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This policy applies to all College activity including ESF contracts.

SAFEGUARDING AND PREVENT POLICY 2022/23

1. INTRODUCTION

1.1 Leicester College places the highest importance on safeguarding and the safety and wellbeing of students is paramount in all College activities. Our commitment to safeguarding applies to all staff, students and other College users; including volunteers, external contractors, remote students, apprentices, students studying higher education and employers where students have work placements.

1.2 This policy sets out Leicester College's commitment in relation to its duty to safeguard and promote the wellbeing of children, young people and vulnerable adults across all the provision.

1.3 There are three main elements to our Safeguarding and Prevent Policy:

Prevention: creating a positive environment, raising awareness of safeguarding priorities within teaching activities and pastoral support to children, young people and vulnerable adults and maintaining an attitude of 'it could happen here'.

Protection: ensuring policies and procedures are in place to minimise the risks to children, young people and vulnerable adults, including well-trained staff who are supported to respond appropriately and sensitively to safeguarding concerns.

Support: to children and vulnerable adults and staff who may have been abused or radicalised.

2. OBJECTIVE

2.1 At Leicester College, safeguarding and promoting the welfare of our students is everyone's responsibility. **Everyone** who comes into contact with students and their families has a role to play. To fulfil this responsibility effectively all practitioners should

make sure their approach is student centred. This means they should consider at all times what is in the best interests of the students.

- 2.2 No single practitioner can have a full picture of a student's needs and circumstances. If students and families are to receive the right help at the right time, everyone who comes into contact with them has a role to play in identifying concerns, sharing information and taking prompt action.
- 2.3 The objective of this policy is to ensure there is a clear, transparent and robust approach to Leicester College's statutory and moral duty in relation to all of its students.
- 2.4 It is intended to:
- Ensure appropriate action is taken that will contribute to the safeguarding of all students;
 - Raise awareness of the importance of safeguarding students;
 - Raise awareness regarding issues vulnerable adults may be faced with; and,
 - Indicate action to be taken in certain circumstances.
- 2.5 This policy covers all children and young people under the age of 18 and vulnerable adults including:
- Students and prospective students under 18 enrolled on full and part-time courses;
 - Apprentices (under 18);
 - Elected home educated (under 18);
 - Higher education students;
 - Students studying with sub-contractors;
 - Visitors to the College (under 18);
 - Children attending the Leicester College nurseries;
 - Employees, work experience students or volunteers who are under 18 years of age;
 - All students classed as vulnerable over the age of 18 years; and,
 - Vulnerable adults.

3. POLICY STATEMENT

3.1 The College will:

- Comply with all legal and statutory duties in relation to safeguarding and wellbeing of children, young people and vulnerable adults.
- Take a preventative approach to protecting children, young people and vulnerable adults from potential harm, damage, radicalisation or being drawn into terrorism (violent and non-violent extremism).
- Take all appropriate actions to address concerns about the welfare of children, young people and vulnerable adults.
- Have particular regard to children, young people and vulnerable adults who:
 - Are disabled and have specific additional needs.
 - Have special education needs (whether or not they have an Education, Health and Care Plan).
 - Are young carers.
 - Are showing signs of being drawn into anti-social or criminal behaviour;

- including gang involvement and associated organised crime groups.
- Are frequently missing from care or from home.
- Are misusing drugs and alcohol.
- Are at risk of modern slavery, trafficking or exploitation.
- Have family circumstances presenting challenges for them, such as substance misuse, adult mental health problems, or domestic abuse.
- Are looked after or have previously been looked after (care leavers).
- Have returned to their family home from care.
- Are showing early signs of neglect or abuse.
- Are at risk of radicalisation or exploitation.
- Are at risk of FGM.
- Are privately fostered.
- Have a social worker.
- Work to agreed local policies and procedures in full partnership with other local agencies.
- Plan, implement, monitor and review policies and procedures to ensure the maximum is done to provide a safe environment for children, young people and vulnerable adults in the College.
- Take all reasonable measures to ensure that risks of harm to children, young people and vulnerable adults' welfare is minimised by the appropriate:
 - Risk assessment and management.
 - Health and safety procedures.
 - Staff selection, recruitment, induction, supervision and training.
 - Selection of partners delivering services to the College.
 - Creation and promotion of an open work culture.
 - Reacting to and reporting abuse.
- Ensure that concerns that a child, young person or vulnerable adult is at risk of significant harm are referred in a timely manner to the person's local Social Care Services.
- Ensure that all staff receive adequate training and updates to familiarise themselves with safeguarding, Prevent, child protection issues and responsibilities and the College's policies and procedures, with refresher training at least every two years.
- Have specific and robust processes in place to respond to allegations against a member of staff.
- Ensure that best practice and learning is shared across the College through a safeguarding network.
- Empower children, young people and vulnerable adults to develop a healthy and safe lifestyle to help them manage risks, develop judgement on acceptable behaviour, resist unhelpful pressure and challenge extremist narratives. This will be done through an effective personal development and enrichment framework and pastoral and targeted support for students.

4. RESPONSIBILITIES

4.1 Governing Body

4.1.1 The Governing Body has strategic leadership responsibility for the College's

safeguarding arrangements, and ensuring they comply with the College's duties under legislation.

4.1.2 The Governing Body will appoint a designated Governor with responsibility for liaising with the Principal and Designated Safeguarding Lead over matters regarding safeguarding and child protection, including:

- Ensuring the College has adopted the interagency procedures produced by Leicester City, Leicestershire and Rutland Safeguarding Children Partnership (LSCP);
- Ensuring the Governing Body considers the College's policy on safeguarding each year;
- Ensuring that each year the Governing Body is informed on how the College and its staff have complied with the policy. This includes receiving a report on training that staff have undertaken; and,
- Overseeing the liaison between social care in connection with allegations against the Principal or the Designated Safeguarding Lead. This will not involve undertaking any investigation, but will ensure good communication between the parties and provide information to assist enquiries.
- To assist in these duties, the Governing Body will receive appropriate training as directed by the LSCP.

4.2 Designated Safeguarding Lead

4.2.1 The College's Designated Safeguarding Lead is the Deputy Principal, Finance and Resources. They have a key duty to take the lead responsibility for raising awareness within the College of issues relating to the welfare of children, young people and vulnerable adults, and the promotion of a safe environment for those individuals who are learning within the College. They will receive training in safeguarding and child protection issues and inter-agency working, as required by the Local Safeguarding Children's Partnership, and will receive refresher training in accordance with their recommendations.

4.2.2 The Designated Safeguarding Lead will be expected to:

- Oversee the referral of cases of suspected abuse or allegations to Social Care Services.
- Oversee the referral of cases to the Channel programme where there is a radicalisation concern.
- Provide advice and support to other staff in relation to safeguarding and child protection issues.
- Maintain a record of any child protection referral, complaint or concern (even where the concern does not lead to a referral).
- Ensure that parents / carers of children, young people and vulnerable adults within the College are aware of the Safeguarding Policy.
- Liaise with the Local Authority and LSCP and other appropriate agencies.
- Ensure that staff receive appropriate training in safeguarding and child protection issues and are aware of this Policy.
- Provide an annual report to the Governing Body of the College, setting out

how the College has discharged its duties.

- Report deficiencies in procedure or policy identified by the LSCP (or others) to the Governing Body at the earliest opportunity.

4.3 Deputy Designated Safeguarding Lead

4.3.1 The College's Deputy Designated Safeguarding Lead is the Director of Student Services and Marketing, and shall support the Deputy Principal in carrying out their role. Some activities relating to the Designated Safeguarding Lead will be delegated to the Deputy Lead and Designated Safeguarding Officers, though the Designated Safeguarding Lead will retain ultimate responsibility for all safeguarding and child protection matters.

4.3.2 In addition to the responsibilities outlined in section 3.2 above, the Deputy Designated Safeguarding Lead will be expected to:

- Refer cases of suspected abuse to the local authority children's social care as required.
- Refer cases of suspected radicalisation to the Channel programme.
- Decide whether it is necessary to initiate a Multi-Agency Request for Services (MARF) or Multi-Agency Safeguarding Hub (MASH) referral and who will take the lead.
- Act as contact for young people who are looked after or leaving care.
- Liaise with secondary schools which send pupils to the College to ensure that appropriate arrangements are put in place.
- Liaise with the manager responsible for employers and training organisations that receive children or young people from the College on long term placements, to ensure the appropriate safeguards are put in place.

4.4 Designated Safeguarding Officer

4.4.1 To ensure that there is sufficient support for safeguarding issues throughout the College, Designated Safeguarding Officers who have received Designated Safeguarding Lead training will be available to support the DSL and their deputy and any member of staff on safeguarding and child protection issues.

4.4.2 These DSOs will be expected to:

- Refer cases of suspected abuse to the local authority children's social care as required.
- Refer cases of suspected radicalisation to the Channel programme.
- Act as contact for young people who are looked after or leaving care.
- Liaise with secondary schools which send pupils to the College to ensure that appropriate arrangements are put in place.
- Liaise with the manager responsible for employers and training organisations that receive children or young people from the College on long term placements, to ensure the appropriate safeguards are put in place.
- Provide advice and support to other staff in relation to safeguarding and child protection issues.
- Maintain a record of any child protection referral, complaint or concern (even

where the concern does not lead to a referral).

- Regularly update the Lead Safeguarding Officer on any safeguarding concerns in both their caseload and across the College.
- Record and maintain concise and accurate records which may be used as a source of evidence.

4.5 Director of HR

4.5.1 The Director of HR will be expected to:

- Carry out appropriate checks on applicants to the College, including CRB / DBS checks at the correct level.
- Work with the HR Team to ensure that all staff are trained to an acceptable standard, by establishing and maintaining a training plan / schedule and monitoring compliance with this, ensuring action is taken for non-compliance.
- Ensure that safeguarding policies and practices are a core part of the staff induction, which should include the Safeguarding Policy, Behaviour Policy and the role of the Designated Safeguarding Lead, Deputy Designated Safeguarding Lead, and Designated Safeguarding Officers.
- Develop, monitor and advise on the implementation of procedures for dealing with allegations against staff which are consistent with Children's Safeguarding Partnership / Social Care procedures and national guidance.
- Manage the progress of allegations against staff, liaising with the Designated Safeguarding Lead, and other agencies as required.
- Manage the progress of allegations made against supply / temporary members of staff with the Designated Safeguarding Lead, and other agencies as required.
- Maintain records of staff compliance in understanding the key updates within the Keeping Children Safe in Education report.

4.6 College Staff

4.6.1 All College staff are expected to:

- Establish and maintain an ethos where students and those who are vulnerable feel secure are encouraged to talk and are listened to.
- Be able to reassure students that they are being taken seriously and that they will be supported and kept safe. A student should never be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment. Nor should a student ever be made to feel ashamed for making a report.
- Include in the curriculum and 'core' activities, opportunities for students and vulnerable adults to acquire skills and attitudes to both resist abuse in their own home and to prepare themselves for responsibilities including parenthood in their adult lives. To encourage a belief in equality of opportunity, celebrate diversity and challenge extreme views.
- Ensure all staff, whether permanent, temporary or volunteers, are made aware of the College's Safeguarding Policy, update themselves yearly with the KCSIE report and share our commitment to safeguarding and promoting

the welfare of students and vulnerable adults.

- Ensure mandatory training is completed, where directed, and they keep themselves updated through attendance at Safeguarding Networks, Staff Development sessions and through accessing information on the Safeguarding pages of IntranetPlus.
- Understand and adhere to the reporting procedure for a safeguarding concern, seeking support from the FRO, DSO or LSO where necessary.
- Be aware that technology is a significant component in many safeguarding and wellbeing issues. Students are at risk of abuse online as well as face to face. Students can also abuse their peers online, this can take the form of abusive, harassing and misogynistic messaging, non-consensual sharing of indecent images and sharing of abusive images and pornography to those who do not want to receive it.

4.7 Teaching Staff

4.7.1 In addition to 3.7 above, teaching staff are expected to maintain public trust in the teaching profession as part of their professional duties, as laid out in Teaching Standards 2012.

4.7.2 There is a specific legal duty on teaching staff to report concerns of Female Genital Mutilation (FGM) immediately to the police, in addition to reporting through the normal safeguarding procedure.

4.7.3 Teaching staff should be aware of any welfare, safeguarding or child protection concerns that may affect their students in order to promote educational outcomes. It is the responsibility of the DSL to ensure that this information is disseminated accordingly.

5. DEFINITIONS

5.1 For the purposes of this Policy, the following words and phrases have the meanings as indicated:

- **Abuse:** a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children.
- **“Child” or “Children”** means a person(s) under the age of 18.
- **“Channel”** forms a key part of the Government Prevent Strategy (see below for Prevent definition). The process is a multi-agency approach to identify and provide support to individuals who are at risk of being drawn into terrorism and extremism.
- **“College premises”** means all buildings and land owned or operated by the College.
- **“College staff”** means all College employees, authorised agency staff and

volunteers working on behalf of the College.

- **“Exploitation”** means the use of a young person or vulnerable adult for someone else’s advantage, gratification or profit, often resulting in unjust, cruel or harmful treatment.
- **“Extremism”** is defined in the 2011 Prevent Strategy as vocal or active opposition to fundamental British values including democracy, the rule of law, individual liberty, mutual respect and tolerance of different faiths and beliefs. Also included in the definition is extremism calls for the death of members of the UK armed forces, whether in this country or abroad.
- **“Prevent”** refers to the Prevent Strategy, published by the Government in 2011, which is part of the Government’s overall counter-terrorism strategy, CONTEST. The aim of the Prevent Strategy is to reduce the threat to the UK by stopping people becoming terrorists or supporting terrorism.
- **“Radicalisation”** refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.
- **“Safeguarding”** is the process of protecting vulnerable people, whether from crime or other forms of abuse.
- **“Terrorism”** is defined in the Terrorism Act 2000 (TACT 2000). In summary, this defines terrorism as 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.
- **“Vulnerable adult”** means any person aged 18 or over who is or may be in need of community care services by reason of mental or other disability, age or illness and is or may be unable to take care of themselves, or unable to protect themselves against significant harm or exploitation. It should be noted that the definition of a vulnerable adult means that this can be a transient category for some individuals.

5.2 Definitions of Abuse

Abuse of children can be categorised into four areas (as defined by the Children’s Act 1989):

- 5.2.1 **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 care-givers);
 - or
 - ensure access to appropriate medical care or treatment.
 - it may also include neglect of, or unresponsiveness to, a child’s basic emotional needs.

5.2.2 **Physical abuse** includes 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.

5.2.3 **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 children that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond the 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 children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, though it may occur alone.

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

5.3 Child on Child abuse

5.3.1 The abuse of children by other children is a specific safeguarding issues in education and **all** staff should be made aware of it and understand the importance of challenging this behaviour.

5.3.2 Child on Child abuse is likely to include:

- Bullying (including cyberbullying).
- Abuse in intimate personal relationships between peers.
- Physical abuse including an online element which facilitates, threatens and or encourages physical abuse.
- Sexual violence including an online element which facilitates, threatens and or encourages sexual violence.
- Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment.
- Causing someone to engage in sexual activity without consent.
- Consensual and non-consensual sharing of nudes and semi-nude images and or videos (sexting).

- Up skirting, involving taking a picture under a person's clothing without permission.
- Initiation / hazing type violence and rituals as a way of initiating someone into a group.

5.4 Additional issues

5.4.1 In addition, Keeping Children Safe in Education identifies that there are wider safeguarding issues that should be considered and acted upon. The statutory guidance lists specific issues and provides further links to information on all these areas. The specific areas are:

- Child sexual exploitation
- Child criminal exploitation
- Domestic violence
- Fabricated or induced illness
- Female genital mutilation (FGM)
- Gangs and youth violence
- Mental health (this includes mental health as an indicator of abuse and mental health issues that are safeguarding concerns)
- Radicalisation
- Teenage relationship abuse
- Bullying, including Cyberbullying
- Online abuse
- Drugs
- Faith abuse
- Forced marriage
- Gender-based violence / violence against women and girls
- Honour-based abuse
- Private fostering
- Trafficking.

6. CONFIDENTIALITY

6.1 Confidentiality and trust should be maintained as far as possible. The degree of confidentiality will be governed by the need to protect the child, young person or vulnerable adult who is always the primary concern. The child, young person or vulnerable adult must, at the earliest opportunity in the disclosure, be informed of the need to pass the information on.

6.2 The College will comply with the requirements of the Data Protection Act 2018, and the UK General Data Protection Regulation which allows for the disclosure of personal data where necessary to protect the vital interests of the vulnerable adult.

6.3 In some cases the main restrictions on disclosure of information are:

- Common Law duty of confidence.
- Human Rights Act 1998.

- Data Protection Act 2018.
- UK GDPR.

- 6.4 Each of these must be considered separately. Other statutory provisions may also be relevant, but in general, legislation does not prevent the sharing of information if:
- Those likely to be affected provide their consent.
 - The public interest in safeguarding the child's welfare overrides the need to keep the information confidential.
 - Disclosure is required under a court order or other legal obligation.

7. RAISING CONCERNS ABOUT THE SAFEGUARDING PRACTICES WITHIN THE COLLEGE

- 7.1 All staff, volunteers, sub-contract partners and students should feel able to raise concerns about poor or unsafe practice and potential failures within the College's safeguarding policies and procedures and know that such concerns will be taken seriously by the College's Senior Leadership Team.
- 7.2 Staff, volunteers, sub-contract partners and students should follow the Whistleblowing Policy if they have any concerns about the practices at the College.
- 7.3 Where they do not feel able to use the College policies, the NSPCC Whistleblowing helpline is available and details are available on the safeguarding pages of IntranetPlus.

8. GOVERNANCE

- 8.1 Safeguarding will be managed within the College through the Safeguarding Committee that will meet at least four times each academic year. The Committee, chaired by the Deputy Principal, will report to the Corporation via the Senior Leadership Team. Membership will be in accordance with the Committee's Terms of Reference.
- 8.2 The responsibility of the Committee is to:
- Ensure the review and implementation of the Safeguarding & Prevent Policy
 - Review trends, themes and the College's response to these
 - Monitor and review the process of DBS checking and recording of staff, students, governors, volunteers and partners
 - Ensure the appropriate level of training is completed by all staff and volunteers
 - Review the effectiveness of safeguarding and Prevent processes through scrutiny of case, internal and external audits
 - Ensure policies on bullying, harassment and discrimination are implemented, monitored and reviewed
 - Review and monitor the E-Safety Policy
 - Consider any emerging issues related to the radicalisation and the Prevent Agenda.
 - Review Care Experienced Young People's progress and the College's actions to safeguard and support

9. REFERENCES

9.1 This policy has been developed in accordance with and under the guidance of the:

- Children's Act 1989 and 2004.
- Education Act 2002 and 2011.
- Keeping Children Safe in Education (Sep 2022).
- Working Together to Safeguard Children (Updated 2020).
- Safeguarding Children and Vulnerable Groups Act (2006).
- Safeguarding Children and Safer Recruitment in Education (2007).
- Counter Terrorism and Border Security Act 2019
- Leicester City, Leicestershire & Rutland Safeguarding Children Partnership Inter-agency Child Protection Procedures and Practice Guidelines.
- Leicester College Recruitment and Selection Policy.
- Leicester College Missing Student Procedure.

10. MEASURES

10.1 The effectiveness of this Policy will be monitored and measured in a variety of ways. These will include:

- Regular reporting on safeguarding incidents to the Safeguarding Committee and Governing Body.
- Measuring staff confidence in managing safeguarding incidents.
- Individual training and development records.
- Development of appropriate mechanism for assessing experience of those reporting safeguarding concerns, or being subject to safeguarding enquiries.
- Feedback from partners on quality and appropriateness of referrals.

11. APPENDICES

Appendix 1: Leicester College Safeguarding Procedures

Appendix 2: Leicester College Safeguarding structure and contacts

Appendix 3: References and further guidance

APPENDIX 1: LEICESTER COLLEGE SAFEGUARDING PROCEDURES

1. Introduction

The Leicester College Safeguarding Policy establishes the principles within which the College will work to ensure the safety and welfare of all children, young people and vulnerable adults at the College. This document is intended to provide practical guidance for colleagues who are responsible for taking action under the Policy, and should be read in conjunction with the Policy itself.

2. Responding to Concerns

2.1 Where any member of staff, student or governor has a concern about a student, they must report it immediately. There are a number of reasons why a student or staff member might need to report a concern:

- In response to something a student has said.
- In response to signs or suspicions of abuse.
- In response to allegations made against a member of staff, volunteer, carer or parent.
- In response to bullying, face to face or online.
- Observation of inappropriate behaviour / views.
- In response to anything which makes a student / young or vulnerable person uncomfortable.

It is important for College staff to note that if an incident has occurred outside of the College, it should still be reported.

2.2 On receipt of safeguarding information regarding a child, young or vulnerable adult or member of staff:

- Stay calm.
- Reassure the person reporting their concern that they have done the correct thing in telling you.
- Listen carefully to what is being said and take them seriously.
- Do not promise confidentiality.
- Explain that you have a duty to tell the Safeguarding Team and that their concerns may be shared with others who could play a part in protecting them or the individual concerned.
- Reassure them that they will be involved in decisions about what will happen wherever possible. For concerns that involve potential risk to children, this cannot always be guaranteed.
- If they have specific communication needs, provide support and information in a way that is most appropriate to them, or seek support to do this.
- Do not be judgemental or jump to conclusions.
- Record in writing exactly what is being said, if you cannot do this at the time, then record immediately afterwards. See Section 4 for recording requirements.

3. Reporting Concerns

- 3.1 Any allegation, disclosure or suspicion of harm or abuse needs to be taken seriously and handled in a sensitive manner. Individual members of staff should never deal with disclosures in isolation.
- 3.2 **If at any point, there is a risk of immediate serious harm to a child, a referral should be made to Children or Adult Social Care immediately. Anyone can make a referral.** If this ever happens, the Designated Safeguarding Lead must be informed at the earliest opportunity.
- 3.3 On receipt of a concern, the matter must be reported immediately to the Safeguarding Team via 07825 175 729 for advice and support. Details of the Safeguarding Team are at Appendix 2.
- 3.4 The Designated Safeguarding Officer will discuss with you the concern or information you have.
- 3.5 It will be agreed following consultation with the DSL or DDSL what the next action will be, which may include the following:
 - Referral to the appropriate organisation.
 - Contact with the person reporting.
 - Contact with the parent(s) / guardian(s).
- 3.6 The Designated Safeguarding Officer will advise you of what further involvement you should have.
- 3.7 The Designated Safeguarding Officer will confirm in writing, where appropriate, to statutory agencies.

4. Recording Requirements

- 4.1 During or immediately after a disclosure record the following:
 - Names of those present during the disclosure / allegation.
 - Address and contact of the young person.
 - Date of birth.
 - Ethnic origin.
 - Other agencies already involved.
 - Date and time of the conversation.
 - Place where the alleged incident took place.
 - Brief description of the concern or allegation.
 - Any visible injuries.
 - Any alleged injuries.
 - Young person's preferred action.

- Next steps and follow up agreed.

5. Support

5.1 The College recognises that colleagues who have been involved with a child, young person or vulnerable adult who has suffered harm, or appears to be likely to suffer harm, may require support. Colleagues can obtain support from the Designated Safeguarding Officers, their line manager, union representative, HR or via the Employee Assistance Programme Helpline ().

6. Designated Safeguarding Officer Responsibilities

6.1 Designated Safeguarding Officers are well trained, experienced colleagues who are responsible for liaising with the appropriate statutory agencies in relation to safeguarding and child protection concerns.

6.2 Where the DSO decides that a referral is appropriate to statutory agencies, they must do so as soon as is practicable, and within 24 hours of receiving the allegation.

6.3 The name and contact details of the duty officer to whom the referral is made should be recorded within CPOMs.

6.4 The student and referring member of staff should be informed of the action being taken and the reasons for the decision. This should happen before Social Care are informed unless doing so would place the young person at greater risk. In this case, both the student and colleague should be contacted as soon as safety considerations for the young person permit.

6.5 There will be a monthly DSO meeting to discuss specific cases, lessons learnt and training and information opportunities.

7. Managing Allegations Against a Member of Staff

7.1 Managing allegations of abuse by members of staff must be in accordance with Keeping Children Safe in Education (DfE 2022) and Leicester City, Leicestershire & Rutland Safeguarding Children Partnership Allegations against Persons who Work with Children guidance.

7.2 This procedure should be applied when there is such an allegation or concern that a person who works with children, has:

- Behaved in a way that has harmed a child, or may have harmed a child;
- Possibly committed a criminal offence against or related to a child; or,
- Behaved in a way that indicates he / she is unsuitable to work with children.

7.3 These behaviours should be considered within the context of the four categories of abuse (i.e. physical, sexual and emotional abuse and neglect). These include concerns relating to inappropriate relationships between members of staff and

children or young people, for example:

- Having a sexual relationship with a child under 18 if in a position of trust in respect of that child, even if it claimed to be consensual (see ss16-19 Sexual Offences Act 2003);
- 'Grooming', i.e. meeting a child under 16 with intent to commit a relevant offence (see s15 Sexual Offences Act 2003);
 - Other 'grooming' behaviour which may not meet the criminal threshold, but gives rise to concerns of a broader child protection nature (e.g. inappropriate text / e-mail messages or images, gifts, socialising etc.); or,
- Possession of indecent photographs / pseudo-photographs of children.

7.4 Where concerns fall below these thresholds, they should still be reported in line with the College's [Low Level Concerns Policy](#)

7.5 All staff who have, or received concerns about, the conduct of any colleague, permanent, temporary or voluntary, must report the matter immediately. Any concerns should be reported to the Designated Safeguarding Lead and the Director of HR. If, within two hours of the initial concern arising, it has not been possible to contact the nominated member of staff, the matter must be reported to the Principal.

7.6 If the concern is in relation to the designated member of staff, the matter should be reported to the Principal.

7.7 If the concern is in relation to the Principal, the matter should be reported to the Chair of Governors.

7.8 The procedures laid down in the Leicester City, Leicestershire & Rutland Safeguarding Children Partnership should be followed: https://llrscb.proceduresonline.com/p_alleg_staff.html along with the Leicester College Code of Conduct and Disciplinary policy as appropriate.

8. Potential Indicators of Abuse

8.1 There are a number of common factors, which can be potential indicators of abuse in children, young people and vulnerable adults. It is important to remember that many of the characteristics and signs detailed can also be typical for some individuals, so whilst it is important to be vigilant in such matters, staff should also be tactful in their approach. This information is provided as a guide only and further support should be sought following the guidance in the Policy and Procedures documents where there are possible safeguarding concerns.

8.2 Potential indicators of physical abuse

- Injuries to any part of the body.
- Individuals who find it painful to walk, sit down, to move their jaws or are in some other kind of pain.
- Injuries which are not typical of the bumps and scrapes associated with regular activities e.g. injuries of an unusual shape / type or with very clearly defined marks that

may be the result of being hit with an object.

- The regular occurrence of unexplained injuries.
- Frequent injuries, where explanations may be confused.
- Conflicting explanations of how injuries were sustained.
- Furtive / secretive behaviour.
- Uncharacteristic aggression or withdrawn behaviour.
- Compulsive eating or sudden loss of appetite.
- Sudden ill co-ordination.
- Difficulty staying awake.
- Wider concerns about the family / home life situation.

8.3 Potential indicators of emotional abuse

- Poor attachment relationships with children.
- Unresponsive or neglectful behaviour towards the individual's emotional or psychological needs.
- Persistent negative comments about the individual.
- Inappropriate or inconsistent developmental expectations of the individual.
- Parental problems that supersede the needs of the child / vulnerable adult.
- Dysfunctional family relationships including domestic violence.
- Emotional indicators such as low self-esteem, unhappiness, fear, distress, anxiety.
- Behavioural indicators such as attention seeking, opposing, withdrawal, insecurity.
- Physical indicators such as failure to thrive / faltering growth, delay in achieving developmental, cognitive or educational milestones.

8.4 Potential indicators of sexual abuse

- Signs of blood or other discharge on the individual's clothes.
- Awkwardness in walking or sitting down.
- Stomach pains.
- Bed wetting.
- Tiredness.
- Extreme variations in behaviour e.g. anxiety, aggression or withdrawal.
- Sexually provocative behaviour or knowledge that is incompatible with the individual's age and understanding.
- Drawings and or written work which are sexually explicit and inappropriate for the context of the work (indirect disclosure).
- Direct disclosure.

8.5 Potential indicators of neglect

- Abnormal growth including failure to thrive.
- Recurrent infection.
- Unkempt dirty appearance.
- Poor body hygiene.
- Inadequate / unwashed clothes.
- Hunger.
- Listlessness.
- Attachment disorders.

- Indiscriminate friendliness.
- Poor social relationships.
- Poor concentration.
- Developmental delays.
- Low self-esteem.
- Insufficient food, heating and ventilation in the home.
- Risk from animals in the household.
- Inappropriate sleeping arrangements and inadequate bedding.
- Dangerous or hazardous environment.

8.6 Potential indicators of radicalisation

There is no single way of identifying who is likely to be vulnerable to being drawn into terrorism or radicalisation. HM Government 'Channel' guidance indicates factors which may have a bearing on someone becoming vulnerable can include:

- Peer pressure.
- Influence from other people or via the internet.
- Bullying.
- Crime against the individual or their involvement in crime.
- Anti-social behaviour.
- Family tensions.
- Race / hate crime.
- Lack of self-esteem or identity.
- Personal or political grievances.

8.6.1 Assessment for vulnerability uses a consistently applied vulnerability assessment framework built around three criteria These are:

- Engagement with a group, cause or ideology.
- Intent to cause harm.
- Capability to cause harm.

8.7 Potential Indicators of engagement with an extremist group, cause or ideology

- Spending increasing time in the company of other suspected extremists.
- Changing their style of dress or personal appearance to accord with the group.
- Day-to-day behaviour becoming increasingly centred on an extremist ideology, group or cause.
- Loss of interest in other friends and activities not associated with the extremist ideology, group or cause.
- Possession of material or symbols associated with an extremist cause (e.g. the swastika for far right groups).
- Attempts to recruit others to the group / cause / ideology.
- Communications with others that suggest identification with a group / cause / ideology.

8.8 Potential indicators of Child Criminal Exploitation

CCE is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any **criminal** activity in exchange for something the victim needs or wants, and/or for the financial or other advantage of the

perpetrator or facilitator and/or through violence or the threat of violence.

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

8.9 Potential indicators of Child Sexual Exploitation

CSE occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into **sexual** activity in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator.

In addition to the above indicators of CCE, indicators of CSE can be:

- Students who have older boyfriends or girlfriends.
- Students who suffer from sexually transmitted infections or become pregnant.

8.10 Child on Child abuse

8.10.1 Child on Child abuse is a specific form of abuse, that whilst covered within the categories outlined in the policy and procedures, requires a specific focus within the College as it is recognised that it is a particularly sensitive and complex area of safeguarding students within the College.

8.10.2 All staff should recognise that students are capable of abusing their peers and that inappropriate behaviour should never be tolerated or passed off as 'banter' or 'part of growing up'.

8.10.3 Child on child abuse is often gender specific, such as girls being inappropriately touched or sexually abused by boys; boys may be more vulnerable to initiation or hazing type violence and rituals.

8.10.4 Types of child on child abuse include:

- Physical abuse such as:
 - Biting.
 - Kicking.
 - Hitting.
 - Hair pulling.
- Sexually harmful behaviour such as:
 - Inappropriate language.
 - Touching.
 - Sexual assault.
- Bullying, which can be:
 - Physical.
 - Name calling.
 - Homophobic etc.

- Cyberbullying
- Sexting (also known as youth produced sexual imagery)
- Initiation / hazing
- Prejudiced behaviour
- Teenage relationship abuse
- Up-skirting

8.10.5 Expected response from staff

It is important to deal with a situation of peer abuse immediately and sensitively. As with any safeguarding concern, it is important to gather the information as soon as possible to ascertain the true facts. This should be done objectively, with consideration of intent. Where it is deemed that any party involved in the peer on peer abuse is at risk, then a safeguarding referral should be made. Where there is a potential criminal act, the police should also be informed.

9. Dealing with sexting (or youth produced sexual imagery)

9.1 The College will make reference to the UKCIS guidance when dealing with incidents of sexting. All incidents of sexting should be initially dealt with as a safeguarding concern, and the College will be guided by the principle of proportionality and the primary concern at all times will be the welfare and protection of the young people involved.

9.2 The incident will be referred to the police and/or social care immediately if:

- The incident involved an adult;
- There is reason to believe the young person is being coerced, blackmailed or groomed, or there are concerns about their capacity to consent;
- The imagery suggests sexual acts that are unusual for the young person's developmental stage, or are violent;
- The imagery involved sexual acts and any young person under the age of 13 (i.e below the age of legal consent); or,
- There is reason to believe a young person is at immediate risk of harm owing to the sharing of the imagery, for example the young person is presenting as self-harming.

9.3 The DSL should be notified as soon as is practicable of the referral if they have not been involved in the original decision to refer.

9.4 If none of the above apply, the usual safeguarding process should be applied.

10. Sexual harassment and violence

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

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

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

- Rape: A person (A) commits an offence of rape if: he intentionally penetrates the vagina, anus or mouth of another person (B) with his penis, B does not consent to the penetration and A does not reasonably believe that B consents.
- Assault by Penetration: A person (A) commits an offence if: s/he intentionally penetrates the vagina or anus of another person (B) with a part of her/his body or anything else, the penetration is sexual, B does not consent to the penetration and A does not reasonably believe that B consents.
- Sexual Assault: A person (A) commits an offence of sexual assault if: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents.

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

- A child under the age of 13 can never consent to any sexual activity
- A child under 18 cannot consent to any sexual activity with a person in a position of trust
- The age of consent is 16, which is when young people can legally take part in sexual activity
- Sexual intercourse without consent is rape.

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

10.6 Sexual harassment creates an atmosphere that, if not challenged, can normalise inappropriate behaviours and provide an environment that may lead to sexual violence/harm. Leicester College therefore recognises the importance of recognising the nature of, identifying and challenging sexual violence/harm and sexual harassment in its wider approach to safeguarding and promoting the welfare of children through policies and the curriculum. All staff recognise the importance of:

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

10.7 The College will respond to reports in accordance with Part 5 of Keeping Children Safe in Education 2022. All responses to reports of sexual violence/harm will be subject to an immediate risk and needs assessment undertaken by the DSL (or a deputy), using their professional judgement and supported by other agencies, such as children’s social care and the Police. The need for a risk and needs assessment in relation to reports of sexual harassment will be considered on a case-by-case basis.

11. Online Safety

11.1 Due to an increase in online learning, it is essential that students are safeguarded from potentially harmful and inappropriate online material. Additionally, any safeguarding concerns that are identified by staff when online should be reported in the same manner and urgency, using Leicester College Safeguarding Procedures.

11.2 Staff should ensure that they adhere to the guidance regarding **Online Safeguarding Processes** applicable to all online learning, support and communication with students.

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11.3 Leicester College has robust filtering and monitoring systems installed on all College owned devices. Any breaches to the online safety standards should be referred through the usual safeguarding process.

11.4 All users, all students and staff, all members of the College community who have access to the College IT systems, both on the premises and remotely, have a role in ensuring that e-Safety is embedded within the organisation. Any user of systems must adhere to and sign a hard copy of the e-Safety Rules and the Acceptable Use Policy

APPENDIX 2 – SAFEGUARDING STRUCTURE FOR LEICESTER COLLEGE

Designated Safeguarding Lead:	Shabir Ismail, Deputy Principal Finance and Resources	07766 920296
Deputy Designated Safeguarding Lead:	Zoé Butler, Director of Student Services & Marketing	07717 508185
Safeguarding Officer	Maarya Alli	07825 175729
Designated Safeguarding Officers	Melanie Arrowsmith-Kemp	07825 011587
	Sharon Drury	07917 628 688
	Joanne Keogh	07919 394923
	Gail Pringle	07971 198967

APPENDIX 3 - REFERENCES

Legislation

Children Act 1989

Children Act 2004

Safeguarding Vulnerable Groups Act 2006

Children and Families Act 2014

Section 175 of the Education Act

2002 Female Genital Mutilation Act

2003 Children and Young Persons

Act 2008 Education Act 2011

Local procedures & guidance

Leicester City, Leicestershire and Rutland Safeguarding Children Partnership procedures

<https://llrscb.proceduresonline.com/index.htm>

National Guidance

[Working together to safeguard children](#) (updated 2020)

[Keeping children safe in education \(2022\)](#)

[Multi Agency Practice Guidelines on Female Genital Mutilation](#)

[Multi Agency Practice Guidelines on Forced Marriage](#)

[What to do if you are worried a child is being abused](#)

[Safeguarding disabled children - Practice guidance, July 2009](#)

[Safeguarding children who may have been trafficked](#)

[Safeguarding children in whom illness is fabricated or induced](#)

[Safeguarding children and young people from sexual exploitation,](#)

[Prevent duty guidance: for further education institutions in England and Wales](#)

[Sharing nudes and semi-nudes: advice for education settings](#)

[Sexual violence and sexual harassment between children in schools and colleges](#)

Director of Student Services & Marketing

July 2022

