

# Safeguarding Policy and Procedure 2025

## Reviewed by:

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Board of **Governors**

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## Section 1 - Policy

### 1. Policy statement and principles

BFMAT has accountability and overall responsibility for the safeguarding of young people and vulnerable adults across its academies. BFMAT assumes a strategic responsibility to ensure compliance at a local level. Each College/Academy has a Safeguarding Policy, overseen by the College/Academy DSL, together with the Senior Leadership Team and the LGB. These Policies will also be reviewed at Trust level by the trustee Safeguarding Leads.

The College will maintain and review an individual Safeguarding Policy, with detailed processes and procedures relevant to each College's local context. This policy is one of a series in the college's integrated safeguarding portfolio. This policy is available on the college website and the staff portal.

"At **Bilborough** College we are committed to safeguarding and promoting the welfare of young people and vulnerable adults and we expect our staff and all those associated with the College to share this commitment."

Our core safeguarding principles are:

- safeguarding is everyone's responsibility.
- the college's responsibility to safeguard and promote the welfare of young people is of paramount importance.
- safer young people make more successful learners.
- policies will be reviewed at least annually unless an incident or new legislation or guidance suggests the need for an interim review.

#### 1.1. Safeguarding statement

We recognise our moral and statutory responsibility to safeguard and promote the welfare of all students. We endeavour to provide a safe and welcoming environment where young people are respected and valued. We are alert to the signs of abuse and neglect and follow our procedures to ensure that young people receive effective support, protection, and justice.

The procedures contained in this policy apply to all staff, volunteers and governors and are consistent with those of the local safeguarding partner arrangements.

##### 1.1.1. Policy principles

- The welfare of the young person is paramount.
- All young people, regardless of age, gender, ability, culture, race, language, religion, or sexual identity, have equal rights to protection.
- All staff have an equal responsibility to act on any suspicion or disclosure that may suggest a young person is at risk of harm.
- All staff will reassure young people that their concerns and disclosures will be taken seriously and that they will be supported and kept safe.
- Students and staff involved in child protection issues will receive appropriate support.

### 1.1.2. Policy aims

- To provide all staff with the necessary information to enable them to meet their child protection responsibilities.
- To ensure consistent good practice.
- To demonstrate the college's commitment regarding child protection to students, parents, and other partners.

#### **Terminology**

**Safeguarding** and promoting the welfare of young people refers to the process of protecting young people from maltreatment whether that is within or outside the home, including online, providing help and support to meet the needs of children as soon as problems emerge, preventing the impairment of mental and physical health or development, ensuring that young people grow up in circumstances consistent with the provision of safe and effective care and taking action to enable all young people to have the best outcomes.

**Child protection** refers to the processes undertaken to protect young people who have been identified as suffering or being at risk of suffering significant harm.

**Staff** refers to all those working for or on behalf of the college, full time, or part time, temporary or permanent, in either a paid or voluntary capacity.

**DSL** refers to the designated safeguarding lead at the college.

**Child or young person** includes everyone under the age of 18.

**Parent** refers to birth parents and other adults who are in a parenting role, for example stepparents, foster carers, and adoptive parents.

## 2. Safeguarding legislation and guidance

The following safeguarding legislation and guidance has been considered when drafting this policy:

- Section 157 of the Education Act 2002 (Independent colleges only, including academies and Free Colleges)
- The Education (Independent College Standards) Regulations 2014 (Independent colleges only, including academies and Free Colleges)
- The Safeguarding Vulnerable Groups Act 2006
- The Teacher Standards 2012
- Working Together to Safeguarding Children 2023
- Working Together: Transitional Guidance 2024
- Working Together to Improve School Attendance 2024
- Keeping Children Safe in Education 2025
- What to do if you're worried a child is being abused 2015.
- The Domestic Abuse Act 2021
- PACE Code C 2019

### 3. Roles and responsibilities

#### Key personnel

The **designated safeguarding lead (DSL)** for child protection is **Michelle Harvey**

Contact details:

email: [michelle.harvey@bilborough.ac.uk](mailto:michelle.harvey@bilborough.ac.uk) tel: 0115 8515000

The **Operational Designated Safeguarding Lead (ODSL)** is **Helen Ginns-Farrow**

Contact details: email [helen.ginns-farrow@bilborough.ac.uk](mailto:helen.ginns-farrow@bilborough.ac.uk) tel: 0115 8515000

The **Deputy Designated Safeguarding Lead (DDSL)** is **Monique Norcliffe**

Contact details: email: [Monique.norcliffe@bilborough.ac.uk](mailto:Monique.norcliffe@bilborough.ac.uk) tel: 0115 851 5000

The **Nominated Safeguarding Governor** is **Chris Hulse, Sharon Jagdev Powell**

Contact details: email: [claire.bailey@bilborough.ac.uk](mailto:claire.bailey@bilborough.ac.uk)

The **principal** is **David Shaw**

Contact details: email: [claire.bailey@bilborough.ac.uk](mailto:claire.bailey@bilborough.ac.uk)

See appendix three for a list of all other safeguarding officers (SO)

All colleges should appoint a member of the senior leadership team to coordinate safeguarding and child protection arrangements.

#### 3.1. The designated safeguarding lead (DSL)

The designated safeguarding lead (DSL) takes **lead responsibility** for safeguarding and child protection (including online safety) in the college. The DSL has the status and authority within the college to carry out the duties of the post, which include:

- ensuring the safeguarding policies are known, understood, and used appropriately by staff, reviewed annually and publicly available.
- advising and supporting staff on child protection and safeguarding matters
- encouraging a culture of listening to young people
- managing safeguarding referrals to children's social care, the police, or other agencies
- liaising with the principal/deputy principal regarding ongoing enquiries under section 47 of the Children Act 1989 and police investigations and be aware of the requirement for young people to have an appropriate adult in relevant circumstances (Appendix five)
- taking part in strategy discussions and inter-agency meetings
- liaising with the "case manager" and the designated officer(s) at the local authority where allegations are made against staff.
- making staff aware of training courses and the latest local safeguarding arrangements available through the local safeguarding partner arrangements
- undergoing training and receiving regular updates to maintain the knowledge and skills required to carry out the role, including Prevent awareness training.

#### 3.2. The operational designated safeguarding lead and the deputy designated safeguarding lead:

The Operational Designated Safeguarding Lead (ODSL) is the operational lead in college daily. They are trained to the same level as the Designated Safeguarding Lead (DSL) and support the DSL with

safeguarding matters as appropriate. Whilst the DSL works at a strategic level daily, they will become directly involved in operational matters where necessary, such as in cases involving allegations against staff. The DSL, ODSL, and Deputy DSL (DDSL) meet weekly to discuss ongoing safeguarding cases, with urgent meetings convened sooner if required. In the absence of the DSL, the ODSL and DDSL carry out those functions necessary to ensure the ongoing safety and protection of students. In the event of the long-term absence of the DSL, the ODSL and DDSL will assume the functions outlined above.

## 4. Good practice guidelines and staff code of conduct

Good practice includes:

- treating all students with respect
- setting a good example by conducting ourselves appropriately
- involving students in decisions that affect them.
- encouraging positive, respectful, and safe behaviour among students
- being a good listener
- being alert to changes in students' behaviour and to signs of abuse, neglect, and exploitation
- recognising that challenging behaviour may be an indicator of abuse.
- reading and understanding the college's safeguarding policy, code of conduct and guidance documents on wider safeguarding issues
- being aware that the personal and family circumstances and lifestyles of some students lead to an increased risk of abuse.
- referring all concerns about a student's safety and welfare to the DSL, or, if necessary, directly to police or children's social care.

## 5. 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.

Staff 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.

**The BFMAT code of conduct and the college's professional boundaries with former students' policy sets out our expectations of staff.**

## 6. Young people who may be particularly vulnerable

Some young people may have an increased risk of abuse. Many factors can contribute to an increase in risk, including prejudice and discrimination, isolation, social exclusion, communication issues and reluctance on the part of some adults to accept that abuse can occur. To ensure that our students receive equal protection, we will give special consideration to young people who are:



- living away from home or in temporary accommodation
- living in chaotic and unsupportive home situations
- living transient lifestyles
- affected by parental substance misuse, domestic abuse, or parental mental health needs.
- vulnerable to being bullied or engaging in bullying.
- vulnerable to discrimination and maltreatment on the grounds of race, ethnicity, religion, disability, or sexuality
- do not have English as a first language.
- at risk of sexual exploitation, female genital mutilation, forced marriage or being drawn into extremism.
- at risk of being permanently excluded from college
- has a parent or carer in custody, or is affected by parental offending, which may further acknowledge arrests and not imprisonment, i.e. taken into custody after a domestic incident, but not formally charged.

This list provides examples of additionally vulnerable groups and is not exhaustive. Special consideration includes the provision of safeguarding information and resources in community languages and accessible formats for young people with communication needs.

## 7. Young people with special educational needs and disabilities

Young people with special educational needs (SEN) and disabilities can face additional safeguarding challenges. Additional barriers can exist when recognising abuse, neglect, and exploitation 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.

## 8. Young people who are absent from education

Attendance, absence, and exclusions are closely monitored. A young person being absent from education for reasons that are ***unexplained and/or prolonged/repeated/persistent absences from education***. **NB:** this includes half days - it doesn't have to be a full day absent, and a young person going missing from education is a potential indicator of abuse and neglect, including sexual abuse or exploitation, child criminal exploitation or mental health problems. (*Keeping Children Safe in Education (DfE, 2024)*). The DSL will monitor unauthorised absence and take appropriate action for young people who are absent or go missing on repeated occasions and/or are missing for periods

during the college day. Staff must also be alert to signs of young people at risk of travelling to conflict zones, female genital mutilation and forced marriage. Mental health

Colleges have an important role to play in supporting the mental health and wellbeing of their students.

All staff are aware that mental health problems can be an indicator that a young person has suffered or is at risk of suffering abuse, neglect, or exploitation. Staff are also aware that where young people have suffered adverse childhood experiences those experiences can impact on their mental health, behaviour, and education.

Where staff are concerned that a young person's mental health is also a safeguarding concern, they will discuss it with the senior mental health lead (DSL) or deputy mental health lead (DDSL).

## 9. Mental health

Colleges have an important role to play in supporting the mental health and wellbeing of their students.

All staff are aware that mental health problems can be an indicator that a young person has suffered or is at risk of suffering abuse, neglect, or exploitation. Staff are also aware that where young people have suffered adverse childhood experiences those experiences can impact on their mental health, behaviour, and education.

Where staff are concerned that a young person's mental health is also a safeguarding concern, they will discuss it with the safeguarding team.

## 10. Young people who are lesbian, gay, bisexual, or gender questioning

A child or young person being lesbian, gay, or bisexual is not in itself an inherent risk factor for harm, however, they can sometimes be targeted by other children. In some cases, a child who is perceived by other children to be lesbian, gay, or bisexual (whether they are or not) can be just as vulnerable as children who are.

However, the Cass review identified that caution is necessary for children questioning their gender as there remain many unknowns about the impact of social transition and children may well have wider vulnerabilities, including having complex mental health and psychosocial needs, and in some cases additional diagnoses of autism spectrum disorder and/or attention deficit hyperactivity disorder.

It recommended that when families/carers are making decisions about support for gender questioning children, they should be encouraged to seek clinical help and advice. When parents are supporting pre-pubertal children, clinical services should ensure that they can be seen as early as possible by a clinical professional with relevant experience. The wider vulnerabilities of gender questioning children should be explored such as mental health and SEND.

As such, when supporting a gender questioning child, schools should take a cautious approach and consider the broad range of their individual needs, in partnership with the child's parents

(other than in the exceptionally rare circumstances where involving parents would constitute a significant risk of harm to the child), including any clinical advice that is available and how to address wider vulnerabilities such as the risk of bullying. Schools should refer to our Guidance for Schools and Colleges in relation to Gender Questioning Children, when deciding how to proceed.

Risks can be compounded where children lack trusted adults with whom they can be open. It is therefore vital that staff endeavour to reduce the additional barriers faced and create a culture where they can speak out or share their concerns with members of staff

KCSIE (DfE 2024) advise that Families and carers should seek clinical help and advice and

## 11. Whistleblowing if you have concerns about a colleague

Staff who are concerned about the conduct of a colleague towards a student are undoubtedly placed in a very difficult situation. They may worry that they have misunderstood the situation, and they will wonder whether a report could jeopardise their colleague's career. All staff must remember that the welfare of the young person is paramount. The college's confidential reporting code and policy (Whistleblowing), the low-level concerns policy and the low-level electronic reporting tool (**staff portal**) enables staff to raise concerns or allegations, initially in confidence and for a sensitive enquiry to take place.

All concerns of poor practice or possible child abuse by colleagues should be reported to the principal or deputy. Complaints about the principal or deputy should be reported to the chair of governors, chair of the management committee or proprietor.

Staff may also report their concerns directly to young people's social care or the police if they believe direct reporting is necessary to secure action.

## 12. Safeguarding concerns and allegations made about staff, supply staff, contractors, and volunteers.

When a safeguarding concern or allegation is made about a member of staff, including supply staff, contractors, or volunteers, or relates to an incident that happened when an individual or organisation was using our premises for the purposes of running activities for young people our set procedures must be followed. The full procedures for dealing with allegations against staff and managing low level concerns raised about staff can be found in *Keeping Children Safe in Education* (DfE, 2024) and in [BFMAT - Managing Allegations Against Staff.pdf](#) and the [low level concerns policy](#) for safeguarding concerns and allegations made about staff, supply staff, contractors, and volunteers.

Safeguarding concerns or allegations made about staff who no longer work at the college, or historical allegations will be reported to the police.

## 13. Staff and governor/trustee training

It is important that all staff receive training to enable them to recognise the possible signs of abuse, neglect and exploitation, online safety (including an understanding of the expectations, applicable

roles and responsibilities for filtering and monitoring) and to know what to do if they have a concern. All staff sign an annual declaration to say that they have read and understood safeguarding policies (see appendix six for a copy of the declaration)

New staff receive a briefing during their induction, which includes the college's safeguarding policy, staff code of conduct, [low level concerns policy](#) and the reporting and recording arrangements, details for the DSL/ODSL/DDSL and other policies and training. All staff, including the DSL, principal, deputy principal and governors will receive training that is regularly updated. All staff will also receive safeguarding and child protection updates via email, safeguarding bulletins, and staff briefings/meetings throughout the year.

Our governors/trustees receive appropriate safeguarding and child protection (including online safety and an understanding of the expectations, applicable roles and responsibilities for filtering and monitoring) training at induction which equips them with the knowledge to provide strategic challenge to test and assure themselves that there is an effective whole trust approach to safeguarding. This training is updated at least annually.

Our safeguarding governors receive additional training to empower them to support and challenge the Designated Safeguarding Lead and support the delivery of high-quality safeguarding locally and across the trust.

## 14. Safer recruitment

Our college complies with the requirements of Keeping Children Safe in Education (DfE 2024) and the local safeguarding partner arrangements by carrying out the required checks and verifying the applicant's identity, qualifications, and work history. The college's Staff Recruitment and Selection (including Safer Recruitment Requirements) policy and procedures set out the process in full and can be found (available on the staff portal for 'The People Team'). At least one member of each recruitment panel will have attended safer recruitment training.

The college obtains written confirmation from supply agencies or third-party organisations that supply staff or other individuals who may work in the college have been appropriately checked and are suitable to work with young people.

Trainee teachers will be checked either by the college or by the training provider, from whom written confirmation will be obtained confirming their suitability to work with young people.

The college maintains a single central record of recruitment checks undertaken.

### 14.1. Volunteers

Volunteers, including governors will undergo checks commensurate with their work in the college, their contact with students and the supervision provided to them. Under no circumstances will a volunteer who has not been appropriately checked be left unsupervised.

## 14.2. Letting or hiring premises for non-college activity

**Bilborough** College has lettings and hiring procedures in place. This includes a copy of their safeguarding policy. Our contract with them states how failure to comply with safeguarding would lead to a termination of the contact.

## 14.3. Contractors

The college checks the identity of all contractors working on site and requests DBS with barred list checks where required by statutory guidance. Contractors who have not undergone checks will not be allowed to work unsupervised during the college day.

## 15. Site security

Visitors to the college, including contractors, are asked to sign in and are given a badge, which confirms they have permission to be on site. All visitors are expected to observe the college's safeguarding and health and safety regulations. The principal/deputy principal/DSL will exercise professional judgement in determining whether any visitor should be escorted or supervised while on site.

## 16. 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. Where extended college activities are provided by and managed by the college, our own safeguarding policy and procedures apply. If other organisations provide services or activities on our site on behalf of our college, we will check that they have appropriate procedures in place, including safer recruitment procedures.

When our students attend off-site activities, including day and residential visits and work-related activities, we will check that effective safeguarding arrangements are in place.

## 17. Staff/student online relationships

The college provides advice to staff regarding their personal online activity and has strict rules regarding online contact and electronic communication with students. Staff found to be in breach of these rules may be subject to disciplinary action or child protection investigation (*please see staff portal, safeguarding for, **Bilborough** College Online Safety Policy, July 2024, for college's advice*)

# Section 2 - Procedures

## 18. Safeguarding procedures

### 18.1. Recognising abuse, neglect and exploitation

To ensure that our students are protected from harm, we need to understand what types of behaviour constitute abuse, neglect, and exploitation.

Abuse, neglect and exploitation are forms of maltreatment. Somebody may abuse, neglect, and exploit a young person by inflicting harm, for example by hitting them, or by failing to act to prevent harm, for example by leaving a small child home alone.

Abuse may be committed by adult men or women and by other young people.

Keeping Children Safe in Education (DfE 2024) refers to four categories of abuse. These are set out at Appendix One along with indicators of abuse.

### 18.2. Bullying

- While bullying between young people is not a separate category of abuse, neglect, and exploitation, it is a very serious issue that can cause anxiety and distress. All incidences of bullying, including cyber-bullying and prejudice-based bullying should be reported and will be managed through our Protection for Students from Child on Child Abuse (Bullying and Harassment) at College Policy 2023, (available on the staff portal, safeguarding)

### 18.3. Taking action

**Any child, in any family in any college could become a victim of abuse. Staff should always maintain an attitude of “it could happen here”.** Key points for staff to remember for acting are:

- in an emergency take the action necessary to help the young person (including calling 999)
- report your concern as soon as possible to the DSL, definitely by the end of the day.
- do not start your own investigation.
- share information on a need-to-know basis only – do not discuss the issue with colleagues, friends, or family.
- the DSL/ODSL/DDSL/SO will complete a record of concern on a S Form
- seek support for yourself if you are distressed.

### 18.4. If you are concerned about a student’s welfare

There will be occasions when staff may suspect that a student may be at risk. The student’s behaviour may have changed, their artwork could be bizarre, they may write stories or poetry that reveal confusion or distress, or physical signs may have been noticed. In these circumstances, staff will try to give the student the opportunity to talk and ask if they are OK or if they can help in any way.

Staff should speak to a member of the safeguarding team so that these concerns can be recorded early on a S Form. If the student does reveal that they are being harmed, staff should follow the advice below. Following an initial conversation with the student, if the member of staff has concerns, they should discuss their concerns with the DSL.

Staff are aware that young people may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. Young people may feel embarrassed, humiliated, or being threatened, which could be due to their vulnerability, disability and/or sexual orientation or language barriers. This will not prevent our staff from having a professional curiosity and speaking to our DSL if they have concerns about a young person.

### 18.5. If a student discloses to you

It takes a lot of courage for a young person to disclose that they are being abused. They may feel ashamed, particularly if the abuse is sexual; their abuser may have threatened what will happen if they tell; they may have lost all trust in adults; or they may believe, or have been told, that the abuse is their own fault. Sometimes they may not be aware that what is happening is abusive. If a student talks to a member of staff about any risks to their safety or wellbeing, **the staff member will, at the appropriate time, let the student know that to help them they must pass the information on to the DSL.** The point at which they tell the student this is a matter for professional judgement. During their conversations with the students, staff will:

- allow them to speak freely.
- remain calm and not overreact.
- give reassuring nods or words of comfort – ‘I’m so sorry this has happened’, ‘I want to help’, ‘This isn’t your fault’, ‘You are doing the right thing in talking to me’.
- not be afraid of silences.
- **under no circumstances** ask investigative questions – such as how many times this has happened, whether it happens to siblings, or what does the student’s mother think about it.
- not automatically offer any physical touch as comfort
- avoid admonishing the young person for not disclosing earlier. Saying things such as ‘I do wish you had told me about this when it started’ may be interpreted by the young person to mean that they have done something wrong.
- tell the student what will happen next.
- report verbally to the DSL even if the young person has promised to do it by themselves.
- share your notes with the DSL as soon as possible, so that they have an accurate account of what was disclosed.
- DSL will complete a s form.
- seek support if they feel distressed.

### 18.6. Notifying parents

The college will normally seek to discuss any concerns about a student with their parents. This must be handled sensitively, and the DSL will contact 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 first be sought from young people’s social care and/or the police before parents are contacted.

## 19. Confidentiality and sharing information

All staff will understand that safeguarding issues warrant a high level of confidentiality. Staff should only discuss concerns with the DSL/ODSL/DDSL, principal, deputy principal or chair of governors (depending on who is the subject of the concern). That person will then decide who else needs to have the information and they will disseminate it on a ‘need-to-know’ basis.

Following several cases where senior leaders in college had failed to act upon concerns raised by staff, *Keeping Children Safe in Education (2024)* emphasises that **any** member of staff can contact children's social care if they are concerned about a young person.

Safeguarding information will be stored and handled in line with our Retention and Destruction Policy.

Information sharing will take place in a timely and secure manner and where:

it is necessary and proportionate to do so; and the information to be shared is relevant, adequate, and accurate.

Information sharing decisions will be recorded, whether or not the decision is taken to share.

All electronic safeguarding information is password protected (CEDAR) and only made available to relevant individuals.

Safeguarding information will be stored separately from the student's college file and the college system will be 'tagged' on the students CEDAR profile page to indicate that separate safeguarding information is held.

The DSL 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 DSL may share information *without* consent and will record the reason for not obtaining consent.

If any member of staff receives a request from a student or parent to see safeguarding records, they will refer the request to the data protection officer or DSL.

The UK GDPR and the Data Protection Act 2018 do not prevent college staff from sharing information with relevant agencies, where that information may help to protect a young person.

The college's data protection and cybersecurity policy are available to parents and students on the college website.

## 20. Referral to children's social care

The DSL/ODSL/DDSL will make a referral to children's social care if it is believed that a student is suffering or is at risk of suffering significant harm. The student (subject to their age and understanding) and the parents will be told that a referral is being made, unless to do so would increase the risk to the child.

Any member of staff may make a direct referral to children's social care if they genuinely believe independent action is necessary to protect a child.

## 21. Reporting directly to child protection agencies

Staff should follow the reporting procedures outlined in this policy. However, they may also share information directly with children's social care, police, or the NSPCC if:

- the situation is an emergency and the designated safeguarding lead, their deputy, the principal/deputy principal and the chair of governors are all unavailable
- they are convinced that a direct report is the only way to ensure the student's safety.
- for any other reason they make a judgement that direct referral is in the best interests of the young person.



## 22. Child-on-child abuse

Children may be harmed by other children or young people. Staff will be aware of the harm caused by bullying and will use the college's anti-bullying procedures where necessary. However, all staff recognise that children can abuse other children and young people and should be clear about the college's policy and procedures regarding child-on-child abuse. Staff will maintain an attitude of 'it could happen here'. All child-on-child abuse is unacceptable and will be taken seriously.

Child-on-child abuse can take many forms, including:

- **physical abuse** such as shaking, biting, hitting, kicking or hair pulling.
- **bullying**, including cyberbullying, prejudice-based and discriminatory bullying.
- **sexual violence and sexual harassment** such as inappropriate sexual language, touching, sexual assault or rape.
- **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, AI generated sexual images or videos)** including pressuring another person to send sexual imagery or video content.
- **abuse in intimate personal relationships between peers (also known as teenage relationship abuse)** - such as a pattern of actual or threatened acts of physical, sexual, or emotional abuse.
- **upskirting** – taking a picture under a person's clothing without their permission for the purposes of sexual gratification or to cause humiliation, distress, or alarm.
- **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.
- **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, in particular prejudices linked to disabilities, special educational needs, ethnic, cultural, and religious backgrounds, gender, and sexual identity.

Abuse is abuse and should never be tolerated or passed off as 'banter', 'just having a laugh', 'part of growing up' or 'boys being boys'. Tolerance of such behaviours can lead to a culture of unacceptable behaviours and an unsafe environment for young people.

Different gender issues can be prevalent when dealing with child-on-child abuse, for example girls being sexually touched/assaulted or boys being subject to initiation/hazing type violence. However, all staff recognise that it is more likely that girls will be victims of child-on-child abuse and boys are more likely to be the perpetrators.

Staff recognise that even if there are no reported cases of child-on-child abuse, such abuse may still be taking place but simply not being reported.

### 22.1. Minimising risk

At our college, we take the following steps to minimise or prevent the risk of child-on-child abuse.

- An open and honest environment where young people feel safe to share information about anything that is upsetting or worrying them.
- Student induction is used to provide a moral framework outlining acceptable behaviour and stressing the effects of bullying.

- Skills and progressions sessions are used to reinforce the message.
- Staff will endeavour always to create surroundings where everyone feels confident and at ease in college.
- We will ensure that the college is well supervised, especially in areas where young people might be vulnerable.

## 22.2. Managing allegations of child-on-child abuse

Staff should pass all allegations of child-on-child abuse to the DSL/ODSL/DDSL immediately. They will then be investigated and dealt with as follows.

- **Information gathering** – young people, staff and witnesses will be spoken with as soon as possible to gather relevant information quickly to understand the situation and assess whether there was intent to cause harm.
- **Decide on action** – if it is believed that any young person is at risk of significant harm, a referral will be made to children’s social care. The DSL will then work with children’s social care to decide on next steps, which may include contacting the police.
- **Inform parents** - as with other concerns of abuse, the college will normally seek to discuss concerns about a student with parents. Our focus is the safety and wellbeing of the student and so if the college believes that notifying parents could increase the risk to the young person or exacerbate the problem, advice will first be sought from children’s social care and/or the police before parents are contacted.
- **Record** – all concerns, discussions and decisions made, and the reasons for those decisions, will be recorded on a S Form. The record will include a clear and comprehensive summary of the concern, details of how the concern was followed up and resolved, and a note of the action taken, decisions reached and the outcome.

Young people can report allegations or concerns of child-on-child abuse to any staff member and that staff member will pass on the allegation to the DSL/ODSL/DDSL in accordance with this policy. To ensure young people can report their concerns easily, the college has the following system in place for young people to confidently report abuse:

- Whisper, our confidential reporting tool, with the option to remain anonymous.
- Speak to a member of the safeguarding team, located in the student support area.
- Speak to another trusted adult in college.

Where allegations of sexual violence or sexual harassment are made, the college will act in accordance with the guidance set out in *Keeping Children Safe in Education (2024)*

## 22.3. Supporting those involved

Our staff reassure all victims that they are being taken seriously, regardless of how long it has taken them to come forward, and that they will be supported and kept safe. Our staff will never give a victim the impression that they are creating a problem by reporting sexual violence or sexual harassment, nor will victims be made to feel ashamed for making a report.

Abuse that occurs online or outside of college will not be downplayed and will be treated equally seriously. We recognise that sexual violence and sexual harassment occurring online can introduce a number of complex factors. Amongst other things, this can include widespread abuse or harm across a number of social media platforms that leads to repeat victimisation.

The support required for the student who has been harmed will depend on their circumstance and the nature of the abuse. Support could include counselling, mentoring, the support of family and friends and/or support with improving peer relationships or restorative justice work.

Support may also be required for the student that harmed. We will seek to understand why the student acted in this way and consider what support may be required to help the student and/or change behaviours. Once those needs have been met, the consequences for the harm caused or intended will be addressed.

## 23. Serious violence

All staff are made aware of indicators that young people are at risk from or are involved with serious violent crime. These 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.

All staff are made aware of the range of risk factors which increase the likelihood of involvement in serious violence, such as being male, having been frequently absent or permanently excluded from college, having experienced child maltreatment and having been involved in offending, such as theft or robbery.

## 24. Child criminal exploitation (CCE) and child sexual exploitation (CSE)

Both CCE and CSE are forms of abuse that occur where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a young person into taking part in sexual or criminal activity in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. This power imbalance can be due to a range of factors, including age, gender sexual identity, cognitive ability, physical strength, status, and access to economic or other resources.

The college includes the risks of criminal exploitation and sexual exploitation in the Skills and Progression sessions, as well as opportunities across the curriculum. A common feature of such exploitation is that the young person often doesn't recognise the coercive nature of the relationship and doesn't see themselves as a victim. The young person may initially resent what they perceive as interference by staff, but staff must act on their concerns, as they would for any other type of abuse.

### 24.1. Child Sexual Exploitation (CSE)

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

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

CSE can affect any young person, who has been coerced into engaging in sexual activities. This includes 16- and 17-year-olds who can legally consent to have sex. Some young people may not realise they are being exploited e.g. they believe they are in a genuine romantic relationship.

Children and young people are often unwittingly drawn into sexual exploitation through the offer of friendship and care, gifts, drugs, and alcohol, and sometimes accommodation. 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 child trafficking.

All staff are made aware of the indicators of sexual exploitation which, as well as including the indicators set out under CCE below, can also include having older boyfriends and suffering sexually transmitted infections or becoming pregnant. All concerns are reported immediately to the DSL.

#### 24.2. Child Criminal Exploitation (CCE)

CCE can include young people being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting, or pickpocketing, being forced, or manipulated into committing vehicle crime or threatening/committing serious violence to others.

Young people can become trapped by this exploitation as perpetrators can threaten victims (and their families) with violence or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or carry a knife for a sense of protection.

Young people involved in criminal exploitation often commit crimes themselves. They may still have been criminally exploited even if the activity appears to be something they have agreed or consented to.

It is important to note that the experience of girls who are criminally exploited can be very different to that of boys and both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

All staff are made aware of indicators that young people are at risk from or experiencing criminal exploitation. The main indicator can include young people who:

- appear with unexplained gifts or new possessions.
- associate with other young people involved in exploitation.
- suffer from changes in emotional well-being.
- misuse drugs or alcohol.
- go missing for periods of time or regularly return home late.
- regularly miss college or do not take part in education.

#### 24.3. County lines

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs around the country using dedicated mobile phone lines. Children, young people, and

vulnerable adults are exploited to move, store, and sell drugs and money, with offenders often using coercion, intimidation, violence, and weapons to ensure compliance of victims.

County lines exploitation can occur where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a young person. This power imbalance can be due to the same range of factors set out under CCE, above.

Young people can be targeted and recruited into county lines in a number of locations, including colleges. Indicators of county lines include those indicators set out under CCE, above, with the main indicator being missing episodes from home and/or college. Additional specific indicators that may be present where a young person is criminally exploited include young people who:

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

## 25. Online safety

As colleges increasingly work online, it is essential that young people are safeguarded from potentially harmful and inappropriate material. The use of technology has become a significant component of many safeguarding issues, such as child sexual exploitation, radicalisation, and sexual predation.

The DSL takes lead responsibility for safeguarding and online safety, which includes overseeing and acting on:

- filtering and monitoring reports
- safeguarding concerns
- checks to filtering and monitoring systems

Our filtering and monitoring provider is Lightspeed, they provide appropriate and effective filters and monitoring systems. Filtering and monitoring are in place to block harmful and inappropriate content by managing the content available to students, who can monitor the personal conduct of our students online. We take care to ensure that these systems do not unreasonably impact on teaching and learning, and staff have been identified and assigned suitable roles and responsibilities to manage these systems. We also have effective monitoring strategies in place to meet the safeguarding needs of our students, including filtering and monitoring approaches that cover generative AI to prevent access to harmful and inappropriate content. Our filtering and monitoring systems are tested at regular intervals and reviewed annually to ensure their effectiveness.

We tell parents and carers what filtering and monitoring systems we use, so they can understand how we work to keep our young people safe.

We have also ensured that appropriate level of security protection procedures is in place to safeguard our systems, staff and learners. We review the effectiveness of these procedures periodically to keep up with evolving cyber-crime technologies, utilising <https://www.gov.uk/guidance/plan-technology-for-your-school> to self-assess against the filtering and monitoring standards and receive personalised recommendations on how to meet these.

Online safety risks can be categorised into four areas of risk:

- **content** - being exposed to illegal, inappropriate, or harmful content such as pornography, fake news, racism, misogyny, self-harm, suicide, radicalisation, and extremism, misinformation, disinformation (including fake news) and conspiracy theories.
- **contact** - being subjected to harmful online interaction with other users such as peer to peer pressure and adults posing as young people or young adults to groom or exploit young people for sexual, criminal, financial or other purposes.
- **conduct** - personal online behaviour that increases the likelihood of, or causes, harm such as making, sending, and receiving explicit images, sharing other explicit images and online bullying.
- **commerce** - risks such as online gambling, inappropriate advertising, phishing, or financial scams. If any of our students or staff are at risk, we will report this to the Anti-Phishing Working Group (<https://apwg.org/>)

All staff are aware of these risk areas and should report any concerns to the DSL/ODSL/DDSL.

## 26. Sharing nudes and semi nudes

Sharing photos, videos and live streams online is part of daily life for many children and young people, enabling them to share their experiences, connect with friends and record their lives. Sharing nudes and semi-nudes means the sending or posting online of nude or semi-nude images, videos, or live streams by young people under the age of 18. This could be via social media, gaming platforms, chat apps or forums, or done offline between devices via services like Apple's AirDrop.

The term 'nudes' is used as it is most commonly recognised by young people and more appropriately covers all types of image sharing incidents. Alternative terms used by children and young people may include 'dick pics' or 'pics'. Other terms used in education include 'sexting', youth produced sexual imagery' and 'youth involved sexual imagery'.

The motivations for taking and sharing nudes and semi-nudes are not always sexually or criminally motivated. Such images may be created and shared consensually by young people who are in relationships, as well as between those who are not in a relationship. It is also possible for a young person in a consensual relationship to be coerced into sharing an image with their partner.

Incidents may also occur where:

- young people find nudes and semi-nudes online and share them claiming to be from a peer.
- young people digitally manipulate an image of a young person into an existing nude online.

- images created or shared are used to abuse peers e.g. by selling images online or obtaining images to share more widely without consent to publicly shame.

All incidents involving youth produced sexual imagery will be responded to as follows:

The incident will be referred to the DSL immediately and the DSL will hold an initial review meeting with appropriate staff. If appropriate, there will be subsequent interviews with the young people involved.

- Parents 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.
- At any point in the process, if there is a concern 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 immediately in accordance with this policy.

In some instances, it may be necessary to refer the matter to the police. Once a report is made to the police, the report must be recorded, and the police will investigate. This may include seizure of devices and interviews with the young people involved.

The UK Council for Internet Safety updated its advice for managing incidences of sharing nudes and semi-nudes in December 2020 – [UKCIS advice 2020](#). The college will have regard to this advice when managing these issues.

## 27. Domestic abuse

The Domestic Abuse Act 2021 introduces a legal definition of domestic abuse and recognises the impact of domestic abuse on young people if they see, hear, or experience the effects of abuse.

Domestic abuse is 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. It includes people who have been or are married, are or have been civil partners, have agreed to marry one another or each have or have had a parental relationship in relation to the same young person. It can include psychological, physical, sexual, financial, economic, and emotional abuse.

Anyone can be a victim of domestic abuse, regardless of sexual identity, age, ethnicity, socioeconomic status, sexuality or background and domestic abuse can take place inside or outside of the home. This means young people can also be victims of domestic abuse.

Any child can witness and be adversely affected by domestic abuse in their home life. Experiencing domestic abuse can have a serious emotional and psychological impact on young people, and in some cases, a young person may blame themselves for the abuse or may have had to leave the family home as a result.

Where police have been called to a domestic violence incident where young people are in the household and experienced that incident, the police will inform the DSL. This ensures that the college has up to date safeguarding information about the young person.



All staff are aware of the impact domestic violence can have on a young person. If any of our staff are concerned that a young person has witnessed domestic abuse, they will report their concerns immediately to the DSL.

## 28. Honour-based abuse

'Honour-based' abuse (HBA) encompasses crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing. All forms of HBV are abuse.

Abuse committed in the context of preserving 'honour' often involves a wider network of family or community pressure and can include multiple perpetrators. Staff and the DSL are aware of this dynamic and will consider it when deciding what safeguarding action to take.

FGM is the collective name given to a range of procedures involving the partial or total removal of external female genitalia for non-medical reasons. In England, Wales and Northern Ireland, the practice is a criminal offence under the Female Genital Mutilation Act 2003. The practice can cause intense pain and distress and long-term health consequences, including difficulties in childbirth.

FGM is carried out on girls of any age, from young babies 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.

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 and abuse.

Forced marriage is illegal. It is also illegal to carry out any conduct whose purpose is to cause a young person to marry before their eighteenth birthday, even if violence, threats, or another form of coercion are not used. As with the existing forced marriage law, this applies to non-binding, unofficial 'marriages' as well as legal marriages.

Young people may be married at a very young age, and well below the age of consent in England. College staff receive training and should be particularly alert to suspicions or concerns raised by a student about being taken abroad and not be allowed to return to England.

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.

## 29. Radicalisation and extremism

The government defines extremism as vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.



Some young people are at risk of being radicalised: adopting beliefs and engaging in activities which are harmful, criminal, or dangerous. Islamic extremism is the most widely publicised form and colleges should also remain alert to the risk of radicalisation into white supremacy extremism.

College staff receive training to help to identify signs of extremism. Opportunities are provided in the curriculum to enable students to discuss issues of religion, ethnicity and culture and the college follows the DfE advice Promoting fundamental British Values as part of SMCS (spiritual, moral, social, and cultural education) in schools (2014).

[Guidance for schools and colleges British Values](#)

### 30. Private fostering arrangements

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 aged under 18 if the young person is disabled. By law, a parent, private foster carer, or other persons involved in making a private fostering arrangement must notify children's services as soon as possible.

Where a member of staff becomes aware that a student may be in a private fostering arrangement, they will raise this with the DSL and the college should notify the local authority of the circumstances.

### 31. Related safeguarding portfolio policies

This policy should be read alongside our other safeguarding policies, which are set out in Appendix Two.

#### 31.1. Looked after children

The most common reason for young people becoming looked after is because of abuse, neglect, or exploitation. The college ensures that staff have the necessary skills and understanding to keep looked after children safe. Appropriate staff have information about a young person's looked after legal status and care arrangements, including the level of authority delegated to the carer by the authority looking after the young person. The designated person for looked after children and the DSL have details of the young person's social worker and the name and contact details of the local authority's virtual head for young people in care.

#### 31.2. Young people who have a social worker

Young people may need a social worker due to safeguarding or welfare needs. Local authorities will share this information with us, and the DSL/ODSL/DDSL/SO will hold and use this information to inform decisions about safeguarding and promoting the young person's welfare.

#### 31.3. Work experience

The college has detailed procedures to safeguard students undertaking work experience, including arrangements for checking people who provide placements and supervise students on work experience which are in accordance with the guidance in *Keeping Children Safe in Education*

(2024). These procedures are kept with the work experience coordinator, who has received safeguarding training.

#### 31.4. Young people staying with host families

The college may arrange for students to stay with a host family during a foreign exchange trip. Some overseas students may reside with host families during college terms, and we will work with the local authority, schools and colleges involved and risk assess using our own safeguarding data, to check that such arrangements are safe and suitable.

It is not possible for colleges to obtain criminal record information from the DBS about adults abroad. Where students stay with families abroad, we will agree with partner colleges a shared understanding of the arrangements in place. Staff will use their professional judgement to satisfy themselves that the arrangements are appropriate to safeguard the students, which will include ensuring students understand who to contact should an emergency occur, or a situation arise which makes them feel uncomfortable. We will also make parents aware of these arrangements.

The college follows the guidance in Annex D of *Keeping Children Safe in Education (2024)* to ensure that hosting arrangements are as safe as possible.

#### 31.5. Young people's homes

Research has shown that young people can be particularly vulnerable in residential settings. All residential homes comply with the National Minimum Standards for their setting and are appropriately inspected. However, if you have concerns regarding signs of abuse in such settings, you should report your concerns to DSL/ODSL/DDSL.

## Appendices

### Appendix One

#### Categories of abuse

##### Physical abuse

Physical abuse is a form of abuse which may involve hitting, shaking, throwing, poisoning, burning, or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child (this used to be called Munchausen's Syndrome by Proxy but is now more usually referred to as fabricated or induced illness).

##### Emotional abuse

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on young people. These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyber bullying), 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 child, although it may occur alone.

##### Sexual abuse

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

##### Neglect

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

- provide adequate food, clothing, and shelter (including exclusion from home or abandonment).

- protect a child from physical and emotional harm or danger.
- ensure adequate supervision (including the use of inadequate caregivers); or
- ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

### Exploitation

Exploitation abuse might not just occur in the home, it may also occur outside of the home environment, even online. Exploitation can include instances where a child or young person may be groomed to become involved in sexual or criminal activity. This is a significant distinction where previously they may have been viewed as an offender instead of a victim.

### Indicators of abuse

Physical signs define some types of abuse, for example, bruising, bleeding, or broken bones resulting from physical or sexual abuse, or injuries sustained while a child has been inadequately supervised. The identification of physical signs is complicated, as young people may go to great lengths to hide injuries, often because they are ashamed or embarrassed, or their abuser has threatened further violence or trauma if they 'tell'. It is also quite difficult for anyone without medical training to categorise injuries into accidental or deliberate with any degree of certainty. For these reasons, it is vital that staff are also aware of the range of behavioural indicators of abuse and report any concerns to the designated safeguarding lead.

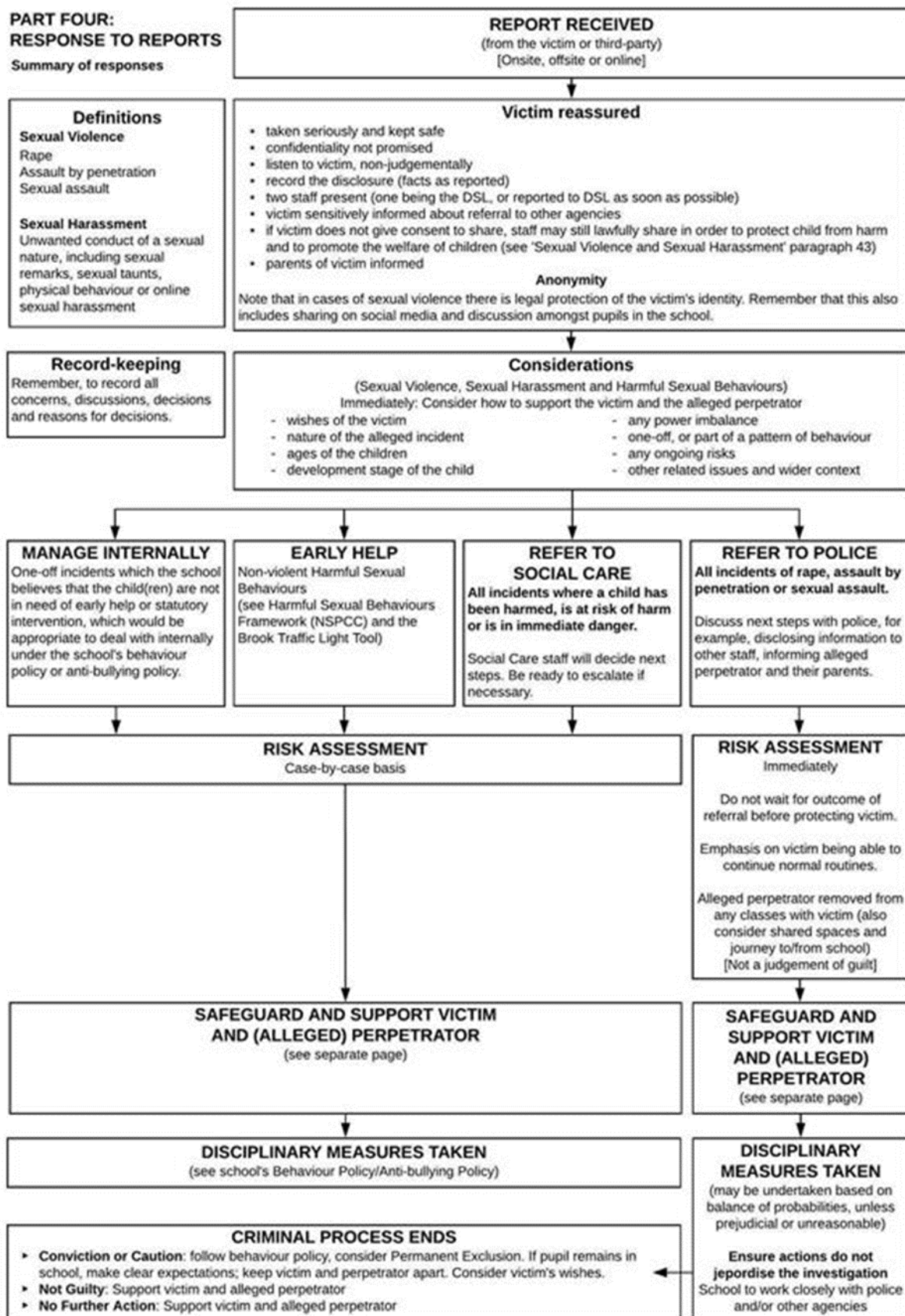
**It is the responsibility of staff to report their concerns. It is not their responsibility to investigate or decide whether a young person has been abused.**

A young person who is being abused, neglected, or exploited may:

- have bruises, bleeding, burns, fractures, or other injuries.
- show signs of pain or discomfort
- keep arms and legs covered, even in warm weather.
- be concerned about changing for PE or swimming.
- look unkempt and uncared for
- change their eating habits.
- have difficulty in making or sustaining friendships.
- appear fearful.
- be reckless with their own or other's safety.
- self-harm
- frequently miss college, arrive late, or leave the college for part of the day.
- show signs of not wanting to go home.
- display a change in behaviour – from quiet to aggressive, or happy-go-lucky to withdrawn.
- challenge authority.
- become disinterested in their college work.
- be constantly tired or preoccupied.
- be wary of physical contact.
- be involved in, or particularly knowledgeable about drugs or alcohol.
- display sexual knowledge or behaviour beyond that normally expected for their age.
- acquire gifts such as money or a mobile phone from new 'friends'.

Individual indicators will rarely, in isolation, provide conclusive evidence of abuse. They should be viewed as part of a jigsaw, and each small piece of information will help the DSP to decide how to proceed.

## Reporting Harmful Sexual Behaviours – Bilborough College



Source:

## Appendix Two

Related safeguarding policies, procedures and guidance

[BFMAT - AI for Students and Parents.pdf](#)

[BFMAT - AI Staff Policy.pdf](#)

[Bilborough Online Safety Policy July 2024](#)

[Protection for Students from Child on Child Abuse \(Bullying and Harassment\) at College Policy 2023](#)

[Student Disciplinary Policy 2022](#)

[Physical intervention and the use of reasonable force 2023](#)

[BF MAT Code of Conduct - May 2025.pdf](#)

[Professional Boundaries with Former Students Policy 2023](#)

[HOME VISITS POLICY 2023](#)

[Bilborough College Low-Level Concerns Policy 2023](#)

[BFMAT - Managing Allegations Against Staff.pdf](#)

[College Intimate Care Policy 2022](#)

[Complaint Policy for Students and Parents 2023](#)

[External Speaker Policy 2024](#)

[Positive Mental Health Student Policy 2021](#)

[Young Carer Policy 2022](#)

[Guidance for safer working practice for those working with children and young people in education settings 2022](#)

[BfMAT Whistleblowing Policy.pdf](#)

[SEND code of practice: 0 to 25 years](#)

[Children missing education](#)

[BFMAT - Recruitment & Selection Policy.pdf](#)

[Grievance Procedure 2016](#)

[Disciplinary Procedure Relating to Staff 2020](#)

[Keeping children safe in education 2024 \(publishing.service.gov.uk\)](#)

[Inclusion Policy 2021](#)

[BFMAT Register of Gifts and Hospitality Form](#)

[Medication and Storage Policy 2021](#)

[Work Experience Policy 2022](#)

[ICT Security Policy](#)

[BFMAT General Data Protection Policy](#)

[Nottingham City Knives and Weapons Guidance for Schools and Education Providers](#)



# SAFEGUARDING WORRIED ABOUT SOMETHING?

UNSAFE NEGLECT ABUSE FGM HARASSMENT  
RELATIONSHIPS GENERATIVE AI SEXIST COMMENTS  
HATE SEXUAL IMAGES DEPRESSION  
FORCED MARRIAGE INAPPROPRIATE BEHAVIOUR  
CYBERBULLYING CRIME MICROAGGRESSION



## SAFEGUARDING TEAM



MICHELLE HARVEY  
DSL



MONIQUE NORCLIFFE  
DEPUTY DSL  
STUDENT SUPPORT



HELEN GINNS-FARROW  
DEPUTY DSL  
STUDENT SUPPORT



KATE MOON  
Ø1.07



CHARLOTTE ANDERTON  
STUDENT SUPPORT



HELEN MADDISON  
STUDENT SUPPORT



EMILY MELLORS  
LEARNING SUPPORT



MOLLIE TRAVIS  
LEARNING SUPPORT



HELEN SMITH  
LEARNING SUPPORT



CHARLOTTE DODD  
EXAMS OFFICE

**Use Whisper if:** You're worried about yourself or a friend, Someone's behaviour in the college community concerns you

**How to use Whisper:** Scan the QR code or select the 'Whisper' tile on the Student Portal. To stay anonymous, leave your name blank—though this may limit how we can respond. All submissions alert a safeguarding team member.

## ADDITIONAL SAFEGUARDING OFFICERS



VICTORIA HUNTER  
PERFORMING  
ARTS



WILL PARKIN  
C0.13



NICOLA MORRIS  
T BLOCK



DAN HODGSON  
Ø1.8A



TOM NICHOLAS  
A1.3



DAVID TOMLIN  
C3.3



DAMIEN HULL  
C1.



## External agency contacts

Nottingham Childrens services - 0115 876 4800 /0115 876 5600 (city)

### **LADO - Nottingham and Nottinghamshire**

Managing Allegations and concerns by adults who work or volunteer with children  
Strategic issues Caroline Hose. Email: LADO [LADO@nottinghamcity.gov.uk](mailto:LADO@nottinghamcity.gov.uk)

Make a referral to the LADO online [CLICK HERE](#)

Alternatively, complete the following form and email to the address on the form.  
LADO Referral Form [LADO Referral Form \(009\).doc](#)

Mrs Claire Maclean, Schools and Education Safeguarding Coordinator, Tel: 0115 8764749  
Email: [Claire.Maclean@nottinghamcity.gov.uk](mailto:Claire.Maclean@nottinghamcity.gov.uk)

Nottinghamshire County Council

Child and Family Services Notts County Council:

Tel: 01158041248, Email: [early.help@nottsccl.gov.uk](mailto:early.help@nottsccl.gov.uk)

The Nottinghamshire Multi-Agency Safeguarding Hub (MASH):

Tel: 03005008090 Email: [mash.safeguarding@nottsccl.gov.uk](mailto:mash.safeguarding@nottsccl.gov.uk).

Nottinghamshire Safeguarding Children's Partnership: Email: [info.nscp@nottsccl.gov.uk](mailto:info.nscp@nottsccl.gov.uk)

Address: Nottinghamshire Safeguarding Children Partnership, County Hall, West  
Bridgford Nottingham, NG2 7QP

Hazel McKibbin, Service Manager, Safeguarding Children (Strategic) and LADO:

Tel: 0115 9773921

Eva Callaghan, Schools, FE Colleges and Early Years Referrals (including nurseries  
and childminders): Tel: 0115 8041272

Nottingham City Children and Families Direct

Tel: 0115 876 4800 Email: [candf.direct@nottinghamcity.gov.uk](mailto:candf.direct@nottinghamcity.gov.uk)

LADO (Local Authority Designated officer) Tina Wright:  
[Tel:0115 8765501](tel:01158765501) Email: [Tina.wright@nottinghamcity.gov.uk](mailto:Tina.wright@nottinghamcity.gov.uk)

### **Derbyshire County Council**

Child and Family Services Derbyshire: Tel: 0162953319

Derby Childrens Services - 01332 641172 (professionals consultation line 07812300329)

Derbyshire Childrens services - 01629 533190 (01629 535353 professional consultation line)  
(referrals online starting point) [Referral Form](#)

**Allegations against Staff, Volunteers and Carers:**

Nottinghamshire

[Managing Allegations/Concerns in Relation to Adults who... \(trixonline.co.uk\)](#)

[ladoleafletforemployers.pdf \(nottinghamshire.gov.uk\)](#)

Derbyshire

<http://www.derbyshirescb.org.uk/pro>

Lincolnshire County Council

Lincolnshire Safeguarding Children Partnership (LSCP) – About the LSCP – Lincolnshire  
County Council Lincolnshire Education Safeguarding Officer: Ruth Fox/Miriam  
Shucksmith. Tel: 01522 554695. Email: [safeguardingschools@lincolnshire.gov.uk](mailto:safeguardingschools@lincolnshire.gov.uk)

Lincolnshire Designated Officer (LADO): Rachael Powis, Kim Murray and Ildiko Kiss

Tel: 01522 554674 Email: [LSCP\\_LADO@lincolnshire.gov.uk](mailto:LSCP_LADO@lincolnshire.gov.uk)

CMARS – Children’s resilience and safeguarding board ([northlincscmars.co.uk](http://northlincscmars.co.uk))

North Lincolnshire Education Safeguarding Officer: Helen Parker

Tel: 07717 586534 Email: [Helen.Parker@northlincs.gov.uk](mailto:Helen.Parker@northlincs.gov.uk)

North Lincolnshire Designated Officer (LADO): Stacey Darker

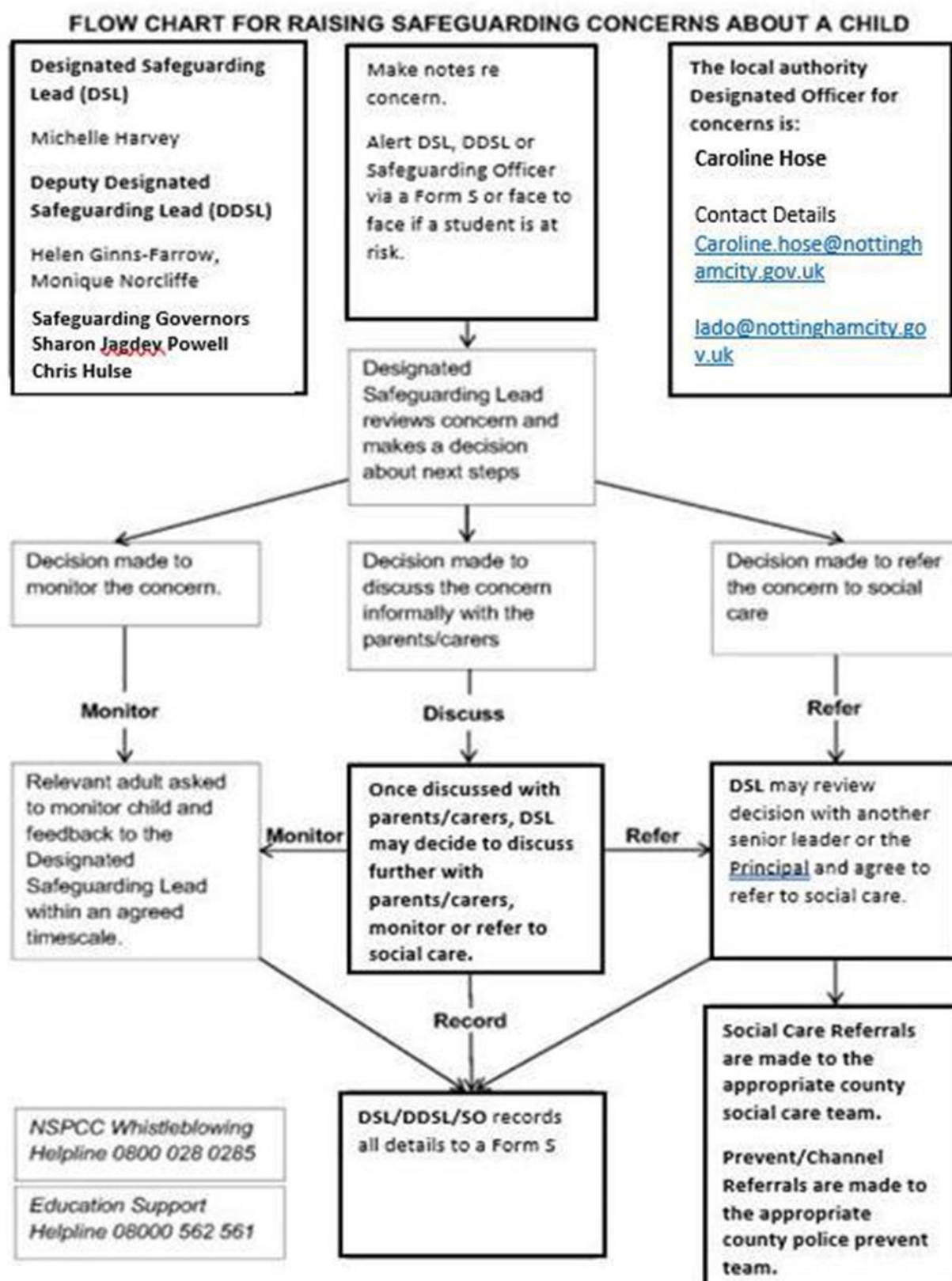
Tel: 01724 298293 Email: [stacey.darker@northlincs.gov.uk](mailto:stacey.darker@northlincs.gov.uk)

NELSCB – SaferNEL – North East Lincolnshire Safeguarding Children Partnership North  
East Lincolnshire Education Safeguarding Officer: Spencer Hunt Tel: 01472 324968

Email: [nelcsp@nelincs.gov.uk](mailto:nelcsp@nelincs.gov.uk)

North East Lincolnshire Designated Officer (LADO): David Palmer

## Appendix four



## Appendix five

### Appropriate adult

- The Designated Safeguarding Lead (and deputy) know that there is a requirement for young people to have an appropriate adult when in contact with Police officers who suspect them of an offence.
- Anyone who appears to be under 18, shall, in the absence of clear evidence that they are older, be treated as a child for the purposes (PACE)
- If an officer has any reason to suspect that a person of any age may be vulnerable, then that person is entitled to be accompanied by an appropriate adult at any point (PACE)
- The Designated Safeguarding (or deputy) will communicate any vulnerabilities known by the college to the police officer who wishes to speak to a student about an offence they may suspect. This communication will be recorded on a S Form.
- If the DSL or deputy does not feel an officer is acting in accordance with PACE when they have been informed of the vulnerabilities, they will ask to speak with a supervisor or contact 101 to escalate their concerns.
- If there are grounds to suspect an offence and a person must be cautioned before questioned about an offence, or asked further questions if the answers they provide the grounds for suspicion, or when put to them the suspect's answers or silence, (i.e. failure or refusal to answer or answer satisfactorily) may be given in evidence to a court in a prosecution.
- A young person or vulnerable person must not be cautioned unless the appropriate adult is present. If a child or a vulnerable person is cautioned in the absence of the appropriate adult, the caution must be repeated in the appropriate adult's presence.

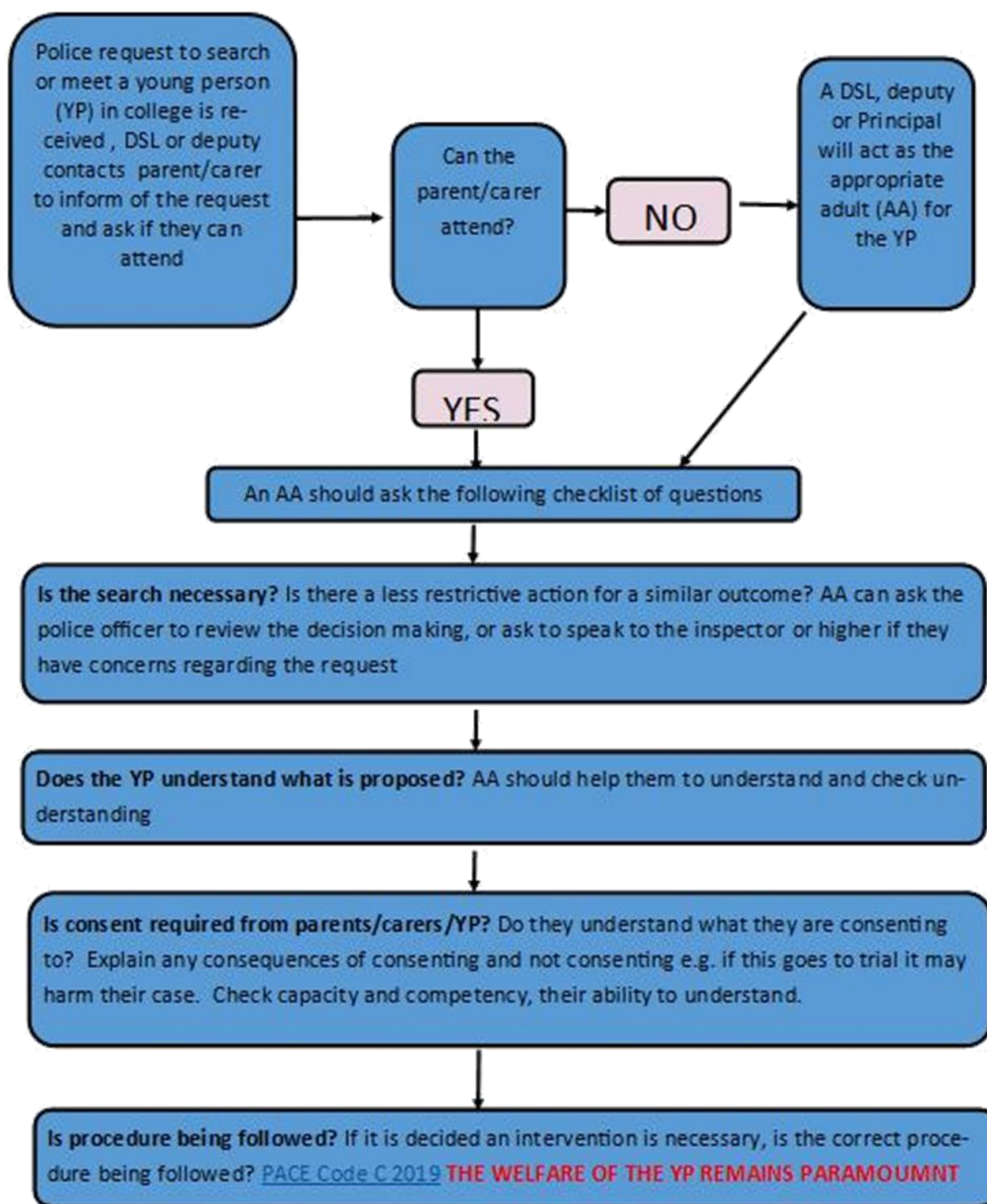
#### **For a child the appropriate adult means:**

The parent, carer or, local authority if in their care or voluntary organisation, a person representing that authority or organisation (DSL, deputy or Principal at Bilborough College). a social worker of a local authority failing these, some other responsible adult aged 18 or over who is not; a police officer; employed by the police; under the direction or control of the chief officer of a police force; or a person who provides services under contractual arrangements (but without being employed by the chief officer of a police force), to assist that force in relation to the discharge of its chief officer's functions,

Further information can be found in the Statutory guidance - [PACE Code C 2019](#).

## Appropriate Adult Police Search/Meeting Request - Procedures Flowchart

**IMPORTANT INFORMATION**—These procedures should be followed alongside the statutory guidance [PACE Code C 2019](#)





## Appendix six

### Staff declaration safeguarding policies

September 2024

As part of our College's Safeguarding Policy we are required to ensure that every member of staff has read and understood all relevant college policies and attended all safeguarding training relevant to their role.

We therefore require all staff to complete the following declaration (*in addition to the declarations signed by new staff on their appointment and the updates to policies which are circulated periodically*). A copy of this declaration will be scanned onto your individual 'People Team' file.

Please sign to confirm the following:

<b>Safeguarding Policy</b>
I understand that safeguarding is everyone's responsibility including my own.
I know who the College's Safeguarding Team are and understand the procedures for reporting safeguarding concerns.
I know how to access a copy of the College's Safeguarding Policy (Staff Portal and College Website) and I understand the requirement to seek advice if any aspect of this policy is not clear.
I have read and understood <a href="#">Part 1 of Keeping Children Safe in Education</a> (effective from Sept 2024 <i>(or Annex A for Staff who do not working directly with children)</i> )
<b>Managing Allegations against Staff Policy</b>
I know how to access a copy of the College's Managing Allegations against Staff <a href="#">Policy</a> available on the staff portal and I understand the requirement to seek advice from the Principal/DSL/Director of HR if any aspect of this policy is not clear.
I understand the requirement to report immediately any allegations or concerns about staff (including volunteers, contractors and those working on the college premises) to the College Principal or DSL if the allegation/concern may meet the 'harm threshold' as set out in this policy.
<b>Staff Code of Conduct</b>
I confirm that I have read and understood the <a href="#">Staff Code of Conduct</a> and understand the requirement to seek advice from my line manager/ the Director of HR/ the Principal or any member of SLT should I require advice/ clarity on any aspect of this policy.
I understand that the college has adopted the Guidance for Safer Working Practice for Young People Working in Education Setting ('GSWP') as part of its Staff Code of Conduct.
<b>Guidance for Safer Working Practice for Young People Working in Education Setting ('GSWP') – February 2022</b>
I confirm that I have read and understand the <a href="#">Guidance for Safer Working Practice for those Working with Children and Young People in Education Settings 'GSWP'</a> dated February 2022.
I understand the requirement to seek further advice from either the DSL/ Principal/ Deputy Principal / Director of HR if I require clarification on any aspect of the 'GSWP.'
I understand the requirement to take advice from either the DSL/ Principal/ Deputy Principal/ Director of HR over any incident relating to the GSWP which may give rise to concern.
I understand the requirement to self-report to the DSL/ Principal/ Deputy Principal/ Director of HR if my practice, conduct or behaviour may have fallen short of the GSWP.
<b>Policy on Reporting Low Level Concerns</b>
I understand what may constitute a low-level concern and I understand my responsibility to report low level concerns regarding any member of staff or individual working in/ on behalf of the College to the DSL/ Director of HR/ Principal
I am aware of how to access: the College's Low Level Concern Policy available on the staff portal the reporting tool which can be used to report 'Low-level Concerns' available on the staff portal.
<b>Prevent</b>

I have read and understood the College's Prevent Strategy.
<b>Policy on Professional Boundaries with Former Students</b>
I understand that it is my responsibility to ensure I am familiar with the above policy and that I should seek advice if any aspect of this policy is not clear.
<b>Whistleblowing Policy</b>
I understand that the College has a Confidential Reporting Procedure 'Whistleblowing' where I can raise any serious concerns I have about the college, confidentially, to the Principal/Director of HR or (where reporting internally to the college would not be appropriate) to the CEO of BF MAT/ The Chair of Trustees.
<b>Online Safety Policy</b>
I have read and understand the College's Online safety <a href="#">Policy</a>
<b>Safeguarding Training 2024/25</b>
<p><b>Annual Statutory Safeguarding Training</b> – I have attended the annual start of year safeguarding session in September 2024 which all staff are required to attend.</p> <p>Or, I have completed the online annual safeguarding update training</p> <p>I have completed the on-line quiz following the above training.</p> <p><a href="https://forms.office.com/e/a2jN5v5F3G">https://forms.office.com/e/a2jN5v5F3G</a></p> <p><b>GSWP Training</b> – I have attended the training session on 'GSWP' in July 2023/September 2023 or fully read the GSWP document and completed the quiz to demonstrate my understanding:</p> <p><a href="https://forms.office.com/e/sDvM7JOWSy">https://forms.office.com/e/sDvM7JOWSy</a></p> <p><b>Prevent Training</b> – I have attended the Prevent training session in November 2022 or I have completed online Prevent Training in the last two years</p>
<b>NAME:</b>
<b>SIGNED:</b>
<b>Date of Signature:</b>

## Appendix seven

### Further reading, safeguarding information

**This safeguarding policy** contains important additional information about specific forms of abuse and safeguarding issues. All college staff including college leaders and those staff who work directly with young people should read this.

**Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)** Both CSE and CCE are forms of abuse and both occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a young person into sexual or criminal activity. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources. In some cases, the abuse will be in exchange for something the victim needs or wants and/or will be to the financial benefit or other advantage (such as increased status) of the perpetrator or facilitator. The abuse can be perpetrated by individuals or groups, males or females, and children or adults. The abuse can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence. Victims can be exploited even when activity appears consensual, and it should be noted exploitation as well as being physical can be facilitated and/or take place online.

Indicators of child sexual exploitation may include:

- Acquisition of money, clothes, mobile phones, etc. without plausible explanation.
- Gang-association and/or isolation from peers/social networks.
- Exclusion or unexplained absences from school, college, or work.
- Leaving home/care without explanation and persistently going missing or returning late.
- Excessive receipt of texts/phone calls.
- Returning home under the influence of drugs/alcohol.
- Inappropriate sexualised behaviour for age/sexually transmitted infections.
- Evidence of/suspicions of physical or sexual assault.
- Relationships with controlling or significantly older individuals or groups.
- Multiple callers (unknown adults or peers).
- Frequenting areas known for sex work.
- Concerning use of internet or other social media.
- Increasing secretiveness around behaviours; and
- Self-harm or significant changes in emotional well-being.
- Young people who have older boyfriends or girlfriends.

Potential vulnerabilities include:

Although the following vulnerabilities increase the risk of child sexual exploitation, it must be remembered that not all young people with these indicators will be exploited. Child sexual exploitation can occur without any of these issues.

- Having a prior experience of neglect, physical and/or sexual abuse.
- Lack of a safe/stable home environment, now or in the past (domestic abuse or parental substance misuse, mental health issues or criminality, for example). Recent bereavement or loss.
- Social isolation or social difficulties.
  - Absence of a safe environment to explore sexuality.
  - Economic vulnerability.
  - Homelessness or insecure accommodation status.
  - Connections with other children and young people who are being sexually exploited.
  - Family members or other connections involved in adult sex work.
  - Having a physical or learning disability.
  - Being in care (particularly those in residential care and those with interrupted care histories); and
  - Sexual identity.
  - Young people who suffer from sexually transmitted infections or become pregnant.

More information can be found in: Child sexual exploitation: Definition and a guide for practitioners (DfE 2017)

**Child Criminal Exploitation (CCE)** CCE is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a young person into any criminal activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial or other advantage of the perpetrator or facilitator and/or through violence or the threat of violence. The victim may have



been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact; it can also occur through the use of technology.

CCE can include young people being forced to work in cannabis factories, being coerced into moving drugs or money across the country forced to shoplift or pickpocket, or to threaten other young people.

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; and
- young people who regularly miss college or education or do not take part in education.

**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) and weapons to ensure compliance of victims.

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.

Further information on the signs of a young person's involvement in county lines is available in guidance published by the [Home Office](#).

**Domestic Abuse** in April 2021, the Domestic Abuse Act 2021 received Royal Assent and introduced a statutory definition for the first time. The Domestic Abuse Act 2021 (Part 1) defines domestic abuse as any of the following behaviours, either as a pattern of behaviour, or as a single incident, between two people over the age of 16, who are 'personally connected' to each other:

- a) physical or sexual abuse.
- b) violent or threatening behaviour.
- c) controlling or coercive behaviour.
- d) economic abuse (adverse effect of the victim to acquire, use or maintain money or other property; or obtain goods or services); and
- e) psychological, emotional, or other abuse.

People are 'personally connected' when they are or have been married to each other or civil partners; or have agreed to marry or become civil partners. If the two people have been in an intimate relationship with each other, have shared parental responsibility for the same child, or they are relatives.

The definition of Domestic Abuse applies to children if they see or hear, or experience the effects of, the abuse; and they are related to the abusive person. (The definition can be found here: [Domestic Abuse Act 2021 \(legislation.gov.uk\)](#))

Anyone can be a victim of domestic abuse, regardless of sexual identity, age, ethnicity, socio-economic status, sexuality or background and domestic abuse can take place inside or outside of the home. Often leaving them with a 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.

**Female genital mutilation (FGM)** refers to procedures that intentionally alter or cause injury to the female genital organs for non-medical reasons. The practice is illegal in the UK. FGM typically takes place between birth and around 15 years old; however, it is believed that most cases happen between the ages of 5 and 8.

Risk factors for FGM include:

- low level of integration into UK society
- mother or a sister who has undergone FGM.
- girls who are withdrawn from PSHE
- visiting female elder from the country of origin
- being taken on a long holiday to the country of origin
- talk about a 'special' procedure to become a woman.

Symptoms of FGM

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

Indications that FGM may have already taken place may include:

- difficulty walking, sitting, or standing and may even look uncomfortable.
- spending longer than normal in the bathroom or toilet due to difficulties urinating.
- spending long periods of time away from a classroom during the day with bladder or menstrual problems.
- frequent urinary, menstrual or stomach problems.
- prolonged or repeated absences from school or college, especially with noticeable behaviour changes (e.g. withdrawal or depression) on the girl's return
- reluctance to undergo normal medical examinations.
- confiding in a professional without being explicit about the problem due to embarrassment or fear.
- talking about pain or discomfort between her legs

### **Female Genital Mutilation reporting procedures.**

Where there is a disclosure of FGM it is important that staff know what their statutory response should be. Keeping Children Safe in Education (2023), paragraph 44 says 'whilst **all** staff should speak to the designated safeguarding lead (or deputy) with regard to any concerns about female genital mutilation (FGM), there is a specific **legal duty on teachers**. If a teacher, in the course of their work in the profession, discovers that an act of FGM appears to have been carried out on a girl under the age of 18, the teacher must report this to the police'.

What is often less well-known is what a teacher should do next to make a report.

Below is a very short summary and must be read in conjunction with the mandatory reporting guidance.

The mandatory reporting procedures say:

'It is recommended that you make a report orally by calling 101, the single non-emergency number.'

'Where there is a risk to life or likelihood of serious immediate harm, professionals should report the case immediately to police, including dialling 999 if appropriate'.

In most cases 'reports under the duty should be made as soon as possible after a case is discovered, and best practice is for reports to be made by the close of the next working day'.

The procedures also set out what information is needed, in order to make a report.

See here: [Mandatory Reporting of Female Genital Mutilation: Procedural Information \(2022\)](#)

**Child on child abuse** All staff should be aware that young people can abuse other young people (often referred to as child-on-child abuse). This is most likely to include, but may not be limited to:

- bullying (including cyberbullying).
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm.
- sexual violence, such as rape, assault by penetration and sexual assault. A sexual assault offence can include intentionally touching another person and the touching is sexual, no consent given, or does not reasonably believe that consent is given. Kissing someone without consent or touching someone's bottom/breasts/genitalia without consent can constitute 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.
- upskirting, which typically involves taking a picture under a person's clothing without them.
- knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or alarm.
- Nudes and semi-nudes (also known as youth produced sexual imagery); and
- initiation/hazing type violence and rituals.

All staff should be clear as to the college's policy and procedures with regards to child-on-child abuse.

**Serious violence** All staff should be aware of indicators, which may signal that young people are at risk from or are involved with serious violent crime. These may include increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in well-being, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that young people have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation.

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

**Female Genital Mutilation** Whilst all staff should speak to the designated safeguarding lead (or deputy) with regard to any concerns about female genital mutilation (FGM), there is a specific legal duty on teachers. If a teacher, in the course of their work in the profession,

discovers that an act of FGM appears to have been carried out on a girl under the age of 18, the teacher must report this to the police.

**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 childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how young people's experiences, can impact on their mental health, behaviour, and education. If staff have a mental health concern about a young person that is also a safeguarding concern, immediate action should be taken, to speak to the designated safeguarding lead or a deputy. The department has published advice and guidance on [Preventing and Tackling Bullying, and Mental Health and Behaviour in Schools](#) (which may also be useful for colleges). In addition, Public Health England has produced a range of resources to support secondary school teachers to promote positive health, well-being and resilience among young people including its guidance [Promoting children and young people's emotional health and well-being \(2021\)](#). Its resources include social media, forming positive relationships, smoking and alcohol. See Rise Above for links to all materials and lesson plans.

**Young people and the court system** young people are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. Appropriate age-related information can be found here [Youth crime | The Crown Prosecution Service \(cps.gov.uk\)](#)

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

**Children and young people missing, repeated or prolonged absence from education** All staff should be aware that young people going missing, particularly repeated, and prolonged absences, can act as a vital warning sign of a range of safeguarding possibilities. This may include abuse and neglect, which may include sexual abuse or exploitation and can also be a sign of child criminal exploitation including involvement in county lines. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation or risk of forced marriage. Early intervention is necessary to identify the existence of any underlying safeguarding risk and to help prevent the risks of a young person going missing in future. Staff should be aware of their school's or college's unauthorised absence and young people missing from education procedures. As a college, we monitor attendance carefully and address poor attendance without delay.

**Young people with family members in prison** Approximately 200,000 young people in England and Wales 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. [NICCO](#) provides information designed to support professionals working with offenders and their young people, to help mitigate negative consequences for those young people.

**Domestic abuse** the cross-government definition of domestic violence and abuse is 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; and emotional.

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 103 National Crime Agency - Modern slavery and human-trafficking 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. [Operation Encompass](#) In May 2024, the Victims and Prisoner's Act received Royal Assent. This places a statutory duty on all police forces in England and Wales to participate in Operation Encompass. It helps police and schools/colleges work together to provide emotional and practical help to young people. The system ensures that when police are called to an incident of domestic abuse, where there are young people in the household who have experienced the domestic incident, the police will inform the key adult (usually the designated safeguarding lead) in college. This ensures that the school has up to date relevant information about the young person's circumstances and can enable support to be given to the young person according to their needs. Operation Encompass provides an advice and helpline service for all staff members from educational settings who may be concerned about children who have experienced domestic abuse. The helpline is available 8AM to 1PM, Monday to Friday on 0204 513 9990 (charged at local rate).]

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

Additional advice on identifying 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 on children](#)
- [SafeLives: young people and domestic abuse.](#)

**Homelessness** Being homeless or being at risk of becoming homeless presents a real risk to a young person's welfare. The designated safeguarding lead (and any deputies) should be aware of contact details and referral routes into the Local Housing Authority so they can raise/progress concerns at the earliest opportunity.

Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse, and anti-social behaviour, as well as the family being asked to leave a property. Whilst referrals and/or discussion with the Local Housing Authority should be progressed as appropriate, and in accordance with local procedures, this does not, and should not, replace a referral into children's social care where a young person has been harmed or is at risk of harm.

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

In most cases school and college staff will be considering homelessness in the context of young people who live with their families, and intervention will be on that basis. However, it should also be recognised in some cases 16- and 17-year-olds could be living independently from their parents or guardians, for example through their exclusion from the family home, and will require a different

level of intervention and support. Children's services will be the lead agency for these young people and the designated safeguarding lead (or a deputy) should ensure appropriate referrals are made based on the young person's circumstances. The department and the Ministry of Housing, Communities and Local Government have published joint statutory guidance on the provision of accommodation.

for 16 and 17 year olds who may be homeless and/or require accommodation: [here](#).

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

**Actions** If staff have a concern regarding a young person that might be at risk of HBA or who has suffered from HBA, they should speak to the designated safeguarding lead (or deputy). As appropriate, they will activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and children's social care. Where FGM has taken place, since 31 October 2015 there has been a mandatory reporting duty placed on teachers<sup>104</sup> that requires a different approach (see following section).

**FGM** comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences.

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

Teachers must personally report to the police cases where they discover that an act of FGM appears to have been carried out. Unless the teacher has good reason not to, they should still consider and discuss any such case with the school's or college's designated safeguarding lead (or deputy) and involve children's social care as appropriate. The duty does not apply in relation to at risk or suspected cases (i.e. where the teacher does not discover that an act of FGM appears to have been carried out, either through disclosure by the victim or visual evidence) or in cases where the woman is 18 or over. In these cases, teachers should follow local safeguarding procedures. The following is a useful summary of the FGM mandatory reporting duty: [FGM Fact Sheet](#).

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

for example). Nevertheless, some perpetrators use perceived cultural practices as a way to coerce a person into marriage. Schools and colleges can play an important role in safeguarding young people from forced marriage.

The Forced Marriage Unit has published [statutory guidance](#) and [Multi-agency](#) guidelines pages 35-36 of which focus on the role of schools and colleges. School and college staff can contact the Forced Marriage Unit if they need advice or information: Contact: 020 7008 0151 or email [fmu@fco.gov.uk](mailto:fmu@fco.gov.uk).

**Marriage** Since February 2023 it has also been a crime to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday, even if violence, threats.

or another form of coercion are not used. As with the existing forced marriage law, this applies to non-binding, unofficial 'marriages' as well as legal marriages. (see KCSIE page 155) (Legal age increases to 18)

**Preventing radicalisation** young people are susceptible to extremist ideology and radicalisation. Similar to protecting young people from other forms of harms and abuse, protecting young people from this risk should be a part of a schools' or colleges' safeguarding approach.

- **Extremism** is the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces.
- **Radicalisation** refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.
- **Terrorism** is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious, or ideological cause.
- **Recognising Extremism**

Early indicators and signs of radicalisation or extremism may include:

- showing sympathy for extremist causes
- glorifying violence, especially to other faiths or cultures
- making remarks or comments about being at extremist events or rallies outside school
- evidence of possessing illegal or extremist literature
- advocating messages similar to illegal organisations or other extremist groups
- out of character changes in dress, behaviour, and peer relationships (but there are also very powerful narratives, programmes, and networks that young people can come across online so involvement with particular groups may not be apparent.)
- secretive behaviour
- online searches or sharing extremist messages or social profiles.
- intolerance of difference, including faith, culture, gender, race, or sexuality
- graffiti, artwork or writing that displays extremist themes.
- attempts to impose extremist views or practices on others.
- verbalising anti-Western or anti-British views
- advocating violence towards others
- They become withdrawn and focused on one ideology.
- The individual becomes increasingly intolerant of more moderate views.
- They may become isolated from family, friends, peers, or social groups.
- Decline in the standard of work, Missing lessons.



There is no single way of identifying whether a young person is likely to be susceptible to an extremist ideology. Background factors combined with specific influences such as family and friends may contribute to a young person's vulnerability. Similarly, radicalisation can occur through many different methods (such as social media or the internet) and settings (such as within the home). However, it is possible to protect vulnerable people from extremist ideology and intervene to prevent those at risk of radicalisation being radicalised. As with other safeguarding risks, staff should be alert to changes in young people's behaviour, which could indicate that they may be in need of help or protection. Staff should use their judgement in identifying young people who might be at risk of radicalisation and act proportionately which may include the designated safeguarding lead (or deputy) making a Prevent referral. The school's or college's designated safeguarding lead (and any deputies) should be aware of local procedures for making a Prevent referral.

**The Prevent duty** All schools and colleges are subject to a duty under section 26 of the Counter Terrorism and Security Act 2015 (the CTSA 2015), in the exercise of their functions, to have "due regard to the need to prevent people from being drawn into terrorism". This duty is known as the Prevent duty. The Prevent duty should be seen as part of schools' and colleges' wider safeguarding obligations. Designated safeguarding leads and other senior leaders should familiarise themselves with the revised Prevent duty guidance: for England and Wales, especially paragraphs 57-76. The guidance is set out in terms of four general themes: risk assessment, working in partnership, staff training, and IT policies. There is additional guidance: Prevent duty guidance: for further education institutions in England and Wales that applies to colleges.

**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. According to the Prevent duty guidance 'having due regard' means that the authorities should place an appropriate amount of weight on the need to prevent people being drawn into terrorism when they consider all the other factors relevant to how they carry out their usual functions. "Terrorism" for these purposes has the same meaning as for the Terrorism Act 2000 (section 1(1) to (4) of that Act). Prevent referrals may be passed to a multi-agency Channel panel, which will discuss the individual referred to determine whether they are vulnerable to being drawn into terrorism and consider the appropriate support required. A representative from the school or college may be asked to attend the Channel panel to help with this assessment. An individual's engagement with the programme is entirely voluntary at all stages.

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

**Additional support** The department has published further advice for schools on the [Prevent duty](#).

The advice is intended to complement the Prevent guidance and signposts to other sources of advice and support.

**Child on child abuse** young people can abuse other young people. This is generally referred to as child-on-child abuse and can take many forms. This can include (but is not limited to): abuse within intimate partner relationships; bullying (including cyberbullying); sexual violence and sexual harassment; physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm; sharing nudes and semi-nudes and initiation/hazing type violence and rituals.

**Sexual violence and sexual harassment between young people in colleges.** Sexual violence and sexual harassment can occur between two young people of any age and sex. It can also occur through a group of young people sexually assaulting or sexually harassing a single young person or group of young people.



Young people who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and offline (both physical and verbal) and are never acceptable. It is important that all victims are taken seriously and offered appropriate support. Staff should be aware that some groups are potentially more at risk.

Staff should be aware of the importance of:

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

**Sexual violence** It is important that school and college staff are aware of sexual violence and the fact young people can, and sometimes do, abuse their peers in this way. When referring to sexual violence we are referring to sexual violence offences under the Sexual Offences Act 2003 as described below:

**Rape:** A person (A) commits an offence of rape if: he intentionally penetrates the vagina, anus, or mouth of another person (B) with his penis, B does not consent to the penetration and A does not reasonably believe that B consents.

**Assault by Penetration:** A person (A) commits an offence if: they intentionally penetrate the vagina or anus of another person (B) with a part of their 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: they intentionally touch 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 they agree by choice to that penetration and has the freedom and capacity to make that choice.

**Sexual harassment.** When referring to sexual harassment we mean ‘unwanted conduct of a sexual nature’

that can occur online and offline. When we reference sexual harassment, we do so in the context of child-on-child sexual harassment. 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.

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

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

- sexual “jokes” or taunting.
- physical behaviour, such as: deliberately brushing against someone, interfering with someone’s clothes.
- (schools and colleges should be considering when any of this crosses a line into sexual violence - it is important to talk to and consider the experience of the victim) and displaying pictures, photos, or drawings of a sexual nature; and
- online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment.

and/or sexual violence. It may include:

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

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

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

If staff have a concern about a young person or a young person makes a report to them, they should speak to the designated safeguarding lead (or a deputy).

**“Hidden men” and “invisible fathers”** are terms often used in response to the idea that male caregivers in a child’s life can sometimes be excluded from services or overlooked by professionals working with children and their families. With words like “hidden” and “invisible”, you might imagine that these men hide behind the sofa when the health visitor calls round or camouflage themselves into the wall during a GP appointment. In reality, literature tells us that these men are often not “hidden” at all, but rather “unseen”.

### **Why do male caregivers need to be “seen”?**

At every stage in a child’s life, male caregivers such as fathers, stepfathers, or mother’s partners, play an important role in a child’s cognitive, emotional, and physical development<sup>1</sup>. They may be primary caregivers or provide support by sharing caring responsibilities. Yet in some cases, fathers and male carers are not able to access service or appropriate parenting support and education to allow them to be the best parent they can be<sup>2</sup>. Without including men, professionals may also fail to identify positive caring factors or detect potential safeguarding concerns in a child’s life.

Thinking about who is “unseen” or “unknown” can help professionals to focus on how to identify and engage with the men in a child’s life and consider any support or protection needs.

## **Why do male caregivers go “unseen”?**

### **Over-focus on maternal care giving.**

Male caregivers may be overlooked for inclusion in wrongly assume that women are the sole or main participants.

Working hours, lack of outreach from universal services involved in parenting, and an absence of tailored support reduces opportunities for fathers and male caregivers to learn how to care for their child or get support for any problems that they are facing.

Analysis of case reviews found that services relied on the mother to provide information on their child’s life, when there were male caregivers with knowledge or concerns to share.

### **Lack of information sharing**

Some case reviews highlight how a lack of information sharing between agencies caused men to go “unseen”. For example, practitioners in adult services (such as substance misuse or mental health) may be unaware that a man they are supporting is in contact with children, and therefore don’t share potential safeguarding concerns with professionals working directly with children and families.

Fathers and male caregivers may also not be kept up to date with health or safeguarding concerns involving their child, due to services communicating solely with mothers, and so are not able to participate fully in caring for and protecting them.

### **Professional anxiety or sensitivity**

Some case reviews found that in instances where a child’s male caregiver was abusive or intimidating, practitioners avoided engaging with them due to fear or anxiety.

Practitioners also sometimes failed to spot an unsafe man in a child’s life because they felt uncomfortable assessing the mother’s personal or sexual relationships.

(Child Safeguarding Practice Review Panel, 20213; Vincent, Su, Dudley Safeguarding People Partnership, 20214).

## **How can we ensure that male caregivers are “seen”?**

Learning from case reviews has shown how agencies can identify and involve men in a child’s life.

### **Identify**

Ask questions and work with a child’s primary caregivers to identify any men in the child’s life. ‘See the adult behind the child’ and work with other agencies to find out the members of a child’s household and any new adults the child has significant contact with. Record the different names or aliases fathers and male carers go by, (such as nicknames), which could reduce the risk of them being missed out or mislabelled.

### **Involve**

Expand universal service appointment times to allow fathers and male caregivers to accompany their child to services.

Teach parents about the important role that fathers and male caregivers play in child wellbeing.

Start a dialogue with fathers and male carers about any concerns or harmful behaviours in their own lives. This may reduce the stigma around asking for help and allow them to access appropriate services.

### **Key points to take away...**

Shifting to using “unseen” instead of “hidden” may:

- build a fuller picture of the network of relationships around a child.
- identify potential child protection concerns or protective factors in a child’s life.

- recognise men in need of support for themselves or help with parenting.
- help fathers and male carers access support and education to best care for their child.