



EMPOWERING
CREATIVE THINKERS

SAFEGUARDING AND CHILD PROTECTION POLICY

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Key contacts

Role	Name	Contact details
Designated Safeguarding Lead & Prevent Officer	Hannah Sapsford (Brighton & Bexhill)	07510 471215
Deputy Designated Safeguarding Lead	Uschi Schomig (Brighton)	01273 550432
Deputy Designated Safeguarding Lead	Claudia Mersh (Bexhill)	01424 213890
Local Authority Designated Officer (LADO)	Darrel Clews (Brighton)	01273 295643
	Amanda Glover (E. Sussex)	01323 747363
Children's Social Care – for reporting concerns And Targeted early help services for children and families	Brighton - Front Door For Families	01273 290400 (Out Of Hours Duty Service 01273 335905)
	East Sussex - Single Point of Advice (SPoA)	01323 4642222 (Out Of Hours Duty Service 01273 335906)

Dv8 Centres

12 Queen Square, Brighton. BN1 3FD 01273 550432
41 St Leonards Road, Bexhill TN40 1HS

Insert your new contact procedure:

<https://drive.google.com/drive/folders/1e3eRBMdQJ1Rojz20D0JmLtrLld5uHHfj>



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SAFEGUARDING POLICY FOR Dv8 SUSSEX

Introduction to Safeguarding Policy at Dv8

The aim of this policy is to provide an effective whole organisation safeguarding policy, which provides clear direction to staff and others about expected behaviour when dealing with safeguarding issues.

This policy also makes explicit Dv8's commitment to the development of good practice and sound procedures, ensuring that safeguarding concerns, referrals and monitoring are handled sensitively and professionally, supporting the needs of the learner.

Dv8 Sussex takes seriously its responsibility to protect and safeguard the welfare of children and young people in its care and this policy applies to all students, staff, volunteers and visitors to Dv8 Sussex.

We strive to ensure that all learners and staff at Dv8 are treated in line with our Equality and Diversity Policy and feel safe and supported at all times.

There are four main themes to our safeguarding policy:

- **Prevention** through the creation of a positive atmosphere and the teaching and pastoral support offered to learners.
- **Protection** by following agreed procedures, ensuring staff are trained and supported to respond appropriately and sensitively to safeguarding concerns.
- **Support** is provided to learners and staff who may be affected by safeguarding concerns or issues arising from them.
- **Safe** recruitment practices to ensure that any staff member or volunteer is recruited according to our overall Safeguarding Policy.

1. POLICY

We recognise that for our students, high self-esteem, confidence, supportive friends and clear lines of communication with a trusted adult helps to prevent abuse. Dv8 Sussex will therefore:

- Establish and maintain an environment where students feel safe and secure and are encouraged to talk, and are listened to.
- Ensure that students know that there are adults within Dv8 Sussex who they can approach if they are worried or are in difficulty.
- Where possible include in the curriculum activities and opportunities for personal and social development (PSD), which equip students with the skills they need to stay safe.
- Where possible include in the curriculum activities that will help students develop realistic attitudes to the responsibilities of adult life.



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- Ensure that wherever appropriate every effort will be made to establish effective working relationships with parents and/or colleagues from partner agencies.

The Legal Framework

- 1.1 Section 175 of the Education Act 2002 places a duty on governing bodies of maintained schools and further education institutions (including sixth-form colleges) to make arrangements for ensuring that their functions relating to the conduct of the college are exercised with a view to safeguarding and promoting the welfare of children who are students at the college. Section 157 of the same Act places a similar duty on non-maintained and independent colleges, including free schools and academies.
- 1.2 Under section 10 of the Children Act 2004, all maintained schools, further education colleges and independent colleges, including free schools and academies, are required to cooperate with the local authority to improve the well-being of children in the local authority area.
- 1.3 Under section 26 of the Counter-Terrorism and Security Act 2015, all schools and colleges are required to have “due regard to the need to prevent people from being drawn into terrorism”.
- 1.4 Under section 14B of the Children Act 2004, as amended by the Children & Social Work Act 2017, the Local Safeguarding Children Board or the Local Safeguarding Partners can require a school or further education institution to supply information in order to perform its functions. This must be complied with.
- 1.5 This policy and the accompanying procedures have been developed in accordance with local and national statutory and non-statutory guidance including:
 - 1.5.1 *Working Together to Safeguard Children: A Guide to Inter-Agency Working to Safeguard and Promote the Welfare of Children, July 2018*
 - 1.5.2 *Keeping Children Safe in Education: Statutory Guidance for colleges and Colleges, September 2018*
 - 1.5.3 *Pan-Sussex Child Protection and Safeguarding Procedures*

2. ROLES AND RESPONSIBILITIES

All adults working with or on behalf of children have a responsibility to protect them. There are, however, key people within Dv8 Sussex and the local authority who have specific responsibilities under safeguarding procedures. The names of those carrying out these responsibilities are listed on the cover sheet of this document.

Dv8 Sussex Designated Safeguarding Lead

This person has overall responsibility for the implementation and development of the Safeguarding Policy and Procedures across the organisation and to ensure that all correct procedures are being followed at all time across all centres.



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- The DSL will be the key liaison officer between Dv8, contract partners, children's social care, The Police, the local Prevent police/local authority officer and any other external parties relevant to any particular case.
- The DSL will ensure all safer recruitment procedures are adhered to and the single central record.
- The DSL will be informed of all disclosures and safeguarding concerns across the organisation.
- The DSL will ensure in partnership with the relevant Deputy Safeguarding Lead that protocols for implementing the Dv8 Safeguarding Policy are agreed in writing with all external partners at the start of any delivery contract.
- The DSL will review safeguarding concerns and reports termly with the panel.

Deputy Safeguarding Leads

It is the role of the Deputy Safeguarding Leads at each Dv8 delivery location to ensure that all of the safeguarding procedures are followed within their centre or Dv8 projects related to that centre and to report to the Designated Safeguarding Lead at Dv8 in the instance of any concerns or disclosures.

The first point of contact for any safeguarding concerns will be the DSL, if they are unavailable the panel and centre management team can be consulted.

Additionally, it is the role of the Deputy Safeguarding Leads to ensure that all staff members (including temporary staff and volunteers) are aware of Dv8's policy procedures and that they receive adequate training and support in this area.

If the Deputy Safeguarding Lead has any concerns about the suitability of any staff member or volunteer to work alongside young people or vulnerable adults this should be raised with the Senior Management Team and DSL immediately.

Senior Management Team

The Dv8 Senior Management Team are responsible for ensuring that Dv8 Sussex follows safe recruitment processes and that enhanced Disclosure and Barring Service (DBS) checks and full references are obtained promptly for all staff that will have substantial and unsupervised contact with students.

The Senior Management Team are responsible for ensuring that all appropriate safeguarding training is made available to all staff.

Line Managers

Line Managers are responsible for ensuring that new staff and volunteers are inducted fully into the Dv8 Safeguarding Policy and Procedures. All inductions should include information from the following Dv8 departments: Operations (Operational processes), Safeguarding Panel, Student Services Coordinators (safeguarding and pastoral), Head of TLA (Curriculum and Quality), MD (Organisational Mission, Vision, Values) and Finance / HR (Contract, Employment Handbook).



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Line managers are responsible for ensuring that any individual staff training needs regarding safeguarding are identified and addressed during staff member or volunteers' induction and that this is recorded on their induction paperwork.

All staff

All staff at Dv8 are responsible for ensuring that their own conduct at work is appropriate and within policy guidelines at all times. All staff are responsible for identifying concerns and passing them on to the panel members or Designated Safeguarding Officer at Dv8 and for recording and storing any relevant information in an appropriate manner as per our Data Protection Policy.

Visitors and Guest speakers

All external speakers to Dv8 will automatically be vetted via making sure that they are not from a 'proscribed organisation' (an organisation that does not recognise freedom of speech/expression - as listed on the home office website).

All guest speakers prior to visiting will be expected to give staff an overview of what they will be discussing at the time and a staff member is always present at the time of delivery. All guest speakers will be required to sign in and out of the building and all guest speakers will have to wear a visible ID badge at all times whilst in the centre.

Dv8 Safeguarding Advisory Panel

Aims & Objectives

1. To meet every termly to review learning points for child protection reports or concerns, assess safeguarding issues affecting the current students and action interventions and training accordingly.
2. To be accessible to every Dv8 Sussex staff member (whether contracted, freelance or volunteer).
3. To be chaired by a Designated Safeguarding Lead, with panel members including the Deputy Safeguarding Leads and Student Services Co-ordinators.
4. To be an open and supportive forum that focuses on all elements of safeguarding, child protection, learner and staff safety and pastoral care at Dv8 Sussex.
5. To use each forum as a safe place to discuss policy, legislation, good/bad practice and as a place to get advice on safeguarding-in-practice at Dv8 Sussex.
6. To regularly review the following subjects: e-safety, managing challenging behaviour, responding to disclosures of abuse, reporting thresholds, managing risk and local support services.
7. Meetings will observe client confidentiality and any information given on specific cases will only be as much as is needed to review Dv8 practice.
8. All participants should feel able to ask any question about safeguarding practice without judgement.
9. An agenda will be published in advance of the meeting, to which Dv8 staff members can contribute, but the emphasis will be on open discussion.
10. Meetings will be minuted, without specifying names involved with any particular cases.



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2. CHILD PROTECTION PROCEDURES

In the event of a concern regarding a young person's welfare

Any member of staff, volunteer or visitor to Dv8 Sussex who receives a disclosure or allegation of abuse, or suspects that a learner may have suffered significant harm or be at risk of suffering significant harm, or who notices signs or indicators of abuse must take the following action:

Immediately report to a Designated Safeguarding Officer, or to a Safeguarding panel member in their absence, for example the Deputy Safeguarding Officers. In the absence of either of the above, the matter should be brought to the attention of the most senior member of staff available. Please use the Dv8 Safeguarding Incident Report Form and complete all information where possible. The report should be forwarded as an attachment to the Designated Safeguarding Lead or a deputy in their absence.

The completed form must be stored safely and securely as per Dv8's Data Protection Policy and shared in a secure manner only with the appropriate panel member or DSL. The reports are locked in a filing cabinet in the centre office. Only the DSL and deputy have keys for this.

In the absence of electronic means of communication or the inability to physically deliver a report, a telephone call should be made to the relevant Designated Safeguarding Officer to report the appropriate information.

The DSL or their deputy will immediately follow the agreed protocols as per each programme contract to pass the information on to the relevant parties.

Support for the reporting member of staff will be given via their Line Manager and through supervision. If necessary the staff member should request an additional Supervision or support session with their Line Manager to discuss any issues affecting them personally and arising from a Child Protection concern.

Confidential information relating to a Child Protection Case should not be shared with any other members of staff or volunteers unless instructed by the DSL. Confidential information, such as names, addresses or other identifying characteristics should not be shared at any point with other personal contacts outside of Dv8.

Dv8 Sussex is committed to sharing referral information with learner's parents / carers unless to do so could place the learner at greater risk of harm or impede a criminal investigation. On these occasions advice will be taken from local authority social services or the police. Young people, where at all possible, should be fully informed of what and where information about them is being shared.

3. SAFE STAFFING

Dv8's Role



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It is important to remember that Dv8's role is to support the young people on our programmes to achieve whilst with us, overcome barriers to learning, grow personally and progress positively following our courses.

We are **NOT** a statutory body and within our usual activities cannot get overly involved in each young person's life outside of attending Dv8.

However what **WE CAN** do:

- 4.1 Provide a safe and welcoming environment;
- 4.2 Provide support, advice and guidance to young people;
- 4.3 Signpost young people to the correct statutory services;
- 4.4 Refer to support agencies where appropriate;
- 4.5 Mentor young people;
- 4.6 Provide a link between young people and other support agencies.

Recruitment and Appointment, DBS Checks and References

No member of staff, freelancer or volunteer will be allowed unsupervised access to learners until Dv8 has received the results of a satisfactory Enhanced DBS check and two references.

Any staff member (including volunteers) with previous convictions or concerns listed on an enhanced DBS check will be referred to the Managing Director to approve employment or placement.

Guest speakers or industry professionals visiting Dv8 to talk to young people will be supervised by a qualified and checked member of the Dv8 team and are therefore not required to complete a DBS check or Safeguarding Self Disclosure Form.

Any Dv8 staff member who works unsupervised with young people or vulnerable adults must be skill appropriate, DBS and reference cleared and fully informed about safeguarding responsibilities and procedures during their induction, briefings and awareness training.

Other staff members who rarely work unsupervised with young people such as office support staff will also be expected to complete a full DBS check on employment by Dv8.

Short term cover staff and volunteers who are with us for a short period of time (under 6 weeks) will not necessarily require a full DBS check (and may not receive their completed check in time if applied for) can still work on Dv8 programmes but must be supervised at all times by a member of staff who has been cleared by their Centre Co-ordinator to work unsupervised when in contact with young people or vulnerable adults. If the Centre Co-ordinator feels that this staff member will gain significant unsupervised access to young people through the programme and that it is not possible to supervise them at all relevant times, that person should not be asked to participate or work on the programme until these conditions can be met or their DBS check is processed fully.

If it is expected that a staff member will return to Dv8 to work again in the near future a DBS check should be completed as soon as possible.



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The Line Manager is responsible for organising and chasing the completion of an enhanced DBS check on any new member of staff. The Centre Co-ordinators will have access to links for online application of DBS. This should be done upon offering employment or as soon as possible afterwards

If the new staff member has an existing Enhanced DBS check from a previous organisation that is dated within 3 months and is supported by a reference from that employer, portability of that DBS check will be accepted in the interim period.

In this case the Line Manager should apply for a new, enhanced DBS check within one year of the original disclosure date.

All applicants must have their relevant ID approved by the nominated person at Dv8.

Any disclosure information on the DBS checks will be destroyed upon clearance by the Managing Director. The section relating to name and address, disclosure number and name of nominated officer will be stored in the staff members personnel file.

The Line Manager will be informed by the Dv8 Nominated DBS Officer when the DBS clearance has arrived and been approved.

References

All staff and volunteers are required to provide two referees relevant to their professional history. This process will be overseen by their Line Manager and references should be obtained directly from the referee rather than the applicant or any third party.

Both references should be from recent previous employers and from a staff member senior in post to the applicant. If this is not possible then the referees must be obtained from any other relevant professional or education contact of the applicant. Personal references from friends and family are not acceptable.

All posts, paid or unpaid will only be offered subject to satisfactory references being obtained. Any concerns raised by the Line Manager following these references being obtained should be referred to the Managing Director before employment is agreed.

Job Descriptions - Skills and Competencies

All staff job descriptions should reflect the skills and competencies required to work within their current role at Dv8.

This is monitored and reviewed via line managers as per the Dv8 Supervision and Appraisal Policy and Procedure.

Induction

Temporary staff and volunteers who work with students at Dv8 will, through induction, be made aware of the company's arrangements for safeguarding and their responsibilities.



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The minimum safe induction should include all the below points and should begin on the first day of employment for all staff members.

Understanding of the policies by the staff member should be checked by line manager and signed by both line manager and staff member within the first two weeks of employment: The Centre Co-ordinator signing should signify that they are happy that the staff member has a thorough understanding of all relevant policies and procedures.

Dv8's Aims, Mission and Values
Roles and Responsibilities
Code of Conduct
Child Protection and Safeguarding
Health and Safety Policy
Equality and Diversity Policy
Risk Assessment and Hazard Awareness

Please see Safe Recruitment Policy for more information.

5. GENERAL SAFEGUARDING AND CODES OF CONDUCT

Staff and volunteers must maintain professional boundaries at all times and perform a support and guidance role impartially and objectively, meeting the needs of the students.

It must be remembered at all times that our role is not to be the student's friends or confidantes and we must follow correct protocol and procedures in all contact we have with students at Dv8.

Staff Conduct

Staff and volunteers must demonstrate proper personal and professional behaviour at all times promoting positive role models for the people that they work with.

Relationships

Staff and volunteers are expected to develop positive, professional relationships with students that are based on openness, honesty, trust and respect. They must not engage in any personal relationships with course participants or meet with them in any context outside of Dv8 hours. This is to protect staff, volunteers and Dv8 from any accusations of inappropriate behaviour and must be observed at all times.

Personal Contact

Staff members and volunteers should never give students any personal details such as personal phone number, personal email address, or home address.

Under no circumstances should a staff member or volunteer ever accept or offer a friend request from or to a current or past student or their family through a personal account on any social networking site such as Facebook and Twitter or any online forum, blog, gaming site or any other similar site.



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Please see Dv8's E-Safety policy for further information on use of electronic means of communication at Dv8.

If a staff member meets or sees a student unintentionally when outside the workplace contact should not be initiated by the staff member and must be kept to a minimum. Where possible the staff member should immediately leave the situation and avoid contact at all.

Dv8 discourages the sharing of personal information such as sexuality, personal history, personal religious beliefs, past or present relationships, family and social life with students.

Confidentiality

- Any information relevant to a student's support and wellbeing imparted to you by a student at Dv8 must be shared with the relevant line manager who will then decide how that information should be shared with other relevant Dv8 staff members or stakeholders.
- Other project staff will be informed of relevant information in respect of individual cases regarding safeguarding on a "need to know basis". Any information shared with a member of staff in this way must be held confidentially by them.
- Where sharing will be in the best interests of the relevant student information will be shared with other support organisations or stakeholders
- However, outside of the Dv8 staff team you have a legal responsibility to keep confidential any information relating to students at Dv8 unless otherwise instructed by your line manager. This applies both during and after your time spent working or volunteering with Dv8.
- Under no circumstances must a staff member promise to keep a secret for a student or collude with a student to conceal information.
- All students at Dv8 must sign an agreement upon induction stating that they understand and agree to Dv8's Confidentiality Policy.

Attendance and Timekeeping

You are expected to be punctual at all times and let the Dv8 Management Team, know if you will be late or unable to attend. You are expected to do this at the earliest possible opportunity by calling the Dv8 office: 01273 550432. Office hours are Monday-Friday: 9.15-5.15pm. The Bexhill Office 01424 213 890 the office hours are the same.

Health and Safety

You have a duty to take reasonable care of your health and safety whilst at work and that of your fellow staff members, volunteers and students. Dv8's Health and Safety Policy and Procedures must be followed at all times and at all delivery locations.

General Welfare Concerns



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Where concerns do not relate to the immediate risk of significant harm the DSL will discuss the concerns with relevant colleagues and agree a plan of action which will be recorded on the relevant recording system for your centre. A confidential student welfare log should be kept, with access restricted to staff with whom the learner has regular contact and the DSL. An electronic copy of this will be password encrypted, or a physical copy will be kept in a locked cabinet.

It may be appropriate to carry out a Common Assessment Framework (CAF) procedure. If this is deemed appropriate the CAF will be completed by the student's support worker, in conjunction with the relevant course manager, with support from the designated safeguarding coordinator if necessary. Further information can be found in Local Safeguarding Children Board (LSCB) guidance.

Where concerns about the safety or wellbeing of a young person exist it may be appropriate to approach relevant agencies (former schools, colleges etc) to see if there is any relevant information available.

Whistle Blowing

We recognise that children cannot be expected to raise concerns in an environment where staff members do not do so.

Therefore all staff should be aware of their duty to raise concerns about the attitude or actions of colleagues in accordance with the Dv8 Whistle Blowing policy.

Complaints

Complaints by young people can be made under the complaints procedure in the learner handbook.

Complaints by staff can be made under the complaints procedure in the staff handbook.

Training

- All DSL at Dv8 will have completed recognised and, ideally, accredited Designated Child Protection Officer NSPCC Training.
- All staff and volunteers will undertake appropriate in-house or external Safeguarding and Child Protection training to equip them to carry out their responsibilities effectively. This will be kept up to date by refresher training every two years.
- All staff complete the online ETF Prevent training on induction
- All staff will attend yearly 'Prevent' training (at the all staff Inset day) which covers the main parts of the agenda and how it applies to our work specifically at Dv8.
- Staff leading on the prevent agenda have all attended 'prevent strategy' training from the ETF.
- Where possible, all staff and volunteers will be given opportunities to attend external training courses in Safeguarding and Child Protection as identified in supervision by their Line Manager.
- Support is available for staff from the Designated Safeguarding Officers where there are concerns or queries about safeguarding.



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- All staff are offered guidance on the boundaries of appropriate behaviour and conduct. These matters form part of staff induction and this guidance is available in the Staff Code of Conduct.
- Each Dv8 training centre will have a resources file, with up-to-date guidance on safeguarding and child protection good practice, including how to spot signs of abuse. It is the responsibility of the Student Services Co-ordinator to keep this up-to-date.

6. RECORDS AND MONITORING

Well-kept records are essential to good safeguarding practice. Dv8 Sussex is clear about the following:

- The need to accurately and securely record any concern held about a student within the company
- The confidentiality status of such records
- When these records should be passed over to other agencies

Any member of staff receiving a disclosure of abuse or noticing signs or indicators of abuse must complete a Child Protection Incident form. All records will be dated and signed and will include the action recommended/taken.

Any staff member concerned about a student's welfare and behaviour but who has not received a direct disclosure, noticed indicators of abuse or does not believe that the learner is at risk of immediate significant harm should ensure these concerns are still logged and shared with relevant staff members using the centre's own student welfare logging system.

Any updates should be initialled and dated by the staff member and the line manager notified as soon as possible.

Any safeguarding or cause for concern forms must be kept in a confidential file, which is kept separate to other files and stored in a secure place at the relevant centre.

If a student transfers from Dv8 Sussex to another training provider, these files may be copied and forwarded to the student's new establishment marked confidential and for the attention of the designated safeguarding coordinator if this is deemed to be in the student's best interests.

7. ATTENDANCE AT SAFEGUARDING CONFERENCES AND CORE GROUPS

It is the responsibility of the DSL to ensure that Dv8 is represented or a report is submitted to any safeguarding conference called for students on programmes at Dv8 or previously known to them. Whoever attends should be fully briefed on any issues or concerns Dv8 has and be prepared to make decisions on registration at the end of the conference.

When a student is the subject of a safeguarding plan, it is the Designated Safeguarding Lead's responsibility to ensure that the student is monitored regarding their attendance, welfare and presentation.

If Dv8 is part of the core group then the Safeguarding Lead should ensure that Dv8 is represented at these meetings and that there is a record of attendance and issues discussed.



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All concerns about the safeguarding plan and / or the student's welfare should be discussed and recorded at the core group meeting unless the student is at further risk of significant harm before the meeting date. In this case the Safeguarding Lead must inform the student's key worker or social worker immediately and then record that they have done so and the actions agreed.

8. PAID INTERNSHIPS & WORK EXPERIENCE PLACEMENTS

For students on our Paid Internship Program or under 18s who are on work placement that are working on their own within a placement Dv8 will conduct an enhanced DBS check and an ISA check (if appropriate) on that individual.

Dv8 will provide guidance to placement providers as to appropriate action they should take if a student discloses to them.

Dv8 will provide guidance to young apprentices or students who are on work placement as to action they should take if they have any concerns about their placement

All work placements and apprenticeship employers will undergo vetting by a qualified health & safety officer if any learners are under 18. It will be recognised as good practice to have similar checks for all employers working with Dv8 students.

9. ONLINE SAFEGUARDING

Online safety covers issues relating to children and young people as well as adults and their safe use of the internet, mobile phones and other electronic communications technologies, both in and out of college. It includes education for all Dv8 staff and learners about risks and responsibilities and is part of the 'duty of care' which applies to everyone working with young people and vulnerable adults.

Please see Dv8's E-Safety Policy for full guidance about safeguarding on digital platforms.

10. RISK ASSESSMENT OF ACTIVITIES AND TRIPS

In order to safeguard students, all new project activities, as well as activities that take place outside of Dv8 designated training centres, must be prepared for and risk assessed. All risk assessments must take into account physical, emotional and psychological outcomes of risks and hazards – and must be signed off by a Centre Co-ordinator or the Head of Teaching and Learning. Failure by staff to adequately prepare for and risk assess any trips or visits may lead to disciplinary action under the disciplinary procedure.

11. SUPPORTING STUDENTS AT RISK

Dv8 recognises that children and young people who are abused or who witness violence may find it difficult to develop a sense of self-worth or view the world as a positive place.

Dv8 may be the only stable, secure and predictable element in the lives of children at risk.

Nevertheless, whilst at Dv8 their behaviour may still be challenging and defiant or they may not actively participate.

Dv8 will endeavour to support pupils through:



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- i. The curriculum to encourage self-esteem and self-motivation as well as raising awareness of risks from exploitation and radicalisation.
- ii. The organisational ethos which promotes a positive, supportive and secure environment and which gives all students and staff a sense of being respected and valued.
- iii. The implementation of Dv8's Behaviour Management policies.
- iv. A consistent approach agreed by all staff which will endeavour to ensure the student knows that some behaviour is unacceptable but s/he is valued.
- v. Regular liaison with other professionals and agencies that support students and their families.
- vi. A commitment to develop productive, supportive relationships with parents and carers, whenever it is in the student's best interest to do so.
- vii. The development and support of a responsive and knowledgeable staff group, trained to respond appropriately in safeguarding situations.
- viii. Recognition that, statistically, children with behavioural difficulties and disabilities are most vulnerable to abuse, so staff who work in any capacity with students with profound and multiple disabilities, sensory impairment and / or emotional and behavioural problems will need to be particularly sensitive to signs of abuse.
- ix. Recognition that in a home environment where there is domestic violence or drug or alcohol abuse, students may also be vulnerable and in need of support or protection.

10. ALLEGATIONS ABOUT STAFF

It is essential that the high standards of concern and professional responsibility are adopted with regard to alleged child abuse by parents or carers are similarly displayed when members of staff are accused of abuse.

Only authorised agencies may investigate child abuse allegations (local authority social services, the police or in some areas, the NSPCC). Whilst it is permissible to ask the student(s) simple, non-leading questions to ascertain the facts of the allegation, formal interviews and the taking of statements is not appropriate and may prejudice investigations.

All allegations should be recorded using the safety and welfare concern form and guidance notes by the person receiving the disclosure. That person should also contact the DSP or Managing Director immediately after any allegation is made.

Where a staff member is accused of abuse, the DSL should in the first instance contact the Local Area Designated Officer (LADO). If the allegation is not of abuse then Dv8's normal disciplinary procedure will apply.

Through discussion and consultation with the LADO, a decision will be made whether to make a referral to local authority social services and / or the police. Where the allegation is against the Managing Director or DSL, another member of the senior management team will take this action. The member of staff against whom the allegation is made will be kept informed about the allegation and the progress of the complaint, unless to do so may cause the risk harm to the complainant.

If after discussion with the LADO it is decided that a referral to local authority social services or police is not appropriate, it may still be necessary to address matters in accordance with the Dv8's disciplinary procedures.



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11. POLICY REVIEW

The Dv8 Senior Management Team is responsible for ensuring the annual review of this policy. Previous versions of the policy are to be kept to demonstrate progress and developments made. The Dv8 Senior Management Team is responsible for ensuring that the list of key contacts on the cover sheet is kept up to date.

Reference Documents

All action is taken in line with the following guidance;

- Local Safeguarding Children Board (LSCB) guidelines
- “Safeguarding Children in Education” (DfES/0027/2004)
<http://www.teachernet.gov.uk/wholeschool/familyandcommunity/childprotection/>
- “What To Do If You’re Worried A Child Is Being Abused” (published by Department of Health, DfES, Department of Culture Media and Sports, Home Office, Office of Deputy Prime Minister and the Lord Chancellors Department)
- Working Together to Safeguard Children (2006, Department of Health)
- The Prevent Strategy (June 2011, Home Office).

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Appendix A - Child Protection and Safeguarding Procedures

1 Definitions

- 1.1 **Abuse**, including neglect, is a form of maltreatment. A person may abuse a child by inflicting harm or by failing to prevent harm. Children may be abused within their family, in an institutional or community setting, by those known to them, or, more rarely, by a stranger.
- 1.2 **Children** are any people who have not yet reached their 18th birthday; a 16-year-old, whether living independently, in further education, in the armed forces or in hospital, is a child and is entitled to the same protection and services as anyone younger.
- 1.3 **Child protection** is part of safeguarding and promoting the welfare of children and refers to activity undertaken to protect specific children who are suffering, or likely to suffer, significant harm.
- 1.4 **Early Help** means providing support as soon as a problem emerges, at any point in a child's life, from the foundation years to teenage years.
- 1.5 **Harm** is ill treatment or impairment of health and development, including impairment suffered from seeing or hearing the ill treatment of another.
- 1.6 **Safeguarding children** is the action we take to promote the welfare of children and protect them from harm. **Safeguarding and promoting the welfare of children** is defined in *Working Together to Safeguard Children: A Guide to Inter-Agency Working to Safeguard and Promote the Welfare of Children (July 2018)* as:
 - protecting children from maltreatment;
 - preventing impairment of children's health and development;
 - ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and
 - taking action to enable all children to have the best outcomes.
- 1.7 **Significant harm** is the threshold that justifies compulsory intervention in the family in the best interests of the child. Section 31 of the Children Act 1989 states 'where the question of whether harm suffered by a child is significant turns on the child's health or development, his health or development shall be compared with that which could reasonably be expected of a similar child.'
- 1.8 For more definitions, see *Pan-Sussex Child Protection and Safeguarding Procedures*.

2 Categories of Abuse

- 2.1 **Emotional abuse** is the persistent emotional maltreatment of a child such that it causes severe and persistent adverse effects on the child's emotional development. It may involve:



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- making a child feel worthless, unloved or inadequate
- only there to meet another's needs
- inappropriate age or developmental expectations
- overprotection and limitation of exploration, learning and social interaction
- seeing or hearing the ill treatment of another, e.g. domestic abuse
- making the child feel worthless and unloved - high criticism and low warmth
- serious bullying (including cyber bullying)
- exploitation or corruption

Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

2.2 **Neglect** is the persistent failure to meet a child's basic physical 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 misuse. Once a child is born, it may involve a parent 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
- ensure access to appropriate medical care or treatment

It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

2.3 **Physical abuse** may involve hitting, shaking, throwing, poisoning, burning, 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.

Physical abuse is not solely perpetrated by adults. Children can also commit acts of physical abuse.

2.4 **Sexual abuse** involves forcing or enticing a child or young person to take part in sexual activities, including prostitution, whether or not the child is aware of what is happening. Activities may involve physical contact, including penetration of any part of the body, or non-penetrative acts. They may include non-contact activities, such as involving children looking at or in the production of sexual images, including on the internet, watching sexual activities, or encouraging children to behave in sexually inappropriate ways.

Child sexual exploitation is also sexual abuse; it involves children and young people receiving something, for example accommodation, drugs, gifts or affection, as a result of them performing sexual activities, or having others perform sexual activities on them. It could take the form of grooming of children, e.g. to take part in sexual activities or to post sexual images of themselves on the internet.



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Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

3 Specific Safeguarding Issues

3.1 college staff members need to be aware of specific safeguarding issues, as identified in *Keeping Children Safe in Education*. Chapter 8 of the *Pan-Sussex Child Protection and Safeguarding Procedures* has detailed information about local procedures for some specific issues.

3.2 Keeping Children Safe in Education identifies the following specific safeguarding issues:

Children and the court system
Children missing from education
Children with family members in prison
Child sexual exploitation
Child criminal exploitation: county lines
Domestic abuse
Homelessness
So-called 'honour-based' violence - including female genital mutilation (FGM), forced marriage, and practices such as breast ironing
Radicalisation
Peer on peer abuse – bullying and cyberbullying
Peer on peer abuse – physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm
Peer on peer abuse – initiation/hazing type violence and rituals
Peer on peer abuse – sexting (youth produced sexual imagery)
Peer on peer abuse – sexual violence and sexual harassment
Substance Misuse (drugs and alcohol)
Truancy (deliberately missing education)

3.3 Keeping Children Safe in Education Part 5 covers child on child sexual violence and sexual harassment.

3.4 Keeping Children Safe in Education Annex A contains important additional information about some specific forms of abuse and safeguarding issues:

Children and the court system
Children missing from education



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Children with family members in prison
Child sexual exploitation
Child criminal exploitation: county lines
Domestic abuse
Homelessness
So-called 'honour-based' violence
Preventing radicalisation
Peer on peer abuse
Sexual violence and sexual harassment between children in colleges and colleges

Keeping Children Safe in Education Annex C contains important additional information about online safety.

- 3.5 Brighton & Hove Local Safeguarding Children Board has additional information and guidance on some of these issues at:
<http://www.brightonandhovelscb.org.uk/professionals/>

3.6 **Further Information on Children Missing from Education**

Children going missing, particularly repeatedly, can act as a vital warning sign of a range of safeguarding possibilities. This may include abuse and neglect, which may include sexual abuse or exploitation and child criminal exploitation. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation or risk of forced marriage. Early intervention is necessary to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child going missing in future. Staff should be aware of the college's unauthorised absence and the Local Authority's children missing from education procedures.

3.7 **Further information on Child Sexual Exploitation**

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

- can affect any child or young person (male or female) under the age of 18 years, including 16 and 17 year olds who can legally consent to have sex;
- can still be abuse even if the sexual activity appears consensual;



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- can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity;
- can take place in person or via technology, or a combination of both;
- can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence;
- may occur without the child or young person's immediate knowledge (e.g. through others copying videos or images they have created and posted on social media);
- can be perpetrated by individuals or groups, males or females, and children or adults. The abuse can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse; and
- is typified by some form of power imbalance in favour of those perpetrating the abuse. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources.

Some of the following signs may be indicators of child sexual exploitation:

- children who appear with unexplained gifts or new possessions;
- children who associate with other young people involved in exploitation;
- children who have older boyfriends or girlfriends;
- children who suffer from sexually transmitted infections or become pregnant;
- children who suffer from changes in emotional well-being;
- children who misuse drugs and alcohol;
- children who go missing for periods of time or regularly come home late; and
- children who regularly miss college or education or do not take part in education.

3.8 Further Information on Child Criminal Exploitation

Criminal exploitation of children is a geographically widespread form of harm that is a typical feature of county lines criminal activity: drug networks or gangs groom and exploit children and young people to carry drugs and money from urban areas to suburban and rural areas, market and seaside towns. Key to identifying potential involvement in county lines are missing episodes, when the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism should be considered. Like other forms of abuse and exploitation, county lines exploitation:

- can affect any child or young person (male or female) under the age of 18 years;
- can affect any vulnerable adult over the age of 18 years;
- can still be exploitation even if the activity appears consensual;
- can involve force and/or enticement-based methods of compliance and is often accompanied by violence or threats of violence;



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- can be perpetrated by individuals or groups, males or females, and young people or adults; and
- is typified by some form of power imbalance in favour of those perpetrating the exploitation. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, cognitive ability, physical strength, status, and access to economic or other resources.

3.9 Further Information on Domestic Violence

The cross-government definition of domestic violence and abuse is:

Any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass, but is not limited to:

- psychological;
- physical;
- sexual;
- financial; and
- emotional

Exposure to domestic abuse and/or violence 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. Domestic abuse affecting young people can also occur within their personal relationships, as well as in the context of their home life.

3.10 Further information on Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The Homelessness Reduction Act 2017 places a new duty to refer service users for support. The designated safeguarding lead (and any deputies) should be aware of contact details and referral routes in to 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, this does not, and should not, replace a referral into children's social care where a child has been harmed or is at risk of harm.

In most cases college 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. Children's services will be the lead agency for these young people and the designated safeguarding



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lead (or a deputy) should ensure appropriate referrals are made based on the child's circumstances.

3.11 **Further information on Female Genital Mutilation (FGM)**

Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a girl being at risk of FGM, or already having suffered FGM. There are a range of potential indicators that a child or young person may be at risk of FGM, which individually may not indicate risk but if there are two or more indicators present this could signal a risk to the child or young person. Victims of FGM are likely to come from a community that is known to practise FGM. Professionals should note that girls at risk of FGM may not yet be aware of the practice or that it may be conducted on them, so sensitivity should always be shown when approaching the subject. Staff should activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and children's social care.

Warning signs that FGM may be about to take place, or may have already taken place, can be found in the [Brighton and Hove FGM Multi Agency Resource Pack](#) or within the e-learning for all professionals, developed by the Home Office, available at www.fgmelearning.co.uk

Girls who are threatened with, or who have undergone FGM may withdraw from education, restricting their educational and personal development. They may feel unable to go against the wishes of their parents and consequently may suffer emotionally. Staff may become aware of a student because she appears anxious, depressed and emotionally withdrawn. They may be presented with a sudden decline in her performance, aspirations or motivation. There may be occasions when a student comes to educational establishment or college but then absents herself from lessons, possibly spending prolonged periods in the bathroom.

Students who fear they may be at risk of FGM can often come to the attention of, or turn to, a teacher, lecturer or other member of staff before seeking help from the police or social services. Sometimes the student's friends report it to staff. Teachers, lecturers and other members of staff are in an ideal position to identify and respond to a victim's needs at an early stage.

Staff should be aware of mandatory reporting requirements with regards to known cases of female genital mutilation (FGM) which require teachers to personally report to the police cases where they discover that an act of FGM appears to have been carried out. Further details can be found Annex A of Keeping Children Safe in Education September 2016

3.12 **Further Information on Forced Marriage**

A forced marriage is one in which at least one participant does not (or cannot) consent to the marriage and pressure or abuse is used. It is recognised in the UK as a serious abuse of human rights.

The pressure put on people to marry against their will can be physical (including threats of violence, actual physical violence and sexual violence) or emotional and psychological (e.g. shame and coercion) Financial abuse can also be a factor.



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Whilst it is unlikely that primary-age students will be the victims of forced marriage, they may disclose that older siblings or parents are at risk.

3.13 Further information on Preventing Radicalisation

The Counter-Terrorism and Security Act, which received Royal Assent on 12 February 2015, places a duty on specified authorities, including local authorities and childcare, education and other children's services providers, in the exercise of their functions, to have due regard to the need to prevent people from being drawn into terrorism ("the Prevent duty"). This came into force on 1 July 2015. The Prevent duty directs inspectors to examine a educational establishment's response to extremist behaviour when considering the behaviour and safety of students, as well as the effectiveness of the leadership and management of the educational establishment in preventing extremism.

The Counter-Terrorism and Security Act 2015 also places a duty on local authorities to ensure Channel panels are in place. The panel must include the local authority and chief officer of the local police. Panels will assess the extent to which identified individuals are vulnerable to being drawn into terrorism, following a referral from the police and where considered appropriate and necessary consent is obtained, arrange for support to be provided to those individuals. The Act will require partners of Channel panels to co-operate with the panel in the carrying out of its functions and with the police in undertaking the initial assessment as to whether a referral is appropriate.

Educational establishments and colleges which are required to have regard to Keeping Children Safe in Education are listed in the Act as partners of the panel. The relevant provisions of the Act came into force on 12 April 2015 but many local authorities already have Channel panels set up in their area.

Channel Training

'Channel' is the name for the process of referring a person for early intervention and support, including:

- identifying people at risk of being drawn into terrorism
- assessing the nature and extent of that risk, and
- developing the most appropriate support plan for the people concerned.

The Channel process is about safeguarding children, young people and adults from being drawn into committing terrorist-related activity. It is about early intervention to protect and divert people away from risk before a crime occurs.

You can complete a short general awareness course online:

http://course.ncalt.com/Channel_General_Awareness/01/index.html

Prevent is the pan-Sussex strategy for preventing vulnerable people from being radicalised into violent extremism: The pan Sussex Prevent describes partner's (including educational establishments) role in the Prevent agenda:

Sharing with colleagues



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- Promote awareness of the PREVENT strategy within your organisation and partners, including the local risks, roles and responsibilities involved in its delivery
- Ensure colleagues and partners are aware of how to report any potentially relevant information or concerns
- Promote an understanding amongst colleagues and partners of how to identify indicators of terrorism
- Promote an understanding amongst colleagues and partners of how to identify potential signs of individual vulnerability to radicalisation.
- Indicators of terrorist activity

The Department for education has published The Prevent Duty Departmental advice for educational establishments and childcare providers at:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/439598/prevent-duty-departmental-advice-v6.pdf

3.14 Further Information on Sexting

Sexting among children and young people can be a common occurrence, where they often describe these incidents as 'mundane'. Children involved in sexting incidents will be dealt with by the police as victims as opposed to perpetrators, unless there are mitigating circumstances. The Designated Safeguarding Lead should record all incidents of sexting. This should include both the actions taken and the actions not taken, together with justifications. In applying judgement to the sexting incident consider the following:

- Significant age difference between the sender/receiver involved
- If there is any external coercion involved or encouragement beyond the sender/receiver.
- If you recognise the child as more vulnerable than is usual.
- If the image is of a severe or extreme nature.
- If the situation is not isolated and the image has been more widely distributed.
- If this is not the first time children have been involved in a sexting act
- If other knowledge of either the sender or recipient may add cause for concern.

If these characteristics present cause for concern then escalate or refer the incident. If not, manage the situation accordingly, recording details of the incident, action and resolution. See "Sexting in colleges and colleges: Responding to incidents and safeguarding young people" (published by UKCCIS) at

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/609874/6_2939_SP_NCA_Sexting_In_colleges_FINAL_Update_Jan17.pdf

3.15 Further information on Private Fostering

Parents and carers often fail to notify colleges about private fostering arrangements even though they are legally required to notify Children's Services. Often this is because they are



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unaware of the requirements. They believe that this is a private family arrangement which does not concern anybody else.

This lack of awareness means that many privately fostered children remain hidden and can be vulnerable, as in the case of Victoria Climbié who was a privately fostered child.

Private Fostering definition

Private fostering occurs when a child under 16 (or 18 if the child is disabled) is cared for and lives with an adult who is not a relative for 28 days or more. The following are considered to be relatives: a step parent (by marriage or civil partnership), grandparent, step grandparent, brother, sister, uncle or aunt.

Private fostering is a private arrangement made by the parent(s), (or those with parental responsibility) for someone to care for their child because they are unable to do so (permanently or temporarily). This may be due to a number of reasons such as parental ill health, a parent going abroad or in to prison, a child being brought to the UK to study English or the relationship between the child and parent has broken down.

College staff play an essential role in identifying privately fostered children. If you know a child is being privately fostered you should advise the parent/carer that they have a legal obligation to report the arrangement to Children Social Care at least six weeks before it happens or within 48 hours if the arrangement is current having been made in an emergency.

Alert your Designated Safeguarding Lead who will ensure this is followed up with Children Social Care and the arrangement is assessed, approved and monitored

4 **Recognition – What To Look For**

4.1 Staff members should refer to the detailed information about the categories of abuse and risk indicators in the *Pan-Sussex Child Protection and Safeguarding Procedures* for further guidance.

4.2 In an abusive relationship, the child may:

- appear frightened of their parent(s)
- act in a way that is inappropriate to their age and development, although full account needs to be taken of different patterns of development and different ethnic groups

4.3 In an abusive relationship, the parent or carer may:

- persistently avoid child health services and treatment of the child's illnesses
- have unrealistic expectations of the child
- frequently complain about or to the child and fail to provide attention or praise
- be absent
- be misusing substances



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- persistently refuse to allow access on home visits by professionals
- be involved in domestic violence and abuse
- be socially isolated

4.4 Serious case reviews have found that parental substance misuse, domestic abuse and mental health problems, sometimes referred to as the ‘toxic trio’, if they coexist in a family could mean significant risks to children. Problems can be compounded by poverty, frequent house moves or eviction.

4.5 Staff should be aware that children with special educational needs and disabilities can face additional safeguarding challenges including:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child’s disability
- children with special educational needs and disabilities are particularly vulnerable to bullying and often show no outward signs
- communication issues can be a barrier to effective safeguarding

5 **Peer on Peer Abuse – Managing Allegations of Abuse Made Against Other Children**

5.1 At our college we believe that all children have a right to attend and learn in a safe environment. Children should be free from harm by adults and other students.

We recognise that some students will sometimes negatively affect the learning and wellbeing of others and their behaviour will be dealt with under the college’s Behaviour Policy or Anti-Bullying Policy when appropriate.

We are mindful of the need to follow published guidance and to seek advice and support from other professionals when appropriate. We will report directly to police when guidance indicates that a criminal offence may have been committed.

5.2 **Safeguarding allegations**

It is important to remember that Peer-on-Peer Abuse does not occur in a vacuum. It occurs in a society where there are structures and norms that shape young people’s views, experiences and behaviours, as well as responses to them. Consequently there are different issues of gender that will need to be considered when responding to allegations made against students by others in the college, which are of a safeguarding nature. Safeguarding issues raised in this way may include physical abuse, emotional abuse, sexual abuse and sexual exploitation. It is likely that to be considered a safeguarding allegation against a student, some of the following features will be found.

The allegation:

- is made against an older student and refers to their behaviour towards a younger student or a more vulnerable student
- is of a serious nature, possibly including a criminal offence
- raises risk factors for other students in the college



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- indicates that other students may have been affected by this student
- indicates that young people outside the college may be affected by this student

5.3 **Examples of safeguarding issues against a student could include:**

Physical Abuse

- violence, particularly pre-planned
- forcing others to use drugs or alcohol

Emotional Abuse

- blackmail or extortion
- threats and intimidation

Sexual Abuse

- indecent exposure, indecent touching or serious sexual assaults
- forcing others to watch pornography or take part in sexting

Sexual Exploitation

- encouraging other children to attend inappropriate parties
- photographing or videoing other children performing indecent acts

In areas where gangs are prevalent, older students may attempt to recruit younger students using any or all of the above methods. Young people suffering from sexual exploitation themselves may be forced to recruit other young people under threat of violence.

5.4 **Minimising the risk of safeguarding concerns towards students from other students**

We will provide a developmentally appropriate PSHE syllabus which develops students' understanding of acceptable behaviour and keeping themselves safe.

Have systems in place for any student to raise concerns with staff, knowing they will be listened to, believed and valued.

Deliver targeted work on assertiveness and keeping safe to those students identified as being at risk.

On occasion, some students will present a safeguarding risk to other students. The college should be informed that the young person raises safeguarding concerns, for example, they are coming back into college following a period in custody or they have experienced serious abuse themselves.

These students will need an individual risk assessment and risk reduction plan to ensure that other students are kept safe and they themselves are not laid open to malicious allegations. There is a need to balance the tension between privacy and safeguarding.

5.5 **What to do**



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The initial response to a report from a child is important. 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 abuse. Nor should a victim ever be made to feel ashamed for making a report.

If staff have a concern about a child or a child makes a report to them, they should follow the college's safeguarding referral process. As is always the case, if staff are in any doubt as to what to do they should speak to the designated safeguarding lead (or a deputy).

The Designated Safeguarding Lead should make a referral to the Front Door For Families, as appropriate. If the allegation indicates a potential criminal offence has taken place, the police should be contacted at the earliest opportunity and advice sought from them on appropriate follow-up in college. Unless other professional advise otherwise the college will inform parents (of both the student being complained about and the alleged victim).

6 **Children's Services Threshold Document**

- 6.1 The Children's Services Threshold Document has been developed so that everyone working with children in Brighton and Hove has a common language for understanding the needs and risks surrounding children and their families.
- 6.2 For example, if the college has concerns about a child and needs advice or support from the Front Door For Families, they will use the Threshold Document as a guide to understand the college's concerns and provide advice about what to do or to decide whether the child and family need social care involvement. The Threshold Document does not replace professional judgement, but it is intended to support decision-making and discussions between services and practitioners.
- 6.3 It is important that staff members are familiar with the Threshold Document, which can be accessed at <http://www.brightonandhovelscb.org.uk/professionals/whole-family-working-thresholds/#>
- 6.4 The Threshold Document shows that a child's or family's additional needs can be on a range from none to very high, and that needs can shift from early help to child protection and back to preventative early help. It covers children whose needs are increasing as well as children whose needs are decreasing after Children's Social Work Services involvement. The Threshold Document will help practitioners to identify the right level of support for the child in the least intrusive way while keeping the child safe.
- 6.5 The Threshold Document identifies four levels of need.

Level 1:

- children who are achieving expected outcomes
- their needs are met by their parents and by accessing universal services such as health and education
- they do not have additional needs

Level 2:

- children with additional needs



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- parents need professional support or guidance to help them meet their children's needs
- extra support can usually be provided by agencies that already know the family, e.g. their pre-college, college or college or NHS community services such as Health Visiting

Level 3:

- children with multiple and complex needs
- children and parents need targeted early help or specialist services to meet the children's needs
- needs are met through multi-agency support and the use of Early Help Plans

Level 4:

- children with acute needs, including those in need of protection
- children and parents need multi-agency responses which include specialist intervention from Children’s Social Work Services through the family assessment process

6.6 By referring to the Threshold Document, the college can identify when assessment and support for a child and family need 'stepping up' to a referral to Social Work Services and when the needs of a child and their family have been reduced enough for them to be 'stepped down' to early help services.

7 What Action To Take If You Have Concerns About A Child

Staff member	What action to take if you have concerns
Any member of staff, governor, volunteer, contractor or activity provider	<ul style="list-style-type: none"> • Discuss your concerns with the Designated Safeguarding Lead [Hannah Sapsford], or in their absence, with the Deputy Designated Safeguarding Lead (Uschi Schomig, Claudia Mersh), as soon as possible, before the child leaves for the day. It is important that the child is not sent home at the end of the day without taking the right protective action. • Complete the safeguarding incident / cause for concern form and pass it to the Designated Safeguarding Lead (or a deputy in their absence). • If the Designated Safeguarding Lead or their deputy is not available, you should contact the Front Door For Families / SPoA yourself. Inform the Designated Safeguarding Lead about what actions you have taken.
Designated Safeguarding	You are concerned that the child is at risk of significant harm (Level 4 Threshold Document)



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Lead or Deputy	<ul style="list-style-type: none"> • Contact the Front Door For Families immediately. • If you believe that the child is in immediate danger, or you suspect a crime has been committed, you must also contact the police immediately.
	<p>You believe the child is not at risk of significant harm, but the child or their family may need support</p> <p>(Level 2 or 3 Threshold Document)</p> <ul style="list-style-type: none"> • Use the Threshold Document to identify the level of need. • Discuss your concerns with senior colleagues in another agency, if necessary • If your consultation results in the decision that the child and family are in need of help at Level 2 or 3 of the Threshold Document, provide additional support in the college and/or refer the child or their family to other agencies providing early help services. • Record all your consultations and decision-making on the safeguarding incident / cause for concern form sent by the staff member who contacted you originally. Update the chronology and add referral letters and forms to the child's file; create a stand-alone file, if one does not exist. Continue to update the file, including the chronology, as work progresses.

8 Dealing With A Disclosure Made By A Child – Advice For All Members Of Staff

If a child discloses that he or she has been abused in some way, the member of staff or volunteer should follow this guidance.

- Listen to what is being said without displaying shock or disbelief.
- Only ask questions when necessary to clarify, and without suggesting what the answer might be.
- Accept what is being said.
- Allow the child to talk freely – do not put words in the child's mouth.
- Reassure the child that what has happened is not his or her fault.
- Do not make promises that you may not be able to keep.
- Do not promise confidentiality – it may be necessary to refer the child to Children's Social Care.
- Stress that it was the right thing to tell.
- Do not criticise the alleged perpetrator.
- Explain what has to be done next and who has to be told.



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- Inform the Designated Safeguarding Lead without delay.
- Complete the child protection incident/welfare concern form and pass it to the Designated Safeguarding Lead.
- Dealing with a disclosure from a child and safeguarding issues can be stressful. Consider seeking support for yourself and discuss this with the Designated Safeguarding Lead.

9 **Discussing Concerns with the Family and the Child – Advice for the DSL**

- 9.1 In general, you should always discuss any concerns the college may have with the child's parents. They need to know that you are worried about their child. However, you should not discuss your concerns if you believe that this would place the child at greater risk or lead to loss of evidence for a police investigation.
- 9.2 **If you make a decision not to discuss your concerns with the child's parents or carers** this must be recorded in the child's child protection file with a full explanation for your decision.
- 9.3 **It is important to consider the child's wishes and feelings**, if age appropriate, as part of planning what action to take in relation to concerns about their welfare.
- 9.4 When talking to children, you should take account of their age, understanding and preferred language, which may not be English. It is also important to consider how a disabled child may need support in communicating.
- 9.5 How you talk to a child will also depend on the substance and seriousness of the concerns. You may need to seek advice from the Front Door For Families or the police to ensure that neither the safety of the child nor any subsequent investigation is jeopardised.
- 9.6 If concerns have arisen as a result of information given by a child, it is important to reassure the child but not to promise confidentiality.
- 9.7 **It is expected that you discuss your concerns with the parents before making a referral to the Front Door For Families, unless you consider that this would place the child at increased risk of significant harm.**
- 9.8 Parents will ultimately be made aware of which organisation made the referral.

10 **Early Help for Children and Families**

- 10.1 Most parents can look after their children without the need of help other than from their family or friends. However, some parents may need additional help from our college or other services such as the NHS. Providing help early is more effective in promoting the welfare of children than reacting later.
- 10.2 Our college will work together with other agencies to provide a coordinated offer of early help, in line with *Working Together to Safeguard Children July 2018* and local guidance, to any child who needs it.
- 10.3 We will pool our knowledge within the college and with other agencies about which families or children need additional support in a range of ways so that we can work out



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how best to help them. We will use the Threshold Document to identify what level of need the child or their family has.

- 10.4 We will work closely with targeted early help services, via the Front Door For Families, and Children's Social Work Services if we feel families need more support and input, or children are at risk of harm, and we will continue to provide support if other services are also needed.
- 10.5 Early help support is accessed by making a referral to the Front Door For Families. Consent for this will need to be gained from the family first.
- 10.6 Our college will work with other services in early help planning and coordination of interventions to meet young peoples and families.

11 **Children's Services Responses to Concerns About A Child**

- 11.1 Once Children's Social Work Services has accepted our referral as needing a social-care-led response (Level 4 of the Threshold Document), a senior social work practitioner and their manager will evaluate the concerns to identify the sources and levels of risk and to agree what protective action may be necessary.
- 11.2 The evaluation of concerns and risks involve deciding whether:
 - the child needs immediate protection and urgent action is necessary; or
 - the child is suffering, or at risk of suffering, significant harm and enquiries need to be made under section 47 of the Children Act 1989; or
 - the child is in need and should be assessed under section 17 of the Children Act 1989.
- 11.3 We will cooperate with Children's Social Work Services and the police in any emergency action they take using their legal powers for immediate protection of the child. This may involve removing the child from their home.
- 11.4 We will participate in any multi-agency discussions (strategy discussions), if invited to do so, and share information about the child and their family to plan the response to concerns.
- 11.5 We will share information about the child and their family for section 47 enquiries and family assessments undertaken by Children's Social Work Services.
- 11.6 We will ensure that a relevant staff member participates in all initial and review child protection conferences, if we are invited to attend. The staff member will work together with other agencies to discuss the need for and agree to an outcome-focused child protection plan and will ensure that the child's wishes and views are considered in their own right in planning.
- 11.7 If we are members of the core group to implement a child protection plan, we will ensure a relevant staff member participates in all core group meetings.
- 11.8 We will ensure that we complete all actions allocated to us as part of the outcome-focused plan, whether a child protection plan or a family support plan, in a timely way.



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- 11.9 We will continue to monitor children once their plans are ended to ensure that they are supported and kept safe.
- 12 **Information Sharing and Consent**
- 12.1 It is essential that people working with children can confidently share information as part of their day-to-day work. This is necessary not only to safeguard and protect children from harm but also to work together to support families to improve outcomes for all.
- 12.2 The college may have to share information about parents or carers, such as their medical history, disability or substance misuse issues, for investigations of child abuse carried out by Children's Social Work Services.
- 12.3 We will proactively seek out information as well as sharing it. This means checking with other professionals whether they have information that helps us to be as well informed as possible when working to support children.
- 12.4 The Data Protection Act 1998 and the General Data Protection Regulation are not a barrier to sharing information. It is there to ensure that personal information is managed in a sensible way and that a balance is struck between a person's privacy and public protection.
- 12.5 We should be sharing any concerns we have with parents at an early stage, unless this would put a child at greater risk or compromise an investigation. Parents need to know what our responsibilities are for safeguarding and protecting children and that this involves sharing information about them with other professionals.
- 12.6 Be clear about the purpose of sharing confidential information and only share as much as you need to achieve your purpose.
- 12.7 Try to get consent from parents (or the child, if they have sufficient understanding) to share information, if possible. However, **you do not need consent if you have serious concerns about a child's safety and well-being.**
- 12.8 **Consent is not necessary** in cases where Children's Social Work Services are making child protection enquiries under section 47 of the Children Act 1989. Information needs to be shared with Children's Social Work Services; staff members must make sure to record what information has been shared.
- 12.9 **Consent is necessary** for:
- Children's Social Work Services investigations or assessments of concerns under section 17 of the Children Act 1989. Children's Social Care will assume that we have obtained consent from the parents to share information unless we make them aware that there is a specific issue about consent. This must be discussed with a social worker at the Front Door For Families.
 - Early Help Assessments. Assessments are undertaken with the agreement of the child and their parents or carers.
- 12.10 If you are in any doubt about the need for seeking consent, get advice from the Designated Safeguarding Lead.



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- 12.11 Keep a record of your decision to share information, with or without consent, and the reasons for it. Remember also that it is just as important to keep a record of why you decided not to share information as why you did so.

13 **Record Keeping**

- 13.1 Good record keeping is an important part of the college's accountability to children and their families and will help us in meeting our key responsibility to respond appropriately to welfare concerns about children.
- 13.2 Records should be factual, accurate, relevant, up to date and auditable. Where opinions are included this must be made clear. Where people are referred to they should be identified clearly by role. Records should support monitoring, risk assessment and planning for children and enable informed and timely decisions about appropriate action to take.
- 13.3 The Designated Safeguarding Lead will ensure that records are maintained appropriately for children with safeguarding concerns and that stand-alone files are created and maintained in line with requirements of the above guidance.

14 **Professional Challenge and Disagreements**

- 14.1 Working with children and families, and in particular child protection work, is stressful and complex, as well as involving uncertainty and strong feelings. To ensure that the best decisions are made for children, we need to be able to challenge one another's practice.
- 14.2 We will promote a culture within our college that enables all staff members to raise, without fear of repercussions, any concerns they may have about the management of child protection in the college. This may include raising concerns about decisions, action and inaction by colleagues about individual children. If necessary, staff members will speak with the Designated Safeguarding Lead, the head teacher, the chair of governors or with the Local Authority Education Safeguarding Officer.
- 14.3 Cooperation across agencies is crucial; professionals need to work together, using their skills and experience, to make a robust contribution to safeguarding children and promoting their welfare within the framework of discussions, meetings, conferences and case management.
- 14.4 If there are any professional disagreements with practitioners from other agencies, the Designated Safeguarding Lead or the head teacher will raise concerns with the relevant agency's safeguarding lead in line with guidance in the *Pan-Sussex Child Protection and Safeguarding Procedures*.
- 14.5 If the college disagrees with the child protection conference chair's decision, the Designated Safeguarding Lead or the head teacher will consider whether they wish to challenge it further and raise the matter with Children's Services Head of Safeguarding.



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15 Safer Recruitment

- 15.1 Our college has robust recruitment and vetting procedures to help prevent unsuitable people from working with children, which are in line with those stipulated within *Keeping Children Safe in Education: Statutory Guidance for colleges and Colleges, September 2018*
- 15.2 Our job advertisements and application packs make explicit reference to the college's commitment to safeguarding children, including compliance with disclosure and barring regulations and clear statements in the job description and person specification about the staff member's safeguarding responsibilities.
- 15.3 All staff members, including volunteers, who have contact with children, young people and families will have appropriate pre-employment checks in line with *Keeping Children Safe in Education: Statutory Guidance for colleges and Colleges, September 2018*
- 15.4 At least one member on every shortlisting and interview panel will have completed safer recruitment training.
- 15.5 The Designated Safeguarding Lead is responsible for ensuring that our **single central record of pre-employment checks** is accurate and up to date.