Safeguarding Policy and Procedure 2023/24

"Saying nothing is not an option"

"Don't assume someone else has raised the concern or reported it"

"It can happen here"

Safeguarding procedure contents

The procedure has referenced and reflects the following external guidance documents:

- Department for Education *Keeping Children Safe in Education; Statutory Guidance for Schools* and *Colleges (September 2023)*
- *Mental Health and Behaviour in Schools (2021)*
- *Ofsted review of sexual abuse in schools and colleges (2020)*
- Department for Education *Child Sexual Exploitation. Definition and guide for practitioners, local leaders and decision makers working to protect children from child sexual exploitation (Feb 2017)*
- *Counter Terrorism and Security Act 2015 and revised 2018*
- *Prevent duty guidance for further education institutions in England and Wales (Updated 2021)*
- *Working Together to Safeguard Children 2017*
- *Criminal Exploitation of Children and vulnerable adults: county line guidance (2017)*
- *Putting Children First (July 2016)*
- *Preventing youth violence and gang involvement (2013)*
- *Protection of Freedoms Act 2012*
- *Safeguarding Vulnerable Groups Act 2006*
- *Children Act 1989 and 2004*
- *Education Act 2002*

Key personnel Safeguarding Team:

Designated Safeguarding Lead (Senior DSL) – Jaye Crew (QTLP & Teaching Delivery Manager) *

IAF Mentor (Deputy DSL) –

Safeguarding link trustee– Alex Peace-Gadsby

*carries operational responsibility for responding to safeguarding referrals.

Linked documents

This policy and procedure should be read in conjunction with the following IAF policies and procedures:

Harassment and bullying statement of intent (students) – attached at appendix 2
Online safety policy – attached at appendix 3
Procedures for dealing with allegations of sexual violence and harassment – attached at appendix 1
Staff code of conduct
Behaviour management policy and procedure including student code of conduct.
IT acceptable use policy
Social media guidelines (staff)

Introduction

1. Within various pieces of legislation a child is defined as "everyone under age 18", similarly an adult at risk is a person over the age of 18 years who may be unable to protect themselves from abuse, harm or exploitation, which may be by reason of illness, age, mental illness, disability or other types of physical or mental impairment.

2. IAF's procedures are compliant with legislation related to safeguarding and are updated on an annual basis to ensure that they continue to meet requirements as set out in Keeping Children Safe in Education (KCSiE) and Working Together to safeguard children.

3. These procedures apply to all children and adults at risk who are suspected of being, or have been, abused or at risk of abuse. They also apply to students of all ages at risk of being drawn into extremist activity. This includes all students working with IAF, and for staff employed at the College under the age of 18.

4. Safeguarding and promoting the welfare of children is defined in KCSiE as:
    *   protecting children from maltreatment;
    *   preventing the impairment of children's mental and physical health or 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.

5. In the document *Putting children first (July 2016)* the Government set out its ambitions to support vulnerable children to lead a safe and positive life, to become successful adults and to have the kind of happy childhood that we all want for our children. Help and protection should be provided in a timely, enduring and flexible manner, and be the best it can be. This requires children, parents and carers affected by abuse to feel part of the solution and confident that they will be believed. Practitioners should work together to reduce the immediate risk of harm and collaborate to develop long term strategies to improve children's and young people's life chances.

6. The Human Rights Act 1998 sets out fundamental rights and freedoms that everyone in the UK is entitled to. Under this Act it is unlawful for colleges to act in a way that is incompatible with the Convention, specific convention rights that apply are: the right to freedom from inhuman and degrading treatment; the right to respect for private and family life; that all rights and freedoms within the Act are applied without discrimination; and the right to education. Being subjected to harassment, violence and/or abuse, including that of a sexual nature, may breach any of all of these rights, depending on the nature of the conduct and the circumstances.

7. The primary responsibility for the protection of children rests with the parent(s)/carer(s). All agencies have the responsibility for the prevention, identification and reporting of child abuse. The Local Authority Children's Social Care Services has a main statutory duty to investigate alleged or suspected child abuse under Section 47 of The Children Act 1989 and also to provide appropriate support and child care services.

8. It is not the IAF's responsibility to investigate abuse. Nevertheless, it has a duty to act if there is cause for concern and to notify the appropriate agencies so that they can investigate and take necessary action.

9. The Inspire and Achieve Foundation takes a whole charity approach to safeguarding and is committed to working with the Local Safeguarding Partners and to complying with their procedures. IAF recognises that it has a responsibility towards children to safeguard and promote their welfare and to take appropriate decisions about how this can be achieved. IAF has a responsibility to discuss any concerns they have with the family or carer in question, and where possible seek their agreement to making a referral to the relevant social care referral point (MASH for Nottinghamshire and Starting Point for Derbyshire) or the Early Help Team. However, such discussions or agreement should not be sought if to do so would:

    - place a child at increased risk of significant harm
    - interfere with criminal enquiries
    - raise concerns about the safety of staff members

10. The Senior DSL, Mentoring Manager and any other deputies are likely to have a complete picture in relation to safeguarding and are therefore the most appropriate people to advice on responses to safeguarding concerns or safeguarding issues more broadly.

11. IAF at any time has young people on work placement, IAF will ensure that the principles and procedures enshrined within this document are applied to students on work placement or volunteering with local employers. IAF will work with employers to ensure they understand their responsibilities for safeguarding young people whilst in their business and for reporting any concerns they may have through IAF's procedures.

12. IAF's duties under the Counter Terrorism and Security Act 2015 (revised 2018) state that specified authorities have to have due regard to 'preventing people from being drawn into terrorism'. All agencies have a responsibility for the reporting of, protection from and prevention of people being radicalised.

13. IAF is committed to working proactively with the DFE regional Prevent coordinators, the Police Prevent Team and local Channel Chairs.

Safeguarding – what all staff need to know

14. IAF operates within a whole charity safeguarding culture where we work on the principle that 'it could happen here'. All staff must exercise appropriate professional curiosity in understanding changes in behaviour and attitude that may indicate that a young person is at risk of harm. All staff must act in the best interests of students and their safety at all times.

15. Enshrined within legislation around safeguarding is the principle that all concerns raised by young people and vulnerable adults should be listened to and taken seriously, as such IAF operates on a policy of open engagement with students – we will all take concerns seriously and take the necessary steps to ensure that we can respond to those concerns in the most appropriate way. Internally, IAF will work along the principles of working together to safeguard children, sharing information appropriately with colleagues is an essential part of our

safeguarding obligations and will enable us to gain a holistic picture of potential risk and vulnerabilities.

16. All staff should be aware that students may not feel ready or know how to tell someone that they are being harmed, abused, exploited or neglected and may not necessarily recognise their experience as harmful. Staff should exercise professional curiosity when working with students, this includes accepting that the 'worst can happen' and seeking advice from the safeguarding team when needed. Staff should build trusting relationships with students that may eventually help them to share their experiences.

17. All IAF staff should be able to identify young people who might benefit from Early Help and should be particularly alert to the potential need for early help for a young person who:

- is disabled or has certain health conditions and has specific additional needs
- has special educational needs whether or not they have an education health and care plan;
- has a mental health need
- is a young carer;
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines
- is frequently missing/goes missing from home or from care;
- is at risk of modern slavery, trafficking, sexual or criminal exploitation
- is at risk of being radicalised or exploited
- has a family member in prison, or is affected by parental offending
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- is misusing alcohol and other drugs themselves
- has returned home to their family from care
- is at risk of so-called 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage
- is a privately fostered child, or
- is persistently absent from education, including persistent absences for part of the school day.

18. Staff should seek advice and guidance from IAF designated safeguarding leads in the first instance for young people and adults who they feel may benefit from early help.

19. Staff should have an understanding of the cohort of students who have or have had in the recent past a social worker and should have an understanding of their academic progress, attainment and should have as high aspirations for these students as they do for their peers. The Senior DSL carries cross charity responsibility for ensuring our most vulnerable students, including those with a social worker, are provided with the support and adjustments necessary to ensure they can reach their potential and realise their ambitions.

20. Where students need a social worker, this may indicate heightened safeguarding risks. A young person's experience of adversity and trauma can leave them vulnerable to further harm as well as facing barriers to attendance, learning, behaviour and mental health. All staff should inform senior designated safeguarding lead of students that have a social worker, whether or not they are placed on a formal plan for protection. We will work closely with the social care team to promote and protect the best interests of that student.

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21. All staff should have the skills knowledge and understanding to keep previously looked after children safe. A previously looked after child potentially remains vulnerable. IAF will work proactively with other agencies to take prompt action where necessary to safeguard these young people and vulnerable adults.

22. All staff should be aware being absent from education for prolonged periods and/or on repeat occasions can act as a vital warning sign to a range of safeguarding issues including neglect, child sexual and child criminal exploitation - particularly county lines. It is important IAF's response to persistently absent pupils and children missing education supports identifying such abuse, and in the case of absent students, helps prevent the risk of them becoming a child missing education in the future. This includes when problems are first emerging but also where children are already known to local authority children's social care and need a social worker (such as a child who is a child in need or who has a child protection plan, or is a looked after child), where being absent from education may increase known safeguarding risks within the family or in the community. It is the responsibility of **all staff** to report concerns of non-attendance/no contact to Senior DSL as soon as they emerge.

23. All staff should be aware of 'contextual safeguarding' that is an awareness that safeguarding incident can be associated with factors outside the family home, school or college environment. All staff and designated personnel within IAF should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harm takes a variety of different forms and children can be vulnerable to multiple harms including sexual exploitation, criminal exploitation and serious youth violence. In this context it is important that staff provide as much information as possible when making a referral to social care or other agencies.

24. All staff should have an awareness of issues that can put children at risk of harm. Behaviours linked to issues such as drug taking, alcohol abuse, deliberately missing education and the consensual and non-consensual sharing of nudes or semi-nudes images/videos can be signs that a young person is at risk.

25. Staff should be alert to the particular vulnerability of students with learning difficulties/ disabilities. They are more likely to be isolated physically, geographically and socially and to experience feelings of rejection because of this. They are less likely to use mainstream facilities and resources and they are more likely to have communication difficulties. Students with learning difficulties/disabilities may suffer more severely from having little confidence and low self-esteem. There exists the potential for exploitation by more able peers and the misinterpretation of the nature of behaviour between young people themselves. Staff should take extra care when dealing with students with learning difficulties/disabilities. Do not assume that indicators of possible abuse such as behaviour, mood and injury relate to the student's disability without further exploration. Students may come to IAF with an Education, Health and Care Plan (EHCP) in some cases the EHCP might detail factors that make a student inherently more vulnerable to safeguarding concerns and as such factors should be discussed with the DSL.

26. The fact that a young person is LGBT is not in itself a safeguarding issue, however, LGBT young people can be targeted by their peers. Risks can be compounded where young people do not have a trusted adult with whom they can open up to. It is therefore vital that staff endeavour to reduce the additional barriers faced and provide a safe space for them to speak out about any

concerns and be themselves whilst with IAF. As with all other forms of bullying and child on child abuse IAF operates a zero tolerance policy.

27. Staff should be alert to the signs of child sexual exploitation (CSE) and child criminal exploitation (CCE) which is likely to affect students at IAF and which is often not disclosed by students themselves. The hidden nature of CSE or CCE exploitation and the complexities involved means that professional curiosity and always being alert to the issue is vital. Both CSE and CCE are forms of abuse and are defined as: "a form of child 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 or criminal activity a) in exchange for something the victim needs or wants, and/or b) for financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. The abuse can be perpetrated by individuals, 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 or complex, organised abuse. The victim may have been exploited even if activity appears consensual. Exploitation does not always involve physical contact; it can also occur through the use of technology. CSE and CCE can affect both males and females and can include children moved (trafficking) for the purposes of exploitation.

28. Staff should be aware of the indicators which may signal that children are at risk from or involved with serious violent crime. These may include increased absence, a change in friendships or friendship groups, significant decline in performance, signs of self-harm, or signs of assault or unexplained injury. Staff should also be aware of the range of risk factors which increase the likelihood of involvement with serious crime such as: being male; having been frequently excluded from school; having experienced childhood maltreatment; and having been involved with offending.

29. Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. Young people can be the victim of abuse and may see, hear or experience the effects of domestic abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have a detrimental impact on their health, well-being, development and ability to learn.

30. All staff should be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. IAF works with external statutory mental health agencies, only staff that are appropriately trained should make a diagnosis of mental health issues but all staff are well placed to observe students day to day and identify those whose behaviour may suggest that they are experiencing a mental health difficulty. Safeguarding concerns regarding a student's mental health should be escalated as a safeguarding concern utilising IAF's procedures.

31. IAF works in partnership with a number of agencies and bodies to further extend our understanding of child and adolescent mental health and in particular the impact of trauma on mental health and on the behaviour of our students. All staff should seek to understand the root cause of behavioural issues. IAF promotes personal resilience as part of its mentoring and Prince's Trust programmes, whereby young people are encouraged and supported to positively manage their own mental health and triggers.

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32. All staff should recognise that children are capable of abusing other children (child on child abuse) and that abuse can happen inside and outside of IAF. IAF will take all reasonable steps to ensure that:

- IAF minimises the risk of child on child abuse through the creation of an inclusive and welcoming environment and culture and where instances are challenged and acted upon quickly;
- Allegations of child on child abuse will be investigated by IAF through either safeguarding or disciplinary procedures and will be dealt with in accordance with the IAF's published code of conduct;
- Victims, alleged perpetrators/perpetrators and anyone else affected by child on child abuse will be supported by IAF's central student support team and where necessary will be provided with early help and/or external counselling support.

33. All staff should understand that even if there are no reports in IAF of child on child abuse it does not mean that it is not happening. If staff have **any** concerns regarding child on child abuse that they are reported to the safeguarding team in line with these procedures.

34. All staff should challenge inappropriate behaviours between students as and when they observe them.

35. IAF has a zero tolerance for all forms of harassment and abuse and recognises that abuse is abuse and will never be tolerated or passed off as 'banter', 'having a laugh' or 'just part of growing up'. IAF recognises the gendered nature of child on child abuse but will take all forms of child on child abuse seriously.

36. Child on child abuse can take different forms and is most likely to include but is not limited to:

- Bullying including cyber-bullying, prejudice based bullying and discriminatory bullying;
- Abuse in intimate personal relationships;
- Sexual violence and sexual harassment;
- Upskirting – which typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm, this is now a criminal offence;
- Physical abuse such as hitting, shaking, kicking, biting, hair pulling or otherwise causing physical harm. This may include an online element which facilitates, threatens and encourages physical abuse;
- Consensual or non-consensual sharing of nudes or semi-nudes (also known as sexting); and
- Initiating hazing/ type violent rituals.

37. IAF will take account of Government advice when considering how to respond to allegations of child on child sexual violence and sexual harassment. Reports of sexual violence or sexual harassment are likely to be complex and will require difficult professional decisions to be made. It is important to assure all victims that their concerns are being taken seriously and that they will be supported and kept safe. The safeguarding team will make an immediate risk assessment and will take into account both the victim and the alleged perpetrator. IAF will also consider:

- The wishes of the victim.

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- The nature of the alleged incident and whether any crime has potentially been committed.
- The ages of the people involved.
- Any power imbalance between victim and perpetrator.
- Risk factors and vulnerabilities of both victim and perpetrator.
- If the alleged incident is a one off or a substantiated pattern.
- Any ongoing risks to the victim, other students or college staff.
- Other related issues and the wider context.

38. For more detailed guidance on definitions of sexual harassment, sexual violence and harmful sexual behaviour see appendix 1 (dealing with allegations of peer on peer sexual violence and harassment).

39. All staff should be able to reassure victims that they are being taken seriously and that their concerns will be reported and they will be kept safe. A victim should never be given the impression that they are creating a problem by reporting abuse, sexual harassment or sexual violence. Victims should never be made to feel ashamed for making a report.

40. An essential part of IAF's safeguarding culture is safeguarding students from harmful and inappropriate online material. The safeguarding team take the overarching responsibility for following up on these concerns. In addition IAF embeds an understanding of online safety and the maintenance of a professional online presence as part of its programmes. IAF's approach to online safety is one that takes account of the '4Cs':

- Content – being exposed to illegal, inappropriate or harmful content for example pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism;
- Contact – being subjected to harmful online contact and interaction with other users, for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom and exploit them for sexual, criminal, financial and other purposes.
- Conduct – online behaviour that increases the likelihood of harm for example, making and sharing of nudes/semi-nudes, pornography, sharing explicit images and online bullying; and
- Commerce – educating students to the range of online risks including gambling, inappropriate advertising, phishing and scams.

41. IAF has implemented comprehensive layers of filtering and security which meet the requirements listed in the government advice [Meeting digital and technology standards in schools and colleges - Filtering and monitoring standards for schools and colleges - Guidance - GOV.UK (www.gov.uk)](). Senior DSL and Chair of Board takes responsibility for filtering and monitoring infrastructure on IAF devices.

42. IAF's online safety policy sets out its expectations in terms of behaviour online. IAF does not restrict or prohibit the use of students' own devices, however, any incident of bullying and/or harassment using personal devices will be dealt in line with IAF's code of conduct, this includes incidents that may occur outside of IAF time.

43. IAF will inform parents of IAF's online safety policies and procedures which are attached at appendix 3 to this procedure.

How to report a concern – our safeguarding processes

44. All staff **must** make themselves aware of how to report a concern. Staff **must** respond quickly to concerns being raised. Our procedure is based on the Recognise, Report, Respond, Record principles:

Recognise

A change in behaviour, attendance, punctuality, appearance? Told something or hear something? Does your professional judgement tell you something may be not quite right? **Exercise professional curiosity**

Respond

Respond positively, listen but do not judge, prompt or question what you are being told.

Report

Use IAF's SG1 reporting system to record a concern with the safeguarding team. Do this within 2 hours. If your concern is about a staff member make contact with Jaye Crew Senior DSL

Record

Your concern is followed up by trained staff within the safeguarding team and where necessary reported to external agencies. They will record actions, progress and outcomes on an SG2 form.

45. **All** safeguarding or prevent-related concerns/disclosures **must** be reported following the safeguarding procedure**. Concerns must be reported to the team within 2 hours of the concern or disclosure.**

46. If a student is making a disclosure, you need to ask questions but keep them to a minimum and do not ask leading questions. The use of leading questions can cause problems for the subsequent investigation and any court proceedings. **Listen without judgement**.

47. Reassure the student that they have done the right thing in reporting the incident to you. Inform them that you will need to pass the information on to the team. **Do not** promise confidentiality as the team may need to share the information with external agencies, and for students aged 16-18, parents.

48. Comprehensive and factual notes of the incident must be made within **2 hours**, including:

    • clear and comprehensive summary of the concern
    • your name and the names of others present
    • the name of the student at risk and any other linked student(s).

49. *A disclosure is:* When a person tells you that something has happened. Disclosures should be reported to the safeguarding team using our procedure (see paragraphs 43-47), do not promise confidentiality.

50. *A concern is:* when you feel that something may not be right with a student and have not been told anything. You may choose to report your concern immediately to the safeguarding team using the process in paragraphs 43-47 without speaking to the student or you may raise your concerns with the student prior to reporting or seek advice and support from the safeguarding team prior to formally raising a new incident.

51. Please note that the safeguarding team work normal college hours (8.30am – 5pm) and have a rota of staff available outside of term time, as such concerns that are raised through our safeguarding reporting systems after 5pm may not be looked at until the next day. During afterhours work such as residential QTLP & Teaching Delivery Manager on standby for urgent safeguarding concerns.

52. If you are unable to reach any out of hours contacts and there is a pressing and urgent risk of harm staff must make a referral to the multi-agency safeguarding hub (MASH) team themselves at the following web link https://www.nottinghamshire.gov.uk/care/safeguarding/childrens-mash, for students residing in Derbyshire referrals should be to the Starting Point service https://www.derbyshire.gov.uk/social-health/children-and-families/support-for-families/starting-point-referral-form/starting-point-contact-and-referral-service.aspx . Other concerns may be more appropriately dealt with by emergency services such as the police or ambulance service and these should be reported by dialling 999. Staff should let the safeguarding team know that a referral has been made.

53. Examples that constitute an urgent concern and appropriate action include but are not limited to:

- A student disclosing that they have taken an overdose. If DSL not available call for an ambulance to the home address. You would not need consent from the individual if you felt that the person was at risk of serious injury/death.
- A student telling you that they are going to kill themselves and have a plan to do so. If DSL not available, try to call parents/carers (if under 18) to check in, if they are not available either call the police for a safe and well check or the ambulance. Again you would not need consent if the individual was at serious risk of harm
- A student under 18 telling you that they fear for their safety because of abuse in the home. If DSL not available call this in to the out of hours team at either MASH (Notts) or Starting Point (Derbyshire). If the student is over 18 advise them to phone this into the police themselves or if they are unable to do so call the police with their consent.
- A student under the age of 18 telling you that they have been kicked out of home and have nowhere to go. If DSL not available call into the out of hours duty team at MASH or Starting Point.

54.   **Do not** investigate any allegation that has been disclosed to you or any concerns that you might have. This is undertaken by external agencies if appropriate. See FGM Mandatory reporting requirements contained at the end of this procedure.

Responding to a concern – the role of the safeguarding team

55.   Incidents reported through SG1 will initially be assessed on a triage basis, with the most urgent concerns being dealt with first. The designated person will meet with the student (if appropriate) and will note how the concern has been followed up and resolved and note any action and decisions reached. Feedback will be provided to staff members who raised the concern and any other staff who need to be made aware of the concern and the outcome.

56.   Serious and/or complex cases will be discussed with the Senior DSL. The Senior DSL will approve the closure of incidents through the SG1/SG2 system and will be expected to confirm no further action is necessary.

57.   Information sharing is vital in identifying and tackling all forms of abuse and neglect and in promoting students' welfare including educational outcomes. IAF has clear powers to share, hold and use information for these purposes for children under the age of 18.

58.   For young people under the age of 18, concerns would usually be shared with parents in line with guidance in keeping children safe in education. Parents would not be informed where it may well cause greater risk of harm to the young person. Reasons for not informing parents will be logged and, should a referral to social care be needed, flagged with the DSL.

59.   For students over the age of 18, IAF would usually need to seek consent to share information with other professionals, agencies and next of kin. However, where the team assess significant and imminent risk, for example, risk of suicide, the Senior DSL may authorise sharing information without consent. The lack of consent will be made explicit when sharing information.

60. All staff need to understand relevant data protection principles and how they relate to safeguarding matters. GDPR allows the processing and storage of sensitive and personal information in relation to safeguarding, this should be treated as 'special category data'. Safeguarding of children and individuals at risk is a processing condition that allows practitioners to share special category data. This includes allowing practitioners to share information without consent where there is good reason to do so. Fears about sharing information must not be allowed to stand in the way of the need to safeguard, promote the welfare and protect the safety of children. The safeguarding team will be the ones to share data and information and if in doubt about sharing information with other professionals please seek their advice in advance.

Storage and transfer of files

61. All copies of records, either electronic or paper based, **MUST** be kept in a secure place; e.g. paper based records in a safe and electronic records should be in a secure and restricted folder.

62. IAF will, wherever practical, store and keep up to date two emergency contact details for all students and particularly those under the age of 18 or who is deemed a vulnerable adult.

63. Where students leave IAF for another provider, IAF will take all reasonable steps to ensure the transfer of safeguarding files to the new provider as soon as possible. IAF will work with local schools and the local authority to ensure that files are transferred to IAF in a timely fashion after a student enrols with us, IAF will have an information sharing protocol in place to enable this to happen securely.

Raising concerns about members of staff

64. Any suspicion, allegation or actual abuse of a student by a member of staff, including supply staff, volunteers and contractors, must be reported to the Senior DSL, Jaye Crew immediately.

65. In the event of a concern about the Senior DSL IAF Director should be informed.

66. In the event of a complaint against a senior post holder, the Chair of Board should be informed. Senior post holder at IAF is the Director.

67. All staff should be aware of their professional boundaries and **must** not cross them, they also need to be aware that their relationships and associations (including online) may have a safeguarding implication.

68. Any allegations will be managed in line with Keeping Children Safe in Education statutory guidance. All such allegations against a member of staff which meet the harm threshold will be reported to the Local Authority designated officer in the first instance. Staff should be aware that such an allegation could result in a referral to the Disclosure and Barring Service (DBS) and the National Council for Teaching and Leadership. The Senior DSL will use NPCC guidance, *"When to Call the Police"* to determine whether the police need to be involved.

However, not all concerns will meet the harm threshold. IAF encourages and promotes a culture whereby staff feel enabled to report concerns about a colleague's conduct and have confidence that those concerns will be taken seriously. **All** concerns whether or not they meet the harm threshold will therefore be recorded to enable IAF to build a picture of suitability over time.

69. Low level concerns are those that do not meet the harm threshold. It does not mean that these concerns are not significant, a low level concern is **any** concern, no matter how small, and even if no more than a 'nagging doubt', that an adult working on behalf of IAF may have acted in a way that is inconsistent with the staff code of conduct, examples can include but are not limited to:

    - Being over friendly with young people;
    - Having favourites;
    - Taking photographs of young people on their personal mobile phones;
    - Engaging with a young person on a 1:1 basis, behind closed doors or in a secluded area; and/or
    - Using inappropriate, intimidating, offensive or overly sexualised language.

70. Such behaviour exists on a spectrum from inadvertent/thoughtless or behaviour that may look to be inappropriate but may not be in the specific circumstances through to what is ultimately intended to enable abuse. It is important therefore that concerns are shared with the Senior DSL (Jaye Crew) who will make a judgement about seriousness and where necessary seek advice from the LADO. Concerns raised about contractors and supply staff will be shared with the individual's employer and may be escalated to the LADO.

71. IAF has a duty to ensure that all staff and volunteers who work with children under the age of 18 are suitable to work with children. Staff may behave in a way that may call into question their suitability to work with children and these allegations or actions may take place outside of the IAF environment and may not directly involve children, for example a member of staff may be accused of a domestic violence incident where no children were involved. IAF will consider what triggered such action and the potential for such triggers to be present within IAF. This will be managed by the senior management team through a process of risk assessment. IAF reserves the right to attend any court proceedings related to incidents with staff members where there is some question, as a result of the incident, that the individual may no longer be suitable to work with children and young people. Staff should report where they may be involved with social care for their own children as this may need to be referred to the LADO for further investigation.

Raising concerns about safeguarding practice.

72. All staff have the right to raise concerns about IAF's safeguarding practices. Whilst any member of staff can raise concerns with any of the senior management team, it can also be done using IAF's whistleblowing procedure.

73. Where a staff member feels unable to raise an issue with IAF through these procedures or feels that their genuine concerns are not being addressed, other channels may be available to them including via local safeguarding partners and/or through Ofsted processes. The NSPCC

whistleblowing helpline is an alternative route for staff who do not feel able to raise concerns internally. They can be contacted on 0800 028 0285 or email help@nspcc.org.uk.

Staff Training

74.   All staff and volunteers are required to undertake their mandatory training when they commence employment with IAF. Prior to employment commencing all staff are required to watch a short video explaining IAF's safeguarding processes and procedures. Part one of KCSIE along with IAF's safeguarding procedure is provided to all new staff as part of their new starter pack and staff are expected to read and understand them. In addition all staff are required to attend an annual mandatory update on Safeguarding and Prevent and read and understand Keeping Children Safe in Education part 1 and revised safeguarding procedures on an annual basis. Training will include online safety training for staff.

75.   All members of staff with formalised responsibilities for safeguarding (DSL and deputies) will undertake formalised training through the local authority every two years.

76.   The Board will be provided with a safeguarding overview as part of their induction and are expected to attend the annual mandatory safeguarding updates.

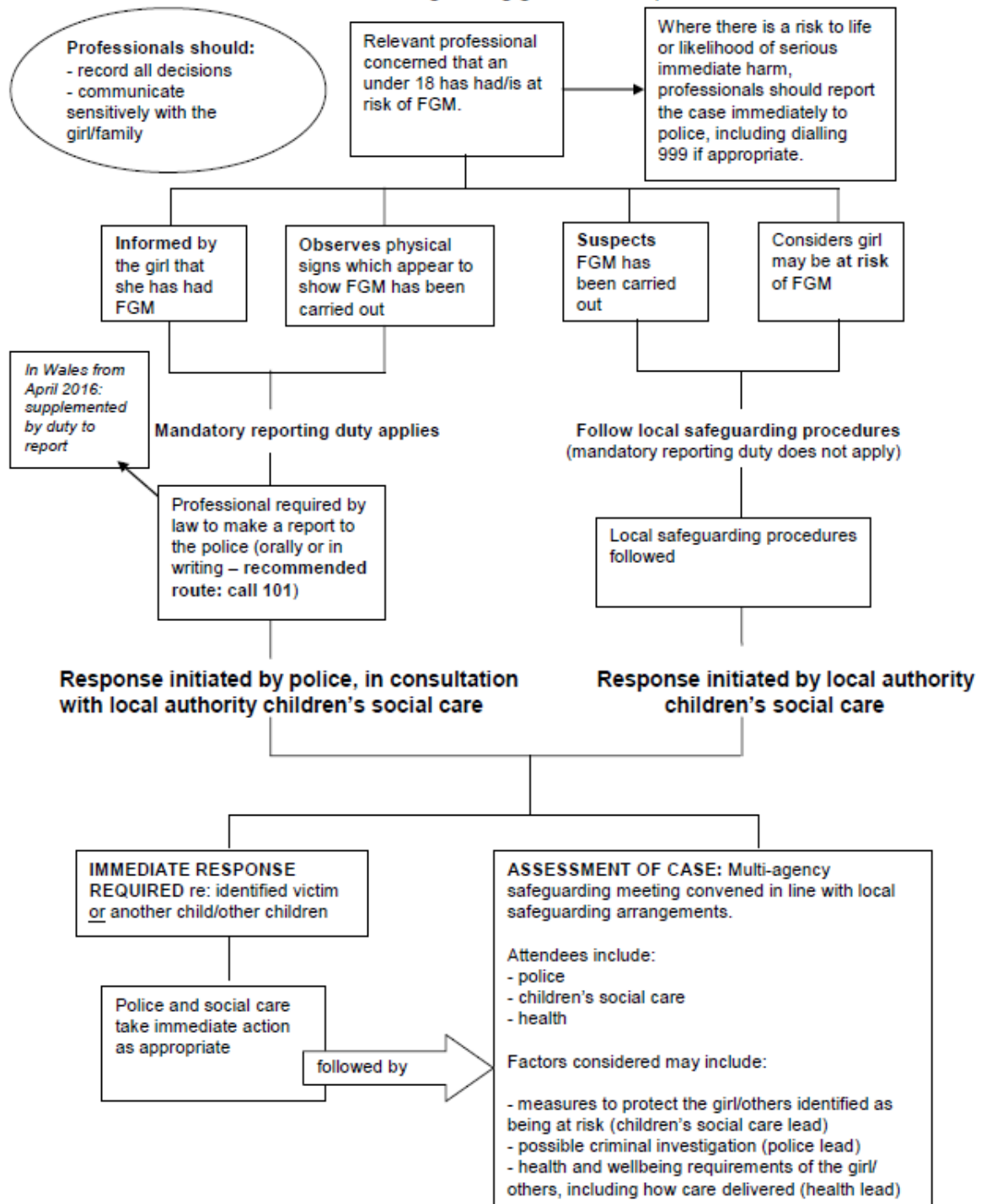# Female genital mutilation – mandatory reporting procedure

In accordance with the latest legislation and guidance issued by the government a **teacher** that in the course of their work discovers that an act of Female Genital Mutilation appears to have been carried out on a girl under the age of 18 must make a report to the police. The duty applies to cases directly disclosed by the victim and does not include cases reported by a parent, guardian, sibling or friend. Please refer to the mandatory reporting process map on the next page.

 The duty is a personal duty which requires the individual professional who becomes aware of the case to make the report; the responsibility cannot be transferred.

All members of staff must contact the Safeguarding team within 2 hours of a disclosure following the college's Safeguarding procedure. The team will then support any staff member that needs to report an informed case of Female Genital Mutilation to the police. The legislation does not prevent you from sharing information with the DSL and seeking further advice.

The FGM process map is included overleaf:

This process map is intended to demonstrate where the FGM mandatory reporting duty fits within existing processes. It is not intended to be an exhaustive guide, and should be considered in the context of wider safeguarding guidance and processes.

Professionals should:
- record all decisions
- communicate sensitively with the girl/family

Relevant professional concerned that an under 18 has had/is at risk of FGM.

Where there is a risk to life or likelihood of serious immediate harm, professionals should report the case immediately to police, including dialling 999 if appropriate.

Informed by the girl that she has had FGM

Observes physical signs which appear to show FGM has been carried out

Suspects FGM has been carried out

Considers girl may be at risk of FGM

In Wales from April 2016: supplemented by duty to report

Mandatory reporting duty applies

Professional required by law to make a report to the police (orally or in writing – recommended route: call 101)

Follow local safeguarding procedures (mandatory reporting duty does not apply)

Local safeguarding procedures followed

Response initiated by police, in consultation with local authority children's social care

Response initiated by local authority children's social care

IMMEDIATE RESPONSE REQUIRED re: identified victim or another child/other children

Police and social care take immediate action as appropriate

followed by

ASSESSMENT OF CASE: Multi-agency safeguarding meeting convened in line with local safeguarding arrangements.

Attendees include:
- police
- children's social care
- health

Factors considered may include:

- measures to protect the girl/others identified as being at risk (children's social care lead)
- possible criminal investigation (police lead)
- health and wellbeing requirements of the girl/others, including how care delivered (health lead)

18

Procedure for dealing with allegations of child on child sexual violence and sexual harassment (including online)

Introduction

1. Sexual violence and sexual harassment can occur between two students of any age and sex. It can occur through a group of children sexually assaulting or harassing a single young person or a group of young people. Issues exist on a continuum and can occur face to face and online. IAF maintains an attitude of **it can happen here**.

2. Addressing inappropriate behaviour (even if it appears relatively low level) is important in developing a culture where harassment of any kind is not tolerated, where concerns are taken seriously and appropriate action taken to keep young people safe.

3. Students who are victims of sexual violence and sexual harassment are likely to find the experience stressful and distressing. This may adversely affect their educational attainment and these factors are likely to be exacerbated if the alleged perpetrator also attends IAF.

4. Along with providing support to victims, IAF will weigh the need to provide the alleged perpetrator with an education, with welfare support and the need to implement any disciplinary sanctions.

5. IAF has a zero tolerance to any form of abuse or harassment and this extends to sexual violence and sexual harassment. IAF recognises that abuse is abuse and will never be tolerated or passed off as 'banter', 'having a laugh' or 'just part of growing up'. IAF recognises the gendered nature of child on child abuse but will take all forms of peer on peer abuse seriously.

6. Children with special educational needs and disabilities (SEND) are three times more likely to be abused by their peers. Additional barriers can exist to identifying abuse and this may include dismissing indicators of abuse as part of an individual's identified need. It is therefore essential that we never dismiss concerns raised by young people with SEND.

Definitions

7. **Sexual violence**, these are largely offences under the Sexual Offences Act 2003 and include:

   - Rape – intentional sexual penetration of the vagina, anus or mouth of the victim with the perpetrator's penis without consent.
   - Assault by penetration – intentional sexual penetration of the vagina or anus with a part of his/her body or other object without consent.
   - Sexual assault - intentionally touching another person in a sexual way without consent, this covers a wide range of behaviour in that a single act of kissing or touching of the bottom or breast without consent can still be considered sexual assault.

- Causing someone to engage in sexual activity without consent – this can include forcing someone to strip, to touch themselves sexually, or to engage in sexual activity with a third party.

8. **Sexual Harassment** – this relates to unwanted conduct of a sexual nature that can occur online and both inside and outside of IAF. Sexual harassment is likely to violate a student's dignity and/or make them feel intimidated, degraded and/or humiliated. Sexual harassment can include but is not limited to:

   - Sexual comments – telling stories, making lewd comments, making sexual remarks about clothes or appearance and calling someone sexualised names;
   - Sexual jokes or taunting;
   - Physical behaviour such as deliberately brushing against someone, interfering with someone's clothes, displaying pictures, photos, or drawings of a sexual nature; and/or
   - Online sexual harassment, this may be standalone or part of a wider pattern and may include consensual or non-consensual sharing of nudes or semi-nudes, sharing explicit and unwanted content, upskirting, sexualised online bullying, unwanted sexual comments and messages and sexual coercion or threats.

9. **Harmful sexual behaviour** – sexual behaviour exists on a wide continuum from normal and developmentally appropriate to problematic abusive or violent. Figure 1 below provides more detail. Harmful sexual behaviour is an umbrella term widely used in child protection that deals with behaviour that is developmentally inappropriate and may cause developmental damage.

Figure 1

Normal	Inappropriate	Problematic	Abusive	Violent
- Developmentally expected - Socially acceptable - Consensual, mutual, reciprocal - Shared decision-making	- Single instances of inappropriate sexual behaviour - Socially acceptable behaviour within peer group - Context for behaviour may be inappropriate - Generally consensual and reciprocal	- Problematic and concerning behaviour - Developmentally unusual and socially unexpected - No overt elements of victimisation - Consent issues may be unclear - May lack reciprocity or equal power - May include levels of compulsivity	- Victimising intent or outcome - Includes misuse of power - Coercion and force to ensure victim compliance - Intrusive - Informed consent lacking or not able to be freely given by victim - May include elements of expressive violence	- Physically violent sexual abuse - Highly intrusive - Instrumental violence that is psychologically and/or sexually arousing to the perpetrator - Sadism

Source: Hackett, S, 'Children, young people and sexual violence' in 'Children behaving badly? Exploring peer violence between children and young people', 2010.

10. **Consent -** Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another, e.g.to vaginal but not anal sex or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity and each time activity occurs. Someone consents to vaginal, anal or oral penetration only if s/he agrees by choice to that penetration and has the freedom and capacity to make that choice.
     - A child under the age of 13 can never consent to any sexual activity
     - The age of consent is 16
     - Sexual intercourse without consent is rape.

Creating a culture of zero tolerance

11. **All** staff have a responsibility to challenge inappropriate sexual comments and actions whenever they observe them. This enables IAF to foster a culture where students feel confident that whilst this behaviour may happen, swift action is taken to address it.

12. At induction all students will be made aware of our expectations, where firm ground rules are set and students understand what constitutes abuse and harassment and the actions that will be taken to address issues.

13. A student is likely to disclose abuse to an adult that they trust and it is therefore important that all staff are aware that they may receive a disclosure from a student. **All** staff have a responsibility to report concerns to the safeguarding team, using our safeguarding procedures where they feel those concerns or issues are putting a young person at risk of harm, if in doubt staff should seek advice from the safeguarding team. It is important that the staff member receiving the initial disclosure reassures the student they have done the right thing in coming forward but should never promise confidentiality as it may well be in the best interests of the victim to share information with parents and report concerns to external agencies.

Responding to an allegation of sexual violence or harassment

14. The Senior DSL will take the lead in response to allegations of sexual violence or harassment.

15. It is important that victims are assured that they are being taken seriously and they will be supported and kept safe. Abuse that occurs outside of IAF should not be downplayed and be treated equally as seriously.

16. The safeguarding team will consider the wishes of the victim in terms of how they want to proceed. Victims will be given as much control as reasonably possible but this will be balanced against IAF's legal duty to act to protect children and vulnerable adults.

17. The safeguarding team will be responsible for putting in place a risk assessment that considers the proximity of victim and alleged perpetrator and steps and safeguards that need to be taken to keep both parties separate from each other. Where there is an allegation of sexual violence (especially rape or assault by penetration) and both students share the same classes,

immediate steps will be taken to remove the alleged perpetrator from the class and alternative arrangements made for them to continue with their studies. Risk assessments will be done using the template attached to this procedure and will be shared with the Senior DSL.

18. The Senior DSL, will make an assessment, in consultation with the victim, about whether a crime has been committed and therefore the allegation needs reporting to the police. If this is the case the victim will be supported to do so. If it is not clear whether a crime has been committed but allegations meet thresholds for social care intervention then a referral will be made to the relevant social care team for the student.

19. Consent would be sought prior to making the referral, however, for young people aged between 16-18 referrals can be made without consent, parents would usually be informed of allegations for young people aged 16-18. For allegations made for students over the age of 18 IAF **would not** make referral or reports to external agencies without the consent of the individual.

20. The safeguarding team will make an assessment of when to inform the alleged perpetrator of the allegations. Where a report is going to be made to either the police or social care advice would be sought from the relevant agency and next steps considered and led by that agency. This does not stop IAF taking steps to safeguard students (e.g. separating the victim from alleged perpetrator).

21. There are largely four routes through which IAF may choose to manage allegations:

    - Internal investigation – where incidents are one-off, are relatively low-level and where no crime has been committed. Students are not in need of early help and no referral is necessary to external agencies. Outcomes of the investigation will be recorded and investigations conducted in line with a zero tolerance approach. Disciplinary sanction where necessary will be used.
    - Early help – this can link to the internal investigation and may include early help from within IAF or more formally through an early help referral to social care. Decisions, discussions and reasons for decisions should be recorded.
    - Referral to children's social care – where a child has been harmed, is at risk of harm or is in immediate danger a referral should be made to children's social care. At the point of referral IAF will work alongside the statutory agencies. Steps to minimise risk to student in IAF will still be taken by IAF in liaison with social care with care taken that any measures put in place by IAF do not jeopardise the investigation. The investigation will be led by social care with the support of IAF. Details of reports, concerns will be logged by the Senior DSL.
    - Reporting to the police – Any report to the police is likely to be in parallel to a report to social care and will be made when a crime has been committed. The team will consult with police and what information can be shared with staff and others. They will also discuss the best ways to protect the victim and their anonymity. The police will consider what action to take and this may be the imposition of bail conditions that limits the alleged perpetrator's access to IAF. Consideration will need to be given as to how to enable the alleged perpetrator to continue with their studies.

22. When concerns are referred to external agencies IAF will be led by them in terms of the information the alleged perpetrator is given of concerns raised. It is often the case that the police or social care want to take the lead in communicating with the perpetrator. In this case agencies will keep IAF informed and advise on any additional measures that need to be put in place to protect the victim.

22

23. On conclusion of the investigation, even where statutory agencies report no further action, IAF will consider what steps it needs to take to continue to support and protect the victim. Considerations will include what ongoing support they need to come to terms with what is likely to be a traumatic incident. Consideration should be given to the victim's wishes and a desire wherever possible to keep them in IAF and learning.

24. IAF will also consider what action needs to be taken to support the alleged perpetrator. Consideration should be given as to whether the perpetrator themselves could be a victim of abuse and what can and should be done to stop reoffending behaviour. It is likely that a risk assessment will remain in place, the safeguarding team will meet with the parents of the alleged perpetrator (for students under the age of 18) to explain the risk assessment and any measures that have been put in place.

25. If allegations are found to be malicious, unfounded or false the safeguarding team will consider whether the victim may need support, whether the allegation was a cry for help or where clear evidence exits that allegations were deliberately invented or malicious whether any disciplinary action needs to be taken.

26. Finally, IAF will consider what support and action needs to be taken to protect and safeguard other students who may have witnessed incidents or may have been supporting either the victim or alleged perpetrator.

Serious Sexual Violence and Sexual Harassment – Assessment of risk

Date risk assessment completed:	
Name of student (victim):	
Age:	
Other student involved:	
Age:	

Considerations	Summary of considerations, risks and mitigations.
The wishes of the victim. How do they want to proceed?	
What is the nature of the alleged incident – has a crime been committed and does it involve HSB?	
Developmental stages of the young people involved – are there any signs of developmental delay?	
Any power imbalances?	
Does either student have a disability or learning difficulty?	
Are victim or alleged perpetrator known to social care or have any other vulnerabilities?	
Is the incident one off or sustained abuse?	
Are the students in a relationship?	
Do the students study within the same area or classroom – how easy is it to keep students separate?	
Are external agencies or the police involved?	
Are there any bail conditions that impact on the college's decision making?	

Are there ongoing risks to the victim and potentially other college students?	
Links to CCE or CSE?	
Links to intra-familial harm – any support needed for siblings at the college as a result of the incident?	
Other considerations	

Summary of key risks and any mitigating factors:

IAF actions – to be reviewed on:

Appendix 2

STUDENT BULLYING AND HARASSMENT STATEMENT OF INTENT

INTRODUCTION

1.   IAF does not accept any form of bullying or harassment. Students, staff members and visitors have a right to be treated with dignity and respect.

2.   Bullying and harassment includes but is not limited to: the use of abusive or derogatory language, physical violence, verbal threats; and taking and circulating unwanted images or videos.

3.   Bullying and harassment can be child on child, staff on students or student on staff members. All incidences will be taken seriously.

4.   Bullying and harassment, especially if left unaddressed, can have a devastating effect on individuals. It can be a barrier to their learning and have serious consequences for their mental health. Bullying and harassment does not only affect an individual during adolescence but can have a lasting effect on their lives well into adulthood.

5.   By effectively preventing and tackling bullying and harassment, IAF can help to create a safe, disciplined and inclusive culture where students develop the skills and knowledge to prepare well for life in modern Britain.

6.   In all cases the principles of 'natural justice' are applied when a complaint is investigated, namely:
    - the complaint shall be dealt with in good faith, and in an impartial and fair manner
    - that all concerned - complainant and the person or persons to whom the claim is addressed - shall have the right to a fair hearing, and to know the reasons for any decision made.
    - that the complainant and the person or persons to whom the complaint is addressed shall be aware of statements and arguments brought by the other in relation to the complaint.

PURPOSE

7.   IAF aims to ensure that we operate in an inclusive environment where effective learning can take place. This statement of intent promotes and encourages all students to achieve and maintain acceptable standards of conduct for academic performance; it will also strengthen the message that there are clear consequences for inappropriate behaviour conducted for any young person using IAF services.

8.   IAF is committed to ensuring that all students who may be subject to disciplinary processes are dealt with in a fair and equitable manner, whilst taking into account the individual circumstances of each student involved.

9.   The Student Code of Conduct will be used to support the Bullying and Harassment Statement of Intent where needed.

SCOPE OF STATEMENT OF INTENT

10.   Applies to all staff who have an active role to play to promote an inclusive culture, can identify the signs of bullying and harassment and follow the actions that need to be undertaken if bullying and harassment is suspected.

DEFINITIONS

11.   The below are the definitions of bullying and harassment.

BULLYING

Bullying is behaviour by an individual or group, repeated over time, that intentionally hurts another individual or group either physically or emotionally. Bullying can take many forms (for instance, cyber-bullying via text messages, social media or gaming, which can include the use of images and video) and is often motivated by prejudice against particular groups, for example on grounds of race, religion, gender, sexual orientation, special educational needs or disabilities, or because a child is adopted, in care or has caring responsibilities. It might be motivated by actual differences between people, or perceived differences.

CYBERBULLING

Cyberbullying is bullying that takes place over digital devices or platforms. With the rapid development and widespread access to technology, technology has provided a new medium for 'virtual' bullying. Cyber-bullying is a different form of bullying and can happen at any time of the day and can be potentially shared with a bigger audience.

HARASSMENT

Harassment may be directed at an individual or a group. Under The Equality Act 2010, harassment is defined as "Unwanted conduct related to a relevant protected characteristic, which has the purpose or effect of violating an individual's dignity, or creating an intimidating, hostile, degrading, humiliating or offensive environment for that individual."

SEXUAL HARASSMENT

Sexual harassment is unwelcome conduct of a sexual nature towards another person which could reasonably be expected to make that other person feel offended, humiliated or intimidated. A single incident is enough to be considered sexual harassment - it does not have to be repeated behaviour.

The person engaging in unwelcome behaviour does not have to intend to be sexually harassing the other person for the behaviour to be considered sexual harassment. Regardless of what was intended, sexual harassment is defined by the nature and the impact of the behaviour, not the intention behind it.

PROCEUDRES FOR DEALING WITH ALLEGATIONS

- Reassure the student that they have done the right thing in reporting the incident of bullying or harassment and it is important to portray a calm, non-judgmental and positive response to the student.
- If you feel you are the victim of bullying or harassment - act promptly and tell any member of IAF staff.
- All disclosures about bullying and harassment will be taken seriously and treated sensitively. It is important to discuss all possible and desirable strategies with the victim in the first instance and proceed as appropriate.
- Restorative questions will be used by staff when speaking to alleged victims to ensure a fair process and that individuals have had the opportunity to have their say.
- Notes will be taken regarding the discussion and the staff member will ask the student to complete a statement, which must be signed to declare a true reflection of events. It should be made clear that statement may be shared with the person who the complaint is about.
- An investigation will be undertaken and the Student or Staff Disciplinary Procedure may be followed against the alleged bully.
- Bullying and harassment that takes place outside IAF, but involves an IAF student or staff member will be investigated and acted upon by IAF staff.
- If the bullying and harassment could be deemed as criminal or poses a serious threat to the lives of students or the public, the Police will be informed immediately.
- Confidentiality will be maintained, but it cannot be guaranteed. If a student decides not to take any further action after reporting the incident, IAF reserves the right to investigate the incident and apply disciplinary sanctions where appropriate. IAF will not investigate anonymous complaints.
- In some circumstances, if the student is under the age of 18, IAF may make an informed decision whether to involve the students' parents or guardian.
- Restorative meetings will be held on some occurrences to explore a resolution where appropriate; on other occasions, a Behaviour Contract may be introduced as the best course of action.
- If the student or staff member decides the matter is best resolved informally, an accurate record should be kept. In some cases, speaking directly with the person concerned can be enough to end the situation. For example, sometimes students do not realise that their conduct is causing offence and explaining this to them is enough to make them rethink their behaviour.
- If the matter needs to be addressed through a more formal process or there is a serious safeguarding concern this needs to be reported to IAF's Safeguarding Team.
- If there are allegations of staff bullying or harassment this needs to be forwarded to the Senior DSL for appropriate action in line with IAF's safeguarding procedures.

Introduction

1. IAF recognises the opportunities that technology offers to teaching, learning, engagement and communication.

2. However, the accessible and global nature of the internet and the variety of technologies available mean that we are also aware of potential risks and challenges associated with such use. Our approach is to implement safeguards within IAF and to support staff and learners to identify and manage risks independently. We believe this can be achieved through a combination of security measures, training and guidance and the implementation of our associated policies.

3. Our duties enshrined within keeping children safe in education require us to do all we can to ensure that our students stay safe online and further, ensure they are equipped with an understanding of risk, resilience and personal strategies to keep themselves safe online.

4. Our online safety policy should be read in conjunction with the following policies, procedures and guidance notes: safeguarding policy and procedure; bullying and harassment policy (students); IT acceptable use policy; behaviour management and student code of conduct ;); staff code of conduct; and staff social media policy.

Scope

5. This policy covers:

   - Anyone logging into any network, service, website or portal associated with The Inspire and Achieve Foundation.
   - Connecting a device via The Inspire and Achieve network.
   - Any electronic communication with an IAF student, member of Staff or contractor.

Definitions

6. In setting out the definitions related to online safety the college uses the 4 Cs outlines within keeping children safe in education which have been incorporated into IAF's safeguarding processes and procedures:

   - Content – being exposed to illegal, inappropriate or harmful content for example pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism;
   - Contact – being subjected to harmful online contact and interaction with other users, for example: peer to peer pressure, commercial advertising and adults posing as

children or young adults with the intention to groom and exploit them for sexual, criminal, financial and other purposes;

- Conduct – online behaviour that increases the likelihood of harm for example, making and sharing of nudes/semi-nudes, pornography, sharing explicit images and cyber bullying; and
- Commerce – educating students to the range of online risks including gambling, inappropriate advertising, phishing and scams.

Responsibilities

7. **All staff** are responsible for ensuring the safety of students online and for ensuring their own conduct is appropriate and does not put students at risk of harm.

8. **All staff** are responsible for reporting any concerns about students to the safeguarding team in line with the college's procedures;

9. **The designated safeguarding lead** is responsible for ensuring that appropriate training is provided to all staff in relation to online safety and that appropriate action is taken to safeguard students when concerns arise;

10. **The QTLP and Teaching Delivery Manager** is responsible for ensuring students have appropriate and meaningful training/information around online safety;

11. **The DSL & Chair of Board** are responsible for ensuring appropriate and effective filtering and monitoring systems are in place;

12. **All students** are responsible for ensuring their own conduct does not put others at risk or harm and for reporting any concerns they may have about online safety.

Monitoring

13. IAF actively monitor, log and report on students and staff use of IT systems and IT network usage as part of our safeguarding and prevent duties. This includes the use of filtering systems.

14. An attempt to interfere or avoid the monitoring or logging of any IT systems will be referred to the IAF's disciplinary process. Where requested this information will be securely shared with appropriate local authorities and external support agencies.

Training

15. Students will be provided with online safety guidance at induction, this includes the proper use of IAF systems. Prince's Trust Team planning will include appropriate and relevant online guidance for students. PT will also ensure students consider their digital footprint in both a personal and professional context.

16. Issues associated with online safety apply across IAF and students should receive guidance on what precautions and safeguards are appropriate when making use of the internet and mobile technologies. Students should also know what to do and who to talk to where they have concerns about inappropriate content, either where that material is directed to them, or where

it is discovered as part of a random search. Within classes, students will be encouraged to question the validity and reliability of materials researched, viewed or downloaded. They will also be encouraged to respect the copyright of other parties and to cite references properly.

17. Staff will receive an introductory session for digital learning/working systems and environments within the induction period. This introductory session will signpost appropriate policies and procedures. Any new or temporary users will also be asked to sign IAF's IT acceptable use policy.

Behaviour

18. Communications by staff and learners should be courteous and respectful at all times whether offline or online. Any reported incident of bullying or harassment or other unacceptable conduct will be treated seriously and in line with the Anti-Bullying and Harassment processes (staff and students).

19. Cyber bullying is a form of bullying. As it takes place online, it is not confined to IAF venues or working hours. Cyber bullies can communicate their messages to a wide audience with speed and often remain anonymous or unidentifiable.

20. Cyber bullying includes bullying via:

   - Text message and messaging apps e.g. sending unwelcome texts or messages that are threatening or cause distress.
   - Picture/video-clips e.g. using mobile device cameras to bully someone, with images usually sent to other people, social media sites/apps or websites.
   - Phone call e.g. silent calls or abusive messages. The bully often disguises their number.
   - Email e.g. emailing upsetting messages, often using a different name for anonymity or using someone else's name to deflect the blame on them.
   - Chat room e.g. sending upsetting responses to people when they are in a web-based chat room.
   - Instant Messaging (IM) e.g. sending unpleasant messages in real-time conversations online.
   - Websites e.g. insulting blogs, personal websites, social networking sites and online personal polling sites.

21. Where conduct is found to be unacceptable, IAF will deal with the matter internally and refer to relevant policies such as the staff and student code of conduct and disciplinary procedures. Where conduct is considered illegal, IAF will report the matter to the police.

Online Communication

22. The bullet points below offer some guidance for both students and staff in their online communications:

- Do not create, store, exchange, display, print or circulate any message or media which may cause offense to others.
- Do not post or circulate any message which may be considered harassment
- Do not send messages at random or excessively, also referred to as "spamming", consider carefully the reply all function in email.
- Staff should not use personal social media accounts as a method of communicating with students.
- Staff should not give personal contact details to students.
- Student contact details must never be stored on a staff members' personal device(s), including computers, laptops, mobile phones, tablets, personal cloud or personal storage devices.
- IAF devices may, on occasion, be used to gather either video or photographic evidence in order to support students' course requirements provided that the IAF hold a signed authorisation form for the student in question.
- Do not give out log on details and passwords to anyone, IAF will never ask you to disclose your password.
- Do not open files or emails from people you do not know. They may contain viruses or offensive material.
- If you see something abusive or upsetting online, you report it to a member of staff and/or the safeguarding team.
- Do not save your log-on details on shared computers as some people may use your name to cause harm to others.
- Make sure that your computer is locked when not in use so that others cannot act inappropriately using your profile.
- Do not post any confidential information to any online platform.
- Students should not send friend requests to members of staff, they are unable to accept them. Similarly staff should not seek to add students as friends on their personal social media accounts. Social media presences established in the interests of teaching and learning must be established in line with the IA's social media policy.

Feedback and review

23. Staff and students are actively encouraged to review and feedback on this policy document. This is a working document and as such changes can be made throughout the year, the policy will be next formally reviewed and re-approved in 2024.

Appendix 4:

Helpful information:

Helplines and reporting

- Children can talk to a ChildLine counsellor 24 hours a day about anything that is worrying them by calling 0800 11 11 or in an online chat at http://www.childline.org.uk/Talk/Chat/Pages/OnlineChat.aspx.

- If parents or carers are concerned that their child is being contacted by adults as a result of sharing sexual imagery they should report to NCA-CEOP at www.ceop.police.uk/safety-centre

- ChildLine and the Internet Watch Foundation have partnered to help children get sexual or naked images removed from the internet. Young person can get their photo removed by talking to a ChildLine counsellor. More information is available at http://www.childline.org.uk/explore/onlinesafety/pages/sexting.aspx

- If parents and carers are concerned about their child, they can contact the NSPCC Helpline by ringing 0808 800 5000, by emailing help@nspcc.org.uk, or by texting 88858. They can also ring the Online Safety Helpline by calling 0808 800 5002.

Advice and information for parents

- The NSPCC has information and advice about sexting available on its website: NSPCC Sexting
- The National Crime Agency/CEOP has produced a film resource for parents and carers to help them prevent their children coming to harm through sharing sexual imagery: THINKUKNOW Nude-selfies-a-parents-guide
- Childnet have information and advice about sexting available on its website: http://www.childnet.com/young-people/secondary/hot-topics/sexting

Resources parents could highlight to their children

- ChildLine have created Zip-It, an app that provides witty comebacks in order to help young person say no to requests for naked images   Childline Zipit Ap

- There is information on the ChildLine website for young people about sexting:

    Childline information for young people

- The Safer Internet Centre has produced resources called 'Childnet So you got naked online which help young people to handle incidents of sexting

The NSPCC adults helpline: 0800 028 0285 The NSPCC has partnered with O2 to offer direct support to parents and other adults on issues relating to online safety.

ChildLine: www.childline.org.uk   ChildLine offers direct support to children and young people including issues relating to the sharing of sexual imagery.

The Professionals Online Safety Helpline (POSH): http://www.saferinternet.org.uk/about/helpline Tel: 0844 381 4772. This helpline supports professionals with an online safety concern or an online safety concern for children in their care. Professionals are able to contact the helpline to resolve issues.

Appendix 5 – definitions

Neglect, physical abuse, sexual abuse and emotional abuse.

Physical Abuse

A form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

May be recognised by: Children with frequent injuries, injury such as bruising, bite marks, burns and scalds, fractures but also by aggressive behaviour. It may also be an indicator of concern where a parent gives an explanation inconsistent with the injury or gives several different explanations for the injury.

Emotional Abuse

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

This may be recognised by: aggressive behaviour, appeasing behaviour, watchfulness or stillness, low self-esteem, withdrawn or a loner, or having difficulty in forming relationships.   Emotional abuse may be difficult to recognise as signs are usually behavioural rather than physical. Signs of emotional abuse may be associated or similar to other forms of abuse so presence of emotional abuse may indicate other abuse is prevalent as well.

Sexual Abuse

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

This may be recognised by: Inappropriate sexualised conduct, age inappropriate sexualised play or conversation, sexually harmful behaviour – contact or non-contact, self-harm, eating disorders, continual, inappropriate or excessive masturbation, anxiousness or unwillingness to remove clothes – sports / PE etc., pain or itching in genital area, blood on underclothes, bruising in genital region and / or inner thighs etc.

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Neglect

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

This may be recognised by: Being constantly hungry; constantly tired; have a poor state of clothing; be emaciated; have untreated medical problems; be frequently late or have poor or non-attendance at IAF; have low self-esteem; display neurotic behaviour and/or have poor social relationships, have poor personal hygiene. A neglected child may also be apathetic, fail to thrive, or be left with or in the care of adults under the influence of alcohol or drug misuse

Children with Special Educational Needs

Children with special educational needs (SEN) and or disabilities can face additional safeguarding challenges. Children with SEN and or disabilities are especially vulnerable when identifying concerns due to their impaired capacity to resist or avoid abuse. They may have speech, language and communication needs which may make it difficult to tell others what is happening. They may also sometimes not be believed because of their special educational needs or disabilities. We can never allow this to happen.

Additional barriers can therefore exist when recognising abuse and neglect in this group of children which include:
- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration;
- children with SEN and disabilities can be disproportionally impacted by things like bullying- without outwardly showing any signs.
- Communication barriers and difficulties in overcoming these barriers.

Racist, disability, homophobic, biphobic or transphobic abuse

Abuse of any form on the basis of any of these will not be tolerated; staff and volunteers need to be alert to link between differing types of abuse and behaviours, for example racism and extremist behaviour, particular in our region.

Staff need to be aware of what they need to do if they are concerned this is happening (i.e. complete a part one form) and what support will need to be put in place.

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Safeguarding Policy Statement

Introduction, Scope and Purpose

1. Safeguarding is an all-encompassing term used to describe many aspects of keeping our students safe, which includes:
   - Student health, safety and wellbeing
   - Child protection
   - Protection of adults at risk
   - Bullying, harassment and discrimination including racial abuse
   - Self-harm
   - Peer on peer/child on child abuse including sexual harassment and sexual assault
   - Abuse and neglect
   - Domestic violence
   - Safety from sexual exploitation, criminal exploitation, female genital mutilation and forced marriage
   - Criminal exploitation and county lines
   - Alcohol, drug and substance misuse
   - E-safety including all aspects of electronic communication
   - Financial exploitation
   - Protecting people from radicalisation and extremism
   - The security and safety of the College campus or place of learning

2. The policy covers all IAF students whether they are based at an IAF venue, on a visit, at a work placement or in workplace learning; it covers all aspects of a student's programme regardless of where it takes place. It is the responsibility of all staff to understand their role in supporting safeguarding across all aspects of provision and for familiarising themselves with the appropriate procedures and other policies that support this overarching document.

Key Principles

3. IAF will operate within the following key principles when it relates to safeguarding:

   - All people will be treated with respect and with courtesy by staff and students in an environment that is free from harassment or discrimination.
   - All training rooms, communal areas, facilities and equipment will comply with legislative health and safety standards.
   - IAF will work with students and other agencies to promote a safe and healthy culture.
   - IAF will develop partnerships to proactively protect students at risk of abuse, neglect or at risk of radicalisation.
   - IAF will have procedures in place to identify and respond to those students who might benefit from early help, recognising that the earlier help is in place the more effective it is for the individual.

- Staff will be trained and will have a clear understanding of personal safety and good safeguarding practices as well as what factors may make students vulnerable to a range of safeguarding concerns.
- IAF will work with students to promote their own personal health, well-being and safety including their safety online.
- IAF will work proactively to raise awareness of radicalisation and extremism in order to prevent people from being drawn into terrorism.
- Students will receive confidential advice, guidance and support for a range of issues that they may face. They will be signposted to external agencies where specialist support is required.

IAF will support students to have personal resilience and be able to make informed and sensible decisions about their safety and wellbeing in an attempt to prevent them from being exploited and or abused.

Students' Entitlement

4. In order to promote a healthy and a safe environment, our students will be entitled to the following:

- The right to make a disclosure to any member of staff and know that the disclosure will be dealt with quickly, sensitively and appropriately.
- To learn in an environment free from bullying or harassment.
- To be made aware of strategies and actions that to keep themselves safe whether in IAF, outside IAF or online.
- To be made aware of the basic principles of safe learning and safeguarding relevant to the programme that the student is completing.
- To be made aware of how to access support on personal health and safety issues either within IAF or from outside agencies.
- To be provided with up to date information around personal safety issues.
- The opportunity to comment and feedback on the extent to which IAF and courses promote and maintain well-being and personal safety.
- Learn about interpersonal and communication skills that promote and establish a welcoming, safe and respectful environment.

Strands of Activity

5. The safeguarding efforts of IAF are supported by the following core strands of activity, where relevant, working procedures and other policy documents have been signposted within this section.

Safe learning

6. The principles of the 'Keeping children safe in education' and safeguarding agendas will be embedded within IAF's teaching and learning practices and within the IAF's quality assurance and quality improvement frameworks. Safe recruitment practices will be implemented as outlined in the relevant section of this policy.

7. IAF is committed to engaging students on issues related to financial health, mental health and physical health – in order to improve their quality of life. The aim is to provide students with the tools to make healthy and safe decisions.

Safe environment

8. IAF will provide an environment that is safe and secure for all users, whilst at the same time is friendly and welcoming. Robust systems and processes will be in place for staff and student identification and for visitor registration. A culture of respect that is free from bullying and harassment will be engendered. Health and safety is of paramount importance and must never be compromised or short cut; as such all facilities and resources will comply with legislative requirements for health and safety.

9. IAF's commitment to the safe environment is enshrined within the following policy and procedure documents: the health and safety policy and manual; the IT acceptable use policy for students and the incident reporting procedures.

Safe recruitment

10. IAF will comply with best practice in the recruitment and training of its staff, in line with legislative requirements. Staff will undergo the appropriate pre-employment checks including DBS checks for their role where applicable, and undertake mandatory safeguarding training appropriate to their role. Staff will understand the Code of Conduct, and how not to put themselves in situations that compromise themselves or students. All new starters will receive an appropriate induction, including safeguarding training.

Safeguarding students

11. IAF has a legal obligation to protect young people and vulnerable adults from abuse. IAF has an appropriately trained DSL and other staff that form a 'safeguarding team' who will ensure that disclosures made by students are dealt with quickly, sensitively and appropriately. All staff will be trained in the appropriate response to a student disclosure and the correct procedure for dealing with concerns about a student. Teams will work with students to proactively protect them from abuse and neglect and prevent students being placed in an abusive situation.

12. IAF's commitment to the protection of young people and vulnerable adults is enshrined within the Safeguarding Procedure.

Preventing people from being drawn into terrorism

14. IAF has certain duties enshrined within the Counter Terrorism and Security Act 2015. All staff are aware of their *Prevent* duties and IAF has robust processes in place to respond to concerns about students and staff members. The Prince's Trust Team programme enables students to explore and discuss issues in a safe and open environment.

15. IAF's commitment to *Prevent* is encapsulated within the *Prevent* policy, risk assessment and action plan and has been incorporated into the IT acceptable use policy and safeguarding procedures.

Links with external agencies

18. IAF works with Local Safeguarding Children Partnership, the Local Authority Designated Officer, the Multi Agency Safeguarding Hub and other professionals to ensure a comprehensive safeguarding network is in place. Advice will be taken from professionals within these organisations as appropriate.

19. IAF will work proactively with the regional Prevent coordinators and where appropriate the local steering group and Channel panel.

Key Responsibilities

The Corporation Board – will have overall responsibility for ensuring that IAF meets its obligations within this area. They will be responsible for the approval of relevant safeguarding policy.

The DSL – will be the QTLP and Teaching Delivery Manager. They will be responsible for ensuring that the safeguarding processes and procedures are robust and consistently applied and that IAF fulfils its legal duties as enshrined within legislation. They will be the first point of contact for complaints made against staff and will liaise with the Local Area Designated Officer on all such matters.

The Director– is responsible for ensuring that safe recruitment practice is embedded and implemented across IAF, that the single central record is accurately maintained and that all staff have received appropriate training and development.

The IAF Senior Management Team – will be responsible for ensuring that all staff have an understanding of safeguarding and have received appropriate training and development and that the staff recruitment and selection procedure is followed at all times. They will ensure that safeguarding is given high priority within their teams.

All employees - will have a responsibility for completing their training, familiarising themselves with *Keeping children safe in education: safeguarding information for all staff* the Safeguarding Procedure, the *Prevent* Policy and any other related safeguarding policies and procedures. They are also responsible for ensuring they understand their own role in the promotion of safeguarding and the appropriate action to be taken should they receive a disclosure or have concerns about a student.