensure there is a clear response to concerns, including referral to Channel
- Develop an awareness of PREVENT in the College
- Recognise current practice which contributes to the PREVENT agenda
- Identify areas for improvement
- To contribute to the development of a coordinated action plan

3) Local Partnerships

The College maintains partnerships, including Local Authorities, the Cheshire Counter Terrorism Unit and Prevent Police Officer to receive regular updates in order to keep staff and students safe and well informed.

4) College

PREVENT sits within the realm of the college's Safeguarding Policy. All staff are trained and regularly updated on the Policy and associated professional practice and conduct.

Whilst PREVENT sits within the College Safeguarding Policy and procedures, it is also integral to other policies, such as:

- Equality and Diversity
- IT Policies
- Health and Safety
- Anti-Bullying
- Tutorial

Issues related to radicalisation are included in safeguarding reports to Corporation.

5) Staff

All staff receive awareness training on an on-going basis ensuring that they are up to date with PREVENT matters.

All staff are responsible for responding appropriately to students with challenging and inappropriate behaviour. Staff will be supported and use the skills required to challenge appropriately, as part of this strategy.

6) Students

Students will receive awareness training on radicalisation and how to protect themselves through the tutorial system. British Values are embedded and promoted throughout all aspects of learners programmes at College.

Appendix C - Keeping Apprentices Safe

At Warrington and Vale Royal College we take our responsibility to ensure the safety of our students very seriously. This also extends to our students who have chosen to study as part of an apprenticeship programme. We are committed to working with our employers and apprentices to create a fantastic learning experience, and to ensure the highest levels of apprentice safety and wellbeing.

Our Approach

The college has a clear commitment to safeguarding which is overseen by a dedicated safeguarding team led by the Dedicated Safeguarding Lead, currently the Vice Principal: Quality & MIS ~~Director of Student Support~~. As a team they promote and implement the Safeguarding Policy, ensuring it is reviewed regularly and acted upon.

Additionally, all members of staff including those working with apprentices are trained in safeguarding.

Employers Duty

Employers have a duty to comply with all current and future UK legislation and statutory responsibilities. There is a particular expectation that an employer should take responsibility for an apprentice's welfare in the workplace and to also seek appropriate advice when they feel and apprentice may be a t risk in their personal lives.

We appreciate that for many organisations this can be a confusing and complex area. The following information is made available to employers and explains the different support college provides, and also some of the ways in which employers can incorporate information into their current internal procedures.

1. Safeguarding

Safeguarding is the overarching term used to describe the protection of the health, wellbeing and human rights of individuals. Under legislation, all parties involved in an apprenticeship have to take reasonable action to minimise risks to apprentices. This includes aspects of the apprentice's experience, both in and outside of the workplace, as well as during attendance at college.

Many areas are considered to fall under the definition of safeguarding, including:

- Abuse (emotional and physical)
- Bullying (including online)
- Discrimination
- Forced Marriage
- Mental Health
- Neglect and Self-Harm
- Radicalisation and Extremism

The College's Role:

- Ensure that employers are aware of their safeguarding obligations, through guidance and training.
- Ensure apprentices have an awareness of safeguarding and understand how to access college support services.
- Provide safeguarding training for all college employees working with apprentices
- Ensure college staff working with young and vulnerable people are subject to an enhanced Disclosure and Barring Service check.
- Maintain open channels of communication with each employer. Apprentices may act very differently depending upon their environment, and may feel more comfortable discussing sensitive issues with different people.

The Employer's Role:

- Familiarise themselves with relevant government legislation.
- Take appropriate steps to understand what safeguarding means in practice at their organisation, in the context of the responsibilities they have for the people they employ.
- Ensure that any staff working with apprentices in a position of trust are appropriate for the role and do not present any danger or threat.
- If possible, coordinate safeguarding across an organisation.

2. Prevent

As part of the Terrorism and Security Act 2015, colleges are required to pay 'due regard to the need to prevent individuals from being drawn into terrorism'.

There is no single way of identifying a person who may be vulnerable to extremist ideology and it is often the culmination of a number of influences. These can include, family, friends or relationships they have made online. Extremism can include non-violent action.

All apprentices studying on a programme at college will be expected to attend a compulsory session in which these issues will be covered.

The College's Role

- Provide relevant training for college staff so that they understand the obligations the college has under the Prevent Duty and how to manage risks and concerns.
- Have clear procedures in place so that any concerns can immediately be brought to specialist attention.
- Provide a forum for apprentices to explore these matters.
- Provide a contact for any information regarding the Prevent duty.
- Ensure apprentices are able to express views in non-extremist ways and create an environment and encourages respectful free speech.

The Employer's Role

- Demonstrate a commitment to the principles that underpin the Prevent Duty
- Seek specialist support if any concerns are raised.

3. British Values

An important part of Prevent is also the promotion of British values. These are the norm that shape our society and which are enshrined in law, through legislation such as the Equality Act 2010.

British values are described as:

- Democracy
- The rule of law
- Individual liberty and mutual respect
- Tolerance for those with different faiths and beliefs

Apprentices are encouraged to explore ideas in a context where these values are recognised and respected.

The College's Role

- To promote British values throughout an apprentice's programme
- Provided a dedicated programme of study which defines and explores British values and how they influence our society.
- Create opportunities for apprentices to apply their learning to relevant situations and contexts.
- Encourage apprentices to respect each other and their differences, including with regard to protected characteristics outlines in the Equality Act 2010.

The Employer's Role

- Demonstrate a commitment to British values
- Adhere to the requirements of the Equality Act 2010.

4. Safeguarding in Practice

The college is available to you as a resource and if you find that you need support managing a particular scenario please contact us. Some apprentices may feel more comfortable talking to someone outside of your organisation, so we will endeavour to be as transparent as possible with employers, while respecting the apprentices trust and adhering to college confidentiality policies. As always, if we feel a young person is at risk of harm we may need to break confidentiality, but this would be explained to the apprentice.

In many cases someone will not always seek help over a safeguarding issue, but there are common signs which can help you to recognise when things may go wrong.

Warning signs to consider:

- **Absence** - Missing work or not turning up at college
- **Change in appearance**
- **Changes in behaviour and character -** becoming quiet or loud, aggressive or withdrawn.
- **Changes in emotional health -** crying, anxiety or low mood
- **Excessive alcohol consumption**
- **Physical injuries -** cuts or bruises

- **Poor living conditions**
- **Self-harm**
- **Use of drugs**
- **Withdrawing from certain activities** - reluctance to go online, sudden changes in use of technology

It is important to stress that the existence of some of these characteristics is not a definitive sign that anything is wrong.

5. Who to Contact

- **General Support - Apprenticeships**
  Andy Atkin Director of Apprenticeships
  aatkin@wvr.ac.uk
  01925 494303

- **Safeguarding**
  safeguarding@wvr.ac.uk
  01925 494222

- ~~**Safeguarding & Prevent**~~
  ~~**Laura Williams, Director of Student Support**~~
  ~~**lwilliams@wvr.ac.uk**~~
  ~~**01925 494248 or 01925 494222**~~

In an emergency, or when suspecting a serious issue, we recommend contacting the appropriate services/authorities in the first instance, e.g. Police

The referral process for a Prevent concern for Cheshire West and Cheshire is at Refer someone to the Prevent Team | Merseyside Police

Equality/Safeguarding Impact Assessment of:

Safeguarding and Prevent Policy

Who are the Key Stakeholders:

College staff, learners

Identify source of stakeholder views:

Staff, student and external bodies stakeholder meetings

Learner comments from the On Programme and Exit Survey

Audit from WBC and feedback from CWaC

Summarise key messages from stakeholders:

Students did comment that they feel safe in college and they know who to contact for support.

CWaC – feedback update regarding Care Act, amendments made

WBC – Audit undertaken and policy approved

What is the impact on the following:
Have any additional safeguarding risks been identified?

Key characteristics	**Comments**
Age	No significant impact
Disability	No significant impact
Gender	No significant impact
Racial group	No significant impact
Religion or belief	No significant impact
Sexual orientation	No significant impact

Gender re-assignment	No significant impact
Pregnancy and maternity	No significant impact

Is a separate Safeguarding Risk Assessment required No

If yes please complete form SR1 Record of Safeguarding Risk Assessment

No major change needed: **NO**

Adjustment required: **NO**

Stop and remove: **NO**

Actions to be addressed:

Validated by the Equality & Diversity Management Group Date: