



Monoux Safeguarding Policy and Procedures 2022/23

Author

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Key Information

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Secondary Designated Safeguarding Lead	Jonathan Service
Named Person for Allegations against staff & volunteers	David Vasse or James Gould
MH/SEMH/Behaviour lead	Jonathan Service
SENDCo / Special Needs Lead	Jonathan Service
LAC / PLAC Lead	Jonathan Service
Headteacher / Principal	David Vasse
Chair of Governors / Trustees	Professor Colin Grant
Safeguarding Link Governor	Maurine Lewin

Revision	Notes
March 2018	To include Fitness to Study and Criminal Conviction processes Clarification on reporting concerns regarding members of staff
January 2019	To update Safeguarding Team, align with KCSIE 2018, revise referral mechanism for staff, revised FtS process and new procedure for parental contacts and for visitors
March 2020	Minor updates to Safeguarding Team and contact list. Update on page 14 regarding phones and social media.
June 2020	Changes to Safeguarding referral procedures (p10) to cover temporary safeguarding arrangements (currently due to covid-19), changes to special safeguarding arrangements due to covid-19 (page 20), clarification on training requirements for SLT and Governors. References to 2018 guidance removed. Further additional to guidance on viewing mobile phones in urgent Safeguarding situations (page 14).
July 2021	Updated policy in line with Keeping Young people Safe in Education (2021), including minor changes to understanding Part 1, staff and governors' duties, added section on sexual harassment and definition, renting premises, note on pre-16 Safeguarding, updated definition of domestic abuse. Removed 'helpful' numbers as kept up to date by Well-being team and via internet search when needed.
September 2022	Significant re-write to policy, using the Waltham Forest 2022/23 Model Safeguarding Policy and encompassing changes to Keeping Young people Safe in Education 2022. Update to Fitness to Study processes, GDPR, and roles of DSL to reflect current SLT structure.

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Purpose and Scope

Our commitment to Safeguarding

All young people have a right to be safe and should be protected from all forms of abuse and neglect.

Although reporting concerns can be uncomfortable for staff, and be unpleasant for families, at Monoux Sixth Form we recognize that it is better to help young people and their families early, before issues escalate and become more damaging.

Because safeguarding is everyone's responsibility, all staff are committed to recognizing and reporting all concerns relating to student safety, wellbeing and are vigilant to spot signs of abuse and maltreatment.

As such, we promise to:

- Be observant and alert to signs of abuse
- Be curious and question explanations given by parents / students / staff
- Be compassionate, honest, and clear
- Ask for support when we feel at the limit of our experience / skills
- Understand and follow these college policies and procedures
- Work together with other agencies when appropriate to make sure that support for students and families is effective and helps improve outcomes.

Young people learn and thrive best when they are healthy, safe, and secure, when their individual needs are met, and when they have positive relationships with the adults caring for them. Monoux Sixth Form offers an environment where young people feel welcome, safe, and free to enjoy learning and developing in confidence. The purpose of this policy is to safeguard and promote the welfare of young people at Monoux Sixth Form.

This policy is underpinned by the Department for Education (DfE) updated version of the statutory guidance Keeping Young people Safe in Education (KCSIE) 2022. It has been developed from the Waltham Forest Model Safeguarding Policy 2022/23, and amended to include key Monoux processes (such as our process for Fitness to Study). There is an expectation that staff have read and understood this policy, and KCSIE 2022.

Safeguarding and promoting the welfare of young people is defined for the purposes of this policy as:

- Protecting young people from maltreatment
- Preventing impairment of young people's mental and physical health or development
- Ensuring that young people grow up in circumstances consistent with the provision of safe and effective care
- Taking action to enable all young people to have the best outcomes.

To take all necessary steps to keep young people safe and well, **Monoux Sixth Form** will:

- Ensure our approach is centred on the young person, considering always what is in their best interest
- Safeguard young people both preventatively and responsively
- Ensure the suitability of adults who have contact with young people
- Promote good health, effective management of medical conditions, and the development of self-care in young people & young people
- Have clear standards of behaviour for staff / volunteers and young people / young people
- Manage behaviour by anticipating possible concerns, prevention strategies, and clear, fair responses to challenging behaviour
- Maintain records that document safeguarding concerns over time, including low-level worries about a child or young people that together may paint a picture of concern
- Ensure that all policies and procedures relating to safeguarding and wellbeing are updated annually in collaboration with the board of governors
- All students are empowered through the fostering of "positive behaviours" in the Portrait of a Monoux Graduate, as expressed, for example, through Induction, Entry Periods, Talent Lab, Assemblies, and the Monoux Passport to share concerns about themselves and their peers, with staff.
- Every opportunity is taken to represent and share our core values with students as expressed through the Portrait of a Monoux Graduate

Who is responsible for Safeguarding?

No single professional can have a full picture of a young person's needs and circumstances. This policy applies to all staff, including paid staff, volunteers and sessional workers, agency staff, organisations contracted to deliver services within Monoux Sixth Form, one-off visitors, students, or anyone working on behalf of Monoux Sixth Form. This policy relates to both children (anyone up to their 18th birthday), and vulnerable adults. In this policy, we use the term 'young people' or 'student' to refer both to children under the age of 18, and vulnerable adults.

This policy is readily available via our website for practitioners, parents and partners and is given to parents. Support and consideration will be given to those parents for whom English is not a first language.

The voice of the young person

All staff will ensure that their approach is young person and family centred. This means that they will consider what is in the best interests of the young person, and approach families with compassion and respect.

Staff will always seek to understand and give a voice to the lived experience of a given young person within Monoux Sixth Form, at home and within their wider community, even if young people are unable / unwilling to express their experience themselves (for example, if English is a barrier).

Safeguarding legislation and guidance

Section 175 of the [Education Act](#) 2002 requires local education authorities and the governors of maintained colleges and further education (FE) colleges to make arrangements to ensure that their functions are carried out with a view to safeguarding and promoting the welfare of young people.

The [Teachers' Standards](#) state that teachers, including headteachers, must have regard for the need to safeguard students' well-being, in accordance with statutory provisions; and uphold public trust in the teaching profession as part of their professional duties.

The statutory guidance [Working Together to Safeguard Children](#) 2018 covers the legislative requirements and expectations on individual services (including colleges) to safeguard and promote the welfare of young people. It also provides the framework for the three local safeguarding partners (the local authority; a clinical commissioning group for an area, any part of which falls within the local authority; and the chief officer of Police for a Police area, any part of which falls within the local authority area) to decide to work together to safeguard and promote the welfare of local young people including identifying and responding to their needs. The guidance confirms that it applies, in its entirety, to all colleges.

The statutory guidance [Keeping Children Safe in Education](#) 2022 is issued under Section 175 of the [Education Act](#) 2002, the [Education \(Independent College Standards\) Regulations](#) 2014 and the [Non-Maintained Special Colleges \(England\) Regulations](#) 2015.

[What to do if you're worried a child is being abused](#) 2015 - Advice for practitioners is non-statutory advice which helps practitioners to identify abuse and neglect and take appropriate action.

Post-16 education information has been included in KSCIE 2022 about the Education and Training (Welfare of Children) Act 2022, which extends safeguarding provisions to providers of post-16 education.

All staff are required to provide signed confirmation that they have read Part One of [Keeping Children Safe in Education](#) 2022, a copy of which will be kept in staff files.

Relevant staff should be aware of Part 4, Part 5, Annex B and Annex C and this policy through training and annual updates.

Key Safeguarding Roles & Responsibilities

Note – the phone numbers on these pages are not direct lines to individual members of staff but are numbers for the college helpdesk, which will direct your call.			
Designated Safeguarding Lead			
Name:	James Gould	Email:	James.gould@sgmc.ac.uk
Job Title:	Vice Principal, Student Services and Recruitment	Phone:	020 8523 3544
Second Designated Safeguarding Lead			
Name:	Jonathan Service	Email:	Jonathan.Service@sgmc.ac.uk
Job Title:	Assistant Principal – Interventions	Phone:	020 8523 3544
Principal – managing allegations against staff (this may be delegated to another member of SLT)			
Name:	David Vasse	Email:	David.Vasse@sgmc.ac.uk
Job Title:	Principal	Phone:	020 8523 3544
Chair of Governors – managing allegations against Headteacher			
Name:	Professor Colin Grant	Email:	c.grant@qmul.ac.uk
Job Title:	Chair of corporation	Phone:	020 8523 3544
Link Governor for Safeguarding			
Name:	Maurine Lewin	Email:	M.Lewin@sky.com
Job Title:	Link Governor for Safeguarding	Phone:	020 8523 3544
Designated Members of Staff for Safeguarding is used to describe members of staff who are trained to manage safeguarding disclosures (includes young people who are currently, or previously, looked after and SEND students who experience Safeguarding concerns)			
All members of the Personal Mentor team who have received DSL training. Personal mentors who have not received DSL training will receive appropriate supervision and direction in their work.			

Principal

Although the Safeguarding Team is responsible for day to day Safeguarding actions, the Principal is ultimately responsible for all young people in Monoux Sixth Form. The Principal should be made immediately aware immediately if harm (emotional, physical, sexual, neglect) to a young person has been caused by a member of staff or volunteer.

Leads by Setting Safeguarding Ethos

- Ensures that the Safeguarding policy and procedures are understood and implemented by all staff.
- Ensures that all staff feel able to raise concerns about poor or unsafe practice and that such concerns are handled sensitively and in accordance with the whistleblowing procedures.
- Ensures that the culture supports the provision of effective pastoral care and early help, and that staff do everything they can to support social workers when social care become involved.
- Ensures that students are always provided with opportunities throughout the curriculum to learn about safeguarding and how to keep themselves safe, including when online, as part of a broad and balanced curriculum.

Prioritises Safeguarding

- Allocates enough time, training, support, and resources, including cover arrangements, when necessary, to enable the Safeguarding Team to carry out their roles effectively, including the assessment of students and attendance at strategy discussions and other necessary meetings.
- Promotes the educational achievement of any students who may be in an especially vulnerable group.

Ensures Safer Recruitment and Allegations against Staff & Volunteers (ASV)

- Refers all allegations that a young person has been harmed by, or may be at risk of harm from, a member of staff (including agency staff, supply teachers and volunteers) to the Designated Officer for the Local Authority (LADO) within one working day prior to any internal investigation. This may be delegated to another member of the Senior Leadership Team.
- Ensures that anyone who has harmed or may pose a risk of harm to a young person is referred to the Disclosure and Barring Service, as advised by the LADO. This may be delegated to a member of the Senior Leadership Team.
- Ensures sufficient managers (or staff involved in interviews) are trained to undertake Safer Recruitment.
- Appoints a case officer who will be a member of the senior leadership team to investigate allegations concerning members of staff and volunteers and/or act as a point of contact for the member of staff/volunteer against whom the allegation is made.
- Ensures that DBS checks for volunteers are undertaken which will be free of charge whilst undertaking in-house checks.

Training requirements

To be familiar with national and local guidance and policy relating to Safeguarding and Prevent and associated issues.

Designated Safeguarding Leads (DSL)

There are two DSLs from the senior leadership team. During term time a DSL will always be available (during college hours) for staff to discuss any safeguarding concerns. Staff will be provided with advice, information and signposting out of hours and over weekends / college holidays in the event of an emergency.

The broad areas of responsibility for the DSLs are (detail is in Appendix 3):

- Management of referrals
- Advice, support, and expertise on safeguarding matters
- Management of safeguarding records, ensuring they contain a full and rich picture of young people's experience.
- Champion student wellbeing
- Primary point of contact for safeguarding
- Support and liaises with parents, carers, and families
- Coordinate safeguarding training and induction
- Ensure that Safer Recruitment / Management of Allegations against Staff & Volunteers procedures are implemented
- Liaise with the principal to ensure he/she is kept informed of issues, particularly child protection enquiries (S47 of the Children's Act 1989) and police investigations.
- Ensure that young people are being supported by an Appropriate Adult in accordance with the police and criminal evidence (PACE) act 1984.
- The DSL has responsibility for these Safeguarding Policy and Procedures and for reporting on Safeguarding to the Governing Body.

Training requirements

To be familiar with national and local guidance and policy relating to Safeguarding and Prevent and associated issues, and to attend Designated Safeguarding Officer training at least once every two years (changed from three years in 22/23). Engage in an appropriate programme of annual CPD to maintain expertise in Safeguarding and Prevent.

The Governing Body

Governors are kept informed of these responsibilities through a variety of mechanisms. These include considering the annual Safeguarding Policy (at Corporation), reviewing the annual Safeguarding Report (External Relations Committee) and via the audit function. Governors have responsibility to:

- Appoint a DSL who is a member of the senior leadership team and who has undertaken training in multi-agency working, in addition to child protection training. Governors will ensure that the designated safeguarding lead has the appropriate authority within the college/college to carry out the duties of the post. In addition to ensuring that the postholder is given the additional time, funding, resources, and support needed to carry out the role effectively.

- Ensure that the DSL role is explicit in the role holder's job description and that safeguarding responsibilities are identified explicitly in the job/role descriptions of every member of staff and volunteer.
- Ensures that a DSL is always available during college or college hours for staff to discuss any safeguarding concerns. In exceptional circumstances availability will be via telephone and/or Skype or other such media.
- Ensures that a DSL is always available at least via telephone or other media as above during any out of hours/out of term college activities.
- Agree a safeguarding policy and procedures, including a staff code of conduct, that are consistent with local safeguarding partnership and statutory requirements, reviewed annually and made available publicly.
- Agree procedures for dealing with allegations of abuse made against members of staff (including supply staff) and volunteers including allegations made against the Principal.
- Ensure the college follows safer recruitment procedures that include statutory checks on the suitability of staff to work with young people and disqualification from providing childcare regulations.
- Ensures an induction strategy that ensures all staff, including the Principal, and volunteers receive information about the college's safeguarding arrangements, Staff Code of Conduct and the role of the DSL on induction.
- Develops a training strategy that ensures all staff, including the Principal, and volunteers receive appropriate and regularly updated safeguarding training and updates as required (at least annually) to provide them with the relevant skills and knowledge to safeguard young people effectively. The training strategy will also ensure that the DSL receives refresher training and regular updates as defined under the DSL's duties above.
- Ensures that all staff, including temporary staff and volunteers, have read, and understood the college's young person protection and safeguarding policy and Staff Code of Conduct before they start work at the college.
- Ensures that appropriate staff are in place to promote the educational achievement of young people who are looked after by the Local Authority and who have left care through adoption, special guardianship, or young person arrangement orders or who were adopted from state care outside England and Wales.
- Ensure there are clear systems and processes in place for identifying possible mental health problems, including routes to escalate and clear referral and accountability systems.
- Ensures an effective pastoral care offer and Early Help offer.
- Ensures that young people are taught about how to identify risks, including online, and how to access support and help.
- Ensures that the voice and lived experiences of young people are heard and reflected in the life of Monoux Sixth Form
- The governing body is also responsible for overseeing Safeguarding Audits completed and returned to the Local Authority under s175 of the [Education Act 2002](#).
- Ensure relevant staff have due regard to the relevant data protection principles, which allow them to share (and withhold) personal information as provided for in the [Data Protection Act 2018](#) and [General Data Protection Regulations \(GDPR\)](#). This includes:

- Being confident of the processing conditions which allow them to store and share information for safeguarding purposes, including information which is sensitive and personal and should be treated as 'special category personal data'.
- For colleges, advice/guidance in respect of sharing 'special category personal data' where the serious harm test under the legislation is met, can be found on the [Disclosure and Barring](#) service website. Where in doubt independent legal advice should be sought.
- Understanding that safeguarding of young people and individuals at risk is a processing condition that allows practitioners to share special category personal data. This includes allowing practitioners to share information without consent where there is good reason to do so and that the sharing of information promotes effective and timely safeguarding of a young person. In circumstances where it has not been possible to gain consent, or where seeking consent would place a young person at risk, it is reasonable to act without consent to safeguard the young person or young person.

Training requirements

To be familiar with national and local guidance and policy relating to Safeguarding and Prevent and associated issues, and to attend Safeguarding and Prevent training at least once every two years (changed from three years in 22/23).

Chair of Governors

The governing body nominates a member (normally the chair) to be responsible for liaising with the Local Authority and other agencies in the event of an allegation being made against the Principal.

Link Governor for Safeguarding

The governing body also identifies a named governor to take leadership responsibility for the safeguarding arrangements (Link Governor for Safeguarding). That governor will maintain regular contact with the DSLs, meeting each half term, and will ensure that the governing body receives regular reports about safeguarding activity.

All college staff

All staff have a responsibility to provide a safe learning environment in which our students can learn. Any young person may benefit from early help and all staff members are aware of the local early help process and our role in it. They are aware of signs of abuse and neglect so they can identify young people who may need of help or protection.

All staff should be aware of the increased risk of abuse to certain groups, including young people with special educational needs and disabilities, looked after young people, previously looked after young people, young carers and risks associated with specific safeguarding issues including child sexual exploitation, child criminal exploitation, young person on young person abuse, sexual harassment and sexual violence/harm in college, extremism, female genital mutilation and forced marriage; and keeping young people safe online.

All staff have a duty to report all concerns regarding students directly to a member of the Safeguarding Team. All staff should be aware of how to make a referral to Social Care or Early Help if there is a need to do so. If staff have any concerns about a young person's welfare, they must act on them immediately and speak with a member of the Safeguarding Team – do not assume that others have acted.

- No one can guarantee confidentiality to a student and must make it clear that information will be shared if there are concerns about the welfare of a student, even if they do not consent to the sharing of information.
- Young people may disclose concerns to staff and may do so knowing that what they are disclosing is a concern. Sometimes they will be unaware that their disclosure will signal a concern. Staff should make the time and space to listen and understand what the young person is disclosing. Staff should not be afraid to respond to young people naturally and should respond with compassion and empathy.
- If disclosures are concerning but vague, a member of the safeguarding team may need to speak to the young person further to obtain enough information. In these circumstances, the practitioner should use open questions (including, questions starting with 'when', 'where', 'why', 'how', etc).
- Concerns should be logged by staff as soon as is practically possible by finding a member of the Safeguarding Team for a face-to-face discussion, by telephoning them or visiting Room 37. Ideally this would be the student's personal mentor, but any of the team can receive a referral for any student. The member of the Safeguarding Team may then ask the referring member of staff to write up the concern via email or insert a comment on Pro-Monitor. In non-urgent Safeguarding situations, teaching staff may also insert a Confidential Comment into Pro-Monitor.
- In emergency situations any member of staff should call 999 for emergency services. If you feel that a student should not leave site as they may be unsafe, take them directly to either Rm 37 or the Principalship and inform the Campus Officers.
- If the college is operating a significant percentage of its delivery online, staff will receive communication that an alternative referral mechanism for referrals will be in place. This will be regularly reviewed, and clearly communicated to staff. The most likely mechanism will be that:
 - If a student, parent, or staff member has a safeguarding concern they should email info@sgmc.ac.uk detailing the concern. If all delivery is occurring off-site (i.e. remotely and online), the SIC team will, in the first instance, call the Personal Mentor for that pathway to notify them of the concern and forward the email. If the Personal Mentor is unavailable they will call (in this order) – Vice Principal, Student Services, Assistant Principal – Interventions, other members of SLT.
 - If the college is operating a mixed model of remote/face to face delivery, a Safeguarding Officer or senior manager will be on site and a rota provided to SIC. A decision will be made by SLT and a clear message to staff detailing the referral mechanisms. This will either be the referral mechanism detailed

above (i.e. via SIC) or the standard referral mechanisms, depending on the level of online delivery and staff presence on site.

- If staff members have a Safeguarding Concern about another other staff member or volunteer, this must be reported to a member of Senior Leadership Team. If an allegation is made against you, you must also report it, even if you know it to be false. This can be via email, phone, or face to face. If staff members have a Safeguarding concern about a member of Senior Leadership Team, this should be reported to the Principal. If staff members have a Safeguarding Concern about the Principal, this should be reported to the Safeguarding Governor, or the Chair of Governors.
- Allegations made against College staff and volunteers will be dealt with according to the process laid out in 'Keeping Children Safe in Education (2022)'. The Principal or the Chair of the Governing body (if it is an allegation about the Principal) will work with the LADO to confirm the details of individual cases and to reach a decision on the way forward in each case. College staff will not investigate cases of suspected abuse themselves. The College will co-operate fully with the Police and Children's Social Care. The Principal may delegate authority for investigating and liaising with the LADO to another member of the senior leadership team.

Training requirements

New staff, volunteers, including supply staff, will receive a safeguarding induction including:

- the college's safeguarding policy and Part 1 of KCSIE
- the staff safeguarding code of conduct
- the identity and role of the Safeguarding Team

All staff will receive appropriate and regular updates on safeguarding, refresher training and thematic updates at least annually. Staff will also complete Prevent refresher training every two years. They must also read and understand Part 1 of Keeping Children Safe in Education.

Identifying Abuse

Being alert to abuse and to the fact that 'it could happen here' is crucial to safeguarding. Knowing what to look for is vital for the early identification of abuse and neglect. All staff are aware of the indicators of abuse and neglect so that they can identify cases of young people who may need help or protection.

An abused young person will often experience more than one type of abuse, as well as other difficulties. Young people can be at risk of abuse or exploitation in situations outside their families. Abuse reduces resilience in young people and puts them at further risk of abuse throughout their lives. Abuse and neglect can happen over a period but can also be a one-off event. Abuse and neglect can have major long-term impacts on all aspects of a young person's health, development, and well-being.

Monoux Sixth Form is aware of the signs of abuse and neglect so we can identify young people who may need help or protection. All staff are aware of environmental factors which

may impact on a young person's welfare and safety and understand safeguarding in the wider context (contextual safeguarding). Staff are aware of safeguarding issues that can put young people at risk of harm and understand that behaviours linked to issues such as drug taking, alcohol abuse, deliberately missing education and sexting put young people in danger.

Staff are aware that mental health problems can, in some cases, be an indicator that a young person 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. Staff are well placed to observe young people 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 young person that is also a safeguarding concern, immediate action should be taken by following the procedures in this policy.

Growing up with adverse childhood experiences (ACEs) such as abuse, neglect, community violence, homelessness, parental separation, bereavement or growing up in a household where adults are experiencing mental health issues or harmful alcohol or drug use, can lead to negative, lifelong emotional and physical outcomes. There is potential for (ACEs) to have a significantly harmful effect on the trajectory of a young person's life. The impact can affect their physical and mental health, self-worth, and ability to develop healthy relationships.

When the stress of these adverse experiences is so severe or prolonged that a young person is unable to process it, what should be a normal survival response becomes "toxic stress". This type of stress alters the functioning of the brain and has a long-lasting and injurious impact on the developing mind, which we call "trauma". This trauma affects the way those suffering it think and act throughout their lives. Understanding such mental and emotional trauma is key to understanding the behaviour of millions of people. Monoux Sixth Form works to raise awareness and impact across the college of adverse childhood experiences.

Types of Abuse

There are four main categories of abuse and neglect:

- physical abuse
- emotional abuse
- sexual abuse
- neglect

Young person on young person abuse

Our college may be the only stable, secure, and safe element in the lives of young people at risk of, or who have suffered harm. Nevertheless, whilst at college, their behaviour may be challenging and defiant, or they may instead be withdrawn, or display abusive behaviours towards other young people. Our college recognises that some young people may abuse their peers and any incidents of young person-on-young person abuse will be managed in

the same way as any other safeguarding concern and will follow the same procedures. We will seek advice and support from other agencies as appropriate.

Young person on young person abuse can manifest itself in many ways. This may include bullying (including cyber bullying), physical abuse or initiation / hazing type violence and rituals. We do not tolerate any harmful behaviour in college and will take swift action to intervene where this occurs. We use lessons and assemblies to help young people understand what abuse is, and we encourage them to tell a trusted adult if someone is behaving in a way that makes them feel uncomfortable. This includes highlighting the risks associated with sharing nude images.

Our college understands the different gender issues that can be prevalent when dealing with young person-on-young person abuse. We have a campaign and code of conduct to raise awareness of sexual violence/harm or harassment that takes place inside and outside of the college. This ensures that all disclosures are taken seriously and that students are given support, reassurance, and information about laws in place to protect them from sexual violence and sexual harassment. Where possible, support to the victim and any disciplinary action will be maintained at the same time as appropriate and on a case-by-case basis. This will be determined by risk assessment, liaison with external agencies if required, the family and with consideration of the victim's needs.

Serious Violence

All staff are aware of indicators which may signal those young people who are at risk from or 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 well-being, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that a young person has been approached by, or is involved with, individuals associated with criminal networks or gangs.

Young people with Special Educational Needs and Disabilities, physical or mental health difficulties

Our college understands that young people with special educational needs (SEN) and disabilities can face additional safeguarding challenges. Barriers can exist when recognising abuse and neglect in this group of young people. This can include:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the young person's disability, without further exploration
- That they may be more prone to peer group isolation than others
- The potential to be disproportionately impacted by things like bullying, without outwardly showing signs
- Communication difficulties in overcoming these barriers

Young people missing from education

All young people, regardless of their age, ability, aptitude, and any special education needs they may have, are entitled to a full-time education. Our college recognises that a young person missing education is a potential indicator of abuse or neglect and will follow the college procedures for unauthorised absence. It is also recognised that, when not in college, young people may be vulnerable to or exposed to other risks, so we work with parents and other partners to keep young people in college whenever possible. Where absence is not

explained, further investigation could follow. This could involve parent/carer meetings, disciplinary processes, or Fitness to Study (covered below). Parents are requested to provide at least two emergency contact numbers.

Contextual Safeguarding

Safeguarding incidents and behaviours can be associated with factors outside our college. All staff are aware of contextual safeguarding and the fact they should consider whether wider environmental factors present in a young person's life are a threat to their safety and/or welfare. To this end, we will consider relevant information when assessing any risk to a young person and share it with other agencies to support better understanding of a young person and their family.

One contextual safeguarding factor is the risk to our students around gangs and youth violence. This requires the college to focus resources on campus security staff, CCTV, paying particular attention to periods of the day where students are leaving campus. In situations where there deemed to be a risk of an urgent Safeguarding incident where there is an imminent risk of harm towards other students, senior managers may request students to show their mobile phones and recent social media exchanges to prevent further escalation or criminal activity.

There should be at least two staff members present for this, and the student should be clear on the reasons why this request has been made. The phone should be flat on the table so that everyone can view the images. A commentary to the student should be given why a certain message has been chosen to view. The member of staff should be sensitive to the risk of observing any indecent images, and should take care to listen to the student or not proceed to open messages that are clearly of a private nature. A summary of the content that has been viewed should be included as a confidential comment on Pro-Monitor with all members of staff who have viewed the device confirming this is an accurate record.

Child Sexual Exploitation (CSE) is a form of young person abuse, which can happen to any young person or young person of any gender and from any background or community. In Waltham Forest, the definition of Child Sexual Exploitation (CSE) from the Department of Education (DfE, 2017) has been adopted:

"Child Sexual Exploitation is a form of sexual abuse. It occurs when an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a young person or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology".

It is understood that a significant number of young people who are victims of CSE go missing from home, care, and education at some point. Our college is alert to the signs and indicators of a young person becoming at risk of, or subject to, CSE and will take appropriate action to respond to any concerns.

Child Criminal Exploitation is a geographically widespread form of harm which is a typical feature of county lines criminal activity (county lines is when drug networks or gangs groom and exploit young people to carry drugs and money from urban areas to suburban areas and seaside towns). Where necessary, we work with key partners locally to prevent and respond to young person criminal exploitation.

Domestic Abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. Young people can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn.

Female Genital Mutilation (FGM) comprises all procedures involving partial or total removal of the external female genitalia or other injury to female genital organs. It is illegal in the UK and a form of young person abuse. As of October 2015, the Serious Crime Act 2015 (Home Office, 2015) introduced a duty on teachers (and other professionals) to notify the police of known cases of female genital mutilation where it appears to have been carried out on a girl under the age of 18. Our college will operate in accordance with the statutory requirements relating to this issue, and in line with local safeguarding procedures.

Forced Marriage is one entered without the full consent of one or both parties. It is where violence, threats or other forms of coercion is used and is a crime. Our staff understand how to report concerns where this may be an issue in accordance with the latest government guidance - <https://www.gov.uk/government/publications/the-right-to-choose-government-guidance-on-forced-marriage>

Prevention of Radicalisation

As of July 2015, the [Counter-Terrorism and Security Act \(HMG, 2015\)](#) placed a new duty on colleges and other education providers. Under section 26 of the Act, colleges are required, 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. It requires colleges to:

- teach a broad and balanced curriculum which promotes spiritual, moral, cultural, mental, and physical development of students and prepares them for the opportunities, responsibilities and experiences of life and must promote community cohesion
- be safe spaces in which young people / young people can understand and discuss sensitive topics, including terrorism and the extremist ideas that are part of terrorist ideology, and learn how to challenge these ideas
- be mindful of their existing duties to forbid political indoctrination and secure a balanced presentation of political issues

CHANNEL is a national programme which focuses on providing support at an early stage to people identified as vulnerable to being drawn into terrorism. Our college works in accordance with local procedures for PREVENT and with other agencies, sharing information and concerns as appropriate.

Helping young people to recognise risk and access support

A key mechanism for keeping young people safe in education is ensuring that they are given an understanding of how to recognise risk and where to go for help when they need it. Giving young people an understanding of what is and is not appropriate in professional conduct and in their home/care can improve identification of concerns and reporting about themselves and their peers. College staff can enhance this further by building trusting relationships with young people, using professional curiosity, and speaking to a member of the Safeguarding Team about any concerns for a student.

Students who identify as LGBTQ+ or are assumed to be LGBTQ+ are likely to be more vulnerable to abuse. LGBTQ+ inclusion is promoted within the curriculum, through events during the year and the promotion of an LGBTQ+ student group.

Monoux Sixth Form encourages a range of ways for young people to report concerns. We use the slogan 'Feel Unsafe? Tell any member of staff. They will know what to do.' Opportunities throughout the day, such as Entry Periods at the start of the day, enable young people to report concerns and staff to notice students who might be exhibiting uncharacteristic behaviours.

[Keeping Children Safe in Education](#) 2022 requires governing bodies and proprietors to ensure that young people are taught about safeguarding, including online safety, as part of providing a 'broad and balanced curriculum.'

Young people are taught to understand and manage risk through our assembly programme, curriculum and through all aspects of college life. Our approach is designed to help young people to think about risks they may encounter and with the support of staff work out how those risks might be reduced or managed. Young people are also reminded regularly about online safety, the risks of sharing content and images online and tackling bullying, including cyber bullying procedures. The college continually promotes an ethos of respect for young people and students are encouraged to speak to a member of staff of their choosing about any worries they may have. We provide relationships education as part of our assembly programme, and through our campaign to raise awareness of healthy relationships and sexual harassment.

Especially vulnerable students

To ensure that all our students receive equal protection we will give special consideration to young people who are particularly vulnerable.

Young People Especially Vulnerable:

- Mental health concerns
- Young carers
- Transgender young people
- Affected by parental substance misuse, domestic violence or parental mental health needs
- Asylum seekers
- Living away from home
- Vulnerable to being bullied, or engaging in bullying
- Living in temporary accommodation
- Live transient lifestyles
- Living in chaotic and unsupportive home situations
- Vulnerable to discrimination on the grounds of race, ethnicity, religion, disability, or sexuality
- At risk of sexual exploitation
- Do not have English as a first language
- At risk of female genital mutilation (FGM)
- At risk of forced marriage
- At risk of being drawn into extremism.

This list provides examples of additional vulnerable groups and is not exhaustive.

Young people who need a social worker (Child in Need and Child Protection Plans)

Young people may need a social worker due to safeguarding or welfare needs. A young person's experiences of adversity and trauma can leave them vulnerable to further harm, as well as educationally disadvantaged in facing barriers to attendance, learning, behaviour, and mental health.

Local authorities should share the fact a young person has a social worker, and the DSL should hold and use this information so that decisions can be made in the best interests of the young person's safety, welfare, and educational outcomes, which should be considered as a matter of routine. There are clear powers to share this information under existing duties on both local authorities and colleges and colleges to safeguard and promote the welfare of young people. Where young people need a social worker, this should inform decisions in relation to safeguarding and promoting welfare (i.e., responding to unauthorised absences or missing education episodes and the provision for pastoral and/or academic support).

Young people requiring mental health support

We have an important role to play in supporting the mental health and wellbeing of our students. Mental health problems can, in some cases, be an indicator that a young person has suffered or is at risk of suffering abuse, neglect or exploitation.

All staff should also be aware that mental health problems can, in some cases, be an indicator that a young person has suffered or is at risk of suffering abuse, neglect or

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

Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff, however, are well placed to observe young people 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.

Immediate action should be taken in response to any mental health concerns about a young person. Action will also be taken where there is a safeguarding concern already present, through reporting as with any other safeguarding concern. The DSL will establish whether a referral is required (in consultation with external agencies if required), or the situation should be managed by discussion with parents/carers and possibly the offer of early help.

Advice to help identify young people in need of extra mental health support, this includes working with external agencies can be found in the [mental health and behaviour in colleges guidance](#).

Public Health England has produced a range of resources to support secondary college teachers to promote positive health, wellbeing and resilience among young people including its guidance [Promoting children and young people's emotional health and wellbeing](#). Its resources include social media, forming positive relationships, smoking and alcohol. See [Rise Above](#) for links to all materials and lesson plans.

Information sharing

The [Data Protection Act](#) 2018. The Data Protection Act 2018 controls how personal information is used by organisations, businesses or the government and is the UK's implementation of the General Data Protection Regulation (GDPR).

The DPA (2018) **does not prevent the sharing of information for the purposes of keeping young people safe**. Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare and protect the safety of Young people. See [Data protection: a toolkit for colleges](#) 2018, guidance developed to support colleges with data protection activity, including compliance with GDPR.

When deciding whether information needs to be shared with practitioners within the setting or with other agencies, practitioners should take account of the following principles, bearing in mind that the most important consideration is whether sharing information is likely to support the safeguarding and protection of a young person:

- Necessary & Proportionate
- Relevant
- Adequate
- Accurate
- Timely
- Secure

- Recorded
- Lawful
- Fair
- Transparent

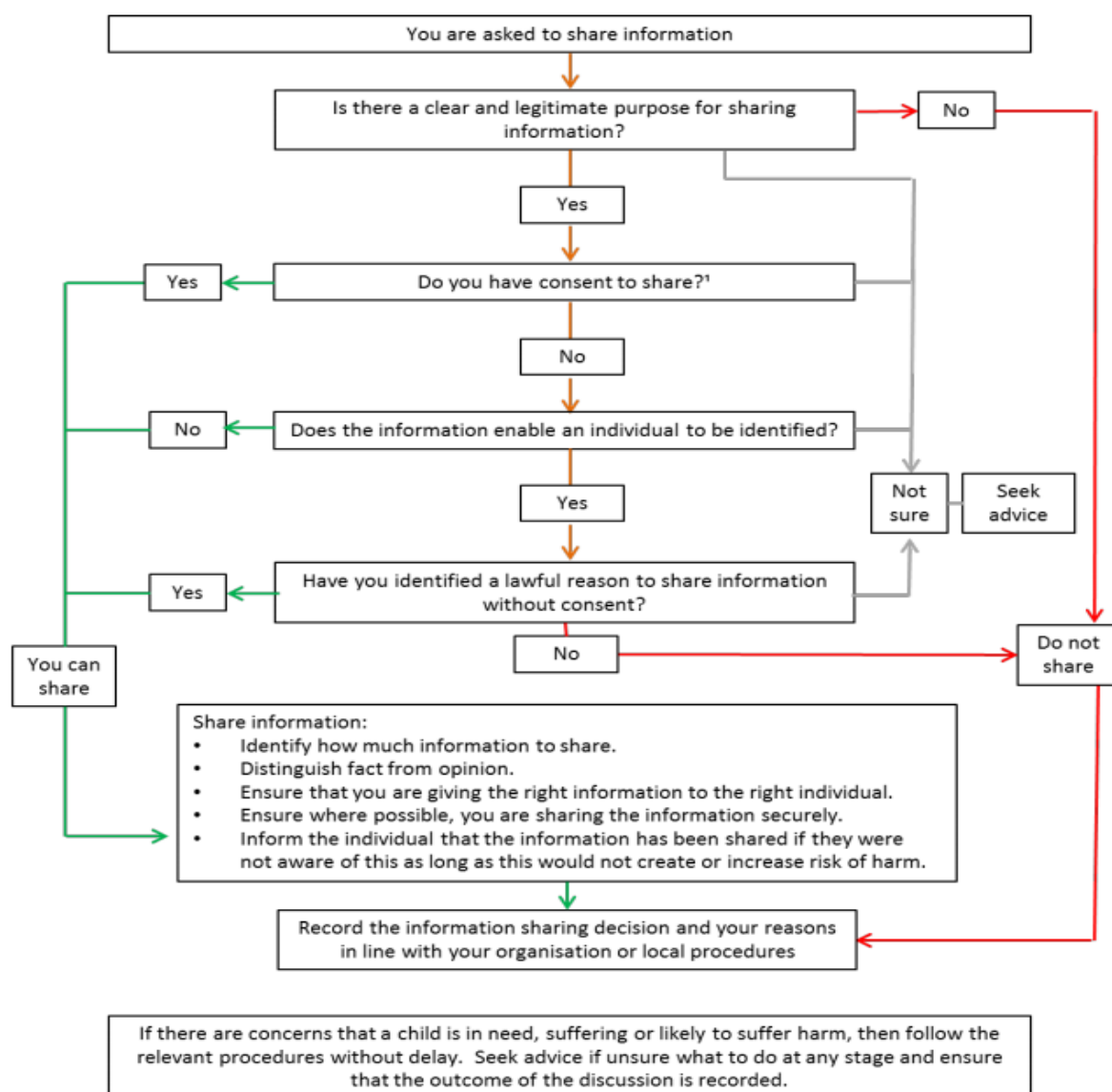
Practitioners should consider when they share information, how and how much they share, and where possible they should be transparent about the fact that they're sharing. It is important to acknowledge that sharing of all information that could be regarded big or small is essential for the protection of the young person.

Although the process for deciding whether to share information is the same within and outside the setting, in terms of proportionality and the need to know, sharing information with practitioners from other agencies (even if based in college / college) needs to be documented. It is reasonable for staff to discuss day-to-day concerns about students with colleagues to ensure that young people's general needs are met in college. However, staff should report all young person protection and safeguarding concerns using the guidance above. The person receiving the referral will then decide who else needs to have the information and they will disseminate it on a 'need-to-know' basis.

The Safeguarding Officer will normally obtain consent from the student and/or parents to share sensitive information within the college or with outside agencies. Where there is good reason to do so, the Safeguarding Officer may share information *without* consent (where the sharing of information will not expose the data subject to data privacy risks), and will record the reason for not obtaining consent. If any member of staff receives a request from a student or parent to see young person protection records, they will refer the request to the data protection officer (DPO) for further consideration.

Every effort will be made to prevent unauthorised access to sensitive information. Portable devices such as mobile phones, laptop computers, tablets or on portable media will be fully encrypted with two-stage authentication.

Flowchart of when and how to share information for Safeguarding practitioners when sharing information with external agencies following a disclosure



If in doubt about sharing, see: [Information sharing: Advice for practitioners providing safeguarding services to Young people, young people, parents and carers](#) 2018.

Transitions

All colleges are responsible for ensuring appropriate transitions from one setting to another. This includes preparing young people and welcoming them appropriately and sharing the full pastoral and safeguarding context of a young person, required for the new setting to understand behaviours within a full context of experiences by the young person – this would also include tried and tested strategies.

We endeavour to meet every new young person prior to induction to discuss any welfare needs they have, and request our feeder schools to transfer safeguarding files. The young person's safeguarding file should be transmitted and received electronically. Otherwise, PDF versions can be sent by secure email or by recorded delivery to the named DSL in the new setting.

Recording

Recording of concerns should take place as close in time to the incident as reasonably possible, by using Pro-Monitor confidential comments.

Decision-Making

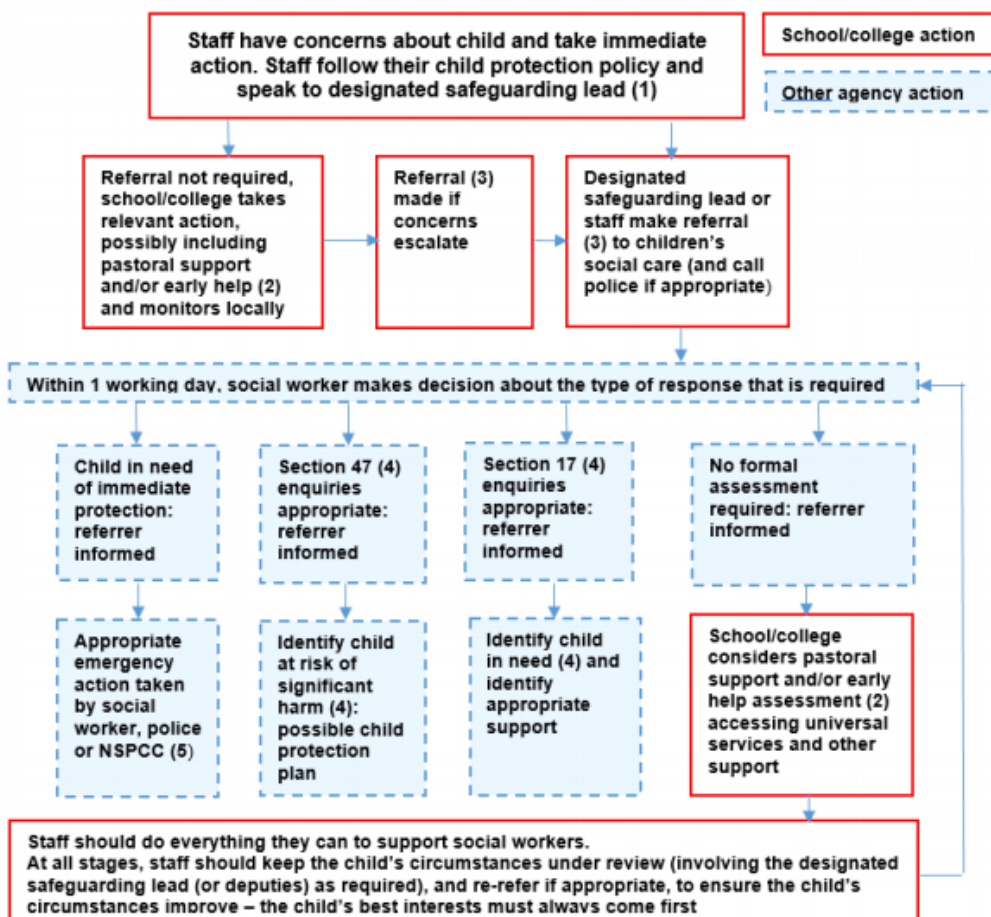
Once concerns are identified and shared with a member of the Safeguarding Team, involved staff will decide together how best to proceed to support the young person and to mitigate the risk. DSLs can consult with MASH at any point.

Options for action include:

Pastoral Care	Keeping Children Safe in Education 2022 acknowledges the casework that colleges undertake on a pastoral level. This includes managing any support for the young person internally via the college's own pastoral support processes. If pastoral staff are engaged, they must work alongside safeguarding staff, and DSLs would take the lead on decisions about progressing a case.
Early Help (MASH)	Colleges can refer young people and families for early help assessment and support, with the informed consent of parents.
Referral to statutory services (MASH)	A referral must be made to MASH/Children's Social Care (and if appropriate the police) immediately if the young person is: <ul style="list-style-type: none">• A young person in need; defined under the Childrens Act 1989 as a young person who is unlikely to achieve or maintain a reasonable level of health or development, or whose health and development is likely to be significantly or further impaired, without the provision of services; or a young person who is disabled• Suffering, or likely suffering, harm.
Allegation of harm to a young person by a practitioner	If the alleged harm to a young person is caused by a practitioner or a volunteer, the headteacher should be notified immediately and LADO should be consulted.

Other external agencies for referrals include CAMHS, adult social care or the Police. Following a number of cases nationally where senior leaders in colleges failed to act upon concerns raised by staff, [Keeping Children Safe in Education](#) 2022 emphasises that any member of staff must contact and/or make a referral to Children’s Social Care if they are concerned about a young person, if their DSL does not share their views.

Actions where there are concerns about a child



- (1) In cases which also involve a concern or an allegation of abuse against a staff member the LADO must be informed.
- (2) Early help means providing support as soon as a problem emerges at any point in a young person’s life. Where a young person would benefit from co-ordinated early help, an early help inter-agency assessment should be arranged. Chapter one of Working Together to Safeguard Children provides detailed guidance on the early help process.
- (3) Referrals should follow the process set out in the local threshold document and local protocol for assessment. Chapter one of Working Together to Safeguard Children.
- (4) Under the Childrens Act 1989, local authorities are required to provide services for young people in need for the purposes of safeguarding and promoting their welfare. Young people in need may be assessed under section 17 of the Childrens Act 1989. Under section 47 of the Childrens Act 1989, where a local authority has reasonable cause to suspect that a young

person is suffering or likely to suffer significant harm, it has a duty to make enquiries to decide whether to take action to safeguard or promote the young person's welfare. Full details are in Chapter one of Working Together to Safeguard Children.

(5) This could include applying for an Emergency Protection Order (EPO).

Referrals

[Multi-agency Safeguarding Hub \(MASH\)](#) is Waltham Forest's single point of referral to social care for concerns regarding young people and vulnerable adults. The college also keeps up to date with other Local Authority procedures where our students reside in a different borough.

Referrals to the MASH should be made immediately when there is a concern that the young person is suffering significant harm or is likely to do so. It is good practice to notify MASH by phone and/or email to discuss the situation prior to sending a written referral. This will help determine the level of intervention and will also give social care and the police time to decide to come and see the young person that same day in college, if deemed necessary.

A DSL ordinarily takes responsibility for the referral process, in consultation with staff who know the young person. The completion of a referral may be delegated to a Designated Member of Staff for Safeguarding, but a DSL must be kept informed of progress.

There are circumstances where another member of staff must refer without delay:

- If for some reason (e.g., during the summer break), the DSL is not available, the referral should be made without delay by any other member of college staff
- If you disagree with your DSL's decision not to refer a case to MASH, it is your responsibility to refer the case, and to respectfully inform the DSL that you are doing so.

Should another member of staff refer instead, the DSL must be consulted and updated as soon as possible.

Notifying parents

The college will normally seek to discuss any concerns about a student with their parents. This must be handled sensitively, and a DSL will make usually contact with the parent in the event of a concern, suspicion, or disclosure. Our focus is the safety and wellbeing of the student. Therefore, if the college believes that notifying parents could increase the risk to the young person or exacerbate the problem, advice will be sought first from Social Care.

Home visits

Occasionally, it might be required for a member of staff to visit a student's house. This might be for a welfare concern or due to a personal tutoring arrangements. On these occasions, a risk assessment should be conducted and signed off by a member of SLT. For welfare visits, two members of staff should attend. For personal tutoring, a full risk assessment should be carried out of the accommodation to ensure that it is suitable for both safety and safeguarding reasons. Considerations should include whether the tuition can take place in a communal area of the house, and whether there are any pets.

Holding young people in college after a referral to MASH

Sometimes MASH social workers and police will want to see a young person on the day of referral to ensure that they are safe to go home. In such cases, they will ask to keep the young person in college until the visit has taken place. This is because it can take time to organise the visit with an available social worker and/or police officer, sometimes families will be asked to wait at college before a young person is released to them, and they may be asked not to see their young person during this time. This can be stressful and uncomfortable for both colleges and families and sometimes all are kept at college until late in the evening. College should prepare families for the length of time this process can take and treat them with compassion and understanding and make every attempt to facilitate this difficult process.

We do not have powers to prevent a young person from leaving their college when a parent arrives. As such, if a parent refuses to comply with the request for their young person to remain in college until a professional can speak to them, we will inform the parent that they will be alerting emergency services, and then inform the social worker and police immediately.

Support for students, families, and staff

Abuse is devastating and traumatic for young people. Even those parents who hurt their young people will be distressed. It can also result in secondary trauma in those staff who are involved in these cases.

We will support students, their families, and staff by:

- Taking all concerns and disclosures seriously
- Nominating a link person who will keep all parties informed
- Appointing a separate link person where the DSL is the subject of an allegation
- Prioritising mental health and resilience, and accepting that everyone can have a bad day
- Responding sympathetically to any request from students or staff for time out to deal with distress
- Maintaining confidentiality and sharing information on a need-to-know basis only with relevant individuals and agencies
- Storing records securely
- Signposting to helplines, counselling, or other avenues of external support
- Following procedures in safeguarding, whistleblowing, complaints, and disciplinary procedures
- Co-operating fully with relevant statutory agencies.

Practitioners' Code of Conduct

Practitioners are in a position of trust and authority and have a duty of care towards the young people and young people we work with. This policy should be read alongside the Safeguarding Code of Conduct, which is found on the staff dashboard.

Allegations against staff and volunteers (ASV)

To manage allegations against professionals, every Local Authority appoints a Designated Officer (LADO). The LADO should be alerted to all cases in which it is alleged that a person who works with young people has:

- Behaved in a way that has harmed a young person, or may have harmed a young person
- Possibly committed a criminal offence against or related to a young person
- Behaved towards a young person or young people in a way that indicates they may pose a risk of harm to young people
- Behaved or may have behaved in a way that indicates they may not be suitable to work with young people

The term “professional” in this context includes paid employees, volunteers, casual/agency staff, and self-employed workers who will have contact with young people as a part of their role. The LADO ensures that all allegations or concerns about professionals or adults working or volunteering with young people are recorded appropriately, monitored, and progressed in a timely and confidential way. The LADO is involved from the initial phase of the allegation through to the conclusion of the case. The LADO provides advice and guidance to employers and voluntary organisations, liaising with the police and other agencies and monitoring the progress of cases to ensure that they are dealt with as quickly as possible, consistent with a thorough and fair process.

The LADO is available for consultation via email lado@walthamforest.gov.uk or by telephone discussion 0208 496 3646 for anyone who has a concern that a person who works or volunteers in a capacity that brings them into contact with Young people in Waltham Forest, may pose a safeguarding risk. Any allegations or concerns MUST be reported to the LADO within 24 hours (or one working day) of it coming to notice.

Low level concerns should always be undertaken in consultation with the LADO in congruence with local procedures and guidance. The consultation process allows for concerns to be evaluated objectively and to ascertain whether similar concerns may have been raised by a previous employer but not met the threshold for investigation. Whilst the LADO will only record those allegations which appear to meet the threshold for consideration within these procedures, the employer should record any concern that arises in respect of a member of their staff, volunteers, and contractors. All such concerns will be promptly shared with the principal, who may wish to consult a DSL to consider the most appropriate response. Employers of supply staff or contractors must also be notified to ensure any emerging patterns can be identified. Consultation with the LADO should be undertaken to verify whether a perceived low-level concern meets the harm threshold.

In normal circumstances the LADO will be contacted by the Principal, or a delegated member of the senior leadership team. It is important to note that anyone can contact the LADO if they are concerned about a person’s conduct with young people. In Waltham Forest the LADO will accept a referral from any person who wishes to report a concern that meets the criteria above.

If there are any concerns that a member of staff (including supply teachers) or volunteer has caused harm (emotional, physical, sexual, neglect) to a young person, this represents an

allegation against staff and volunteers. All allegations against staff (including supply teachers) and volunteers must be reported to a member of the senior leadership team in the first instance. The person against whom the allegation is made should not be notified at this point.

If the allegation is against the Principal, the concerns must be reported to the chair of governors or the LADO (lado@walthamforest.gov.uk or 0208 496 3646). Alternatively, staff can call the NSPCC whistleblowing helpline on 0800 028 0285 (line is available from 8:00 AM to 8:00 PM, Monday to Friday) or email: help@nspcc.org.uk.

You should:

- report it to a member of the senior leadership team within your organisation as soon as possible, however trivial it may seem.
- maintain confidentiality and guard against publicity while an allegation is being considered or investigated and follow local information sharing protocols

You should not:

- attempt to deal with the situation yourself.
- make assumptions, offer alternative explanations, or diminish the seriousness of the behaviour or alleged incidents.
- keep the information to yourself or promise confidentiality.
- take any action that might undermine any future investigation or disciplinary procedure, such as interviewing the alleged victim or potential witnesses, or informing the alleged perpetrator or parents or carers.

The full procedures for dealing with allegations against staff can be found in Part 4 of [Keeping Young people Safe in Education](#) 2022, and Part 7 of the London Child Protection Procedures.

Whistleblowing

The college's Whistleblowing policy enables staff to raise concerns or allegations, initially in confidence, and for a sensitive enquiry to take place. Whistleblowing is 'making a disclosure in the public interest' and occurs when a worker (or member of the wider college community) raises a concern about danger or illegality that affects others.

All staff are made aware of the duty to raise concerns about the attitude or actions of staff in line with the college's Whistleblowing policy. Staff are expected to report all concerns about poor practice or possible young person abuse by colleagues - including what may seem minor contraventions of the college's staff code of conduct – to a member of the senior leadership team; to facilitate proactive and early intervention to maintain appropriate boundaries and a safe culture that protects young people and reduce the risk of serious abuse in college.

Complaints procedure

The Monoux Sixth Form complaints procedure will be followed where a student or parent raises a concern about poor practice towards a student that does not reach the threshold for young person protection / LADO action.

Poor practice examples include unfairly singling out a student or attempting to humiliate them, bullying, or belittling a student or discriminating against them in some way. Complaints are managed by the Principal, or an allocated member of the senior leadership team.

An explanation of the complaint's procedure is included on the college website. Complaints from staff are dealt with under the college's complaints and disciplinary and grievance procedures. Complaints which escalate into a young person protection concern / LADO referral will automatically be managed under these procedures in college.

Maintaining a Safe Site

Visitors & Site security

All students and staff should be able to feel safe when they are on the college site. Students will always wear their ID and will not be allowed to enter the site without it.

Visitors will be asked to show their ID where appropriate (for example OFSTED and other professionals who are visiting the site), to sign in and out, and to always wear a visitor's badge. No visitor will be admitted to the college unless they are accompanied by a member of college staff.

Staff who sign visitors into the college should be responsible for escorting them around the site and ensuring they are not left unaccompanied with students. The exception to this is qualified professionals such as social workers, counsellors. Should the college have concerns about the identity of a qualified professional, they should speak to the service manager and request an email confirmation. Having sight of a DBS certificate is not enough reason for allowing a visitor full, unsupervised access and students – this must be done in conjunction with other reasonable checks and vetting. All visitors should be directed to use staff toilets or the Disabled toilet near reception.

Contractors

Regular contractors who work on site will be DBS checked as part of the service level agreement between them. The Safeguarding Policy and Procedures should be set out prior to work commencing. They will be expected to read and adhere to the College's Safeguarding Code of Conduct.

Occasional contractors who have not undergone DBS checks will always be supervised while they are on site.

Behaviour Management

Our behaviour policy is set out in a separate document and is reviewed regularly by the governing body. It is shared with all staff before they start working with young people as part of their induction. The policy is transparent to staff, parents, and students.

Use of reasonable force

All staff should be familiar with the statutory guidance for colleges on [The Use of Force in Colleges](#) 2015. When working with Young people with SEND, staff should have a full working knowledge of [Reducing the Need for Restraint and Physical Intervention with Children with SEND](#) 2019. [Keeping Children Safe in Education](#) 2022 highlights that there are circumstances when it is appropriate for staff in colleges and colleges to use reasonable force to safeguard young people.

This can range from guiding a young person to safety by the arm, to more extreme circumstances such as breaking up a fight or where a young person needs to be restrained to prevent violence or injury. 'Reasonable' in these circumstances means 'using no more force than is needed'. The use of force may involve either passive physical contact, such as standing between students or blocking a student's path, or active physical contact such as leading a student by the arm out of the classroom.

Staff should deploy every possible strategy to prevent the need for physical intervention. Those strategies would include de-escalation whenever there is a threat of violence or aggression towards an individual or property; communicating calmly with young people; using non-threatening verbal and body language; helping young people to recognise their own 'triggers' and 'early warning signs' and distracting or helping young people to see a positive way out of a difficult situation.

However, the college supports staff to intervene physically and to use reasonable force when all those strategies are unsuccessful in calming a situation and a risk of violence, serious damage to property or disruption to the college remains. Staff should always be able to demonstrate that any such intervention is reasonable, proportionate, and necessary in the circumstances, is used for the shortest possible period, deploys the minimum force that is necessary and is never used as a sanction.

Students with Criminal Convictions

Students may apply to the College who have criminal convictions. The following procedure will be followed to determine whether or not a place can be offered at the college.

Low level offences	Interview and risk assessment completed with any member of SLT
Medium level offences	Interview and risk assessment completed by a DSL
High Level Offences	Panel interview and risk assessment completed with a DSL and one other member of SLT

A list of low, medium, or high-level offences can be found in Appendix 8. This is not meant to be an exhaustive list and any queries should be referred to a DSL. Notes from these meetings should be kept under 'Confidential Comments' on Pro-Monitor. The risk assessment found in Appendix 9 can be used, or alternatively a narrative confidential comment on Pro-Monitor. A list of students with criminal convictions and whether their application was accepted or rejected will be kept securely by Admissions.

If students receive a conviction whilst at college, this process will be followed to decide whether they can continue their studies. The College reserves the right to suspend a student for a reasonable period to allow the Safeguarding Team to complete this process. It is considered a breach of conduct for students not to disclose convictions on application, or if they receive one whilst a student at SGMC.

Fitness to Study

Students with mental and physical health conditions are entitled to reasonable adjustments and appropriate support. However, in a small number of cases, students may become unfit to study when they have significant physical health or emotional well-being concerns which lead to a period of poor attendance or conduct.

At application, enrolment, or during study, a relevant staff member may raise concerns that a student may require adjustments to be fit to study, or not be fit to study at all. The College reserves the right to suspend an existing student for a reasonable period to allow for exploration of a particular case.

There are adjustments that can be considered for students as part of the Fitness to Study process. These may include a temporary break in learning, deferred enrolment, phased returns, mentoring, counselling, or remote completion of assignments. This is not an exhaustive list. Equally, many of these options may not be possible and are dependent on the circumstances of the case, course requirements and the need to maintain the effective education of other students.

The Fitness to Study process can be chosen as an alternative to the Disciplinary Policy and Procedures on discretion of the Pathway Leader or member of the Senior Leadership Team if there is clear evidence that the student has a genuine need. The Disciplinary Policy should be followed if the students fail to supply necessary documentation, or if their conduct (e.g., unauthorised absence) is not explained by their physical health or emotional well-being concern. Students and their parent/carers who are part of the Fitness to Study process have a responsibility to attend Fitness to Study meetings and fulfil responsibilities they have agreed to. If the Fitness to Study policy is the most appropriate route, the process below should be followed.

Risk level	Process
<p>Stage 1. Low Risk - concern emerges about a student's well-being or health but no immediate crisis. Examples may include:</p> <ul style="list-style-type: none"> - Recurrence of a back complaint which causes pain in dance classes. 	<p>Meeting with Personal Mentor, student, and parent/carer to put in place adjustments and support.</p> <p>Appropriate targets set.</p>

<ul style="list-style-type: none"> - A period of depression that has led to poor attendance and focus over the previous two weeks - Social anxiety that has led to some low-level interaction concerns in class 	<p>Meeting logged on Pro-Monitor</p>
<p>Stage 2. Medium Risk</p> <p>Significant concern regarding student's well-being or health but no immediate crisis. Examples may include:</p> <ul style="list-style-type: none"> - A health condition where certain practical tasks would be dangerous. - A diagnosis of epilepsy where the student is prone to regular fits - A long period of depression that has led to poor attendance and focus over a month - Significant behaviour concerns caused by social anxiety - A recent risk of self-harm 	<p>Meeting with Senior Mentor or member of SLT, student, and parent/carer to put in place adjustments and support.</p> <p>Appropriate targets set and risk assessment completed and logged on Pro-Monitor.</p>
<p>High Risk</p> <p>Serious or persistent concern about a student's health, well-being, or safety. Examples may include:</p> <ul style="list-style-type: none"> - A significant and imminent risk of suicide - A period of depression where attendance has been poor over a half-term - An acute health condition that limits physical movement or ability to attend and/or complete the course. 	<p>Meeting with member of SLT, mentor, student, and parent/carer to decide whether student is fit to continue their course with adjustments in place.</p> <p>If so, appropriate targets should be set, and a risk assessment completed and logged on Pro-Monitor.</p> <p>If the student is not fit to continue their course even with adjustments in place, a withdrawal decision should be made.</p>

Students can only be withdrawn due to Fitness to Study by a member of SLT and have the right of appeal within 10 days. Students withdrawn due to Fitness to Study are welcome to re-apply to the college at a later stage, receive a positive reference (if appropriate) which states withdrawn due to fitness to study, and maintain access to the college site for a period (for example, access to Teams meetings with a mentor or an on-site or meeting with a Careers Advisors).

Searching Young people

In accordance with DfE guidance [Searching, screening and confiscation - Advice for headteachers, college staff and governing bodies](#), college staff can search a student for any item if the student agrees. Students agree to be searched when they enrol to the college as part of their learner agreement. The college also has a policy to undertake random searching as part of its commitment to the wider contextual safeguarding concerns around youth violence and criminality.

The Principal and any member of staff authorised by the Principal also has a statutory power to search students or their possessions, where they have reasonable grounds for suspecting that the student may have one or more of the following prohibited items in their possession:

- knives or weapons
- alcohol
- illegal drugs
- stolen items
- tobacco and cigarette papers
- fireworks
- pornographic images
- indecent images of Young people
- any article that a member of staff reasonably suspects has been, or is likely to be, used to commit an offence, or to cause personal injury to, or damage to the property of, any person (including the student).

The Principal and authorised staff can also search for any item banned by the college rules which has been identified in the rules as an item which may be searched for. When designating a member of staff to undertake searches under these powers, the Principal should consider whether the member of staff requires any additional training to enable them to carry out their responsibilities.

College staff can confiscate any prohibited item found because of a search. They can also confiscate any item they consider harmful or detrimental to college discipline.

Searching staff must be the same gender as the student being searched; and there must be a witness (also a staff member) and, if possible, they should be the same sex as the student being searched. There is a limited exception to this rule. You can carry out a search of a student of the opposite sex to you and / or without a witness present, but only where you reasonably believe that there is a risk that serious harm will be caused to a person if you do not conduct the search immediately and where it is not reasonably practicable to summon another member of staff.

What the law says:

- The person conducting the search may not require the student to remove any clothing other than outer clothing.
- 'Outer clothing' means clothing that is not worn next to the skin or immediately over a garment that is being worn as underwear, but 'outer clothing' includes hats; shoes; boots; gloves and scarves. Headscarves or other garments worn for religious or cultural purposes are not considered outer clothing.
- 'Possessions' means any goods over which the student has or appears to have control – this includes desks, lockers and bags.
- A student's possessions can only be searched in the presence of the student and another member of staff, except where there is a risk that serious harm will be caused to a person if the search is not conducted immediately and where it is not reasonably practicable to summon another member of staff.
- The power to search without consent enables a personal search, involving removal of outer clothing and searching of pockets; but not an intimate search going further than that, which only a person with more extensive powers (e.g. a police officer) can do.

- The DSL must be aware of the requirement for young people to have an Appropriate Adult where an intimate search is being considered/conducted by police. Further information in respect of the role and duties of an appropriate adult can be found in the Statutory guidance - <https://www.gov.uk/government/publications/pace-code-c-2019/pace-code-c-2019-accessible>

Extended college and off-site arrangements

All extended and off-site activities are subject to a risk assessment to satisfy health and safety and safeguarding requirements. When our students attend off-site activities, including day and residential visits and work-related activities, we will check that effective young person protection, Health & safety, and whistleblowing arrangements are in place.

Where extended college activities are provided by and managed by the college, this Safeguarding policy and procedures will apply. If another body provide services or activities on the college site, college should seek assurance that the provider's young person protection policy and procedures are robust and sufficient. Appropriate arrangements should be in place to liaise should there be any young person protection concerns raised.

Safeguarding of students on Work Experience

As a college organising work experience placements, the Careers and Employability Team ensure that policies and procedures are in place to protect students from harm.

- Prior to a student undertaking work experience, a health and safety check and risk assessment will be carried out. Consideration will be given to cases when the person providing the supervision will be unsupervised.
- If the activity undertaken by the student on work experience takes place in a 'specified place', such as a college or nursery, and gives the opportunity for contact with young people, this may itself be regulated activity. In these cases, and where the student is 16 years of age or over, the work experience provider should consider whether a DBS enhanced check should be requested for the student in question. In such cases, the College will ensure that the DBS check is undertaken. DBS checks cannot be requested for young people/young people under the age of 16.
- Employers will be issued with an 'Employers' Guide to Work Experience' so they are aware of their responsibilities in relation to Safeguarding/PREVENT and the protection of young people and adults at risk.
- Should a safeguarding issue be raised before, during or after the placement this should be reported to the Safeguarding Team.

Alternative provision for Year 11 students

Where the college engages in the delivery of alternative provision for Year 11 students, this Safeguarding policy will apply. In addition, a risk assessment specific to the provision will be developed and monitored.

Intimate Care and Toileting of Disabled Students

Monoux Sixth Form College is committed to supporting and meeting the needs of students with disabilities and will ensure that no student is put at a substantial disadvantage compared with her or his non-disabled peers.

If a student has needs which require intimate care or the administration of medication, a meeting will be held with the student, their parents, carers, and relevant health professionals to ensure that an individual support plan is drawn up to meet those needs appropriately. The student's wishes and feelings will be considered and respected throughout this process.

Photography and images

To protect students, we will:

- Seek their consent for photographs or video images to be taken, including consent for the reasons for which photos will be used and how long they will be kept as per Data Protection legislation.
- Seek parental consent for the same if the student is under 18.
- Ensure students are appropriately dressed
- Encourage students to tell us if they are worried about any photographs/images that are taken of them.

Furthermore, when using images for publicity purposes (e.g., on our website or in newspapers or publications), we will:

- Avoid naming young people in full when possible
- If it is necessary to name young people, use first names rather than surnames
- If young people are named in full, avoid using their image
- Establish whether the image will be retained for further use, where and for how long
- Ensure that images are stored securely and used only by those authorised to do so.

For the protection of students and staff, only college owned equipment will be used to record, and store images taken by staff or volunteers on the college site or during offsite college activities including residential visits.

Parents are welcome to take photographs of their own young people only during college activities, subject to other restrictions notified to parents in advance in writing or verbally (e.g., parents may be asked not to take photographs during concerts/performances in order not to distract young people who are performing or other audience members). Parents must not publish (including on social media) photographs of other young people inadvertently captured during college events without the express permission of the parents of those young people.

Parents are welcome to video record their own young people only during college activities, subject to the same terms and conditions as for photographs above.

There may be occasions when parents are requested not to take photographs where a young person is subject to social care procedures or who requires protection of their identity

and whereabouts. They will not be singled out; in this instance, a blanket ban will be imposed.

Visiting practitioners who work directly with young people are subject to the same restrictions as college staff and volunteers in respect of recording and storing images of young people. However, some visiting professionals are permitted to record images of the premises only specifically for professional purposes only and in order to support the college, e.g. professionals providing advice or preparing quotations for work such as maintenance, health and safety and building.

Online Safety

Young people commonly use electronic equipment including mobile phones, tablets, and computers daily to access the internet and share content and images via social networking sites such as Facebook, Twitter, MSN, Tumblr, Snapchat, Tik Tok and Instagram. Those technologies and the internet are a source of fun, entertainment, communication, and education. Unfortunately, however, some adults and young people will use those technologies to harm young people and the use of technology has become a significant component of many safeguarding issues. Child sexual exploitation; radicalisation; sexual predation: technology often provides the platform that facilitates harm.

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

- content: being exposed to illegal, inappropriate, or harmful material; for example, pornography, fake news, racist or radical and extremist views.
- contact: being subjected to harmful online interaction with other users; for example, commercial advertising as well as adults posing as Young people 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.
- commerce: risks such as online gambling, inappropriate advertising, phishing and or financial scams. If you feel your students, students or staff are at risk, please report it to the Anti-Phishing Working Group (<https://apwg.org/>).

Chatrooms and social networking sites are the more obvious sources of inappropriate and harmful behaviour and students are not allowed to access those sites in college. Many students own or have access to handheld devices and parents are encouraged to consider measures to keep their young people safe when using the internet and social media at home and in the community. The college has an online safety policy which all students sign at enrolment.

The college's online safety policy explains how we try to keep students safe in college and protect and educate students in the safe use of technology. The college has appropriate filters and an external monitoring system in place to protect young people from potentially harmful online material and to flag if students view, or type, material of a concerning nature. This is reviewed annually as part of the Safeguarding report,

Cyberbullying and sexting by students will be treated as seriously as any other type of bullying and will be managed through our anti-bullying procedures (see 'Sexting' below). Serious incidents may be managed in line with our child protection procedures or Disciplinary Policy and Procedures.

All staff receive online safety training and are trained to be vigilant about and to report any concerns about risk to young people online in the same way that they notice and report offline concerns.

Staff should be prepared to respond to online challenges and online hoaxes and can refer to this useful guidance for help and support

<https://www.gov.uk/government/publications/harmful-online-challenges-and-online-hoaxes/harmful-online-challenges-and-online-hoaxes>

Online communication between staff and students

Staff must be aware of the acceptable use policy, and this should give advice regarding personal online activity, use of social networking and electronic communication. Under no circumstances is it acceptable for staff to communicate via personal devices / social media with students. Further detail on this can be found in the Staff Safeguarding Code of Conduct. Staff found to be in breach of these rules may be the subject of a referral to the Designated Officer in the Local Authority and/or may be subject to disciplinary action. All relevant staff have been given information about the provisions in place and know how to identify concerns and escalate matters to the senior leadership team.

Appendix 1

Specific Safeguarding Concerns

Physical Abuse

Physical abuse is deliberately physically hurting a young person. It might take a variety of different forms, including hitting, pinching, shaking, throwing, poisoning, burning, or scalding, drowning, or suffocating a young person. Physical abuse can happen in any family, but young people may be more at risk if their parents have problems with drugs, alcohol, and mental health or if they live in a home where domestic abuse happens. Disabled young people also have a higher risk of suffering physical abuse, and physical abuse in young people is more likely to lead to permanent injury or fatality.

Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a young person. Physical abuse can also occur outside of the family environment.

Emotional Abuse

Emotional abuse is the persistent emotional maltreatment of a young person. It is also sometimes called psychological abuse and it can have severe and persistent adverse effects on a young person's emotional development. Although the effects of emotional abuse might take a long time to be recognisable, practitioners will be able to observe it, for example, in the way that a parent interacts with their young person.

Emotional abuse may involve deliberately telling a young person that they are worthless, or unloved and inadequate. It may include not giving the young person 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 young people. These may include interactions that are beyond a young person's developmental capability as well as overprotection and limitation of exploration and learning or preventing the young person from participating in normal social interaction.

It may involve seeing or hearing the ill-treatment of another, which includes coercive control and domestic abuse. It may also involve serious bullying (including cyberbullying), causing young people frequently to feel frightened or in danger, or the exploitation or corruption of young people. Some level of emotional abuse is involved in all types of maltreatment of a young person, although it may occur alone.

Sexual Abuse & Exploitation

You should be aware that many young people who are victims of sexual abuse do not recognise themselves as such. A young person may not understand what is happening and may not even understand that it is wrong.

Sexual abuse can have a long-term impact on mental health. Sexual abuse may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside clothing. It may include non-contact activities, such as involving young people in the production of sexual images, forcing young people to look at sexual images or watch sexual activities, encouraging young people to behave in sexually inappropriate ways or grooming a young person in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males; women and young people are also perpetrators.

Child sexual exploitation is a form of sexual abuse where young people are sexually exploited for money, power, or status. It can involve violent, humiliating and degrading sexual assaults. In some cases, young people are persuaded or forced into exchanging sexual activity for money, drugs, gifts, affection, or status. Consent cannot be given, even where a young person may believe they are voluntarily engaging in sexual activity with the person who is exploiting them. Child sexual exploitation doesn't always involve physical contact and can happen online. A significant number of young people who are victims of sexual exploitation go missing from home, care, and education at some point.

Resources are available from the Centre of Expertise on Child Sexual Abuse - <https://www.csacentre.org.uk/knowledge-in-practice/practice-improvement/supporting-practice-in-tackling-young-person-sexual-abuse/>

Neglect

Neglect is a pattern of failing to provide for a young person's basic needs, whether it be adequate food, clothing, hygiene, supervision, or shelter. It is likely to result in the serious impairment of a young person's health or development. Young people who are neglected often also suffer from other types of abuse. Neglect usually indicates a relationship issue between the parent and young person.

A key task for staff and volunteers is to record all instances of neglect, however minor. This builds up a picture of the young person's lived experience and provides the crucial evidence required at point of referral. There are many different aspects in which neglect can manifest:

- Physical Neglect or Deprivation of Needs
- Medical Neglect
- Supervisory Neglect
- Environmental Neglect
- Educational Neglect
- Emotional Neglect

Domestic Abuse

Waltham Forest has adopted the Safe & Together model of working with young people affected by domestic abuse. This includes working in partnership with the abused parent and holding the perpetrating parent to account. Domestic abuse is defined as any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence, or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass, but is not limited to:

- psychological

- physical
- sexual
- financial
- emotional abuse

All young people 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 a serious, long lasting emotional and psychological impact on young people. In some cases, a young person may blame themselves for the abuse or may have had to leave the family home as a result. Domestic abuse affecting young people can also occur within their personal relationships, as well as in the context of their home life.

All concerns about young people being affected by domestic abuse will be reported to the DSL as with any other safeguarding concern. The DSL will respond to the report by consulting Children's Social Care to establish whether a referral is required, or the situation should be managed by discussion with parents/carers and possibly the offer of early help.

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.

Additional advice on identifying young people 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](#)
- Safe Lives which can be found here: safelives.org.uk/

[Young people who are looked after or were previously looked after](#)

Young people who were previously looked after, such as those adopted or under Special Guardianship Orders, potentially remain vulnerable. The college ensures that staff have the necessary skills and understanding to keep young people who are looked after and young people who were previously looked after safe and ensures that appropriate staff have information about a young person's looked after status and care arrangements, including the level of authority delegated to the carer by the authority looking after the young person.

Pro-Monitor holds details of the social workers for all young people who are looked after or were previously looked after; and the name and contact details of the Local Authority's virtual school head for young people who are looked after. The virtual school head works in partnership to ensure that student premium plus funding is appropriately used to promote the needs and educational achievement of looked after children or formerly looked after young people. The virtual school head also has strategic oversight of the educational attendance, attainment and progress of all young people who have an allocated social worker.

[Care Experienced young People](#)

Local authorities have ongoing responsibilities to young people who cease to be looked after and become care leavers. That includes keeping in touch with them, preparing an assessment of their needs and appointing a Personal Advisor who develops a pathway plan with the young person. This plan describes how the local authority will support the care

leaver to participate in education or training. The DSL will have details of the local authority Leaving Care Coach appointed to guide and support all care leavers; and should liaise with them as necessary regarding any issues of concern affecting an experienced young person.

Young people with Special Educational Needs and Disability (SEND)

Young people with special educational needs (SEN) and/or disabilities can face additional safeguarding challenges. Additional barriers can exist when recognising abuse and neglect in this group of young people, which can include:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the young person's disability without further exploration;
- The potential for young people with SEN and disabilities being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs; and
- Communication barriers and difficulties in overcoming these barriers.

Staff are trained to manage these additional barriers to ensure this group of young people are appropriately safeguarded. Staff can recognise the additional risks that young people with SEND face online, for example from online bullying, grooming and radicalisation and are confident they have the capacity to support SEND young people to stay safe online.

Contextual safeguarding

Contextual safeguarding means that assessments of young people should consider whether wider environmental factors which are present in a young person's life that are a threat to their safety and/or welfare. Staff will listen to young people and be vigilant about any signs or indicators that would suggest young people may be at risk in the community and will share intelligence with the Police to prevent young people suffering harm. The college will provide as much information as possible when asked to do so as part of a police investigation and/or when making referrals to Social Care.

Child Criminal Exploitation (CCE)

Waltham Forest has taken a public health approach to young people and young people's criminal exploitation by organized criminal groups (OCGs) and gangs.

CCE occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a young person into sexual and/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.
- through violence or the threat of violence

The victim may have been criminally exploited even if young person does not view themselves as a victim. CCE does not always involve physical contact; they can also occur using technology.

CCE can include young people being forced to work in cannabis factories, being coerced into moving drugs or money across the country (see section below on County Lines), forced to shoplift or pickpocket or to threaten other young people. Victims of CCE can be of any gender. Young people are often unwittingly drawn into criminal exploitation through the offer of friendship, relationships and care, gifts, drugs, alcohol, money, and accommodation. Some of the following can be indicators of CCE.

- Young people who appear with unexplained gifts or new possessions

- Young people who associate with other young people involved in exploitation
- Young people who suffer from changes in emotional well-being
- Young people who misuse drugs and alcohol
- Young people who go missing for periods of time or regularly come home late
- Young people who regularly miss college or education or do not take part in education.

Child Sexual Exploitation (CSE)

CSE occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a young person or young person under the age of 18 into sexual activity:

- in exchange for something the victim needs or wants, and/or
- for the financial advantage or increased status of the perpetrator or facilitator.

The victim may have been sexually exploited even if the sexual activity appears consensual.

CSE does not always involve physical contact; they can also occur using technology.

Victims of CSE can be of any gender, under the age of 18, including 16 and 17 years old who can legally consent to have sex. It can include both contact and non-contact sexually activity and may occur without the young person or young person's immediate knowledge.

Some of the indicators of CCE can also be indicators of CSE, as can:

- Young people who have older boyfriends/girlfriends
- Young people who suffer from sexually transmitted infections or become pregnant

Sexual exploitation is a serious crime and can have a long-lasting adverse impact on a young person's physical and emotional health. It may also be linked to other criminal activity including trafficking and illegal drugs. Drug networks or gangs groom and exploit young people to carry drugs and money from urban areas to suburban and rural areas, market, and seaside towns. The Department for Education have produced: [Child sexual exploitation: definition and guide for practitioners](#)

County Lines

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one or more importing areas [within the UK], using dedicated mobile phone lines or other form of "deal line". Exploitation is an integral part of the county lines offending model with Young people and vulnerable adults exploited to move [and store] drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence/harm) and weapons to ensure compliance of victims.

Young people can be targeted and recruited into county lines in several locations including colleges, further and higher educational institutions, student referral units, special educational needs colleges, young people's homes, and care homes. Young people are often recruited to move drugs and money between locations and are known to be exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection. Young people can easily become trapped by this type of exploitation as county lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

One of the ways of identifying potential involvement in county lines are missing episodes (both from home and college), when the victim may have been trafficked for the purpose of transporting drugs and a referral to the [National Referral Mechanism](#) should be considered.

All concerns about young people suspected to be at risk of or involved in county lines will be reported to the DSL as with any other safeguarding concern. The DSL will respond to the report by consulting Social Care to establish whether a referral is required. The Home Office published guidance:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/863323/HOCountyLinesGuidance_-_Sept2018.pdf

Serious violence

All staff are made aware of indicators that young people are at risk from or are involved with serious violent crime; and are trained to record and report any concern about young people at risk of or involved in perpetrating serious violence as with any other safeguarding concern.

Indicators may include increased absence, 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 could also indicate that young people have been approached by or are involved with individuals associated with criminal gangs.

Mental Health

All staff should also be aware that mental health problems can, in some cases, be an indicator that a young person 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. Staff, however, are well placed to observe young people 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 young people have suffered abuse and neglect, or other potentially traumatic adverse young personhood experiences, this can have a lasting impact throughout young personhood, adolescence and into adulthood. It is key that staff are aware of how these young people's experiences, can impact on their mental health, behaviour, and education. Immediate action should be taken in response to any mental health concerns about a young person that is also a safeguarding concern, through reporting the concern to the DSL as with any other safeguarding concern. The DSL will respond to the report by consulting Social Care to establish whether a referral is required, or the situation should be managed by discussion with parents/carers and possibly the offer of early help.

Advice and guidance on [Preventing and Tackling Bullying](#), and [Mental Health and Behaviour in Colleges](#) (which may also be useful for colleges) has been published. In addition, Public Health England has produced a range of resources to support secondary college teachers to promote positive health, wellbeing and resilience among young people including its guidance [Promoting children and young people's emotional health and wellbeing](#). Its resources include social media, forming positive relationships, smoking and alcohol. See [Rise Above](#) for links to all materials and lesson plans.

Young people with family a member in prison

Young people who have a family member in prison should be supported appropriately. Approximately 200,000 young people have a parent sent to prison each year. These young people are at risk of poor outcomes including poverty, stigma, isolation, and poor mental health. We seek to support students/students in this position through pastoral care, early help and discussions with parents/carers and other family members as appropriate.

For more information, see: www.prisonersfamilies.org/ The Prisoners' Families Helpline is 0808 808 2003.

Young people Missing from Education

Full attendance is important to the wellbeing of all students and enables them to access the opportunities made available to them at college. Non-attendance is also an indicator in all forms of abuse. The attendance policy is set out in a separate document and is reviewed regularly by the governing body. The college operates in accordance with statutory guidance [Children Missing Education \(DfE 2016\)](#). All young people, regardless of their circumstances, are entitled to an efficient, full-time education which is suitable to their age, ability, aptitude and any special educational needs they may have.

A young person going missing from education is a potential indicator of abuse and neglect, including sexual abuse or exploitation, young person criminal exploitation, radicalisation, or mental health problems. Staff will also be alert to signs of young people at risk of travelling to conflict zones, female genital mutilation and forced marriage.

Effective information sharing between parents, colleges and local authorities is critical to ensuring that all young people of compulsory college age are safe and receiving suitable education. Attendance, absence, and exclusions are closely monitored, and same day checks are undertaken on the first morning of absences.

The DSL will monitor unauthorised absence and take appropriate action including notifying the local authority, particularly where young people go missing repeatedly and/or are missing for periods during the college day. If this relates to a Year 11 student at the college, BACME will be contacted.

A conversation should take place with the Home Education Lead in the local authority BACME service if DSL has concerns about students in Year 11 whose parents wish to elect to home educate. See the Attendance / Young people Missing from Education policy.

Young people who run away or go missing from home or care

We recognise that young people who run away or go missing (particularly repeatedly) and are thus absent from their normal residence are potentially vulnerable to abuse and neglect, which may include sexual abuse or exploitation and young person criminal exploitation. It could also indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation or risk of forced marriage.

[Keeping Children Safe in Education](#) 2022 highlights that [Statutory Guidance on Children who Run Away or go Missing from Home or Care](#) 2014 requires that every young person who runs away or goes missing must be offered a Return Home Interview (RHI) within a period of 72 hours of their return. RHIs are intended to ascertain the factors that triggered the young person's absence. Those factors may include difficulties at home, in college and in the community. The short timescale of 72 hours is imposed to ensure that the RHI remains relevant to the young person and enables any required action to be initiated at the earliest opportunity. RHIs are undertaken by practitioners who are independent to facilitate a discussion with the young person that is as open as possible. As soon as the Local Authority receives notification that a young person has gone missing from home or care, a letter will be sent to parents/carers seeking their consent to an RHI with their son/daughter. Direct contact will then be made with parents/carers and the young person to plan for the interview. To fulfil the timescale of within 72 hours, it is essential that all opportunities to interview young people including times during the college/college day are utilised.

Female Genital Mutilation (FGM)

Female genital mutilation (FGM) is the collective name given to a range of procedures involving the partial or total removal of the external female genitalia for non-medical reasons or other injury to the female genital organs. It has no health benefits and harms girls and women in many ways. The practice, which is most carried out without anaesthetic, can cause intense pain and distress and long-term health consequences, including difficulties in young person birth and risks to the unborn young person. FGM is carried out on girls of any age, from new-born to older teenagers and adult women, so college staff are trained to be aware of risk indicators. Many such procedures are carried out abroad and staff should be particularly alert to suspicions or concerns expressed by female students about going on a long holiday during the summer vacation period.

The practice is illegal under the [Female Genital Mutilation Act](#) 2003. Any person found guilty of an offence under the [Female Genital Mutilation Act](#) 2003 is liable to a maximum penalty of 14 years imprisonment or a fine, or both.

Teachers are subject to a statutory duty defined by Section 5B of the [Female Genital Mutilation Act](#) 2003 (as inserted by section 74 of the [Serious Crime Act](#) 2015) to report to the Police personally where they discover (e.g., by means of a disclosure) that an act of FGM appears to have been carried out on a girl who is aged under 18. This is known as mandatory reporting. Teachers in that situation will record their concerns and inform the DSL, who will support the teacher in making a direct report to the Police.

Forced Marriage

A forced marriage is a marriage in which a female (and sometimes a male) does not consent to the marriage but is coerced into it. Coercion may include physical, psychological, financial, sexual, and emotional pressure. It may also involve physical or sexual violence/harm and abuse. A forced marriage is not the same as an arranged marriage. In an arranged marriage, which is common in several cultures, the families of both spouses take a leading role in arranging the marriage but the choice of whether to accept the arrangement remains with the prospective spouses. Guidance created by the Forced Marriage Unit should be

reviewed for further information - [The right to choose: government guidance on forced marriage - GOV.UK \(www.gov.uk\)](#)

Young people may be married at a very young age, and well below the age of consent in England. College staff should be particularly alert to suspicions or concerns raised by a student about being taken abroad and not being allowed to return to England. Since June 2014 forcing someone to marry has become a criminal offence in England and Wales under the [Anti-Social Behaviour, Crime and Policing Act](#) 2014.

Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a young person's welfare. The DSL (and any deputies) refer any concerns 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, this does not replace a referral into Children's Social Care where a young person has been harmed or is at risk of harm.

Prevent: Protecting Young people from Radicalisation & Extremism

All colleges 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](#).

Some young people are vulnerable to extremist ideology and radicalisation. Protecting young people from the risk of radicalisation is part of the college's wider safeguarding duties and is similar in nature to protecting Young people from other forms of harm and abuse. As such, the DSL is responsible for the college's strategy for protecting young people from those risks.

Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups. Extremism is the vocal or active opposition to fundamental values, including 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. 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.

As young people get older, they look for adventure and excitement and they may start to ask questions about their identity and belonging. During that stage of their development, they are vulnerable to extremist groups that may claim to offer answers, identity and a social network apparently providing a sense of belonging. Many of those extremist groups make sophisticated use of the internet and social media to target and groom young people. Young people who feel isolated or disaffected in some ways are particularly vulnerable to radicalisation as they are other forms of abuse and exploitation.

The college has defined responsibilities to ensure that young people are safe from terrorist and extremist material when accessing the internet in college. During the process of radicalisation, it is possible to intervene to prevent vulnerable people being radicalised. The college is committed to preventing students from being radicalised and drawn into any form of extremism or terrorism. The college promotes the values of democracy, the rule of law, individual liberty, mutual respect and tolerance of those with different faiths and beliefs by providing students with opportunities through the curriculum to discuss issues of religion, ethnicity and culture and learn how to discuss and debate points of view; and by ensuring that all students are valued and listened to within college.

The college recognises the importance of providing a safe space for young people to discuss controversial issues; and building their resilience and the critical thinking skills they need to challenge extremist perspectives. However, the DSL will make appropriate referrals to the Police PREVENT team and Channel programme in respect of any student whose behaviour or comments suggest that they are vulnerable to being radicalised and drawn into extremism and terrorism to ensure that young people receive appropriate support.

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 considered at the Local Channel panel. The Channel panel is made up of multi-agency professionals who discuss the individuals referred to determine whether they are vulnerable to being drawn into terrorism and consider the appropriate support required. The DSL 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.

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

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 college teachers and leaders to help them safeguard their students from radicalisation and extremism.
- The Education and Training Foundation (ETF) hosts the [Prevent for FE and Training](#).

Private Fostering

A [private fostering](#) arrangement occurs when someone other than a parent or a close relative cares for a young person for a period of 28 days or more, with the agreement of the young person's parents. It applies to young people under the age of 16, or under 18 if the young person is disabled. Private fostering occurs in all cultures, including British culture and young people may be privately fostered at any age.

Most privately fostered young people remain safe and well, but safeguarding concerns have been raised in some cases, so it is important that colleges are alert to possible safeguarding issues, including the possibility that a young person has been trafficked into the country.

By law, a parent, private foster carer or other persons involved in making a private fostering arrangement must notify Children's Social Care as soon as possible. When the college becomes aware of a private fostering arrangement for a student that has not been notified to Social Care, the college will encourage parents and private foster carers to notify Social Care and will share information with Social Care as appropriate.

So-called 'honour based' abuse

So-called 'honour-based' abuse (HBA) encompasses crimes which have been committed to protect or defend the honour of a family and/or community. Such crimes include 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.

Staff will be alert to the possibility of a young person being at risk of HBA or already having suffered HBA. Regardless of the motivation, staff will record and report any concerns about a young person who might be at risk of HBA to the Designated Safeguarding Lead as with any other safeguarding concern. The DSL will consider the need to make a referral to the Police, and/or Children's Social Care as with any other young person protection concern; and may also contact the Forced Marriage Unit for advice as necessary.

Bullying and young person on young person abuse

All young people have a right to attend college and learn in a safe environment. Young people should be free from harm, both from adults and other students in the college.

Young people may be harmed by other young people; research suggests that 30% of young person abuse is perpetrated by those under 18. All staff recognise that young people can abuse their peers and are trained to understand and implement the college's policy and procedures regarding young person-on-young person abuse. All young person-on-young person abuse is unacceptable and will be taken seriously. Advice and guidance has been produced [Preventing and Tackling Bullying](#)

It is most likely to include, but is not limited to:

- bullying (including cyberbullying).
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm;
- sexual violence/harm, such as rape, assault by penetration and sexual assault;
- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be stand-alone 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);
- Up skirting 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, which comes under The Voyeurism (Offences) Act 2019. Anyone of any gender, can be a victim;
- teenage relationship abuse - defined as a pattern of actual or threatened acts of physical, sexual or emotional abuse, perpetrated against a current or former partner;
- initiation/hazing - used to induct newcomers into an organisation such as sports team or college groups by subjecting them to a series of potentially humiliating, embarrassing or abusing trials which promote a bond between them; and
- prejudiced behaviour - a range of behaviours which causes someone to feel powerless, worthless or excluded and which relates to prejudices around belonging, identity and equality, prejudices linked to disabilities, special educational needs, ethnic, cultural and religious backgrounds, gender and sexual identity.

Bullying is a very serious issue that can cause young people considerable anxiety and distress. At its most serious level, bullying can have a disastrous effect on a young person's well-being and in very rare cases has been a feature in the suicide of some young people. All incidences of bullying, including cyber-bullying and prejudice-based bullying should be reported and will be managed through the Disciplinary Policy and Procedures

All students and parents receive a copy of the Disciplinary Policy on joining the college and the subject of bullying is addressed at regular intervals. All members of staff receive a copy of the college's Disciplinary Policy and Procedures, as part of their induction and are trained to be aware of the harm caused by bullying and to respond to all incidents of bullying and young person on young person abuse proactively.

Abuse is abuse and will not be tolerated, minimised or dismissed as 'banter'; 'just having a laugh'; 'part of growing up'; 'boys being boys'; or 'girls being girls. It is important for the college to consider the wider environmental factors and context within which young person on young person abuse occurs.

The College will also consider the potential for the impact of the incident to extend further than the college /college's local community (e.g. for images or content to be shared around neighbouring colleges/colleges) and for a victim (or alleged perpetrator) to become marginalised and excluded by both online and offline communities.

There is also the strong potential for repeat victimisation in the future if abusive content continues to exist somewhere online. Online concerns can be especially complicated. Support is available from The UK Safer Internet Centre at 0344 381 4772 and helpline@saferinternet.org.uk and the Internet Watch Foundation at <https://www.iwf.org.uk/>

Young people who are lesbian, gay, bi, transgender or identify alternatively (LGBTQ+)

Young people who are lesbian, gay, bi, or trans + (LGBT+) can be targeted by other young people. In some cases, a young person who is perceived by other young people to be LGBTQ+ (whether they are or not) can be just as vulnerable as young people who identify as LGBTQ+.

LGBTQ+ inclusion is part of the statutory Relationships Education, Relationship and Sex Education and Health Education curriculum and there is a range of support available to support our college/ college counter homophobic, biphobic and transphobic bullying and abuse.

Sexual violence/harm/and sexual harassment

Sexual violence/harm, sexual harm and sexual harassment can occur between two young people of any age and gender and between young people of the opposite or the same gender. They can also occur through a group of young people sexually assaulting or sexually harassing a single young person or group of young people. Staff are aware of sexual violence/harm and the fact young people can, and sometimes do, abuse their peers in this way. Sexual violence/harm and sexual harassment exist on a continuum and may overlap, they can occur online and offline (both physically and verbally) and are never acceptable.

Young people who are victims of sexual violence/harm and sexual harassment will likely find the experience stressful and distressing. This will, likely, adversely affect their educational attainment. While it is important that all victims are taken seriously and offered appropriate support, staff are trained to be aware that it is more likely that girls, young people with SEND and LGBT young people are at greater risk of sexual violence/harm and sexual harassment and more likely it will be perpetrated by boys.

When referring to sexual violence/harm, this policy uses the definitions of sexual offences in the Sexual Offences Act 2003 as follows:

- 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.

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

- A young person under the age of 13 can never consent to any sexual activity
- A young person under 18 cannot consent to any sexual activity with a person in a position of trust
- The age of consent is 16.
- Sexual intercourse without consent is rape.

Sexual harassment is 'unwanted conduct of a sexual nature' that can occur online and offline. Sexual harassment is likely to: violate a young person's dignity, and/or make them feel intimidated, degraded, or humiliated and/or create a hostile, offensive or sexualised environment. Online sexual harassment may happen on its own or as part of a wider pattern of sexual harassment and/or sexual violence/harm.

Sexual harassment creates an atmosphere that, if not challenged, can normalise inappropriate behaviours and provide an environment that may lead to sexual violence/harm. We recognise the importance of identifying and challenging sexual violence/harm and sexual harassment in its wider approach to safeguarding and promoting the welfare of young people; through policies; and through the curriculum. All staff recognise the importance of:

- making clear that sexual violence/harm 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/harm or sexual harassment as "banter", "part of growing up", "just having a laugh" or "boys being boys"
- challenging behaviours (potentially criminal in nature), such as grabbing bottoms, breasts, and genitalia, flicking bras, lifting skirts and up skirting.
- Dismissing or tolerating such behaviours risks normalising them.

The college/college will respond to reports in accordance with Part 5 of [Keeping Children Safe in Education](#) 2022. Colleges may also find it useful to refer to the [Farrer child on child abuse toolkit](#). All responses to reports of sexual violence/harm will be subject to an immediate risk and needs assessment undertaken by the DSL (or a deputy), using their professional judgement, and supported by other agencies, such as Children's Social Care and the Police. The need for a risk and needs assessment in relation to reports of sexual harassment will be considered on a case-by-case basis.

Risk assessment

- The risk and needs assessment will consider:
 - the victim, especially their protection and support.
 - the alleged perpetrator/s (if she/he/they attend the same college/college); and
 - all the other young people (and, if appropriate, adult students and staff) at the college or college, especially any actions that are appropriate to protect them.
- The DSL should ensure they are engaging with children's social care and specialist services as required.
- Police are notified when a crime may have occurred.
- Where there has been a report of sexual violence/harm, it is likely that professional risk assessments by social workers and or sexual violence/harm specialists will be required.

Action following a report of sexual violence, harm and/ or sexual harassment - what to consider

The designated safeguarding lead is likely to have a complete safeguarding picture and will therefore be the most appropriate person to lead the college/college's initial response.

Important considerations will include:

- the wishes of the victim in terms of how they want to proceed. This is especially important in the context of sexual violence/harm and sexual harassment. Victims will be given as much control as is reasonably possible over decisions regarding how any investigation will be progressed and any support that they will be offered. However, if

the victim asks the college/college not to tell anyone about the sexual violence/harm or sexual harassment, the DSL (or a deputy) will have to balance the victim's wishes against their duty to protect the victim and other young people. It is likely to be justified and lawful to share the information if doing so is in the public interest, e.g. to protect the victim and other young people from harm and to promote the welfare of Young people;

- the nature of the alleged incident(s), including whether a crime may have been committed and consideration of harmful sexual behaviour.
- the ages of the young people involved.
- the developmental stages of the young people involved.
- any power imbalance between the young people. For example, is the alleged perpetrator significantly older, more mature, or more confident? Does the victim have a disability or learning difficulty?
- if the alleged incident is a one-off or a sustained pattern of abuse.
- whether there are ongoing risks to the victim, other young people, adult students, or college/college staff.
- informing parents/carers unless this would put the victim at greater risk);
- only sharing information with those staff who need to know in order to support the young people involved and/or be involved in any investigation. For instance, vocational staff may be asked to monitor the victim's welfare without needing to know that they are a victim of sexual violence/harm or harassment.

Young people sharing a classroom - initial considerations following a report of sexual violence/harm/harassment

Any report of sexual violence/harm or harassment is likely to be traumatic for the victim. However, reports of rape and assault by penetration are likely to be especially difficult regarding the victim and proximity with the alleged perpetrator is likely to be especially distressing. Whilst the college/college establishes the facts of the case and starts the process of liaising with Children's Social Care and the Police, the alleged perpetrator will usually be removed from any classes they share with the victim. Consideration will also be given to how best to keep the victim and alleged perpetrator a reasonable distance apart on college/college premises and on transport to and from the college/college, where appropriate. These actions are in the best interests of both young people and should not be perceived to be a judgment on the guilt of the alleged perpetrator.

For other reports of sexual violence/harm and sexual harassment, the proximity of the victim and alleged perpetrator and considerations regarding shared classes, sharing college/college premises and transport, will be considered immediately. In all cases, the wishes of the victim, the nature of the allegations and the protection of all young people in the college or college will be especially important when considering any immediate actions.

Sharing of nude and semi-nude images and/or videos (also known as Youth Produced Sexual Imagery YPSI or 'sexting').

The college will act in accordance with advice endorsed by DfE which can be found at: <https://www.gov.uk/government/publications/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-Young-people-and-young-people>. (UK Council for Young person Internet Safety 2017).

All incidents of consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as Youth Produced Sexual Imagery -YPSI) will be dealt with as safeguarding concerns. The primary concern always will be the welfare and protection of the young people involved. Young people (under 18) who share sexual imagery of themselves or their peers are breaking the law. Still, authorities will avoid criminalising young people unnecessarily.

All incidents of YPSI should be reported to the DSL. If there is a YPSI issue in relation to a device (e.g., mobile phone, tablet, digital camera), the member of staff will secure the device (i.e. it should be confiscated). This is consistent with DfE advice [Searching, Screening and Confiscation - Advice for headteachers, college staff and governing bodies](#) 2018. Staff will not look at (unless directed to do so by police), copy or print any indecent images as this would be a criminal offence. The confiscated device will be passed immediately to a DSL. The DSL will discuss the concerns with appropriate staff and speak to young people involved as appropriate. Parents/carers will be informed at an early stage and involved in the process unless there is good reason to believe that involving parents would put the young person at risk of harm. If, at any point in the process, there is concern that a young person has been harmed or is at risk of harm a referral will be made to Children's Social Care and/or the Police via the MASH immediately. The Police will always be informed when there is reason to believe that indecent images involve sexual acts and any young person in the imagery is under 13 years of age.

The DSL will make a judgement about whether a reported YPSI incident is experimental (e.g., a young person sending an image to a young person with whom they are romantically involved) or aggravated. Aggravated incidents involve criminal or abusive elements beyond the creation, sending or possession of sexual images created by young people. These include possible adult involvement or criminal or abusive behaviour by young people such as sexual abuse, extortion, threats, malicious conduct arising from personal conflicts, or creation or sending or showing of images without the knowledge or against the will of a young person who is pictured. Aggravated incidents of sexting will be referred to MASH.

For further reference on how to support with concerns around HSB within your college please refer to <https://www.csnetwork.org.uk/en/beyond-referrals-levers-for-addressing-harmful-sexual-behaviour-in-colleges>.

Appendix 2

Thresholds for social care intervention

Level 1 – Universal



Universal services are key partners in the delivery of a preventative approach to improving outcomes for young people. Services delivered at the universal level meet the needs of most young people. These ‘universal services’ are those services (sometimes also referred to as mainstream services) that are provided to or are routinely available to, all young people and their families. Universal services are designed to meet the sorts of needs that should enhance the lives and wellbeing of all our young people.

Most young people will not require intervention beyond the universal level of support within the borough available to all– these will not require social care intervention.

Level 2 – Vulnerable

Vulnerable needs requiring targeted support, when the needs of the young person can no longer be fully met within Universal provision. These young people and their families may have low level additional needs that are likely to be short term and that are sometimes known but unmet. In this context, a Common Assessment should be completed with the family and young person or young person. At this point the Team around the Child and Family processes should commence if support is required from more than one professional service. The team is coordinated by a Lead Professional to provide a consistent link for the family.

Waltham Forest’s Early Help and Thresholds Criteria for Intervention which can be found here www.walthamforest.gov.uk/sites/default/files/early_help_thresholds.pdf details the agreed thresholds for intervention at different levels of risk to young people and young people within Waltham Forest. Early Help intervention requires parental consent and

engagement. Providing early help is more effective in promoting the welfare of young people than reacting later. The aim is to prevent further issues arising and current issues escalating.

In cases where consent is not given for an early help assessment, practitioners should consider how the needs of the young person might be met. If at any time it is considered that the young person may be a young person in need, or that the young person has suffered significant harm or is likely to do so, a referral should be made immediately to [MASH](#).

Level 3 – Complex

For young people and young people whose needs are complex, the lead professional will be a social worker who will work closely with the young person and family to ensure a single assessment and deliver the right support and intervention. These young people will be eligible for social care services, outlined in a young people in Need plan, because they are at risk of moving to a higher threshold for intervention from specialist services. In most cases the social worker will act as the lead professional to coordinate the work of all agencies with the young person and family. "Asset" is the risk assessment tool used to assess the likelihood of a young person going on to commit an offence and to identify what areas of work need to be undertaken to reduce this risk.

Section 17 of the Childrens Act 1989 places a general duty on every Local Authority to safeguard and promote the welfare of children living within their area who are in need and to promote the upbringing of such children, wherever possible by their families, through providing an appropriate range of services. A child in need is defined under the Childrens Act 1989 as a child who is unlikely to achieve or maintain a reasonable level of health or development, or whose health and development is likely to be significantly or further impaired, without the provision of services; or a child who is disabled. Local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare. Children in need may be assessed under section 17 of the Children's Act 1989.

Level 4 – Acute

Acute Specialist Services are required where the needs of the young person or young person are so great that statutory and /or specialist help, and intervention is required to keep them safe or to ensure their continued development. These span the multi-agency partnership including Children's Social Care, Child and Adolescent Mental Health Services and Level 3 and 4 Youth Offending Services.

By effective integrated working in Waltham Forest, we aim to reduce the escalation of those young people and families requiring targeted support to prevent more young people requiring specialist and statutory interventions. To ensure the right support, in the right place at the right time.

In Waltham Forest we are developing a confident integrated workforce with a common core of knowledge and understanding to support and intervene effectively to safeguard young people, and families.

A very small number of young people for whom targeted support will not be enough will have more significant and acute needs which meet the threshold for Stage 4 intervention. This includes young people who are experiencing significant harm or where there is a likelihood of significant harm and young people at risk of removal from home.

s47 or Child Protection intervention is the process for young people where there is reasonable cause to suspect that the young person is suffering or likely to suffer significant harm (this includes immediate protection for young people at serious risk of harm).

Appendix 3

Designated Safeguarding Lead

A Designated Safeguarding Lead (DSL) is a member of the Senior Leadership Team, appointed to support the management of safeguarding cases. The DSL should take lead responsibility for safeguarding and young person protection (including online safety). A DSL should be given the time, funding, training, resources and support undertake duties as listed below. Whilst the activities of the DSL can be delegated Designated Members of Staff for Safeguarding, the ultimate lead responsibility for young person protection remains with the Primary DSL.

The Primary and Secondary DSL should undergo training to provide them with the knowledge, skills and confidence required to carry out the role. This training should be updated every two years. In addition to the training, should update their knowledge and skills at regular intervals and at least annually. Both DSL's are trained to the same level as the DSL and can take over seamlessly in the event of the DSL being absent.

During term time, a DSL should always be available to support and/or discuss any safeguarding concerns. A duty rota will be organised to provide staff with advice, information and signposting out of hours and over weekends / college holidays in the event of an emergency.

The DSL role includes, but is not limited by, the following:

Management of referrals

- Refer cases of suspected abuse to Children's social care and police as appropriate. [NPCC- When to call the police](#) should help DSLs to understand when they should consider calling the police and what to expect when they do.
- Refer cases to the Channel programme where there is a radicalisation concern as appropriate.
- Refer cases where a person is dismissed or left due to risk/harm to a young person to the Disclosure and Barring Service as appropriate.

Provides Advice and Support

- Acts as a source of advice, support, expertise, and liaison to the college community.
- Liaise with the Principal to inform him or her of issues especially ongoing enquiries under section 47 of the Young people Act 1989 and police investigation
- Liaise with staff (especially pastoral support staff, college nurses, IT Technicians, and SENCOs) on matters of safety and safeguarding (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies.
- Support staff who make referrals to Children's Social Care
- Support staff who make referrals to the Channel programme

Provides Expertise

- Has a working knowledge of relevant national guidance in respect of all specific safeguarding issues highlighted in Parts 1, 4 & 5, and Annex A, B and C of [Keeping Children Safe in Education](#) 2022, ensuring that all staff receive necessary training, information and guidance
- Understands the assessment process for providing early help and statutory intervention, including the criteria making a referral to MASH.
- Has working knowledge of how a child protection case conference and a child protection review conference is undertaken by Children's social care and be able to attend and contribute to these effectively when required to do so
- Understands relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the General Data Protection Regulations;
- Understands the importance of information sharing, both within the college and college, and with the three safeguarding partners, other agencies, organisations and practitioners; [Data protection: a toolkit](#) 2018, guidance developed to support colleges with data protection activity, including compliance with GDPR.
- Understands and supports the requirements of the Prevent duty and can provide advice and support to staff on protecting young people from the risk of radicalisation;
- Understands the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep young people safe whilst they are online at college or college;
- Can recognise the additional risks that young people with SEN and disabilities (SEND) face online, for example, from online bullying, grooming and radicalisation and are confident they have the capability to support SEND Young people to stay safe online
- Understands that young people can be at risk of abuse or exploitation in situations outside their families.
- Understands the local multi-agency safeguarding arrangements and procedures and links with the safeguarding partners to make sure staff are aware of any training opportunities and the latest local policies on local safeguarding arrangements.

Maintains & Manages Records

- Keeps detailed records in confidential files, ideally via an online safeguarding recording system, that are separate from the main student file and stored securely. Files records need to be dated with a clear record of who entered the record
- Ensures that, when a student under the age of 18 years leaves college, all young person protection records are passed to the new setting (separately from the main student file and ensuring secure transit) and confirmation of receipt is obtained. If the young person is the subject of an open case to Children's Social Care, the student's social worker is also informed.

Champions young people's Wellbeing

- Encourages a culture of listening to and taking account of young people's wishes and feelings.
- Is alert to the specific needs of young people with special educational needs, young people in need, young people subject to child protection or care proceedings, young people in care, young carers, young people with vulnerabilities to provide effective pastoral support and liaison with other agencies.

- Ensures that young people are supported to be able to identify risk in their lives or those of their peers in an age-appropriate way, and that they know how they can report it.
- Is responsible for promoting educational outcomes by knowing the welfare, safeguarding and young person protection issues that young people in need are experiencing, or have experienced, and identifies the impact that these issues might be having on young people's attendance, engagement and achievement.
- Oversees pastoral care.
- Ensuring the appointment of Personal Mentors who have responsibility for students who are looked after by the local authority and those who have left care through adoption, special guardianship or young person arrangement orders, or who were adopted from state care outside of England.
- Helps promote educational outcomes by sharing the information about the welfare, safeguarding and young person protection issues that young people, including young people with a social worker, are experiencing, or have experienced, with teachers and college and college leadership staff.
- Support teaching staff to identify the challenges that young people who are experiencing or have experienced welfare, safeguarding and young person protection issues might face and the additional academic support and adjustments that they could make to best support these young people.
- Understands that young people may find it difficult to approach staff to express their concerns therefore has put in place additional measures that help to support young people to be able to do this.

Primary point of contact for safeguarding

- Act as a point of contact with safeguarding partners
- Attends and/or contributes to young person protection conferences, strategy meetings and multi-agency sexual exploitation (MASE) meetings.
- Co-ordinates contribution to young person protection plans as part of core groups, attending and actively participating in core group meetings.
- Develops effective links with relevant statutory and voluntary agencies, including the local safeguarding partnership.
- Works in partnership with social workers and with safeguarding partnership to support the young person.
- Ensures social care is notified if a student on a child protection plan is absent for more than two days.

Supports and Liaises with Parents, Carers & Families

- Ensures parents are aware of the college's role in safeguarding and that referrals about suspected abuse and neglect may be made.
- Ensures that the safeguarding policies are made publicly available (e.g., on the website) and are easily accessible to all (staff, parents, Young people, those for whom English is not a first language).

Sets and Communicates Policy

- Updates safeguarding policies (safeguarding, young person protection, online safety, safer recruitment, code of conduct, etc) annually in line with the Local Safeguarding Partnership and statutory requirements
- Ensure staff sign to indicate that they have read and understood:

- [Keeping Children Safe in Education](#) 2022 Part 1.
- The safeguarding policy
- The staff code of conduct, and safeguarding code of conduct
- The Disciplinary Policy and Procedures including de-escalation tactics, and appropriate staff are trained on acceptable restraint
- The safeguarding response to for young people who go missing from education
- The role of the designated safeguarding lead & how to get in touch
- The Primary DSL ensures that the young person protection and safeguarding policy and procedures are reviewed and updated at least annually, working with the whole college/college community of students, parents, staff, volunteers and governors and/or proprietors regarding this.
- Keeps a record of staff attendance at young person protection training.

Coordinates Training & Induction

- Develops a training strategy to ensure that all staff obtain the appropriate training / updates, skills, and knowledge to safeguard young people effectively within the local Safer Partnership requirements.
- Undertakes appropriate training themselves, including attending regular DSL Forums, and is given appropriate time and resources to carry out the role.
- Ensures that all staff understand that if they have any concerns about a young person's welfare, they should act on them immediately, either by speaking to the DSL or, in exceptional circumstances, taking responsibility to make a referral to Children's Social Care.
- Ensures that all staff know how to make a referral to Children's social care.
- Quality assures casework by other staff, possibly through supervision.
- Ensures each member of staff has access to, and understands, the college's or Safeguarding policy and procedures, especially new and part time staff;

Ensures Safer Recruitment / Management of Allegations against Staff & Volunteers

- Ensures Safer Recruitment as per the Safer Recruitment policy; develops safeguarding induction strategy for all new / temporary staff.
- Ensures all staff, including temporary staff and volunteers have read the college's safeguarding policy and the Code of Conduct prior to access to young people.
- Ensures that the Principal is aware of the responsibility under [Working Together to Safeguard Young people](#) 2018 to refer all allegations that a young person has been harmed by or that young people may be at risk of harm from a member of staff (including supply staff) or volunteer to the Designated Officer in the Local Authority (LADO) within one working day prior to any internal investigation; and to the Disclosure and Barring Service (DBS) as appropriate.

Appendix 4

Standards for Effective Safeguarding Practice in Colleges

The college's young person protection and safeguarding responsibilities are inspected under the 'Leadership and Management' judgement in Ofsted inspections. The following standards may assist colleges in evaluating their practice. They should be used jointly by the Designated Safeguarding Lead and the Designated Link Governor for Safeguarding to ensure the college is effective in safeguarding and young person protection matters.

In best practice, colleges:

- Have an ethos in which young people feel secure, their viewpoints are valued, and they are encouraged to talk and are listened to.
- Provide suitable support and guidance so that students have a range of appropriate adults to whom they can turn if they are worried or in difficulties.
- Work with parents to build an understanding of the college's responsibilities to safeguard and promote the welfare of all young people and a recognition that this may occasionally require young people to be referred to investigative agencies as a constructive and helpful measure.
- Ensure all staff can identify young people who may benefit from early help; provide co-ordinated offers of early help; and ensure that young people receive the right help at the right time to address concerns and risks and prevent issues escalating.
- Are vigilant in cases of suspected young person abuse, recognising the signs and symptoms, have clear procedures whereby all members of staff report such cases to a Designated Safeguarding Lead, and are aware of Local Authority and procedures so that information is passed on effectively to the relevant professionals.
- Monitor young people who have been identified as in need of early help or at risk; maintain clear records of students' progress and welfare *in a secure place*; maintain sound policies on confidentiality; provide appropriate information to other professionals; and submit reports to and attend young person protection conferences.
- Provide and support regular young person protection training and updates for all college staff and ensure that Designated Safeguarding Leads attend refresher training every two years to ensure their skills and expertise are up to date; and ensure that targeted funding for this work is used solely for this purpose.
- Contribute to an inter-agency approach to safeguarding and young person protection by developing effective and supportive liaison with other agencies.
- Use the curriculum to teach young people about safeguarding and raise their awareness and build confidence so that students have a range of contacts and strategies to identify risk, know who they can talk to about anything causes them concern and understand the importance of protecting others.
- Provide clear policy statements for parents, staff and young people and young people on this and on both positive behaviour policies and the college's approach to bullying.
- Have a clear understanding of the various types of bullying and young person on young person abuse – face to face, online, physical, verbal, sexual, prejudice based and indirect - and act promptly and firmly to combat it, making sure that students are aware of the college's position on this issue and who they can contact for support.
- Have a clear understanding of the signs and impact of racist, disability, homophobic, transphobic, and teenage relationship abuse; and a clear commitment to identifying

and challenging those forms of abuse in order to safeguard Young people and maintain the safeguarding culture of the college.

- Take particular care that students with SEN in mainstream and special colleges, who may be especially vulnerable to abuse, are supported effectively with attention paid to ensuring that those with communication difficulties are enabled to express themselves to a member of staff with appropriate communication skills.
- Have a clear policy about the handling of allegations of abuse by members of staff, ensuring that all staff are fully aware of the procedures and that they are followed correctly at all times, using the guidance set out in [Keeping Young people Safe in Education](#) 2022 and London Child Protection Procedures which can be found online,
- Have a written whole college safeguarding policy, which is produced, owned and regularly reviewed by all college staff, considering the views of young people, parents/carers and governors, and which clearly outlines the college's position and positive action in respect of the standards;
- Ensure that specified information is passed on in a timely manner to the Local Authority for monitoring purposes;
- Have a Single Central Record in place that fully complies with the guidance in [Keeping Young people Safe in Education](#) 2022.
- Ensure appropriate arrangements are in place in relation to external professionals visiting young people on site including ensuring they have read and understood the young person protection policy.

For advice and support about any safeguarding matter in college or for information about a range of safeguarding training courses, please contact the Education Safeguarding Service:
Email: safeguardingineducation@walthamforest.gov.uk Telephone: 020 8496 3646

Caroline Coyston, LADO and Safeguarding in Education Team Manager
Susannah Bennett, LADO and Safeguarding in Education Assistant Team Manager
(Colleges Lead)

For Escalations contact:

Gillian Nash, Head of Settings and Workforce Safeguarding
Email: Gillian.Nash@walthamforest.gov.uk Telephone: 020 8496 3682

Appendix 5

Allegations against staff and volunteers (ASV)

If there are any concerns that a practitioner (including supply teachers) or volunteer has caused harm (emotional, physical, sexual, neglect) to a young person, this represents an allegation against staff and volunteers.

All allegations against staff (including supply teachers) and volunteers must be reported to the Principal in the first instance. The person against whom the allegation is made should not be notified at this point. The Principal can delegate authority to another member of the senior leadership team to take appropriate action.

The full procedures for dealing with allegations against staff can be found in Part 4 of [Keeping Children Safe in Education](#) 2022, and Part 7 of London Child Protection Procedures available online.

Initial Action by person receiving or identifying an allegation or concern

- Whilst allegations may be false, malicious or misplaced, they may also be founded in truth; all staff must report allegations even if they reasonably believe them to be false.
- All allegations must be investigated properly, in line with agreed procedures and outcomes recorded.
- Staff must treat all allegations seriously and keep an open mind.
- All low-level concerns should be discussed and decided upon in conjunction with LADO in congruence with local procedures.
- Make a written record of the information, including the time, date and place of incident/s, persons present and what was said and sign and date this.
- Immediately report the matter to the headteacher/proprietor.
- Do not share allegations with any other member of staff, including the subject of the allegation.
- If the allegation is against the headteacher, staff must report to chair of governors / trustees.
- If there is a lack of faith in the safeguarding governance, all staff can contact the local authority's Designated Officers (also known as LADOs) directly, without delay:
020 8496 3646 / LADO@walthamforest.gov.uk.

Threshold for statutory LADO involvement

As required by [Working Together to Safeguard Children](#) 2018, all allegations in respect of an individual who works at the college that fulfil any of the following criteria will be reported to the Designated Officer in the Local Authority (LADO) within one working day:

- Behaved in a way that has harmed a young person, or may have harmed a young person
- Possibly committed a criminal offence against or related to a young person
- Behaved towards a young person in a way that indicates they may pose a risk of harm to young people
- Behaved or may have behaved in a way that indicates they may not be suitable to work with young people

Young people (victims)

- If young people are identified as victims of harm, they must be protected from harm.
- If young people are believed to have suffered / likely to suffer significant harm, they must be referred to MASH.
- Concerns must be discussed with young people's parents at the earliest opportunity; they must maintain confidentiality during the investigation phase of the LADO process.

Subject of allegations

- Staff who are the subject of an allegation have the right to have their case dealt with fairly, quickly and consistently and to be kept informed of its progress.
- The College will appoint a named contact person for the subject of the allegation, they will be advised to seek advice / support from a union rep; the employee assistance programme information will be shared.
- Monox as employers have a duty of care to their employees. Effective support for anyone facing an allegation should be provided
- Where the college is not the employer of an individual they still have responsibility to ensure allegations are dealt with appropriately, liaising with relevant parties (this includes supply teachers and volunteers,

Supply teachers

- Monox Sixth Form will ensure allegations against supply teachers are dealt with properly. In no circumstances should a college decide to cease to use a supply teacher due to safeguarding concerns, without finding out the facts and liaising with the LADO to determine a suitable outcome.
- Governing bodies and proprietors should discuss with the agency whether it is appropriate to suspend the supply teacher, or redeploy them to another part of the college, whilst they carry out their investigation.
- Agencies should be fully involved and co-operate in any enquiries from the LADO, police and/or Children's social services.
- Monox Sixth Form will take the lead because agencies do not have direct access to young people or other college staff, so they will not be able to collect the facts when an allegation is made, nor do they have all the relevant information required by the LADO as part of the referral process.
- Supply teachers, whilst not employed by the college, are under the supervision, direction and control of the governing body or proprietor when working in the college or college. They should be advised to contact their trade union representative if they have one, or a colleague for support.
- The ASV meeting arranged by the LADO will address issues such as information sharing, to ensure that any previous concerns or allegations known to the agency are considered by the college during the investigation.
- When using an agency, the college should inform the agency of its process for managing allegations. This should include inviting the agency's human resource manager or equivalent to meetings and keeping them up to date with information about its policies.

Suspension

- Suspension is not the default option and alternatives to suspension will always be considered.

- It is usually preferable if the young person involved in allegation and the practitioner in question are not in contact.
- In some cases, staff may be suspended where this is deemed to be the best way to ensure that allegations are investigated fairly, quickly, and consistently and that all parties are protected. In the event of suspension, the college will provide support and a named contact for the member of staff, who will be in touch periodically as agreed upon suspension.

Confidentiality

- Staff, parents, and governors are reminded that publication of material that may lead to the identification of a teacher who is the subject of an allegation is prohibited by law. Publication includes verbal conversations or writing, including content placed on social media sites.
- In accordance with [Keeping Children Safe in Education](#) 2022, the college will make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered.

Non-recent / historical allegations

- Allegations concerning staff who no longer work at the college or historical allegations will be reported to the Police.

False Allegations

- It is relatively rare for a young person to make an entirely false or malicious allegation, although misunderstandings and misinterpretations of events do happen. If, following investigation, it transpires that a young person has made a false allegation, there may be other concerns regarding their welfare that may need to be unpicked or assessed.
- If an adult makes a false allegation and they are employed, this will result in disciplinary procedures. If an individual makes false allegation and police are involved, they may charge them with 'wasting police time' or 'perverting the course of justice'.

Behaviour in Personal Life

- As well as concerns related to conduct towards young people, practitioners must be alert to their behaviour and events occurring in their private life. For example, if practitioners' own young people become subject to young person protection investigations, or if they exhibit worrying violent or sexual behaviour that could impact on their suitability to work with young people.

Disqualification

All Staff:

- All practitioners must be alert to the amended guidance on disqualification which is no longer only in relation to staff working with children under 8 years. Their relationships and associations (including online) may have an implication for the safeguarding of students, and if there are concerns about that, practitioners must inform college.
- All staff should be alert to the fact that they are responsible for alerting college if their circumstances change.

- College will retain records of self-declarations on the Single Central Record.

Abuse of position of trust

- All college staff are aware that inappropriate behaviour towards students is unacceptable and that their conduct towards students must be beyond reproach.
- In addition, staff should understand that, under the [Sexual Offences Act](#) 2003, it is an offence for a person over the age of 18 to have a sexual relationship with a person under the age of 18, where that person is in a position of trust, even if the relationship is consensual. This means that any sexual activity between a member of the college staff and a student under 18 may be a criminal offence, even if that student is over the age of consent.
- Such a relationship will nonetheless always be viewed as a significant safeguarding concern and would constitute a reason for dismissal and referral to DBS for safeguarding reasons.

LADO Outcomes

The following definitions should be used when determining the outcome of allegation investigations:

- **Substantiated allegations**
There is sufficient evidence to prove the allegation that a young person has been harmed or there is a risk of harm.
If the facts of the incident are found to be true but it is not found that a young person has been harmed or there is a risk of harm, then consideration should be given to deciding that the outcome is 'unsubstantiated' or 'unfounded'.
- **Malicious**
There is enough evidence to disprove the allegation and there has been a deliberate act to deceive. The police should be asked to consider what action may be appropriate in these circumstances.
- **False allegations**
There is enough evidence to disprove the allegation, however, there is no evidence to suggest that there was a deliberate intention to deceive.
False allegations may be an indicator of abuse elsewhere which requires further exploration. If an allegation is demonstrably false, the employer, in consultation with the LADO, should refer the matter to LA Children's social care to determine whether the young person needs services, or might have been abused by someone else.
- **Unsubstantiated allegations**
There is insufficient evidence to either prove or disprove the allegation. The term, therefore, does not imply guilt or innocence.
- **Unfounded**
The additional definition of 'unfounded' can be used to reflect cases where there is no evidence or proper basis which supports the allegation being made. It might also indicate that the person making the allegation misinterpreted the incident or was mistaken about what they saw. Alternatively, they may not have been aware of all the circumstances.

The Chair of the meeting / discussion should make a record of the agreed outcome and forward this to the employer.

- References in cases where the allegation is false, unsubstantiated or malicious

- Cases in which an allegation was proven to be false, unsubstantiated or malicious should not be included in employer references.
- A history of repeated concerns or allegations which have all been found to be false, unsubstantiated or malicious should also not be included in any reference unless specifically asked for in a reference proforma. Please seek HR advice in this instance.

Record keeping in relation to the outcome of an investigation

- Details of allegations that are found to have been malicious should be removed from personnel records.
- For all other allegations, it is important that a clear and comprehensive summary of the allegation, details of how the allegation was followed up and resolved, and a note of any action taken and decisions reached, is kept on the confidential personnel file of the accused, and a copy provided to the person concerned.
- The purpose of the record is to enable accurate information to be given in response to any future request for a reference, where appropriate.
- It will provide clarification in cases where future DBS checks reveal information from the police about an allegation that did not result in a criminal conviction and it will help to prevent unnecessary re-investigation if, as sometimes happens, an allegation re-surfaces after a period.
- The record should be retained at least until the **accused has reached normal pension age or for a period of 10 years from the date of the allegation if that is longer.**

DBS Referrals

- The college has a legal duty to refer any person engaged to work in regulated activity in the college where the allegation has been substantiated, or where harm test has been met, irrespective of whether another body has made a referral to the DBS in relation to the same person; failure to do so is an offence.
- DBS referral can take place at any time during the Allegations / Disciplinary process – it should take place at the earliest stage possible. There could be times when you consider that you should make a referral in the interests of safeguarding young people or vulnerable adults even if you have not removed the person from working in regulated activity; this could include acting on advice of the police or a safeguarding professional, or in situations where you don't have enough evidence to dismiss or remove a person from working with vulnerable groups. Making DBS referrals where the referral conditions are not met, will be done in consideration of relevant employment and data protection laws.
- DBS are required by law to consider all information sent to us from any source. This includes information sent to us where the legal referral conditions are not met. DBS will use legal powers and barring processes to determine whether the person should be barred from working in regulated activity with Young people and / or vulnerable adults.
- Harm, in this case, is not defined in legislation. DBS view harm as its common understanding, or the definition you may find in a dictionary. Harm is considered in its widest context and may include (This is not a fully comprehensive list; harm can take many different forms):
 - sexual harm
 - physical harm

- financial harm
- neglect
- emotional harm
- psychological harm
- verbal harm

As an employer of practitioners and volunteers in a regulated activity, the college must make a referral when both of the following conditions have been met:

Condition 1

- Permission is withdrawn for a person to engage in regulated activity with children and/or vulnerable adults, including moving the person to another area of work that isn't regulated activity.
- This includes situations when you would have taken the above action, but the person was re-deployed, resigned, retired, or left. For example, a teacher resigns when an allegation of harm to a student is first made.

Condition 2

- You think the person has carried out one (1) of the following:
 - engaged in relevant conduct in relation to young people and/or adults. An action or inaction has harmed a young person or vulnerable adult or put them at risk or harm, or;
 - satisfied the harm test in relation to young people and / or vulnerable adults. e.g., there has been no relevant conduct but a risk of harm to a young person or vulnerable still exists, or;
 - been cautioned or convicted of a relevant (automatic barring either with or without the right to make representations) offence
- When employing agency staff, both the college and agency have a responsibility to refer as above.
- Relevant conduct in relation to a young person (a person under 18 years of age) includes:
 - endangers a young person or is likely to endanger a young person
 - if repeated against or in relation to a young person would endanger the young person or be likely to endanger the young person
 - involves sexual material relating to young people (including possession of such material)
 - involves sexually explicit images depicting violence against human beings (including possession of such images)
 - is of a sexual nature involving a young person
- A person's conduct endangers a young person if they:
 - harm a young person
 - cause a young person to be harmed
 - put a young person at risk of harm
 - attempt to harm a young person
 - incite another to harm a young person

The full procedures for dealing with allegations against staff can be found in [Keeping Children Safe in Education](#) 2022.

Appendix 6

Useful Contacts in Waltham Forest

<p>Multi-Agency Safeguarding Hub (MASH)</p> <p>Single point of referral for Early Help, Young person Protection and Adults' Safeguarding in Waltham Forest</p>	<p>Phone: 020 8496 2310 Mon-Thurs, 9am-5.15pm and Fri, 9am-5pm Out of Hours: 020 8496 3000 Email: MASHrequests@walthamforest.gov.uk</p> <p>N.B.: If you cannot get through by phone, send an email with your contact details, and you will get a same-day phone response during normal business hours</p>
<p>LADO Team</p> <p>Allegations against staff and volunteers (ASV)</p>	<p>Phone: 020 8496 3646 Email: LADO@walthamforest.gov.uk</p> <p>N.B.: If you cannot get through by phone, send an email with your contact details, and you will get a same-day phone response during normal business hours</p>
<p>Safeguarding in Education Team</p> <p>Consultations / Training / Support (traded service)</p>	<p>Phone: 020 8496 3646 Email: safeguardingineducation@walthamforest.gov.uk</p> <p>N.B.: If you cannot get through by phone, send an email with your contact details, and you will get a phone response within 24 hours during normal business hours</p>
<p>Early Help</p>	<p>Phone: 020 8496 1517 Email: earlyhelp@walthamforest.gov.uk</p>
<p>Virtual School</p>	<p>Phone: 020 8496 1741 Email: virtual.college@walthamforest.gov.uk Head of Virtual School: fay.blyth@walthamforest.gov.uk</p>
<p>Special Educational Needs & Disability (SEND) Service [formerly known as Disability Enablement Service (DES)]</p>	<p>Phone: 020 8496 6503 Email: senteam@walthamforest.gov.uk</p>
<p>Local Safeguarding Children Board (LSCB) Local Safeguarding Partners (LSPs)</p>	<p>Email: strategicpartnerships@walthamforest.gov.uk</p>
<p>Child Death Overview Panel (CDOP) notifications</p>	<p>Phone: 020 8496 3691 Email: CDOP@walthamforest.gov.uk</p>
<p>Female Genital Mutilation (FGM) Community Safety</p>	<p>Refer via MASH. Phone: 020 8496 3281 Email: sylvie.lovell@walthamforest.gov.uk</p>
<p>Prevent Community Safety</p>	<p>Refer via MASH. Phone: 020 8496 3000 Mob: 07816150037</p>

	Email: PREVENT@walthamforest.gov.uk
Gangs Community Safety	Refer via MASH . Email: communitysafety@walthamforest.gov.uk
Adolescent Safeguarding Lead Children's Social Care	Refer via MASH . Email: reanne.turner@walthamforest.gov.uk
Harmful Sexual Behaviour Lead Children's Social Care	Refer via MASH . Email: tracey.goddard@walthamforest.gov.uk Tel: 020 8496 5027 Mob: 0797 476 8433
MARAC / DRM queries	Refer via MASH . MASHrequests@walthamforest.gov.uk
Mental Health First Aid / Public Health	catherine.hutchinson@walthamforest.gov.uk
Private Fostering	Refer via MASH . Email: charlotte.andrews@walthamforest.gov.uk Phone: 020 8496 1235 Mob: 07730 766 429
Violence against women and girls (VAWG) & Domestic Abuse one-stop-shop	Refer via MASH . Email: vawg@walthamforest.gov.uk ; domesticabuseadvice@walthamforest.gov.uk

Appendix 7 - List of convictions to accompany criminal convictions procedure

Aggravated burglary	High	Making off without payment	Medium
Assault - Actual bodily harm (ABH)	High	Manslaughter/ Murder	High
Assault - Common assault	High	Possession of a firearm	High
Assault - Grievous bodily harm GBH)	High	Possession of an offensive weapon	High
Behaviour intended to cause harassment	Medium	Possession of drugs (Class A)	Medium
Breach of restraining order	Medium	Possession of drugs (Class B)	Medium
Burglary	High	Possession of drugs (Class C)	Low
Careless or inconsiderate driving	Medium	Robbery	High
Causing death by dangerous driving	High	Send communication/ article of an indecent/ offensive nature	Medium
Criminal damage	Low	Sexual assault or rape	High
Criminal damage with intent to endanger life	High	Supply of drugs (Class A)	High
Dangerous driving	Low	Supply of drugs (Class B)	High
Drunk & disorderly	Low	Supply of drugs (Class C)	Medium
Fraud	Medium	Theft	Medium
Handling stolen goods (HSG)	Medium	Threats to kill	Medium

Appendix 8 – Criminal convictions risk assessment (NB – this can also be recorded in note form on Pro-Monitor)

Name of student:

Course applied for:

Staff member (s) making decision:

Date convicted	Conviction	Sentence	
Information regarding conviction (circumstances, triggers, reflection on offence, etc):			
	Raw Risk (Low, Medium, High)	Control measures	Residual risk (Low, Medium, High)
Risk to self			
Risk to others			
Risk to College property			
Decision taken:			
Who should this be shared with?			
Signed (staff member) _____	Signed (staff member) _____		
Signed (student) _____	Signed (parent) _____		

Appendix 9 – Fitness to study Risk Assessment (NB – this can also be recorded in note form on Pro-Monitor)

Name of student:

Course applied for:

Staff member (s) making decision:

Information on Fitness to Study			
	Raw Risk (Low, Medium, High)	Control measures	Residual risk (Low, Medium, High)
Risk to self			
Risk to others			
Risk to College property			
Decision taken:			
Who should this be shared with?			
Signed (staff member) _____		Signed (staff member) _____	
Signed (student) _____		Signed (parent/carer) _____	

