Safeguarding & PREVENT Policy 2023-24

Policy Details	
Policy Owner	Head of Student Services & Designated Safeguarding Lead (DSL)
Date produced	September 2023
Approved by	SMT, Policies & Procedures Committee, Corporation Board, Quality Committee
Date approved	15 January 2023 (update)
To be reviewed	Annually
Publication	4Policies, Website
Version	4

1. Introduction and Purpose

1.1 Our Vision

1.1.1 At USP College, we are on a mission to connect young people to great career pathways, through exciting work and learning opportunities.

1.1.2 As a college, our strategy is Career Focused Learning, ensuring that the learner experience and our relationship within our community, local and regional employers, are at the heart of everything we do.

1.1.3 Our goal is to transform the lives of our learners and support them on their educational journey either to higher education or into the workplace.

1.2 Our Values

a. Respect
b. Accountability
c. Resilience.

1.2.1 Our values are embedded within every part of our college, from the way we plan our lessons to the way in which we expect students to behave.

1.2.2 As a college, we promote open discussion around these three key areas so individuals can find what these mean to them and to demonstrate these within their everyday lives.

1.2.3 By demonstrating these Values & Behaviours we aim to create a productive working environment for our staff and a positive learning environment for our students, who are at the heart of the college.

2. Statement of Intent

2.1. This policy applies to all staff, Governors and volunteers working for USP College and everyone else working for or on behalf of the college including contractors. This policy must be followed and promoted by all staff.

2.2. The college recognises that the welfare of young people and vulnerable adults is paramount. The Children Act 2004 states, any individual under the age of 18 years, without exception, has the right to protection from abuse regardless of gender, ethnicity, disability, age, sexuality or beliefs. This right to protection extends to the siblings of students that are under 18 years of age. .

2.3. It also extends to vulnerable adults defined as a person aged 18 years or over "Who is or may be in need of community care services by reason of disability, age or illness; and is or may be unable to take care or unable to protect him or herself against significant harm or exploitation" and includes 16-24year olds with an Education, Health & Care Plan (EHCP).

2.4. For those that are over 18 but not considered to be vulnerable the college still has a duty of care and will provide support, guidance and advice to those individuals.

2.5. Keeping Children Safe in Education (KCSIE) 2023 provides key information on safeguarding young people and promoting the welfare of all young people in education. This policy and associated procedures have been developed in line with the Local Safeguarding Children Partnership Guidelines, Working Together to Safeguard Children (WTTSC) 2018 and KCSIE 2023.

2.6. Key changes to KCSIE 2023

i. **Part one (and Annex A) of KCSIE - Safeguarding information for all staff**
- Staff are aware of the DSL's new roles and responsibilities.
- Staff have read and understood the Department for Education (DfE) 'Behaviour in schools' guidance

ii. **Part two - The management of safeguarding**
- Increased emphasis on governors responsibility to ensure filtering and monitoring systems are effective.
- DSL holds responsibility for filtering and monitoring systems.
- Increased emphasis for SEND students on recognising child on child abuse.
- Higher level of clarification has been given around children being absent and children missing education.
- Keeping children safe in out-of-school settings has been reinforced in the guidance.

iii. **Part three - Safer recruitment**
- All shortlisted candidates will have online searches done as part of their recruitment process.
- Ongoing vigilance has been recommended, in relation to staff online presence.

iv. **Part four - Allegations and safeguarding concerns about staff**
- Safeguarding Network will be introducing membership and audit support in this area over the summer.

v. **Part five - Child on child sexual violence and sexual harassment**
- KCSIE 2023 has been reworded to align with and reflect the changes in the DfE's Behaviour in schools' guidance.

vi. **Other annexes**
- Clarification around required consent to receive support through the Channel Programme has been outlined.
- The forced marriage section has been updated to reflect the legal age of marriage rising to 18 years old. This will be reflected in Safeguarding Training.

2.7. All current staff have received Part One of this publication as a summary document and have undergone safeguarding training. All new members of staff receive the same training as part of their induction. Staff must complete a mandatory online assessment to measure their understanding. The college may choose to provide staff not working directly with children or may have literacy difficulties, to provide them with a condensed version of Part 1. This and other requirements of mandatory safeguarding training are continuously under review and revised at least annually. All staff are subject to annual

renewal of Safeguarding and PREVENT training this is considered mandatory to be completed within communicated deadlines.

2.8. The college is committed to promoting and safeguarding the welfare of young people and staff and ensures it is a priority across all aspects of college. The college is committed to providing the best and safest learning environment possible to ensure learners can succeed and both young people and staff feel secure.

2.9. The college will:

i. Endeavour to identify young people who are experiencing significant harm and provide support and take appropriate action where necessary.
ii. Provide procedures for reporting such concerns and work in partnership with the appropriate agencies.
iii. Acknowledge that the term 'safeguarding' embraces both child protection and a preventative approach to keeping young people safe. This encompasses abuse, health and safety, bullying, honour-based abuse, meeting the needs of those with a disabling condition and/or medical condition, providing first aid and security. Appendix B provides descriptions of some of the main types of abuse.
iv. Create a safe environment for young people to learn and staff to work.
v. Provide emotional safety in classrooms, e.g., obtain parental permission for 18 certificate films to be viewed where appropriate.
vi. Ensure that students are taught about safeguarding via Induction and tutorial so they can recognise when they are at risk and know how to get help.
vii. Ensure visiting speakers are vetted prior to attendance and chaperoned at all times.
viii. Ensure safeguarding measures including risk assessments are taken for all trips and visits.
ix. Take measures to prevent unsuitable people from working with young people.
x. Allow for reporting and dealing with allegations of abuse against members of staff.
xi. Work closely with relevant local safeguarding partners and specifically the Local Authority Designated Officer (LADO) to ensure that the student is protected from harm.
xii. Take into consideration wider environmental factors through contextual safeguarding.
xiii. Monitor the effectiveness and implementation of this policy.
xiv. Ensure this policy and accompanying procedures and guidance are regularly reviewed for compliance.

3. Relevant Legislation

3.1 The College recognises its duties under relevant legislation and guidance as follows:

3.2 Legislation
i. Children Act 1989
ii. Education Act 2002
iii. Safeguarding Vulnerable Groups Act 2006
iv. Children and Social Work Act 2017
v. The Children's Act 2004
vi. Children and Families Act 2014
vii. Prevent Duty 2015
viii. Human Rights Act 1998
ix. Data Protection Act 1998 and GDPR 2018

3.3 Guidance
i.   Keeping Children Safe in Education 2023
ii. Working Together to Safeguard Children 2018 (updated 2020)
iii. Information Sharing: Advice for practitioners providing safeguarding services to children, young people, parents and carers 2018
iv. SET Safeguarding and Child Protection Procedures 2019
v.   Prevent Duty in Further Education 2019
vii. Guidance for safer working practice for those working with children and young people in education settings 2019
viii. SEND Code of Practice: 0 to 25 years

4. Linked Policies

i.   Mental Health, Wellbeing and Fitness to Study Policy
ii.   Student Disciplinary Policy
iii. Student Anti-Bullying and Harassment Policy
iv.   Equality, Diversity and Inclusion Policy
v.   Health & Safety Policy
vi.   Lockdown Procedure
vii. Data Protection Policy
viii. Acceptable Use & Online Safety Policy
ix.   Bullying and Harassment Policy (Staff) x.
      Safer Recruitment and Selection Policy
xi.   Staff Code of Conduct

5. Implementation and Responsibilities

5.1   The college will take action to:

i. Appoint and train a Designated Safeguarding Lead and deputies who will coordinate reporting procedures.

Designated Safeguarding Lead: Head of Student Services

Seevic Campus
Deputy Designated Safeguarding Person: Safeguarding & Wellbeing Coordinator Deputy: College Wellbeing Adviser to deputise in their absence.

Palmer's Campus
Deputy Designated Safeguarding Lead, Student Services Manager
College Wellbeing Advisor to deputise in their absence.

Xtend Campus
Designated Safeguarding Lead, Deputy safeguarding Leads, Supported Employment Manager in their absence, will liaise with Safeguarding lead or deputies.

ii. The college has a designated Governor with Safeguarding responsibilities

6. Safeguarding roles and responsibilities

6.1 All staff

USP implements a whole college approach to Safeguarding and promoting the welfare of children which is everyone's responsibility. This means that all staff are responsible for ensuring that they are familiar with and understand the colleges Safeguarding & PREVENT Policy and procedures. All concerns should be raised promptly to the Safeguarding team. It is important that any communication is recorded in writing.

6.2 Designated Safeguarding Lead

The DSL has key responsibility for raising awareness to staff about concerns relating to the welfare of children and young people. The DSL also leads on the promotion of a safe environment for the children and young people attending the College. The DSL also takes lead responsibility for Safeguarding and Online Safety which includes, overseeing the filtering and monitoring reports, maintaining the filtering and monitoring systems and actioning on any safeguarding concerns. The DSL works closely with the Head of IT to maintain the filtering and monitoring systems, due to their specialist knowledge. The responsibilities of the DSL are detailed in Keeping Children Safe in Education 2023.

6.3 Deputy Safeguarding Leads

The Deputy Designated Safeguarding Leads act as first point of contact for students, staff and visitors to raise concerns. The Deputy Designated Safeguarding Leads are members of the Wellbeing and Student Services. They are supported by a wider team of Safeguarding representatives across the College.

The DSL and DDSL's work closely with the LADO as part of the Working Together to Safeguard Children arrangements. The College is supported by the LADO and Children and Families Services at Essex County Council and Thurrock.

6.4 Safeguarding Team

The wider Safeguarding Team have received Safeguarding training and assist Deputy DSL's and DSL with safeguarding related matters of concern.

6.5 Student Services

All staff within the Student Services team hold responsibilities for the welfare of students. The team will contribute to the maintenance and development of the college's Safeguarding Policy. They can also offer advice to staff and students where appropriate.

6.6 Governors

Governors must ensure that filtering and monitoring systems are effective and maintained.

6.7 The college will:

6.7.1 Make available to all staff and students, the names and roles of the Safeguarding Team and the Safeguarding procedures.

6.7.2 Train all staff in recognising signs of abuse and responding appropriately including referral procedures. This will be updated every year. All new staff to receive this in induction and undertake refreshers where appropriate.

6.7.3 Train staff in safe practices to safeguard young people in the learning environment and also to protect themselves from false allegations of abuse.

6.7.4 Keep accurate records of concerns about individuals, even when there is no immediate referral to outside agencies.

6.7.5 Provide support and monitoring of young people thought to be at risk of harm and contribute to support plans with other agencies.

6.7.6 Provide support through Student Services and tutorials to help young people keep safe.

6.8 Human Resources will ensure:

6.8.1 All staff are aware of the Whistleblowing Policy and Procedures.

6.8.2 Safer recruitment practices by adherence to the college's Safer Recruitment & Selection Policy and the Protection of Children Act 2004.

6.8.3 All Interviews will include a person who has undertaken Safeguarding and Safer Recruitment training.

6.8.4 All shortlisted candidates must be made aware that online searches may be done as part of their recruitment process.

6.8.5 As part of the safer recruitment process all new staff to have either received their Disclosure and Barring Service, (DBS) Disclosure or have applied for one, by commencement of employment. For those staff not in possession of a current disclosure on commencement, a risk assessment will be carried out authorised by a member of the Senior Management Team, and a DBS declaration from will be completed. All those offered employment will be checked against the Children's Barred List.

6.8.6 Induction training for all staff now needs to ensure an understanding of expectations, roles and responsibilities around the colleges filtering and monitoring system.

6.8.7 The DBS disclosure number and date will be logged on the single central record.

6.8.8 All existing staff to be DBS re-checked on a rolling five-year programme and a DBS re- declaration will be completed annually.

6.8.9 This policy is reviewed annually by the Designated Safeguarding Lead in consultation with HR. It will also be endorsed by Governors.

6.8.10 Safeguarding concerns, all complaints, allegations and suspicions are taken seriously and discussed by the Designated Safeguarding Lead and the Principal & CEO informed before any steps are taken. Concerns and complaints against the Principal & CEO should be raised directly to the Chair of Governors for the attention of the Corporation.

6.8.11 Staff allegations (including agency staff) will be dealt with appropriately and reported to the necessary professional external agencies as required by current and relevant legislation

6.8.12 All Staff should read the following:
   i.   Keeping Children Safe in Education 2023 Part 1
   ii.   Staff Code of Conduct
   iii. Safeguarding and PREVENT Policy
   iv.   DfE 'Behaviour in Schools' Guidance
   v.   Children Missing in Education (See Safeguarding & Prevent Policy – Appendix B)

6.8 Safeguarding issues

We are committed to ensuring that all staff have an awareness of safeguarding issues that can put children at risk of harm. We recognise that behaviours linked to issues such as drug taking and or alcohol misuse, deliberately missing education and consensual and non-consensual sharing of nude and semi-nude images and/or videos can be signs that children are at risk. A detailed section on safeguarding issues that staff need to be aware of is listed in Appendix B.

7. PREVENT

7.1 Statement of Intent

7.1.1   USP College recognises the positive contribution it can make towards protecting its students from radicalisation and/ or violent extremism. The college will continue to:

a.   Empower its students to create communities that are resilient to extremism.

b.   Protect the wellbeing of particular students who may be vulnerable to being drawn into violent extremism or crime.

c.   Continue to promote the development of spaces for free debate where shared values can be reinforced.

d.   Promote values of openness and tolerance which is characteristic of British values (British values is defined as **_"democracy, the rule of law, individual liberty and mutual respect and tolerance for those with different faiths and beliefs"_**).

7.1.2   Radicalisation is tackled using the Safeguarding and PREVENT Policy and procedures in the College. Radicalisation is the process by which individuals come to support terrorism or violent extremism.

7.2   Background

7.2.1   Section 21 of the Counter-Terrorism and Security Act 2015 (the Act) places a duty on certain bodies, including schools and colleges, listed in Schedule 3 of the Act, to have 'due regard to the need to PREVENT people from being drawn into terrorism'.

7.2.2   The college's policy is formed from the National Strategy known as Counter Terrorism Strategy (CONTEST). It has four elements:

a.   Pursue
b.   Protect
c.   Prepare
d.   PREVENT

7.2.3   The area in which colleges have the most influence is 'PREVENT' which aims to stop people becoming terrorists or supporting terrorism.

7.3   Aim

7.3.1   The aim of PREVENT contributes to maintaining a safe, healthy and supportive learning and working environment for our learners, staff and visitors alike. We recognise that extremism and exposure to extremist materials and influences can lead to poor outcomes for learners. We further recognise that if we fail to challenge extremist views, we are failing to protect our learners from potential harm. As such, the PREVENT agenda, will be addressed as a safeguarding concern and dealt with in accordance with guidance from the National Office of Counter-Terrorism.

7.3.2   PREVENT happens before any criminal activity takes place by recognising, supporting and protecting people who might be susceptible to radicalisation. It should be noted that an individual needs to consent to any support offered by the Channel Programme.

7.3.3 The national PREVENT Duty confers mandatory duties and responsibilities on a range of public organisations, including Further Education Colleges, and seeks to:

  a. Respond to the ideological challenge of terrorism and aspects of extremism, and the threat we face from those who promote these views.

  b. Provide practical help to PREVENT people from being drawn into terrorism and violent extremism and ensure they are given appropriate advice and support.

  c. Work with a wide range of sectors where there are risks of radicalisation which needs to be addressed, including education, criminal justice, faith, the internet and health.

7.4 Context

7.4.1 PREVENT sits within the realm of Safeguarding & PREVENT at the college. All staff are trained and regularly updated on the Safeguarding Policy and associated professional practices and expectations.

7.4.2 PREVENT is also integral to other areas within the college including:

  a. Equality and Diversity and Inclusion
  b. Health and Safety

7.4.3 Issues related to radicalisation are included in safeguarding reports to Corporation.

7.5 Definitions

7.5.1 The following are commonly agreed definitions within the PREVENT duty:

  a. An ideology is a set of beliefs;
  b. Radicalisation is the process by which a person comes to support terrorism and forms of extremism that may lead to terrorism.
  c. Safeguarding is the process of protecting vulnerable people, whether from crime, other forms of abuse or from being drawn into terrorism related activity.
  d. Terrorism is an action that endangers or causes serious violence, damage or disruption and is intended to influence the government or to intimidate the public and is made with the intention of advancing a political, religious or ideological agenda.
  e. Vulnerability describes factors and characteristics associated with being susceptible to radicalisation.
  f. Extremism is vocal or active opposition to fundamental British Values, including democracy, the rule of law, individual and mutual respect and tolerance of different faiths and beliefs.

7.6 Who Does This Policy Apply To?

7.6.1 The PREVENT agenda applies to everyone working at or attending the College. It places responsibilities on all governors; College staff; learners; agency staff

and volunteers; contractors; visitors; consultants; and those working under self-employed arrangements.

7.7 Staff Responsibilities

7.7.1 Compliance with the Counter-Terrorism and Security Act 2015 will require the college to demonstrate that it undertakes appropriate training and development for Governors, managers and staff. All staff receive awareness training on an on-going basis ensuring that they are up to date with PREVENT matters.

7.7.2 As part of the staff induction process, all staff will read and complete an assessment to ensure understanding of 'Keeping Children Safe in Education'.

7.7.3 There is no typical profile for a person likely to become involved in extremism, or when they move to adopt violence in support of their particular ideology. Staff should use their professional judgment to identify significant changes in behaviour which may be indicators of radicalisation.

7.7.4 If staff have any significant concerns about a student, staff member or visitor beginning to support terrorism and/or violent extremism, they should notify the Designated Safeguarding Lead or a member of the Safeguarding Team who will make an external referral if necessary.

7.8 Governing Body

7.8.1 All Board members have a legal responsibility under the PREVENT duty to make sure they have undertaken relevant training.

7.8.2 The Board must also ensure:

a. All college staff have undertaken training in PREVENT duty.
b. All college staff are aware of when it is appropriate to refer concerns about learners or colleagues to the Designated Safeguarding Lead or member of the Safeguarding Team.
c. All college staff exemplify British Values.

7.8.3 Policies and procedures to implement the PREVENT duty are in place and acted upon where appropriate.

7.9 Students

7.9.1 Students receive awareness training as part of their induction processes. This is further enforced through tutorial activities including exploration of the British Values topics. Curriculum teams will identify opportunities within their programme of study to highlight British Values.

7.10 Partnerships

7.10.1 The college maintains well-established partnerships, including a partnership with the Counter Terrorism Unit, to receive regular updates to keep staff and students safe and well informed.

7.10.2 The college maintains partnerships with the Police through the Essex, Thurrock and Southend PREVENT leads to ensure high quality training and support, and works closely with the PREVENT regional coordinator.

7.10.3   The college is represented at the Local Safeguarding Children's Board (LSCB) and liaises with the relevant Multi Agency Safeguarding Hubs (MASH) to ensure intelligence is shared and acted upon as necessary.

8.   Work Experience and Industry Placement

8.1   Employers offering Work Experience are required to complete and provide all necessary paperwork required by USP College including Risk Assessment and Health and Safety documents. Full details about the arrangements are available from the Work Experience and Careers Team.

8.2   Safeguarding records should be maintained and stored in accordance with GDPR/DP and best safeguarding practice.

8.3   Use of a new database called Grofar streamlines and links communication to employers and students to the safeguarding and prevent link on the MyUSP app.

8.4   Visitors to campus, contractors and consultants

8.4.1   On arrival visitors are required to sign-in at Reception, provided with visitor ID badge and are collected by the person they are visiting.

8.4.2   For Visiting Speaker and Guest Lecturers, the College undertakes a risk assessment prior to the VS/GL being authorised to deliver a talk at USP.

8.4.3   Contractors and non-employees undertaking work on the USP campus must comply with the College's Health and Safety and safeguarding requirements

8.4.4   Organisations wishing to hire the College facilities are informed of their safeguarding responsibilities by the Head of Estates.

9.   Providing a safe environment

9.1   All students, staff and visitors are required to wear an ID badge and lanyard.

9.2   The College also utilises Sophos software to monitor student activity online and manage potential risks.

9.3   As part of the Tutorial Programme, students attend a range of tutorials including online safety. Students also have access to useful information and resources via the VLE.

9.4   The College is protected by CCTV and Duty Managers are vigilant and conduct regular campus safety walks.

9.5   Supporting students' wellbeing:

9.5.1   The Wellbeing teams and counsellors support students.   Students are able to drop in for support or can contact the team through the following ways:
    a.   Seevic Campus – wellbeingseevic@uspcollege.ac.uk
    b.   Palmer's Campus – wellbeingpalmers@uspcollege.ac.uk
    c.   Safeguarding Emergency Designated Line - 01268 882 665.
    d.   The MyUSP App Safeguarding & Wellbeing Dashboard

9.5.2   In addition our counsellors   can offer online meetings with students in accordance with the British Association for Counselling and Psychotherapy (BACP) Guidelines.

9.5.3   The safeguarding team are available between 8.30am and 4.30pm during term time.

9.5.4   Links to some alternative a resources should students require support out of hours include:
   a.   Kooth – chat online to friendly counsellors, read articles written by young people and receive anonymous online support
   b.   Samaritans – often through the phone they can provide emotional support
   c.   Mind – a mental health charity who can provide information and advice
   d.   SANEline – out of hours mental health helpline
   e.   Students Minds – student mental health charity
   f.   Every Mind Matters – they offer simple and practical advice to help you stay mentally healthy
   g.   NHS – they have dedicated resources available to help deal with stress, anxiety or depression
   h.   **Additional contacts and support materials can be found on the MyUSP app Safeguarding & Wellbeing Dashboard.**

9.5.5   If students need urgent wellbeing help they can contact:

   a.   Samaritans - Tel: 116 123 who are available any time and any day
   b.   Mind - Tel: 0300 123 3393S
   c.   SANEline - Tel: 0300 304 7000 (4.30pm-10.30pm)
   d.   Your local GP for medical advice by making an emergency appointment
   e.   NHS (England & Wales) Tel: 111 999 or go to Accident and Emergency (A&E) for immediate help.

9.6   Safeguarding Record-Keeping

9.6.1   Safeguarding records are created and maintained electronically in a confidential area on ProMonitor. These records are stored electronically and access is restricted to the Safeguarding Team. Safeguarding and wellbeing cases are recorded and categorised on Promonitor as appropriate.

9.6.2   Safeguarding records received from a previous school are stored in a lockable cabinet and recorded under confidential comments on Promonitor.

9.7   Confidentiality

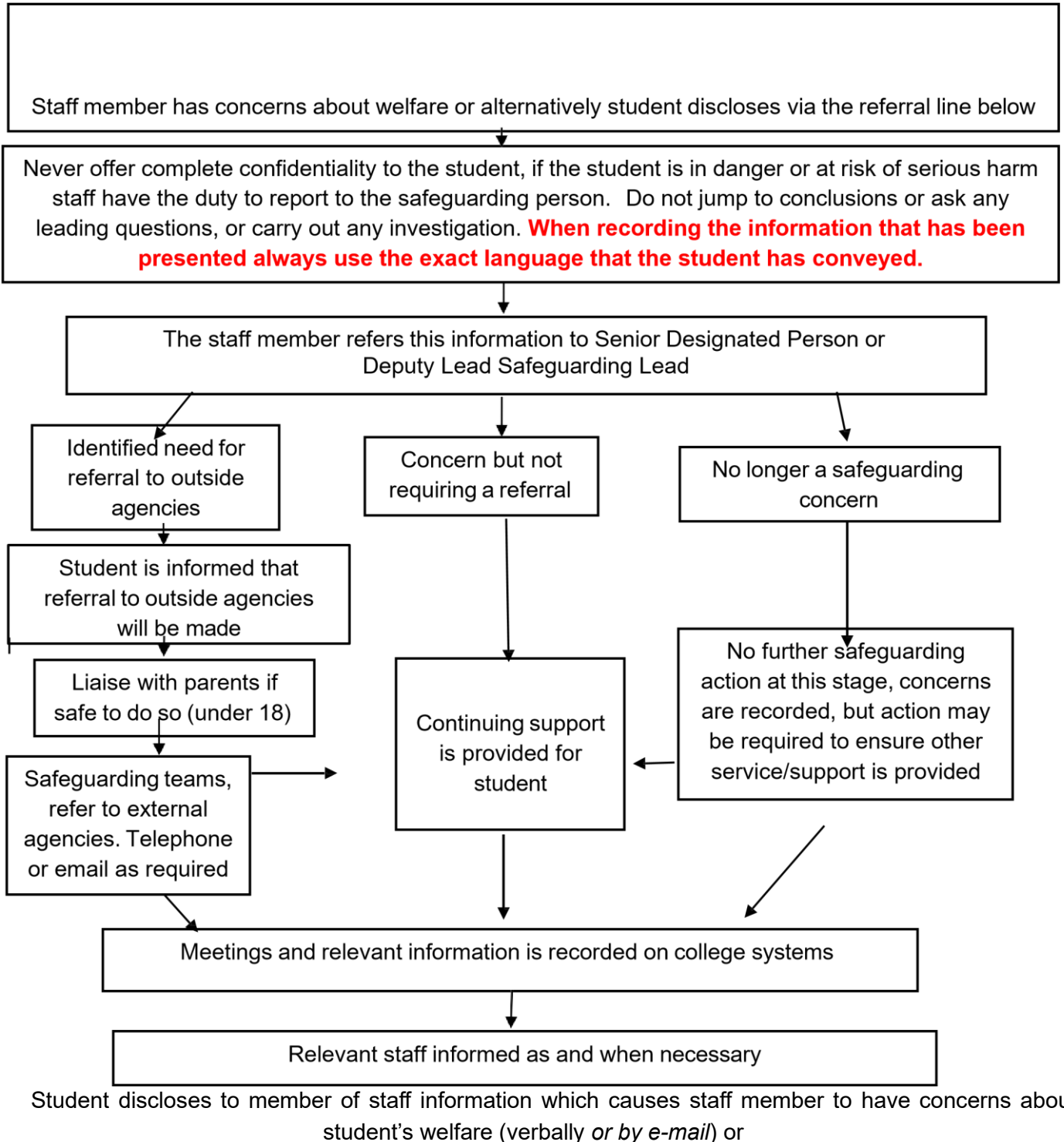9.7.1 Confidential comments regarding safeguarding, wellbeing or counselling are recorded on Promonitor by category and reason allowing for accurate reporting. These records are only accessible to college counsellors and the core safeguarding team.

9.7.2 Transfer of files and information to external partners is encrypted. Confidential information received from external partners is password protected.

Appendix A

Safeguarding Referral Procedure
(This applies to all college students regardless of age)

Staff have been informed that they must refer students who disclose any information relating to safeguarding to the Designated Safeguarding Lead, or the Deputy Designated Leads at each campus.

Staff member has concerns about welfare or alternatively student discloses via the referral line below

Never offer complete confidentiality to the student, if the student is in danger or at risk of serious harm staff have the duty to report to the safeguarding person. Do not jump to conclusions or ask any leading questions, or carry out any investigation. **When recording the information that has been presented always use the exact language that the student has conveyed.**

The staff member refers this information to Senior Designated Person or Deputy Lead Safeguarding Lead

Identified need for referral to outside agencies

Concern but not requiring a referral

No longer a safeguarding concern

Student is informed that referral to outside agencies will be made

Liaise with parents if safe to do so (under 18)

Safeguarding teams, refer to external agencies. Telephone or email as required

Continuing support is provided for student

No further safeguarding action at this stage, concerns are recorded, but action may be required to ensure other service/support is provided

Meetings and relevant information is recorded on college systems

Relevant staff informed as and when necessary

Student discloses to member of staff information which causes staff member to have concerns about student's welfare (verbally *or by e-mail*) or

If an allegation is made against a member of staff, the HR team will be informed immediately. The Safeguarding Team will support HR if and when appropriate.
Dedicated Safeguarding Referral Line
Direct Dial 01268 882665
In the absence of both the Designated Senior Person and Deputy Designated Person, the following out of hours number should be called:
Social Care Essex: 0345 6061212/0345 6037627 Thurrock: 01375 652802/01375 372468 Southend: 01702 215007/0345 6061212

Appendix B

What college staff should look out for

Early help

Any child may benefit from early help, but all school and college staff should be particularly alert to the potential need for early help for a child who:

- is disabled and has specific additional needs;
- has special educational needs (whether or not they have a statutory Education, Health and
  Care Plan);
- is a young carer;
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups;
- is frequently missing/goes missing from care or from home;
- is at risk of modern slavery, trafficking or exploitation;
- is at risk of being radicalised or exploited;
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse;
- is misusing drugs or alcohol themselves; • has returned home to their family from care; and • is a privately fostered child.

The College recognises that students with special educational needs and disabilities can face additional safeguarding challenges. The safeguarding team work closely with the SEND team in this regard.

Abuse and neglect

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

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

Indicators of abuse and neglect

Abuse: a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children.

Physical abuse: a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also

be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

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

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

Sexual abuse: involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving 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 noncontact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue (also known Child on child abuse) in education and all staff should be aware of it and of their school or college's policy and procedures for dealing with it, (see paragraph 49).

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

Both CSE and CCE are forms of abuse that occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in sexual or criminal activity, in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. CSE and CCE can affect children, both male and female and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation.

Child Sexual Exploitation (CSE)

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

encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse including via the internet.

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

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

Child Criminal Exploitation (CCE)

Some specific forms of CCE can include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting or pickpocketing. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others.

Children can become trapped by this type of exploitation as perpetrators can threaten victims (and their families) with violence, or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others. As children involved in criminal exploitation often commit crimes themselves, their vulnerability as victims is not always recognised by adults and professionals, (particularly older children), and they are not treated as victims despite the harm they have experienced. They may still have been criminally exploited even if the activity appears to be something they have agreed or consented to.

It is important to note that the experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however professionals should be aware that girls are at risk of criminal exploitation too. It is also important to note that both boys and girls being criminally exploited may be at higher risk of sexual exploitation. Further information about CCE including definitions and indicators is included in Annex B.

Child on Child abuse

All staff should be aware that children can abuse other children. And that it can happen both inside and outside of college and online. It is important that all staff recognise the indicators and signs of Child on Child abuse and know how to identify it and respond to reports. Child on Child abuse is managed through the College Student Anti-Bullying and Harassment Policy.

All staff should understand, that even if there are no reports in their schools or colleges it does not mean it is not happening, it may be the case that it is just not being reported. As such it is important if staff have any concerns regarding Child on Child abuse they should speak to their designated safeguarding lead (or deputy).

It is essential that all staff understand the importance of challenging inappropriate behaviours between peers, many of which are listed below, that are actually abusive in nature. Downplaying certain behaviours, for example dismissing sexual harassment as "just banter", "just having a laugh", "part of growing up" or "boys being boys" can lead to a culture of unacceptable behaviours, an unsafe environment for children and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it.

Child on Child abuse is most likely to include, but may not be limited to:

- bullying (including online bullying, cyberbullying, prejudice-based and discriminatory bullying)

- abuse in intimate personal relationships between peers

- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)

- sexual violence, such as rape, assault by penetration and sexual assault; (this may include an online element which facilitates, threatens and/or encourages sexual violence)

- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse; causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party;

- consensual and non-consensual sharing of nudes and semi nude images and or videos (also known as sexting or youth produced sexual imagery);

- upskirting which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm; and

- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

All staff should be clear as to the school's or college's policy and procedures with regards to Child on Child abuse and the important role they have to play in preventing it and responding where they believe a child may be at risk from it.

All staff will receive training on Child on Child abuse as part of their initial safeguarding training during their induction period. This ensures that they have a clear understanding of how to identify cases of Child on Child abuse and any concerns will be reported to the DSL or deputy DSL and safeguarding referral procedures will be followed. The college needs to be mindful that in these cases support will need to be provided for all children involved. A number of factors will need to be taken into consideration, including the management of contact between victim and perpetrator, this may include remote learning until the situation is made safe.

All staff are aware of the increased potential for bullying or child on child abuse towards SEND students. Staff make reasonable adjustments for disabled children and young people to deal with particular disadvantages and signpost students to specialist SEND services.

The college has a zero tolerance approach to abuse and it will never be passed off as banter, having a laugh, part of growing up or boys being boys, as this can lead to a culture of unacceptable behaviours and an unsafe environment for our students.

Serious violence

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

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

and gang involvement and its Criminal exploitation of children and vulnerable adults: county lines guidance.

Departmental advice What to Do if You Are Worried a Child is Being Abused - Advice for Practitioners provides more information on understanding and identifying abuse and neglect. Examples of potential indicators of abuse and neglect are highlighted throughout the advice and will be particularly helpful for school and college staff. The NSPCC website also provides useful additional information on abuse and neglect and what to look out for

Female Genital Mutilation

Whilst **all** staff should speak to the designated safeguarding lead (or deputy) with regard to any concerns about female genital mutilation (FGM), there is a specific **legal duty on teachers**. If a teacher, in the course of their work in the profession, discovers that an act of FGM appears to have been carried out on a girl under the age of 18, the teacher **must** report this to the police.

Extra-Familial Harm

All staff should be aware that safeguarding incidents and/or behaviours can be associated with factors outside the college and/or can occur between children outside of these environments. All staff, but especially the DSL (and deputies) should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, and serious youth violence.

Forced marriage

Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some perpetrators use perceived cultural practices as a way to coerce a person into marriage. Schools and colleges can play an important role in safeguarding children from forced marriage. The Forced Marriage Unit (FMU) has created: Multi-agency practice guidelines: handling cases of forced marriage (pages 32-36 of which focus on the role of schools and colleges) and, Multi-agency statutory guidance for dealing with forced marriage, which can both be found at https://www.gov.uk/guidance/forced-marriage. School and college staff can contact the Forced Marriage Unit if they need advice or information: Contact: 020 7008 0151 or email fmu@fcdo.gov.uk.

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

Mental Health

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

Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Education staff, however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.

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

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

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

Missing in Education

Any students that are missing from education that are deemed vulnerable, this could include previous safeguarding issues or unexplained or unusual absence without contact with either the student or their family, will be reported to the police for a welfare check. In the case of students known to external services, the college will liaise with the appropriate agency. Students are required to provide an emergency contact. The distinction between children being absent and children missing in education has been clarified with the distinct DfE guidance documents 'Working to improve school attendance' and 'Children Missing in Education'.

The College has an Attendance Policy which underpins arrangements to ensure that students with poor attendance are monitored and appropriate support plans are in place.

Appendix C

<p align="center">**Safeguarding Contact List**</p>

The following are the current Safeguarding Team members:

Seevic Campus	Job Role	Contact Number
Andy Shepherd	Designated Safeguarding Lead & Head of Student Services	01268 756 111 Ext.272
Michelle Lagden	Deputy Safeguarding Lead & Safeguarding, Wellbeing and Mental Health Coordinator	01268 756 111 Ext.157
Craig Davidson	Assistant Principal Student Experience	01268 756 111
Helen Ansell	Wellbeing Advisor	01268 756111 Ext 158
Jermaine Simpson	Positive Behaviour Officer	01268 756111 Ext. 274
Lorraine Stoten	Director of Human Resources	01268 756111 Ext 182
TBC	Lead Governor for Safeguarding	Via Clerk to the Governor

Palmer's Campus	Job Role	Contact Number
Andy Shepherd	Designated Safeguarding Head of Student Services	01375 370121 Ext.272
Nickie Hillebrandt	Deputy Safeguarding Lead & Student Services Manager	01375 370121 Ext.549
Mandy Monksfield	Wellbeing Advisor	01375 370121 Ext. 616
Emma Roles	Positive Behaviour Officer	01375 370121 Ext. 588
Craig Davidson	Assistant Principal Student Experience	01268 756111
Lorraine Stoten	Director of Human Resources	01268 756111 Ext 182
TBC	Lead Governor for Safeguarding	Via Clerk to the Governor

XTEND Digital Campus	Job Role	Contact Number
Andy Shepherd	Designated Safeguarding Lead & Head of Student Services	01268 756 111 Ext.272
Michelle Lagden	Deputy Safeguarding Lead & Safeguarding, Wellbeing and Mental Health Coordinator	01268 756 111 Ext.157
Julie Clark	Supported Employment Manager	01268 756111 Ext 285

Nickie Hillebrandt	Deputy Safeguarding Lead & Student Services Manager	01375 370121 Ext.549
Craig Davidson	Assistant Principal Student Experience	01268 756111 Ext 271
Hannah Pascoe	HE Student Success Officer	01268 756111 Ext 103
Lorraine Stoten	Director of HR	01268 75611 Ext 182
TBC	Lead Governor for Safeguarding	Via Clerk to the Governor

Equality and Diversity Impact Assessment

USP College is committed to equality of opportunity. The aim is to create an environment in which people treat each other with mutual respect, regardless of: age, disability, family responsibility, marital status, race, colour, ethnicity, nationality, religion or belief, gender, gender identity, transgender, sexual orientation, trade union activity or unrelated criminal convictions.

This form should be used by managers and policy owners within their area of responsibility to carry out Equality and Diversity Impact Assessments (EDIAs) in relation to protected characteristics including, but not limited to: Age, Disability, Gender reassignment, Marriage and civil partnership, Pregnancy and maternity, Race, Religion and belief, Sex, Sexual orientation. The word 'policy' is taken to include strategies, policies, procedures and guidance notes; both formal and informal, internal and external.

1.   Name of Policy

Safeguarding & PREVENT Policy

2.   Which of the following groups could be affected by this policy?
(Tick all that apply)

Students	√
Staff	√
Wider Community	√

3.   Complaints

Have complaints been received from anyone with one or more protected characteristic about the service provided? If yes then please give details.

N/A

4.   The Impact

Four possible impacts should be considered as part of the assessment:

   a.   **Positive Impact -** Where the policy might have a positive impact on a particular protected characteristic.

  b. **None or Little Impact –** Where you think a policy does not disadvantage any of the protected characteristics

  c. **Some Impact –** Where a policy might disadvantage any of the protected characteristics groups to some extent. This disadvantage may be also differential in the sense that where the negative impact on one particular group of individuals with protected characteristic is likely to be greater than on another.

  d. **Substantial Impact –** Where you think that the policy could have a negative impact on any or all of the protected characteristics. This disadvantage may be also differential in the sense that the negative impact on one particular protected characteristic is likely to be greater than on another.

Thought-provoking questions, which might help come to a decision about the impact of a policy on individuals with protected characteristics:

  e. Does policy outcomes and service take up differ between people with different protected characteristics?

  f. What key information do we have? Does data or engagement with people with protected characteristics give insights into areas of disadvantage, which relate to the policy area?

  g. If the policy is likely to have a negative impact on individuals, sharing particular characteristics what steps can be taken to mitigate these effects?

  h. Will the policy deliver practical benefits for certain groups?

  i. Does the policy miss opportunities to advance equality of opportunity and foster good understanding/ relationships between groups?

  j. Do other policies need to change to make this policy more effective?

  k. Is there any elements of the policy that could be unlawful under the Equality Act 2010?

Use the guidance provided above and complete the following table: **(Please Tick √)**

Gender/Age	Positive Impact	No or Little Impact	Some Adverse Impact	Substantial Adverse Impact
Gender		√		
Age		√		
Disability	Positive Impact	No or Little Impact	Some Adverse Impact	Substantial Adverse Impact
Visually Impaired		√		
Hearing impaired		√		
Physical Disability		√		
Specific Learning Difficulties		√		
Global Learning Difficulties		√		
Autistic Spectrum Disorder		√		

Any other disability – Various		√		
Other Factors	Positive Impact	No or Little Impact	Some Adverse Impact	Substantial Adverse Impact
Race		√		
Culture		√		
Religious Belief		√		
Sexual Orientation		√		
Gender Reassignment		√		
Marriage/Civil Partnership		√		
Pregnancy /Maternity /Paternity		√		

Please comment on any areas where some or substantial impact is indicated. Any resulting actions must be added to the below action plan.

5.   **Is there anything that cannot be changed?**

What cannot be changed?	Can this be justified?	If so, how?
Not applicable		
E.g., Disabled people can be treated more favourably under the Disability Discrimination Act 2005. If a policy appears to treat disabled people more favourably than other equality groups, the disadvantage may be justifiable		

Please list the main actions that you plan to take as a result of this assessment in your area
of responsibility. (Continue on separate sheets as necessary)

Action Plan:

To review student and staff feedback, and to inform future changes to policy.