

LINK19 COLLEGE



Safeguarding Children and Vulnerable Adults Policy

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Safeguarding Children and Vulnerable Adults Policy

Key LINK19 College contacts

Designated Safeguarding Adult Lead ('DSAL'):

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Deputy Designated Safeguarding Adult Lead ('DSAL'):

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Named Safeguarding Director of LINK19 College Ltd:

Mrs Maddie Arnold-Jones
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Key contact personnel and Designated Safeguarding Leads of partner organisations

North Kent College

Senior Designated Safeguarding Lead – Rhiannon Hughes

Ifield School Lead Designated Safeguarding Lead

Mrs Maddie Arnold-Jones – Headteacher

Deputy Designated Safeguarding Leads

Ifield School

Mrs Maddie Arnold-Jones – Headteacher

Mrs Sam Hargood – Sixth Form Lead

Mr Paul Jackson – Deputy Director

Named Safeguarding Governor for The Cedar Federation: Mr Brian Williams

This is a core policy that forms part of the induction for all staff. It is a requirement that all members of staff have access to this policy and sign to say that they have read and understood its content and Part One, [Keeping Children Safe In Education](#).

This policy will be reviewed at least annually and / or following any updates to national and local guidance procedures.

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Why are you concerned?

- For example
 - Something a young person has said – e.g., allegation of harm
 - Learner's appearance – may include unexplained marks as well as dress
 - Behaviour change
 - Witnessed concerning behaviour

Act immediately record your concerns (If urgent, speak to DSAL first)

- Follow the LINK19 College's safeguarding procedure ([Immediately record concerns and share with DSAL](#))
 - Reassure the learner
 - Clarify concerns if necessary (**TED**: Tell, Explain, Describe)
 - Use learner's own words
 - Sign and date your records

Inform the Designated Safeguarding Adult Lead

DSAL: Mr Martin Francis – LINK19 College Lead

Named Safeguarding Director: Mrs Maddie Arnold-Jones

Consider: is the learner at immediate risk of harm e.g., unsafe to go home?
If so, then the DSAL must be informed immediately.

Designated Safeguarding Adult Lead

- Consider whether the learner is at immediate risk of harm. E.g., unsafe to go home
- Access the Kent Safeguarding Support Level Guidance document and procedures: www.kscmp.org.uk
- Refer to other agencies as appropriate e.g., Internal or community services, LADO (local authority designated officer), Police or Request for support. If unsure, then consult with The Central Duty Team Kent Adult Safeguarding Team (03000 416161)

If you are unhappy with the response Staff:

- Follow local escalation procedures
 - Seek advice from the Central Duty Kent Adult Safeguarding Team (03000 416161)
 - [Follow the LINK19 College Whistleblowing Procedure](#)
 - [Contact the Safeguarding Director](#)
- Learners and Parents:**
- Follow LINK19 College complaints procedures ([available upon request from the LINK19 College office and website](#))

Record decision making and action taken in the learner's safeguarding file

Monitor

Be clear about:

- What you will monitor e.g., behaviour trends, appearance etc.
- How long you will monitor
- Where, how and to whom you will feedback and how you will record

Review and request further support (if necessary)
recording reviews and referrals in writing

At all stages the learner's circumstances will be kept under review
The DSAL/Staff will request further support if required to ensure the **learner's safety is paramount**

In the event of the DSL and all Deputy DSLs being unavailable at the college with a concern, please contact the DSL from the other college, either LINK19 College, Ifield or NKC

1. Introduction and ethos

- LINK19 College recognises its statutory safeguarding responsibilities. Safeguarding is everybody's responsibility and all those directly connected (staff, volunteers, governors, leaders, parents, families and learners) are an important part of the wider safeguarding and have an essential role to play in making this community safe and secure.
- Staff working with learners at LINK19 College are advised to maintain an attitude of 'it could happen here' where safeguarding is concerned.
- The best interests of learners always come first. All learners have a right to be heard and to have their wishes and feelings taken into account and all LINK19 College learners regardless of age, gender, ability, culture, race, language, religion or sexual identity, have equal rights to protection.
- LINK19 College recognises the importance of providing an ethos and environment within the provision that will help learners to be safe and feel safe. In LINK19 College, learners are respected and encouraged to talk openly. All LINK19 College staff understand safe professional practice and adhere to our safeguarding policies.
- LINK19 College core safeguarding principles are:
 - **Prevention** (e.g., positive, supportive, safe culture, curriculum and pastoral opportunities for learners, safer recruitment procedures);
 - **Protection** (by following the agreed procedures, ensuring all staff are trained and supported to recognise and respond appropriately and sensitively to safeguarding concerns);
 - **Support** (for all learners, parents and staff, and where appropriate specific interventions are required for those who may be at risk of harm);
 - **Working with parents and other agencies** (to ensure timely, appropriate communications and actions are undertaken when safeguarding concerns arise).
- LINK19 College expects that if any member of our community has a safeguarding concern about any learner, they should act and act immediately.
- This policy is implemented in accordance with our compliance with statutory guidance from the Department for Education, 'Keeping Children Safe in Education' (KCSIE).
- The procedures contained in this policy apply to all staff, including directors, temporary or third-party agency staff and volunteers and are consistent with those outlined within KCSIE 2024.
- This policy is formulated in recognition that abuse of vulnerable adults is widespread, but frequently unrecognised in our society. Abuse can take place in any situation, care setting or college, as well as at home. Perpetration of abuse may be by someone in a position of trust, power or authority that uses their position to the detriment of the health, safety or welfare and general well-being of a vulnerable person. The perpetrator may be a relative with a voluntary or professional care role, friend or family member, or those charged with a voluntary or professional care role, another service user or a stranger.

2. Policy Context

- This policy has also been developed in accordance with the principles established by related guidance, including:
 - Ofsted: Education Inspection Framework
 - Kent and Medway Safeguarding Procedures
 - The Education Act 2002
 - The Education (Independent School Standards) Regulations 2014
 - The Non-Maintained Special Schools (England) Regulations 2015
 - The Human Rights Act 1998
 - The Equality Act 2010 (including the Public Sector Equality Duty)

3. Definition of Safeguarding

- LINK19 College is required to comply with Part 2 (The Management of Safeguarding) of KCSIE to ensure delivery with a view to safeguarding and promoting the welfare of high needs learners aged up to 25 receiving education or training at LINK19 College or under the auspices of LINK19 College in an environment outside the direct control of LINK19 College, including the adoption of safer recruitment procedures, in Part 3 (Safer Recruitment) of KCSIE. *In doing so, LINK19 College is required to make those arrangements as if such Learners are children.* In line with KCSIE, safeguarding and promoting the welfare of learners is defined as:
 - Protection from maltreatment.
 - Preventing impairment of mental and physical health or development.
 - Ensuring that learners grow up in circumstances consistent with the provision of safe and effective care; and
 - Taking action to enable learners to have the best outcomes.
- Safeguarding includes a wide range of specific issues including (but not limited to):
 - Abuse and neglect
 - Bullying (including cyberbullying)
 - Learner-on-learner abuse
 - Learners with family members in prison
 - Learner missing from home
 - Criminal or Sexual Exploitation
 - Contextual Safeguarding (Risks outside the family home)
 - County Lines
 - Domestic Abuse
 - Drugs and alcohol misuse
 - Fabricated or induced illness
 - Faith abuse
 - Female Genital Mutilation (FGM)
 - Forced marriage
 - Gangs and youth violence
 - Gender based abuse and violence against women and girls
 - Hate
 - Homelessness

- Honour based abuse
- Human trafficking and modern slavery
- Mental health
- Missing learners
- Online safety
- Peer on Peer Abuse
- Preventing radicalisation and extremism
- Private fostering
- Relationship abuse
- Serious Violence
- Sexual violence and sexual harassment
- Upskirting
- Youth produced sexual imagery or “Sexting”

4. Related safeguarding policies

- This policy should be read and implemented in conjunction with the policies listed below. (to be read and followed alongside this document)
 - Positive Handling Policy
 - Searching, Screening and Confiscation
 - Online Safety
 - Anti-Bullying
 - GDPR and Data Protection
 - Photographic Image Use
 - Relationship & Sex Education
 - Personal Care
 - Health and Safety
 - Attendance
 - Risk Assessments
 - First Aid
 - Managing Allegations Against Staff
 - Staff code of conduct
 - Safer Recruitment
 - Whistleblowing
 - Supporting learners with medical conditions

Supporting Guidance (to be read and followed alongside this document)

- Keeping Children Safe in Education
- Safeguarding Vulnerable Groups Act 2006, by the Protection of Freedoms Act 2012
- Teachers Standards 2012
- Safeguarding Disabled Children– Practice Guidance - DOH, 2009
- Guidance for Safer Working Practice for Adults who Work with Children and Young People in Education Settings - Safer Recruitment Consortium, October 2015
- What to do if you are worried a child is being abused – DfE, March 2015
- KSCMP document: Safe Practice with Technology – Guidance for Adults who Work with Children and Young People
- KCC Guidelines for Safeguarding Record Keeping in Schools
- KCC Advice notes - Dealing with Disclosures in Schools

- No secrets: Guidance on developing and implementing multi-agency policies and procedures to protect vulnerable adults from abuse – 2010
- Safeguarding Adults – A National Framework of Standards for good practice and outcomes in adult protection work – 2005
- Mental Capacity Act 2005 – (Including the Deprivation of Liberty Safeguards (DoLS))

5. Policy Compliance, Monitoring & Review

- LINK19 College will review this policy annually. The policy will be revised following any national or local policy updates, any local safeguarding concerns and/or any changes to our procedures.
- All staff (including temporary staff and volunteers) and LINK19 Directors will be provided with a copy of this policy. Parents / carers can obtain a copy of it and other related policies. Additionally, some of our policies can be viewed via the LINK19 College website.
- The policy forms part of our quality improvement plan and will be reviewed annually by the board of directors which has responsibility for oversight of safeguarding systems.
- The Designated Safeguarding Adult Lead will ensure regular reporting on safeguarding activity and systems to the LINK19 College board, which will not receive details of individual learner situations or identifying features of families as part of oversight responsibility.

6. Key responsibilities

- The board of directors of LINK19 College have read and will follow KCSIE Part One (September 2024).
- LINK19 College has a nominated director for safeguarding named on the front of this document. The nominated director will support the DSAL and have oversight in ensuring that LINK19 College has an effective policy which interlinks with other related policies; that locally agreed procedures are in place and being followed; and that the policies and structures supporting safeguarding learners are reviewed at least annually and when required.
- The LINK19 College board of directors will ensure that the DSAL(s) is properly supported in their role.
- LINK19 College notify the ESFA where a referral has been made in either of the following circumstances (such notification must include the name of the institution, a high-level summary of the nature of the incident (without sharing personal information about victims or alleged perpetrators) and confirmation of whether it is, or is scheduled to be, investigated by the Local Authority and/or the police): a safeguarding concern related to sexual violence to Local Authority children's social care/adult social care and/or the police, or an allegation of abuse made against a teacher, lecturer or other member of staff to the designated officer(s) (at the local authority).

6.1 Designated Safeguarding Adult Lead (DSAL)

- LINK19 College has appointed a member of the leadership team (Mr Martin Francis –LINK19 College Lead) as the Designated Safeguarding Adult Lead (DSAL). The DSAL has the overall responsibility for the day-to-day oversight of safeguarding and learner protection systems in LINK19 College.
- Whilst the activities of the Designated Safeguarding Adult Lead may be delegated to the deputies, the ultimate lead responsibility for safeguarding and learner protection remains with the Designated Safeguarding Adult Lead and this responsibility will not be delegated.
- The DSAL will undergo appropriate and specific training to provide them with the knowledge and skills required to carry out their role. Deputy DSALs are trained to the same standard as the DSAL. The DSAL and any Deputy DSAL's training will be updated formally every two years but their knowledge and skills will be updated through a variety of methods (e.g. *e-Bulletins, conferences, local meetings, internal and external training*) at regular intervals, at least annually to keep up with any developments relevant to their role.
- **It is the role of the DSAL to:**
 - Act as the central contact point for all staff to discuss any safeguarding concerns
 - Maintain a confidential recording system for safeguarding and learner protection concerns
 - Coordinate safeguarding action for individual learners
 - When supporting learners with a social worker or care leavers, the DSAL should have the details of the learner's social worker (with the DSAL liaising closely with appropriate agencies.)
 - Liaise with other agencies and professionals in line with KCSIE
 - Ensure that locally established procedures as put in place by the three safeguarding partners (KSCMP) and / or Kent and Medway Safeguarding Adults Board (KMSAB), including referrals, are followed as necessary
 - Represent, or ensure the college is appropriately represented at multi-agency safeguarding meetings
 - Manage and monitor LINK19 College's role in any multi-agency plan for a learner
 - Be available during term time (during college hours) for staff in the college to discuss any safeguarding concerns
 - Help promote educational outcomes by sharing the information about the welfare, safeguarding and protection issues that learners are experiencing, or have experienced, with tutors and college leadership staff.
 - Ensure adequate and appropriate DSAL cover arrangements in response to any closures and out of hours and/or out of term activities
 - Ensure all staff access appropriate safeguarding training and relevant updates in line with the recommendations within KCSIE

6.2 Members of staff

- **All members of staff have a responsibility to:**
 - provide a safe environment in which learners can learn
 - be prepared to identify learners who may benefit from additional support
 - consider wider environmental factors in a learner's life that may be a threat to their safety and/or welfare
 - to understand LINK19 College's safeguarding policies and systems
 - to undertake regular and appropriate training which is regularly updated

- be aware of the process of making referrals to adult social care and statutory assessment
- know what to do if a learner tells them that they are being abused or neglected and understand the impact abuse and neglect can have upon a learner
- be able to identify and act upon indicators that learners are, or at risk of developing mental health issues
- know how to maintain an appropriate level of confidentiality
- be aware of the indicators of abuse and neglect so that they are able to identify cases of learners who may be in need of help or protection
- act in line with Teachers' Standards 2012 which state that teachers (including headteachers) should safeguard children's wellbeing and maintain public trust in the teaching profession as part of their professional duties.

6.3 Learners and young people

- **Learners have a right to:**
 - Feel safe, be listened to, and have their wishes and feelings taken into account
 - Contribute to the development of LINK19 College safeguarding policies
 - Receive help from a trusted adult
 - Learn how to keep themselves safe by recognising when they are themselves at risk and how to get help when they need it, including online

6.4 Parents and Carers

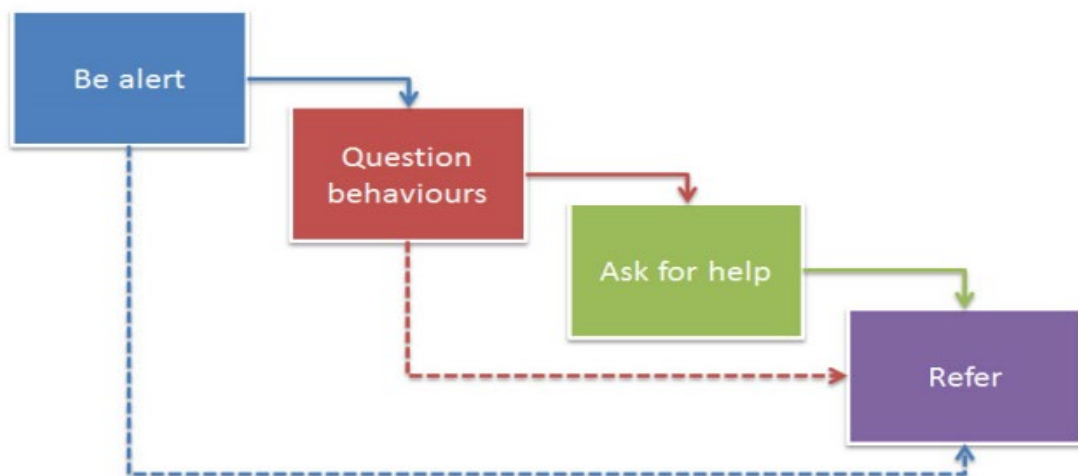
- **Parents/carers have a responsibility to:**
 - Understand and adhere to the relevant LINK19 College policies and procedures
 - Talk to learners about safeguarding issues with them and support LINK19 College in safeguarding approaches
 - Identify behaviours which could indicate that the learner is at risk of harm including online and seek help and support from LINK19 College, or other appropriate agencies.

7. Recognising Indicators of Abuse and Neglect

- All staff in LINK19 College are made aware of the definitions and indicators of abuse and neglect.
- Under this policy, learners aged 18 years and over are in the vulnerable adults category.
- LINK19 College recognise that when assessing whether a learner may be suffering actual or potential harm, the concern may be defined and include one or more of the following categories: -
 - Physical abuse
 - Sexual abuse
 - Emotional abuse
 - Neglect or acts of omission
 - Discriminatory abuse
 - Psychological abuse
 - Financial or material abuse
 - Institutional abuse

- Domestic Abuse

- All members of staff are expected to be aware of and follow this approach if they are concerned about a learner:
- LINK19 College recognises that technology can be a significant component in many safeguarding and wellbeing issues; learners are at risk of abuse online from people they know (including other young adults) and from people they do not know; in many cases, abuse will take place concurrently via online channels and in daily life.



‘What to do if you are worried a child is being abused’ 2015

- Members of staff are aware that concerns may arise in many different contexts and can vary greatly in terms of their nature and seriousness. The indicators of abuse and neglect can vary from learner to learner. Young adults develop and mature at different rates and all learners at LINK19 College have additional and or complex needs. What appears to be worrying behaviour for a particular learner may be less concerning for another due to the nature of individual needs.
- It is important to recognise that indicators of abuse and neglect do not automatically mean a learner is being abused however all concerns should be taken seriously and explored by the DSAL on a case-by-case basis.
- Parental behaviours may also indicate abuse or neglect, so staff should also be alert to parent-learner interactions or concerning parental behaviours; this could include parents who are under the influence of drugs or alcohol or if there is a sudden change in their mental health.
- Safeguarding incidents and/or behaviours can be associated with factors outside LINK19 College and / or can occur between learners and / or young people offsite. Vulnerable young adults can be at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and learners can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, and serious youth violence.
- By understanding the indicators of abuse and neglect, we can respond to problems as early as possible and provide the right support and services for the learner and their family.

8. Safeguarding protection procedures

- LINK19 College recognises that some learners have additional or complex needs and may require access to intensive or specialist services to support them.
- LINK19 College adheres to the Kent Safeguarding Children Multi-Agency Partnership Procedures (KSCMP)(Online). The full KSCMP procedures and additional guidance relating to specific safeguarding issues can be found on the KSCMP website www.kscmp.org.uk. In addition, LINK19 College adheres to Kent and Medway Safeguarding Adults Board (KMSAB) procedures.
- LINK19 College recognise that in situations where there are immediate safeguarding concerns identified in line with Support Level Guidance, it is NOT to investigate as a single agency but to act in line with KSCMP and or KMSAB guidance which may involve multi-agency decision making.
- If a learner is in immediate danger or is at risk of harm, a request for support should be made immediately to Adult Social Care and/or the police in line with KSCMP and KMSAB procedures.
- The DSAL may seek advice or guidance from Area Education Safeguarding Adviser from the Education Safeguarding Service or Kent and Medway Safeguarding Adults Board before deciding next steps.
- In the event of a request for support to Adult Social Care being necessary, parents/carers will be informed and consent to this will be sought by the DSAL in line with guidance provided by KSCMP and KMSAB.
 - Parents/carers will be informed unless there is a valid reason not to do so, for example, if to do so would put a child at risk of harm or would undermine a criminal investigation.
- If the DSAL is not immediately available to discuss an urgent concern, staff can seek advice from a Deputy DSAL or the LINK19 College Safeguarding Director, Maddie Arnold-Jones They may also seek advice from the Education Safeguarding Service or via consultation from a social worker or Adult Social Care. If anyone other than the DSAL makes a referral to external services, then they will inform the DSAL as soon as possible.
- The DSAL will keep all early help cases under constant review and consideration will be given to a request for support to Adult Social Care if the situation does not appear to be improving or is getting worse.
- If, after a request for support or any other planned external intervention, a learner's situation does not appear to be improving, the DSAL will consider following [KSCMP and or KMSAB escalation procedures](#) to ensure their concerns have been addressed and, most importantly, that the learner's situation improves. DSALs may request support with this via the Education Safeguarding Service or Adult Social Care.

9. Record keeping

- All safeguarding concerns, discussions and decisions and reasons for those decisions will be recorded in writing on the college safeguarding incident concern form and passed without delay to the DSAL. A body map will be completed if injuries have been observed.
- If members of staff are in any doubt about recording requirements, then they should discuss their concerns with DSAL.
- Records will be completed as soon as possible after the incident / event, using the learner's words and will be signed and dated by the member of staff. If there is an immediate concern the member of staff should consult with a DSAL before completing the form as reporting urgent concerns takes priority.
- Safeguarding/concern forms are kept in the staffroom, college office and shared area on staff network.
- Safeguarding records are kept for individual learners and are maintained separately from all other records relating to the learner in college. Safeguarding records are kept in accordance with data protection legislation and are retained centrally and securely by the DSAL. Safeguarding records are shared with staff on a 'need to know' basis only.
- All safeguarding records will be transferred in accordance with data protection legislation to a learner's subsequent college/setting, under confidential and separate cover. These will be given to the new DSAL and a receipt of delivery will be obtained.
- In addition to the safeguarding file, the DSAL will also consider if it would be appropriate to share any information with the DSAL at the provision in advance of a learner leaving. For example, information that would allow the new college to continue to provide support.
- The Chair of the LINK19 College board of directors and or the director with responsibility for safeguarding will be kept informed of any significant issues by the DSAL.

10. Multi-agency working

- LINK19 College recognises and is committed to its responsibility to work within the KSCMP and KMSAB multi-agency safeguarding arrangements. The leadership team and DSAL will work to establish strong and co-operative local relationships with professionals in other agencies in line with statutory guidance.
- LINK19 College recognises the importance of multi-agency working and is committed to working alongside partner agencies to provide a coordinated safeguarding response. This includes contributing to KSCMP and KMSAB processes as required. Such as, participation in relevant safeguarding multi-agency plans and meetings, including Child Protection Conferences, Core Groups, Strategy Meetings or other multi-agency meetings.

11. Confidentiality and information sharing

- LINK19 College recognises our duty to share relevant information with appropriate agencies in matters relating to safeguarding and learner protection at the earliest opportunity as per statutory guidance outlined within KCSIE.
- All staff must be aware that they cannot promise confidentiality in situations which might compromise a learner's safety or wellbeing.
- The College Lead or DSAL will only disclose information about a learner on a 'need to know' basis.
- All members of staff must be aware that whilst they have duties to keep any information confidential, they also have a professional responsibility to share information with other agencies in order to safeguard learners.
- LINK19 College has a trained Data Protection Officer (DPO) as required by the General Data Protection Regulations (GDPR) to ensure that LINK19 College is compliant with all matters relating to confidentiality and information sharing requirements. LINK19 College has a trained Data Protection Officer (DPO) as required by the General Data Protection Regulations (GDPR) to ensure that LINK19 College is compliant with all matters relating to confidentiality and information sharing requirements. The DPO is Lynsey Hanson at TenIntelligence, Suite 33, 50 Churchhill Square, Kings Hill, West Malling, ME19 4YU. Email address: info@tenintel.com
- The Data Protection Act 2018 and GDPR do not prevent the sharing of information for the purposes of keeping learners safe. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children (KCSIE).
- DfE Guidance on Information Sharing (July 2018) provides further detail.
- If LINK19 College is made aware of any safeguarding concerns which needs to be shared with the wider community (including other local colleges) then advice will be sought from the Education Safeguarding team to ensure that the integrity of any subsequent investigations are maintained and that all members of the community are safeguarded.

12. Complaints

- LINK19 College has a **Complaints Procedure** available to parents, learners, members of staff and visitors who wish to report concerns which is available on request from LINK19 College.
- All reported concerns will be taken seriously and considered within the relevant and appropriate process. Anything that constitutes an allegation against a member of staff or volunteer will be dealt with under the specific **Procedures for Managing Allegations Against Staff policy**.

13. Staff induction, awareness and training

- All members of staff have been provided with access to KCSIE which covers Safeguarding information for all staff.
- College leaders, including the DSAL will read the entire document.
- LINK19 College Directors will read KCSIE Part One.
- All other staff will sign to confirm that they have read and understood KCSIE Part One.
- The DSAL will ensure that all new staff and volunteers including agency, third party and temporary staff receive safeguarding training to ensure they are aware of LINK19 College's internal safeguarding procedures as part of induction.
- All staff members (including agency, third party and temporary staff) will receive appropriate safeguarding training to ensure they are aware of a range of safeguarding issues. This training will include online safety and will take place at least annually.
- In addition to specific safeguarding training, all staff will receive regular safeguarding updates for example, via email, e-bulletins, staff meetings and staff development days at least annually, to provide them with relevant skills and knowledge to safeguard learners effectively.
- Staff will be encouraged to contribute to and shape college safeguarding arrangements through regular safeguarding meetings.
- All members of staff (including agency, third party and temporary staff) will be made aware of LINK19 College's expectations regarding safe and professional practice via the staff code of conduct and Acceptable Use Policy (AUP) which is provided and discussed as part of the induction process.
- The LINK19 College Lead will provide an annual report to the Board of Directors detailing safeguarding training undertaken by all staff and will maintain up to date register of who has been trained.
- Although LINK19 College has a nominated lead for the board of directors (Mrs Maddie Arnold-Jones), all members of the board will access appropriate safeguarding training which covers their specific strategic responsibilities on a regular basis.

14. Safe working practice

- All members of staff are required to work within clear guidelines on Safe Working Practice as outlined in LINK19 College's Code of Conduct.
- Staff will be made aware of LINK19 College's Behaviour Management and Physical Intervention Policies, and any physical interventions / use of reasonable force (Positive Handling) must be in line with agreed policy and procedures and national guidance.

- All staff will be made aware of the professional risks associated with the use of social media and electronic communication (such as email, mobile phones, texting, social network sites etc.) Staff will adhere to relevant college policies including staff code of conduct, online safety and Acceptable Use policies.

15. Staff supervision and support

- Any member of staff affected by issues arising from concerns for learner's welfare or safety can seek support from the DSAL.
- The induction process will include familiarisation with learner protection responsibilities and procedures to be followed if staff have any concerns about a learner's safety or welfare.
- LINK19 College will provide appropriate supervision and support for all members of staff to ensure that:
 - All staff are competent to carry out their responsibilities for safeguarding and promoting the welfare of learners and vulnerable adults
 - All staff are supported by the DSAL in their safeguarding role
 - All members of staff have regular reviews of their own practice to ensure they improve over time.
- The DSAL will also put staff in touch with outside agencies for professional support if they so wish. Staff can also approach organisations such as their Union, the Education Support Partnership or other similar organisations directly.

16. Safer recruitment

- LINK19 College is committed to ensure that a safe culture is developed and that all steps are taken to recruit staff and volunteers who are safe to work with our learners/students and staff.
- LINK19 College will follow KCSIE (Section 3 'Safer Recruitment') and guidance from The Disclosure and Barring Service (DBS).
- LINK19 College Directors are responsible for ensuring that the college follows safe recruitment processes outlined within guidance.
- LINK19 College maintains an accurate Single Central Record (SCR) in line with statutory guidance.
- LINK19 College Directors will ensure that there is at least one of the persons who conducts an interview has completed Safer Recruitment Training.
- We advise all staff to disclose any reason that may affect their suitability to work with learners including convictions, cautions, court orders, reprimands and warnings.

- We will ensure that all staff and volunteers have read the staff code of conduct and staff handbook and understand that their behavior and practice must be in line with it.

17. Allegations against members of staff and volunteers

- LINK19 College recognises that it is possible for any member of staff, including volunteers, directors, contractors, agency and third-party staff (including supply teachers) and visitors to behave in a way that:
 - Indicates they have harmed a learner, or may have harmed a learner;
 - Means they have committed a criminal offence against or related to a learner;
 - behaved towards a learner in a way that indicates they may pose a risk of harm; or
 - behaved or may have behaved in a way that indicates they may not be suitable to work with children or vulnerable young adults.
- LINK19 College has a Managing Allegations Against Staff Policy
- All staff and volunteers should feel able to raise concerns about poor or unsafe practice potential failures in the college safeguarding regime. The leadership team will take all concerns or allegations received seriously
- Allegations should be referred immediately to the LINK19 College Lead who will contact the [Local Authority Designated Officer](#) (LADO) to agree further action to be taken in respect of the learner and staff member.
- In the event of allegations of abuse being made against the LINK19 College Lead, staff are advised that allegations should be reported to the Chair of the LINK19 College board who will contact the LADO.
- All staff and volunteers should feel able to raise concerns about poor or unsafe practice and such concerns will always be taken seriously by the leadership team.
- All members of staff are made aware of LINK19 College's whistle-blowing procedure. It is a disciplinary offence not to report concerns about the conduct of a colleague that could place a learner at risk.
- LINK19 College has a legal duty to refer to the Disclosure and Barring Service (DBS) anyone who has harmed, or poses a risk of harm, to a learner, or if there is reason to believe the member of staff has committed one of a number of listed offences, and who has been removed from working (paid or unpaid) in regulated activity, or would have been removed had they not left. The DBS will consider whether to bar the person.
 - If these circumstances arise in relation to a member of staff at our college, a referral will be made as soon as possible after the resignation or removal of the individual in accordance with advice from the LADO and/or Schools Personnel Service.

When in doubt – consult

18. Safeguarding learners with Special Educational Needs and Disabilities

- LINK19 College acknowledges that learners with special educational needs (SEN) and disabilities can face additional safeguarding challenges as they may have an impaired capacity to resist or avoid abuse. They may have speech, language and communication needs which may make it difficult to tell others what is happening.
- LINK19 College will ensure that learners with SEN and disabilities, specifically those with communication difficulties will be supported to ensure that they can be understood and concerns acted upon.
- Members of staff are encouraged to be aware that learners with SEN and disabilities can be disproportionately impacted by safeguarding concerns such as bullying and exploitation.
- All members of staff will be encouraged to appropriately explore possible indicators of abuse such as behaviour/mood change or injuries and not to assume that they are related to the learner's disability and be aware that learners with SEN and disabilities may not always outwardly display indicators of abuse. To address these additional challenges, we will always consider extra pastoral support for learners with SEN and disabilities.

19. Peer on Peer Abuse

- All members of staff at LINK19 College recognise that learners are capable of abusing their peers. LINK19 College believes that abuse is abuse and it will never be tolerated. All victims will be taken seriously and offered appropriate support, regardless of where the abuse takes place.
- LINK19 College recognises that peer on peer abuse can take many forms, including (but not limited to):
 - Bullying (including cyberbullying)
 - physical abuse which can include hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm
 - sexual violence and sexual harassment
 - 'upskirting', which typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm
 - sexting (also known as youth produced sexual imagery)
 - initiation/hazing type violence and rituals.
- LINK19 College recognises youth produced sexual imagery (also known as 'sexting') as a safeguarding issue; all concerns will be reported to and dealt with by the DSAL (or deputy).
 - We will follow the advice as set out in the non-statutory UKCIS guidance: ['Sexting in schools and colleges: responding to incidents and safeguarding young people'](#) and the local [KSCMP](#) guidance: "Responding to youth produced sexual imagery".

- When responding to concerns relating to child on child sexual violence or harassment, LINK19 College will follow guidance outlined in part five of KCSIE and [‘Sexual Violence and Sexual Harassment Between Children in Schools and Colleges’](#).
- Staff and leadership are mindful that some peer-on-peer abuse issues may be affected by gender, age, ability and culture of those involved.
- All allegations of peer-on-peer abuse will be recorded, investigated, and dealt with in line with associated school policies, including safeguarding, anti-bullying and behaviour.
- Alleged victims, perpetrators and any other child or learner affected by peer-on-peer abuse will be supported with pastoral support and by working with parents / carers, and in cases of sexual assault, informing the police and Adult Social Care.

20. Gangs, County Lines, Violent Crime and Exploitation

- [LINK19 College](#) recognises the impact of gangs, county lines, serious violence, crime and exploitation. It is recognised that the initial response to child victims is important and that staff will take any allegation seriously and work in ways that support children and keep them safe.
- All staff have been trained and recognise the need to be vigilant for the signs that may include, but not exclusively:
 - Unexplained gifts/new possessions – these can indicate learners have been approached by/involved with individuals associated with criminal networks/gangs.
 - Learners who go missing for periods of time or regularly come home late
 - Learners who regularly miss school or education or do not take part in education
 - Change in friendships/relationships with others/groups.
 - Learners who associate with other young people involved in exploitation
 - Learners who suffer from changes in emotional well-being
 - Significant decline in performance.
 - Signs of self-harm/significant change in wellbeing.
 - Signs of assault/unexplained injuries.

21. Mental Health

- All staff will be made aware that mental health problems can, in some cases, be an indicator that a learner has suffered or is at risk of suffering abuse, neglect or exploitation. Staff are aware of how learner’s experiences, can impact on their mental health, behaviour and education.
- Staff are well placed to observe learners 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.
- If staff have a mental health concern about a learner that is also a safeguarding concern, immediate action should be taken by speaking to the DSAL or a deputy.

22. Online safety

- It is recognised by LINK19 College that the use of technology presents challenges and risks to learners and adults both inside and outside of college.
- LINK19 College will empower, protect and educate the community in their use of technology and establish mechanisms to identify, intervene in, and escalate any incident where appropriate.
- LINK19 College identifies that the breadth of issues classified within online safety is considerable, but can be categorised into three areas of risk:
 - content: being exposed to illegal, inappropriate or harmful material; for example, pornography, fake news, racist or radical and extremist views;
 - contact: being subjected to harmful online interaction with other users; for example, commercial advertising as well as adults posing as children or young adults; and
 - conduct: personal online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images, or online bullying.
- The DSAL has overall responsibility for online safeguarding within LINK19 College but will liaise as necessary with other members of staff.
- LINK19 College uses a wide range of technology. This includes computers, laptops, tablets and other digital devices, the internet, our learning platform and email systems.
 - All college owned devices and systems will be used in accordance with our acceptable use policies and with appropriate safety and security measures in place.
- LINK19 College recognises the specific risks that can be posed by mobile technology, including mobile phones and cameras. In accordance with KCSIE appropriate policies are in place that are shared and understood by all members of the LINK19 College community.
 - Further information regarding the specific approaches relating to this can be found in the colleges Online Safety Policy, Acceptable Use Policy and Photographic Image Use Policy which can be found in the main college office.
- LINK19 College will do all we reasonably can to limit learners' exposure to online risks through our IT systems and will ensure that appropriate filtering and monitoring systems are in place.
 - Website filtering and screening is covered by Forti Gate Web Filtering Systems and Zulu Desk to enforce tablet restrictions.
 - If learners or staff discover unsuitable sites or material, they are required to turn off the screen / monitor, report the concern immediately to the DSAL and report the URL of the site to the DSAL. The breach will be recorded and escalated as appropriate. Parents/carers will be informed of filtering breaches involving learners. Any material that LINK19 College believes is illegal will be reported immediately to the appropriate agencies, such as: IWF, Kent Police or CEOP.

- All users will be informed that use of our systems can be monitored, and that monitoring will be in line with data protection, human rights and privacy legislation.
 - Filtering breaches or concerns identified through our monitoring approaches will be recorded and reported to the DSAL, College Lead and IT support staff, as appropriate.
 - Any access to material believed to be illegal will be reported immediately to the appropriate agencies, such as the [Internet Watch Foundation](#) and the police.
 - When implementing appropriate filtering and monitoring, LINK19 College will ensure that over blocking does not lead to unreasonable restrictions as to what learners can be taught with regards to online teaching and safeguarding.
- LINK19 College acknowledges that whilst filtering and monitoring is an important part of colleges online safety responsibilities, it is only one part of our approach to online safety.
 - Learners will use appropriate search tools, apps and online resources as identified following an informed risk assessment.
 - Learners internet use will be supervised by staff according to their age and ability.
 - Learners will be directed to use age-appropriate online resources and tools by staff.
 - Learners may have access to systems external to LINK19 College's control such as mobile phones and other internet enabled devices and technology and where concerns are identified appropriate action will be taken.
 - LINK19 College will ensure a comprehensive whole college curriculum response is in place to enable all learners to learn about and manage online risks effectively as part of providing a broad and balanced curriculum.
 - LINK19 College will build a partnership approach to online safety and will support parents / carers to become aware and alert by providing information on the LINK19 College website and within newsletters.
 - LINK19 College will ensure that online safety training for all staff is integrated, aligned and considered as part of our overarching safeguarding approach.
 - The DSAL will respond to online safety concerns in line with the safeguarding and child protection and other associated policies such as online safety, anti-bullying and behaviour.
 - Internal sanctions and/or support will be implemented as appropriate.
 - Where necessary, concerns will be escalated and reported to relevant partner agencies in line with local policies and procedures.

Where learners are asked to learn online at home in response to a full or partial closure:

- LINK19 College will ensure any remote sharing of information, communication and use of online learning tools and systems will be in line with privacy and data protection requirements.

- All communication with learners and parents/carers will take place using college provided or approved communication channels; for example, college provided email accounts and phone numbers and/or agreed systems e.g., Microsoft Teams, Skype for Business or equivalent.
 - Any pre-existing relationships or situations which mean this cannot be complied with will be discussed with the DSAL.
- Staff and learners will engage with remote teaching and learning in line with existing behaviour principles as set out in our college behavior and wellbeing policy / code of conduct and acceptable use policies.
- Staff and learners will be encouraged to report issues experienced at home and concerns will be responded to in line with safeguarding and other relevant policies.
- When delivering remote learning, staff will follow our Remote Learning Acceptable Use Policy (AUP).
- Parents /carers will be made aware of what their Young person is being asked to do online, including the sites they will be asked to access. LINK19 College will continue to be clear who from the school their Young Person is going to be interacting with online.
- Parents/carers will be encouraged to ensure learners are appropriately supervised online and that appropriate parent controls are implemented at home.

23. Curriculum and staying safe

- LINK19 College will ensure that learners are taught about safeguarding, including online safety, as part of providing a broad and balanced curriculum.
- We recognise that colleges play an essential role in helping learners to understand and identify the parameters of what is appropriate learner and adult behaviour; what is 'safe'; to recognise when they and others close to them are not safe; and how to seek advice and support when they are concerned.
- Our curriculum provides opportunities for increasing self-awareness, self-esteem, social and emotional understanding, assertiveness and decision making so that learners have a range of age-appropriate contacts and strategies to ensure their own protection and that of others.
- LINK19 College is aware of the most recent communication from the DfE on the mandatory implementation of Relationships Education, Relationships and Sex and Health Education and will ensure that this is embedded into the curriculum.
- Our systems support learners to talk to a range of staff. Learners will be listened to and heard and their concerns will be taken seriously and acted upon as appropriate.

24. Safeguarding in the Workplace

In alignment with our commitment to ensuring a safe and supportive learning environment for all our learners, LINK19 College recognises the importance of safeguarding during work placements for those with specialist educational needs. As part of this commitment, an initial assessment will be made of work placement settings. Learners embarking on work placements will be accompanied by a dedicated work placement supervisor with appropriate safeguarding training. Our collaborative approach involves an initial learner induction with employers and organisations, during which crucial information is provided, including LINK19 College's safeguarding policy and the identity of the Designated Safeguarding Adult Lead at the college and the confirmed expectation that learners will be safeguarded on placement. Learners and Work Placement Supervisors are informed about the procedures to contact the Designated Safeguarding Adult Lead promptly in case of any concerns, thereby reinforcing our proactive stance in safeguarding the welfare of our learners in real-world educational settings.

25. The use of LINK19 College premises by other organisations

- Where services or activities are provided separately by another body using LINK19 College's premises, the LINK19 College Lead and Board of Directors will seek written assurance that the organisation concerned has appropriate policies and procedures in place with regard to safeguarding learners and learner protection and that relevant safeguarding checks have been made in respect of staff and volunteers.
- If this assurance is not achieved, then an application to use premises will be refused.

26. Security

- All members of staff have a responsibility for maintaining awareness of buildings and grounds security and for reporting concerns that may come to light.
- Appropriate checks will be undertaken in respect of visitors and volunteers coming into LINK19 College as outlined within guidance. Visitors will be expected to sign in and out via the LINK19 College office visitors log and to display a visitor's badge whilst on college site.
- Any individual who is not known or identifiable on site should be challenged for clarification and reassurance.
- LINK19 College will not accept the behaviour of any individual (parent or other) that threatens college security or leads others to feel unsafe. Such behaviour will be treated as a serious concern and may result in a decision to refuse access for that individual to the LINK19 College site.

27. Local support

- All members of staff in LINK19 College are made aware of local support available
 - **Contact details for Area Safeguarding Adviser (Education Safeguarding Team)**
 - www.kelsi.org.uk/support-for-children-and-young-people/child-protection-and-safeguarding/safeguarding-contacts
 - Gravesham area office: 03000 412445
 - **Contact details for Online Safety in the Education Safeguarding Team**
 - Rebecca Avery, Education Safeguarding Adviser (Online Protection):
 - Ashley Assiter, E-Safety Development Officer
 - 03000 415797
 - esafetyofficer@theeducationpeople.org (non-urgent issues only)
 - **Contact details for the LADO**
 - Telephone: 03000 410888
 - Email: kentchildrenslado@kent.gov.uk
 - **Adult Social Work Services**
 - Telephone: 03000 416161
 - Email: social.services@kent.gov.uk
 - **Kent Police**
 - 101 (or 999 if there is an immediate risk of harm)
 - **Kent Prevent Education Officer**
 - 03000 413439
 - **Kent Safeguarding Children Multi-agency Partnership**
 - kscmp@kent.gov.uk
 - 03000 421126
 - **Kent Adult Safeguarding (KAS)**
 - New Cases
 - AdultsSafeguardingCRU@Kent.gov.uk
 - 03000 416161
 - Young Peoples Team
 - DGSSYoungPeoplesTeam@kent.gov.uk
 - 03000 413232

LINK19 College is committed to achieving Best Value in all decisions made. We use the principles of Best Value as they apply to securing continuous improvement.

SINGLE EQUALITIES SCHEME IMPACT ASSESSMENT

This policy has been developed to ensure that there is no negative or adverse impact on any individual or group in terms of disability, race, belief, gender, sexual orientation or age. All opportunities for potential positive impact on individuals, groups and the community are embedded within the ethos, vision and values of the college.

Reviewed Date: Autumn 2024

Review Date: Autumn 2025

Signed by Chair of Board:.....

Signed by LINK19 College Lead:.....

Appendix 1: What school and college staff should look out for

(See Keeping Children Safe in Education 2024 – Part One)

What school and college staff should look out for

Early help

18. 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 or has certain health conditions and has specific additional needs
- has special educational needs (whether or not they have a statutory Education, Health and Care plan)
- has a mental health need
- 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 or county lines
- is frequently missing/goes missing from education, home or care,
- has experienced multiple suspensions, is at risk of being permanently excluded from schools, colleges and in Alternative Provision or a Pupil Referral Unit.
- is at risk of modern slavery, trafficking, sexual and/or criminal exploitation
- is at risk of being radicalised or exploited
- has a parent or carer in custody, or is affected by parental offending
- 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 alcohol and other drugs themselves
- is at risk of so-called 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage
- is a privately fostered child.

Abuse, neglect and exploitation

19. All staff should be aware of the indicators of abuse, neglect and exploitation (see below), understanding that children can be at risk of harm inside and outside of the school/college, inside and outside of home, and online. Exercising professional curiosity and knowing what to look for is vital for the early identification of abuse and neglect so that staff are able to identify cases of children who may be in need of help or protection.

20. All school and college staff should be aware that abuse, neglect, exploitation, and safeguarding issues are rarely standalone events and cannot be covered by one definition or one label alone. In most cases, multiple issues will overlap.

21. All staff, but especially the designated safeguarding lead (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 abuse (including harassment and exploitation), domestic abuse in their own intimate relationships (teenage relationship abuse), criminal exploitation, serious youth violence, county lines and radicalisation.

22. All staff should be aware that technology is a significant component in many safeguarding and wellbeing issues. Children are at risk of abuse and other risks online as well as face to face. In many cases abuse and other risks will take place concurrently both online and offline. Children can also abuse other children online, this can take the form of abusive, harassing, and misogynistic/misandrist messages, the non-consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography to those who do not want to receive such content.

23. In all cases, if staff are unsure, they should always speak to the designated safeguarding lead or a deputy.

Indicators of abuse and neglect

24. 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. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects. 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

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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.

25. 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.

26. 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 illtreatment 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.

27. 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 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 and all staff should be aware of it and of their school or college's policy and procedures for dealing with it.

28. 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 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.

Safeguarding issues

29. All staff should have an awareness of safeguarding issues that can put children at risk of harm. Behaviours linked to issues such as drug taking and/or alcohol misuse, unexplainable and/or persistent absences from education, serious violence (including that linked to county lines), radicalisation and consensual and non-consensual sharing of nude and semi-nude images and/or videos.

8 can be

signs that children are at risk. Below are some safeguarding issues all staff should be aware of.

Additional information on these safeguarding issues and information on other safeguarding issues is included in Annex B.

Child-on-child abuse

30. All staff should be aware that children can abuse other children (often referred to as child-on-child abuse), and that it can happen both inside and outside of school or college and online. All staff should be clear as to the school or college's policy and procedures with regard 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.

31. 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 abuse is not being reported. As such it is important that when staff have any concerns regarding child-on-child abuse they should speak to their designated safeguarding

lead (or a deputy).

32. It is essential that all staff understand the importance of challenging inappropriate behaviours between children that are abusive in nature. Examples of which are listed below. 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.

33. Child-on-child abuse is most likely to include, but may not be limited to:

- bullying (including cyberbullying, prejudice-based and discriminatory bullying)
- abuse in intimate personal relationships between children (sometimes known as ‘teenage relationship abuse’)
- 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 violence⁹ 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^{9F}

10 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 nude and semi-nude images and/or videos¹¹ (also known as sexting or youth produced sexual imagery)
- upskirting¹² 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).

Child criminal exploitation (CCE) and child sexual exploitation (CSE)

34. Both CCE and CSE 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 criminal or sexual activity. It may involve an 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. CCE and CSE 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 criminal exploitation (CCE)¹³

35. 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.

36. 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.

37. 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.

Child sexual exploitation (CSE)

38. 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 nonpenetrative 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.

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

40. 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 do not realise they are being exploited and may believe they are in a genuine romantic relationship.

Domestic abuse

41. Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional. Children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn.

Female genital mutilation (FGM)

42. Whilst all staff should speak to the designated safeguarding lead (or a

deputy) with regard to any concerns about female genital mutilation (FGM), there is a specific legal duty on teachers.

14 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. See page 160 for further information.

Mental health

43. 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.

44. 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. 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.

45. If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken to follow their school or college's child protection policy and by speaking to the designated safeguarding lead or a deputy.
Serious violence

46. 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 or college, a change in friendships or relationships with older individuals or groups, a significant decline in educational performance, signs of selfharm 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.
Additional information and support

47. Departmental advice What to do if you're 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 that 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.

48. Annex B contains important additional information about specific forms of abuse, exploitation and safeguarding issues. School and college leaders and those staff who work directly with children should read Annex B.

Appendix 2

Categories of Abuse

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

Abuse: a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. They may be abused by an adult or adults or another child or children. It should be noted that abuse can be carried out both on and offline and be perpetrated by men, women and children.

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

Signs that MAY INDICATE Sexual Abuse

- Sudden changes in behaviour and college performance
- Displays of affection which are sexual and age inappropriate
- Self-harm, self-mutilation or attempts at suicide
- Alluding to secrets which they cannot reveal
- Tendency to cling or need constant reassurance
- Regression to younger behaviour for example thumb sucking, playing with discarded toys, acting like a baby
- Distrust of familiar adults e.g. anxiety of being left with relatives, a child minder or lodger
- Unexplained gifts or money
- Depression and withdrawal
- Fear of undressing for PE
- Sexually transmitted disease
- Fire setting

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.

Signs that MAY INDICATE physical abuse

- Bruises and abrasions around the face
- Damage or injury around the mouth
- Bi-lateral injuries such as two bruised eyes
- Bruising to soft area of the face such as the cheeks
- Fingertip bruising to the front or back of torso
- Bite marks
- Burns or scalds (unusual patterns and spread of injuries)
- Deep contact burns such as cigarette burns
- Injuries suggesting beatings (strap marks, welts)
- Covering arms and legs even when hot

- Aggressive behaviour or severe temper outbursts.
- Injuries need to be accounted for. Inadequate, inconsistent or excessively plausible explanations or a delay in seeking treatment should signal concern.

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

Signs that MAY INDICATE emotional abuse

- Over reaction to mistakes
- Lack of self-confidence/esteem
- Sudden speech disorders
- Self-harming
- Eating Disorders
- Extremes of passivity and/or aggression
- Compulsive stealing
- Drug, alcohol, solvent abuse
- Fear of parents being contacted
- Unwillingness or inability to play
- Excessive need for approval, attention and affection

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

Signs that MAY INDICATE neglect.

- Constant hunger
- Poor personal hygiene
- Constant tiredness
- Inadequate clothing
- Frequent lateness or non-attendance at college
- Untreated medical problems
- Poor relationship with peers
- Compulsive stealing and scavenging
- Rocking, hair twisting and thumb sucking
- Running away
- Loss of weight or being constantly underweight
- Low self esteem

Appendix 3

Other forms of abuse specific to vulnerable adults

Discriminatory: including that based on a person's ethnic origin, religion, language, age, sexuality, gender, disability and other forms of harassment, slurs or similar treatment.

Signs that MAY INDICATE discrimination

- Lack of respect shown to an individual
- Failure to respect dietary needs
- Failure to respect cultural and religious needs
- Signs of substandard services offered to an individual
- Exclusion from rights and services afforded to citizens e.g. health, education, employment, criminal justice and civic status

Psychological: including emotional abuse, threats of harm or abandonment, deprivation of contact or communication, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, isolation or withdrawal from services or supportive networks.

Signs that MAY INDICATE psychological abuse

- Change in appetite
- Low self-esteem, deference, positivity and resignation
- Unexplained fear, defensiveness, ambivalence
- Emotional withdrawal
- Person managing care uses bullying, intimidation or threats to reduce desired behaviour
- Person managing care has punitive approach to bodily functions or incontinence.

Financial or material abuse: including theft, fraud, exploitation, pressure in connection with wills, property or inheritance or financial transactions, or the misuse or misappropriation of property, possessions or benefits.

Signs that MAY INDICATE financial or material abuse

- Recent acquaintances expressing sudden or disproportionate affection for a person with money or property
- Lack of records and accounting of where money is spent
- Power of attorney or enduring power of attorney obtained when a person is unable to comprehend and give consent
- Withholding money
- Unusual interest shown by family or others in the person's assets
- Person managing financial affairs is evasive or uncooperative
- Selling or offering to sell possessions of a vulnerable adult who does not have the capacity to consent or know the full value of those possessions.

Institutional: indicated by repeated instances of unsatisfactory professional practice, pervasive ill treatment or gross misconduct indicating an abusive climate.

Signs that MAY INDICATE institutional abuse

- Inappropriate or poor care
- Misuse of medication

- Inappropriate restraint
- Sensory deprivation e.g. denial of use of hearing aid
- Lack of recording on client files
- Lack of respect shown to person
- Denial of visitors or phone calls
- Restricted access to toilet or bathing facilities
- Restricted access to appropriate privacy or personal dignity
- Lack of flexibility and choice
- Lack of personal clothing and possessions
- Lack of privacy
- Lack of adequate procedures e.g. medication
- Controlling relationships between staff and learners
- Poor professional practice
- lack of response to complaints

Appendix 4: National Support Organisations

Support for staff

- Education Support Partnership: www.educationsupportpartnership.org.uk
- Professional Online Safety Helpline: www.saferinternet.org.uk/helpline

Support for learners

- NSPCC: www.nspcc.org.uk
- ChildLine: www.childline.org.uk
- Papyrus: www.papyrus-uk.org
- The Mix: www.themix.org.uk
- Shout: <https://giveusashout.org.org>
- Fearless: <https://crimestoppers-uk.org/fearless>

Support for adults

- Family Lives: www.familylives.org.uk
- Crime Stoppers: www.crimestoppers-uk.org
- Victim Support: www.victimsupport.org.uk
- The Samaritans: www.samaritans.org
- NAPAC (National Association for People Abused in Childhood): napac.org.uk
- Action Fraud: www.actionfraud.police.uk
- Shout: <https://giveusashout.org.org>

Support for Learning Disabilities

- Respond: www.respond.org.uk
- Mencap: www.mencap.org.uk

Domestic Abuse

- Refuge: www.refuge.org.uk
- Women's Aid: www.womensaid.org.uk
- Men's Advice Line: www.mensadvice.org.uk
- Mankind: www.mankindcounselling.org.uk
- Domestic abuse services: www.domesticabuseservices.org.uk
- National Domestic Abuse Helpline: www.nationaldahelpline.org.uk
- Respect Phoneline: www.respectphoneline.org.uk

Honour based Abuse

- Forced Marriage Unit: <https://www.gov.uk/guidance/forced-marriage>
- FGM Factsheet:
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/496415/6_1639_HO_SP_FGM_mandatory_reporting_Fact_sheet_Web.pdf
- Mandatory reporting of female genital mutilation: procedural information:
www.gov.uk/government/publications/mandatory-reporting-of-female-genital-mutilation-procedural-information

Contextual Safeguarding, Peer on Peer abuse, Sexual Exploitation and Criminal Exploitation:

- Contextual Safeguarding Network: <https://contextualsafeguarding.org.uk>
- National Crime Agency: www.nationalcrimeagency.gov.uk/who-we-are
- Rape Crisis: <https://rapecrisis.org.uk>
- Lucy Faithfull Foundation: www.lucyfaithfull.org.uk
- Brook: www.brook.org.uk
- Victim Support: www.victimsupport.org.uk
- Anti-Bullying Alliance: www.anti-bullyingalliance.org.uk
- Disrespect Nobody: www.disrespectnobody.co.uk
- Upskirting – know your rights: www.gov.uk/government/news/upskirting-know-https://www.gov.uk/government/news/upskirting-know-your-rightsyour-rights

Substance Misuse

- We are with you (formerly Addaction): www.wearewithyou.org.uk/services/kent-for-young-people/
- Talk to Frank: www.talktofrank.com

Mental Health

- Mind: www.mind.org.uk
- Moodspark: <https://moodspark.org.uk>
- Young Minds: <https://www.youngminds.org.uk/>
- We are with you (formerly Addaction): www.wearewithyou.org.uk/services/kent-for-young-people/

Online Safety

- CEOP: www.ceop.police.uk
- Internet Watch Foundation (IWF): www.iwf.org.uk
- Think U Know: www.thinkuknow.co.uk
- Childnet International: www.childnet.com
- UK Safer Internet Centre: www.saferinternet.org.uk
- Report Harmful Content: <https://reportharmfulcontent.com>
- Parents Info: www.parentinfo.org
- Marie Collins Foundation: www.mariecollinsfoundation.org.uk
- Internet Matters: www.internetmatters.org
- NSPCC / Net Aware: www.nspcc.org.uk/onlinesafety and www.net-aware.org.uk
- Get safe Online: www.getsafeonline.org
- Stop it Now!: www.stopitnow.org.uk

Radicalisation and hate

- Educate against Hate: www.educateagainsthate.com
- Counter Terrorism Internet Referral Unit: www.gov.uk/report-terrorism
- True Vision: www.report-it.org.uk

Appendix 5: Further Safeguarding Information (See Annex B of Keeping Children Safe in Education 2024)

Child abduction and community safety incidents

Child abduction and community safety incidents

Child abduction is the unauthorised removal or retention of a minor from a parent or anyone with legal responsibility for the child. Child abduction can be committed by parents or other family members; by people known but not related to the victim (such as neighbours, friends and acquaintances); and by strangers.

Other community safety incidents in the vicinity of a school can raise concerns amongst children and parents, for example, people loitering nearby or unknown adults engaging children in conversation.

As children get older and are granted more independence (for example, as they start walking to school on their own) it is important they are given practical advice on how to keep themselves safe. Many schools provide outdoor-safety lessons run by teachers or by local police staff.

It is important that lessons focus on building children's confidence and abilities rather than simply warning them about all strangers. Further information is available at: www.actionagainstabduction.org and www.clevernevergoes.org.

Child criminal exploitation (CCE) and child sexual exploitation (CSE)

We know that different forms of harm often overlap, and that perpetrators may subject children and young people to multiple forms of abuse, such as criminal exploitation (including county lines) and sexual exploitation.

In some cases, the exploitation or abuse will be in exchange for something the victim needs or wants (for example, money, gifts or affection), and/or will be to the financial benefit or other advantage, such as increased status, of the perpetrator or facilitator. Children can be exploited by adult males or females, as individuals or groups. They may also be exploited by other children, who themselves may be experiencing exploitation – where this is the case, it is important that the child perpetrator is also recognised as a victim.

Whilst the age of the child may be a contributing factor for an imbalance of power, there are a range of other factors that could make a child more vulnerable to exploitation, including, sexual identity, cognitive ability, learning difficulties, communication ability, physical strength, status, and access to economic or other resources.

Some of the following can be indicators of both child criminal and sexual exploitation where children:

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

Children who have been exploited will need additional support to help keep them in education.

Child Sexual Exploitation (CSE) can be a one-off occurrence or a series of incidents over

time and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence.

Some additional specific indicators that may be present in CSE are children who:

- have older boyfriends or girlfriends; and
- suffer from sexually transmitted infections, display sexual behaviours beyond expected sexual development or become pregnant.

Further information on signs of a child's involvement in sexual exploitation is available in Home Office guidance: Child sexual exploitation: guide for practitioners

County lines

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs using dedicated mobile phone lines or other form of "deal line". This activity can happen locally as well as across the UK - no specified distance of travel is required. Children and vulnerable adults are exploited to move, store and sell drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims.

Children can be targeted and recruited into county lines in a number of locations including any type of schools (including special schools), further and higher educational institutions, pupil referral units, children's homes and care homes.

Children are also increasingly being targeted and recruited online using social media. Children can easily become trapped by this type of exploitation as county lines gangs can manufacture drug debts which need to be worked off or threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

A number of the indicators for CCE and CSE as detailed above may be applicable to where children are involved in county lines. Some additional specific indicators that may be present where a child is criminally exploited through involvement in county lines are children who:

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

Further information on the signs of a child's involvement in county lines is available in guidance published by the Home Office and The Children's Society County Lines Toolkit For Professionals .

Children and the court system

Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. There are two age appropriate guides to support children 5-11-year olds and 12-17 year olds.

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

Making child arrangements via the family courts following separation can be stressful and entrench conflict in families. This can be stressful for children. The Ministry of Justice has launched an online child arrangements information tool with clear and concise information on the dispute resolution service. This may be useful for some parents and carers.

Children who are absent from education

All staff should be aware that children being absent from school or college, particularly repeatedly and/or for prolonged periods, and children missing education can act as a vital warning sign of a range of safeguarding possibilities. This may include abuse and neglect such as sexual abuse or exploitation and can also be a sign of child criminal exploitation including involvement in county lines. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation, so-called 'honour'-based abuse or risk of forced marriage. Early intervention is essential to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child going missing in future. It is important that staff are aware of their school or college's unauthorised absence procedures and children missing education procedures.

Children with family members in prison

Approximately 200,000 children in England and Wales have a parent sent to prison each year. These children are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. The National Information Centre on Children of Offenders, NICCO provides information designed to support professionals working with offenders and their children, to help mitigate negative consequences for those children.

Cybercrime

Cybercrime is criminal activity committed using computers and/or the internet. It is broadly categorised as either 'cyber-enabled' (crimes that can happen off-line but are enabled at scale and at speed on-line) or 'cyber dependent' (crimes that can be committed only by using a computer). Cyber-dependent crimes include:

- unauthorised access to computers (illegal 'hacking'), for example accessing a school's computer network to look for test paper answers or change grades awarded
- 'Denial of Service' (Dos or DDoS) attacks or 'booting'. These are attempts to make a computer, network or website unavailable by overwhelming it with internet traffic from multiple sources, and,
- making, supplying or obtaining malware (malicious software) such as viruses, spyware, ransomware, botnets and Remote Access Trojans with the intent to commit further offence, including those above.

Children with particular skills and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime.

If there are concerns about a child in this area, the designated safeguarding lead (or a deputy), should consider referring into the Cyber Choices programme. This is a nationwide police programme supported by the Home Office and led by the National Crime Agency, working with regional and local policing. It aims to intervene where young people are at risk of committing, or being drawn into, low-level cyber-dependent offences and divert them to a more positive use of their skills and interests.

Note that Cyber Choices does not currently cover 'cyber-enabled' crime such as fraud, purchasing of illegal drugs on-line and child sexual abuse and exploitation, nor other areas of concern such as on-line bullying or general on-line safety.

Additional advice can be found at: Cyber Choices, 'NPCC- When to call the Police' and

Domestic abuse

The Domestic Abuse Act 2021 received Royal Assent on 29 April 2021. The Act introduced the first ever statutory definition of domestic abuse and recognises the impact of domestic abuse on children, as victims in their own right, if they see, hear or experience the effects of abuse. The statutory definition of domestic abuse, based on the previous cross-government definition, ensures that different types of relationships are captured, including ex-partners and family members. The definition captures a range of different abusive behaviours, including physical, emotional and economic abuse and coercive and controlling behaviour. Under the statutory definition, both the person who is carrying out the behaviour and the person to whom the behaviour is directed towards must be aged 16 or over and they must be “personally connected” (as defined in section 2 of the 2021 Act).

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child to parent abuse. Anyone can be a victim of domestic abuse, regardless of sexual identity, age, ethnicity, socio-economic status, sexuality or background and domestic abuse can take place inside or outside of the home. The government has issued statutory guidance to provide further information for those working with domestic abuse victims and perpetrators, including the impact on children.

All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Experiencing domestic abuse can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Young people can also experience domestic abuse within their own intimate relationships. This form of child-on-child abuse is sometimes referred to as ‘teenage relationship abuse’. Depending on the age of the young people, this may not be recognised in law under the statutory definition of ‘domestic abuse’ (if one or both parties are under 16). However, as with any child under 18, where there are concerns about safety or welfare, child safeguarding procedures should be followed and both young victims and young perpetrators should be offered support.

Operation Encompass

Operation Encompass operates in all police forces across England. It helps police and schools work together to provide emotional and practical help to children. The system ensures that when the police are called to an incident of domestic abuse, where there are children in the household who have experienced the domestic incident, the police will inform the key adult (usually the designated safeguarding lead (or a deputy)) in school before the child or children arrive at school the following day. This ensures that the school has up to date relevant information about the child’s circumstances and can enable immediate support to be put in place, according to the child’s needs. Operation Encompass does not replace statutory safeguarding procedures. Where appropriate, the police and/or schools should make a referral to local authority children’s social care if they are concerned about a child’s welfare. More information about the scheme and how schools can become involved is available on the Operation Encompass website.

Operation Encompass provides an advice and helpline service for all staff members from educational settings who may be concerned about children who have experienced domestic abuse. The helpline is available 8:00 to 13:00, Monday to Friday on 0204 513 9990 (charged at local rate).

National Domestic Abuse Helpline

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

Additional advice on identifying children who are affected by domestic abuse and how they can be helped is available at:

- NSPCC- UK domestic-abuse Signs Symptoms Effects
- Refuge what is domestic violence/effects of domestic violence on children
- Safe Young Lives: Young people and domestic abuse | Safelives
- Domestic abuse: specialist sources of support (includes information for adult victims, young people facing abuse in their own relationships and parents experiencing child to parent violence/abuse)
- Home : Operation Encompass (includes information for schools on the impact of domestic abuse on children)

Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The designated safeguarding lead (and any deputies) should be aware of contact details and referral routes into the Local Housing Authority so they can raise/progress concerns at the earliest opportunity. Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property. Whilst referrals and/or discussion with the Local Housing Authority should be progressed as appropriate, and in accordance with local procedures, this does not, and should not, replace a referral into local authority children's social care where a child has been harmed or is at risk of harm. The Homelessness Reduction Act 2017 places a new legal duty on English councils so that everyone who is homeless or at risk of homelessness will have access to meaningful help including an assessment of their needs and circumstances, the development of a personalised housing plan, and work to help them retain their accommodation or find a new place to live. The following factsheets usefully summarise the new duties: Homeless Reduction Act Factsheets. The new duties shift the focus to early intervention and encourages those at risk to seek support as soon as possible, before they are facing a homelessness crisis.

In most cases school and college staff will be considering homelessness in the context of children who live with their families, and intervention will be on that basis. However, it should also be recognised in some cases 16- and 17-year-olds could be living independently from their parents or guardians, for example through their exclusion from the family home, and will require a different level of intervention and support. Local authority children's social care will be the lead agency for these children and the designated safeguarding lead (or a deputy) should ensure appropriate referrals are made based on the child's circumstances. The Department for Levelling Up, Housing and Communities have published joint statutory guidance on the provision of accommodation for 16- and 17-year-olds who may be homeless and/or require accommodation: [here](#).

Mental health

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, attendance and progress at school.

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 Every Mind Matters for links to all materials and lesson plans.

Modern slavery and the National Referral Mechanism

Modern slavery encompasses human trafficking and 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. Further information on the signs that someone may be a victim of modern slavery, the support available to victims and how to refer them to the NRM is available in Statutory Guidance. Modern slavery: how to identify and support victims - GOV.UK

Preventing radicalisation

Note: This preventing radicalisation section remains under review, following the publication of a new definition of extremism on the 14 March 2024.

Children may be susceptible to radicalisation into terrorism. Similar to protecting children from other forms of harms and abuse, protecting children from this risk should be a part of a schools or colleges safeguarding approach.

Extremism is the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces.

Radicalisation

is the process of a person legitimising support for, or use of, terrorist violence.

Terrorism

is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

Although there is no single way of identifying whether a child is likely to be susceptible to radicalisation into terrorism, there are factors that may indicate concern.

It is possible to protect people from extremist ideology and intervene to prevent those at risk of radicalisation being drawn to terrorism. As with other safeguarding risks, staff should be alert to changes in children's behaviour, which could indicate that they may be in need of help or protection. Staff should use their judgement in identifying children who might be at risk of radicalisation and act proportionately which may include the designated safeguarding lead (or a deputy) making a Prevent referral.

The Prevent duty

All schools and colleges are subject to a duty under section 26 of the Counter- Terrorism and Security Act 2015, in the exercise of their functions, to have "due regard¹⁵² to the need to prevent people from becoming terrorists or supporting terrorism".¹⁵³ This duty is known as the Prevent duty.

The Prevent duty should be seen as part of schools' and colleges' wider safeguarding obligations. Designated safeguarding leads (and deputies) and other senior leaders in

education settings should familiarise themselves with the revised Prevent duty guidance: for England and Wales, especially paragraphs 141-210, which are specifically concerned with education (and also covers childcare). The guidance is set out in terms of three general themes: leadership and partnership, capabilities and reducing permissive environments.

The school or college's designated safeguarding lead (and any deputies) should be aware of local procedures for making a Prevent referral.

Channel

Channel is a voluntary, confidential support programme which focuses on providing support at an early stage to people who are identified as being susceptible to being drawn into terrorism. Prevent referrals are assessed and may be passed to a multiagency Channel panel, which will discuss the individual referred to determine whether they are at risk of being drawn into terrorism and consider the appropriate support required. A representative from the school or college may be asked to attend the Channel panel to help with this assessment. An individual will be required to provide their consent before any support delivered through the programme is provided.

The designated safeguarding lead (or a deputy) should consider if it would be appropriate to share any information with the new school or college in advance of a child leaving. For example, information that would allow the new school or college to continue supporting victims of abuse or those who are currently receiving support through the 'Channel' programme and have that support in place for when the child arrives.

Statutory guidance on Channel is available at: [Channel guidance](#) and [Channel training](#) from the Home Office.

Additional support

The Department has published further advice for those working in education settings with safeguarding responsibilities on the Prevent duty. The advice is intended to complement the Prevent guidance and signposts to other sources of advice and support.

The Home Office has developed three e-learning modules:

- Prevent awareness e-learning offers an introduction to the Prevent duty.
- Prevent referrals e-learning supports staff to make Prevent referrals that are robust, informed and with good intention.
- Channel awareness e-learning is aimed at staff who may be asked to contribute to or sit on a multi-agency Channel panel.

Educate Against Hate, is a government website designed to support school and college teachers and leaders to help them safeguard their students from radicalisation and extremism. The platform provides free information and resources to help staff identify and address the risks, as well as build resilience to radicalisation.

For advice specific to further education, the Education and Training Foundation (ETF) hosts the Prevent for FE and Training. This hosts a range of free, sector specific resources to support further education settings to comply with the Prevent duty. This includes the Prevent Awareness e-learning, which offers an introduction to the duty, and the Prevent Referral e-learning, which is designed to support staff to make robust, informed and proportionate referrals.

The Safeguarding and Prevent - The Education and Training Foundation (et-foundation.co.uk) provides online training modules for practitioners, leaders and managers, to support staff and governors/Board members in outlining their roles and responsibilities under the duty.

London Grid for Learning has also produced useful resources on Prevent ([Online Safety Resource Centre](#) - London Grid for Learning (lgfl.net)).

Sexual violence and sexual harassment between children in schools and colleges

Sexual violence and sexual harassment can occur between two children of any age and sex from primary to secondary stage and into colleges. It can also occur online. 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 and will be exacerbated if the alleged perpetrator(s) attends the same school or college. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and face to face (both physically and verbally) and are never acceptable.

It is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report. Detailed advice is available in Part five of this guidance.

Serious violence

There are a number of 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.

The likelihood of involvement in serious violence may be increased by factors 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.

A fuller list of risk factors can be found in the Home Office's Serious Violence Strategy. Professionals should also be aware that violence can often peak in the hours just before or just after school, when pupils are travelling to and from school. These times can be particularly risky for young people involved in serious violence.

Advice for schools and colleges is provided in the Home Office's Criminal exploitation of children and vulnerable adults: county lines guidance. The Youth Endowment Fund (YEF) Toolkit sets out the evidence for what works in preventing young people from becoming involved in violence.

Home Office funded Violence Reduction Units (VRU) operate in the 20 police force areas across England and Wales that have the highest volumes of serious violence, as measured by hospital admissions for injury with a sharp object. A list of these locations can be found here. As the strategic co-ordinators for local violence prevention, each VRU is mandated to include at least one local education representative within their Core Membership group, which is responsible for setting the direction for VRU activity. Schools and educational partners within these areas are encouraged to reach out to their local VRU, either directly or via their education Core Member, to better ingrain partnership working to tackle serious violence across local areas and ensure a joined up approach to young people across the risk spectrum.

Police, Crime, Sentencing and Courts Act 2022 introduced a new duty on a range of specified authorities, such as the police, local government, youth offending teams, health and probation services, to work collaboratively, share data and information, and put in place plans to prevent and reduce serious violence within their local communities. Educational authorities and prisons/youth custody authorities will be under a separate duty to co-operate with core duty holders when asked, and there will be a requirement for the partnership to consult with all such institutions in their area.

The Duty is not intended to replace or duplicate existing safeguarding duties. Local partners may choose to meet the requirements of the Duty through existing multi-agency structures, such as multi-agency safeguarding arrangements, providing the correct set of partners are involved.

So-called ‘honour’-based abuse (including female genital mutilation and forced marriage)

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

Actions

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

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

FGM mandatory reporting duty for teachers

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

Teachers must personally report to the police cases where they discover that an act of FGM appears to have been carried out.¹⁵⁵ Unless the teacher has good reason not to,

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

Further information can be found in the Multi-agency statutory guidance on female genital mutilation and the FGM resource pack particularly section 13.

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 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 (chapter 8 provides guidance on the role of schools and colleges) and, Multi-agency statutory guidance for dealing with forced marriage, which can both be found at The right to choose: government guidance on forced marriage - GOV.UK (www.gov.uk) 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. In addition, since February 2023 it has also been a crime to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday, even if violence, threats or another form of coercion are not used. As with the existing forced marriage law, this applies to non-binding, unofficial 'marriages' as well as legal marriages

Work Placements

No learners should go out on a placement if they will be working with a lone worker, for example a sole trader, family placement.

All learners, prior to attending a work placement/experience, should be advised of the college policy and procedures with regard to child / learner protection and safeguarding, in particular what to do if they have concerns regarding their wellbeing and safety whilst on work experience.

Appendix 6: Keeping yourself safe when responding to disclosures (the 6 R's – what to do if...)

1. Receive

- Keep calm
- Listen to what is being said without displaying shock or disbelief
- Take what is being said to you seriously
- Note down what has been said

2. Respond

- Reassure the pupil/learner that they have done the right thing in talking to you
- Be honest and do not make promises you cannot keep e.g. “It will be alright now”
- **Do not promise confidentiality;** you have a duty to refer
- Reassure and alleviate guilt, if the pupil/learner refers to it e.g. “you’re not to blame”
- Reassure the learner that information will only be shared with those who need to know

3. React

- React to the pupil/learner only as far as is necessary for you to establish whether or not you need to refer the matter, but do not interrogate for full details
- **Do not** ask leading questions; “Did he/she....?” Such questions can invalidate evidence.
- **Do** ask open “TED” questions; Tell, explain, describe
- Do not criticise the perpetrator; the pupil/learner may have affection for him/her
- Do not ask the pupil/learner to repeat it all for another member of staff
- Explain what you have to do next and who you have to talk to

4. Record

- Make some brief notes at the time on any paper which comes to hand and write them up as soon as possible
- Do not destroy your original notes
- Record the date, time, place, any non-verbal behaviour and the words used by the learner. Always ensure that as far as possible you have recorded the actual words used by the learner.
- Record statements and observable things rather than your interpretations or assumptions

5. Remember

- Contact the designated safeguarding adult lead (DSAL)
- The DSAL may be required to make appropriate records available to other agencies
- KSCMP: www.kscmp.org.uk and KSMAB.

6. Relax

- Get some support for yourself, dealing with disclosures can be traumatic for professionals


APPENDIX 7 Safeguarding incident / concern form



SAFEGUARDING INCIDENT / CONCERN FORM

COLLEGE / SCHOOL CONTACTS	
LINK19 College: 01474 555799 College Mobile: 07939 165625	Ifield School: 01474 365485
Learning name:	
Name and role of person completing form (please print):	
Date of incident /concern:	Time of incident/concern:
Incident/concern (Verbatim recording and who, what, where, when):	
Any other relevant information (witnesses, immediate action taken):	
Action taken:	
Signature of person completing form:	Date form completed (DD/MM/YY):
DSAL or Deputy DSAL action (including reasons and outcomes):	
Signature of Deputy DSAL:	Date:
Signature of DSAL:	Date:

Appendix 8: Kent Support Levels Guidance Sheet

 KENT SUPPORT LEVELS GUIDANCE SHEET 2			
UNIVERSAL SUPPORT LEVEL 1	ADDITIONAL SUPPORT LEVEL 2	INTENSIVE SUPPORT LEVEL 3	SPECIALIST SUPPORT LEVEL 4
<p>Universal services are provided to or are routinely available to all children and families. These services are accessed in the local community and delivered by partners including schools, GPs, hospitals, community health services, children's centres, youth hubs, police, fire service and voluntary and community groups</p>	<p>Children and families with additional needs who require extra help to improve education, parenting, behaviour or to meet specific health needs. These needs can be met by universal services working together or with the addition of some targeted services</p>	<p>Intensive support can be offered to children and families where they have complex or multiple needs requiring local authority services to work together with universal services to assess, plan and work with the family to bring about positive change. Includes Intensive Family Support Early Help and/or Child in Need services</p>	<p>Children who are considered to have been harmed or are likely to suffer significant harm as a result of abuse or neglect/ removal from home/or will suffer serious lasting impairment without the intervention of local authority statutory services under high level concern Child in Need (CIN) or high-risk Child Protection (CP) Services and Specialist Youth Justice work.</p> <p>Children whose disability affects all aspects of development.</p>
<p>If you require support for a child or family at this Support Level, here are some questions to ask yourself:</p> <p>What support is needed and where can I get this? The first step is to discuss any concerns with the family and agree what action is needed. This may be that your service is able to provide some extra support or it may be that you can signpost the family to another agency.</p> <p>Are the family requesting support?</p> <p>Yes—discuss support required and gain consent</p> <p>What support is needed and where can I get this? The first step is to discuss any concerns with the family and agree what action is needed. This may be that your service is able to provide some extra support or it may be that you can signpost the family to another agency</p> <p>Have I tried all my resources?</p> <p>All your inhouse resources should be tried before considering involving another agency.</p> <p>What other services can I contact locally for support, have I tried all these?</p> <p>Please check online for other services in your local area.</p> <p>What do I do next?</p> <p>This will depend upon the support required. Firstly speak to the family about which professionals or services are already involved with the children/family, consider other Universal Services e.g. GP or Health visitor, Nursery, Education/school, Church, Local Charity or Voluntary or Community group.</p>	<p>If you require support for a child or family at this Support Level, here are some questions to ask yourself:</p> <p>What support is needed and where can I get this? The first step is to discuss any concerns with the family and agree what action is needed and where the family would like to receive support from. Signpost the family or contact the service direct</p> <p>Ensure you have 'agreement to engage' before taking any action.</p> <p>Have I tried all my agency resources?</p> <p>All your inhouse resources should be tried before considering involving another agency.</p> <p>What other services can I contact locally for support, have I tried all these?</p> <p>Please check online for other services in your local area via KSCB website, Headstart Resilience Hub, SEND local offer or by contacting your local networks</p> <p>What do I do next?</p> <p>This will depend upon the type of support required. Firstly speak to the family about whom or which services are already involved with the children/family.</p> <p>With agreement other options available may include:</p> <ul style="list-style-type: none"> <i>Contact the child's school</i> <i>Contact a local Group or Charity</i> <i>Contact your local Borough Council</i> <i>Contact the School Health Team</i> <i>Contact your local Youth Hub</i> <i>Contact your local Children's Centre</i> 	<p>Does my concern meet this Support Level?</p> <p>Unsure—discuss your concerns with your agency Designated Safeguarding Lead.</p> <p>Yes—see below</p> <p>Do I have the agreement to engage?</p> <p>Yes—complete the Request for Support Form</p> <p>No—It is important that you share your concerns with the family and gain their agreement to complete the Request for Support form.</p> <p>Unsure—Please speak with family about your concerns and the support required and gain their 'agreement to engage' before completing the Request for Support form.</p> <p>Has any previous support helped?</p> <p>It is helpful to know what has worked well previously to identify the right support for the family. Please include this in the information you provide.</p> <p>Do you need advice?</p> <p>Please speak with your agency Designated Safeguarding Lead in the first instance.</p> <p>What do I do next?</p> <p>Agreement from the family to engage is required especially if Early Help is likely to be the most appropriate support for the family. If you have not discussed your concerns with the family please do so before completing the Request for Support Form.</p> <p>If you have 'agreement to engage' then</p> <p>Complete a Request for Support form</p> <p>www.kscb.org.uk/supportlevels</p>	<p>Does my concern meet this Support Level?</p> <p>Is this an immediate safeguarding concern?</p> <p>Yes—If there are concerns that a child may be suffering significant harm, the Request for Support form should be completed and immediately submitted to the Front Door. The Form can be located at www.kscb.org.uk/supportlevels</p> <p>Unsure—discuss your concerns with your agency Designated Safeguarding Lead.</p> <p>No—discuss your concerns with the family and gain their agreement to engage with services—see below</p> <p>Do I have consent/'agreement to engage'?</p> <p>The family's 'Agreement to Engage' is required before you complete the Request for Support form unless there is immediate risk, or if it places a child at risk of significant harm. A completed copy of the form should be shared with the family. You should therefore have discussed your concerns with the family and explored with them what the most appropriate support may be for them. The family should be aware that the form will be used to determine the most appropriate support available. If the family refuse 'Agreement to Engage' this should not influence the decision to complete a Request for Support form where the level of concern warrants this.</p> <p>What do I do next?</p> <p>Complete a Request for Support form</p> <p>Do you need any further information or guidance?</p> <p>Go to: www.kscb.org.uk/supportlevels</p>
<p>REMEMBER— You only need to complete a Request for Support Form if you are requesting support at Intensive or Specialist Support Levels 3 or 4.</p> <p>Please do take care when completing the online 'Request for Support' form, because the information you provide in the form, will be used to assess which is the most appropriate level of support required. If it is not assessed to require support at Level 3 or 4, the form will be returned to you so that you can consider the Support Level 1 or 2 options. For more information www.kscb.org.uk/supportlevels</p>			