

Child Safeguarding & Protection Policy

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Contents

1. Introduction.....	3
2. Purpose of Child Safeguarding	3
3. Scope	3
4. Aims	4
5. Objectives	5
6. Key Contacts	6
7. DBS checks.....	8
8. Safe recruitment procedures	9
9. Sexual Offences Act 2003	9
10. Staff responsible for safeguarding.....	9
11. Safeguarding at UKG	13
12. Letter of Consent	13
13. Accommodation	14
14. Online Safety.....	14
15. Definitions of the four forms of abuse	14
16. Other Specific Safeguarding Issues	16
17. Children Missing From Education	20
18. Homelessness	20
19. Children at Greater Risk of Harm	21
20. Signs of Abuse.....	21
21. Guidance for staff	22
22. Allegations of abuse against staff	23
23. Dealing with Safeguarding Concerns.....	24
24. Effects of abuse	24
25. Responding to the child	24
26. Safe environment	25
27. Code of Behaviour towards Children	26
Risk Assessments	29
28. Whistle blowing protocols.....	29
29. Appendix 1 Guidance on dealing with a disclosure.....	30
30. Appendix 2: UKG Child Abuse Incident Record Form	32
31. Appendix 4 sharing nudes and semi-nudes.....	36
32. Appendix 5 Sexual harassment and sexual violence	43
33. Appendix 6 Staff Declaration	47

1. Introduction

- 1.1. This policy informs all members of UK Graduate (UKG) staff, hosts and any other adults participating in UKG activities that involve working with U18s, on our expectations regarding the safety and well-being of U18s.
- 1.2. The policy has been based on statutory guidance up to and including guidance for schools and colleges by the Department for Education on keeping children safe in education (KCSIE) 1 September 2023. It details how we will protect children from harm or maltreatment or neglect including all forms of abuse as set out in Article 19, UNCRC 1989. The policy also incorporates the key principles of the UK government's green paper on 'Every Child Matters' 2003, and the Children Act 2004, which reinforced that all people and organisations working with children have a responsibility to help safeguard children and promote child welfare across the UK.
- 1.3. This policy has also been informed by local child safeguarding procedures as outlined by the Tower Hamlets Safeguarding Board available to view at:
https://www.towerhamlets.gov.uk/ignl/health_social_care/ASC/Adults_Health_and_Wellbeing/Staying_safe/Safeguarding_Adults_Board.aspx

2. Purpose of Child Safeguarding

- 2.1. Child safeguarding ensures that whatever a child's background or circumstances, including their race, culture, religion, gender, sexuality and/or disability their right to be healthy, stay safe, enjoy and achieve are protected to the best of our ability.

3. Scope

- 3.1. According to Save the Children www.savethechildren.org, 'Child safeguarding refers to a set of policies, procedures and practices employed to make a business safe for all children they work with. Child protection is about making the world safe for children. It refers to actions done to protect specific children from concerns of risk or harm.'
- 3.2. A child is defined as any person under the age of 18. Note that this might include teaching assistants and other assistants or volunteers. In addition to employees/sub-contractors of the College, parents and adult assistants fulfilling nominated roles at College events are agents of the College. All stakeholders of UKG that may come into contact with U18s when participating in UKG activity must read this Child Safeguarding Policy and sign the declaration below stating that they have read it.

4. Aims

The main aims of this policy are to:

- 4.1. Ensure that all children (U18s) attending courses or participating in any activity may thrive in a happy, safe and secure environment.
- 4.2. Enable the College and its staff to meet their statutory responsibility to 'safeguard' the welfare of children (those under 18) in the College.
- 4.3. Ensure all parents, adult assistants and employees/sub-contractors are made aware of the required procedures to ensure the safeguarding of children under the care of UKG stakeholders.
- 4.4. Promote the welfare of children and their support needs.
- 4.5. Provide a safe environment that provides for the welfare and support needs of children
- 4.6. Identify children who are in need or suffering/ likely to suffer significant harm and take appropriate action to make sure they are safe.
- 4.7. Contribute to effective partnership working between all those involved with providing services for children.

5. Objectives

The main objectives for achieving the aims of this policy are:

- 5.1. To treat the welfare and well-being of children as the paramount consideration, and make it the focus of any action taken in any conflict of interest.
- 5.2. To treat child safeguarding and protection as the responsibility of the whole College. Any member of staff who has knowledge or suspicion that a child is being harmed or is in need must inform the **Designated Safeguarding Lead (DSL) Shebul Ali** and any other nominated person(s) with responsibility for ensuring these procedures are implemented.
- 5.3. To guide staff, teachers, parents, adult assistants and all other employees/sub-contractors so they do not put themselves in positions where they could be accused of any form of abuse.
- 5.4. To instruct any parent, adult assistant or employee who sees or hears anything which could be perceived as either poor practice or abuse in relation to the care of children, that they must report the incident to the **Designated Safeguarding Lead (DSL) Shebul Ali** and/or his deputies.
- 5.5. To ensure that all staff and other stakeholders have a DBS check if they are participating in UKG activities that will bring them into contact with U18s.
- 5.6. To ensure the College has the correct policy and procedures in place and that all staff and those who come in contact with Under 18s have access to the policy and procedures on the College website, read and understand the procedures, and sign the declaration to state that they understand the procedures.
- 5.7. To enable staff working with children to meet these commitments, the College will provide and/or require staff to complete appropriate training in child safeguarding and protection, in line with British Council guidelines and Tower Hamlets Council guidance. Refresher training and certification on child safeguarding and protection will be required every two years. UKG will keep a record all safeguarding CPD staff training and certification.
- 5.8. To review this policy annually, place it on the College website and ensure all staff sign the declaration stating that they have read and understood it.
- 5.9. For all staff to receive guidance and instructions on College safeguarding procedures during their induction and will be required to read Part 1 and/or Annex A of Keeping Children Safe in Education (2021). Staff will receive regular safeguarding updates with reminders about these procedures and contemporary safeguarding issues.

- 5.10. To carry out pre-employment checks on all staff as stipulated by statutory guidance on Keeping Children Safe in Education updated on 1 Sep 2023. For more details see the Safe recruitment procedures below and the UKG Safer Recruitment Policy
- 5.11. To maintain full written records of any child protection or adult safeguarding matter dealt with under these procedures on the electronic safeguarding system as stipulated by statutory guidance on Keeping Children Safe in Education updated on 1 Sep 2023.
- 5.12. To work actively in partnership with Tower Hamlets Council on all matters relating to child safeguarding and protection.

6. Key Contacts

- 6.1. The college is a 'relevant agency' as identified in local safeguarding arrangements by Tower Hamlets Council. The college works with the 3 partners (health, social care and police) to contribute to the safety of Tower Hamlet's children.
- 6.2. The **Designated Safeguarding Lead, Ali Shebul** is responsible for Child Safeguarding at the College or anywhere outside the College when children are staying in accommodation arranged by the UKG or on excursions with UKG staff.
- 6.3. Where emergency medical help is needed DO NOT DELAY – contact a first aider in college or alternatively arrange for the person to be taken to hospital.
- 6.4. If you have concerns about the safety or welfare of a child or want to make a referral, call 0300 303 6070. Through this number you can be triaged by Tower Hamlets Council's Customer Service Centre to the Initial Contact Team if a referral is appropriate or to another service.
- 6.5. You can also report concerns over the safety of a child at <http://www.nspcc.org.uk/what-you-can-do/report-abuse/>
- 6.6. If you want to enquire about services for a child or young person call the Family Information Service on 020 7790 1765.



- 6.7. In the unlikely case that it is not possible to contact a member of Staff regarding a concern, Tower Hamlet's Multi Agency Safeguarding Hub (MASH) can be contacted at https://www.towerhamlets.gov.uk/ignl/health_social_care/children_and_family_care/Multi-Agency-Safeguarding-Hub-MASH.aspx
- MASH may be called on Tel: 020 7364 5006 option 3
Extensions: 5606/5601/5358/7796 Email: Mash@towerhamlets.gov.uk
- 6.8. If a child is in immediate danger, please call the police on 999.
- 6.9. Emergency Duty Team (EDT) – Out of hours service
Tel: 020 7364 4079 (after 5pm and at weekends).
- 6.10. You may write to the following address:
Tower Hamlets Multi-Agency Safeguarding Hub
Tower Hamlets Town Hall
160 Whitechapel Road
London
E1 1BJ
- 6.11. Anonymous reporting of Child Abuse to Police Tel: 020 7421 0307
- 6.12. NSPCC Child protection Helpline 24/7 0808 800 5000 or text on 88858
- 6.13. Other Childline helpline: 0800 1111
- 6.14. Whilst the College is not currently a British Council accredited centre, we only refer or place children in accommodation that has been approved by the British Council, and give due consideration to British Council guidelines and accreditation requirements for safeguarding under 18s
<https://www.britishcouncil.org/education/accreditation/information-centres/care-children>
- 6.15. It would NOT normally be necessary for any referral to be made to the police in the first instance. However, as with emergency health issues, **where emergency police assistance is required, DO NOT DELAY.**
- 6.16. In the event of an allegation being made against a member of staff contact the Safeguarding Officer on (+44) 0203 609 0260 or one of the other Safeguarding Officers

7. DBS checks

- 7.1. All staff including volunteers and group leaders coming from outside the UK, who have unsupervised access to children and young people, must be subject to a Full Enhanced DBS check, and the College must hold a copy of every DBS or equivalent check document for all relevant staff and volunteers.

8. Safe recruitment procedures

- 8.1. The College will ensure that all staff and volunteers recruited to work with children will be subject to the following procedures:
- Paid and unpaid staff must complete written application forms which include a section about past convictions, cautions, reprimands and final warnings including any pending cases and a section about any previous complaints of abuse against them
 - All candidates short-listed must be interviewed by a panel of at least two
 - There must be a full investigation of every applicant's employment history and any gaps in their cv must be questioned and fully explained
 - Applicants must provide references from two referees that specify there is no reason why the applicant should not be engaged in situations where they will have responsibility for, or substantial access to, persons under 18
 - Applicants must provide proof of ID and address.

9. Sexual Offences Act 2003

- 9.1. Staff should be aware that according to the Sexual Offences Act 2003, any person in a Position of Trust, who engages in sexual activity of any sort with students under the age of 18 is breaking the law (even though the legal age of consent is 16). It is illegal, therefore, for any UKG staff member who is over 18, to engage in sexual activity with U18 students participating in any activities organised by the College.

10. Staff responsible for safeguarding

- 10.1. Overall responsibility for child protection matters is held by the **Designated Safeguarding Lead, Shebul Ali** (Managing Director) who is the 'designated senior person' for child safeguarding matters at UK Graduate. The DSL also acts as the Senior Mental Health Lead for the organization.
- 10.2. This role entails the following responsibilities:
- Reviewing the Child Safeguarding and Protection Policy and Procedures annually and that they are being fully implemented
 - Ensuring that the Child Safeguarding and Protection Policy is available publicly and that parents are aware of the responsibilities of the College
 - Overseeing the referral of cases of suspected abuse or allegations to social care services
 - Supporting staff who make referrals to social care services



- Undertaking DSL and Advance Safeguarding Training (Level 3) and Prevent Awareness Training every two years
- Referring cases to the Channel programme where there is a radicalisation concern
- Supporting staff in making referrals to the Channel programme
- Working with others in college and LADO on cases where Child Protection concerns involve a staff member.
- Referring to the DBS when a person leaves the employment of the College or is dismissed due to risk/harm to a child.
- Informing the police in cases where a crime may have been committed
- Providing advice and support to other staff on issues relating to child protection
- Informing the Executive Committee of safeguarding developments and giving an overview of policy and cases.
- Maintaining detailed, accurate, secure written records of concerns and referrals (even where that concern does not lead to a referral). This includes details of any follow up and resolution.
- Liaising with, and acting as a point of contact for, the local authority and other appropriate agencies in line with Working Together (2018).
- Understanding the nature of strategy meetings, core groups, case conferences and other inter-agency meetings and taking part in these meetings as appropriate.
- Liaising with any schools who send U18s to the College to ensure that appropriate arrangements are made for the students, including the transfer of any child protection file
- Ensuring the transfer of the child protection file of a student, with such records, who leaves College to join another educational provider (within 5 days of their start date at the new provider).
- Ensuring they have up to date knowledge by attending additional training, workshops or meeting
- Ensuring that staff receive Basic Safeguarding Training (Level 1) and are aware of the College's child safeguarding and protection policy and procedures.
- Keeping the UKG Executive Committee updated on child protection issues in Tower Hamlets Council (particularly Section 47 on police investigations).
- Understanding processes for early help and associated assessments.
- Being alert to the specific needs of children with SEN, children in need, young carers, children in care and care leavers.
- Ensuring that there are appropriate procedures and guidance to assist staff in identifying students vulnerable to radicalisation and following statutory guidance in this area (The Prevent Duty)
- Acting as the Senior Mental Health Lead where safeguarding concerns are linked to mental health
- Promoting supportive engagement with parents and/or carers in safeguarding and promoting the welfare of children.

- Taking lead responsibility for promoting the educational outcomes for children in need. Specifically, this involves being aware of who the cohort of students with a social worker are, monitoring their progress and supporting staff in the College so that these students can reach their potential. This includes ensuring that staff working with the student are informed of this status as appropriate.
- Ensuring that the College has appropriate mechanisms for the identification and referral of cases of child sexual exploitation, child criminal exploitation, female genital mutilation, self-harm, suicide and neglect.
- Ensuring that safeguarding issues and education are promoted through awareness raising.
- Ensuring that the College meets the requirements of Tower Hamlets Council with regard to auditing of child safeguarding and protection practice.
- Encouraging a culture, among all staff, of listening to children/ adults with care and support needs and taking account of their wishes and feelings in any measures the college may put in place to protect them.
- Understanding the importance of information sharing within college and to outside partners as well as relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the General Data Protection Regulation
- Understanding the risks associated with online safety and having the relevant knowledge and capability to keep children safe when online in college
- Recognising additional risks that SEND students face online (around bullying, grooming and radicalisation) and having the capability to support these children to stay safe online
- The designated senior member of staff will provide an annual report to the governing body of the College setting out how the college has discharged its duties and is responsible for reporting deficiencies in procedure or policy identified by Tower Hamlets Council (or others) to the Executive Committee at the earliest opportunity.
- The DSL must make contact the designated officer at the Tower Hamlets local authority if there is an allegation of abuse against a member of staff.

10.3. The DSL will be supported and deputised by three Safeguarding Officers. All staff and Executive Committee members responsible for safeguarding at UKG are listed in the table below

Staff	Role	Location	Contact
Sal Noble	Quality & Standards Manager & Safeguarding Officer	Whitechapel, London Campus	
Jannathun Ferdous	Teacher for U18s & Safeguarding Officer	Whitechapel, London Campus	(+44) 0203 609 0260 or 07944 443444



Sunny Uddin	Executive Committee Member and Safeguarding Officer London Campus	Whitechapel, London Campus	(+44) 0203 609 0260 or 07852 778866.
Shebul Ali	Managing Director & Designated Safeguarding Lead (DSL)	Whitechapel, London Campus	07956 664680 24/7 Emergency Contact to be called if the above contacts are not available. s.ali@ukgraduate.org.uk
Jamal Miah	Child Safeguarding Executive	Whitechapel, London Campus	N/A

10.4. The role of **Safeguarding Officer** involves:

- Reporting to the DSL
- Deputising for the DSL when required
- Making appropriate referrals
- Being available to provide training, advice and support to other staff on issues relating to child safeguarding and protection.
- Available to listen to U18s studying at the College.
- Dealing with individual cases, including attending case conferences and review meetings as appropriate.
- Complete Advanced Safeguarding Training (Level 2) every two years

10.5. The **Child Safeguarding Executive** is responsible for:

- Ensuring that the College has procedures and policies which are consistent with the Local Safeguarding Community Partnership's procedures.
- Ensuring that the governing body (currently Executive Committee) considers the College policy on child safety and protection annually.
- Ensuring that each year the governing body (currently Executive Committee) 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.
- Overseeing the liaison between relevant agencies and the local authority in connection with allegations against the Senior Managers at the College. This will not involve undertaking any form of investigation but will ensure good communication between the parties and provide information to assist enquiries.
- Complete Advanced Safeguarding Training (Level 2) every two years

10.6. All **Safeguarding Staff** and their contact details must be displayed on notice boards in each UKG campus.

11. Safeguarding at UKG

11.1. The College is based in Whitechapel close to traffic and park land, and children need to be supervised by an appropriate adult if they are walking outside the building. Children are likely to use public transport when travelling to and from the College and they need to be aware of any safety risks from traffic or crime.

12. Letter of Consent

12.1. Before any U18 may be enrolled into a course, their parent or legal guardian must complete provide us with the fully completed UKG **Letter of Consent** available on the UKG website.

13. Accommodation

- 13.1. UKG only uses the following homestay accommodation providers that are approved by the British Council:

www.perfecthomestay.co.uk

www.hfslondon.com

- 13.2. Parents, guardians, group leaders and staff should refer to the following Child Safeguarding Policies in relation these accommodation provider

<https://www.perfecthomestay.co.uk/safeguarding-and-child-protection/>

<https://www.hfslondon.com/safeguarding-child-protection/>

14. Online Safety

- 14.1. There is a specific policy outlining the approach of the College to Online Safety as well as the responsibilities of the individuals and groups that make up the college community. This outlines the whole college approach to Online Safety covering the 4 categories of risk around Content, Contact, Conduct and Commerce as stipulated in KCSIE (2021) as well as the College approach to the sharing of nude/semi-nude image involving children (this can also be found in Appendix D of this policy). The college approach to safeguarding around remote learning can also be found in the Online Safety policy.

15. Definitions of the four forms of abuse

- 15.1. Neglect

This is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. It includes such things as failure to protect a child from physical harm or danger, failing to ensure access to appropriate medical care or treatment, allowing a child to wear inappropriate clothing, providing inappropriate food, providing insufficient attention including unresponsiveness to basic emotional needs, lack of supervision, deficient safety provision, exposure to undue cold, unnecessary risk of injury.

15.2. Physical abuse

This involves physically hurting a child in any way such as hitting, shaking, throwing, poisoning, burning, scalding, drowning, suffocating, giving a child alcohol, giving medication without permission, intensity of training beyond the capacity of the individual. Physical harm may also be caused when a parent/carer feigns the symptoms of, or deliberately causes ill health to a child they are looking after. A person might do this because they enjoy or need the attention they get through having a sick child. Physical abuse, as well as being the result of an act of commission can also be caused through omission or the failure to act to protect.

15.3. Sexual abuse

This involves any aspect of sexual abuse, whether physical or verbal including inappropriate physical contact. Sexual abuse involves forcing or enticing a child or young person to take part in all kinds and degrees of sexual activity whether or not the child is aware of or consents to what is happening. Physical contact includes penetrative and non-penetrative acts such as fondling. Sexual abuse may also include non-contact activities such as involving children in looking at, or the production of pornographic material or watching sexual activities or encouraging children to behave in sexually inappropriate ways. Boys and girls can be sexually abused by males and/or females, by adults and other young people regardless of their background.

15.4. Emotional abuse

This is the persistent emotional ill treatment of a child such as to cause severe persistent adverse effects on the child's emotional development. It may involve making a child feel or believe they are worthless or unloved, inadequate or valued only as a means of meeting the needs of another person and not their own. This type of abuse can often take the form of shouting, threatening or taunting children, constant criticism, bullying or unrealistic pressure to perform.

16. Other Specific Safeguarding Issues

16.1. Mental Health

Mental health problems may be an indication that a child is at risk of or has been a victim of abuse, neglect or exploitation. Staff in college are in a good position to be able to share with the Administration team when a student's behaviour suggests that they may be suffering, or at risk of suffering, a mental health problem. When a student has suffered from trauma or adverse childhood experiences. This can impact on a person's mental health later in life. The college's CPD programme provides opportunities for staff to develop knowledge of indicators of poor mental health and the impact it can have on children's, behaviour and education.

There is often a link between mental health and safeguarding concerns such as self-harm and suicidal thoughts. If a member of staff receives a disclosure of self-harm, suicidal thoughts or other issues that may lead to significant harm they must report to a designated safeguarding lead without delay. The designated lead will oversee that Tower Hamlets Council care pathway is followed, that safety is assured and this will usually involve sharing information with parents/ carers as the person with parental responsibility when the student is under 18 years old. See [social care/ASC/Adult social care.aspx](#) if you would like to refer to Tower Hamlets Council protocol

16.2. Peer on Peer Abuse

All staff should be aware that safeguarding issues can manifest themselves via peer on peer abuse. This can happen in and out of college and online and is most likely to include, but may not be limited to:

- Bullying, including cyberbullying, prejudice based and discriminatory types (follow the Anti-Bullying policy in these cases)
- Relationships abuse in intimate relationships between peers
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (in most cases the Student Conduct Policy will be followed in first instance where victim and perpetrator are both college students – this should not preclude use of safeguarding procedures as deemed appropriate)
- Sexual violence such as rape, assault by penetration or sexual assault (this may include an online element which facilitates, threatens and/or encourages physical abuse)
- Sexual harassment such as sexual comments, remarks, jokes and online sexual harassment
- Up skirting, which typically involves taking a picture under a person's clothing without their position, with the intention of viewing their genitals or buttocks to gain sexual gratification, or cause the victim humiliation, distress or alarm
- Consensual or non-consensual sharing of nude/ semi-nude images or videos

- Also known as youth produced sexual imagery or sexting: and initiation/ hazing type violence and rituals (where a person is abused as a way of initiation into a group)
- All instances of suspected peer on peer abuse must be reported to a Safeguarding Officer. In the case of bullying this reporting is in addition to following the anti-bullying policy. The college promotes a policy of zero tolerance towards peer on peer abuse (including sexual harassment) and takes all disclosures seriously.
- Students are made aware via posters and other updates that they can report concerns to any member of staff or directly via the contact details on posters, in-person to a safeguarding officer, at via reception or by email to the Designated Safeguarding Lead s.ali@ukgraduate.org.uk

16.3. Discriminatory abuse

Includes racist, sexist, homophobic, ageist comments or jokes or comments and jokes based on a person's disability or any other form of harassment, any of the above forms of abuse with discrimination as a motive, not responding to the dietary needs or not providing appropriate spiritual support. Excluding a person from activities on the basis that they are 'not liked' is also discriminatory abuse.

16.4. Domestic Abuse

The first ever statutory definition of Domestic Abuse (DA) was introduced in the Domestic Abuse Act (2021). This legislation also recognised the impact of DA on children, as victims in their own right or through seeing, hearing or experiencing the effects of the abuse. As of September 2021, the statutory guidance to accompany this definition had not yet been issued. This policy will be updated on publication of this guidance. However, the definition is known and we can therefore report as DA the following behaviour where both parties are over 16 and they are 'personally connected'.

- Physical abuse
- Emotional abuse
- Economic abuse
- Coercive and controlling behaviours

16.5. Where the above stipulations (types of behaviours and age) we can count the relationships below as being personally connected and therefore meeting the definition of DA

- Ex-partners
- Family members
- Intimate adult partners
- Teenage relationship abuse (16-17)
- Child to parent abuse

16.6. Female Genital Mutilation

Female Genital Mutilation (FGM) comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long lasting consequences. More detail on this form of abuse can be found in the [FGM Fact Sheet](#). There is a specific statutory reporting duty regarding FGM. Instructions for the reporting of FGM are found in section 6 of this guidance.

16.7. Youth Violence and Gang Involvement

The college has a responsibility to contribute to multi agency work to prevent serious youth violence and gang involvement. All staff should be aware of indicators, which may signal that children are at risk from, or are involved with serious violent crime. These may include increased absence from school, 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. The College will work with the local Youth Offending Service and Tower Hamlets Council to understand the local situation and risks. This will inform the work undertaken to educate and support students to reduce the risks, through measures such as Tutorial sessions on conflict resolution, the laws around knife crime and 'joint enterprise'. The search and confiscation policy will be used as appropriate where intelligence informs us that students may be in possession of items that may be linked to youth violence and gang involvement. Appropriate support and interventions will be put in place where a risk of involvement in gangs or youth violence is identified.

16.8. Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)

Both CSE and CCE are forms of abuse and both occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal activity. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources. In some cases, the abuse will be in exchange for something the victim needs or wants and/or will be to the financial benefit or other advantage (such as increased status) of the perpetrator or facilitator. The abuse can be perpetrated by individuals or groups, males or females, and children or adults. The abuse can be a one-off occurrence or a series of incidents



over time, and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence. Victims can be exploited even when activity appears consensual and it should be noted exploitation as well as being physical can be facilitated and/or take place online. There are links between CCE/ CSE and Trafficking. Where it is thought that a child has been trafficked (including within the UK or even local area) to be criminally or sexually exploited a designated safeguarding lead should make a referral to the National Referral Mechanism for trafficking (NRM) as well as to social care locally.

The exploitation that takes place within the County Lines phenomenon also comes under the banner of CCE. County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one or more importing areas [within the UK], using dedicated mobile phone lines or other form of “deal line”.

Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to move [and store] drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children can be targeted and recruited into county lines in a number of locations including schools, further and higher educational institutions, pupil referral units, special educational needs schools, children’s homes and care homes. Children are often recruited to move drugs and money between locations and are known to be exposed to techniques such as ‘plugging’, where drugs are concealed internally to avoid detection. Children can easily become trapped by this type of exploitation as county lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network. When it is suspected that a child or adult with care and support needs is involved in, or vulnerable to becoming involved in, county lines activity the designated safeguarding lead must be informed and a referral to social care made.

16.9. Preventing Radicalisation

Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism. UK Graduate has a specific Prevent policy, risk assessment and action plan surrounding this area of safeguarding and this should be referred to for guidance.

16.10. Forced Marriage

Forcing a person into a marriage is a crime in England or Wales. A forced marriage is one entered into without the full and free consent of one of the parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of free and full consent can be where a person does not consent (if they have learning difficulties, for example).



17. Children Missing From Education

- 17.1. A child going missing from education is a potential indicator of abuse or neglect. Staff should inform the designated safeguarding lead if they are concerned that patterns of absence may indicate issues such as child sexual exploitation, FGM or neglect.
- 17.2. Where a child has missed 3 consecutive weeks of lessons and/or attendance is below 50% and there is no known explanation contact will be made with parents or carers (those with parental responsibility) and reassurance of the child's safety will be sought. A safeguarding record under the nature 'Missing Education' will be established and a chronology maintained
- 17.3. In the exceptional circumstances where 14-16 years old students are enrolled with the college they must work collaboratively with the Local Authority in order to share information about attendance and absences as deemed appropriate. The College should also inform the Local Authority immediately if that child aged 14-16 is removed from roll so that they can fulfil their duty of identifying students of compulsory age that are missing education.

18. Homelessness

- 18.1. When a member of staff learns that a child's family is at risk of homelessness this should be referred to a designated safeguarding lead who will be able to ensure that the relevant team in the Local Authority is supporting the family. Where a 16 or 17-year old student who no longer lives with parents/ carers is at risk of homelessness this should be reported to a designated safeguarding lead who will be able to make a referral to social care who have a duty to ensure the child is accommodated safely, either with their parents or in alternative accommodation.
- 18.2. Financial abuse/ material abuse
Includes theft, fraud, exploitation, pressure in connection with Wills or property, or the misappropriation of property or benefits. It also includes the withholding of money or the unauthorised or improper use of a person's money or property, usually to the disadvantage of the person to whom it belongs. Staff borrowing money or objects from a service user would also be considered abuse.

19. Children at Greater Risk of Harm

- 19.1. It is recognised that some children are at greater than average risk of harm and so additional mitigations may need to be in place to protect them. As such the college puts in place a personalised risk assessment for all students who are Looked After, Care Leavers or are subject to a Social Work Assessment, Child In Need Plan or Child Protection Plan. In addition, a personalised risk assessment is in place for all students with a current Education, Health and Care Plan (EHCP) around their learning but this may also contain mitigations around safeguarding risk. Students with an EHCP are told that they can access support to report concerns around bullying or safeguarding through their allocated Transition and Review Officer.
- 19.2. **If a disclosure is made that a student (child or vulnerable adult) is a perpetrator or victim of relationship abuse – or if a child is witnessing this type of abuse or its effects at home – this must be reported to a Safeguarding Officer.**

20. Signs of Abuse

- 20.1. Signs of physical child abuse
- burns, bite marks, cuts, bruises, or welts in the shape of an object
 - resistance to going home
 - fear of adults
- 20.2. Some signs of emotional child abuse
- apathy, depression
 - hostility
 - difficulty concentrating
- 20.3. Signs of sexual child abuse
- inappropriate interest in or knowledge of sexual acts
 - seductiveness
 - avoidance of things related to sexuality, or rejection of own genitals or body
 - either overcompliance or excessive aggression
 - fear of a particular person or family member
- 20.4. Signs of neglect of a child
- clothing unsuited to the weather
 - being dirty or unbathed
 - extreme hunger
 - apparent lack of supervision

For further information check the following websites:

www.helpguide.org www.chidline.org.uk www.nspcc.org.uk

21. Guidance for staff

21.1. If you are concerned that a child within the College has suffered maltreatment you should follow these guidelines. It doesn't matter how insignificant the concerns may seem.

21.2. A general principle of 'it could happen here' should be followed.

21.3. What to do if you suspect, or are told, that is being abused.

- You should **NOT** investigate the concerns - this is the job of the relevant authorities.
- Do **NOT** ask questions (which may prejudice any subsequent enquiry) or examine the child for any sign of injury.
- **LISTEN CAREFULLY** to what you are being told and don't pass any kind of judgement on any of the information that you are being given.
- Carefully record **IN WRITING** what the child has told you, or what has been observed, as soon as possible. Sign and date this disclosure and pass on to s.ali@ukgraduate.org.uk **You can also contact any college reception who will support you to contact a designated safeguarding lead.**
- DO NOT PROMISE CONFIDENTIALITY AS THIS CANNOT BE DELIVERED.
- Do **NOT** contact the child/ adult's parents or carers.
- **IMMEDIATELY CONSULT** – Sal Noble at London Campus or Jannathun Ferdous at the London Campus
- If there is any need for emergency medical treatment **DO NOT DELAY** contact a First Aider.
- If you cannot access a designated person do not delay. Any member of staff can make a referral to Children's Social Care (as outlined in Appendix A)
- This procedure also applies if the allegations of abuse are being made against other children.

21.4. The Serious Crime Act (2015) places a statutory duty on teachers to report to the police where they discover (either through disclosure by the victim or visual evidence) that **Female Genital Mutilation (FGM)** appears to have been carried out on a girl under 18. If a disclosure of FGM is made (or evidence seen, though this is unlikely as teachers should not look or investigate if the girl is under 18) at the time of the disclosure:

- The disclosure should be recorded in the usual way
- The disclosures should be shared as soon as possible with the designated safeguarding lead
- The designated safeguarding lead will support the teacher in reporting the disclosure to the police – usually via 101 (This reporting is the teacher's statutory duty and they will face disciplinary sanctions if it is found that a report to the police is not made following a disclosure)

21.5. A report should be made to the designated safeguarding lead in the event that a safeguarding concern involving FGM comes to light where –

- Risk of FGM is identified, but it has not yet been carried out
- The disclosure does not come directly from the alleged victim
- The victim is no longer under 18 (even if they were when the FGM took place)
- The disclosure is made to a member of staff who is not a teacher

21.6. In these cases, the designated safeguarding lead will follow local safeguarding procedures and the staff member will not have to contact the police.

22. Allegations of abuse against staff

22.1. The procedures apply to all staff, whether teaching, administrative, management or support, as well as to volunteers. The word 'staff' is used for ease of description

- You should **NOT** investigate the concerns.
- Do **NOT** ask questions (which may prejudice any subsequent enquiry) or examine the child for any sign of injury.
- **LISTEN CAREFULLY** to what you are being told and don't pass any kind of judgement on any of the information that you are being given.
- Carefully record **IN WRITING** what the child has told you, or what has been observed, as soon as possible. Sign and date this disclosure and pass on to Sal Noble at the London Campus or Jannathun Ferdous at London Campus.
- DO NOT PROMISE CONFIDENTIALITY AS THIS CANNOT BE DELIVERED.
- Do **NOT** contact the child's parents or carers.
- **IMMEDIATELY CONSULT** Sal Noble at the London Campus or Jannathun Ferdous at London Campus.
- If there is any need for emergency medical treatment **DO NOT DELAY**, contact a First Aider.
- If the allegation is made against the designated person, the Principal must be **CONTACTED IMMEDIATELY**.
- If you cannot access a designated person do not delay. Any member of staff can make a referral (as outlined in Appendix A).

22.2. In cases of allegations of abuse being made against a member of staff, the Staff Disciplinary Procedure will be invoked.

22.3. The College Managing Director will work with other safeguarding officers as appropriate to follow the Tower Hamlets Council Safeguarding Community Partnership Guidelines linked below. It is likely that, as part of this process, the Local Authority Designated Officer will be contacted. [https://www.towerhamlets.gov.uk/ignl/health social_care/ASC/Adult_social_care.aspx](https://www.towerhamlets.gov.uk/ignl/health_social_care/ASC/Adult_social_care.aspx)

23. Dealing with Safeguarding Concerns

- 23.1. All staff and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in the College's safeguarding regime and that such concerns will be taken seriously by the senior leadership team.
- Staff can raise concerns by contacting the Managing Director
s.ali@ukgraduate.org.uk
 - Staff can also raise concerns via the Whistleblowing Policy
 - Where a staff member feels unable to raise an issue with the College or feels that their genuine concerns are not being addressed, other whistleblowing channels may be open to them:
 - For general guidance <https://www.gov.uk/whistleblowing>
 - The NSPCC what you can do to report abuse dedicated 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.

24. Effects of abuse

- 24.1. Abuse in all its forms can affect a child of any age. The effects can be so damaging that they may follow an individual into adulthood. A number of studies suggest that children with disabilities are at increased risk of abuse through various factors such as stereotyping, prejudice, discrimination, isolation and powerlessness to protect themselves or adequately communicate that abuse has occurred. Children from ethnic minorities, who may also be experiencing racial discrimination, may be doubly powerless.

25. Responding to the child

- 25.1. If a child says or indicates that he or she is being abused, or information is obtained which gives concern that a child is being abused, the person receiving this information should:
- React calmly so as not to frighten the child
 - Do not interrogate the child. It is not your job to carry out an investigation – this will be up to the police and social services
 - Don't cast doubt on what the child has told you, don't interrupt or change the subject
 - Don't say anything that makes the child feel responsible for the abuse. Tell the child that he or she is not to blame and that it was right to tell
 - Take what the child says extremely seriously, recognising the difficulties inherent in interpreting what is said by a child who has a speech disability and/or differences in language
 - Act at all times towards the child as if you believe what they are saying
 - Keep questions to the absolute minimum to ensure a clear and accurate understanding of what has been said

- Reassure the child but do not make promises of confidentiality which might not be feasible in the light of subsequent developments
- Take further action immediately. Tell your designated child protection person who must follow it up
- Make a full written record of what has been said, heard, and/or seen as soon as possible using the confidential Child Abuse Incident Record Form.

26. Safe environment

- 26.1. It is the policy of the College to comply with the terms of the Health and Safety at Work act 1974 and subsequent legislation to provide and maintain safe and healthy working conditions, equipment and systems of work for all our employees and volunteers, and to provide such information, training and supervision as they need for this purpose.
- 26.2. The College also recognises and accepts its responsibility to protect the health and safety of all visitors to the workplace (including contractors, temporary staff, visiting teachers, students, children and other centre users and any members of the public) who might be affected by our activities. The College will also cooperate on health and safety matters with other organisations accommodated within our premises a.
- 26.3. The College will also ensure suitably robust Health and Safety procedures are in place in any other locations where we may run activities for children and/or adults.
- 26.4. A copy of this policy will be issued to each member of staff and volunteer. The policy will be kept up to date and the way in which it has operated will be reviewed each year. Please refer to the Health and Safety Policy for further details.
- 26.5. The Designated Safeguarding Lead or his/her deputy will be responsible for the following:
- Liaising with the Executive Committee regarding all health and safety issues relating to children involved in activities run by the College.
 - Carrying out risk assessments prior to any away days or trips
 - Ensuring adequate monitoring of the safety and suitability of all materials and equipment has been carried out prior to use by children including the study/play area(s), play equipment, transport arrangements and vehicles
 - Adequate First Aid provision is available on site with a qualified First Aider that has immediate access to a phone with emergency contact phone numbers.

27. Code of Behaviour towards Children

27.1. The following notes are provided to give general guidance to avoid the possibility of claims of abuse against parents, adult assistants or employees/sub-contractors. If parents, adult assistants or employees/sub-contractors have any uncertainty over whether they are using good practice they should seek guidance from his or her supervisor or senior manager. Avoid doing anything which is not totally open and make sure that all children are treated the same way.

- Avoid any favouritism
- Avoid being overly tactile
- Avoid fitting clothing or equipment; try to get the children to put things on for themselves
- If it is necessary to assist a child to put on clothing or equipment, get him or her to agree that you will fit it and explain what you are doing while you are assisting him/her
- If you have to assist a child to put on clothing or equipment, make sure you do so openly and in sight of other participants
- Avoid making any contact with the child's genitalia and, in the case of a girl, her chest
- If you are required to lift, carry or support a child, for instance, lifting a child into a chair after a fall, avoid contacting sensitive parts of the body, explain what you are doing while you are doing it and, where practicable, gain their consent
- Do not put yourself in a position where you find yourself alone with a child out of public view
- Do not make any sexually suggestive comment to any child
- Do not engage in rough physical or provocative games or horseplay with any child
- If you are working with groups where physical contact is inevitable, such as disabled or younger children (under 12 years old), it is essential that carers' or parents' consent to the methods of lifting, carrying or other contact which will take place
- Never leave a child or a group of children unsupervised

27.2. Males should not enter **female toilets** or changing rooms unless there is an emergency. Females should not enter male toilets or changing rooms unless there is an emergency.

27.3. If any child makes approaches to you or is overly familiar, you should extract yourself from the situation and report the matter to your supervisor or senior manager as soon as possible.

27.4. The College has a clear responsibility for supervising children when undertaking any programme or activity on the premises or outside. The person responsible for supervising children at any given time must:

- Keep a check on visitors and guests using a visitors book to record whether their visit is by invitation or unsolicited to ensure the welfare of children is safeguarded at all times

- Ensure there is a minimum of two members of suitably appointed staff in attendance at all times children are present and unaccompanied by a parent/carer and a minimum ratio of 2 adults to every 20 children
- Ensure Health & Safety procedures are adhered to and equipment checked on a regular basis
- Ensure parents/carers complete the written consent form before children or young people can be taken off site.
- Ensure that all children understand how to remain safe in the UK when using the internet (see the Prevent Policy) and avoiding crime e.g., use of illegal substances.

27.5. For all classes/events the following table identifies who is responsible and when. The table is applicable to most other College activities and the Activity Organiser is responsible for examining the table for applicability, and drawing up and publishing a similar table if necessary.

Table 1

<ul style="list-style-type: none"> Activity 	Responsibility
From stated start of teaching, activities or events until declared completion of training activities or events for the day.	Teacher, leisure activities supervisor, group leader or child-carer, recruited by the College.
Child unable to participate in activities through being unwell.	Teacher, leisure activities supervisor, or assistant until specifically relieved of this obligation by the child's own parent/guardian or nominated guardian.
From declared completion of teaching, activities or events for the day until stated start of subsequent day's activities.	Parent or guardian or group leader nominated by the child's own parent/guardian.

- 27.6. If an unaccompanied child is unwell while participating in a class, activity or event, the College is responsible for the child's care. If more than a minor nature, that is, needing to see a doctor or be taken to hospital, the child's own parents (or guardians) must be contacted to inform them of the situation. No young person under the age of 18 can be left unattended with either a doctor or at a hospital. A child who is unable to participate in activities through being unwell must be supervised. Senior management must be informed of the situation.
- 27.7. You have a responsibility to report any concern you may have that a child attending a class, activity or event is being subjected to any form of abuse or poor practice. If you have a concern, you must take the action identified in the Child Protection procedures management flow chart

Risk Assessments

- 27.8. The DSL is responsible for ensuring that the UKG Risk Assessment form has been completed for all times that children are travelling to and from their accommodation and whenever children are required to travel on excursions.
- 27.9. Risk assessments are also required whenever the College organises activities in its premises and invites external organisations or individuals to participate. All external bodies and individuals must be vetted before being invited to participate in activities organised for children. Key people who come into contact with children must have Prevent and Basic Safeguarding Training (Level1).

28. Whistle blowing protocols

- 28.1. All staff and volunteers have a duty to report concerns about a member of staff or volunteer. It is important that any concerns for the welfare of a child arising from suspected abuse or harassment by a member of staff or volunteer must be reported to either the designated safeguarding lead or his/her deputy immediately (see contact details below). Anyone reporting concerns in good faith about a colleague abusing a child will receive the College's full support. Whistle-blowers will be regarded as witnesses and not complainants so that it is possible to separate the message from the messenger.
- 28.2. All allegations of abuse against a member of staff or volunteer must be fully recorded and reported using the Child Abuse Incident Record Form. The designated safeguarding lead will make every effort to maintain confidentiality for all concerned and consideration will be given to the support that may be appropriate to children, parents/carers, staff members and volunteers.
- 28.3. If are unsure about how to proceed with a whistle blowing situation, staff should seek immediate advice from Social Services of the NSPCC (see contact details below).

29. Appendix 1 Guidance on dealing with a disclosure

29.1. You must refer – You must NOT investigate – Do NOT delay

29.2. The aim of the person dealing with a disclosure should be to establish as quickly as possible the nature of the injury or alleged abuse to facilitate an effective referral if necessary. See the key contacts above refer to **Social Services** if in doubt without undue delay on **0345 678 9021**

29.3. The designated person should have as much accurate information as possible available and have thought through the concerns to be expressed including:

- Names and dates of birth of the child/ vulnerable adult and family members, including all other children.
- Ethnicity
- Home address
- Names of those who hold parental responsibility
- Whether the child and parents/carers are aware of the referral
- Whether the concern is something that has been observed by the referrer or another member of staff or a third party.
- Whether the concern is related to the child's behaviour, an injury or something that the child or vulnerable adult has said.
- Whether the child or vulnerable adult has told anyone else.
- Whether the concern has developed gradually or just today
- What evidence there is for the concern
- What is the **context** of the concern. Regard should be given to contextual safeguarding (i.e.) whether wider threats or factors may be having an impact on welfare. For example, the local community, potential gang links, online influences.
- Who you think is responsible for the harm or potential harm to the child or vulnerable adult.
- Whether you think that the child needs immediate protection.
- Lack of availability of this information is not a reason to delay the referral to Social Services

- 29.4. The designated person should establish clarity with Social Services regarding the next course of action to be taken and by whom, and fully record the discussion and actions agreed.
- 29.5. The designated person should take no action without the agreement of Social Services
- 29.6. Where emergency medical help is required DO NOT DELAY – contact a First Aider.
- 29.7. The designated person will ensure that updates are forthcoming from the authorities with regard to progress against reported cases, within the relevant timescales and follow up the concern/ escalate if the promised information or decision does not arrive in the timescale promised.
- 29.8. If, after a referral, the child's situation does not appear to be improving, the referrer should consider following the escalation procedures outlined in Appendix C to ensure that concerns have been addressed and that the child's situation improves.



30. Appendix 2: UKG Child Abuse Incident Record Form

Attach all relevant information to this form.

1. Date of incident:.....Time of incident:.....
2. Person completing this form:.....
3. Position of person completing this form:.....
4. Details of the person reporting the incident:

Name.....

Address.....

.....

5. Details of the child involved in the incident

Name.....

Address.....

.....

DOB.....

6. Details of the parent/carer(s)

Name.....

Address.....

.....

7. Details of the person reported for poor practice or potential abuse:

Name.....

Address.....

.....



UK GRADUATE

power through education

8. Notes of Incident and what was said or done by whom (*do not lead the child – record actual details*. Continue on a separate sheet if necessary):



9. Action taken so far:

e.g. Have you contacted the LSCB (Local Safeguarding Children Board)

10. Is this a case of poor practice or potential abuse?

11. Poor practice – state action taken:

12. Is it potential abuse?

13. Contact designated child protection officer or Head of Centre immediately.

14. Brief notes of this discussion:

15. If agreed follow external investigation procedure.

16. Suspend employee in writing, pending investigation.

Date of suspension:

Time of suspension:

Attach copy of letter

17. Inform Social Services, who will carry out an investigation or involve police.

Date:

Time of call:

Contact officer:

Telephone number:

18. Action taken as a result of external investigation:



31. Appendix 4 sharing nudes and semi-nudes

31.1. This guidance is based on the document Sharing nudes and semi-nudes [Advice for education settings working with children and young people. Responding to incidents and safeguarding children and young people produced by UKCCIS (2020)].

31.2. This guidance covers incidents where:

- A person under the age of 18 creates and shares nudes or semi-nudes of themselves with a peer under the age of 18
- A person under the age of 18 shares nudes or semi-nudes created by another person under the age of 18 with a peer under the age of 18
- A person under the age of 18 is in possession of nudes or semi-nudes created by another person under the age of 18

31.3. It does not cover the sharing of nudes or semi nudes of people under 18 by adults (this is sexual abuse and so covered in an earlier section) or the sharing by people under 18 of pornography or exchanging sexual texts with no imagery.

31.4. It is illegal to make, possess or distribute 'indecent' images of an under 18-year-old (child) and this includes imagery of yourself if you are under 18.

31.5. The UKCCIS guidance (2020) states that 'indecent' is not defined in legislation. Where there is a prosecution it is decided upon on a case by case basis by the courts. It does not always include nudity and cases are likely to be defined as indecent if they meet one or more of the following criteria:

- Nude or semi-nude sexual posing (e.g.) displaying genitals and/ or breasts or overtly sexual images of young people in their underwear
- Someone nude or semi-nude touching themselves in a sexual way
- Any sexual activity involving a child
- Someone hurting someone else sexually
- Sexual activity that involves animals

31.6. The images can be still photographs, videos or live streams that can be posted on any online medium or offline through media such as air drop or SMS messaging. They can be public, 1:1 or group chats and can take place in closed social media groups.

31.7. The making, possessing and distribution of the images are all illegal.

31.8. The police, though, are keen not to unnecessarily criminalise young people due to the stigma and impact of this on them. The **police response** takes this factor into account.



31.9. Where there is evidence that an incident is 'experimental' and there is no evidence of abusive or aggravating elements then the college can deal with the incident in house without the involvement of the police. Such incidents are to be treated primarily as matters relating to safeguarding rather than crimes.

31.10. When the police are notified of nudes or semi-nudes being shared in the ways outlined above they are obliged to record it on their crime systems. The incident is listed as a crime and the young person involved may be listed in relation to it. This is not the same as having a criminal record.

31.11. If it is decided that there are abusive and/or aggravating factors, the child or young person may receive a caution or conviction.

31.12. If it is decided that the incident is non-abusive and has no evidence of exploitation, grooming, profit motive, malicious intent or persistent behaviour an outcome 21 can be recorded (the young person broke the law, there is evidence to support this but further investigation is not in the public interest). The young person has a statement on their file but no criminal record. Their parents/ carers and educational setting are informed.

31.13. This type of incident should be treated by staff in the same way as any other safeguarding incident listed in the main body of these procedures. This means that in incidents of sharing of nudes or semi-nudes:

- A referral must be made to a designated safeguarding lead as soon as possible
- The designated lead should meet with appropriate staff to review the case as soon as possible and this meeting should consider the wider context of the incident (see below)
- If appropriate there should be an interview with the young people involved
- Parents should be involved at an early stage (unless this is not appropriate under the safeguarding procedures – e.g. it puts the young person at others at heightened risk)
- If there is a concern of harm or danger of harm to the young person/ people involved a Child Protection referral should be made
- It may be necessary to instigate a risk assessment immediately

31.14. Do's and Don'ts for all college staff

- This link provides a one-page guide on how to deal with an incident of this type as any member of college staff <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>

31.15. Key advice includes:

- Never view, copy, print, share, store or save the imagery yourself, or ask a child to share or download – this is illegal.
- If you have already viewed the imagery by accident (e.g. if a young person has showed it to you before you could ask them not to), report this to the DSL (or equivalent) and seek support.
- Do not delete the imagery or ask the young person to delete it.
- Do not ask the child/children or young person(s) who are involved in the incident to disclose information regarding the imagery. This is the responsibility of the DSL (or equivalent).
- Do not share information about the incident with other members of staff, the young person(s) it involves or their, or other, parents and/or carers.
- Do not say or do anything to blame or shame any young people involved.
- Do explain to them that you need to report it and reassure them that they will receive support and help from the DSL (or equivalent).

31.16. Designated Safeguarding Leads should carry out an Initial Review Meeting and Administration Team Review. This meeting should consider the evidence and establish:

- Whether a young person is at immediate risk of harm/ whether a child protection referral needs to be made immediately
- Whether it is necessary to view the imagery to safeguard the young person involved
- Any further information that is needed
- How widely the image has been shared
- Whether images need to be immediately deleted from devices or online
- Any relevant background on the young people involved
- Whether to contact parents at this stage
- Whether another educational setting needs to be contacted

31.17. At this stage a decision should be made as to whether a referral to Social Care/the police needs to be made or the incident can be dealt with 'in house'. This decision will largely be informed by a judgement as to whether the incident was aggravated or experimental

- Aggravated incidents include abusive or additional elements beyond the creation and/or sending of the image. There may be an adult involved who is instigating a grooming process or similar, an attempt to harm (revenge, fights among friends, blackmail, threats, deception etc). There may also be reckless misuse, where images are taken or

sent without permission of the subject and this recklessness may need to harm for the young person.

- Experimental incidents occur with no adult involvement and with no intent to harm or recklessness. So, this could include consensual 'romantic' sharing of images, sexual attention seeking where a person innocently shares an image perhaps with a potential partner, the child taking a picture just for their own use.

31.18. This information may be used alongside any other contextual factors [such as an assessment around Harmful Sexual Behaviours (HSB)] when deciding to refer or follow up 'in house'. **Typically, experimental incidents will be more likely to be followed up in house and aggravated will always require referral to Social Care and the police.**

31.19. Early referral to police and/ or child protection services The incident MUST be immediately referred if :

- The incident involves an adult
- There is evidence of aggravation (see above)
- There is concern around grooming or coercion (or it is felt that, due to issues such as an additional need, the young person does not have the capacity to consent)
- The imagery contains elements of violence or unusual sexual activity for their developmental stage (Harmful Sexual Behaviour Tools can be referred to here)
- The imagery involves a young person under 13
- The young person is at immediate risk of harm (e.g., suicidal or self-harming) as a consequence of the imagery being shared

31.20. This decision must be made by a DSL and should be documented on the student(s) safeguarding record in college. This record should include a formal risk assessment.

31.21. If none of the criteria in section 2 apply and the incident can be classified as experimental (see above) then it is possible to respond to the incident in house (though it may still be escalated at any time)

31.22. This decision should be made if a designated safeguarding lead is confident that the incident can be assessed and managed, in terms of risk, within the college and using existing internal frameworks and support. If the decision is made to respond to the incident internally a further review should take place to establish the facts and assess the risks.

31.23. The following should be considered:

- Why was the image shared (was there any coercion or pressure to share?)
- Who shared the imagery, where and did the subject have awareness of the sharing?
- Were any adults involved in sharing?
- What impact is it having on the subject?
- Is there any history of this kind of activity?

- 31.24. This decision must be made by the Senior DSL and supported by either the Principal or Curriculum Support Director and they must be confident that they have enough information to assess risk and that this risk can be managed with the support available without a referral being made. This should be documented on the student(s) safeguarding record in college. This record should include a formal risk assessment.
- 31.25. Parents/ carers should be informed at an early stage unless informing the parent increases risk (if this is the case it is likely that we would involve other agencies). We may work with the young person for them to inform their parent/ carer.
- 31.26. If it becomes necessary to report an incident to the Police by dialling 101, we must record any crime reference number given as part of the student safeguarding record
- 31.27. If a device needs to be seized and passed to the police because it contains shared imagery it should be confiscated and kept under lock and key until the police are able to collect it.
- 31.28. Staff should **not** view nudes or semi-nudes unless there is a clear reason to do so. The images should not be viewed if it will cause significant distress or harm to the young person. If the decision is made to view the imagery, the DSL would need to be satisfied that viewing:
- Is the only way to decide about whether to involve other agencies
 - Is necessary in order to report the image in order to have it taken down or to support the young person in making a report
 - Is unavoidable as the image has been presented directly by a student or has been found on a college network or device.
- 31.29. If it has been necessary to view an image the member of staff should:
- Never copy, print or share the image (This is illegal)
 - Discuss the decision with the College Director
 - Ensure viewing takes place by a member of the Administration team under the delegated authority of the College Director
 - Ensure that the viewing takes place with another member of staff (preferably a member of the Senior Leadership Team) in the room
 - Ensure that the viewing takes place on the college premises (where possible in the office of a member of the Senior Leadership Team)
 - Ensure that the images are viewed by a staff member of the same sex as the subject (where possible)
 - Record the viewing in the chronology of the subject on the college safeguarding system (recording who was present, why the image was viewed and any subsequent actions)
 - If the device needs to be taken and passed to the police the device should be confiscated and the police should be called. WIFI and data should be disabled to avoid remote deletion of images. The device should then be locked in a secure place until it can be collected by the police.

- 31.30. If the college has decided that other agencies do not need to be involved, the Senior DSL should consider deleting the image from devices and/or online services to prevent any further sharing. This decision should be made with the support of Executive Committee. In most cases this means that the child should be asked to delete the images and given a deadline to do so and confirm that they have carried out the deletion.
- 31.31. The college has the right under the Education Act 2011 to search students for devices, search the devices and to delete any youth produced sexual imagery **if the member of staff is authorised by an Executive Committee member (parental consent is not required)**.
- 31.32. If concerning data is found during a search a member of the Administration team may decide to delete the image or retain the device to report to the police or to be used in a College Conduct case.
- 31.33. This searching of devices (and possible deleting of imagery) should only be done if there is a good reason to do so.
- 31.34. Students should be reminded of the illegality of the act of such images. They should be told that if they refuse to, or it is later found that they did not, delete the image the police may be informed.
- 31.35. All decisions and actions need to be fully recorded (times, dates and reasons for decisions) on the college safeguarding system under the record of the student(s) involved. **When searching a student for potential devices the Search and Confiscation policy should be followed.**
- 31.36. Once established that a young person involved in nudes/ semi-nudes is not at risk they should be **interviewed in College**. Ideally, this should be carried out by a member of the Executive Committee with Safeguarding training such as the DSL, though we will try and facilitate an interview with a different member of staff if this is the preference of the young person.
- 31.37. This conversation is designed to find out what the image involves (and if anyone else is involved) and to find out who has seen the image and how further distribution can be prevented.
- 31.38. In the conversation the young person should be supported and reassured but informed and educated on the risks associated with sharing nudes/ semi-nudes and the illegality of such acts. They should, where appropriate, be signposted to IWF and Childline's removal tools. They may also be supported to contact individual websites to ask for images to be deleted.



31.39. There is specific guidance on how to deal with parents and children in different contexts between page 23 and 26 of the UKCIS (2020) guidance

<https://www.gov.uk/government/publications/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people>

31.40. All incidents must be **recorded** on the College safeguarding system. They should show the details of the disclosure, how the situation has been managed, evidence of sound decision making and referrals (where appropriate) and the next steps (including any inter-agency working) that have brought the incident to a satisfactory conclusion.

31.41. Where an incident is not reported to the police or child protection agencies the reason for this should be part of the record and the agreement of an SLT member recorded.

31.42. The College covers specific elements of this topic during induction including:

- What it is
- How it is most likely to be encountered
- The consequences of requesting, forwarding or providing such images (including consensually)
- Matters of the law
- The risk of damage to feelings and reputation
- Strategies to manage pressure to share such images
- Strategies to manage the receipt of such images

31.43. The college will also provide relevant signposting to other sources of information and advice.

31.44. The college also promotes the use of the National Online Safety app and educational materials that refer to sharing of nudes and semi-nudes.

32. Appendix 5 Sexual harassment and sexual violence

- 32.1. This appendix refers to the detailed advice issued to schools and colleges in September 2021 in Keeping Children Safe in Education and specific guidance in Sexual violence and sexual harassment between children in schools and colleges which is designed to help manage reports of child on child sexual violence and harassment. The guidance is available online via the link <https://www.gov.uk/government/publications/sexual-violence-and-sexual-harassment-between-children-in-schools-and-colleges>
- 32.2. This area relates to incidents when the alleged victim and perpetrator are under 18 (if the perpetrator is over 18 the incident represents sexual abuse rather than a child on child incident). The perpetrator may be an individual or a group of children. The incidents can occur online or face to face and can take place in or out of college. Incidents can involve heterosexual, lesbian, gay, bi or trans (LGBT) children. **Irrespective of these factors any disclosure of sexual violence and/ or harassment must be followed up using this process.**
- 32.3. The college adopts an attitude of ‘**it could happen here**’ to ensure a vigilant approach in this important area. We seek to record all incidents of this type on our college safeguarding record system so that we can recognise the scale of the issue and create a culture where inappropriate behaviour is always challenged. We also seek to educate our students as part of a whole college approach that contributes to challenging sexism in terms of stereotypes and language that reflect wider societal factors. We do this through our Tutorial programme and where possible in curriculum delivery.
- 32.4. The aim here is to offer general guidelines to staff on an approach to these issues. Designated Safeguarding Leads will follow more detailed guidance when investigating incidents.
- 32.5. Staff should be aware of the importance of:
- Making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up;
 - Not tolerating or dismissing sexual violence or sexual harassment as “banter”, “part of growing up”, “just having a laugh” or “boys being boys”; and
 - Challenging behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them recognising that children with SEND are more likely to be abused than their peers and so maintaining an especially vigilant approach to these children
- 32.6. Addressing inappropriate behaviour (even if it appears to be relatively innocuous) can be an important intervention that helps prevent problematic, abusive and/ or violent behaviour in the future.

32.7. It is important that school and college staff are aware of **sexual violence** and the fact children can, and sometimes do, abuse their peers in this way. When referring to sexual violence we are referring to sexual offences under the Sexual Offences Act 2003 105 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: A person (A) commits an offence if: s/he intentionally penetrates the vagina or anus of another person (B) with a part of her/his body or anything else, the penetration is sexual, B does not consent to the penetration and A does not reasonably believe that B consents.
- Sexual Assault: A person (A) commits an offence of sexual assault if: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents. **We need to recognise that this can include a single act of kissing or touching someone sexually without consent.**
- Causing someone to engage in sexual activity without consent: A person (A) commits an offence if: s/he intentionally causes another person (B) to engage in an activity, the activity is sexual, B does not consent to the activity, and A does not reasonably believe that B consents (This could include forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.)

32.8. 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.

32.9. 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.

32.10. When referring to sexual harassment we mean 'unwanted conduct of a sexual nature' that can occur online and offline, in or out of college. When we reference sexual harassment, we do so in the context of child on child sexual harassment.

32.11. 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.

32.12. Sexual harassment can include:

- ‘Up skirting’. This typically involves taking a picture under a person’s clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is now a criminal offence
- 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.
- It may include:
 - non-consensual sharing of sexual images and videos;
 - sexualised online bullying;
 - unwanted sexual comments and messages, including, on social media; and
 - sexual exploitation; coercion and threats

32.13. 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.

32.14. Children may find it difficult to talk directly about sexual violence or harassment and as such we should be aware that information overheard in conversation, from friends or that is discerned from changes in behaviour or demeanour may also lead to a record being made and reported to a designated safeguarding lead.

32.15. It is important for the member of staff receiving the disclosure to :

- Treat incidents that occur out of college or online as seriously as those that occur on campus
- Not promise confidentiality (as this information will need to be shared with a designated safeguarding lead who may need to involve other agencies)
- Listen carefully and non-judgementally to the child and offer them reassurance without asking leading questions
- Make a record of the disclosure. It would be best practice to summarise after the disclosure has been made but it is acceptable to make notes during the discussion and check understanding as the discussion ends. **It is essential that a written record is made and that its accuracy is checked with the person making the report**
- Ensure, where there is an online element that the guidance in Appendix D is followed (in particular to not view or forward illegal images of a child)
- If at all possible have 2 members of staff present when the disclosure is being made (This is not compulsory as it will not always be possible due to the wishes of the young person or availability of staff).
- Inform a designated safeguarding lead **immediately** of the report and to pass the information securely to them
- The Student Conduct Policy will be applied as appropriate

33. Appendix 6 Staff Declaration

I declare that I have read and understood the Child Protection & Safeguarding Policy.

Name of Staff or Stakeholder Member:

Job or Role:

Date