

# LINK19 COLLEGE



## Safeguarding Children and Vulnerable Adults Policy

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Review:

Autumn

2022

# Safeguarding Children and Vulnerable Adults Policy

## Key contact personnel in LINK19 College

### **Designated Safeguarding Adult Lead:**

Miss Denise Moore – Head of LINK19 College

### **Deputy Designated Safeguarding Adult Lead:**

Mr Martin Francis – LINK19 College Assistant Lead

### **Named Safeguarding Director of LINK19 College Ltd:**

Miss Maddy Jones

## **Key contact personnel and Designated Safeguarding Leads of partner organisations**

### Ifield School Lead Designated Safeguarding Lead

Mr Joe White – Assistant Headteacher

### Deputy Designated Safeguarding Leads

#### Ifield School

Mrs Abigail Birch – Executive Headteacher

Miss Maddy Jones – Head of School

Mrs Emma Dodd – Assistant Headteacher

Mrs Glynda Cullen – Key Stage Five Teaching and Learning Lead

Mrs Sam Hargood – Key Stage Four Teaching & Learning Lead

Mr Paul Jackson – Deputy Director

Miss Denise Moore – Head of Sixth Form and LINK19 College

Named Safeguarding Governor for The Cedar Federation: Mr Andrew Sparks

### North Kent College

Designated Safeguarding Lead – Rhiannon Hughes

**This is a core policy that forms part of the induction for all staff. It is a requirement that all members of staff have access to this policy and sign to say that they have read and understood its content and Part 1, Keeping Children Safe in Education, September 2021.**

This policy will be reviewed at least annually and / or following any updates to national and local guidance procedures.

# Contents

	Page no
What to do if you have a welfare concern - flowchart	4
1. Introduction and ethos	5
2. Policy Context	6
3. Definition of safeguarding	6
4. Related safeguarding policies	7
5. Policy Compliance, Monitoring and Review	8
6. Key responsibilities	9
7. Recognising Indicators of abuse and neglect	11
8. Safeguarding and learner protection procedures	12
9. Record keeping	13
10. Multi-Agency Working	14
11. Confidentiality and information sharing	14
12. Complaints	15
13. Staff induction, awareness and training	15
14. Safe working practice	16
15. Staff supervision and support	16
16. Safer recruitment	17
17. Allegations against members of staff and volunteers	17
18. Safeguarding learners with special educational needs and disabilities	18
19. Peer on Peer Abuse	19
20. Gangs, County Lines, Violent Crime and Exploitation	20
21. Mental Health	20
22. Online safety	20
23. Curriculum and staying safe	23
24. The use of college premises by other organisations	23
25. Security	24
26. Local support	24
Appendix 1: What school and college staff should look out for	26
Appendix 2: Categories of Abuse	30
Appendix 3: Other forms of abuse specific to vulnerable adults	32
Appendix 4: National Support Organisations	34
Appendix 5: Further Safeguarding Information	36
Appendix 6: Keeping yourself safe when responding to disclosures	45
Appendix 7: Safeguarding Incident / Concern Form	46

# What to do if you have a welfare concern in LINK19 College

## Why are you concerned?

- For example
  - Something a young person has said – e.g. allegation of harm
  - Learner's appearance – may include unexplained marks as well as dress
  - Behaviour change
  - Witnessed concerning behaviour

## Act immediately record your concerns (If urgent, speak to DSAL first)

- Follow the colleges procedure ([Immediately record concerns and share with DSAL](#))
  - Reassure the learner
  - Clarify concerns if necessary (**TED: Tell, Explain, Describe**)
  - Use learner's own words
  - Sign and date your records
  - Seek support for yourself if required from DSAL

## Inform the Designated Safeguarding Adult Lead

**DSAL:** Miss Denise Moore – Head of LINK19 College Ltd

**Deputy DSAL:** Mr Martin Francis – LINK19 College Assistant Lead

**Named Safeguarding Director:** Miss Maddy Jones

Consider: is the learner at immediate risk of harm e.g. unsafe to go home?  
If so, then the DSAL must be informed immediately.

## Designated Safeguarding Adult Lead

- Consider whether the learner is at immediate risk of harm. E.g. unsafe to go home
- Access the Kent Safeguarding Support Level Guidance document and procedures:  
[www.kscmp.org.uk](http://www.kscmp.org.uk)
- Refer to other agencies as appropriate e.g. Internal or community services, LADO, Police or Request for support
  - If unsure then consult with The Central Duty Team Kent Adult Safeguarding Team (03000 416161)

## If you are unhappy with the response Staff:

- Follow local escalation procedures
  - Seek advice from the Central Duty Kent Adult Safeguarding Team (03000 416161)
  - [Follow the LINK19 College Whistleblowing Procedure](#)
  - [Contact the Safeguarding Director](#)
- Learners and Parents:**
- Follow college complaints procedures ([available upon request from the college office and on college websites](#))

## Record decision making and action taken in the learners' safeguarding file

## Monitor

Be clear about:

- What you will monitor e.g. behaviour trends, appearance etc.
- How long you will monitor
- Where, how and to whom you will feedback and how you will record

## Review and request further support (if necessary)

At all stages the learner's circumstances will be kept under review  
The DSAL/Staff will request further support if required to ensure the **learner's safety is paramount**

# 1. Introduction and ethos

- LINK19 College recognises our statutory our statutory responsibility to safeguard and promote the welfare of all children, young people and vulnerable adults. Safeguarding is everybody's responsibility and all those directly connected (staff, volunteers, governors, leaders, parents, families and learners) are an important part of the wider safeguarding system for children and young people and have an essential role to play in making this community safe and secure.
- Staff working with learners at LINK19 College are advised to maintain an attitude of 'it could happen here' where safeguarding is concerned.
- LINK19 College believe that the best interests of learners always come first. All learners have a right to be heard and to have their wishes and feelings taken into account and all LINK19 College learners regardless of age, gender, ability, culture, race, language, religion or sexual identity, have equal rights to protection.
- LINK19 College recognises the importance of providing an ethos and environment within college that will help learners to be safe and feel safe. In our college learners are respected and encouraged to talk openly. All our staff understand safe professional practice and adhere to our safeguarding policies.
- Our college core safeguarding principles are:
  - **Prevention** (e.g. positive, supportive, safe culture, curriculum and pastoral opportunities for learners, safer recruitment procedures);
  - **Protection** (by following the agreed procedures, ensuring all staff are trained and supported to recognise and respond appropriately and sensitively to safeguarding concerns);
  - **Support** (for all learners, parents and staff, and where appropriate specific interventions are required for those who may be at risk of harm);
  - **Working with parents and other agencies** (to ensure timely, appropriate communications and actions are undertaken when safeguarding concerns arise).
- LINK19 College expects that if any member of our community has a safeguarding concern about any learner or adult, they should act and act immediately.
- This policy is implemented in accordance with our compliance with the statutory guidance from the Department for Education, 'Keeping Children Safe in Education' 2020 (KCSIE) which requires individual schools and colleges to have an effective child protection policy.
- The procedures contained in this policy apply to all staff, including directors, temporary or third party agency staff and volunteers and are consistent with those outlined within KCSIE 2021.
- This policy is formulated in recognition that abuse of vulnerable adults is widespread, but frequently unrecognised in our society. Abuse can take place in any situation, care setting or college, as well as at home. Perpetration of abuse may be by someone in a position of trust, power or authority that uses his or her position to the detriment of their health, safety or welfare and general well-being of a vulnerable person. The perpetrator may be a relative with a voluntary or professional care role, friend or family member, or those charged with a voluntary or professional care role, another service user or a stranger.

## 2. Policy Context

- This policy has been developed in accordance with the principles established by the Children Acts 1989 and 2004 and related guidance. This includes:
  - DfE guidance Keeping Children Safe in Education 2021 (KCSIE)
  - Working Together to Safeguard Children 2018 (WTSC)
  - Ofsted: Education Inspection Framework' (2019)
  - Framework for the Assessment of Children in Need and their Families (2000)
  - Kent and Medway Safeguarding Children Procedures (Online)
  - The Education Act 2002
  - The Education (Independent School Standards) Regulations 2014
  - The Non-Maintained Special Schools (England) Regulations 2015
- Section 175 of the Education Act 2002 requires school governing bodies, local education authorities and further education institutions to make arrangements to safeguard and promote the welfare of all children who are pupils at a school, or who are students under 18 years of age. Such arrangements will have to have regard to any guidance issued by the Secretary of State.
- LINK19 College is currently operating in response to coronavirus (Covid-19), however, our safeguarding principles in accordance with KCSIE 2021 and related government guidance, remain the same. We will continue to follow government guidance and will amend this policy, as necessary.
- We acknowledge that some learners will return in September 2021 having been exposed to a range of adversity and trauma including bereavement, anxiety and in some cases increased welfare and safeguarding risks. We will work with local services (such as health and the local authority) to ensure necessary services and support are in place to support learners.

## 3. Definition of Safeguarding

- In line with KCSIE 2021, safeguarding and promoting the welfare of children is defined for the purposes of this policy as:
  - Protecting children from maltreatment;
  - 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; and
  - Take action to enable all children to have the best outcomes.
- The college acknowledges that safeguarding includes a wide range of specific issues including (but not limited to):
  - Abuse and neglect
  - Bullying (including cyberbullying)
  - Child abduction and community safety incidents
  - Children and the court system
  - Children with family members in prison
  - Children Missing Education (CME)
  - Child missing from home or care
  - Child Sexual Exploitation (CSE)

- Child Criminal Exploitation (CCE)
- Contextual Safeguarding (Risks outside the family home)
- County Lines
- Domestic Abuse
- Drugs and alcohol misuse
- Fabricated or induced illness
- Faith abuse
- Female Genital Mutilation (FGM)
- Forced marriage
- Gangs and youth violence
- Gender based abuse and violence against women and girls
- Hate
- Homelessness
- Honour based abuse
- Human trafficking and modern slavery
- Mental health
- Missing children and adults
- Modern Slavery
- Online safety
- Peer on Peer Abuse
- Preventing radicalisation and extremism
- Private fostering
- Relationship abuse
- Serious Violence
- Sexual violence and sexual harassment
- Upskirting
- Youth produced sexual imagery or “Sexting”

(Also see Annex A within ‘Keeping children safe in education’ 2021)

#### **4. Related safeguarding policies**

- This policy is one of a series in the college’s integrated safeguarding portfolio and should be read and actioned in conjunction with the policies as listed below. (to be read and followed alongside this document)
  - Behaviour Management, linked to the Use of Physical Intervention
  - Searching, screening and confiscation
  - Online Safety; Social Media and Mobile Technology
  - Anti-Bullying
  - Data Protection and Information Sharing
  - Image Use
  - Relationship & Sex Education
  - Personal and Intimate Care
  - Health and Safety, including plans for college reopening
  - Attendance
  - Risk Assessments (e.g. college trips, use of technology, college reopening)
  - First Aid and Accidents
  - Managing Allegations Against Staff
  - Code of Conduct for Staff (including Acceptable Use of Technology/AUP)
  - Safer Recruitment

- Whistle-Blowing
- Supporting learners with medical conditions

**Supporting Guidance (to be read and followed alongside this document)**

- Teachers Standards 2012
  - “Safeguarding Disabled Children– Practice Guidance” - DOH, 2009
  - “Guidance for Safer Working Practice for Adults who Work with Children and Young People in Education Settings” - Safer Recruitment Consortium, October 2015
  - “What to do if you are worried a child is being abused” – DfE, March 2015
  - KSCMP document: “Safe Practice with Technology – Guidance for Adults who Work with Children and Young People”
  - KCC Safeguarding Children and Child Protection – “Induction Leaflet Guidelines for School Staff”
  - KCC Guidelines for “Safeguarding Record Keeping in Schools”
  - KCC Advice notes - “Dealing with Disclosures in Schools”
  - Early Years Foundation Stage 2014 Welfare Requirements
  - Teaching Assistant Standards (2016)
  - Safer Recruitment
  - Keeping Children Safe in Education, September 2021
  - Safeguarding Vulnerable Groups Act 2006, by the Protection of Freedoms Act 2012
  - No secrets: Guidance on developing and implementing multi-agency policies and procedures to protect vulnerable adults from abuse – 2010
  - Safeguarding Adults – A National Framework of Standards for good practice and outcomes in adult protection work – 2005
  - Mental Capacity Act 2005 – (Including the Deprivation of Liberty Safeguards (DoLS))
- Policies are available for inspection on request.

## **5. Policy Compliance, Monitoring & Review**

- LINK19 College will review this policy at least annually. The policy will be revised following any national or local policy updates, any local safeguarding concerns and/or any changes to our procedures.
- All staff (including temporary staff and volunteers) will be provided with a copy of this policy and part one of KCSIE.
- Parents / carers can obtain a copy of the Safeguarding Children and Vulnerable Adults Policy and other related policies on request. Additionally, some of our policies can be viewed via the college website.
- The policy forms part of our quality improvement plan and will be reviewed annually by the board of directors which has responsibility for oversight of safeguarding systems.
- The Designated Safeguarding Adult Lead will ensure regular reporting on safeguarding activity and systems to the board. The board of directors will not receive details of individual learner situations or identifying features of families as part of their oversight responsibility.

## 6. Key responsibilities

- The board of directors of LINK19 College have read and will follow KCSIE 2021.
- The college has a nominated director for safeguarding named on the front of this document. The nominated director will support the DSAL and have oversight in ensuring that the college has an effective policy which interlinks with other related policies; that locally agreed procedures are in place and being followed; and that the policies and structures supporting safeguarding learners are reviewed at least annually and when required.
- The board of directors will ensure that the DSAL(s) is properly supported in their role.
- New guidance from the ESFA in September 2017 means the college will inform the ESFA if we are subject to an investigation by the local authority or the police. This applies only to safeguarding incidents where the institution or one of its sub-contractors is subject to an investigation.

### 6.1 Designated Safeguarding Adult Lead (DSAL)

- LINK19 College has appointed a member of the leadership team (Miss Denise Moore – Head of LINK19 College) as the Designated Safeguarding Adult Lead (DSAL). The DSAL has the overall responsibility for the day to day oversight of safeguarding and learner protection systems in college.
- Additionally, the college has an appointed Deputy DSAL, Martin Francis, LINK19 Assistant Lead who has delegated responsibilities and acts in the DSALs absence.
- Whilst the activities of the Designated Safeguarding Adult Lead may be delegated to the deputies, the ultimate lead responsibility for safeguarding and learner protection remains with the Designated Safeguarding Adult Lead and this responsibility will not be delegated.
- The DSAL will undergo appropriate and specific training to provide them with the knowledge and skills required to carry out their role. Deputy DSALs are trained to the same standard as the DSAL. The DSAL and any Deputy DSAL's training will be updated formally every two years but their knowledge and skills will be updated through a variety of methods (e.g. *e-Bulletins, conferences, local meetings, internal and external training*) at regular intervals, at least annually to keep up with any developments relevant to their role.
- The DSAL (and deputies) will be provided with sufficient time so they can provide appropriate support to staff and learners regarding any new safeguarding and welfare concerns following Covid-19. This may include handling of referrals to integrated social care and working with other agencies where appropriate.
- **It is the role of the DSAL to:**
  - Act as the central contact point for all staff to discuss any safeguarding concerns
  - Maintain a confidential recording system for safeguarding and learner protection concerns
  - Coordinate safeguarding action for individual learners
    - When supporting learners with a social worker or care leavers, the DSAL should have the details of the learner's social worker (with the DSAL liaising closely with appropriate agencies.)

- Liaise with other agencies and professionals in line with KCSIE 2021 and Working together to safeguard children 2018
- Ensure that locally established procedures as put in place by the three safeguarding partners (KSCMP) and / or Kent and Medway Safeguarding Adults Board (KMSAB), including referrals, are followed as necessary
- Represent, or ensure the college is appropriately represented at multi-agency safeguarding meetings.
- Manage and monitor the college's role in any multi-agency plan for a learner
- Be available during term time (during college hours) for staff in the college to discuss any safeguarding concerns.
- Help promote educational outcomes by sharing the information about the welfare, safeguarding and protection issues that learners are experiencing, or have experienced, with tutors and college leadership staff.
- Ensure adequate and appropriate DSAL cover arrangements in response to any closures and out of hours and/or out of term activities.
- Ensure all staff access appropriate safeguarding training and relevant updates in line with the recommendations within KCSIE (2021).

## 6.2 Members of staff

- **All members of staff have a responsibility to:**
  - provide a safe environment in which learners can learn
  - be prepared to identify learners who may benefit from additional support
  - consider wider environmental factors in a learner's life that may be a threat to their safety and/or welfare
  - to understand your colleges safeguarding policies and systems
  - to undertake regular and appropriate training which is regularly updated
  - be aware of the process of making referrals to adult social care and statutory assessment under the Children Act 1989
  - know what to do if a learner tells them that they are being abused or neglected and understand the impact abuse and neglect can have upon a learner
  - be able to identify and act upon indicators that learners are, or at risk of developing mental health issues
  - know how to maintain an appropriate level of confidentiality
  - be aware of the indicators of abuse and neglect so that they are able to identify cases of learners who may require help or protection

## 6.3 Learners and young people

- **Learners and young people (learners) have a right to:**
  - Feel safe, be listened to, and have their wishes and feelings taken into account
  - Contribute to the development of college safeguarding policies
  - Receive help from a trusted adult
  - Learn how to keep themselves safe by recognising when they are themselves at risk and how to get help when they need it, including online

## 6.4 Parents and Carers

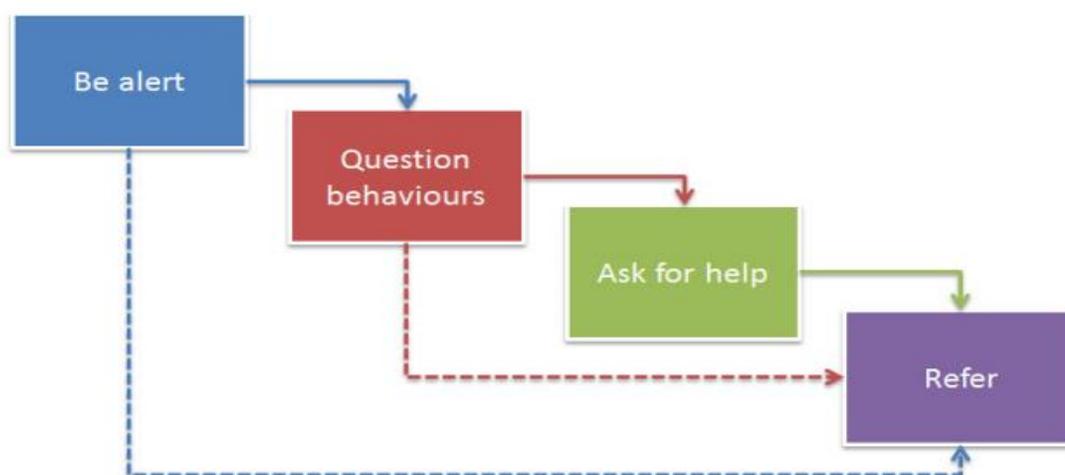
- **Parents/carers have a responsibility to:**
  - Understand and adhere to the relevant college policies and procedures

- Talk to their children about safeguarding issues with their children and support the college in their safeguarding approaches
- Identify behaviours which could indicate that their child is at risk of harm including online and seek help and support from the college, or other appropriate agencies

Parents can obtain a copy of the college Safeguarding Children and Vulnerable Adults Policy and other related policies on request and can view them via the college website:

## 7. Recognising Indicators of Abuse and Neglect

- All staff in college are made aware of the definitions and indicators of abuse and neglect as identified by Working Together to Safeguard Children (2018) and Keeping Children Safe in Education 2021. This is outlined locally within Kent Support Levels Guidance.
- Under this policy, learners aged 18 years and over are in the vulnerable adults category.
- LINK19 College recognise that when assessing whether a learner may be suffering actual or potential harm, the concern may be defined and include one or more of the following categories: -
  - Physical abuse
  - Sexual abuse
  - Emotional abuse
  - Neglect or acts of omission
  - Discriminatory abuse
  - Psychological abuse
  - Financial or material abuse
  - Institutional abuse
  - Domestic Abuse
- All members of staff are expected to be aware of and follow this approach if they are concerned about a learner:



'What to do if you are worried a child is being abused' 2015

- Members of staff are aware that concerns may arise in many different contexts and can vary greatly in terms of their nature and seriousness. The indicators of abuse and neglect can vary from learner to learner. Young adults develop and mature at different rates and all learners at LINK19 College have additional and or complex needs. What appears to be worrying behaviour for a particular learner may be less concerning for another due to the nature of their individual needs.
- It is important to recognise that indicators of abuse and neglect do not automatically mean a learner is being abused however all concerns should be taken seriously and explored by the DSAL on a case by case basis.
- Parental behaviours' may also indicate abuse or neglect, so staff should also be alert to parent-learner interactions or concerning parental behaviours; this could include parents who are under the influence of drugs or alcohol or if there is a sudden change in their mental health.
- Safeguarding incidents and/or behaviours can be associated with factors outside the college and / or can occur between learners and / or young people offsite. Vulnerable young adults can be at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and learners can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, and serious youth violence.
- By understanding the indicators of abuse and neglect, we can respond to problems as early as possible and provide the right support and services for the learner and their family.

## **8. Safeguarding children and vulnerable adult protection procedures**

- LINK19 College recognises that some learners have additional or complex needs and may require access to intensive or specialist services to support them.
- LINK19 College adheres to the Kent Safeguarding Children Multi-Agency Partnership Procedures (KSCMP)(Online). The full KSCMP procedures and additional guidance relating to specific safeguarding issues can be found on the KSCMP website [www.kscmp.org.uk](http://www.kscmp.org.uk). In addition, LINK19 College adheres to Kent and Medway Safeguarding Adults Board (KMSAB) procedures.
- All staff are aware of the process for making request for support referrals for statutory assessments under the Children Act 1989, along with the role they might be expected to play in such assessments.
- LINK19 College recognise that in situations where there are immediate safeguarding concerns identified in line with Support Level Guidance, it is NOT to investigate as a single agency but to act in line with KSCMP and or KMSAB guidance which may involve multi-agency decision making.
- If a learner is in immediate danger or is at risk of harm, a request for support should be made immediately to Adult Social Care and/or the police in line with KSCMP and KMSAB procedures.
- The DSAL may seek advice or guidance from Area Education Safeguarding Adviser from the Education Safeguarding Service or Kent and Medway Safeguarding Adults Board before deciding next steps.

- In the event of a request for support to Adult Social Care being necessary, parents/carers will be informed and consent to this will be sought by the DSAL in line with guidance provided by KSCMP and KMSAB.
  - Parents/carers will be informed unless there is a valid reason not to do so, for example, if to do so would put a child at risk of harm or would undermine a criminal investigation.
- If the DSAL is not immediately available to discuss an urgent concern, staff can seek advice from a Deputy DSAL or the Safeguarding Director, Maddy Jones. They may also seek advice from the Education Safeguarding Service or via consultation from a social worker or Adult Social Care. If anyone other than the DSAL makes a referral to external services, then they will inform the DSAL as soon as possible.
- The DSAL will keep all early help cases under constant review and consideration will be given to a request for support to Adult Social Care if the situation does not appear to be improving or is getting worse.
- If, after a request for support or any other planned external intervention, a learner's situation does not appear to be improving, the DSAL will consider following [KSCMP and or KMSAB escalation procedures](#) to ensure their concerns have been addressed and, most importantly, that the learner's situation improves. DSALs may request support with this via the Education Safeguarding Service or Adult Social Care.

## 9. Record keeping

- All safeguarding concerns, discussions and decisions and reasons for those decisions will be recorded in writing on the college safeguarding incident concern form and passed without delay to the DSAL. A body map will be completed if injuries have been observed.
- If members of staff are in any doubt about recording requirements, then they should discuss their concerns with DSAL.
- Records will be completed as soon as possible after the incident / event, using the learner's words and will be signed and dated by the member of staff. If there is an immediate concern the member of staff should consult with a DSAL before completing the form as reporting urgent concerns takes priority.
- Safeguarding/concern forms are kept in the staffroom, college office and shared area on staff network.
- Safeguarding records are kept for individual learners and are maintained separately from all other records relating to the learner in college. Safeguarding records are kept in accordance with data protection legislation and are retained centrally and securely by the DSAL. Safeguarding records are shared with staff on a 'need to know' basis only.
- All safeguarding records will be transferred in accordance with data protection legislation to a learner's subsequent college/setting, under confidential and separate cover. These will be given to the new DSAL and a receipt of delivery will be obtained.

- In addition to the safeguarding file, the DSAL will also consider if it would be appropriate to share any information with the DSAL at the new school or college in advance of a learner leaving. For example, information that would allow the new school or college to continue to provide support.
- The Chair of the board of directors and or the director with responsibility for safeguarding will be kept informed of any significant issues by the DSAL.

## 10. Multi-agency working

LINK19 College recognises and is committed to its responsibility to work within the KSCMP and KMSAB multi-agency safeguarding arrangements. The leadership team and DSAL will work to establish strong and co-operative local relationships with professionals in other agencies in line with statutory guidance.

- LINK19 College recognises the importance of multi-agency working and is committed to working alongside partner agencies to provide a coordinated response to promote children and young people's welfare and protect them from harm. This includes contributing to KSCMP and KMSAB processes as required. Such as, participation in relevant safeguarding multi-agency plans and meetings, including Child Protection Conferences, Core Groups, Strategy Meetings or other multi-agency meetings.

## 11. Confidentiality and information sharing

- LINK19 College recognises our duty to share relevant information with appropriate agencies in matters relating to safeguarding and learner protection at the earliest opportunity as per statutory guidance outlined within KCSIE 2021.
- All staff must be aware that they cannot promise confidentiality in situations which might compromise a learner's safety or wellbeing.
- The Head of College or DSAL will only disclose information about a learner on a 'need to know' basis.
- All members of staff must be aware that whilst they have duties to keep any information confidential, they also have a professional responsibility to share information with other agencies in order to safeguard learners.
- LINK19 College have a trained Data Protection Officer (DPO) as required by the General Data Protection Regulations (GDPR) to ensure that LINK19 College is compliant with all matters relating to confidentiality and information sharing requirements. The DPO is the SPS Data Protection Officer based at SPS DPO Services, iSystems Integration, Devonshire House, 29-31 Elmfield Road, Bromley, Kent BR1 1L. Email address: [sps-dpo-services@isystemsintegration.com](mailto:sps-dpo-services@isystemsintegration.com)
- The Data Protection Act 2018 and GDPR do not prevent the sharing of information for the purposes of keeping children and young people safe. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children (KCSIE 2021).
- DfE Guidance on Information Sharing (July 2018) provides further detail.

- If the college is made aware of any safeguarding concerns which they feel need to be shared with the wider community (including other local colleges) then advice will be sought from the Education Safeguarding team to ensure that the integrity of any subsequent investigations are maintained and that all members of the community are safeguarded.

## 12. Complaints

- The college has a **Complaints Procedure** available to parents, learners, members of staff and visitors who wish to report concerns which is available on request from LINK19 College.
- All reported concerns will be taken seriously and considered within the relevant and appropriate process. Anything that constitutes an allegation against a member of staff or volunteer will be dealt with under the specific **Procedures for Managing Allegations Against Staff policy**.

## 13. Staff induction, awareness and training

- All members of staff have been provided with a copy of part one of the *“Keeping Children Safe in Education”* (2021) which covers Safeguarding information for all staff.
- College leaders, including the DSAL will read the entire document.
- College leaders and all members of staff who work directly with learners will access Annex A within Keeping Children Safe in Education 2021.
- All members of staff have signed to confirm that they have read and understood Part One and Annex A KCSIE.
- The DSAL will ensure that all new staff and volunteers including agency, third party and temporary staff receive safeguarding training to ensure they are aware of the college’s internal safeguarding procedures as part of their induction.
- All staff members (including agency, third party and temporary staff) will receive appropriate safeguarding training to ensure they are aware of a range of safeguarding issues. This training will include online safety and will take place at least annually.
- In addition to specific safeguarding training, all staff will receive regular safeguarding updates for example, via email, e-bulletins, staff meetings and staff development days at least annually, to provide them with relevant skills and knowledge to safeguard learners effectively.
- Staff will be encouraged to contribute to and shape college safeguarding arrangements through regular safeguarding meetings.
- All members of staff (including agency, third party and temporary staff) will be made aware of the colleges expectations regarding safe and professional practice via the staff code of conduct and Acceptable Use Policy (AUP) which is provided and discussed as part of the induction process.

- The Head of College or DSAL will provide an annual report to the Board of Directors detailing safeguarding training undertaken by all staff and will maintain up to date register of who has been trained.
- Although LINK19 College has a nominated lead for the board of directors (Miss Maddy Jones), all members of the board will access appropriate safeguarding training which covers their specific strategic responsibilities on a regular basis.

## **14. Safe working practice**

- All members of staff are required to work within clear guidelines on Safe Working Practice as outlined in the college's Code of Conduct.
- Staff will be made aware of the college's Behaviour Management and Physical Intervention Policies, and any physical interventions / use of reasonable force (Positive Handling) must be in line with agreed policy and procedures and national guidance.
- All staff will be made aware of the professional risks associated with the use of social media and electronic communication (such as email, mobile phones, texting, social network sites etc.) Staff will adhere to relevant college policies including staff code of conduct, online safety and Acceptable Use policies.

## **15. Staff supervision and support**

- Any member of staff affected by issues arising from concerns for learner's welfare or safety can seek support from the DSAL.
- The induction process will include familiarisation with learner protection responsibilities and procedures to be followed if staff have any concerns about a learner's safety or welfare.
- The college will provide appropriate supervision and support for all members of staff to ensure that:
  - All staff are competent to carry out their responsibilities for safeguarding and promoting the welfare of learners and vulnerable adults
  - All staff are supported by the DSAL in their safeguarding role
  - All members of staff have regular reviews of their own practice to ensure they improve over time.
- The DSAL will also put staff in touch with outside agencies for professional support if they so wish. Staff can also approach organisations such as their Union, the Education Support Partnership or other similar organisations directly.

## **16. Safer recruitment**

- LINK19 College is committed to ensure that a safe culture is developed and that all steps are taken to recruit staff and volunteers who are safe to work with our learners/students and staff.
- LINK19 College will follow relevant guidance in Keeping Children Safe in Education 2021 (Section 3 ‘Safer Recruitment’) and from The Disclosure and Barring Service (DBS).
- The Directors and Leadership Team are responsible for ensuring that the college follows safe recruitment processes outlined within guidance.
- LINK19 College maintains an accurate Single Central Record (SCR) in line with statutory guidance.
- Directors will ensure that there is at least one of the persons who conducts an interview has completed Safer Recruitment Training.
- We are also committed to supporting the statutory guidance from the Department for Education on the application of the Childcare (Disqualification) Regulations 2009 and related obligations under the Childcare Act 2006 in schools.
- We advise all staff to disclose any reason that may affect their suitability to work with learners including convictions, cautions, court orders, reprimands and warnings.
- We will ensure that all staff and volunteers have read the staff code of conduct and staff handbook and understand that their behavior and practice must be in line with it.

## **17. Allegations against members of staff and volunteers**

- LINK19 College recognises that it is possible for any member of staff, including volunteers, directors, contractors, agency and third-party staff (including supply teachers) and visitors to behave in a way that:
  - Indicates they have harmed a child or young person, or may have harmed a child or young person;
  - Means they have committed a criminal offence against or related to a child, young person or vulnerable young adult;
  - behaved towards a child or children / young people in a way that indicates he or she may pose a risk of harm to children and or young person; or
  - behaved or may have behaved in a way that indicates they may not be suitable to work with children or vulnerable young adults.
- LINK19 College has a Managing Allegations Against Staff Policy.
- All staff and volunteers should feel able to raise concerns about poor or unsafe practice potential failures in the college safeguarding regime. The leadership team will take all concerns or allegations received seriously.
- Allegations should be referred immediately to the Head of LINK19 College who will contact the [Local Authority Designated Officer](#) (LADO) to agree further action to be taken in respect of the learner and staff member.

- In the event of allegations of abuse being made against the Head of LINK19 College, staff are advised that allegations should be reported to the chair of the LINK19 College board who will contact the LADO.
- All staff and volunteers should feel able to raise concerns about poor or unsafe practice and such concerns will always be taken seriously by the leadership team.
- All members of staff are made aware of the college's whistle-blowing procedure. It is a disciplinary offence not to report concerns about the conduct of a colleague that could place a learner at risk.
- Staff can access the NSPCC whistleblowing helpline if they do not feel able to raise concerns regarding learner protection failures internally.
  - Staff can call: 0800 028 0285 (8:00 AM to 8:00 PM Monday to Friday) or email: [help@nspcc.org.uk](mailto:help@nspcc.org.uk)
- LINK19 College has a legal duty to refer to the Disclosure and Barring Service (DBS) anyone who has harmed, or poses a risk of harm, to a learner, or if there is reason to believe the member of staff has committed one of a number of listed offences, and who has been removed from working (paid or unpaid) in regulated activity, or would have been removed had they not left. The DBS will consider whether to bar the person.
  - If these circumstances arise in relation to a member of staff at our college, a referral will be made as soon as possible after the resignation or removal of the individual in accordance with advice from the LADO and/or Schools Personnel Service.

### **When in doubt – consult**

## **18. Safeguarding learners with Special Educational Needs and Disabilities**

- LINK19 College acknowledges that learners with special educational needs and disabilities (SEND) can face additional safeguarding challenges as they may have an impaired capacity to resist or avoid abuse. They may have speech, language and communication needs which may make it difficult to tell others what is happening.
- LINK19 College will ensure that learners with SEND, specifically those with communication difficulties will be supported to ensure that their voice is heard and acted upon.
- Members of staff are encouraged to be aware that learners with SEND can be disproportionately impacted by safeguarding concerns such as bullying and exploitation.
- All members of staff will be encouraged to appropriately explore possible indicators of abuse such as behaviour/mood change or injuries and not to assume that they are related to the learner's disability and be aware that learners with SEND may not always outwardly display indicators of abuse. To address these additional challenges, our college will always consider extra pastoral support for learners with SEND.

## 19. Peer on Peer Abuse

- All members of staff at LINK19 College recognise that learners are capable of abusing their peers. LINK19 College believes that abuse is abuse and it will never be tolerated. All victims will be taken seriously and offered appropriate support, regardless of where the abuse takes place.
- LINK19 College recognises that peer on peer abuse can take many forms, including (but not limited to):
  - Bullying (including cyberbullying)
  - physical abuse which can include hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm
  - sexual violence and sexual harassment
  - 'upskirting', which 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
  - sexting (also known as youth produced sexual imagery)
  - initiation/hazing type violence and rituals.
- LINK19 College recognises youth produced sexual imagery (also known as "sexting") as a safeguarding issue; all concerns will be reported to and dealt with by the DSAL (or deputy).
  - We will follow the advice as set out in the non-statutory UKCIS guidance: ['Sexting in schools and colleges: responding to incidents and safeguarding young people'](#) and the local [KSCMP](#) guidance: "Responding to youth produced sexual imagery".
- When responding to concerns relating to child on child sexual violence or harassment, LINK19 College will follow guidance outlined in part five of KCSIE 2021 and ['Sexual Violence and Sexual Harassment Between Children in Schools and Colleges'](#).
- Staff and leadership are mindful that some peer on peer abuse issues may be affected by gender, age, ability and culture of those involved.
- All allegations of peer on peer abuse will be recorded, investigated, and dealt with in line with associated school policies, including safeguarding, anti-bullying and behaviour.
- Alleged victims, perpetrators and any other child or learner affected by peer on peer abuse will be supported with pastoral support and by working with parents / carers, and in cases of sexual assault, informing the police and Adult Social Care.

## 20. Gangs, County Lines, Violent Crime and Exploitation

- LINK19 College recognises the impact of gangs, county lines, serious violence, crime and exploitation. It is recognised that the initial response to victims is important and that staff will take any allegation seriously and work in ways that support vulnerable adults and keep them safe.
- All staff have been trained and recognise the need to be vigilant for the signs that may include, but not exclusively:

- Unexplained gifts/new possessions – these can indicate learners have been approached by/involved with individuals associated with criminal networks/gangs.
- Learners who go missing for periods of time or regularly come home late
- Learners who regularly miss school or education or do not take part in education
- Change in friendships/relationships with others/groups.
- Learners who associate with other young people involved in exploitation
- Learners who suffer from changes in emotional well-being
- Significant decline in performance.
- Signs of self-harm/significant change in wellbeing.
- Signs of assault/unexplained injuries.

## **21. Mental Health**

- All staff will be made aware that mental health difficulties can, in some cases, be an indicator that a learner has suffered or is at risk of suffering abuse, neglect or exploitation. Staff are aware of how learner’s experiences, can impact on their mental health, behaviour and education.
- Staff are well placed to observe learners 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 staff have a mental health concern about a learner that is also a safeguarding concern, immediate action should be taken by speaking to the DSAL or a deputy.

## **22. Online safety**

- It is recognised by LINK19 College that the use of technology presents challenges and risks to learners and adults both inside and outside of college.
- LINK19 College will empower, protect and educate the community in their use of technology and establish mechanisms to identify, intervene in, and escalate any incident where appropriate.
- LINK19 College identifies that the breadth of issues classified within online safety is considerable, but can be categorised into three areas of risk:
  - content: being exposed to illegal, inappropriate or harmful material; for example, pornography, fake news, racist or radical and extremist views;
  - contact: being subjected to harmful online interaction with other users; for example, commercial advertising as well as adults posing as children or young adults; and
  - conduct: personal online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images, or online bullying.
- The DSAL has overall responsibility for online safeguarding within the college but will liaise as necessary with other members of staff.
- LINK19 College uses a wide range of technology. This includes computers, laptops, tablets and other digital devices, the internet, our learning platform and email systems.

- All college owned devices and systems will be used in accordance with our acceptable use policies and with appropriate safety and security measures in place.
- LINK19 College recognises the specific risks that can be posed by mobile technology, including mobile phones and cameras. In accordance with KCSIE 2021 appropriate policies are in place that are shared and understood by all members of the college community.
  - Further information regarding the specific approaches relating to this can be found in the colleges Online Safety Policy, Acceptable Use Policy and Photographic Image Use Policy which can be found in the main college office.
- LINK19 College will do all that is reasonably possible to limit learners' exposure to online risks through the college IT systems and will ensure that appropriate filtering and monitoring systems are in place.
  - Website filtering and screening is covered by Forti Gate Web Filtering Systems and Zulu Desk to enforce tablet restrictions.
  - If learners or staff discover unsuitable sites or material, they are required to turn off the screen / monitor, report the concern immediately to the DSAL and report the URL of the site to the DSAL. The breach will be recorded and escalated as appropriate. Parents/carers will be informed of filtering breaches involving their young person. Any material that the college believes is illegal will be reported immediately to the appropriate agencies, such as: IWF, Kent Police or CEOP.
  - All users will be informed that use of our systems can be monitored, and that monitoring will be in line with data protection, human rights and privacy legislation.
  - Filtering breaches or concerns identified through our monitoring approaches will be recorded and reported to the DSAL, Head of NKC College and IT support staff, as appropriate.
  - Any access to material believed to be illegal will be reported immediately to the appropriate agencies, such as the [Internet Watch Foundation](#) and the police.
  - When implementing appropriate filtering and monitoring, LINK19 College will ensure that "over blocking" does not lead to unreasonable restrictions as to what learners can be taught with regards to online teaching and safeguarding.
- LINK19 College acknowledges that whilst filtering and monitoring is an important part of colleges online safety responsibilities, it is only one part of our approach to online safety.
  - Learners will use appropriate search tools, apps and online resources as identified following an informed risk assessment.
  - Learners internet use will be supervised by staff according to their age and ability.
  - Learners will be directed to use age appropriate online resources and tools by staff.

- Pupils and adults may have access to systems external to the college control such as mobile phones and other internet enabled devices and technology and where concerns are identified appropriate action will be taken.
- LINK19 College will ensure a comprehensive whole college curriculum response is in place to enable all learners to learn about and manage online risks effectively as part of providing a broad and balanced curriculum.
- LINK19 College will build a partnership approach to online safety and will support parents / carers to become aware and alert by providing information on the college website and within college newsletters.
- LINK19 College will ensure that online safety training for all staff is integrated, aligned and considered as part of our overarching safeguarding approach.
- The DSAL will respond to online safety concerns in line with the safeguarding and child protection and other associated policies such as online safety, anti-bullying and behaviour.
  - Internal sanctions and/or support will be implemented as appropriate.
  - Where necessary, concerns will be escalated and reported to relevant partner agencies in line with local policies and procedures.

**Where learners are asked to learn online at home in response to a full or partial closure:**

- LINK19 College will ensure any remote sharing of information, communication and use of online learning tools and systems will be in line with privacy and data protection requirements.
- All communication with learners and parents/carers will take place using college provided or approved communication channels; for example, college provided email accounts and phone numbers and/or agreed systems e.g. Microsoft Teams, Skype for Business or equivalent.
  - Any pre-existing relationships or situations which mean this cannot be complied with will be discussed with the DSAL.
- Staff and learners will engage with remote teaching and learning in line with existing behaviour principles as set out in our college behavior and wellbeing policy / code of conduct and acceptable use policies.
- Staff and learners will be encouraged to report issues experienced at home and concerns will be responded to in line with safeguarding and other relevant policies.
- When delivering remote learning, staff will follow our Remote Learning Acceptable Use Policy (AUP).
- Parents /carers will be made aware of what their children are being asked to do online, including the sites they will be asked to access. LINK19 College will continue to be clear who from the school their child is going to be interacting with online.

- Parents/carers will be encouraged to ensure learners are appropriately supervised online and that appropriate parent controls are implemented at home.

## **23. Curriculum and staying safe**

- LINK19 College will ensure that learners are taught about safeguarding, including online safety, as part of providing a broad and balanced curriculum.
- We recognise that colleges play an essential role in helping learners to understand and identify the parameters of what is appropriate learner and adult behaviour; what is 'safe'; to recognise when they and others close to them are not safe; and how to seek advice and support when they are concerned.
- Our curriculum provides opportunities for increasing self-awareness, self-esteem, social and emotional understanding, assertiveness and decision making so that learners have a range of age appropriate contacts and strategies to ensure their own protection and that of others.
- LINK19 College is aware of the most recent communication from the DfE on the mandatory implementation of Relationships Education, Relationships and Sex and Health Education and will ensure that this is embedded into the curriculum.
- Our college systems support learners to talk to a range of staff. Learners will be listened to and heard and their concerns will be taken seriously and acted upon as appropriate.

## **24. The use of college premises by other organisations**

- Where services or activities are provided separately by another body using the college premises, the Head of LINK19 College and Board of Directors will seek written assurance that the organisation concerned has appropriate policies and procedures in place with regard to safeguarding learners and learner protection and that relevant safeguarding checks have been made in respect of staff and volunteers.
- If this assurance is not achieved, then an application to use premises will be refused.

## **25. Security**

- All members of staff have a responsibility for maintaining awareness of buildings and grounds security and for reporting concerns that may come to light. Staff will be expected to adhere to any safety arrangements implemented because of COVID-19 restrictions.
- Appropriate checks will be undertaken in respect of visitors and volunteers coming into college as outlined within guidance. Visitors will be expected to sign in and out via the office visitors log and to display a visitor's badge whilst on college site. Visitors will be expected to adhere to any safety arrangements implemented because of COVID-19 restrictions.
- Any individual who is not known or identifiable on site should be challenged for clarification and reassurance.

- The college will not accept the behaviour of any individual (parent or other) that threatens college security or leads others (child, learner or adult) to feel unsafe. Such behaviour will be treated as a serious concern and may result in a decision to refuse access for that individual to the college site.

## 26. Local support

- All members of staff in LINK19 College are made aware of local support available
  - **Contact details for Area Safeguarding Adviser (Education Safeguarding Team)**
    - [www.kelsi.org.uk/support-for-children-and-young-people/child-protection-and-safeguarding/safeguarding-contacts](http://www.kelsi.org.uk/support-for-children-and-young-people/child-protection-and-safeguarding/safeguarding-contacts)
    - Gravesham area office: 03000 412445
  - **Contact details for Online Safety in the Education Safeguarding Team**
    - Rebecca Avery, Education Safeguarding Adviser (Online Protection):
    - Emma Jenkins, Online Safety Development Officer
    - 03000 415797
    - [esafetyofficer@theeducationpeople.org](mailto:esafetyofficer@theeducationpeople.org) (non-urgent issues only)
  - **Contact details for the LADO**
    - Telephone: 03000 410888
    - Email: [kentchildrenslado@kent.gov.uk](mailto:kentchildrenslado@kent.gov.uk)
  - **Adult Social Work Services**
    - Telephone: 03000 416161
    - Email: [social.services@kent.gov.uk](mailto:social.services@kent.gov.uk)
  - **Kent Police**
    - 101 (or 999 if there is an immediate risk of harm)
  - **Kent Prevent Education Officer**
    - 03000 413439
  - **Kent Safeguarding Children Multi-agency Partnership**
    - [kscmp@kent.gov.uk](mailto:kscmp@kent.gov.uk)
    - 03000 421126
  - **Kent Adult Safeguarding (KAS)**
    - New Cases
      - [AdultsSafeguardingCRU@Kent.gov.uk](mailto:AdultsSafeguardingCRU@Kent.gov.uk)
      - 03000 416161
    - Young Peoples Team
      - [DGSSYoungPeoplesTeam@kent.gov.uk](mailto:DGSSYoungPeoplesTeam@kent.gov.uk)
      - 03000 413232

*LINK19 College is committed to achieving Best Value in all decisions made. We use the principles of Best Value as they apply to securing continuous improvement.*

SINGLE EQUALITIES SCHEME IMPACT ASSESSMENT

This policy has been developed to ensure that there is no negative or adverse impact on any individual or group in terms of disability, race, belief, gender, sexual orientation or age. All opportunities for potential positive impact on individuals, groups and the community are embedded within the ethos, vision and values of the college.

Reviewed Date: Spring 2021- updated Autumn 2021

Review Date: Autumn 2022

Signed by Chair of Board:.....

Signed by Head of College:.....

## **Appendix 1: What school and college staff should look out for**

### **(See Keeping Children Safe in Education 2020 – Part 1)**

#### **Abuse and neglect**

Knowing what to look for is vital to the early identification of abuse and neglect. All staff should be aware of indicators of abuse and neglect so that they are able to identify cases of children who may be in need of help or protection. If staff are unsure, they should always speak to the designated safeguarding adult lead (or deputy).

All school and college staff should be 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.

All staff should be aware that safeguarding incidents and/or behaviours can be associated with factors outside the school or college and/or can occur between children outside of these environments. All staff, but especially the designated safeguarding lead (and deputies) 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 exploitation, criminal exploitation, and serious youth violence.

#### **Indicators of abuse and neglect**

**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. 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.

**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.

**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.

**Sexual abuse:** involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The

activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. 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) in education and all staff should be aware of it and their college's policy and procedures for dealing with the situation.

**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.

### **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, alcohol abuse, deliberately missing education and consensual and non-consensual sharing of nude and semi-nude images and/or videos can be signs that children and vulnerable adults are at risk.

### **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 or vulnerable adult into 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 and vulnerable adults, both male and female and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation.

#### **Child Sexual Exploitation (CSE)**

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

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.

Further information about CSE including definitions and indicators is included in Annex B.

### **Child Criminal Exploitation (CCE)**

Some specific forms of CCE can include children or vulnerable adults 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.

Children and vulnerable adults 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.

### **Peer on peer abuse**

All staff should be aware that children and vulnerable adults can abuse other children and vulnerable adults (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 their colleges 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 peer on peer abuse they should speak to their designated safeguarding lead or deputy.

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 vulnerable adults and in worst case scenarios a culture that normalises abuse leading to children and vulnerable adults accepting it as normal and not coming forward to report it.

Peer on peer 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);

- sexual violence, such as rape, assault by penetration and sexual assault; (this may include an online element which facilitates, threatens and/or encourages sexual violence);
- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse;
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party;
- consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery);
  - upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm; 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 regard to peer on peer abuse and the important role they have to play in preventing it and responding where they believe a child or vulnerable adult may be at risk from it.

### **Serious violence**

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 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.

All staff should be aware of the range of risk factors which increase the likelihood of involvement in serious violence, such as being male, having been frequently absent or permanently excluded from school, having experienced child maltreatment and having been involved in offending, such as theft or robbery. Advice for schools and colleges is provided in the Home Office's Preventing youth violence and gang involvement and its Criminal exploitation of children and vulnerable adults: county lines guidance.

### **Female Genital Mutilation**

Whilst all staff should speak to the designated safeguarding adult 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.

### **Mental Health**

All staff should also be aware that mental health problems can, in some cases, 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. 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.

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

Schools and colleges can access a range of advice to help them identify children in need of extra mental health support, this includes working with external agencies. More information can be found in the mental health and behaviour in schools' guidance, which LINK19 follows in line with best practice. Public Health England has produced a range of resources to support secondary school teachers to promote positive health, wellbeing and resilience among children. See Rise Above for links to all materials and lesson plans.

If staff have a mental health concern about a child or vulnerable adult that is also a safeguarding concern, immediate action should be taken, following their child protection policy and speaking to the designated safeguarding lead or a deputy.

## Appendix 2

### Categories of Abuse

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

**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. They may be abused by an adult or adults or another child or children. It should be noted that abuse can be carried out both on and offline and be perpetrated by men, women and children.

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

#### **Signs that MAY INDICATE Sexual Abuse**

- Sudden changes in behaviour and college performance
- Displays of affection which are sexual and age inappropriate
- Self-harm, self-mutilation or attempts at suicide
- Alluding to secrets which they cannot reveal
- Tendency to cling or need constant reassurance
- Regression to younger behaviour for example thumb sucking, playing with discarded toys, acting like a baby
- Distrust of familiar adults e.g. anxiety of being left with relatives, a child minder or lodger
- Unexplained gifts or money
- Depression and withdrawal
- Fear of undressing for PE
- Sexually transmitted disease
- Fire setting

**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.

#### **Signs that MAY INDICATE physical abuse**

- Bruises and abrasions around the face
- Damage or injury around the mouth
- Bi-lateral injuries such as two bruised eyes
- Bruising to soft area of the face such as the cheeks
- Fingertip bruising to the front or back of torso
- Bite marks
- Burns or scalds (unusual patterns and spread of injuries)
- Deep contact burns such as cigarette burns
- Injuries suggesting beatings (strap marks, welts)
- Covering arms and legs even when hot

- Aggressive behaviour or severe temper outbursts.
- Injuries need to be accounted for. Inadequate, inconsistent or excessively plausible explanations or a delay in seeking treatment should signal concern.

**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 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.

**Signs that MAY INDICATE emotional abuse**

- Over reaction to mistakes
- Lack of self-confidence/esteem
- Sudden speech disorders
- Self-harming
- Eating Disorders
- Extremes of passivity and/or aggression
- Compulsive stealing
- Drug, alcohol, solvent abuse
- Fear of parents being contacted
- Unwillingness or inability to play
- Excessive need for approval, attention and affection

**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 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.

**Signs that MAY INDICATE neglect.**

- Constant hunger
- Poor personal hygiene
- Constant tiredness
- Inadequate clothing
- Frequent lateness or non-attendance at college
- Untreated medical problems
- Poor relationship with peers
- Compulsive stealing and scavenging
- Rocking, hair twisting and thumb sucking
- Running away
- Loss of weight or being constantly underweight
- Low self esteem

## **Appendix 3**

### **Other forms of abuse specific to vulnerable adults**

**Discriminatory:** including that based on a person's ethnic origin, religion, language, age, sexuality, gender, disability and other forms of harassment, slurs or similar treatment.

#### **Signs that MAY INDICATE discrimination**

- Lack of respect shown to an individual
- Failure to respect dietary needs
- Failure to respect cultural and religious needs
- Signs of substandard services offered to an individual
- Exclusion from rights and services afforded to citizens e.g. health, education, employment, criminal justice and civic status

**Psychological:** including emotional abuse, threats of harm or abandonment, deprivation of contact or communication, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, isolation or withdrawal from services or supportive networks.

#### **Signs that MAY INDICATE psychological abuse**

- Change in appetite
- Low self-esteem, deference, positivity and resignation
- Unexplained fear, defensiveness, ambivalence
- Emotional withdrawal
- Person managing care uses bullying, intimidation or threats to reduce desired behaviour
- Person managing care has punitive approach to bodily functions or incontinence.

**Financial or material abuse:** including theft, fraud, exploitation, pressure in connection with wills, property or inheritance or financial transactions, or the misuse or misappropriation of property, possessions or benefits.

#### **Signs that MAY INDICATE financial or material abuse**

- Recent acquaintances expressing sudden or disproportionate affection for a person with money or property
- Lack of records and accounting of where money is spent
- Power of attorney or enduring power of attorney obtained when a person is unable to comprehend and give consent
- Withholding money
- Unusual interest shown by family or others in the person's assets
- Person managing financial affairs is evasive or uncooperative
- Selling or offering to sell possessions of a vulnerable adult who does not have the capacity to consent or know the full value of those possessions.

**Institutional:** indicated by repeated instances of unsatisfactory professional practice, pervasive ill treatment or gross misconduct indicating an abusive climate.

#### **Signs that MAY INDICATE institutional abuse**

- Inappropriate or poor care
- Misuse of medication

- Inappropriate restraint
- Sensory deprivation e.g. denial of use of hearing aid
- Lack of recording on client files
- Lack of respect shown to person
- Denial of visitors or phone calls
- Restricted access to toilet or bathing facilities
- Restricted access to appropriate privacy or personal dignity
- Lack of flexibility and choice
- Lack of personal clothing and possessions
- Lack of privacy
- Lack of adequate procedures e.g. medication
- Controlling relationships between staff and learners
- Poor professional practice
- lack of response to complaints

## Appendix 4: National Support Organisations

### Support for staff

- Education Support Partnership: [www.educationsupportpartnership.org.uk](http://www.educationsupportpartnership.org.uk)
- Professional Online Safety Helpline: [www.saferinternet.org.uk/helpline](http://www.saferinternet.org.uk/helpline)

### Support for learners

- NSPCC: [www.nspcc.org.uk](http://www.nspcc.org.uk)
- ChildLine: [www.childline.org.uk](http://www.childline.org.uk)
- Papyrus: [www.papyrus-uk.org](http://www.papyrus-uk.org)
- The Mix: [www.themix.org.uk](http://www.themix.org.uk)
- Shout: [www.giveusashout](http://www.giveusashout)
- Fearless: [www.fearless.org](http://www.fearless.org)

### Support for adults

- Family Lives: [www.familylives.org.uk](http://www.familylives.org.uk)
- Crime Stoppers: [www.crimestoppers-uk.org](http://www.crimestoppers-uk.org)
- Victim Support: [www.victimsupport.org.uk](http://www.victimsupport.org.uk)
- The Samaritans: [www.samaritans.org](http://www.samaritans.org)
- NAPAC (National Association for People Abused in Childhood): [napac.org.uk](http://napac.org.uk)
- MOSAC: [www.mosac.org.uk](http://www.mosac.org.uk)
- Action Fraud: [www.actionfraud.police.uk](http://www.actionfraud.police.uk)
- Shout: [www.giveusashout](http://www.giveusashout)

### Support for Learning Disabilities

- Respond: [www.respond.org.uk](http://www.respond.org.uk)
- Mencap: [www.mencap.org.uk](http://www.mencap.org.uk)

### Domestic Abuse

- Refuge: [www.refuge.org.uk](http://www.refuge.org.uk)
- Women's Aid: [www.womensaid.org.uk](http://www.womensaid.org.uk)
- Men's Advice Line: [www.mensadvice.org.uk](http://www.mensadvice.org.uk)
- Mankind: [www.mankindcounselling.org.uk](http://www.mankindcounselling.org.uk)
- Domestic abuse services: [www.domesticabuseservices.org.uk](http://www.domesticabuseservices.org.uk)
- National Domestic Abuse Helpline: [www.nationaldahelpline.org.uk](http://www.nationaldahelpline.org.uk)
- Respect Phonenumber: [www.respectphonenumber.org.uk](http://www.respectphonenumber.org.uk)

### Honour based Abuse

- Forced Marriage Unit: <https://www.gov.uk/guidance/forced-marriage>
- FGM Factsheet:  
[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/496415/6\\_1639\\_HO\\_SP\\_FGM\\_mandatory\\_reporting\\_Fact\\_sheet\\_Web.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/496415/6_1639_HO_SP_FGM_mandatory_reporting_Fact_sheet_Web.pdf)
- Mandatory reporting of female genital mutilation: procedural information:  
[www.gov.uk/government/publications/mandatory-reporting-of-female-genital-mutilation-procedural-information](http://www.gov.uk/government/publications/mandatory-reporting-of-female-genital-mutilation-procedural-information)

### **Contextual Safeguarding, Peer on Peer abuse, Sexual Exploitation and Criminal Exploitation:**

- Contextual Safeguarding Network: <https://contextualsafeguarding.org.uk>
- National Crime Agency: [www.nationalcrimeagency.gov.uk/who-we-are](http://www.nationalcrimeagency.gov.uk/who-we-are)
- Rape Crisis: <https://rapecrisis.org.uk>
- Lucy Faithfull Foundation: [www.lucyfaithfull.org.uk](http://www.lucyfaithfull.org.uk)
- Brook: [www.brook.org.uk](http://www.brook.org.uk)
- Victim Support: [www.victimsupport.org.uk](http://www.victimsupport.org.uk)
- Anti-Bullying Alliance: [www.anti-bullyingalliance.org.uk](http://www.anti-bullyingalliance.org.uk)
- Disrespect Nobody: [www.disrespectnobody.co.uk](http://www.disrespectnobody.co.uk)
- Upskirting – know your rights: [www.gov.uk/government/news/upskirting-know-your-rights](http://www.gov.uk/government/news/upskirting-know-your-rights)

### **Substance Misuse**

- We are with you (formerly Addaction): [www.wearewithyou.org.uk/services/kent-for-young-people/](http://www.wearewithyou.org.uk/services/kent-for-young-people/)
- Talk to Frank: [www.talktofrank.com](http://www.talktofrank.com)

### **Mental Health**

- Mind: [www.mind.org.uk](http://www.mind.org.uk)
- Moodspark: <https://moodspark.org.uk>
- Young Minds: [www.youngminds.org.uk](http://www.youngminds.org.uk)
- We are with you (formerly Addaction): [www.wearewithyou.org.uk/services/kent-for-young-people/](http://www.wearewithyou.org.uk/services/kent-for-young-people/)

### **Online Safety**

- CEOP: [www.ceop.police.uk](http://www.ceop.police.uk)
- Internet Watch Foundation (IWF): [www.iwf.org.uk](http://www.iwf.org.uk)
- Think U Know: [www.thinkuknow.co.uk](http://www.thinkuknow.co.uk)
- Childnet International: [www.childnet.com](http://www.childnet.com)
- UK Safer Internet Centre: [www.saferinternet.org.uk](http://www.saferinternet.org.uk)
- Report Harmful Content: <https://reportharmfulcontent.com>
- Parents Info: [www.parentinfo.org](http://www.parentinfo.org)
- Marie Collins Foundation: [www.mariecollinsfoundation.org.uk](http://www.mariecollinsfoundation.org.uk)
- Internet Matters: [www.internetmatters.org](http://www.internetmatters.org)
- NSPCC / Net Aware: [www.nspcc.org.uk/onlinesafety](http://www.nspcc.org.uk/onlinesafety) and [www.net-aware.org.uk](http://www.net-aware.org.uk)
- Get safe Online: [www.getsafeonline.org](http://www.getsafeonline.org)
- Stop it Now!: [www.stopitnow.org.uk](http://www.stopitnow.org.uk)

### **Radicalisation and hate**

- Educate against Hate: [www.educateagainsthate.com](http://www.educateagainsthate.com)
- Counter Terrorism Internet Referral Unit: [www.gov.uk/report-terrorism](http://www.gov.uk/report-terrorism)
- True Vision: [www.report-it.org.uk](http://www.report-it.org.uk)

## **Appendix 5: Further Safeguarding Information (See Annex B of Keeping Children Safe in Education 2021)**

### **Children and the court system**

Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. There are two age appropriate guides to support children [5-11-year olds](#) and [12-17 year olds](#).

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

Making child arrangements via the family courts following separation can be stressful and entrench conflict in families. This can be stressful for children. The Ministry of Justice has launched an online [child arrangements information tool](#) with clear and concise information on the dispute resolution service. This may be useful for some parents and carers.

### **Children missing from education**

All staff should be aware that children and vulnerable adults going missing, particularly repeatedly, can act as a vital warning sign of a range of safeguarding possibilities. This may include abuse and neglect, which may include sexual abuse or exploitation and can also be a sign of child criminal exploitation including involvement in county lines. It may indicate mental health difficulties, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation, honour based abuse or risk of forced marriage. Early intervention is necessary to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child going missing in future. Staff should be aware of their school's or college's unauthorised absence and children missing from education procedures.

### **Children with family members in prison**

Approximately 200,000 children in England and Wales have a parent sent to prison each year. These children are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. The National Information Centre on Children of Offenders ([NICCO](#)) provides information designed to support professionals working with offenders and their children, to help mitigate negative consequences for those children.

### **Child Criminal Exploitation (CCE) and Child Sexual Exploitation (CSE)**

We know that different forms of harm often overlap, and that perpetrators may subject children and young people to multiple forms of abuse, such as criminal exploitation (including county lines) and sexual exploitation.

In some cases the exploitation or abuse will be in exchange for something the victim needs or wants (for example, money, gifts or affection), and/or will be to the financial benefit or other advantage, such as increased status, of the perpetrator or facilitator.

Children and vulnerable adults can be exploited by adult males or females, as individuals or in groups. They may also be exploited by other children and vulnerable adults, who themselves may be experiencing exploitation – where this is the case, it is important that the child perpetrator is also recognised as a victim.

Whilst the age and stage of the child or vulnerable adult may be a contributing factor for an imbalance of power, there are a range of other factors that could make a child more vulnerable to exploitation,

including, sexual identity, cognitive ability, learning difficulties, communication ability, physical strength, status, and access to economic or other resources.

Some of the following can be indicators of both child criminal and sexual exploitation where children and vulnerable adults:

- appear with unexplained gifts, money or new possessions;
- associate with other children involved in exploitation;
- suffer from changes in emotional well-being;
- misuse drugs and alcohol;
- go missing for periods of time or regularly come home late; and
- regularly miss school or education or do not take part in education.

Children and vulnerable adults who have been exploited will need additional support to help maintain them in education.

CSE 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.

Some additional specific indicators that may be present in CSE are children and vulnerable adults who:

- have older boyfriends or girlfriends; and
- suffer from sexually transmitted infections, display sexual behaviours beyond expected sexual development or become pregnant.

Further information on signs of a child's involvement in sexual exploitation is available in Home Office guidance: Child sexual exploitation: guide for practitioners.

## **County Lines**

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs using dedicated mobile phone lines or other form of "deal line". This activity can happen locally as well as across the UK - no specified distance of travel is required. Children and vulnerable adults are exploited to move, store and sell drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims.

Children and vulnerable adults can be targeted and recruited into county lines in a number of locations including schools (mainstream and special), further and higher educational institutions, pupil referral units, children's homes and care homes.

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

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

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

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

## **Domestic abuse**

The Domestic Abuse Act 2021 received Royal Assent on 29 April 2021. The Act introduces the first ever statutory definition of domestic abuse and recognises the impact of domestic abuse on children or vulnerable adults, as victims in their own right, if they see, hear or experience the effects of abuse. The statutory definition of domestic abuse, based on the previous cross-government definition, ensures that different types of relationships are captured, including ex-partners and family members. The definition captures a range of different abusive behaviours, including physical, emotional and economic abuse and coercive and controlling behaviour. Both the person who is carrying out the behaviour and the person to whom the behaviour is directed towards must be aged 16 or over and they must be “personally connected” (as defined in section 2 of the 2021 Act).

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child/adolescent to parent violence and abuse. Anyone can be a victim of domestic abuse, regardless of sexual identity, age, ethnicity, socioeconomic status, sexuality or background and domestic abuse can take place inside or outside of the home. The government will issue statutory guidance to provide further information for those working with domestic abuse victims and perpetrators, including the impact on children and vulnerable adults.

All children and vulnerable adults can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Exposure to domestic abuse and/or violence can have serious, long lasting emotional and psychological impact on children and vulnerable adults. In some cases, a child or vulnerable adult may blame themselves for the abuse or may have had to leave the family home as a result.

Young people can also experience domestic abuse within their own intimate relationships. This form of peer on peer abuse is sometimes referred to as ‘teenage relationship abuse’. Depending on the age of the young people, this may not be recognised in law under the statutory definition of ‘domestic abuse’ (if one or both parties are under 16). However, as with any child under 18, where there are concerns about safety or welfare, child safeguarding procedures should be followed and both young victims and young perpetrators should be offered support. The Act’s provisions, including the new definition, will be commenced over the coming months.

## Operation Encompass

[Operation Encompass](#) operates in all police forces across England. It helps police and schools work together to provide emotional and practical help to children. The system ensures that when police are called to an incident of domestic abuse, where there are children in the household who have experienced the domestic incident, the police will inform the key adult (usually the designated safeguarding lead) in school before the child or children arrive at school the following day. This ensures that the school has up to date relevant information about the child's circumstances and can enable support to be put in place, according to the child's needs. Operation Encompass does not replace statutory safeguarding procedures. Where appropriate, the police and/or schools should make a referral to children's social care if they are concerned about a child's welfare. More information about the scheme and how schools can become involved is available on the Operation Encompass website.

## National Domestic Abuse Helpline

Refuge runs the National Domestic Abuse Helpline, which can be called free of charge and in confidence, 24 hours a day on 0808 2000 247. Its website provides guidance and support for potential victims, as well as those who are worried about friends and loved ones. It also has a form through which a safe time from the team for a call can be booked.

Additional advice on identifying children who are affected by domestic abuse and how they can be helped is available at:

- [NSPCC- UK domestic-abuse Signs Symptoms Effects](#)
- [Refuge what is domestic violence/effects of domestic violence on children](#)
- [Safelives: young people and domestic abuse.](#)
- Domestic abuse: specialist sources of support - GOV.UK [www.gov.uk](http://www.gov.uk) (includes information for adult victims, young people facing abuse in their own relationships and parents experiencing child to parent violence/abuse)
- Home: Operation Encompass (includes information for schools on the impact of domestic abuse on children)

## Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a young person's welfare. The designated safeguarding adult lead (and any deputies) should be aware of contact details and referral routes in to the Local Housing Authority so they can raise/progress concerns at the earliest opportunity. Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property. Whilst referrals and or discussion with the Local Housing Authority should be progressed as appropriate, and in accordance with local procedures, this does not, and should not, replace a referral into children's social care where a child has been harmed or is at risk of harm.

The Homelessness Reduction Act 2017 places a new legal duty on English councils so that everyone who is homeless or at risk of homelessness will have access to meaningful help including an assessment of their needs and circumstances, the development of a personalised housing plan, and work to help them retain their accommodation or find a new place to live. The following factsheets usefully summarise the new duties: [Homeless Reduction Act Factsheets](#). The new duties shift focus to early intervention and encourage those at risk to seek support as soon as possible, before they are facing a homelessness crisis.

In most cases school and college staff will be considering homelessness in the context of children who live with their families, and intervention will be on that basis. However, it should also be recognised in

some cases 16 and 17 year olds could be living independently from their parents or guardians, for example through their exclusion from the family home, and will require a different level of intervention and support. Children’s services will be the lead agency for these young people and the designated safeguarding adult lead (or a deputy) should ensure appropriate referrals are made based on the child’s circumstances. The department and the Ministry of Housing, Communities and Local Government have published joint statutory guidance on the provision of accommodation for 16 and 17 year olds who may be homeless and/ or require accommodation: [here](#).

### **So-called ‘honour-based’ abuse (Including Female Genital Mutilation and Forced Marriage)**

So-called ‘honour-based’ abuse (HBA) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing. Abuse committed in the context of preserving “honour” often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take. All forms of HBA are abuse (regardless of the motivation) and should be handled and escalated as such. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBA, or already having suffered HBA.

### **Actions**

If staff have a concern regarding a child that might be at risk of HBA or who has suffered from HBA, they should speak to the designated safeguarding adult lead (or deputy). As appropriate, the designated safeguarding lead (or deputy) will activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and social care. Where FGM has taken place, since 31 October 2015 there has been a mandatory reporting duty placed on teachers that requires a different approach (see following section).

### **FGM**

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 harmful consequences.

### **FGM mandatory reporting duty for teachers**

Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a statutory duty upon teachers along with regulated health and social care professionals in England and Wales, to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Those failing to report such cases will face disciplinary sanctions. It will be rare for teachers to see visual evidence, and they should not be examining pupils or students, but the same definition of what is meant by “to discover that an act of FGM appears to have been carried out” is used for all professionals to whom this mandatory reporting duty applies. Information on when and how to make a report can be found at: [Mandatory reporting of female genital mutilation procedural information](#).

Teachers **must** personally report to the police cases where they discover that an act of FGM appears to have been carried out. Unless the teacher has good reason not to, they should still consider and discuss any such case with the school’s or college’s designated safeguarding adult lead (or deputy) and involve children’s social care as appropriate. The duty does not apply in relation to at risk or suspected cases (i.e. where the teacher does not discover that an act of FGM appears to have been carried out, either through disclosure by the victim or visual evidence) or in cases where the woman is 18 or over. In these

cases, teachers should follow local safeguarding procedures. The following is a useful summary of the FGM mandatory reporting duty: [FGM Fact Sheet](#).

Further information can be found in the Multi-agency statutory guidance on female genital mutilation and the FGM resource pack particularly section 13.

## **Forced marriage**

Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some perpetrators use perceived cultural practices as a way to coerce a person into marriage. Schools and colleges can play an important role in safeguarding children from forced marriage.

The Forced Marriage Unit (FMU) has created: Multi-agency practice guidelines: handling cases of forced marriage (pages 32-36 of which focus on the role of schools and colleges) and, Multi-agency statutory guidance for dealing with forced marriage, which can both be found at <https://www.gov.uk/guidance/forced-marriage>  
College staff can contact the Forced Marriage Unit if they need advice or information: Contact number is 020 7008 0151 or email [fmu@fcdo.gov.uk](mailto:fmu@fcdo.gov.uk)

## **Preventing radicalisation**

Children are vulnerable to extremist ideology and radicalisation. Similar to protecting children from other forms of harms and abuse, protecting children from this risk should be a part of a schools' or colleges' safeguarding approach.

[Extremism](#) is the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces.

[Radicalisation](#) refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.

**Terrorism** is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

There is no single way of identifying whether a child is likely to be susceptible to an extremist ideology. Background factors combined with specific influences such as family and friends may contribute to a child's vulnerability. Similarly, radicalisation can occur through many different methods (such as social media or the internet) and settings (such as within the home).

However, it is possible to protect vulnerable people from extremist ideology and intervene to prevent those at risk of radicalisation being radicalised. As with other safeguarding risks, staff should be alert to changes in children's behaviour which could indicate that they may be in need of help or protection. Staff should use their judgement in identifying children who might be at risk of radicalisation and act

proportionately which may include the designated safeguarding lead (or deputy) making a Prevent referral.

The school's or college's designated safeguarding lead (and any deputies) should be aware of local procedures for making a Prevent referral.

### **The Prevent duty**

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

The Prevent duty should be seen as part of schools' and colleges' wider safeguarding obligations. Designated safeguarding leads and other senior leaders should familiarise themselves with the revised [Prevent duty guidance: for England and Wales](#), especially paragraphs 57-76 which are specifically concerned with schools (and also covers childcare).

Designated safeguarding leads and other senior leaders in colleges have familiarised themselves with the Prevent duty guidance: for further education institutions in England and Wales.

The guidance is set out in terms of four general themes: risk assessment, working in partnership, staff training, and IT policies.

### **Channel**

Channel is a voluntary, confidential support programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. Prevent referrals may be passed to a multi-agency Channel panel, which will discuss the individual referred to determine whether they are vulnerable to being drawn into terrorism and consider the appropriate support required. A representative from the school or college may be asked to attend the Channel panel to help with this assessment. An individual's engagement with the programme is entirely voluntary at all stages.

The designated safeguarding lead should consider if it would be appropriate to share any information with the new college in advance of a child or vulnerable adult leaving. For example, information that would allow the new college to continue supporting victims of abuse or those who are currently receiving support through the 'Channel' programme, and have that support in place for when the child or vulnerable adult arrives.

Guidance on Channel is available at: [Channel guidance](#).

### **Additional support**

The department has published advice for schools on the [Prevent duty](#). The advice is intended to complement the Prevent guidance and signposts other sources of advice and support.

The Home Office has developed three e-learning modules:

- [Prevent awareness e-learning](#) offers an introduction to the Prevent duty.
- [Prevent referrals e-learning](#) supports staff to make Prevent referrals that are robust, informed and with good intention.
- [Channel awareness e-learning](#) is aimed at staff who may be asked to contribute to or sit on a multi-agency Channel panel.

[Educate Against Hate](#), is a government website designed to support school teachers and leaders to help them safeguard their students from radicalisation and extremism. The platform provides free information and resources to help staff identify and address the risks as well as build resilience to radicalisation.

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

The ETF Online Learning environment provides online training modules for practitioners, leaders and managers, support staff and governors/Board members outlining their roles and responsibilities under the duty

### **Peer on peer**

Children and vulnerable adults can abuse other children and vulnerable adults (often referred to as peer on peer abuse) and it can take many forms. 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. This can include (but is not limited to): bullying (including cyberbullying, prejudice-based and discriminatory bullying); abuse within intimate partner relationships; physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm; sexual violence and sexual harassment; consensual and non-consensual sharing of nude and semi-nude images and/or videos; causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party; upskirting and initiation/hazing type violence and rituals. 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.

### **Sexual violence and sexual harassment between children in schools and colleges**

#### **Context**

Sexual violence and sexual harassment can occur between two children of any age and sex. It can also occur through a group of children or vulnerable adults sexually assaulting or sexually harassing a single person or group of children or vulnerable adults.

Children and vulnerable adults who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same college. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and face to face (both physically and verbally) and are never acceptable.

It is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe. 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. Staff should be aware that some groups are potentially more at risk. Evidence shows girls, children and adults with special educational needs and disabilities (SEND) and LGBT children are at greater risk.

Staff should be aware of the importance of:

- challenging inappropriate behaviours
- making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up
- not tolerating or dismissing sexual violence or sexual harassment as “banter”, “part of growing up”, “just having a laugh” or “boys being boys”; and,
- challenging physical behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them.

### **What is Sexual violence and sexual harassment?**

#### **Sexual violence**

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 and that it can happen both inside and outside of college. When referring to sexual violence we are referring to sexual violence offences under the Sexual Offences Act 2003 as described below:

**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. Staff within LINK19 College are aware that sexual assault covers a very wide range of behaviour so a single act of kissing someone without consent, or touching someone’s bottom/breasts/genitalia without consent, can still constitute sexual assault.

**Causing someone to engage in sexual activity without consent:** A person (A) commits an offence if: s/he intentionally causes another person (B) to engage in an activity, the activity is sexual, B does not consent to engaging in the activity, and A does not reasonably believe that B consents. (This could include forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.)

**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.

#### **Sexual harassment**

When referring to sexual harassment we mean ‘unwanted conduct of a sexual nature’ that can occur online and offline, including both inside and outside of college. When we reference sexual harassment, we do so in the context of child on child sexual harassment. Sexual harassment is likely to: violate a child’s dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment.

Further information about consent can be found at: Rape Crisis England & Wales - Sexual consent

- 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.

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 (staff at LINK19 will consider when any of this crosses a line into sexual violence - it is important to talk to and consider the experience of the victim) and displaying pictures, photos or drawings of a sexual nature; and
- online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence.

It may include:

- consensual and non-consensual sharing of nude and semi-nude images and/or videos. As set out in UKCIS Sharing nudes and semi-nudes: advice for education settings working with children and young people (which provides detailed advice for schools and colleges) taking and sharing nude photographs of U18s is a criminal offence;
- sharing of unwanted explicit content
- upskirting (is a criminal offence)
- sexualised online bullying
- unwanted sexual comments and messages, including, on social media
- sexual exploitation; coercion and threats.

### **Upskirting**

The Voyeurism (Offences) Act 2019, which is commonly known as the Upskirting Act, came into force on 12 April 2019. ‘Upskirting’ is where someone takes a picture under a person’s clothing (not necessarily a skirt) without their permission and or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is a criminal offence. Anyone of any sex, can be a victim.

### **The response to a report of sexual violence or sexual harassment**

The initial response to a report from a child or vulnerable adult is important. The staff at LINK19 college will respond to a report and encourage not to undermine the confidence of victims of sexual violence and sexual harassment to ensure that victims report to an appropriate adult. Schools and colleges not recognising, acknowledging or understanding the scale of harassment and abuse and/or downplaying of some behaviours can actually lead to a culture of unacceptable behaviour. It is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe. 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.

If staff have a concern about a child or a child makes a report to them, they should follow the referral process as set out in paragraph 55 in Part 1 of Keeping Children Safe in Education 2021. As is always the case, if staff are in any doubt as to what to do they should speak to the designated safeguarding lead or a deputy.

## **Work Placements**

No learners should go out on a placement if they will be working with a lone worker, for example a sole trader, family placement.

All learners, prior to attending a work placement/experience, should be advised of the college policy and procedures with regard to child /learner protection and safeguarding, in particular what to do if they have concerns regarding their wellbeing and safety whilst on work experience.

## Appendix 6: Keeping yourself safe when responding to disclosures (the 6 R's – what to do if...)

### 1. Receive

- Keep calm
- Listen to what is being said without displaying shock or disbelief
- Take what is being said to you seriously
- Note down what has been said

### 2. Respond

- Reassure the pupil/learner that they have done the right thing in talking to you
- Be honest and do not make promises you cannot keep e.g. “It will be alright now”
- **Do not promise confidentiality;** you have a duty to refer
- Reassure and alleviate guilt, if the pupil/learner refers to it e.g. “you’re not to blame”
- Reassure the learner that information will only be shared with those who need to know

### 3. React

- React to the pupil/learner only as far as is necessary for you to establish whether or not you need to refer the matter, but do not interrogate for full details
- **Do not** ask leading questions; “Did he/she....?” Such questions can invalidate evidence.
- **Do** ask open “TED” questions; Tell, explain, describe
- Do not criticise the perpetrator; the pupil/learner may have affection for him/her
- Do not ask the pupil/learner to repeat it all for another member of staff
- Explain what you have to do next and who you have to talk to

### 4. Record

- Make some brief notes at the time on any paper which comes to hand and write them up as soon as possible
- Do not destroy your original notes
- Record the date, time, place, any non-verbal behaviour and the words used by the learner. Always ensure that as far as possible you have recorded the actual words used by the learner.
- Record statements and observable things rather than your interpretations or assumptions

### 5. Remember

- Contact the designated safeguarding adult lead (DSAL)
- The DSAL may be required to make appropriate records available to other agencies
- KSCMP: [www.kscmp.org.uk](http://www.kscmp.org.uk) and KSMAB.

### 6. Relax

- Get some support for yourself, dealing with disclosures can be traumatic for professionals

## APPENDIX 7 Safeguarding incident / concern form



### SAFEGUARDING INCIDENT / CONCERN FORM

<b>COLLEGE / SCHOOL CONTACTS</b>	
<b>LINK19 College: 01322 629733</b> <b>College Mobile: 07939 165625</b>	<b>Ifield School: 01474 365485</b>
<b>Learner name:</b>	
<b>Name and role of person completing form (please print):</b>	
<b>Date of incident /concern:</b>	<b>Time of incident/concern:</b>
<b>Incident/concern (Verbatim recording and who, what, where, when):</b>	
<b>Any other relevant information (witnesses, immediate action taken):</b>	
<b>Action taken:</b>	
<b>Signature of person completing form:</b>	<b>Date form completed (DD/MM/YY):</b>
<b>DSAL or Deputy DSAL action (including reasons and outcomes):</b>	
<b>Signature of Deputy DSAL:</b>	<b>Date:</b>
<b>Signature of DSAL:</b>	<b>Date:</b>

CONFIDENTIAL

## BODY MAP

Child's name:

Date and Time observed:

Description of marks:

Signature:

