



Farnborough College
of Technology

Safeguarding and Child Protection Policy & Procedures

Owner	Vice Principal Teaching, Safeguarding, Pastoral & Performance Excellence
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Content	Page
Policy Statement, Purpose and Scope	1
Monitoring & Review, Legislations and Related Policies and Procedures	2
Roles and Responsibilities Within the College	3
Staff Training and Induction and Safer Recruitment	5
Off Site Visits, First Aid and Mental Health	6
Arrangements for Specific Groups of Learners	7
Intimate and Personal Care and Physical Use of Force	9
Farnborough College of Technologies Child Protection Procedures <ul style="list-style-type: none"> - Contextual Safeguarding - Confidentiality - Dealing with Disclosures - Anonymous Disclosures and Contacts - The Referral Process 	10
Appendix 1 - Procedure for Reporting Learner Safeguarding Concerns	14
Allegations Against Adults Working with Children and Young People	15
Safeguarding Definitions	17
Appendix 2 – Sexual violence & Sexual Harassment between Children in Schools and Colleges Assessment Needs Template	28
Appendix 3 - Briefing sheet for temporary staff (Agency/cover staff and contractors)	29
Appendix 4 – Intimate Care (Guidelines adapted from the Chailey Heritage Centre)	30
Appendix 5 – Links to Further Information	32
Appendix 6 – Useful Contacts	33

Farnborough College of Technology Child Protection Policy

Policy Statement

The Safeguarding and Child Protection Policy follows legislation and government guidance to keep children and young people at risk of harm safe whilst enrolled at college, which also includes the need to prevent young people from being radicalised and/or drawn into terrorism. All young people regardless of age, gender, race, ability, sexuality, religion, culture or language have a right to be protected from harm.

The College recognises its moral and statutory responsibility and through the implementation of this policy aims to safeguard and promote the welfare of all young people and makes every effort to provide a safe and welcoming environment. However, the College always maintains an attitude of "it could happen here" where safeguarding is concerned.

For guidance on vulnerable adults, please refer to the separate policy.

Purpose

This policy sets out the principles of safeguarding which informs our practice and approach across the organisation to protect children and young people at risk of harm and includes information on training and safer recruitment practice.

The aims of the policy are:

- To outline to all staff that safeguarding is everyone's responsibility.
- To provide staff with the framework to promote and safeguard the wellbeing of young people and in doing so ensure they meet their statutory responsibilities, including the duty to prevent young people from being radicalised and/or drawn into terrorism.
- To develop a safeguarding culture which enables staff to identify signs of risk/harm and to equip them with knowledge of how to escalate concerns.
- To outline the training that all staff can expect to receive to enable them to keep children and young people safe.
- To outline and adhere to the responsibilities of safer recruitment as outlined in Keeping Children Safe in Education (KCSiE) 2023.

Scope

This policy applies to all staff, including governors, volunteers, temporary/agency staff, contractors, visitors and learners. All staff must read this policy in conjunction with Keeping Children Safe in Education (KCSiE 2023) part 1 which is statutory guidance from the Department of Education.

The College will work in partnership with other agencies to protect young people and reduce risk throughout the child protection process to safeguard young people. However, whilst the College will work openly with parents as far as possible, the College reserves the right to contact Children's Social Care or the police, without notifying parents/guardians if this is in a learner's best interests.

Monitoring and Review

This policy will be reviewed at least annually by the Designated Safeguarding Lead (DSL) and Senior Management Team (SMT) in line with the Department of Education (DfE), Hampshire Safeguarding Children's Partnership (HSCP), Hampshire County Council (HCC) and any other relevant statutory guidance. The policy will also be shared and approved by the governing body.

Legislation

This policy is compliant with the following legislation and government guidance which have been used as references when producing this policy.

- Keeping Children Safe in Education (KCSiE) 2023
- Working together to Safeguard Children (2018)
- Equality Act 2010
- Guidance for Safer Working Practice in Education Settings (2020)
- Mandatory reporting of female genital mutilation: procedural information (updated 2020)
- Inspecting Safeguarding in Early Years, Education and Skills Settings (2019)
- Information sharing: advice for practitioners providing safeguarding services (2018)
- Promoting the education of looked- after children and previously looked- after children: Statutory guidance for local authorities (2018)
- Children and Families Act 2014
- The Children Act 2004
- Education Act 2002
- Prevent Duty Guidance for Further Education Institutions (2019)
- The Prevent Duty (2015)
- Sexual Offences Act 2003
- Disclosure & Barring Service 2013
- Hampshire Safeguarding Children Partnerships advice and guidance
- DFE Searching, screening and confiscation July 2022
- Further and Higher Education Act 1992
- DFE Use of reasonable force.

Related Policies and Procedures

This policy should be read in conjunction with the following college policies:

- Administration of Medicine Policy
- Anti-bullying Policy (Learners)
- Code of Conduct for College Staff
- Complaints Procedures
- Disclosure and Barring Service Policy and Procedure
- External Activities Guidance
- Fitness to Study Policy
- Guidelines on the Recruitment/Retention of Students with Criminal Convictions
- Health and Safety Policy & Procedures
- Prevent Strategy
- Public Disclosure (Whistleblowing) Policy
- Staff use of college computers, e-mail, and internet policy
- Student use of college computers, e-mail, and internet policy
- Substance Misuse Policy
- Visitors Policy
- Vulnerable Adults Policy

Roles and Responsibilities Within the College

Leadership and Management

The College has established clear lines of accountability, training, and advice to support the process and individual staff within that process. Any individual can contact the Deputy Designated Safeguarding Lead (DDSL) for their faculty in the first instance or the Designated Safeguarding Lead (DSL) if they have concerns about a young person.

The Safeguarding Team

All staff at the College are responsible for safeguarding learners. **The Designated Safeguarding Lead (DSL) for the College is Nicky Branson, Designated Safeguarding Lead and Learner Services Manager.** The Deputy Designated Safeguarding Leads (DDSLs) are Clare Grimwood, Assistant Principal, Clair Bryan, Assistant Principal, Gwen Grace Assistant Principal, Yvonne Pearce Assistant Principal, Scott Hutton, Assistant Principal, Pam Richardson Assistant Principal, Amanda Allbright Apprentice Programme Lead and Francesca Harrap, Aldershot Business Manager. The wider safeguarding team also includes Lisa Sparkes, Family Liaison Officer and Sarah Murphy, Safeguarding Administrative Officer. **The Corporation Board of Governor who has oversight for safeguarding is Nicholas Crippa.**

In addition to key responsibilities, the safeguarding team holds weekly safeguarding meetings. Together they identify and discuss any young people and adults that are vulnerable. Following this, effective strategies are arranged to support each learner.

Designated Safeguarding Lead responsibilities:

- To take the lead responsibility for safeguarding and child protection (including online safety and understanding the filtering and monitoring systems and processes in place).
- Refer cases to social care, and the police where appropriate, in a timely manner avoiding any delay that could place the child at more risk.
- Assist the Board of Governors in fulfilling their safeguarding responsibilities set out in legislation and statutory guidance.
- Attend appropriate training and demonstrate evidence of continuing professional development to carry out the role.
- Ensure every member of staff knows who the DSL is, is aware of the DSL role and has their contact details.
- Ensure all staff understand their responsibilities in being alert to the signs of abuse and responsibility for referring any concerns to the DSL.
- Liaise with HR to ensure that whole college training occurs regularly with at least annual updates so that staff and volunteers can fulfil their responsibilities.
- Ensure any members of staff joining the College outside of this training schedule receive induction prior to commencement of their duties.
- Keep records of child protection concerns securely and separately from the main learner file and use these records to assess the likelihood of risk.
- Ensure that copies of safeguarding records are transferred accordingly (separate from learner files) when a learner transfers college.
- Ensure that where a learner transfers college and is on a child protection plan or is a child looked after, the information is passed to the new college immediately and that the learner's social worker is informed. Consideration is given to a transition meeting prior to moving if the case is complex or ongoing.
- Link with the HSCP to make sure staff are aware of training opportunities and the latest local policies on safeguarding.
- Develop, implement, and review procedures that enable the identification and

- reporting of all cases, or suspected cases, of abuse.
- Provide termly reports to the Curriculum and Standards Committee on safeguarding matters.
- Meet any other expectations set out for DSL's in KCSiE 2023.

All Staff responsibilities

All staff have a key role to play in identifying concerns and in providing help for young people. To achieve this, they will:

- Will receive appropriate safeguarding and child protection training (including online safety, which, amongst other things, includes an understanding of the expectation, applicable roles and responsibilities in relation to filtering and monitoring), which should be regularly updated.
- Establish and maintain an environment where young people feel safe and Secure.
- Ensure young people know whom to approach if they are worried about problems.
- Plan and deliver opportunities within the curriculum for young people to develop the skills they need to recognise, assess, and manage risk appropriately and keep themselves safe.
- Attend training in order to be aware of and alert to the signs of abuse.
- Maintain an attitude of "it could happen here" with regards to safeguarding.
- Be aware that mental health problems can, in some cases, be an indicator that a young person has suffered, or is at risk of suffering abuse, neglect or exploitation.
- Recognise that abuse, neglect, or other adverse childhood experiences, can have an impact on the mental health, behaviour, and education of young people.
- Raise concerns to the DDSL or DSL immediately and record information via 'MyConcern' as soon as practical that day.
- Support learners in line with their child protection or child in Need plan.
- Treat information with confidentiality but never promise to "keep a secret".
- Notify the Family Liaison Officer of any learner on a Child Protection or Child in Need plan who has unexplained absence.
- Have an understanding of 'Early Help' and be prepared to identify and support young people who may benefit from early help.
- Ensure they know who the Designated Safeguarding Lead (DSL) and Deputy DSLs are and how to contact them.
- Have an awareness of the Safeguarding Policy, and all other policies and procedures relating to safeguarding young people.

Senior Management Team responsibilities:

- Contribute to inter-agency working in line with Working Together to Safeguard Children 2018 guidance.
- Provide a coordinated offer of early help when additional needs of young people are identified.
- Ensure staff are alert to the various factors that can increase the need for early help (KCSiE 2023).
- Working with Children's Social Care, support their assessment and planning processes including the College's attendance at conferences and core group meetings.
- Carry out tasks delegated by the Board of Governors such as training of staff, safer recruitment and maintaining a single central register.
- Provide support and advice on all matters pertaining to safeguarding and child protection to all staff regardless of their position within the College.

- Treat any information shared by staff or learners with respect and follow Procedures.
- Ensure that allegations or concerns against staff are dealt with in accordance with guidance from Department for Education (DfE) Hampshire Safeguarding Children Partnership (HSCP) and Hampshire County Council (HCC).
- Determine if a concern about a member of staff is a 'low level concern' or an allegation.

Responsibilities of the Board of Governors

- Ensure that the College has effective safeguarding policies & procedures including a child protection policy, a staff code of conduct, a behaviour policy and a response to young people who are absent from education.
- Ensure HSCP is informed in line with local requirements about the discharge of duties via the annual safeguarding audit.
- Ensure that recruitment, selection, and induction follow safer recruitment practice including all appropriate checks.
- Ensure that allegations against staff are dealt with by the DSL and Principal. Allegations against the Principal are dealt with by the Chair of Governors.
- Ensure that a member of the Senior Management Team is identified as the Designated Safeguarding Lead (DSL) and has this recorded in their job description.
- Ensure that all staff undergo safeguarding and protection training (including online safety which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring) at induction. As a minimum staff will attend the Corporate Induction and be required to complete Safeguarding and Prevent Smartlog training. Refresher training happens at regular intervals throughout, when required.
- Ensure that any safeguarding deficiencies or weaknesses are remedied without delay.
- Ensure a nominated governor for safeguarding is identified.

Staff Training and Induction

Staff must ensure that they are aware of their responsibilities for safeguarding and be able to respond appropriately. Therefore, all staff and governors receive appropriate safeguarding and child protection training which commences at Induction and is regularly updated throughout each academic year. This includes online training programmes, staff meetings, staff training days and includes training on the use of the on-line safeguarding platform 'MyConcern.' Additionally, all staff are required to read part 1 of Keeping Children Safe in Education and all college policies relating to safeguarding young people and adults. Managers have overall responsibility to ensure their staff are also appropriately supported.

The Designated Safeguarding Lead, deputies and the wider safeguarding team undergo training to provide them with the knowledge and skills required to carry out the role, and training is updated at least every other year.

Safer Recruitment

The College operates a separate safer recruitment process as part of the Recruitment Procedure and the Disclosure and Barring Service Policy and Procedure. On all recruitment panels there is at least one member who has undertaken safer recruitment training. The process checks identity, criminal record (enhanced DBS), mental and physical capacity, right to work in the U.K., professional qualification and seeks confirmation of the applicant's experience and history through references. For further information please refer to Human Resources policies and procedures.

Site Security

The College aims to provide a secure site within which young people feel safe. By its nature the College is a diverse environment which brings together a broad range of individuals engaged in education and training. Therefore, several strategies are used to enhance site security. These are:

- All persons on the College site must wear and display the relevant identity card.
- Identity cards are displayed by the use of coloured lanyards, which identify whether an individual is a learner, a member of staff, a contractor or a visitor.
- Frequent compliance checks are carried out to ensure that persons on site are wearing the correct identity card and lanyard.
- Visitors are required to enter at main reception and must sign in.
- Patrols are undertaken by the College's safeguarding and security staff throughout the college day.
- An extensive network of CCTV is deployed throughout the College which is continuously monitored.
- Turnstiles are located at key entrance/exit points around the site and require an ID card for access.

Physical Intervention (use of reasonable force)

The use of physical intervention is rarely required within the context of the College. The College utilises the non-statutory DfE advice contained in 'Use of reasonable force: Advice for can be found at [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/444051/Use of reasonable force advice Reviewed July 2015.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/444051/Use_of_reasonable_force_advice_Reviewed_July_2015.pdf)

Off-site Visits

The College has a separate procedure detailing the processes used to ensure safety when young people are engaged in external activities. This can be found at <http://intranet.farn-ct.ac.uk/staff/policies-procedures/policies-and-procedures#H&S> .

First Aid

If First Aid is required as part of keeping learners safe, the College has a separate procedure detailing the arrangements for providing First Aid. This can be found at <http://intranet.farn-ct.ac.uk/staff/policies-procedures/policies-and-procedures#H&S>.

Mental Health

Teachers and tutors often get to know young people well and are, therefore, well placed to identify changes in behaviour that might indicate an emerging problem with the mental health and emotional wellbeing of learners. All staff should also 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.

The balance between the risk and protective factors are most likely to be disrupted when difficult events happen in learners' lives. These can include loss or separation, life changes and traumatic events. When concerns are identified, staff will provide opportunities for the young person to talk or receive support within the College environment. Parents may be informed of the concerns and if appropriate, a shared way to support the young person will be discussed. Where the needs require additional professional support, referrals will be made to the appropriate team or service with the parent's agreement.

Parental mental illness may also impact a young person, therefore, if staff become aware, or others suggest that a young person is suffering due to parental mental ill health, the information will be shared with the DSL to consider a referral to children's social care.

N.B

If staff have a mental health concern about a young person that is also a safeguarding concern, they will take immediate action, raising the issue with the designated safeguarding lead or a deputy. **If a young person is in immediate danger to themselves (suicidal ideation) they must be taken to Learner Services Reception where they will be met by one of the College Counsellors for crisis support.**

Arrangements for specific groups of learners

14–16-year-old Learners

Safeguarding issues relating to learners whose primary education provider is not Farnborough College of Technology remains the responsibility of their main provider. However, when onsite staff will ensure that appropriate safeguarding arrangements are followed, and staff will proactively share information with their primary education provider to ensure that effective communication reduces the risk of harm.

Learners who are Looked After or Leaving Care

The College recognises that learners who are looked after or leaving care have additional vulnerabilities and are at a higher risk of harm. To support these learners effectively, the Family Liaison Officer is responsible for ensuring these learners are supported at college and will liaise with faculty staff, virtual schools and the local authorities to provide regular information on attendance, progress, and achievement. Where appropriate, termly meetings to monitor and review Personalised Education Plans (PEPs) will be arranged and attended.

Private fostering is an arrangement by a parent for their child (under 16 or 18 if disabled) to be cared for by another adult who is not closely related and is not a legal guardian with parental responsibility for 28 days or more. It is not private fostering if the carer is a close relative'. Due to the ages of the young people at the College, private fostering issues are rarely found. However, the Law requires that carers and parents must notify children's services of any private fostering arrangement. Therefore, if the College becomes aware that a learner is being privately fostered, we will inform the children's services department and inform both the parents and carers that we have done so.

Young Carers

Young Carers provide care for another person, which could be a parent, relative or a sibling for reasons such as disability, chronic illness, mental health needs, or adults who are misusing drugs or alcohol. Young Carers can miss out on opportunities, have poor attendance or punctuality, struggle to complete homework, or engage with additional leisure activities. As a result, the College may refer a young carer to children's social care for a carers assessment to be carried out.

Young People Absent from Education

Young people education can be an indicator of either abuse or safeguarding risks. Learners and parents/guardians (if under the age of 18) must report absences through the College absence line, and parents/guardians will be notified of absences via the automated email system sent to the nominated emergency contact provided during enrolment. For those learners who are absent from education, particularly on repeat

occasions and / or long periods, these learners should be referred to the Attendance and Progress Tutors, so they can work with learners and families to identify what support is required to improve their attendance and learning.

Faculty staff remain responsible for the overall attendance of learners and should only refer them to the safeguarding team if they believe that the young person is at risk of harm or are already being monitored by the safeguarding team. The College has high expectations of a minimum of 90% attendance. Falling below could result in specific actions to improve attendance or could include a young person being withdrawn from their study programme. It is also worth noting that after a period of three consecutive weeks of non-explained absence, that a withdrawal will be actioned.

Young People with Family Members in Prison

Young people who have a family member in prison are at greater risk of poor outcomes including poverty, stigma, isolation, and poor mental health. The College aims to understand and respect their wishes and staff should be sensitive in lessons with consideration given to certain topics and signpost to additional support if needed.

Learners with English as a Second Language

The College will ensure that for learners where English is not their first language, information on safeguarding and prevent is provided in an accessible, visual format to promote full understanding. If necessary, the College will arrange translators to support learners when required.

Learners with a learning difficulty or disability

Learners who have special educational needs and/or disabilities can have additional vulnerabilities due to their additional needs and increased dependence on adults for care.

As a college we will respond to this by:

- Making it common practice to enable disabled young people to make their wishes and feelings known in respect of their care and treatment.
- Ensuring that disabled young people receive appropriate personal, health and social education.
- Making sure that all disabled young people know how to raise concerns and give them access to a range of adults with whom they can communicate. This could mean using interpreters and facilitators who are skilled in using the young person's preferred method of communication.
- Recognising and utilising key sources of support including staff in college, friends and family members where appropriate.
- Developing the safe support services that families want, and a culture of openness and joint working with parents and carers on the part of services.
- Ensuring that guidance on good practice is in place and being followed

Learners with Medical Conditions

The College will seek to ensure that sufficient staff are trained to support learners with a medical condition. All relevant staff will be made aware of the condition to support the young person and be aware of medical needs and risks to the young person. Specialist advice may be sought by the College Health Advisor and an individual healthcare plan may be put in place to support the young person and their medical needs. If a learner requires medication whilst onsite, please refer to the Administration of Medicine Policy for further guidance.

The Royal College of Paediatrics' and Child Health have added the term "Perplexing presentations" to the guidance around Fabricated or Induced Illness (FII). Perplexing Presentations (PP) have been introduced to describe those situations where there are indicators of possible FII which have not caused or brought on any actual significant harm. If the College is concerned that a young person may be suffering from fabricated or induced illness, we will inform children's social care.

Intimate and Personal Care

The provision of intimate care is currently rare in the College context. If intimate care were to be required, guidelines for good practice are provided in Appendix 4 (adapted from the Chailey Heritage Centre).

Farnborough College of Technology Child Protection Procedures

Contextual Safeguarding

All staff should be aware that safeguarding incidents and/or behaviours can be associated with factors outside the College and/or can occur between young people outside of our college. All staff, but especially the designated and deputy safeguarding leads should consider whether young people are at risk of abuse or exploitation in situations outside their families. Risk and harm outside of the family can take a variety of different forms and young people can be vulnerable to sexual exploitation, criminal exploitation, and serious youth violence in addition to other risks.

For us as a college, we will consider the various factors that have an interplay with the life of any young person about whom we have concerns within the College, and the level of influence that these factors have on their ability to be protected and remain free from harm, particularly when it comes to child exploitation or criminal activity. While this term applies to this specific definition, the notion of considering a young person within a specific context is also important. What life is like for a young person outside the College, within the home, within the family and within the community are key considerations when the DSL is looking at any concerns.

Confidentiality

The College recognises that the General Data Protection Regulations does not prevent, or limit, the sharing of information for the purpose of keeping children and young people safe. Further guidance is outlined in 'Working Together to Safeguard Children' (2018).

Safeguarding and promoting the welfare of young people is everyone's responsibility. To fulfil this all staff should consider what is in the best interests of the young person. This may mean respecting their right to confidentiality and sharing information only on a need-to-know basis. However, no single staff member can have a full picture of an individual's needs and circumstances. If young people and families are to receive the right help at the right time, everyone who comes into contact with them has a role to play in identifying concerns, sharing information, and taking prompt action.

If a staff member has a concern about the welfare or safety of a young person at risk, they must report this to a member of the safeguarding team and record this on MyConcern, the online reporting platform. Maintaining accurate records is an essential part of safeguarding practice, and MyConcern stores information securely and is only accessible by staff who need to know.

Where possible, consent should be sought from the individual the concern relates to and/or their parent (if they are under the age of 18) before sharing with an internal/external agency. However, information must be shared regardless of whether consent has been given if failure to share the information could put the young person at risk. All staff are aware that they cannot promise a young person to keep disclosure confidential.

Failure to follow up on a concern or share information that puts a learner at an increased risk of harm will be seen as a breach of this policy and followed up in line with the relevant HR procedure.

Dealing with Disclosures

A member of staff who is approached by a young person should follow the seven guiding principles:

Receive

- Listen to what is being said, without displaying shock or disbelief.
- Accept what is said and take it seriously.
- Make a note of what has been said as soon as practicable.

Reassure

- Reassure the learner, but only so far as is honest and reliable.
- Don't make promises you may not be able to keep e.g. 'I'll stay with you' or 'everything will be alright now' or 'I'll keep this confidential'.
- Do reassure e.g., you could say: 'I believe you' or 'I'm glad you came to me'.

Respond

- Respond to the learner only as far as is necessary to establish whether or not you need to refer the matter, but do not interrogate for full details.
- Do not ask 'leading' questions i.e., 'did he touch you?' Questions may invalidate your evidence (and the young person's) in any later prosecution in court.
- Do not criticise the alleged perpetrator; the learner may care about him/her, and reconciliation may be possible.
- Do not ask the learner to repeat it all for another member of staff. Explain what you have to do next and whom you have to talk to. Reassure the learner that it will be a senior member of staff.

Report

- Share concerns with the DDSL or DSL as soon as possible in person or phone.
- If you are not able to contact your DDSL or DSL, and the young person is at risk of immediate harm, contact a member of the Senior Management Team who will inform Children's Services directly.

Record

- If possible, make brief notes at the time, and record information through MyConcern as soon as possible, Handwritten notes can be scanned and uploaded onto MyConcern.
- Record the date, time, place, persons present and noticeable nonverbal behaviour, and words used by the learner. If the learner uses 'pet' words, record the actual words used, rather than translating them into 'proper' words.
- Record facts and observable things, rather than your 'interpretations' or 'assumptions'.
- Complete a body map on MyConcern to indicate the position of any noticeable bruising.

Remember

- Support the young person: listen, reassure, be available and signpost to support.
- Confidentiality is essential. Share your knowledge only with appropriate professional colleagues.

Review (led by DSL)

- Has the action taken provided good outcomes for the young person?
- Did the procedure work? Were any deficiencies or weaknesses identified in the procedure? Have these been remedied?
- Is further training required?

Receiving a disclosure can be upsetting for staff. In some cases, staff may wish to consult their line manager or the Employee Assistance Programme (EAP) for support.

Anonymous Disclosures and Contacts

On occasion learners may wish to raise concerns anonymously. If they wish to do so, they can make disclosures or raise concerns for others using the Student Help and Advice Reporting Page (SHARP) via the College website. [The SHARP System](#)

Parents/Guardians and members of the community can also raise concerns for a young person or vulnerable adult through SHARP although they may also choose to contact the Safeguarding Team directly by email or phone.

Emailing safe@farn-ct.ac.uk

Designated Safeguarding Line on 01252 407373

The Referral Process

Following concerns raised by staff, the DDSL and/or DSL will assess the information and consider if significant harm has happened or there is a risk that it may happen. If the evidence suggests the threshold of significant harm, or risk of significant harm has been reached; or they are not clear if the threshold is met, then the DSL will contact Children's Social Care. If the DSL is not available the Deputy DSL or, in their absence, a member of the Senior Management Team must be contacted who will refer directly to Children's Social Care and the police if necessary. The procedure for referral will apply equally where young people are considered to be at risk of significant harm from being radicalised and/or drawn into terrorism. The DSL will inform the parents prior to making a referral, however, there are situations where this may not be possible or appropriate.

N.B. The exception to this process will be in those cases of known FGM where there is a mandatory requirement for the teacher to report directly to the police. The DSL should also be made aware.

Safeguarding concerns are recorded on MyConcern, the on-line safeguarding system which provides a safe and confidential method for recording concerns about learners. Following escalation to the DDSL/DSL concerns must be recorded as soon as reasonably possible, but within 24hrs. A record of events may be used in court proceedings; therefore, it is essential that details are factual and correct.

It is important that concerns are followed up and it is everyone's responsibility to ensure that they are. The member of staff should be informed by the DSL/DDSL what has happened following the report being made. This update will be completed through 'MyConcern' where the member of staff will receive email notification. If they do not receive this information, they should be proactive in seeking it out.

If a staff member believes that their concerns have not been referred on or that the young person remains at risk, they should initially ask the DSL to reconsider, ensuring that the risks are understood. If this does not result in a satisfactory outcome, or the DSL rationale appears to miss the risk to the child, then the Whistleblowing procedures of the College should be followed. This procedure is outlined within the College's Public Disclosure Policy. Alternatively, you can contact the NSPCC whistleblowing line on 0800 028 0285.

If the DSL is unhappy with the response from Children Social Care, they should consider following the HSCP escalation protocol.

Following a report of concerns from a member of staff, the DSL must:

1. Decide whether or not there are sufficient grounds for suspecting significant harm in which case a referral. The rationale for this decision should be recorded by the DSL and must be made to Children's Social Care and the police if it is in keeping with the National Police Chief's Council ["When to call the Police"](#) guidance.
2. Normally the College should try to discuss any concerns about a learner's welfare with the family and where possible to seek their agreement before making a referral to Children's Social Care. However, in accordance with DfE guidance, this should only be done when it will not place the learner at increased risk or could impact a police investigation. Where there are doubts or reservations about involving the young person's family, the DSL should clarify with Children's Social Care or the police whether the parents should be told about the referral and, if so, when and by whom. This is important in cases where the police may need to conduct a criminal investigation. The learner's views should also be taken into account.
3. If there are grounds to suspect a young person is suffering, or is likely to suffer significant harm they must contact Children's Social Care of where the young person resides. In Hampshire this is via an Inter-Agency Referral Form (IARF) making a clear statement of:
 - the known facts
 - any suspicions or allegations
 - whether or not there has been any contact with the learner's family

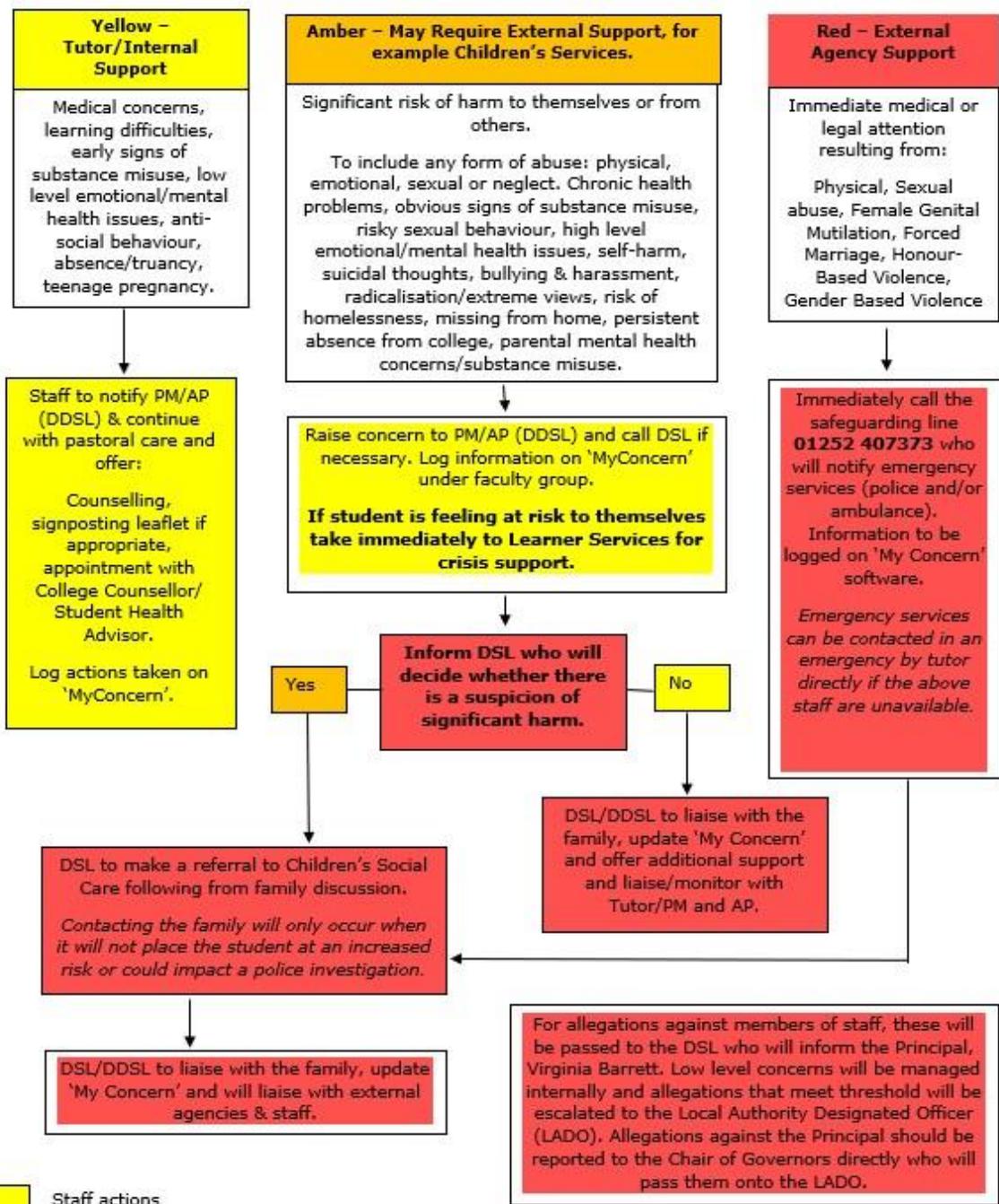
Referrals for other Local Authorities should be made by phone using the phone numbers within the contact's section. If the DSL feels unsure about whether a referral is necessary, they can phone Children's Reception Team (CRT) on 01329 225379 to discuss concerns.

4. If a young person is in immediate danger and urgent protective action is required, the police must be called. The DSL must then notify Children's Social Care of the occurrence and what action has been taken.
5. When a learner needs urgent medical attention and there is suspicion of parental abuse causing the medical need, the DSL or their Deputy should take the young person to the accident and emergency unit at the nearest hospital, while Children's Social Care are informed. Advice should be sought from Children's Social Care about informing the parents, remembering that parents should normally be informed that a young person requires urgent hospital attention.
6. If there is not a risk of significant harm, the DDSL will either actively monitor the situation in faculty or consider the Early Help process.
7. In cases of allegations against staff or low-level concerns, the HSCP procedure or the College Low Level Concerns (LLC) procedure will be followed.

Appendix 1

Procedure for Reporting Learner Safeguarding Concerns

It is advisable to contact parents (of learners under 18) unless there is further risk to the learner by disclosing information. Information may need to be shared, so do not promise to keep it to yourself. If in doubt whether to contact a parent, please consult with the DSL.



- Staff actions
- DDSL/DSL actions
- DSL involvement

Allegations Against Adults Who Work with Children and Young People

Working Together to Safeguard Children (2018) states that organisations should have clear policies for dealing with allegations against people who work with children.

Complaints against staff or low-level concerns

Complaints or low-level concerns can be managed independently by the College under internal procedures.

Complaints could include:

- Breaches of the Code of Conduct
- Any breach of data protection or confidentiality
- Poor behaviour management
- Inappropriate use of social media
- Misadministration of medication

Low-level concerns could include:

- Inappropriate use of language, shouting or swearing
- Being over-friendly or having favourites
- Taking photographs of young people on their personal mobile phones
- Engaging with a young person on a one-to-one basis in a secluded area or behind a closed door
- Using inappropriate sexualised, intimidating, or offensive language.
- Discussing personal or sexual relationships with, or in the presence, of learners
- Making (or encouraging others to make) unprofessional comments which scapegoat, demean or humiliate young people, or might be interpreted as such.
- Contacting young people via personal Social Media sites, texts, or emails

Allegations that meet the harm threshold

Allegations against staff, including temporary staff, volunteers, Governors, or any other adult who works in a college may include the following examples:

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

The LADO criteria for intervention will be assessed against the likelihood and impact of transferable risk to young people. When considering allegations of suitability, the LADO would consider the following situations:

- Parents of children who are placed on a CIN plan or are receiving Early Help
- Arrests for offences against adults.
- Presentation to other professionals around mental health, domestic abuse and/or substance misuse.
- Extreme political or religious viewpoints which could be considered Hate crime.
- Concerns about behaviour in their private lives which may impact on young people.

Referral Process for Staff Allegations

If a concern is raised about the practice or behaviour of a member of staff this information will be recorded and passed to the DSL who will inform the Principal, Virginia Barrett.

An assessment will be made in conjunction with the Director of Human Resources to determine if the matter is a 'low level concern' or an allegation that meets threshold. Low level concerns will be managed by the College, and allegations that meet threshold will escalate to the Local Authority Designated Officer (LADO), and relevant guidance will be followed. If there is any doubt about the level at which behaviour needs to be addressed, LADO advice will be taken.

If the allegation is against the Principal, the person receiving the allegation will contact the Chair of Governors via the Clerk to the Corporation (01252 407334) who will then contact the LADO. If the Chair of Governors is not available, then the LADO should be contacted directly.

There may be situations when the Principal or Chair of Governors will want to involve the police immediately, if the person is deemed to be an immediate risk to a young person or there is evidence of a possible criminal offence.

Safeguarding Definitions

Abuse

Abuse is 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 as far 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.

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 nonpenetrative 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. 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 in education (child on child abuse).

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, because of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing, and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate caregivers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs

Domestic Abuse:

The Domestic Abuse Act 2021 recognises the impact of domestic abuse on children, as victims in their own right, if they see, hear or experience the effects of abuse. Young people witnessing domestic abuse is recognised as 'significant harm' in law. These young people may become aggressive; display anti-social behaviours; suffer from depression or anxiety; or fail to reach their educational potential. If staff believe that a young person is living with domestic abuse, this will be reported to the designated safeguarding lead for referral to be considered to children's social care.

Sexual Violence and Sexual Harassment Between Children in Schools and Colleges (Child on Child Abuse)

Sexual violence and sexual harassment (SVSH) can occur between two children of any sex and age (under the age of 18). It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment as well as their emotional well-being. It is important that all victims are taken seriously and offered appropriate support.

Within the College all staff are made aware of what sexual violence and sexual harassment might look like and what to do if they have a concern or receive a report. Whilst any report of sexual violence or sexual harassment should be taken seriously, staff are aware it is more likely that females will be the victims of sexual violence and sexual harassment and more likely it will be perpetrated by males. This pattern of prevalence will not, however, be an obstacle to all concerns being treated seriously.

The College has a zero-tolerance approach to SVSH and is clear that it is not acceptable, will never be tolerated and is not an inevitable part of growing up. It cannot be described as 'banter', 'having a laugh' or 'boys being boys'. The College will also take seriously any sharing of sexual images (photos, pictures or drawings) and videos; sexual jokes, comments or taunting either in person or on social media; or on-line sexual harassment. Staff will challenge all contact behaviours that have a sexual nature to them such as pushing or rubbing against, grabbing bottoms, breasts or genitals, pinching or flicking bras, lifting skirts or pulling down trousers and impose appropriate levels of disciplinary action, to be clear that these behaviours are not tolerated or acceptable.

Staff should respond to all reports and concerns of child-on-child sexual violence and sexual harassment (physically and verbal), including those that have happened outside of college premises, and or online.

All staff are advised to maintain an attitude of "It could happen here".

Reports of sexual violence and sexual harassment are extremely complex to manage. It is essential that victims are protected, offered appropriate support and every effort is made to ensure their education is not disrupted. It is also important that other children, adult learners, and College staff are supported and protected as appropriate.

Child-on-child safeguarding concerns can be in person or online and can include physical, emotional, and sexual abuse. These can include:

- Violence, particularly pre-planned
- Forcing others to use drugs or alcohol
- Blackmail or extortion
- Threats and intimidation
- Indecent exposure, indecent touching, or serious sexual assaults, including rape
- Forcing others to watch pornography or take part in sexting
- Encouraging other young people to engage in inappropriate sexual behaviour (For example - having an older boyfriend/girlfriend, associating with unknown adults or other sexually exploited young people, staying out overnight)
- Creating and sharing sexually explicit images
- Photographing or videoing young people performing indecent acts

Risk Assessment

Following a report, the DSL/DDSL will make an immediate risk and needs assessment on a case-by-case basis.

The risk assessment will consider:

- The victim, especially their protection and support.
- The alleged perpetrator, their support needs, and any disciplinary action
- All other learners at the college.
- The victim and the alleged perpetrator sharing classes and space at college.

The risk assessment will be recorded and kept under review. Where there has been other professional intervention and/or other specialist risk assessments, these professional assessments will be used to inform the College's approach to supporting and protecting learners.

The DSL will consider:

- The wishes of the victim.
- The nature of the incident including whether a crime has been committed and the harm caused.
- Ages of the young people involved.
- Developmental stages including young people with EHCP's or additional learning needs.
- Any power imbalance between the young people.
- Any previous incidents.
- Ongoing risks.
- Other related issues or wider context.

Criminal Investigation into a rape, assault by penetration or sexual assault

Where there is a criminal investigation into a rape, assault by penetration or sexual assault, the alleged perpetrator should be removed from any classes they share with the victim. This may require the young person to transfer to an alternative course. In the event that this is not possible, the young person may be supported to find an alternative provider.

The victim, alleged perpetrator, and other witnesses (young people & adults) will receive appropriate support including allocation of a designated trusted adult. In most cases this will be the Family Liaison Officer.

Where a criminal investigation leads to a conviction or caution, the College will take suitable action. In all but the most exceptional of circumstances, the rape or assault is likely to constitute a serious breach of discipline and lead to the view that allowing the perpetrator to remain in the same college would seriously harm the education or welfare of the victim (and potentially other learners), therefore leading to a permanent exclusion.

If a report is determined to be unsubstantiated, unfounded, false or malicious, the DSL should consider whether the young person who has made the allegation is in need of help or may have been abused by someone else and whether this is a cry for help. In such circumstances, a referral to children's social care may be appropriate. However, if a report is shown to be deliberately invented or malicious, the College, will consider whether any disciplinary action is appropriate against the individual who made it in line with the College Disciplinary policy.

Online Safety

As a college it is essential that we safeguard young people from potentially harmful and inappropriate online material. A comprehensive approach to online safety empowers staff to protect and educate learners, and colleagues in their use of technology and establishes the following mechanisms to identify, intervene in, and escalate any concerns where appropriate.

- Internal systems monitor safe and appropriate internet use onsite and offsite if learners are using college laptops.
- Concerns identified are escalated to the DDSL/DSL and recorded on MyConcern.
- Programme Managers and staff will investigate and speak to the young person and parents (if appropriate).
- Concerns may be escalated to Children's Social Care if necessary, and consideration will be given to using the National Prevent Referral Form for concerns relating to radicalisation or extremism.
- Online safety concerns can be raised by learners via the Child Exploitation Online Protection (CEOP) command button on the College website or in person to a member of staff.

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

content: being exposed to illegal, inappropriate, or harmful content, for example: pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism.

contact: being subjected to harmful online interaction with other users; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.

conduct: personal online behaviour that increases the likelihood of, or causes, harm; for example, making, sending, and receiving explicit images (e.g., consensual and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying; and

commerce - risks such as online gambling, inappropriate advertising, phishing and or financial scams. If we feel pupils, learners or staff are at risk, we will report it to the Anti-Phishing Working Group (<https://apwg.org/>).

Social Media

With the current speed of on-line change, some young people have only a limited understanding of online risks and issues. Some may underestimate the effects of potentially harmful and inappropriate material on the Internet and may be unsure about how to respond. Some of the risks could be:

- unwanted contact
- grooming
- online bullying including sexting
- digital footprint
- accessing and generating inappropriate content

Cyberbullying

Central to the College's anti-bullying policy is the principle that '*bullying is always unacceptable*' and that '*all learners have a right not to be bullied*'. The College also recognises that it must take note of bullying perpetrated outside college, which affects learners when they are at college and so will respond to concerns about cyber-bullying carried out by learners when they are away from the site.

Cyber-bullying may be at a level where it is criminal in character. It is unlawful to disseminate defamatory information in any media including Internet sites. Section 127 of the Communications Act 2003 makes it an offence to send, by public means of a public electronic communications network, a message or other matter that is grossly offensive or one of an indecent, obscene, or menacing character. The Protection from Harassment Act 1997 makes it an offence to knowingly pursue any course of conduct amounting to harassment. If the College becomes aware of incidents of cyberbullying, we will consider each case individually, including whether any criminal act may have been committed. The College will pass on information to the police if it feels that it is appropriate or are required to do so.

Sexting

'Sexting' often refers to the sharing of naked pictures or 'nude' pictures or video through mobile phones and the Internet. It also includes underwear shots, sexual poses and explicit text messaging and is sometimes referred to as youth produced sexual imagery. While sexting often takes place in a consensual relationship between two young people, the use of sexted images in revenge following a relationship breakdown is becoming more commonplace. Sexting can also be used as a form of sexual exploitation and take place between strangers.

As a college we will:

- **Report** to the police, CEOP or any other relevant body any on-line sexual abuse or harmful content we are made aware of. This could include sending abusive, harassing and misogynistic messages; sharing nude and semi-nude images and videos; and coercing others to make and share sexual imagery. We will seek guidance from the NPCC ['when to call the police'](#) document and the internet watch foundations ['report harmful content'](#) website.
- **Educate** to raise awareness of what on-line sexual abuse is, how it can happen, how to limit the impact and what to do if you become aware of it.
- **Support** victims of on-line abuse within the college community.

Online Reputation

Online reputation is the opinion others get of a person when they encounter them online. It is formed by posts, photos that have been uploaded and comments made by others on people's profiles. It is important that young people and staff are aware that anything that is posted could influence their future professional reputation. The majority of organisations now check digital footprint before considering applications for positions or places on courses.

Grooming

Online grooming is the process by which a person with an inappropriate sexual interest in young people will approach a young person online, with the intention of developing a relationship, to be able to meet them in person and intentionally cause harm. Additionally, to being targeted for sexual motivations, some young people are also groomed online for exploitation or radicalisation. While the drivers and objectives are different, the actual process is broadly similar to radicalisation, with the exploitation of a person's vulnerability usually being the critical factor. Those who are targeted are often offered something ideological, such as an eternal spiritual reward, or sometimes something physical, such as an economic incentive, that will make them 'feel better' about themselves or their situation.

Upskirting

In 2019 the Voyeurism Offences Act came into force and made the practice of upskirting illegal. Upskirting is defined as someone taking a picture under another person's clothing without their knowledge, with the intention of viewing their genitals or buttocks, with or without underwear. The intent of upskirting is to gain sexual gratification or to cause the victim humiliation, distress, or alarm.

If staff in the College are made aware that upskirting has occurred, then this will be treated as a sexual offence and reported accordingly.

If technology that is designed for covert placement and could be used to take upskirting or indecent images is discovered in the College, it will be confiscated. If the technology is in location and potentially may have captured images, this will be reported to the police and left in situ so that appropriate forensic measures can be taken to gather evidence. Any confiscated technology will be passed to the Principal to make a decision about what happens to the items.

If the image is taken on a mobile phone, the phone will be confiscated under the same principles. This may need to be passed to the police for them to investigate, if there is evidence that a crime has been committed.

Taking and the use and storage of Images

As a college we will seek consent from the learner, and their parent if under 18, before taking and publishing photographs or videos that contain images that are sufficiently detailed to identify the individual in college publications, printed media or on electronic publications. We will not seek consent for photos where you would not be able to identify the individual.

Photographs and videos will be taken by members of staff and professional photographers/videographers. They will be deleted from memory cards/computers after being processed, and securely stored on the college network thereafter. No images of learners will be taken or stored on privately owned equipment by staff members.

Promoting safe and responsible use of the internet, social media and other electronic communication means is an essential part of our safeguarding practice. For this reason, this policy should be read in conjunction with the:

- E-safety code of conduct
- Student Charter
- Student use of College Computers, E-mail and Internet Policy
- Learner Disciplinary Policy.

Preventing Radicalisation and Extremism

The prevent duty requires that all staff are aware of the signs that a young person may be vulnerable to radicalisation. Risks will be considered for political; environmental; animal rights; or faith-based extremism that may lead to a young person becoming radicalised. In addition, other ideologies for example, 'incels' will also be considered.

There is no single way of identifying whether a young person is likely to be susceptible to an extremist ideology. Background factors combined with specific influences such as family and friends may contribute to a young person's vulnerability. Similarly, radicalisation and the grooming of young people can occur through many different methods, such as social media or the internet, and at different settings. As part of the preventative process resilience to radicalisation will be built through the promotion of fundamental British values through the curriculum.

Any young person who is considered vulnerable to radicalisation will be referred by the DSL to preventreferrals@hampshire.pnn.police.uk, using the National Prevent Referral Form. If the Police Prevent Officer considers the information to be indicating a level of risk a "channel panel" will be convened and the College will attend and support this process.

For further guidance please refer to the College Prevent Strategy.

Bullying

The College has established a separate anti-bullying policy that can be found at <http://intranet.farn-ct.ac.uk/your-college/policies-and-procedures/antibullying-policy/>

Gangs and Youth Violence

The vast majority of young people will not be affected by serious violence or gangs. However, where these problems do occur, even at low levels there will almost certainly be a significant impact. As a college we have a duty and a responsibility to protect our learners. It is also well established that success in learning is one of the most powerful indicators in the prevention of youth crime. Dealing with violence also helps attainment.

While learners generally see educational establishments as safe places, even low levels of youth violence can have a disproportionate impact on any education. Crucial preventive work can be done within college to prevent negative behaviour from escalating and becoming entrenched. As a college we will:

- develop skills and knowledge to resolve conflict as part of the curriculum.
- challenge aggressive behaviour in ways that prevent the recurrence of such behaviour.
- understand risks for specific groups, including those that are gender-based, and target interventions.
- safeguard, and specifically organise child protection, when needed
- make referrals to appropriate external agencies.
- cooperate with local partners in the prevention of anti-social behaviour or crime.

Gender Based Violence / Violence Against Women and Girls

<https://www.gov.uk/government/policies/violence-against-women-and-girls>

The Government has a strategy looking at specific issues faced by women and girls. Within the context of this policy the following sections address specific issues of violence against women and girls, including:

- Female genital mutilation (FGM) – illegal in the UK
- Breast ironing
- Forced marriage
- So-called Honour-based violence
- Teenage relationship abuse.

Female Genital Mutilation (FGM)

On the 31 October 2015, it became mandatory for teachers to report known cases of FGM to the police. 'Known' cases are those where either a girl informs the person that an act of FGM – however described – has been carried out on her, or where the person observes physical signs on a girl appearing to show that an act of FGM has been carried out and the person has no reason to believe that the act was, or was part of, a surgical operation within section 1(2)(a) or (b) of the FGM Act. In these situations, the DSL and/or Principal will be informed, and the member of teaching staff must call the police to report suspicion that FGM has happened. At no time will staff examine learners to confirm concerns.

For cases where it is believed that a female may be vulnerable to FGM or there is a concern that they may be about to be genitally mutilated, staff will inform the DSL who will report it as with any other child protection concern.

Forced Marriage

Alternative and further detail about the risk and impact of forced marriage can be found in the [multi-agency guidance of the forced marriage unit](#).

Prejudice Based Abuse

Prejudice based abuse or 'hate crime' is any offence which is perceived by the victim or another person to be motivated by hostility or prejudice. The offender doesn't have to go as far as being motivated by 'hate', they only have to exhibit 'hostility'. This can include prejudice towards a range of characteristics, including Disability, Age, Race, Religion, Gender identity, Sex or Sexual Orientation. As a college, we will investigate any concerns for prejudice-based abuse in line with other types of abuse.

Faith Abuse

Faith abuse is when child abuse is linked to accusations of "possession" or "witchcraft". If the College become aware of a young person who is being abused in this context, the DSL will follow the normal referral route into children's social care.

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 young people in the production of sexual images, forcing young people to look at sexual images or watch sexual activities, encouraging young people to behave in sexually inappropriate ways or grooming a young person in preparation for abuse including via the internet.

CSE can occur over time or be a one-off occurrence and may happen without the young person's immediate knowledge e.g., through others sharing videos or images of them on social media. CSE can affect any young person who has been coerced into engaging in sexual activities. This includes 16- and 17-year-olds who can legally consent to have sex. Some young people may not realise they are being exploited e.g., they believe they are in a genuine romantic relationship. Any young person can be targeted. However, those from particular groups can be vulnerable including:

- young people with learning difficulties.
- looked after children.
- young carers.
- those with a history of abuse or neglect.
- those with mental health problems.
- those who use drugs or alcohol.
- those who go missing from home or college.
- those involved in crime.
- those with parents/carers who have mental health problems.
- those who associate with other young people involved in exploitation.

The DSL may use the child exploitation risk assessment form (CERAF) and associated guidance from the Hampshire Safeguarding Children Partnership (HSCP) to identify learners who are at risk and the DSL will share this information as appropriate with children's social care. The College also recognises that we may have information or intelligence that could be used to both protect young people and prevent risk. Any relevant information that we have will be shared on the community partnership information (CPI) form which can be downloaded from <https://www.safe4me.co.uk/portfolio/sharing-information/>

Child Criminal Exploitation (including county lines)

Child Criminal Exploitation (CCE) is defined as: - *'where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child or young person under the age of 18 into any criminal activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial or other advantage of the perpetrator or facilitator and/or (c) through violence or threat of violence. The victim may have been criminally exploited even if the activity appears consensual. Child Criminal Exploitation does not always involve physical contact, it can occur through the use of technology'*

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.

A current trend in criminal exploitation of children and young people are 'county lines' which refer to a 'phone line through which drug deals can be made. An order is placed on the number and typically a young person will deliver the drugs to the specified address and collect the money for the deal. These lines are owned and managed by organised crime gangs, often from larger cities, who are expanding their markets into rural areas. Young

people are often recruited to move drugs and money between locations and are known to be exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection. Young people can easily become trapped by this type of exploitation, as county lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

Indicators that a young person may be criminally exploited include:

- Increase in **Missing episodes** – particular key as young people can be for days and drug run in other Counties.
- Having unexplained amounts of money, **new high cost items** and multiple mobile phones.
- Increased social media and phone/text use, almost always secretly.
- **Older males** in particular seen to be hanging around and driving.
- Having injuries that are unexplained and unwilling to be looked at .
- Increase in **aggression, violence and fighting.**
- Carrying **weapons** – knives, baseball bats, hammers, acid.
- Travel receipts that are unexplained.
- **Significant absences** from education and disengaging from previous positive peer groups.
- Association with other young people involved in exploitation.
- Young people who misuse drugs and alcohol.
- Parent concerns and significant changes in behaviour that affect emotional wellbeing.

The College will treat any young person who may be criminally exploited as a victim in the first instance using the CERAF form for guidance and refer to children's social care. If a referral to the police is also required, as crimes have been committed on the College premises, these will also be made.

If there is information or intelligence about child criminal exploitation, we will report this to the police via the community partnership information form.

<https://www.safe4me.co.uk/portfolio/sharing-information/>

Drugs and Substance Misuse

The College has established a separate substance misuse policy that can be found at http://intranet.farn-ct.ac.uk/staff/policies_procedures/safeguarding/substance-misuse-policy.pdf Parental substance misuse of drugs or alcohol becomes relevant to child protection when parenting capacity is likely to be seriously impaired or that undue caring responsibilities are likely to be falling on a young person in the family. If staff believe that a young person is living with parental substance misuse, this will be reported to the DDSL/DSL for referral to be considered for children's social care.

Young People Missing from Home or Care

It is known that young people who go missing are at risk of suffering significant harm, including specific risks around exploitation. The police will prioritise all incidents of missing young people and authorities will be alerted to the risk of sexual exploitation or involvement in drugs, gangs or criminal activity, trafficking and be aware of local "hot spots", as well as concerns about any individuals with whom children might runaway. Child protection procedures must be initiated in collaboration with children's social care services whenever there are concerns that a young person who is missing may be suffering, or likely to suffer, significant harm. As a college we will inform all parents of young people who are absent (unless the parent has informed us). If the parent is unaware of the location of their child, and the definition of missing is met, we will support the parent to contact the police to inform them. Within Hampshire the acronym MET is used to identify all young people who are missing; believed to be at risk of or being sexually exploited; or who are at risk of or are being trafficked.

Child Abduction

Child abduction is the unauthorised removal or retention of a minor from a parent or anyone with legal responsibility for the child. Although uncommon in older children, child abduction can be committed by parents or other family members; by people known but not related to the victim and by strangers. Further information is available at:

www.actionagainstabduction.org If the College becomes aware of an abduction, we will contact the police and children's social care (if they are not already aware). If we are made aware of a potential risk of abduction, we will seek advice and support from police and children's social care to confirm that they are aware and seek clarity on what actions we are able to take.

Serious Violence

Serious violence is becoming a factor for those who are involved in criminal exploitation. It can also be an indication of gang involvement and criminal activity. These indications can include but are not limited to: increased absence from college; a change in friendships or relationships with older individuals or groups; a significant decline in performance; signs of self-harm; significant change in wellbeing; signs of assault; unexplained injuries; unexplained gifts and/or new possessions; possession of weapons. 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/college, having experienced child maltreatment and having been involved in offending, such as theft or robbery. Advice for staff can be found in in the Home Office's [Preventing youth violence and gang involvement](#)

As a college we have a duty to not only prevent the individual from engaging in criminal activity, but also to safeguard others who may be harmed by their actions. We will report concerns of serious violence to police and social care. If there is information or intelligence about potential serious violence, we will report this to the police via the community partnership information form. <https://www.safe4me.co.uk/portfolio/sharing-information/>

Trafficked Young People and Modern Slavery

Modern slavery encompasses human trafficking, slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs. Any young person transported for exploitative reasons is considered to be a trafficking victim. There is significant evidence that young people (both of UK and other citizenship) are being trafficked internally within the UK and this is regarded as a more common form of trafficking in the UK. When considering modern slavery, there is a perception that this is taking place overseas. However, the government estimates that tens of thousands of slaves are in the UK today. Young people being forced to work in restaurants, nail bars, car washes and harvesting fruit, vegetables or other foods may have all been slaves 'hiding in plain sight' within the U.K and rescued from slavery. Other forms of slavery such as sex slaves or household slaves are more hidden but have also been rescued within the UK. If staff believe that a young person is being trafficked, this will be reported to the DDSL/DSL for referral to be considered to children's social care.

Homelessness

As a college we recognise that being homeless or being at risk of becoming homeless presents a real risk to a young person's welfare. The impact of losing a place of safety and security can affect a young person's behaviour and attachments. In line with the Homelessness Reduction Act 2017 the College will promote links into the Local Housing Authority for the parent or care giver in order to raise/progress concerns at the earliest opportunity. We recognise that whilst referrals and/or discussion with the Local Housing Authority should be progressed as appropriate, this does not, and should not, replace a referral into children's social care where a child has been harmed or is at risk of harm.

Appendix 2

Sexual Violence and Sexual Harassment between Children Risk and Needs Assessment Template

(This template is offered as a framework and should be seen as a starting point for development. Each reported incident should be managed on a case-by-case basis)

Template:

Presenting behaviours	What are the risks? Who might be harmed & how?	Action	Action by Who?	Action by when?	Action status or Date Completed & Outcome including further actions

Appendix 3

Briefing sheet for temporary staff (Agency/cover staff and contractors)

While working in Farnborough College of Technology, you have a duty of care towards the young people/learners here. This means that at all times you should act in a way that is consistent with their safety and welfare.

In addition, if at any time, you have a concern about a young person, particularly if you think they may be at risk of abuse or neglect, it is your responsibility to share that concern with the College **Designated Safeguarding Lead (DSL), who is Nicky Branson** or the Deputy DSLs, Assistant Principals, Clair Bryan, Clare Grimwood, Gwen Grace, Yvonne Pearce, Scott Hutton, Pam Richardson, Amanda Allbright (Apprenticeship Programme Lead) or Francesca Harrap (Business Manager – Aldershot Campus). The DSL/DDSs can be contacted via the direct safeguarding line 01252 407373. Alternatively, 01252 407181 (Nicky Branson), or 01252 407619 (Francesca Harrap). This is not an exhaustive list, but you may have become concerned as a result of:

- observing a physical injury, which you think may have been non-accidental.
- observing something in the appearance of a young person which suggests they are not being sufficiently well cared for.
- observing behaviour that leads you to be concerned about a young person.
- a young person telling you that they have been subjected to some form of abuse.
- observing adult behaviour that leads you to be concerned about their suitability to work with young people.

In any of the circumstances listed here, you must write down what you saw or heard, date and sign your account, and give it to the DSL as soon as possible and no longer than 24 hours later. This may be the beginning of a legal process – it is important to understand that legal action against a perpetrator can be seriously damaged by any suggestion that the young person has been led in any way.

If a young person talks to you about abuse, you should follow these guidelines:

- Rather than directly questioning the young person, just listen and be supportive.
- Never stop a young person who is freely recalling significant events, but don't push the young person to tell you more than they wish.
- Make it clear that you may need to pass on information to staff in other agencies who may be able to help – do not promise confidentiality. You are obliged to share any information relating to abuse or neglect.
- Write an account of the conversation immediately, as close to verbatim as possible. Put the date and timings on it, and mention anyone else who was present. Then sign it, and give your record to the Designated Safeguarding Lead (DSL), who should contact Children's Social Care if appropriate.

The College has a policy on safeguarding young people which you can find, together with the local procedures to be followed by all staff, on the College intranet.

If your concern involves the DSL or a member of the senior staff, contact the LADO on 01962 847364 or the NSPCC whistleblowing line on 0800 028 0285.

Remember, if you have a concern, report it.

Appendix 4: Intimate care

Guidelines for good practice adapted from the Chailey Heritage Centre

1. Treat every young person with dignity and respect and ensure privacy appropriate to the young person's age and the situation. Privacy is an important issue. Much intimate care is carried out by one staff member alone with one young person. The Local Safeguarding Children Partnerships (LSCPs) believe this practice should be actively supported unless the task requires two people. Having people working alone does increase the opportunity for possible abuse. However, this is balanced by the loss of privacy and lack of trust implied if two people have to be present - quite apart from the practical difficulties. It should also be noted that the presence of two people does not guarantee the safety of the young person - organised abuse by several perpetrators can, and does, take place. Therefore, staff should be supported in carrying out the intimate care of young people alone unless the task requires the presence of two people. The LSCPs recognise that there are partner agencies that recommend two carers in specific circumstances. Where possible, the member of staff carrying out intimate care should be someone chosen by the young person. For older young people it is preferable if the member of staff is the same gender as the young person. However, this is not always possible in practice. Agencies should consider the implications of using a single named member of staff for intimate care or a rota system in terms of risks of abuse.
2. Involve the young person as far as possible in his or her own intimate care. Try to avoid doing things for a young person that s/he can do alone, and if a young person is able to help ensure that s/he is given the chance to do so. This is as important for tasks such as removing underclothes as it is for washing the private parts of a young person's body. Support young people in doing all that they can themselves. If a young person is fully dependent on you, talk with her or him about what you are doing and give choices where possible.
3. Be responsive to a young person's reactions. It is appropriate to "check" your practice by asking the young person - particularly a young person you have not previously cared for - "Is it OK to do it this way?"; "Can you wash there; "How does your parent do that?". If a young person expresses dislike of a certain person carrying out her or his intimate care, try and find out why. Conversely, if a young person has a "grudge" against you or dislikes you for some reason, ensure your line manager is aware of this.
4. Make sure practice in intimate care is as consistent as possible. Line managers have a responsibility to ensure their staff have a consistent approach. This does not mean that everyone has to do things in an identical fashion, but it is important that approaches to intimate care are not markedly different between individuals. For example, do you use a flannel to wash a young person's private parts rather than bare hands? Do you pull back a young person's foreskin as part of daily washing? Is care during menstruation consistent across different staff?
5. Never do something unless you know how to do it. If you are not sure how to do something, ask. If you need to be shown more than once, ask again. Certain intimate care or treatment procedures, such as rectal examinations, must only be carried out by nursing or medical staff. Other procedures, such as giving rectal valium, suppositories or intermittent catheterisation, must only be carried out by staff who have been formally trained and assessed as competent.

6. If you are concerned that during the intimate care of a young person:

- You accidentally hurt the young person
- The young person seems sore or unusually tender in the genital area
- The young person appears to be sexually aroused by your actions
- The young person misunderstands or misinterprets something
- The young person has a very emotional reaction without apparent cause (sudden crying or shouting).

Report any such incident as soon as possible to another person working with you and make a brief written note of it. This is for two reasons: first, because some of these could be cause for concern, and secondly, because the young person or another adult might possibly misconstrue something you have done.

7. Additionally, if you are a member of staff who has noticed that a young person's demeanor has changed directly following intimate care, e.g., sudden distress or withdrawal, this should be noted in writing and discussed with your designated person for child protection.

8. Encourage the young person to have a positive image of her or his own body. Confident, assertive young people who feel their body belongs to them are less vulnerable to abuse. As well as the basics like privacy, the approach you take to a young person's intimate care can convey lots of messages about what her or his body is "worth". Your attitude to the young person's intimate care is important. As far as appropriate and keeping in mind the young person's age, routine care of a young person should be enjoyable, relaxed and fun.

Intimate care is to some extent individually defined, and varies according to personal experience, cultural expectations and gender. The LSCPs recognise that young people who experience intimate care may be more vulnerable to abuse: -

- Young people with additional needs are sometimes taught to do as they are told to a greater degree than other young people. This can continue into later years. Young people who are dependent or over-protected may have fewer opportunities to take decisions for themselves and may have limited choices. The young person may come to believe they are passive and powerless.
- Increased numbers of adult carers may increase the vulnerability of the young person, either by increasing the possibility of a carer harming them, or by adding to their sense of lack of attachment to a trusted adult.
- Physical dependency in basic core needs, for example toileting, bathing, dressing, may increase the accessibility and opportunity for some carers to exploit being alone with and justify touching the young person inappropriately.
- Repeated "invasion" of body space for physical or medical care may result in the young person feeling ownership of their bodies has been taken from them.
- Young people with additional needs can be isolated from knowledge and information about alternative sources of care and residence. This means, for example, that a young person who is physically dependent on daily care may be more reluctant to disclose abuse, since they fear the loss of these needs being met. Their fear may also include who might replace their abusive carer.

Appendix 5

Links to Further Information:

Any links to local or national advice and guidance can be accessed via the safeguarding in education webpages:

[Hants Gov - Safeguarding Guidance](#)

Links to online specific advice and guidance can be found at

[Hants Gov - Online Safety](#)

Links to other pages from the local authority on safeguarding can be found at

[Hants Gov - Safeguarding Children & Young People](#)

Hampshire Children's Safeguarding Partnership

[Homepage - Hampshire SCP](#)

Keeping Children Safe in Education (2023) – Part One

[Keeping Children Safe in Education 2023](#)

Keeping Children Safe in Education (2023) – Whole Document

[Keeping Children Safe in Education 2023 Whole Document](#)

Working Together to Safeguard Children (2018)

[Working Together to Safeguard Children 2018 \(publishing.service.gov.uk\)](#)

Government guidance on searching, screening and confiscation

[Searching, screening and confiscation in schools - GOV.UK \(www.gov.uk\)](#)

Appendix 6

Useful contacts

Key Personnel	Name (s)	Telephone No.
Safeguarding Line	DSLs	01252 407373 safe@farn-ct.ac.uk
DSL	Nicky Branson	01252 407181
Deputy DSL(s)	Amanda Allbright (Apprentices) Clair Bryan (CSCS) Claire Grimwood (AAP) Gwen Grace (ECS) Scott Hutton (CE) Yvonne Pearce (ECS) Pam Richardson (Maths, English & ESOL) Francesca Harrap (Aldershot)	01252 407448 01252 407208 01252 407296 01252 407157 01252 407250 01252 407256 01252 407459 01252 407619
College's named "Prevent" lead	Nicky Branson	01252 407181
College's named Mental Health Lead	Matthew Wilkie	01252 407021
Nominated governor responsible for Safeguarding	Nicholas Crippa	Clerk to Corporation, 01252 407334
Children's Reception Team (CRT) MASH	Hampshire <i>(Referrals for Hampshire to be submitted online using an IARF) Inter agency referral form</i>	01329 225379 (Professionals) 0300 555 1384 – General 0300 555 1373 – Out of hours
Children's Single point of Access (C-SPA)	Surrey	0300 470 9100 01483 517898 – Out of hours
Multi Agency Safeguarding Hub (MASH)	Berkshire	01344 352005 01344 352000 – Out of hours
Police	Hampshire/Surrey	101 or in emergencies 999
Safeguarding Advisors / Local Authority Designated Officers (LADOs)	Barbara Piddington Fiona Armfield	HCC Safeguarding Unit 01962 876364 LADO service initial enquiry form- (office.com) LADO REFERRAL NOTIFICATION FORM (Page 1 of 13) (office.com)
Student Health Advisor		01252 407067