



# Safeguarding and Protection Policy

Last reviewed: September 2022

Signature: J Sharpe (Principal)

Signature: *H Sapsford* (Operations Manager)

## Noted changes to policy 2022 (highlighted in throughout document)

- In line with the KCSIE 2022 the term "child-on-child abuse" rather than "peer-on-peer abuse" is used throughout the updated policy.
- Addition of the Board of Directors to 3. Roles and Responsibilities section.
- Updated reporting procedures and platform.
- Additional guidance regarding disclosures.

## Introduction

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.

All staff and students at Dv8 understand that

"Safeguarding children is everyone's responsibility"

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## 1. KEY CONTACTS

Role	Name	Contact details
Designated Safeguarding Lead & Prevent Officer (Brighton & Bexhill)	Hannah Sapsford <i>Operations Manager</i>	01273 550432 01424 213890 07543 722196
Deputy Designated Safeguarding Leads	Nicola Lombardo	01273 550432

(Brighton & Bexhill)	<i>Student Experience Manager</i> Jim Sharpe <i>Principal</i>	
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#### Local Authority Contacts for Child Protection And Safeguarding

Local Authority Designated Officer - LADO (Staff allegations only)	Brighton & Hove - Darrel Clews Darrel.clews@brighton-hove.gov.uk	01273 295643
	East Sussex – Sam Efde Sam.efde@eastsussex.gov.uk	01323 466606 07958 662072
	West Sussex - Miriam Williams /Donna Tomlinson Miriam.williams@westsussex.gov.uk Donna.tomlinson@westsussex.gov.uk	03302 223339
Children's Social Care – for all referrals	Brighton & Hove City Council <i>Front Door for Families</i> <i>Phone:</i> 01273 290400 <i>Email:</i> <a href="mailto:FrontDoorforFamilies@brighton-hove.gov.uk">FrontDoorforFamilies@brighton-hove.gov.uk</a>	01273 290400 (Out Of Hours Duty Service 01273 335905)
	East Sussex County Council <i>Single Point of Advice (SPoA)</i> <i>Mon-Thurs 8.30am-5pm and Fri 8.30am-4.30pm.</i> <i>Phone:</i> 01323 464222 <i>Email:</i> <a href="mailto:0-19.SPOA@eastsussex.gov.uk">0-19.SPOA@eastsussex.gov.uk</a>	01323 464222 (Out Of Hours Duty Service 01273 335906/ 01273 335905)
	West Sussex County Council <i>West-Sussex's Integrated Front Door</i> Monday to Friday between 9am-5pm <i>Phone:</i> 01403 229900 <i>Email:</i> <a href="mailto:WSchildrenservices@westsussex.gov.uk">WSchildrenservices@westsussex.gov.uk</a> <i>Referrals via the online form</i> <a href="https://www.westsussex.gov.uk/education-children-and-families/keeping-children-safe/raise-a-concern-about-a-/">https://www.westsussex.gov.uk/education-children-and-families/keeping-children-safe/raise-a-concern-about-a-/</a>	01403 229900  Out of hours' emergency team: 0330 222 6664

## 2. SAFEGUARDING AND CHILD PROTECTION POLICY

This policy is in place to protect all children and young people who attend Dv8 Sussex. 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.
- Ensure that wherever appropriate every effort will be made to establish effective working relationships with parents and/or colleagues from partner agencies.

## 2.1 The Legal Framework

This policy and the accompanying procedures have been developed in accordance with local and national statutory and non-statutory guidance including:

- *Children's Act 1989*
- *United Convention of the Rights of the 1991*
- *Data Protection Act 1998*
- *Human Rights Act 1998*
- *Sexual offences Act 2003*
- *Children Act 2004*
- *Safeguarding Vulnerable Groups Act 2006*
- *Protection of Freedoms Act 2012*
- *Children and Families Act 2014*
- *Special Educational Needs and Disability (SEND) code of practice 0-25 yrs. – HM Government 2014*
- *Information Sharing Advice for practitioners providing safeguarding services to children, young people and parents and carers HM Government 2015*
- *Working Together to Safeguard children HM Government 2015; revised 2018*
- *Keeping children safe in Education: Statutory guidance for schools and colleges Revised Sept 2022*
- *Working Together to Safeguard children: A Guide to Inter-Agency Working to Safeguard and Promote the Welfare of children, July 2018*
- *Pan-Sussex Protection and Safeguarding Procedures*

**Keeping children Safe in Education 2022** states that all college staff working directly with children MUST read at least part 1 of the KSCIE guidance. Staff who do not work directly with children should read Part 1 or Annex A of the guidance.

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.

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.

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".

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.

### 3. ROLES AND RESPONSIBILITIES

All Dv8 Sussex staff, Board of Directors, and volunteers have a duty to safeguard children and young people who come into contact with the organisation, and to respond to any concerns they may have regarding physical, sexual, or emotional, abuse or neglect as well as awareness and response to issues of self-harm, radicalisation (PREVENT), criminal or sexual exploitation, forced marriage, honour-based abuse or female genital mutilation.

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.

#### 3.1 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 times across all centres.

- 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 is maintained and fully compliant
- 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 to the Board of Directors.
- The DSL is responsible for ensuring that all appropriate safeguarding training is made available to all staff.

#### 3.2 Deputy Safeguarding Leads

It is the role of the Deputy Safeguarding Leads across 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 deputies or pastoral/wellbeing leads, or 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.

#### 3.3 Senior Leadership Team

The Dv8 Senior Leadership Team is 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.

### 3.4 Board of Directors

As stipulated in KCSIE 2022, Governing bodies, such as the board of Directors, have a strategic leadership responsibility for their school's or college's safeguarding arrangements and must ensure that they comply with their duties under legislation. They must have regard to the KCSIE 2022 guidance, ensuring policies, procedures and training in their schools or colleges are effective and comply with the law at all times. Governing bodies should have a senior board level (or equivalent) lead to take leadership responsibility for their college's safeguarding arrangements. Governing bodies should ensure that all governors and trustees receive appropriate safeguarding and child protection (including online) training at induction. Their training should be regularly updated. Governing bodies should be aware of their obligations under the Human Rights Act 1998, the Equality Act 2010, (including the Public Sector Equality Duty), and their local multi-agency safeguarding arrangements.

### 3.5 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 Team, Attendance and Intervention Officers, Head of TLA (Curriculum and Quality), Principal (Organisational Mission, Vision, Values) and Finance /HR (Contract, Employment Handbook).

Line Managers will ensure that their staff have all attended Safeguarding training and completed the online training within the first month of starting employment and will ensure 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.

### 3.6 All Dv8 staff

All staff at Dv8 are responsible for ensuring that their own conduct at work is always appropriate and within policy guidelines. *Staff Code of Conduct policy* will be clearly displayed in all Dv8 centres. All staff are responsible for identifying concerns and passing them on to the Designated Safeguarding Lead at Dv8. If any staff has concerns about the suitability of any staff member or volunteer to work alongside young people, this should be raised with the DSL immediately.

Staff are also expected to be responsible for recording concerns and Safeguarding information as per the Dv8 Safeguarding system (MyConcern).

Dv8 Staff should also be aware of the systems within the college which support safeguarding, these are to be explained at induction to new staff. This includes.

- Safeguarding and Child Protection Policy
- Behaviour Policy
- Staff Code of Conduct
- Safeguarding response to children who go missing from education
- Role of the Designated Safeguard Lead

### 3.7 Visitors and Guest speakers

All external speakers to Dv8 will automatically be vetted 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 visitors

will be required to sign in and out of the building and will have to always wear a visible ID badge whilst in the centre.

### 3.8 Dv8 Safeguarding Panel

#### Aims & Objectives

1. To meet regularly according to need but no less than every half term to review learning points for 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.
4. To be an open and supportive forum that focuses on all elements of safeguarding, 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.

### 4. PROTECTION PROCEDURES

Any and all issues of concern about any students must be identified and recorded.

Dv8 follows the 5'R's process

1. **Recognise** - staff are aware and mindful of possible signs of concern / abuse
2. **Respond** - staff do not ignore a concern, staff respond with compassion and care.
3. **Report** - Staff speak to the DSL or Deputy DSL as soon as possible
4. **Record** - staff log a report on MyConcern
5. **Refer** - DSL or deputy will refer unless they are not available and then staff may make an onward referral to relevant service

#### When to Act:

DV8 has a single streamlined system for reporting issues of concern. Staff need to use this system if they:

A: See or hear something that concerns them

or

B: Receive a disclosure from a student

or

C: Receive a disclosure from a 3rd party - eg. another student, parent

All reports for pastoral and safeguarding concerns should be sent through the MyConcern platform. All staff members are set up as basic users, some staff has trusted user status, meaning they can be assigned cases to process. All staff will receive training guides on how to use this system.



Please find here the triage flowchart, key persons and reporting flowchart.

[Safeguarding Reporting Flowchart](#)

[Safeguarding Reporting Key Persons](#)

[Safeguarding Reporting Triage](#)

Staff must complete this form themselves and not pass information onto others to complete on their behalf.

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.

Throughout these procedures is an emphasis on confidentiality and gaining consent to share information about sensitive issues. This is important and in line with best practice and government guidelines.

Please see this [information sharing flowchart](#) for further clarification.

Further guidance and information is included in Appendix A of this policy.

#### 4.1 What Action to Take If You Have Concerns About A Child/ Young Person

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"> <li>● Discuss your concerns with the Designated Safeguarding Lead, or in their absence, with the Deputy Designated Safeguarding Lead, <b>as soon as possible, before the young person leaves for the day.</b> It is important that the is not sent home at the end of the day without taking the right protective action.</li> <li>● Complete a <b>MyConcern</b> report and pass it to the Designated Safeguarding Lead (or a deputy in their absence).</li> <li>● If the Designated Safeguarding Lead or their deputies are not available, you should contact the FDFF/ SPoA yourself. Inform the Designated Safeguarding Lead about what actions you have taken.</li> </ul>
Designated Safeguarding Lead or Deputy	<p>You are concerned that the is at risk of significant harm (Level 4 Threshold Document)</p> <ul style="list-style-type: none"> <li>● Contact the FDFF/ SPoA immediately.</li> <li>● If you believe that the is in immediate danger, or you suspect a crime has been committed, you must also contact the police immediately.</li> </ul>
	<p>You believe the is not at risk of significant harm, but they or their family may need support (Level 2 or 3 Threshold Document)</p> <ul style="list-style-type: none"> <li>● Use the Threshold Document to identify the level of need.</li> </ul>

	<ul style="list-style-type: none"> <li>● Discuss your concerns with senior colleagues in another agency, if necessary</li> <li>● If your consultation results in the decision that the young person and their 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 young person or their family to other agencies providing <b>early help services</b></li> <li>● Record all your consultations and decision-making on the <b>MyConcern report</b> sent by the staff member who contacted you originally. Update the chronology and add referral letters and forms to the young persons' file (These are digital files held on the MyConcern platform). Continue to update the file, including the chronology, as work progresses.</li> </ul>
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#### 4.2 Dealing with A Disclosure Made by A Young Person– Advice for All Members of Staff

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

- Understand that the young person may not feel ready or know how to tell someone – you may be the first person they have spoken to
- 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 young person to talk freely – do not put words in the 's mouth.
- Reassure the young person 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 young person 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.
- Inform the Designated Safeguarding Lead without delay.
- Complete the protection incident/welfare concern form and pass it to the Designated Safeguarding Lead.
- Dealing with a disclosure from a and safeguarding issues can be stressful. Consider seeking support for yourself and discuss this with the Designated Safeguarding Lead.

If a young person discloses that they have been a victim of sexual harassment, abuse or violence in line with the KCSIE 2022 recommends that:

- All staff should be able to reassure victims of such abuse that they are being taken seriously and that they will be supported and kept safe.
- The young person should never be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment.

- The young person should never be made to feel ashamed for making a report.

## 5. SAFE STAFFING

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 aim to:

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

Support for any staff member who has had to deal with a distressing safeguarding disclosure / incident or situation 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.

Support can also be sought through the Education Support helpline: 08000 562561.

### 5.1 Safer Recruitment

All staff and volunteers working at any Dv8 site will be recruited safely in line with the Dv8 Safer Recruitment policy.

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

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.

### 5.2 Staff Code 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 Dv8 staffs role is **not** to be the student's friends or confidantes and correct protocol and procedures must be followed in all contact made with students at Dv8.

Staff members and volunteers should never give students any personal details such as personal phone number, personal email address, or home address. All staff should follow the Dv8 Code of conduct for staff at all times.

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.

Related procedures: [Professional Code of Conduct](#)

### 5.3 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.

### 5.4 Staff Training

All staff and volunteers working with children and young people, or vulnerable adults will undergo mandatory introductory Safeguarding and Child protection online training followed by annual refresher and specialist CPD opportunities throughout the year.

This training will include:

- Basic definitions of abuse
- Signs and indicators of abuse
- Behaviour of abusers
- What to do if someone tells you they are being abused/at risk
- What to do if you suspect abuse/significant harm
- Mandatory Prevent agenda training
- Mandatory training for
- All DSL at Dv8 will have completed recognised Designated Safeguarding Lead Officer training and *Local Safeguarding children's Partnership* 3 day 'Working Together' multi-agency training.
- Dv8 also provides staff with access to a comprehensive resource hub, with up-to-date guidance on safeguarding and child protection good practice and CPD opportunities around safeguarding and pastoral issues.
  - It is the responsibility of the Designated and Deputies Safeguarding Lead to keep this up-to-date.

## 6. CONFIDENTIALITY

Confidential information relating to a Child Protection cases 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.

- 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.

Related policies: [Data Protection and Confidentiality Policy](#)

## 7. HEALTH AND SAFETY

All staff have a duty to take reasonable care of 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.

## 8. 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 employee handbook procedures.

Related procedures: Employee handbook

## 9. PREVENT - 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 care, 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 an 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.

The Prevent Coordinator for the South East is Alamgir Sheriyar.

### 9.1 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.

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

Sharing with colleagues:

- 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 care providers [here](#).

- All staff will complete the online ETF Prevent training as part of staff induction and refresher training annually.
- Staff leading on the prevent agenda have all attended 'prevent strategy' training from the local authority.
- Annual self-assessment for Prevent is carried out annually and shared with senior managers and the South East Prevent Coordinator.

## 10. 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/ shared with other agencies

All concerns are submitted and updated securely on the MyConcern platform. Concerns assessed to be of high priority and set at a risk level of High will be brought to the twice weekly safeguarding panel meetings.

Any hard copies of safeguarding 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. The majority of files however will be held securely on MyConcern with access restricted to relevant staff members only.

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 lead if this is deemed to be in the student's best interests.

An overview of safeguarding issues and incidents at Dv8 will be shared with the Board of Directors at every meeting. These will be figures only to maintain the confidentiality of students concerned. Reporting will also cover any PREVENT referrals or concerns.

## 11. 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. 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.

## 12. WORK EXPERIENCE PLACEMENTS

For students undertaking work experience off site Dv8 will conduct a Safeguarding and safety audit and suitability vetting of the provider prior to sending students on placement.

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 students who are on work placement as to action they should take if they have any concerns about their placement.

It will be recognised as good practice to have similar checks for all employers working with Dv8 students.

## 13. ONLINE SAFETY

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. Please see Dv8's *Online Safety Policy* and the separate guidance document '*Delivering online/remote learning safely*' for full guidance about safeguarding on digital platforms.

## 14. RISK ASSESSMENTS

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 Manager or the Head of Curriculum.

Failure by staff to adequately prepare for and risk assess any trips or visits may lead to disciplinary action under the disciplinary procedure.

Additionally, any students with medical considerations or social, emotional and mental health barriers will be risk assessed in order to ensure correct support is put in place. Information regarding these assessments will be shared with relevant staff and tutors on a need-to-know basis for the benefit of the learner.

## 14.1 Supporting students at risk

Dv8 recognises that children and young people who have experienced neglect, abuse or who witness violence may find it difficult to develop a sense of self-worth or view the world as a positive place. In some circumstances it may be necessary to undertake a risk assessment for individual students to ensure that their time at Dv8 is safe and that all pupils and staff are kept safe whilst at the Dv8 centres.

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:

- The curriculum to encourage self-esteem and self-motivation as well as raising awareness of risks from exploitation and radicalisation.
- 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.
- The implementation of Dv8's Behaviour Management policies.
- 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.
- Regular liaison with other professionals and agencies that support students and their families.
- A commitment to develop productive, supportive relationships with parents and carers, whenever it is in the student's best interest to do so.
- The development and support of a responsive and knowledgeable staff group, trained to respond appropriately in safeguarding situations.
- 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.
- 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.

## 15. ALLEGATIONS AGAINST STAFF

Any allegation made against a member of staff, volunteer, or trustee, whether by a child, parent, service user, colleague or anybody else will be treated with the utmost seriousness and responded to immediately by the Dv8 Principal. This will apply regardless of whether the allegation relates to actions within a work or personal context. Full, written details, signed and dated by the person making the allegation must be provided to the Principal.

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 Principal 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 of 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.

Where Dv8 takes action to terminate its relationship with a member of staff, volunteer, or trustee for behaviour or actions which harmed or could have harmed a or young person we will refer their name to the Disclosure and Barring Scheme for consideration of inclusion on the



barred persons list, in line with current guidance. Inclusion in this list disqualifies individuals from working or seeking work with adults at risk and/or children and young people.

## 16. POLICY REVIEW

The Dv8 Designated Safeguarding lead is responsible for ensuring the annual review of this policy. Previous versions of the policy are to be kept demonstrating progress and developments made.

### 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 18<sup>th</sup> 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/her 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 or mental health. It may involve:
  - 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**

**Sexual abuse** covers a broad range of harmful behaviours, and it is important that all staff, students and parents understand, recognise and can name the different harmful sexual behaviours:

**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.

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

**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.

**Harmful sexual behaviour** - 'experimentation that unintentionally goes too far, through to serious sexual assault' (*Stop it Now!*)

**Sexual violence:** Sexual offences under the Sexual Offences Act 2003. This includes rape, assault by penetration, sexual assault, causing someone to engage in sexual activity without consent.

**Sexual assault:** 'A person (A) commits an offence if: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents.'

A child under the age of 13 can never consent to any sexual activity'.

**Sexual harassment:** 'sexual harassment is likely to: violate a child's dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment.' (Dfe, 2021) 'Unwanted or unwelcome behaviour of a sexual nature that interferes with your right to receive an equal educational opportunity' (Stein, 1999).

**Bullying** - 'the repetitive, intentional hurting of one person or group by another person or group, where the relationship involves an imbalance of power' (*Anti-Bullying Alliance*)

### 3 Specific Safeguarding Issues

3.1 Dv8 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' abuse- 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 – sharing of nudes/semi nudes images or videos (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
Children with family members in prison
Child sexual exploitation
Child criminal exploitation: county lines
Domestic abuse
Homelessness
So-called 'honour-based' abuse
Preventing radicalisation
Peer on peer abuse
Sexual violence and sexual harassment between children in colleges

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

3.5 Brighton & Hove Local Safeguarding Children's Partnership has additional information and guidance on some of these issues at:

<https://www.bhscp.org.uk/preventing-abuse-and-neglect/keeping-children-safe/?highlight-specific%20safeguarding%20issues>

East Sussex Local Safeguarding Children's Partnership has additional information and guidance on some of these issues at:

### 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. sexual exploitation does not always involve physical contact: it can also occur using 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;
- 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;
- 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 '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 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, 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 lead (or a deputy) should ensure appropriate referrals are made based on the '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 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 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](http://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.

### 3.13 Further Information on Sharing of nudes/semi nudes images or videos

Requesting and sending of nude images among children and young people can be a common occurrence, where they often describe these incidents as 'mundane'. Children involved in such 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](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)

### 3.14 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 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 stepparent (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 several reasons such as parental ill health, a parent going abroad or into 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.

#### Recognition – What To Look For

3.15 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.

3.16 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

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

- persistently avoid health services and treatment of the 's illnesses
- have unrealistic expectations of the
- frequently complain about or to the child and fail to provide attention or praise
- be absent
- be misusing substances
- persistently refuse to allow access on home visits by professionals
- be involved in domestic violence and abuse
- be socially isolated

3.18 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.

3.19 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

#### 4 Peer on Peer Abuse – Managing Allegations of Abuse Made Against Other children

4.1 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.

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

#### 4.3 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.

#### 4.4 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.

#### 4.5 What to do

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 and if appropriate, SHAV Procedure. 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 or Single Point of Access, 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 professionals advise otherwise the college will inform parents (of both the student being complained about and the alleged victim).

## 5 Children's Services Threshold Document

5.1 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.

5.2 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.

5.3 It is important that staff members are familiar with the Threshold Document, which can be accessed at <https://www.brightonandhovesafeguarding.org.uk/threshold-framework/> or <https://www.eastsussex.gov.uk/children-families/professional-resources/continuum-of-need/about>.

or downloadable poster <https://www.bhscp.org.uk/wp-content/uploads/sites/3/2019/11/Threshold-Framework-Poster-a3.pdf>

5.4 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.

5.5 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
- 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

5.6 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.

#### Discussing Concerns with the Family and the Child– Advice for the DSL

5.7 In general, you should always discuss any concerns the college may have with the '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.

5.8 **If you make a decision not to discuss your concerns with the 's parents or carers** this must be recorded in the child's protection file with a full explanation for your decision.

5.9 **It is important to consider the 's wishes and feelings**, if age appropriate, as part of planning what action to take in relation to concerns about their welfare.

5.10 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.

5.11 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/ SPOA or the police to ensure that neither the safety of the child nor any subsequent investigation is jeopardised.

5.12 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.

5.13 **It is expected that you discuss your concerns with the parents before making a referral to the Front Door For Families or SPOA, unless you consider that this would place the child at increased risk of significant harm.**

5.14 Parents will ultimately be made aware of which organisation made the referral.

## 6 Early Help for children and Families

6.1 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.

6.2 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.

- 6.3 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 how best to help them. We will use the Threshold Document to identify what level of need the child or their family has.
- 6.4 We will work closely with targeted early help services, via the Front Door For Families/ SPOA, 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.
- 6.5 Early help support is accessed by making a referral to the Front Door For Families/ SPOA. Consent for this will need to be gained from the family first.
- 6.6 Our college will work with other services in early help planning and coordination of interventions to meet young peoples and families.

## 7 Children's Services Responses to Concerns About Abuse

- 7.1 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.
- 7.2 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.
- 7.3 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.
- 7.4 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.
- 7.5 We will share information about the child and their family for section 47 enquiries and family assessments undertaken by children's Social Work Services.
- 7.6 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 's wishes and views are considered in their own right in planning.
- 7.7 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.
- 7.8 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.
- 7.9 We will continue to monitor children once their plans are ended to ensure that they are supported and kept safe.

## 8 Information Sharing and Consent

- 8.1 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.
- 8.2 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.
- 8.3 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.
- 8.4 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.
- 8.5 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.
- 8.6 Be clear about the purpose of sharing confidential information and only share as much as you need to achieve your purpose.
- 8.7 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.**
- 8.8 **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.
- 8.9 **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/ SPOA.
  - Early Help Assessments. Assessments are undertaken with the agreement of the child and their parents or carers.
- 8.10 If you are in any doubt about the need for seeking consent, get advice from the Designated Safeguarding Lead.
- 8.11 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.
- 9 **Record Keeping**
- 9.1 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.
- 9.2 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.

- 9.3 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.

## 10 Professional Challenge and Disagreements

- 10.1 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.
- 10.2 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 Principal, the chair of governors or with the Local Authority Education Safeguarding Officer.
- 10.3 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.
- 10.4 If there are any professional disagreements with practitioners from other agencies, the Designated Safeguarding Lead or the Principal will raise concerns with the relevant agency's safeguarding lead in line with guidance in the *Pan-Sussex Child Protection and Safeguarding Procedures*.
- 10.5 If the college disagrees with the child protection conference chair's decision, the Designated Safeguarding Lead or the Principal will consider whether they wish to challenge it further and raise the matter with the children's Services Head of Safeguarding.
- ## 11 Safer Recruitment - See Dv8 Safer Recruitment Policy
- 11.1 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*
- 11.2 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.
- 11.3 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*
- 11.4 At least one member on every shortlisting and interview panel will have completed safer recruitment training.
- 11.5 The Designated Safeguarding Lead is responsible for ensuring that our **single central record of pre-employment checks** is accurate and up to date.