

Safeguarding and Child Protection Policy

Review 12
Created October 2004
Last Reviewed September
2021

Safeguarding and Protection Policy

1 Purpose

- 1.1 To safeguard and protect the welfare of our learners
- 1.2 In doing this the College fulfils its moral and statutory duty in accordance with legislation (detailed on page 3) and the Children's Safeguarding Assurance Partnership (SCAP).

2 Scope/Terms

- 2.1 All College learners who are under the age of 18 or vulnerable adults.
- 2.2 A vulnerable adult is a person aged 18 years or over who may be unable to take care of themselves, or protect themselves from harm or from being exploited. This may be because they have a mental health problem, a disability, a sensory impairment, are old and frail, or have some form of illness (<http://www.lancashire.gov.uk/acs/sites/safeguarding>).
- 2.3 For the purpose of this Policy, 'staff' includes College Governors, employed and voluntary staff.

3 Policy Statement

- 3.1 Burnley College has a duty to safeguard and protect the welfare and well-being of its learners and staff. **This statement applies to all College staff, College Governors, contractors, visitors and volunteers**
- 3.2 There are three main strands to our Safeguarding and Protection Policy
 - a **Prevention**

By promoting a positive College culture, through pastoral support to learners and by creating and maintaining a safe learning environment
 - b **Protection**

By following agreed procedures, ensuring staff are trained and supported to respond appropriately and sensitively to Safeguarding and Protection concerns. The Data Protection Act 2018 and GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe.
 - c **Support**

To learners who may have been subject to abuse or neglect or from high risk families (Domestic Violence, substance misuse, mental health and parents with learning disability, children in the court system as witnesses and children with family members in prison) or marginalised groups.

4 College Commitment

- 4.1 We recognise that high self-esteem, confidence, peer support and clear lines of communication with trusted adults help all learners.
- 4.2 Burnley College is committed to:
- a establishing and maintaining an environment in which learners feel secure, are encouraged to talk and are listened to and are able to recognise when they are at risk and how to get help where they need it
 - b ensuring that learners are taught about safeguarding, including keeping themselves safe online exploring in more detail: **Content** which links to being exposed to illegal, inappropriate or harmful content, **Contact** which links to being subjected to harmful online interaction with other users, **Conduct** which links to personal online behaviour that increases the likelihood of, or causes harm and **Commerce** which links to risks of online gambling, inappropriate advertising, phishing and or financial scams. This activity will take place through various teaching and learning opportunities, as part of providing a broad and balanced curriculum. Learners are taught to recognise when they are at risk and how to get help when they need it. If students or staff are at risk, it will be reported to the Anti-Phishing Working Group (<https://apwg.org/>).
 - c ensuring that whilst in College all external web traffic is monitored and analysed by the Burnley College firewall. Any inappropriate or unsafe content is blocked with all personal devices using the same filtering protocols as all Burnley College devices and any attempted breaches are flagged, with appropriate parties informed and action taken as appropriate
 - d ensuring that learners know that there are staff in the College who they can approach if they are worried or in difficulty
 - e ensuring that every effort will be made to establish effective working relationships with parents and colleagues from other agencies.
- 4.3 Burnley College will within a culture of vigilance
- a prevent people who pose a risk of harm from working with learners
 - b ensure learners are kept safe and challenge poor and unsafe practices
 - c foster a culture of trust between adults who work at the College and the learners who attend it

- d assess the risks and issues in the wider community when considering the wellbeing and safety of learners
- e contribute to effective partnership working between all those involved with providing safeguarding services for learners
- f work with partners to provide a co-ordinated offer of early help when additional needs of learners are identified.

5 Allegations of Abuse

- 5.1 Any allegations of abuse made against a learner will be dealt with under the relevant policy which could be the Safeguarding and Child Protection Policy and/or the Student Disciplinary Procedure (002_P01)
- 5.2 Any allegations of abuse or concerns about the conduct of a member of staff, supply teachers, volunteers or contractors should be reported to the Principal and will be dealt with under the Staff Disciplinary Procedure. The Principal will decide whether the concern is an allegation or low-level concern and appropriate action will be taken which could include a referral to the Local Authority Designate Officer for child protection concerns as appropriate. LADO.Admin@lancashire.gov.uk Tel. 01772 536694.
- 5.3 Any allegations of abuse made against the Principal will be dealt with by David Meakin the Chair of the Governing Board (d.meakin@burnley.ac.uk)

Related Procedures and Documentation that staff should be aware of and have access to:

- 002 Student Entitlement Policy
- 002_P01 Student Disciplinary Procedure
- 002_P02 Student Representation Procedure
- 002_P03 Parental Involvement Procedure
- 002_P04 Induction and Tutorial Procedure
- 002_P05 Complaints Procedure
- 002_P06 Visits and Residentials Procedure
- Equality and Diversity Policy
- Health and Safety Policy
- Staff Disciplinary Procedure
- Recruitment of Ex-Offenders Policy Privacy Policy
- Staff Recruitment and Selection Procedures (including safer recruitment)
- College Charter
- Family Safeguarding Model (SCAP)
- Whistle Blowing Code of Practice

The legislative guidance relevant to safeguarding and promoting the welfare of children is:

- The obtaining of criminal records disclosures or barred checks rely on powers to check which are in the Police Act 1997 (Criminal Records) Regulations 2007, and Rehabilitation of Offenders Act 1975 Exceptions Order – both as amended
- The Children Act 1989 and 2004
- Education Act 2002
- Safeguarding Vulnerable Groups Act 2006 as amended
- Guidance for Safer Working Practices for Adults Who Work with Children, and Young People in Education Settings 2009
- Domestic Abuse Act 2021
- Protection of Freedoms Act 2012
- Working Together to Safeguard Children February 2019
- Keeping Children Safe in Education September 2021
- Counter Terrorism and Security Act 2018 including prevent duty guidance
- Information Sharing Advice for practitioners providing safeguarding services to children, young people, parents and carers March 2018
- Sexual Violence and Sexual Harassment Between Children September 2021
- Sharing nudes and semi-nudes: advice for education settings working with children and young people December 2020
- The Serious Crime Act 2015
- Searching, Screening and Confiscation January 2018
- Mandatory Reporting of Female Genital Mutilation – Procedural Information 2020

Responsibility

This policy is the responsibility of the Deputy Principal – Strategic Designated Safeguarding Lead

Last reviewed *September 2021*

Review dates for this policy

Review Date	Changes made	By whom
September 2021	Additional updates re commerce and sexual abuse/harassment in line with current Legislation changes.	Simon Jordan
June 2021	Additional Updates in line with current legislation; addition of Operation Encompass information and updates Team Roles and Contact Details	Angela Donovan
June 2020	Additional updates in line with current legislation.	Angela Donovan
June 2019	Team Roles and Contact Details updated. Additional updates in line with current legislation.	Angela Donovan
June 2018	Team roles and responsibilities updated. Updated in line with Keeping Children Safe in Education – new guidance.	Angela Donovan
June 2017	Alternative contact names and numbers removed, LADO phone will now be staffed full time, policy responsibilities updated.	Karen Buchanan
June 2016	Updated in line with Keeping Children Safe in Education May 2016. Alternative contact names and numbers updated in case of LADO absence. Updated in line with staffing changes, updated Keeping Children Safe in Education September 2016.	Alison Cameron Brandwood
Oct 2015	Alternative contact names and numbers updated in case of LADO absence.	Alison Cameron Brandwood

Aug 2015	Updated in line with Keeping Children Safe in Education July 2015	Alison Cameron Brandwood
May 2015	Updated in line with staffing changes, Counter Terrorism and Security Act 2015 and updated Keeping Children Safe in Education March 2015.	Alison Cameron Brandwood
Nov 2014	Updated in line with staffing changes.	Alison Cameron Brandwood
June 2014	Updated in line with Keeping Children Safe in Education April 2014	Alison Cameron Brandwood
April 2013	Updated in line with Working Together to Safeguard Children March 2013	Alison Cameron Brandwood
August 2012	Updated in line with changes to Designated Senior Person	Karen Buchanan
Nov 2009	Updated in line with Safeguarding Vulnerable groups Act 2006	Chris Keogh
Feb 2007	Updated in line with DfES guidance 'Safeguarding Children and Safer Recruitment in Education'	Chris Keogh
October 2004	Updated in line with guidance from LEA Child Protection Officer	

Annex A

6 Team Roles and Responsibilities

Names of staff/personnel in teams with specific responsibility for Safeguarding and Protection (Academic Year 2021-2022)

Team	Team Members	Ext No	
The Management Safeguarding and Protection Team	Strategic Designated Safeguarding Lead	Simon Jordan	3102
	Safeguarding and Prevent Manager & Operational DSL	Tracy Kennedy	3332
	Curriculum Manager A Levels	Liam O'Malley	3259
	Curriculum Manager Engineering	Matthew Harwood	3495
	Curriculum Manager Construction	Ralph Stone	3089
	Curriculum Manager FACS	Susan Connor	3056
	Curriculum Manager HSD	Lorraine P Jones	3477
	Curriculum Manager MANDE	Diane Gott	3029
	Curriculum Manager CIC	Ed Foulds	3390
	Dean of University Studies	Nina Parkin	3187
Designated Safeguarding and Protection Team	Strategic Designated Safeguarding Lead	Simon Jordan	3102
	Safeguarding and Prevent Manager & Operational Designated Safeguarding Lead	Tracy Kennedy	3332
	Safeguarding and Emotional Wellbeing Officer	Charlotte Ashworth	3321
	University Safeguarding Officer	Nina Parkin	3187
	Safeguarding Officer	Lorraine P Jones	3477

6.1 All adults working with, or on behalf of, learners have a responsibility to protect them. The appropriate training is detailed in Annex C and roles and responsibilities are as follows:

6.2 All staff

Where staff suspect a safeguarding and protection issue, they must in all cases be referred to the Designated Safeguarding and Protection team. If a member of the team is not immediately available staff should contact the Designated Safeguarding Lead (DSL) or any other member of the senior management team, including the Principal or take advice from local children's social care

If staff have concerns out of hours and are not able to contact the DSL or a member of SMT the following advice should be followed:

Life threatening situation:

- Ring for an ambulance and/or contact the police on 999 or 101 non-emergency
- If you think a child, young person or vulnerable adult is being abused or mistreated or you have concerns about a child young person or vulnerable adult's well-being you should call and speak to someone at one of the following numbers:

NSPCC Helpline Children (Under 18) 0808 800 5000 email help@nspcc.org.uk text 88858 (free service) or complete [online form](#)

Lancashire Children's Services Duty and Advice for Children (Under 18) - 0300 123 6720

Lancashire Adult Social Care for Adults (18+) - 0300 123 6721

The College is clear that it is not the responsibility of any member of staff to investigate any suspected cases of abuse however all staff should;

- a have knowledge and understanding of safeguarding and protection issues including the signs and symptoms of abuse, neglect, physical, emotional, sexual, child exploitation and grooming, female genital mutilation, (teachers must personally report to the police cases where they discover that an act of FGM appears to have been carried out; and discuss any such cases with the safeguarding lead and children's social care. The duty does not apply in relation to at risk or suspected cases. The Serious Crime Act 2015 sets a statutory duty on professionals including teachers to notify police when they discover FGM appears to have been carried out on a girl under 18,) honour based violence, honour based violence (HBV)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.
- b all forms of so called HBV are abuse, emotional health and self-harm, homelessness, County lines, peer on peer abuse and preventing terrorism. Where staff are concerned that learners are developing extremist views or show signs of becoming radicalised they must liaise with the Safeguarding Team.
- c understand the importance of absence as a possible indicator of abuse and neglect and that absence may also raise concerns about others safeguarding issues, including criminal and sexual exploitation. College teams monitor attendance carefully and address poor or irregular attendance without delay. Tutors will always follow up with parents/carers when learners fail to attend timetabled sessions with explanation. The College is clear that we need to have at least two up to date contacts numbers for parents/carers. Parents should remember to update College as soon as possible if the numbers change.

- d undertake safeguarding training/updating all staff annually. Records of all Safeguarding training will be maintained centrally and reported to the Curriculum and Standards Committee of the Governing Board on an annual basis
- e consider and apply safe working practices in accordance with guidance (identified on page 3 on Safeguarding and Protection Policy).
- f report and record safeguarding and protection issues in line with College policy and procedures.
- g carry out lawful learner searches in line with the Searching, Screening and Confiscation guidance January 2018
- h ALL staff and volunteers understand what domestic abuse is and the potential impact upon children and how this might be displayed.
- i 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.
- j 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.
- k 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.
- l Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child/adolescent to parent violence and abuse. Anyone can be a victim of domestic abuse, regardless of sexual identity, age, ethnicity, socio-economic status, sexuality or background and domestic abuse can take place inside or outside of the home.
- m The National Domestic Abuse helpline can be called free of charge and in confidence, 24 hours a day on 0808 2000 247.
- n The DSL will: -
- ensure that the College has suitably trained Key Adult/s to fulfil its obligations under Operation Encompass
 - ensure that the College's commitment to Operation Encompass is known throughout the College via the means of staff training, information shared via the College website
 - the College will provide an overview of Operation Encompass with the names of the Op Encompass leads and a link to the Op Encompass website. (<https://www.operationencompass.org/>)

About Operation Encompass

Operation Encompass is a police and education early information sharing partnership-enabling colleges to offer immediate support for young people experiencing domestic abuse and other traumatic experiences. The police with a college's trained Key Adult (DSL) share information prior to the start of the next college day after officers have attended a domestic abuse incident thus enabling appropriate support to be given, dependent upon the needs and wishes of the young person.

Young people experiencing domestic abuse are negatively impacted by this exposure; domestic abuse has been identified as an Adverse Childhood Experience and can lead to emotional, physical and psychological harm. Operation Encompass aims to mitigate this harm by enabling immediate support, making a young person's day better and giving them a better tomorrow.

6.3 The Management Safeguarding and Protection Team (MSAPT)

In addition to staff duties the MSAPT will

- a co-ordinate and review the learners identified on the divisional At-Risk register
- b have awareness of their divisional safeguarding case load
- c promote effective safeguarding practices.

6.4 The Designated Safeguarding and Protection Team (DSAPT)

In addition to staff duties, the DSAPT will

- a respond to safeguarding concerns
- b initiate internal investigation
- c make referrals to, and liaise with internal/external agencies
- d liaise with learner /family/carer or guardian as appropriate
- e facilitate support for staff following safeguarding disclosures
- f review safeguarding cases
- g review and update Safeguarding and Protection policies and procedures
- h provide updates to the Management Safeguarding and Protection Team.

Annex B

7 Specific Roles and Responsibilities

7.1 The broad areas of responsibility for the Strategic Designated Safeguarding Lead and Operational Designated Safeguarding Lead, the Principal and the Governing Board are as follows:

7.2 The **Strategic Designated Safeguarding Lead and Operational Designated Safeguarding Lead (SDSL & ODSL)**

7.2.1 Managing referrals

- a Refer all cases of suspected abuse to the local authority children's social care and:
 - the designated officer for child protection concerns (all cases which concern a staff member)
 - disclosure and Barring Service (cases where a person is dismissed or left due to risk/ harm to a child); and/or
 - police (cases where a crime may have been committed)
- b Liaise with the Principal to inform him/ her, where necessary, of issues especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations
- c Act as a source of support, advice and expertise to staff on matters of safety and safeguarding and when deciding whether to make a referral by liaising with relevant agencies
- d To offer support and guidance to learners presenting with acute mental health concerns including suicidal ideation and suicide attempt. In this instance the safeguarding team will risk assess and contact the learners General Practitioner to inform of risk and intent. In appropriate circumstances the safeguarding team will contact the learners parents or guardians. In all instances learners will be encouraged to inform parents where it is safe to do so.

7.2.2 Training

- a Undertake appropriate training carried out every two years to keep knowledge and skills up to date
- b Understand the assessment process for providing early help and intervention, for example through locally agreed common and shared assessment processes such as early help assessments
- c Have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so
- d Ensure each member of staff has access to and understands the College's safeguarding and child protection policy and procedures, especially new and part time staff. All new staff will be provided with a hard copy of the Safeguarding and Child Protection Policy
- e Be alert to the fact that safeguarding issues can manifest themselves via peer on peer abuse. This is most likely to include but not limited to: Bullying (including cyberbullying), physical abuse such as hitting, kicking, biting; sexual violence and sexual harassment; gender-based violence; sexting and initiation type violence rituals. Ensuring each member of staff has access to and is aware of the appropriate recording, referral and investigative mechanisms for dealing with peer-on-peer abuse. The victims of peer-on-peer abuse would be supported through appropriate pastoral and referral routes. Perpetrators of such abuse will also be supported in line with current guidance and College procedures.
- f Be alert to the specific needs of children in need, 'those with special educational needs and young carers, looked after and previously looked after children and those with challenging behaviours
- g Be alert to the possibility that children with Special Educational Needs or disabilities (SEND) or certain health conditions can face additional safeguarding challenges. The College identifies pupils who might need more support to be kept safe or to keep themselves safe providing specific curriculum sessions that place a focus on safeguarding issues alongside extensive support and guidance sessions.

¹ Section 17 (10) Children Act 1989; those unlikely to achieve a reasonable standard of health and development without local authority services, those whose health and development is likely to be significantly impaired without the provision of such services, or disabled children.

- h Be alert to the fact that it is a mandatory duty to inform the local authority where a private fostering arrangement is in place for a learner with disabilities under 18. A private fostering arrangement is one that is made privately (without the involvement of a local authority) for the care of a child under the age of 16 years (under 18, if disabled) by someone other than a parent or close relative, in their own home, with the intention that it should last for 28 days or more. A close family relative is defined as a 'grandparent, brother, sister, uncle or aunt' and includes half-siblings and step-parents; it does not include great aunts or uncles, great grandparents or cousins. Parents and private foster carers both have a legal duty to inform the relevant local authority at least six weeks before the arrangement is due to start; not to do so is a criminal offence. College staff should notify the designated safeguarding lead when they become aware of private fostering arrangements. The designated safeguarding lead will speak to the family of the learner involved to check that they are aware of their duty to inform the LA. The college itself has a duty to inform the local authority of the private fostering arrangements.
- i Be able to keep detailed, accurate, secure written records of concerns and referrals
- j Obtain access to resources and attend any relevant or refresher training courses
- k Encourage a culture of listening to learners and taking account of their wishes and feelings, among all staff, in any measures the College may put in place to protect them to ensure that a contextualised approach to safeguarding is taken.

7.2.3 **Raising Awareness**

- a Ensure the College's policies are known and used appropriately.
 - b Ensure the College's safeguarding and child protection policy is reviewed annually, and the procedures and implementation are updated and reviewed regularly, and work with the governing body regarding this
 - c Ensure the College's safeguarding and child protection policy is available publicly and parents are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the College in this
 - d Link with the local Children's Safety Assurance Partnership to make sure staff are aware of training opportunities and the latest local policies on safeguarding and current issues and priorities
 - e Where learners leave the College ensure their safeguarding and protection file is forwarded for any new educational establishment

7.3 The **Principal**

In addition to staff duties detailed in Annex A, 6.2, the Principal will ensure that

- a sufficient resources and time are allocated to enable the designated safeguarding lead and other staff to discharge their responsibilities, including taking part in strategy discussions and other inter-agency meetings, and contributing to the assessment of children and vulnerable adults
- b all staff and volunteers feel able to raise concerns about poor or unsafe practice in regard to children and vulnerable adults, and such concerns are addressed sensitively and effectively in a timely manner in accordance with legislation

7.4 The **Governing Board**

In addition to staff duties detailed in Annex A 6.2, the Governing Board will ensure that

- a the College has an effective Safeguarding and Child Protection Policy and procedures and processes for monitoring compliance with them
- b an appropriate senior member of staff is designated to take lead responsibility for dealing with safeguarding and protection issues, providing advice and support to other staff, liaising with the Local authority and working with other agencies
- c the College has a designated Safeguarding Governor - David Brown who is Vice Chair of the Board (D.Brown@burnley.ac.uk)
- d the College has Safeguarding and Child Protection Policy and Procedures in place that are in keeping with locally agreed inter-agency procedures and the Policy is made available to learners/parents on request
- e the College operates safe recruitment procedures including making sure that statutory duties to check staff who work with learners are complied with and statutory guidance relating to volunteers is followed, that proportionate decisions are taken on whether to require any checks beyond that and recruitment panel members are properly trained
- f the College has procedures for dealing with allegations of abuse against members of staff and volunteers that follow any guidance from Government, the local authority and locally agreed inter-agency procedures
- g where the College provides education for pupils under 16 years of age who are on the roll of secondary schools, the Designated Safeguarding Lead liaises with the schools concerned and ensures that appropriate arrangements are in place to safeguard the children

- h in addition to basic safeguarding and protection training, the Designated Safeguarding Lead undertakes training in inter-agency working that is provided by, or to standards agreed by, the Children’s Safety Assurance Partnership (CSAP), and refresher training at 2 yearly intervals to keep his/her knowledge and skills up to date
- i all other staff who work with learners and vulnerable adults, undertake training to equip them to carry out their responsibilities for safeguarding and protection effectively, that is kept up to date by annual refresher and temporary staff and volunteers who work with learners are made aware of the College’s arrangements for safeguarding and protection and their responsibilities
- j staff are all trained in electronic referral recording and processes and understand how to utilise the system Safer Recruitment training is available to all relevant staff and governors who are involved in the recruitment process.
- k any deficiencies or weaknesses in regard to safeguarding and protection arrangements that are brought to its attention are remedied without delay
- l where there are concerns about the way that safeguarding is carried out in the College staff should refer to the Whistle-blowing Code of Practice. A whistleblowing disclosure must be about something that affects the general public such as: a criminal offence has been committed, is being committed or is likely to be committed, a legal obligation has been breached, there has been a miscarriage of justice, the health or safety of any individual has been endangered, the environment has been damaged, information about any of the above has been concealed. The NSPCC runs a whistleblowing helpline on behalf of the government, the number is 0808 800 5000.
- m an annual review of its policies and procedures and how the above duties have been discharged is undertaken

The Governing Board will exercise its responsibility through the Curriculum and Standards Committee and the Designated Safeguarding Lead will report annually on Safeguarding and Protection issues to that Committee.

Neither the Governing Board nor individual Governors have a role in dealing with individual cases or a right to know details of cases, except where exercising their disciplinary functions in respect of allegations against a member of staff.

Owned by	Simon Jordan – Deputy Principal
Last reviewed	September 2021
On College website	October 2021
Review Date	Annually

Appendix I

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A) INDICATORS OF COUNTY LINES EXPLOITATION

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one or more importing areas (within the UK), using dedicated mobile phone lines or other form of “deal line”.

Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to move (and store) drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure the compliance of victims. Children can be targeted and recruited into county lines in a number of locations including schools, further and higher educational institutions, pupil referral units, special educational needs schools, children’s homes and care homes. Children are often recruited to move drugs and money between locations and are known to be exposed to techniques such as ‘plugging’, where drugs are concealed internally to avoid detection. Children can easily become trapped by this type of exploitation as county lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network. One of the ways of identifying potential involvement in county lines are missing episodes (both from home and school), when the victim may have been trafficked for the purpose

If a child is suspected to be at risk of or involved in county lines, a safeguarding referral should be considered alongside consideration of availability of local services/third sector providers who offer support to victims of county lines exploitation. Like other forms of abuse, child criminal exploitation, including county lines: Further information on the signs of a young person’s involvement in county lines is available in guidance published by the Home Office.

B) SIGNS AND SYMPTOMS OF PEER ON PEER ABUSE

Staff should be aware that safeguarding issues can manifest themselves via peer on peer abuse This is most likely to include, but not limited to:

- a. bullying (including cyberbullying)
- b. physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm sexual violence and sexual harassment
- c. gender-based violence
- d. sexting (also known as youth produced sexual imagery)
- e. initiation-type violence and rituals.

Abuse is abuse and should never be tolerated or passed off as “banter” or “part of growing up”. Different gender issues can be prevalent when dealing with peer on peer abuse. This could for example include girls being sexually touched/assaulted or boys being subject to initiation-type violence. The college recognises that girls are more likely to be victims and boys’ perpetrators but all peer on peer abuse is unacceptable and will be taken seriously. We believe that all learners have a right to attend college and learn in a safe environment and they should be free from harm by adults in the school and other learners. We recognise that some learners will sometimes negatively affect the learning and wellbeing of others and their behaviour will be dealt with under the College’s Disciplinary Policy. Occasionally, allegations may be made against learners by others in the school, which are of a safeguarding nature. Safeguarding issues raised in this way may include physical abuse, emotional abuse, sexual abuse and sexual exploitation. It is likely that to be considered a safeguarding allegation against a pupil, some of the following features will be found.

The allegation:

- f. is made against an older pupil and refers to their behaviour towards a younger pupil or a more vulnerable pupil is of a serious nature, possibly including a criminal offence
- g. raises risk factors for other pupils in the school
- h. indicates that other pupils may have been affected by this learner
- i. indicates that young people outside the school may be affected by this learner

The College will support the victims of peer on peer abuse by ensuring all staff are aware of the electronic incident reporting system and how to access and use this system. All reports are sent through to the Operational DSL.

In cases where nudes or semi-nudes have been shared (previously known sexting) we follow guidance given to schools and colleges by the UK Council for Child Internet Safety (UKCIS) published in December 2020: Sharing nudes and semi-nudes.

C) SIGNS AND SYMPTOMS OF CHILD SEXUAL EXPLOITATION

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

Indicators of child sexual exploitation may include:

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

Potential vulnerabilities include:

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

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

More information can be found in:

Child sexual exploitation: Definition and a guide for practitioners (DfE 2017)

D) RISK FACTORS AND SYMPTOMS OF FEMALE GENITAL MUTILATION

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-school to visit an 'at-risk' country (especially before the summer holidays), or parents who wish to withdraw their children from learning about FGM.

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

E) EARLY INDICATORS OF RADICALISATION OR EXTREMISM

As part of the Counter Terrorism and Security Act 2015, schools have a duty to 'prevent people being drawn into terrorism'. This has become known as the 'Prevent Duty'. Where staff are concerned that children and young people are developing extremist views or show signs of becoming radicalized, they should discuss this with the Designated Safeguarding Lead. The Designated Safeguarding Lead has received training about the Prevent Duty and tackling extremism and is able to support staff with any concerns they may have. We use the curriculum to ensure that young people understand how people with extreme views share these with others, especially using the internet. We are committed to ensuring that our pupils are offered a broad and balanced curriculum that aims to prepare them for life in modern Britain. Teaching the school's core values alongside the fundamental British Values supports quality teaching and learning, whilst making a positive contribution to the development of a fair, just and civil society. Recognising Extremism:

- 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, art work 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

F) SIGNS AND SYMPTOMS OF ABUSE AND NEGLECT

Abuse: a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. They may be abused by an adult or adults or another child or children.

Physical abuse: a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

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

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

Neglect: the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

G) DETERMINING LEVELS OF CONCERN AND OUTCOME

Allegations or concerns about an adult working in the College whether as a tutor, supply tutor, other staff, volunteers or contractors

We recognise the possibility that adults working in the college may harm children, including governors, volunteers, supply tutors and agency staff. Any concerns about the conduct of other adults in the College should be taken to the Principal without delay; any concerns about the Principal should go to David Meakin the Chair of Governors who can be contacted by e-mail d.meakin@burnley.ac.uk

Any concerns about the conduct of a member of staff, supply tutors, volunteers or contractors should be reported to the Principal.

Concerns may come from various sources, for example, a suspicion; complaint; or disclosure made by a student, parent or other adult within or outside of the organisation; or as a result of vetting checks undertaken.

The Principal has to decide whether the concern is an allegation or low-level concern. The term 'low-level' concern does not mean that it is insignificant, it means that the behaviour towards a student does not meet the threshold for referral to the Local Authority Designated Officer (LADO) (see below).

Allegations

It is an allegation if the person* has:

- behaved in a way that has harmed a child, or may have harmed a child and/or;
- possibly committed a criminal offence against or related to a child and/or;
- behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children; and/or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children (also includes behaviour outside the college).

(*Person could be anyone working in the college that provides education for children under 18 years of age, including supply tutors, volunteers and contractors.)

Allegations should be reported to the LADO 'without delay'.

Before contacting the LADO, colleges should conduct basic enquiries in line with local procedures to establish the facts to help them determine whether there is any foundation to the allegation, being careful not to jeopardise any future police investigation.

The LADO's role is not to investigate the allegation, but to ensure that an appropriate investigation is carried out, whether that is by the police, children's social care, the college, or a combination of these.

Low-level Concerns

Concerns may be graded Low-level if the concern does not meet the criteria for an allegation; and the person* has acted in a way that is inconsistent with the staff code of conduct, including inappropriate conduct outside of work. Example behaviours include, but are not limited to:

- being over friendly with students;
- having favourites;
- taking photographs of student on their mobile phone;
- engaging with a student on a one-to-one basis in a secluded area or behind a closed door; or,
- using inappropriate sexualised, intimidating or offensive language.

If the concern has been raised via a third party, the principal should collect as much evidence as possible by speaking:

- directly to the person who raised the concern, unless it has been raised anonymously;
- to the individual involved and any witnesses.

Reports about supply staff and contractors should be notified to their employers, so any potential patterns of inappropriate behaviour can be identified.

Staff should be encouraged and feel confident to self-refer, where, for example, they have found themselves in a situation which could be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards.

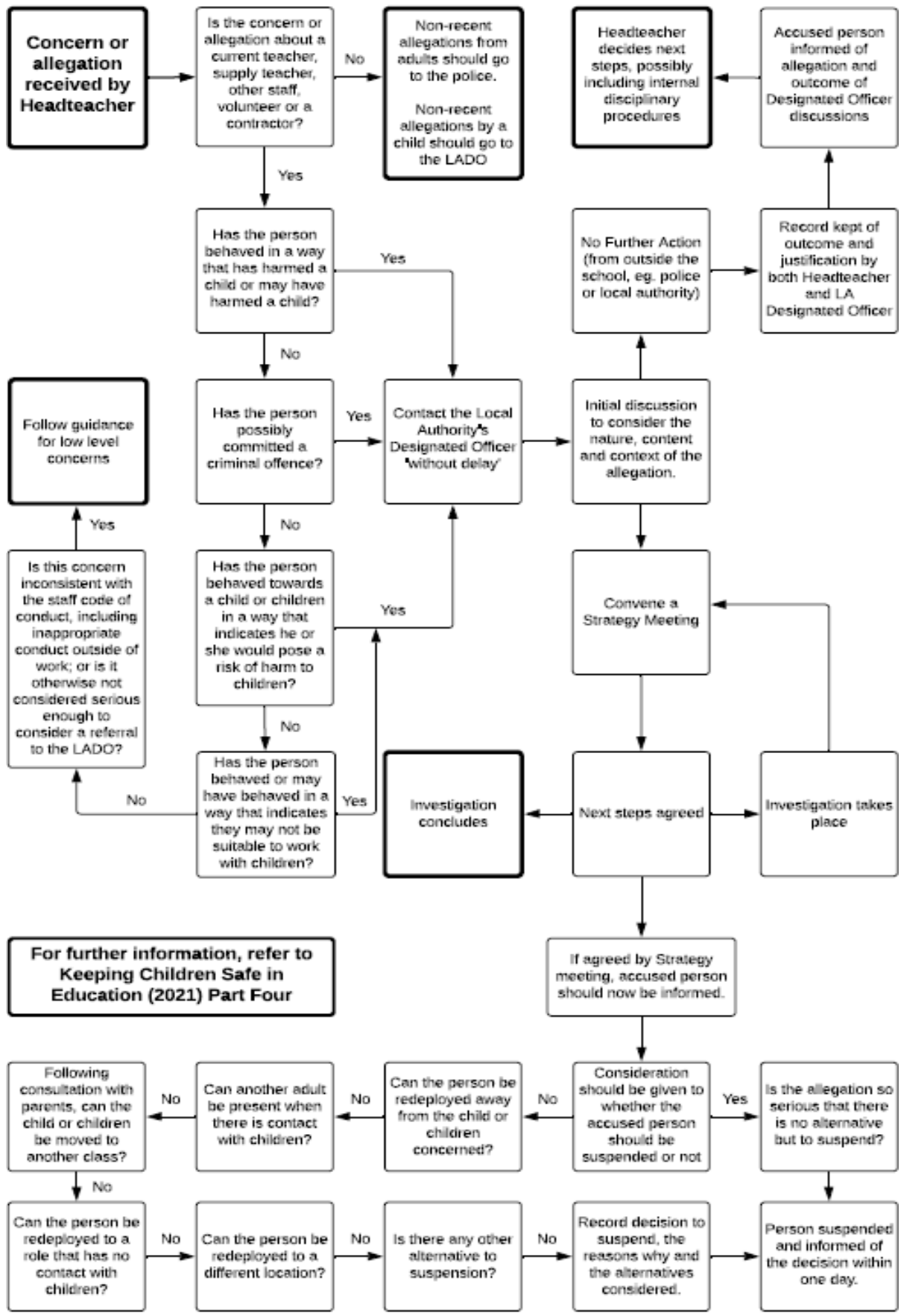
Low-level concerns should be recorded in writing, including:

- name* of individual sharing their concerns
- details of the concern
- context in which the concern arose
- action taken

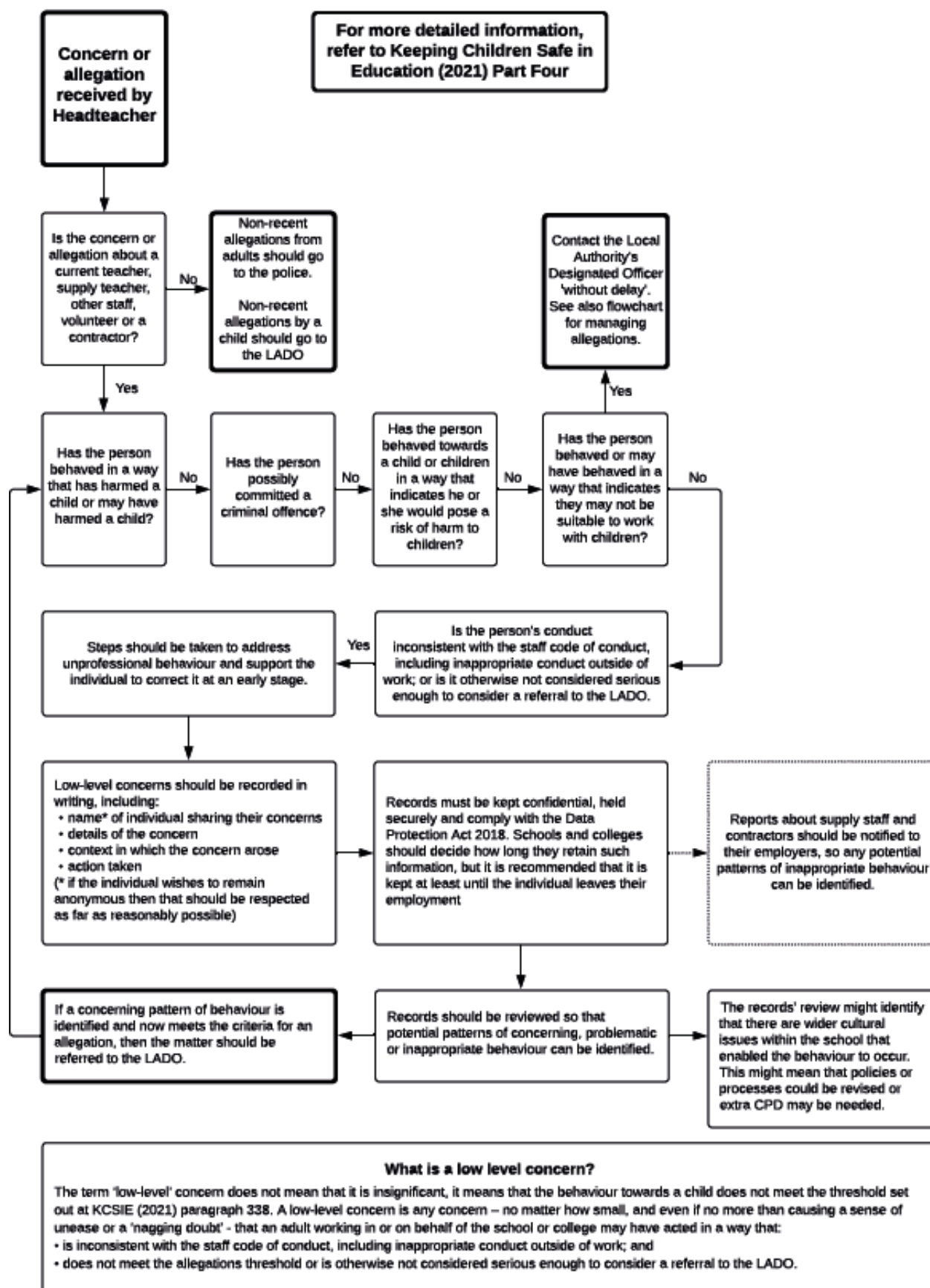
(* if the individual wishes to remain anonymous then that should be respected as far as reasonably possible)

Records must be kept confidential, held securely and comply with the Data Protection Act 2018. The records' review might identify that there are wider cultural issues within the school or college that enabled the behaviour to occur. This might mean that policies or processes could be revised, or extra training delivered to minimise the risk of it happening again.

Allegations made against/Concerns raised in relation to teachers, including supply teachers, other staff, volunteers



Managing low level concerns raised in relation to teachers, including supply teachers, other staff, volunteers and contractors



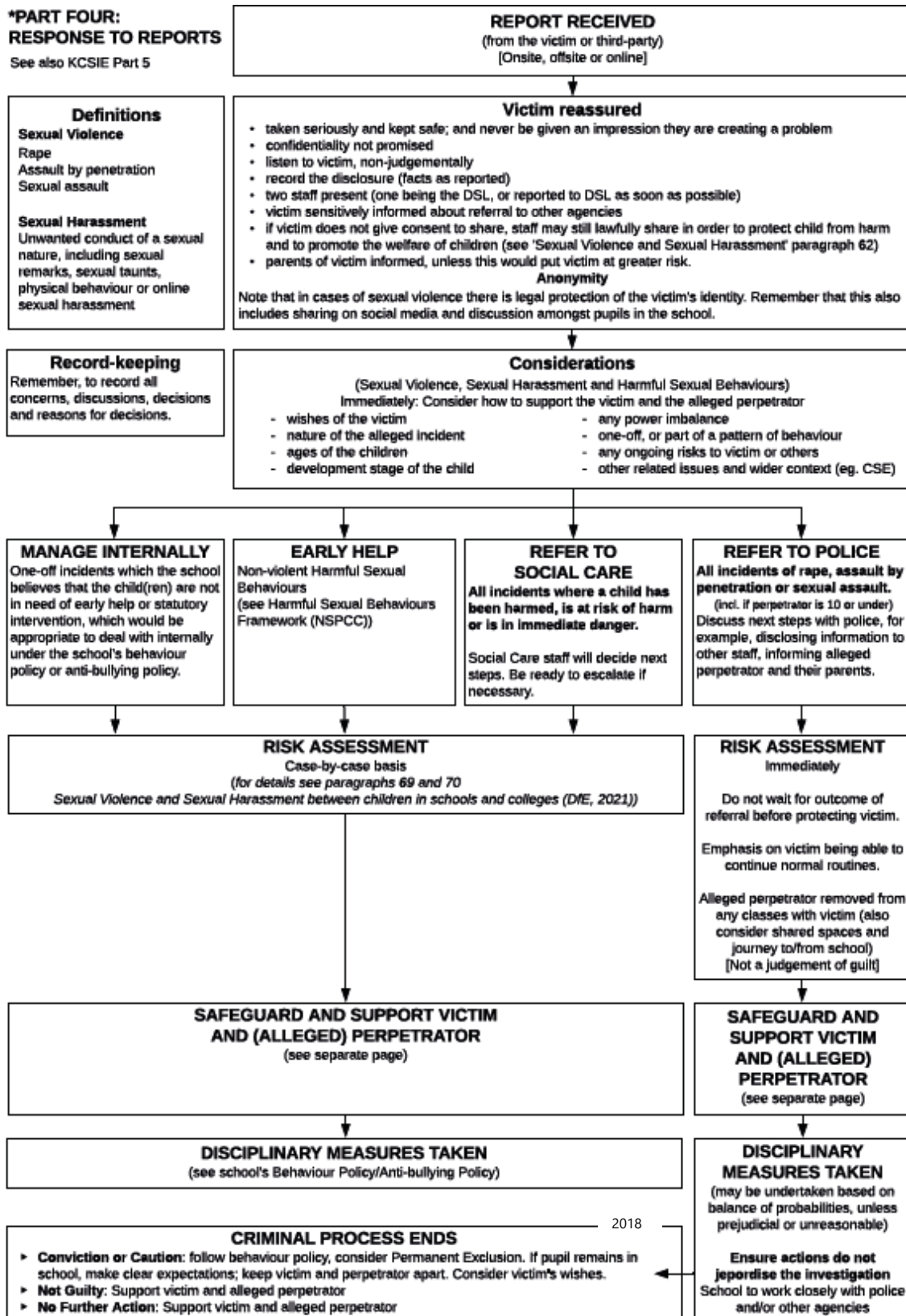
H) SEXUAL VIOLENCE AND SEXUAL HARASSMENT

Definitions

Victim	although not everyone affected by sexual violence or harassment considers themselves in this way, the guidance refers to this person as the victim throughout
Alleged Perpetrator	refers to the young person(s) responsible for the violence or harassment; the alleged child perpetrator must also be considered as someone in need of support and may be a victim of abuse themselves.
Sexual Violence	<p>Offences defined below under the Sexual Offences Act 2003 (<i>paraphrased for brevity</i>):</p> <p>Rape: intentional penetration of the vagina, anus or mouth of another person, using the penis, without consent</p> <p>Assault by penetration: intentional penetration of the vagina or anus of another person using a body part (other than the penis), or other object, without consent</p> <p>Sexual assault: intentionally touching another person sexually, without consent</p>
Sexual Harassment	is unwanted conduct of a sexual nature, including sexual comments, 'jokes' or taunts; physical behaviour; or online sexual harassment.
Consent	to agree to vaginal, anal or oral penetration with free will and the capacity to do so; consent is not all encompassing, may cover only certain sexual activities, may be given with conditions, may be withdrawn at any time; and consent is needed every time sexual activity takes place.
Harmful Sexual Behaviours	Children's sexual behaviours exist on a wide continuum across different ages and stages of development. However, abusive and violent sexual behaviours are inappropriate. Harmful sexual behaviours are often found in children who have been, or are being, abused themselves. Children showing signs of harmful sexual behaviours are in need of appropriate support themselves.

***PART FOUR:
RESPONSE TO REPORTS**

See also KCSIE Part 5



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Source:

*Sexual Violence and Sexual Harassment between children in schools and colleges (DfE, 2021)

SVSH Flow Chart for Schools 2021 v.1.0

Victim	Alleged Perpetrator	Other children
<ul style="list-style-type: none"> • needs and wishes of victim are paramount • not made to feel they are the problem • consider proportionality of response • aim for victim to carry out normal routine • recognise that they may struggle in class and may need time out (if they wish) • be aware that they may not disclose the whole picture immediately • prepare for support over a long period and consider who is involved (internal and external) • if victim moves College, the Designated Safeguarding Lead (DSL) informs the new College of the need for continued support 	<ul style="list-style-type: none"> • possible tension between discipline and support (these are not mutually exclusive) • consider age/developmental stage/any SEND • proportionate response • consider unmet needs (for example, harmful sexual behaviours (HBV)) • if (alleged) perpetrator moves College, the Designated Safeguarding Lead (DSL) informs the new College of the issues and transfers the child protection file 	<ul style="list-style-type: none"> • witnesses may need support (especially in cases of sexual violence) • avoid allowing pupils to 'take sides' • minimise potential for bullying or victimisation in College and on College transport where applicable • be aware of any social media use and inappropriate or even illegal posts (especially in cases of criminal investigation where anonymity is legally guaranteed) • develop safeguarding culture • constantly review reporting procedures and responses • consider potential for systematic and environmental weaknesses

Further Links

Sexual Violence and Sexual Harassment between children in schools and colleges (DfE, September 2021) www.safeguardinghandbook.co.uk/svsh

Harmful Sexual Behaviour Framework (NSPCC) www.safeguardinghandbook.co.uk/hsbf

Sexual Behaviours Traffic Light Tool (Brook) (identifying typical and atypical sexual behaviours) www.safeguardinghandbook.co.uk/brook

Preventing bullying (DfE) <http://www.safeguardinghandbook.co.uk/bullying>

Procedure for Reporting Safeguarding Concerns.

Concern, disclosure or suspicion of abuse.

This may be physical, emotional, sexual abuse or neglect, financial, fabricated/ induced illness, forced marriage, domestic abuse, honour-based violence, radicalisation or you just have a sense that something isn't quite right.

ANYONE CAN MAKE A REFERRAL

Staff suspect abuse

Learner discloses
abuse to staff

Someone else reports
abuse to staff e.g. friend.



Staff member informs the Safeguarding Team of their concerns
It is the staff members duty of care to report this.

CONFIDENTIALITY CANNOT BE OFFERED TO THE LEARNER



Staff member to
complete a Safeguarding
Alert.



Safeguarding team to speak to the
learner and offer relevant

**STAFF MUST CALL SAFEGUARDING
NUMBERS IF THE STUDENT IS
CONSIDERED TO BE AT IMMEDIATE
RISK OF HARM**

**EXT 3321, 3332, 3334. MOBILE:
07774109891, 07889353134**

FOR NON-URGENT CONCERNS PLEASE
SEND AN EMAIL TO
SAFEGUARDING@BURNLEY.AC.UK.
FOR OUTSIDE OF COLLEGE HOURS
PLEASE CONTACT LANCASHIRE SOCIAL
SERVICES ON 0300 123 6722.

Safeguarding team contacts relevant
agencies and communicates with the
learner

Safeguarding reports
outcome/decision to staff where
appropriate and update the
Safeguarding Alert.

Procedure for Referral by Safeguarding to the Local Authority

SAFEGUARDING CONSIDERS:

- Current concern/event and any historical information
- Possible explanations and contemporaneous events
- The need to seek further, external information/advice

Early Help

Discuss with the safeguarding team

Discuss with parents

Obtain consent

Agree ongoing in college support

Follow the continuum of need and early help guidance.

Possible channel referral

Record

Referral to Children's Social Care Section 17/Section 47.

Where it becomes clear that a referral to Children's Social Care is needed this should be reported without delay to the correct relevant authority.

Lancashire: 03001236720

Blackburn: 01254666400.

Out of hours:

Lancashire:

03001236722

Blackburn:

01254587547

Inform parents when appropriate. For Section 17 gain consent from parents. Safeguarding team to record responses/ seek responses from children social care.

Vulnerable Adult Concern

Once it has been established that a vulnerable adult is at risk the matter should be referred to the relevant authority's Adult Social Care.

Lancashire:

03001236721

Blackburn:

01254585949.

Notify the police if an adult is in immediate danger or a crime has been committed.

Safeguarding team to record responses/ seek responses when needed.

PROCEDURE FOR CHILDREN LOOKED AFTER

