



Child & Adult Protection and Safeguarding Policy

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1. Key Contacts for Safeguarding, Child & Adult Protection at the College

Designated Safeguarding Lead

| | |
|---------------|---------------------------------|
| Name | Michelle Smith |
| Contact email | michelle@libertygrouppltd.co.uk |
| Telephone | 01843 446 906 07946032122 |

Deputy Designated Safeguarding Leads

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|---------------|-------------------------------|
| Name | Lauren Lawley |
| Contact email | lauren@libertygrouppltd.co.uk |
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| Name | Jojo Rassekh |
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| Telephone | 01843 446 906 07976620827 |

Pastoral Staff

| | |
|---------------|---------------------------------|
| Name | Michelle Smith |
| Contact email | michelle@libertygrouppltd.co.uk |
| Telephone | 01843 446 906 07946032122 |

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| Name | Lauren Lawley |
| Contact email | lauren@libertygrouppltd.co.uk |
| Telephone | 01843 446 906 |

Mental Health Lead

| | |
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| Name | Michelle Smith |
| Contact email | michelle@libertygrouppltd.co.uk |
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Designated Looked After Children Lead

| | |
|---------------|------------------------------|
| Name | Jojo Rassekh |
| Contact email | jojo@libertygrouppltd.co.uk |
| Telephone | 01843 446 906 07976620827 |

Nominated Director for Safeguarding

| | |
|---------------|---------------------------------|
| Name | Michelle Smith |
| Contact email | michelle@libertygrouppltd.co.uk |
| Telephone | 01843 446 906 07946032122 |

Local Authority Designated Officer (LADO)

| | |
|-----------|-------------------------------|
| Email | kentchildrenslado@kent.gov.uk |
| Telephone | 03000 410 888 |

Local authority safeguarding contact numbers and emails

The Education Safeguarding Service Area Office - Thanet: 03301 651140

Social Services - During Office Hours

Telephone: 03000 411 111 (under 18) or 03000 416 161 (over 18)

Contact Email: social.services@kent.gov.uk

Social Services - Out of Office Hours

Contact: 03000 419 191

Police

Contact: 101 or 999 in an emergency.

If a child may be at risk of imminent harm, call the Integrated Front Door on 03000 411 111 (outside office hours - 03000 419 191) or the Police on 999.

If you are concerned about extremism in college, or if you think a child might be at risk of extremism, contact the helpline on 020 7340 7264 or counter.extremism@education.gov.uk

2. Purpose of Policy

Liberty College fully recognises its responsibilities for safeguarding learners. Our learners' welfare and safety are at the heart of our college's ethos and in everything we do. We believe that all learners have the right to be safe in our society. Therefore, we recognise that we have a duty to ensure arrangements are in place for safeguarding and promoting the welfare of learners by creating a positive college atmosphere through our teaching and learning, pastoral support and care for both learners and college personnel, training for college personnel and with working with parents/carers. We teach all our learners about safeguarding.

Liberty serves learners up to the age of 25, thus in this policy, a 'learner' means all children and young people below 25 years of age.

In accordance with relevant law and guidance this policy details our procedures for safeguarding and child protection.

It is applicable to the whole college community.

Safeguarding and promoting the welfare of children is everyone's responsibility, whether they work or volunteer in the college. Everyone has a role to play in child protection and safeguarding. The college - where appropriate - adopts a whole-college approach to safeguarding children.

All staff and volunteers will ensure that their approach and actions are child-centred— putting the wishes and feelings of victims at the heart of any safeguarding response. This means that they'll consider, at all times, what is in the best interests of the child.

We will work together with our three safeguarding partners (Local Authority, Clinical Commissioning Group, and Chief of Police for our LA area) to safeguard and promote the welfare of local children, including identifying and responding to their needs.

These are the foundations on which all of Liberty's safeguarding, child protection, and welfare systems are built:

- Ensuring that all staff and volunteers understand their responsibilities with regard to safeguarding and child protection.
- Ensuring that all staff are trained to understand the risk factors for all child protection, safeguarding and welfare concerns and know the indicators of abuse, neglect, and exploitation, and know the appropriate reporting mechanism.
- Creating and maintaining an environment where all learners feel secure, are encouraged to communicate, and are listened to.
- Ensuring that every learner understands that they can report any concern to any member of staff, knowing they will be believed and never made to feel like raising a concern is a problem. We have posters around the college site, so that the contact details are always available. This can be found in Appendix 4.
- Ensuring that staff listen to victims well and know how to report any concerns about sexual violence or harassment between peers.
- Having a procedure to deal with any issues of peer-on-peer abuse which includes a robust and credible reporting system which is well-promoted, accessible, and simple to understand.
- Ensuring a zero-tolerance attitude towards any form of peer-on-peer harassment or sexual violence, and appropriate responses to issues we encounter – and never adopting the attitude that sexualised harassment is "just banter" or "boys being boys".

- Ensuring all staff understand that, even when it isn't formally reported, harassment and sexual violence is happening.
- Teaching learners to keep themselves safe, including online, from all forms of abuse, bullying, harassment, or exploitation.
- Swiftly and effectively addressing any child protection or safeguarding concerns and ensuring robust, timely referrals are made to other agencies in line with local safeguarding protocols. We have a flowchart explaining how to report concerns displayed as a poster in the staff areas around the college site, so that the details are always available. This can be found in Appendix 5.
- Ensuring effective links with relevant agencies in all matters regarding safeguarding and child protection, including Early Help procedures.
- Supporting learners who are subject to child protection plans and contributing to the implementation of the plan.
- Ensuring that the cohort of learners who have a social worker, or have been or are currently looked after, are supported to stay in education and achieve good educational outcomes.
- Keeping meticulous, written records of concerns about learners, even where there is no need to refer the matter immediately (this includes recording dates, times, people responsible, and actions), and ensuring all records are kept securely and shared appropriately, through CPOMS.
- Ensuring the suitability of all staff through safe recruitment practice and maintaining an accurate and up-to-date Single Central Record.
- Maintaining clear procedures in line with the latest guidance for reporting allegations against staff members.
- Ensuring that parents and carers also have an understanding of the responsibility placed on the college and its staff for safeguarding and child protection.
- Maintaining awareness of those learners who are persistently absent or missing from college, notifying the Local Authority in line with 'Children Missing in Education' protocols.

Furthermore, Liberty recognises that:

- Some learners are at increased risk of abuse.
- Some learners face additional barriers with respect to recognising or disclosing abuse.

The college is committed to recognising diversity and ensures anti-discriminatory practices. We ensure that all learners have the same protection. We give special consideration to learners who:

- Have special educational needs (SEN) or disabilities (further information is in Section 20).
- Are young carers.
- Show signs of mental health problems.
- Are missing education.
- May experience discrimination due to their race, ethnicity, religion, gender identification, or sexuality.
- Are at risk of FGM, sexual exploitation, forced marriage, or radicalisation.
- Are asylum seekers.
- Have English as an additional language.
- Are known to be living in difficult situations e.g. where there are issues at home, such as substance abuse/misuse, domestic abuse, or where a family member is in prison or has mental health needs.
- Are at risk due to either their own or a family member's mental health needs.
- Are within the care system and are looked after or have been previously looked after or have a social worker.
- Have a parent/carers who has expressed an intention to remove them from college.

3. Safeguarding Children

Liberty recognises that safeguarding covers a broad range of areas, and it aims to achieve the following:

- Protecting learners from maltreatment.
- Preventing impairment of learner's mental and physical health and/or development.
- Ensuring learners are growing up in circumstances consistent with the provision of safe and effective care.
- Enabling learners to have optimum life chances, so they can enter adulthood successfully.
- Taking action to enable all learners to have the best outcomes.

Child protection refers to activities undertaken to prevent children suffering, or being likely to suffer, significant harm.

As part of meeting a learner's needs, Liberty:

- Recognises that sharing information, particularly with safeguarding partner agencies and other professionals, in a timely manner is crucial in identifying and tackling all forms of abuse and neglect.
- Knows that fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety, of learners. The Data Protection Act (DPA) 2018 and GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe. The college recognises the government's seven golden rules of information sharing. Where any doubt exists, staff will seek support from the DSL.
- Recognises that, to facilitate the sharing of 'special category personal data,' the DPA 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information without consent. If it is not possible to gain consent, or if to gain consent would place a learner at risk, it cannot be reasonably expected that a practitioner gains consent.
- Recognises the importance of confidentiality in all data the college holds and in particular in relation to safeguarding and child protection records.
- Will identify learners who may benefit from the Early Help process and make timely disclosures to the Local Authority to enable that process to begin, working with safeguarding partners and other professionals to assist with these assessments and work flowing from these assessments.
- Recognises that mental health issues can be an indicator of abuse and neglect and will share any such concerns appropriately.
- Will identify learners who may be suffering from significant harm and make child/adult protection referrals
- Will identify learners who need extra help and make appropriate referrals, including to early help processes, to prevent concerns escalating.

Liberty understands the importance of contextual safeguarding, i.e. that incidents or behaviours can be associated with factors outside home or college and can occur between children outside of college. All staff should be considering wider environmental factors that are present in a learner's life which are a threat to their safety and/or welfare. This information will also form part of any referrals the college makes, if the college considers this appropriate.

Liberty also recognises the importance of partnership working to keep learners safe and works with the [Kent Safeguarding Children Multi Agency Partnership](#) and [Kent support level guidance - Kent Safeguarding Children Multi-Agency Partnership \(kscmp.org.uk\)](#), along with the Education Safeguarding Service – Thanet Area Office - [Safeguarding Contacts | The Education People](#)

4. Legislation and Guidance

This policy for Liberty is derived from a variety of legislative provisions and statutory guidance. In particular, it is based on good practice found in:

- [Keeping Children Safe in Education \(2021\).](#)
- [Working Together to Safeguard Children \(2018\).](#)
- [Governance Handbook.](#)

Our safeguarding policy and procedures comply with all of this guidance and is updated with local arrangements agreed and published by the three local safeguarding partners.

The following legislation is also incorporated into this policy:

- The Children Act 1989 (and 2004 amendment), which gives a broad framework for the care and protection of children and includes provisions for Local Authority inquiries, care proceedings, and emergency provisions.
- Female Genital Mutilation Act 2003 S 5B(11), as inserted by section 74 of the Serious Crime Act 2015, places a statutory duty on teachers to report to the police where they discover/find that female genital mutilation (FGM) appears to have been carried out on a girl under 18. Responsibilities for safeguarding and supporting girls affected by FGM are found in Statutory Guidance on FGM.
- The Rehabilitation of Offenders Act 1974 which outlines provisions for when people with criminal convictions can work with children.
- 'Regulated activity' in relation to children is found in Schedule 4 of the Safeguarding Vulnerable Groups Act 2006.
- "PREVENT" duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism can be found in: Statutory Guidance on the Prevent Duty.

Other statutory provisions and guidance relevant to child protection and safeguarding include:

- The Education Act 2002 (Section 175).
- The School Staffing (England) Regulations 2009 Schedule 2, which covers information which must be entered into the Single Central Register, and Section 9, which stipulates that at least one person per interview panel must be trained in safer recruitment.
- The Education (Learner Information) (England) Regulations 2005.
- The Sexual Offences Act, 2003, Home Office.
- Teaching Online Safety in Colleges, 2019, DfE.
- Guidance on Sharing Information.
- Guidance on Peer-on-Peer Sexual Abuse.
- Guidance on Nudes and Semi-Nudes.
- Teaching Standards.

Liberty has also read and incorporated Ofsted's review of sexual abuse in schools and colleges published in June 2021 into this and connected policies and procedures.

A full list of the guidance this policy has referred to, and which staff can refer to for further information, can be found in Appendix 2: 'Guidance Documents'.

Academies, free, and independent colleges

The duty for all academies - including free colleges and all independent colleges - to safeguard and promote the welfare of learners at the college is set down in Part 3 of the schedule to the [Education \(Independent College Standards\) Regulations 2014.](#)

Liberty's policy reflects these duties and complies with our funding agreement and articles of association.

Related Policies

Safeguarding covers more than the contribution made to child protection in relation to individual young people. It also encompasses issues such as staff conduct, health and safety, bullying, online safety, arrangements for meeting medical needs, providing first aid and/or intimate care, drugs and substance misuse, positive behaviour management, and the use of physical intervention and restraint.

This document must therefore be read, used, and applied alongside the college policies and procedures referred to below:

- The Single Central Record of identity, qualification, and vetting checks for all staff and volunteers.
- The staff safer recruitment and selection processes.
- Local Authority policies and procedures on dealing with allegations against members of staff.
- Acceptable Internet Use Policy & Agreement
- Staff code of conduct
- Data Protection & GDPR Policy
- Admission & Attendance policy and Attendance Procedure.
- Learner Behaviour policy.
- Anti-Bullying Policy.
- Anti-Cyber Bullying Policy
- Equality & Diversity Policy.
- Confidentiality Policy.
- Health and Safety Policy.
- Accident & Emergency Procedure
- The Whistleblowing Policy.

5. Responsibilities

Liberty recognises that safeguarding and promoting the welfare of children is everyone's responsibility. Everyone who comes into contact with children and their parents, those with parental responsibility or carers has a role to play in safeguarding children.

All staff must read Part One and Annex B of KCSIE 2021.

All staff must:

- Provide a safe environment in which children can learn.
- Be able and prepared to identify any child in need of early help.
- Be able to reassure victims that they are being taken seriously and will be supported and kept safe. Staff should never give the impression that reporting abuse causes problems, and victims should not feel ashamed.
- Be aware of the role of the DSL, including how and when to contact them.
- Follow the college's reporting structures for safeguarding concerns which reflect those outlined in KCSIE 2021.
- Be able and prepared to deal with any safeguarding concern including knowing who to speak to and understand how to deal with sharing information and confidentiality issues.
- Be aware of, and act on, the contents of (a) this Child Protection Policy which covers all peer-on-peer abuse; (b) the Behaviour Policy (which includes measures to prevent bullying, including cyberbullying, prejudice, and discriminatory bullying); (c) the college's Online Safety Policy. In addition, staff must be aware of and understand the Code of Conduct for Staff.
- Receive appropriate training about safeguarding and child protection (including online safety), which is updated via email or bulletins at least annually or as required.

- Understand the child protection process, including Section 17 and Section 47 of the Children's Act 1989 and multi-agency meetings, and be aware of local arrangements for the early help process (sometimes referred to as the common assessment framework), understanding their role in each.
- Be aware of what to do if a child tells them about being abused, neglected, or exploited.
- Be able to recognise physical abuse, emotional abuse, sexual abuse, and neglect, as well as safeguarding issues surrounding child sexual exploitation (CSE), child criminal exploitation (CCE) including county lines, peer-on-peer abuse, serious violence, Prevent-related issues, and female genital mutilation (FGM) - AND understand that often safeguarding issues overlap.
- Be aware that safeguarding concerns can be linked to or caused by factors in a child's wider environment outside of the family, such as sexual and criminal exploitation, and serious youth violence. This is often referred to as contextual safeguarding.
- Be aware that mental health issues can be a significant indicator of abuse or neglect.
- Be able to report concerns about safeguarding arrangements within their college and know not to hesitate before doing so.
- Know what to do if a child is missing from education.

Further information to support staff to fulfil these responsibilities is contained throughout this policy and is covered in the college's safeguarding and related training programme.

The Directors will, as part of their responsibilities:

- Have strategic leadership responsibility for safeguarding in the college.
- Will ensure that the college is compliant with all duties under legislation and statutory guidance such as KCSIE 2021. This includes making sure that policies, procedures, and training are effective.
- Ensure that a DSL is appointed from the college's SLT who has the status and authority to carry out all of the DSL duties. Directors will also ensure the DSL has the time, training, and funding to carry out the role.
- Together with senior teams, especially the DSL, the Directors will ensure that all staff read Part 1 of KCSIE 2021.
- Together with senior teams and the DSL, the Directors will ensure all staff are appropriately trained in child protection and safeguarding issues (including online safety) both at induction and on an ongoing basis.
- Ensure that there is a whole-college approach to safeguarding, i.e. safeguarding and child protection should be at the front of thinking and should underpin relevant policies and procedures. Policies and procedures should all operate with the best interests of the child at their heart. They will further ensure that teaching safeguarding to children (including online safety) is integrated into the curriculum.
- Ensure that the college creates a culture that safeguards and promotes the welfare of children. This includes ensuring unsuitable people are not employed by the college and ensuring compliant safer recruitment practices are in place, e.g. making sure that those involved in recruitment are trained in safer recruitment.
- Ensure policies, procedures, and mechanisms are in place to fulfil safeguarding responsibilities to those learners who are "looked after".
- Ensure the college has effective policies on a range of safeguarding related areas (in line with all good practice and KCSIE 2021 - in particular, paragraph 85) including:
 - Child protection and safeguarding (including paragraph 145 in respect of information about peer- on-peer abuse).
 - Learner Behaviour Policy.
 - Staff Code of Conduct.
 - Appropriate safeguarding arrangements for those who go missing from education.
 - Low level concerns/handling allegations against staff where the threshold is not met.
- Ensure that the college has systems for dealing with safeguarding issues which are "well promoted, easy to understand and easily accessible for children confidently to report abuse, knowing their concerns will be treated seriously, and knowing they can safely express their views and give feedback".

- Ensure that these policies and procedures reflect the challenges SEND children can face in terms of safeguarding -e.g. communication barriers and increased risk of bullying - and allow for identification of any mental health issues that children may be experiencing.
- Ensure, when fulfilling their responsibility to teach children about safeguarding including online safety, that this learning is, where necessary, tailored and contextualised for individuals including more vulnerable children, victims of abuse and some SEND children.
- Ensure they are aware of and understand local arrangements for safeguarding and the college contributes to multi-agency working.
- Ensure that training for teaching staff reflects the Teaching Standards' expectations around managing behaviour effectively.
- Ensure that the college has appropriate filters in place to keep children safe online whilst ensuring that filters are not unreasonable.
- Ensure child protection files are maintained properly (Annex C of KCSIE 21 has a detailed list of this requirement).
- Ensure that the college recognises the importance of sharing information to keep children safe.
- Ensure the college has appropriate safer recruitment policies and procedures in place (see Part 3 of KCSIE 21).
- Ensure that the college has more than one contact number for children (i.e. so that a child missing who is also a safeguarding concern has more than one responsible adult the college can contact).
- Ensure that members of the organisations that form Liberty Group adhere to the college safeguarding requirements while on college premises.
- Assess the impact of this policy in keeping children safe.
- Appoint a nominated Director to liaise with the Designated Safeguarding Lead (DSL) on safeguarding issues.
- Review and annually approve the safeguarding policy, ensuring it complies with all law, regulations, and good practice. They will also hold the Directors to account for its implementation.
- Receive any allegations made against Directors (How to Report Concerns Flowchart, Appendix 5).

All Directors must read Keeping Children Safe in Education 2021.

The Designated Safeguarding Lead, who is a member of the SLT, is the lead for child protection and safeguarding in the college. This is one part of their responsibilities for safeguarding and child protection, which also include:

- Having the appropriate status and authority to carry out their role – deputies must be trained to the same standard as the DSL.
- Having the time, support, training, funding, and resources to be able deliver all their functions as a DSL.
- Delegating certain functions (except lead responsibility) to the deputies, and deputies can be contacted when the DSL is away or absent from college.

The role of DSL includes:

- Being available in term time- this can (in exceptional circumstances) be via Skype or other media if they are not physically in college during term time for staff, volunteers, parents, or learners to provide advice and support on child welfare, safeguarding, and child protection matters.
- Being the point of contact for staff who have a concern about a child's welfare, safeguarding, or a child protection issue, including where the concern involves a mental health issue.
- Acting as a point of contact for safeguarding partners - for example, the police in relation to Operation Encompass - and, where required, taking part in, and contributing to strategic discussions and inter-agency meetings, and supporting other staff to engage with this process'.
- Liaising with other staff (as needed) - for example, pastoral leads or senior mental health leads- when referring matters to children's social care, so that the reports are as holistic as possible.
- Ensuring that account is taken of the risk to children outside of their families and considering whether children are at risk of abuse relating to exploitation and serious violence.

- Where a safeguarding concern has a mental health element, ensuring discussions are had with the senior lead for mental health.
- Managing referrals to the Local Authority Children's Services or other services (such as the police where a crime has been committed), or to the Channel programme, or the DBS (where someone has been dismissed or has left because of the harm they have caused or the risk of harm they pose to children).
- Liaising with other agencies and partners in cases where early help is considered the most appropriate response and contributing to any ongoing support and further assessments.
- Working closely with children's social care and any child's social worker – in particular where there is a statutory response and ensuring that actions the college proposes to take do not jeopardise an ongoing investigation.
- Where children's social care do not investigate, the DSL should not be afraid to refer again or challenge the decision. If the decision remains not to investigate, the DSL should look for other support such as early help.
- Where there has been an allegation/report of sexual violence, the DSL will support by advising the college how to proceed, including undertaking an immediate risk assessment of need (risk assessments should be considered on a case-by-case basis for reports of sexual harassment). The risk and needs assessment should include:
 - The victim and how best to support them.
 - Whether it is a single victim.
 - The alleged perpetrator.
 - Risks to other children.

The risk assessment must be dynamic and retained in electronic form.

- Taking the lead role in any decisions about sexual violence or sexual harassment which are reported to the college.
- Where an allegation is proved to be unsubstantiated, unfounded, false, or malicious, the DSL will consider whether the person who made the allegation is in need of support for other abuse – and whether the report could be a cry for help. If so, the DSL should consider whether or not to refer to children's social care.
- Where there has been an allegation against a member of staff which is judged to meet the threshold (for referral to the LADO), ensuring the child is not at risk and determining whether or not the case should be referred to children's social care as a suspected abuse case.
- Being aware of local protocols and arrangements in respect of the Prevent referrals.
- Being aware of local arrangements for Early Help.
- Being aware of all the local and national support systems in place for victims of sexual violence.
- Being the point of contact for all peer-on-peer reports and being aware of issues and supporting actions where consent or power balances are in issue - for example, in sexual violence reports.
- Making referrals (where appropriate) to the Cyber Choices programme when a child may be involved in cybercrime.
- Where a member of staff reports FGM, deciding whether or not to refer the matter to children's social care.
- Encouraging a culture of supportive engagement with parents/carers around safeguarding and child welfare – this is especially so in circumstances where the family may be encountering challenging circumstances.
- Ensuring children's views are heard by encouraging a culture of listening, taking account of their wishes and feelings, and building trust between children and staff so that communication and reporting issues is most effective.
- Working with a range of colleagues to promote the educational outcomes of 'children in need' by understanding the extra challenges this cohort can face because of the safeguarding/welfare or child protection issues they have been involved in.
- Thinking about how the issues can affect attendance, engagement, and achievements for children.
- Knowing the cohort of learners who have or have had a social worker and ensuring their academic progress, attainment, and aspirations.
- Supporting teaching staff to help with any reasonable adjustments or extra support to assist the above group, recognising that even where statutory services support has ended, there can be long term consequences for the child.

- Sharing information (as appropriate) with staff to achieve these goals for this cohort.
- Providing support for staff so that they are confident about welfare, safeguarding, and child protection issues - including during a referral process - and helping them to see the links between safeguarding and academic/pastoral support.
- In relation to child protection files the DSL must:
 - Keep clear, accurate, up-to-date records of any concerns, actions taken, and how these were followed up. The DSL will also support staff to keep records in this way. Records must be held securely and only shared with those who need to know – in line with data legislation and regulations.
 - Hold files separately from the main file. Transferring them to a new setting as soon as possible and no longer than 5 days after the transfer, or 5 days after the start of a new term if the transfer is not in term time. The DSL must obtain a receipt for the file.
 - Consider whether or not it is appropriate to inform a new setting that a child is involved in a Channel programme.
 - Have details of the local authority Personal Advisor appointed to guide and support a care leaver and liaise with them as necessary regarding any issues of concern affecting the care leaver.
 - Where a perpetrator transfers settings, make the new setting aware of potential risks, protective factors, and any ongoing support the child is receiving.

In relation to policies and procedures, the DSL must ensure that:

- The college's child protection policy and procedures are reviewed annually and always remains up to date – working with staff to achieve this.
- Staff have access to and understand the college's child protection policy and procedures, and it is available publicly to parents, who should also be made aware of the college's role in the child protection process.
- Staff are aware of local safeguarding arrangements.
- The DSL should also receive appropriate training (including Prevent) to undertake all their role and responsibilities, and this includes:
- Understanding about specific needs that can increase vulnerability as well as specific harms that put children at risk.
- Understanding the assessment process for referrals to LA, including those relating to early help and child protection.
- Attending conferences so that they can be an effective participant in the process(es) and understand the importance of information sharing with other agencies.
- Understanding how important their role is for providing information to children's social care so that children can be safeguarded, and their welfare promoted.
- Understanding the effect adverse childhood experiences and trauma can have on children, including the impact it can have on behaviour, mental health, and educational outcomes.
- Understanding and being alert to the specific vulnerable groups such as children in need, with SEND, or with other health conditions.
- Supporting the college with fulfilling its Prevent duty and stay up to date with the latest guidance in relation to Prevent.
- Being aware of local protocols and how to use them – for example, when contacting the police about a serious violent sexual offence such as rape.
- Being aware of the contact details for the local housing authority so that any issues of homelessness can be referred correctly and swiftly.
- Understanding the risk for children posed by online activity, and the risk for specific groups, such as those with SEND.
- Understanding the barriers that stop children from reporting issues and how to build trust to help with this.
- Building a culture of listening and making sure the wishes and feelings of the children are considered and encouraging staff in the measures the college may put in place to promote this.
- Having the ability to keep accurate, detailed, secure written records of safeguarding and welfare issues.

6. Child Protection and Safeguarding Procedures

Where there is a child protection or safeguarding concern about a Learner

All staff at Liberty will follow the necessary child protection procedures if an incident occurs.

If a DSL or deputy is not immediately available

- Where a child is in immediate danger or at risk of significant harm, and the DSL or senior leader is not available, a referral should be made to children's social care and/or the police immediately.
- Anyone can make a referral to the police in an emergency, or to children's services if there is a child protection or safeguarding concern.
- Where staff have a concern about a learner that does not raise an issue of either immediate harm or a risk of significant harm, the staff member should not delay but, in the first instance, speak to a member of the SLT or contact the Local Authority children's services to determine the most appropriate way to proceed.
- [This link](#) will take you to the local referral arrangements in your area.
- Staff **should not assume** that somebody else will take action/share information that might be critical in keeping children safe.
- Where referrals are not made by the Designated Safeguarding Lead, the Designated Safeguarding Lead should be informed, as soon as possible, that a referral has been made.
- Teaching staff and other designated professionals are responsible for reporting concerns relating to **FEMALE GENITAL MUTILATION (FGM)** and reporting is mandatory where either the individual:
 - Is informed by a girl under 18 that an act of FGM has been carried out on her; or they
 - Observe physical signs which appear to show that an act of FGM has been carried out on a girl under 18 and they have no reason to believe that the act was necessary for the girl's physical or mental health or for purposes connected with labour or birth.

They can also discuss the concern with the DSL, who will offer support and help.

Where the DSL is available and a member of staff at Liberty suspects that any learner may have been subject to abuse, neglect, or exploitation – or a learner has suggested that abuse has taken place - the Designated Safeguarding Lead (DSL), or the Deputy DSL if the DSL is off site, must be informed immediately.

The DSL or Deputy DSL will:

- Ensure the allegation is acted on immediately, no later than within the same college day.
- Determine the most appropriate course of action:
 - Where the allegation reveals a risk of significant harm or the learner is in immediate danger, the DSL will refer the matter to the police and/or children's social care. Children's social care should respond within 1 day. There are a range of responses available to social care. If the concern meets their threshold for intervention, children's social care will begin assessments and investigations under the Care Act 1989 (normally under Section 17 or 47). It may be that the DSL or a member of staff will be asked to be involved in these assessments – if this is the case, the DSL will offer support to all members of staff.
 - Where the risk is considered to be less serious, the DSL may start the procedure for Early Help. This may be a multi-agency response, and the college may be asked to lead on this process as the lead professional. Staff may be asked to have input in this process. If, at any time during Early Help, those involved consider the risk to the learner has escalated, the matter must then be referred to children's social care.

Allegations or concerns about serious peer-on-peer abuse which require a safeguarding or child protection response (rather than being dealt with under the college's behaviour policy)

- In the case of a violent sexual assault or sexual harassment, Liberty will follow the latest procedures as set out in Part 5 of [Keeping Children Safe in Education 2021](#)
- Staff must record the allegation and report it to the DSL immediately, but not investigate it themselves.
- The DSL will contact the Local Authority children's social care team and follow its advice, as well as the advice of the police, if the allegation involves a potential criminal offence.
- The DSL will put a risk assessment and support plan into place for all children involved (including the victim(s), the child(ren) against whom the allegation has been made, and any others affected) with a named person they can talk to if needed. Where there is a report of sexual harassment, the need for a risk assessment will be considered on a case-by-case basis.
- The DSL can, where appropriate, contact the children & adolescent mental health services (CAMHS).

Where a learner's behaviour causes significant harm to other learners, staff should follow the child protection procedures for the college. The DSL will refer the child in line with the local area safeguarding protocol for these children.

Where the issue involves 'sharing nude or semi nudes' (also known as sexting) by using online communications, text, or image messaging, please refer to the online safety policy. The Child Exploitation Online Protection Centre (CEOP) also provides further guidance on sexting at <https://www.ceop.police.uk/safety-centre/>. Other guidance is available: <https://www.gov.uk/government/publications/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people>

Where there is an issue relating to radicalisation or extremism

- The DSL will be the first point of contact for any issues of concern in relation to extremism.
- If the DSL is not available, staff should speak with a member of the SLT or children's social care. If it is an emergency situation, the member of staff should call 999 or the confidential anti-terror hotline: 0800 789321.
- There is also a dedicated phone line at the Department of Education which offers help and guidance to staff: call 0207 340 7264 or email counter.extremism@education.gov.uk.
- The DSL will assess the level of risk and decide which agency to make a referral to. This could include [Channel](#) - the government's programme for identifying and supporting individuals at risk of being drawn into terrorism - or the local authority children's social care team: [Request for Support - Professionals \(kent.gov.uk\)](#)

Where a learner is identified as being at risk of exploitation, radicalisation, FGM, peer-on-peer sexual abuse, or becoming involved in serious violent crime

Where risk factors (such as a child with a mental health need, a parent in prison, persistent absences from college, or a risk of FGM) are present but there is no evidence of abuse or a particular risk, the DSL at Liberty will advise staff on preventative work that can be done either within the college or together with partners. This is often referred to as Early Help.

The DSL may decide to notify the Multi-Agency Safeguarding Hub (MASH) so that a strategic overview can be maintained and any themes or common factors can be recognised. The college will set timelines, monitor and review the situation, and take appropriate steps or seek advice as required.

The DSL may also seek advice about undertaking an early help assessment and/or making a referral to social services or involving the Local Safeguarding Children's Partnership. If, during or after assessment, the concerns about the learner turn out to be more significant and meet the additional needs/complex need criteria, the DSL will refer the matter to the MASH.

It may be appropriate to speak with the learner's family. The DSL will take this decision and may well be the person who talks to the learner's family.

7. Allegations Against Members of Staff

Where an allegation of abuse is made against a member of staff (including supply teachers and volunteers) in relation to a learner, it must be brought to the attention of the Directors immediately. In line with KCSIE 2021, the college has two levels of allegation management. The first is allegations which meet the threshold, and the second is in relation to low-level concerns.

Where the allegation meets the threshold, the Director will act as the “case manager”. They will conduct basic enquiries to ascertain whether there is any foundation to the allegation and will liaise with the LADO and other authorities as appropriate. The case manager will follow the procedure detailed at [Part 4 of KCSIE 2021](#)

In the event the headteacher is the subject of the allegation, the DSL will report to the Directors immediately, and the Director will assume the role of “case manager”.

The threshold may be met in the following circumstances:

- They have behaved in a way that has harmed a child or may have harmed a child.
- They possibly committed a criminal offence against or related to a child.
- They have behaved towards a child or children in a way that indicates they may pose a risk of harm to children.

They have behaved towards a child or children in a way that indicates he/she/zie is unsuitable to work with children.

This includes behaviour outside of college that might make the person unsuitable to work with children (known as a transferable risk).

In some cases, allegations may be so serious that they will require immediate intervention by the police and/or children’s social care services. If this is the case, the Director will ensure that the appropriate action is taken.

Low-level concerns are those which do not meet the threshold for referral to a LADO or the police but, as part of an open culture to safeguarding, should be talked about. Everyone is encouraged to report low level concerns, even by way of a self-referral, so that inappropriate or concerning behaviours are dealt with early and professional boundaries are maintained.

A low level of concern would be where, for example, a member of staff behaved in a way that is inconsistent with the staff code of conduct, but it isn’t considered serious enough to refer to the LADO such as a staff member being over-friendly with children, using inappropriate language, favouring a child or picking on a child, making inappropriate social media posts, making fun of a child’s work, making fun of a child in front of other children, or accompanying a child home from an event alone (albeit with the parent’s consent).

Low-level concerns will be dealt with efficiently and appropriately in line with the Staff Code of Conduct and, where appropriate, any other relevant college policy – for example the data protection policy.

In the event of a low-level concern being raised with the Director, they will:

- Collect evidence from witnesses and from the person concerned.
- Collate the information and advise what actions should be taken – this could range from a conversation with the person to a warning or formal disciplinary proceedings.
- Keep a record of the concerns.

All information will be held in confidence and securely, in line with data protection laws (the Data Protection Act 2018 and UK GDPR).

Records will be reviewed regularly to identify any patterns or systematic issues within the college. Patterns of staff behaviour could result in a more serious concern that meets the threshold test or results in disciplinary action for an individual. Records will be maintained in line with Liberty's Data Retention Policy.

Suitability of staff and safe recruitment practices

The college recognises that safe recruitment practices are an essential part of creating a safe environment for children and young people. Consequently, we will ensure that staff (including supply teachers) and volunteers working at the college are suitable to do so and therefore do not pose any kind of risk to our learners.

Appropriate members of the Senior Leadership Team (SLT), Directors, and other relevant staff are required to complete Safer Recruitment Training in order to ensure that one panel member on every selection panel is trained in 'Safer Recruitment'.

8. Complaints and Whistleblowing

Where a staff member at Liberty feels unable to raise an issue with the college or feels that their genuine concerns are not being addressed, other whistleblowing channels may be open to them.

Liberty's Whistleblowing Policy can be found on their website www.libertygrouppltd.co.uk.

General guidance on whistleblowing can be found on the [government website](#).

The NSPCC's "What You Can Do to Report Abuse" dedicated helpline is available as an alternative route for staff who do not feel able to raise concerns regarding child protection failures internally or have concerns about the way a concern is being handled by their college. Staff can call 0800 028 0285, which is available from 8:00am to 8:00pm, Monday to Friday, and email help@nspcc.org.uk.

9. Training

Liberty ensures all staff complete safeguarding and child protection training as part of their induction. This includes online safety and whistleblowing procedures and is designed to ensure all staff:

- Understand the college's safeguarding systems and
- Their responsibilities, and
- Can identify signs of possible abuse or neglect or exploitation,
- Know how to act upon any concerns they have.

All training is integrated, aligned, and considered as part of the whole-college safeguarding approach, including training on the issues and expectations in relation to allegations of peer-on-peer abuse. Training is considered as part of wider staff training and curriculum planning.

All training is in line with expectations and arrangements from our local safeguarding partners. It is also designed to support teachers to fulfil expectations through the Teachers' Standards in respect to managing behaviour in the classroom and having a clear understanding of learner needs.

The college also has a commitment to updating safeguarding training (including online safety) for all staff annually, and more regularly as required, through e-bulletins, CPD, or using the knowledge base of local partners or staff members (e.g. the Senior Mental Health Lead or members of our pastoral team).

To achieve this:

- Time will be given to enable this commitment to be met.

- All staff, directors, and volunteers (where appropriate) who are new to the college will be given appropriate safeguarding training as part of their induction programme to the college.
- Updates will feature regularly in all staff and SLT meetings, as appropriate.
- All college staff and Directors will undertake the training.
- Newly recruited staff will complete training as part of their induction and will receive college-specific training, including being made aware of local risk factors for extremism.
- The DSL will attend Local Authority and other training courses as necessary and other appropriate inter-agency training every year.
- The DSL will attend Prevent training and this will be cascaded to all staff.
- Contractors will receive safeguarding training where required or when otherwise considered necessary.

10. Prevent Duty- Safeguarding Learners Who Are Vulnerable to Extremism

The College's Prevent Strategy

Liberty follows the statutory guidance on the college's responsibility to fulfil our Prevent Duty. We are aware that there have been occasions, both locally and nationally, in which extremist groups have attempted to radicalise vulnerable children to hold extreme views including those justifying political, religious, sexist, or racist violence, or to steer them into a rigid and narrow ideology that is intolerant of diversity and leaves them vulnerable to future radicalisation.

The Prevent strategy aims to stop people from becoming terrorists or supporting terrorism.

It is rare for children to become involved in terrorist activity. However, some learners from an early age can be exposed to terrorist and extremist influences or prejudiced views. Consequently, the college takes the view that early intervention is always preferable and includes this in its procedures as it does for all safeguarding concerns.

In line with both the fundamental British Values and the College Values, the following key principles underpin the community in which the college is based:

- Inclusion.
- Tolerance.
- Freedom of speech.
- The expression of beliefs and ideology.

Both learners and staff have the right to speak freely and voice their opinions. However, freedom comes with responsibility. Free speech that is designed to manipulate the vulnerable or that leads to violence and harm of others goes against the principles in which freedom of speech is valued.

Free speech is subject to treating others with respect, understanding differences, equality, an awareness of human rights, community safety, and community cohesion. The Prevent statutory guidance requires college to have clear protocols for ensuring that any visiting speakers are suitable, appropriately supervised, and undergo the same checks as other visitors.

The college is committed to training all staff in connection with the issues arising from our Prevent Duty. We are also committed to working with the Local Authority and other local partners to assess the potential risk of individuals being drawn into terrorism, because families and communities play a key role in ensuring young people and our communities are safe from the threat of terrorism.

The DSL will keep up-to-date with local threats, policies, and procedures relating to Prevent.

The Prevent Duty Risk Assessment can be found in Appendix 7.

Reducing risks of extremism

The Designated Safeguarding Lead will work with partners and the Local Authority's risk assessment to determine the potential risk of individuals being drawn into terrorism.

Actions will include:

- Promoting spiritual, moral, social, and cultural development for learners - this includes ensuring that the curriculum promotes fundamental British values.
- Creating an atmosphere of openness and safety so that learners feel free and able to discuss sensitive topics, including terrorism and extremism.
- Ensuring learners are protected from accessing extremist content online whilst in college – appropriate filters are be used.

The college recognises that the Prevent duty does not ask teachers to carry out unnecessary intrusions into family life, but, as with any other safeguarding risk, they must take action when they observe behaviour of concern.

Potential signs of radicalisation and extremism

There is no single way of identifying an individual who is likely to be susceptible to a terrorist/radical ideology. As with managing other safeguarding risks, all college staff will be vigilant to changes in learners' behaviour which could indicate that they may be in need of help or protection.

It is commonly recognised that children at risk of radicalisation may display changes in behaviour, show different signs, or seek to hide their views. Staff are advised to use their professional judgement in identifying learners who might be at risk of radicalisation and always act proportionately and seek support if they are concerned.

There is no limit to the signs that you might notice – every learner is different. However, some of the indicators staff should look out for include:

- Becoming increasingly argumentative.
- Refusing to listen to different points of view.
- Being unwilling to engage with children who are different.
- Becoming abusive to children who are different.
- Embracing conspiracy theories.
- Feeling persecuted.
- Changing friends and appearance.
- Distancing themselves from old friends.
- No longer doing things they used to enjoy.
- Converting to a new religion.
- Being secretive and reluctant to discuss their whereabouts.
- Being sympathetic to extremist ideologies and groups.
- Online, changing their identity, having more than one online identity, spending a lot of time online or on the phone, accessing extremist online content, and joining or trying to join an extremist organisation.

Numerous factors can contribute to and influence the range of behaviours that are defined as violent extremism, but most children or young people do not become involved in extremist action. For this reason, the appropriate interventions in any particular case may not have any specific connection to the threat of radicalisation. For example, they may address mental health, relationships, or drug/alcohol issues.

11. Abuse and Neglect

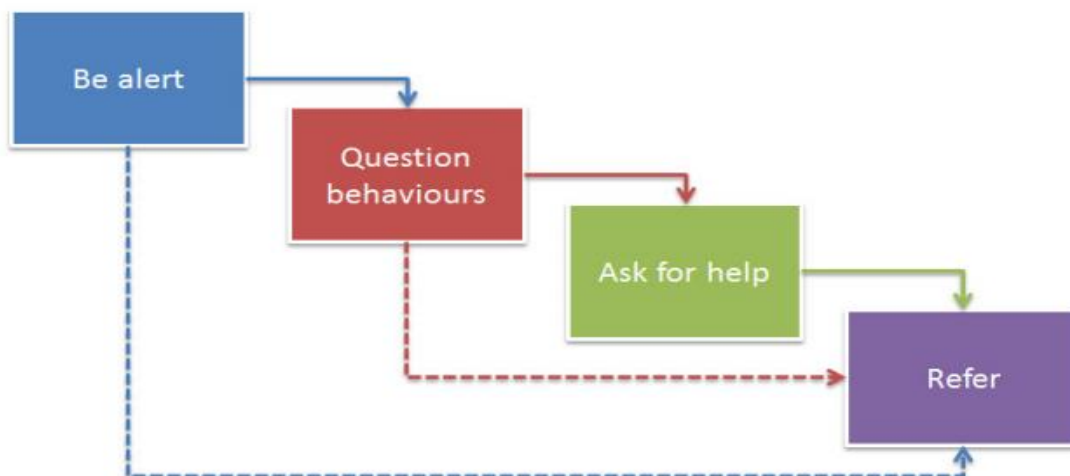
Abuse is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults, or by another child or children. In many cases, multiple issues of abuse will overlap.

All staff are made aware of the definitions and indicators of abuse and neglect as identified by Working Together to Safeguard Children (2018) and Keeping Children Safe in Education 2021. This is outlined locally within the [Kent Support Levels Guidance](#).

- **Physical abuse:** abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.
- **Emotional abuse:** the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only 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 also feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child from participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may also involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.
- **Sexual abuse:** forcing or enticing a child or young person to take part in sexual activities, not necessarily involving violence, whether or not the child is aware of what is happening. The activities may involve:
 - **Physical contact**, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing.
 - **Non-contact activities**, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse can be perpetrated by men, women, or other children. The sexual abuse of children by other children is a specific safeguarding issue (also known as peer-on-peer abuse) and set out separately in this policy.
- **Neglect:** the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy - for example, as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to:
 - Provide adequate food, clothing, and shelter (including exclusion from home or abandonment), or protect a child from physical and emotional harm or danger.
 - Ensure adequate supervision (including the use of inadequate caregivers).

- Ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

All members of staff are expected to be aware of and follow this approach if they are concerned about a child:



[‘What to do if you are worried a child is being abused’](#) 2015

12. Specific Safeguarding Concerns

All staff at Liberty are aware of safeguarding issues that can put children at increased risk of harm. Behaviours linked to issues such as drug taking, alcohol abuse, deliberately missing education, and sharing nudes or semi-nudes (also known as sexting or youth-produced sexual imagery) can put children at an increased risk of danger.

Warning signs of exploitation

One of the main signs of abuse or exploitation is when a child goes missing from education, particularly repeatedly. This can be a vital warning sign of a range of safeguarding concerns, but in particular, exploitation - including criminal exploitation and county lines and/or sexual exploitation.

Going missing from education can also indicate mental health problems, risk of substance misuse, risk of travelling to conflict zones, risk of female genital mutilation, or risk of forced marriage. Early intervention is necessary to identify the existence of any underlying safeguarding risks and to prevent the risks of a child going missing in future. All staff should be aware of Liberty's Unauthorised Absence and Children Missing from Education procedures, which are set out in this section.

Child exploitation

All staff should be aware that child criminal exploitation (CCE) – including county lines and child sexual exploitation (CSE) can involve both boys and girls - though boys and girls can be exploited using different methods and may present differently. As with other types of abuse, there is an increasing risk of exploitation taking place or beginning through threats posed online.

Staff should also be aware:

- That children who have been exploited in this way are victims themselves – and that this is sometimes not recognised by professionals.
- That CCE can lead to CSE for both boys and girls
- Children can be moved from place to place in order to exploit them (trafficked).
- Children who have been involved in this type of abuse may need extra support to stay in education.

Child criminal exploitation

Child criminal exploitation (CCE) is a form of abuse where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate, or deceive a child into criminal activity, in exchange for something the victim needs or wants, and/or for the financial or other advantage of the perpetrator or facilitator, and/or through violence or the threat of violence.

The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. Children can be moved from area to area – this is known as trafficking. Involvement in this type of abuse can be as a direct result of threats of serious violence to the young person or their family.

The victim can be exploited even when the activity appears to be consensual. Further, it does not always involve physical contact but can happen exclusively online.

Examples of CCE include: young people may be forced to work in cannabis factories, coerced into moving drugs, money, or weapons including across the country (county lines), forced to shoplift, pickpocket, or steal vehicles, or forced into violent crime or making threats to other young people.

Indicators of CCE can include a child:

- Appearing with unexplained gifts or new possessions.
- Associating with other young people involved in exploitation.
- Suffering from changes in emotional wellbeing.
- Misusing drugs and alcohol.
- Regularly missing college or education.
- Not taking part in education.
- Being involved in serious violence, carrying weapons, or vehicle crime.

Indicators for children who might be being exploited through county lines activity specifically are those who:

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

Serious violent crime

Some learners may be drawn into serious violent crime. Staff need to be aware of the indicators that this may be happening to a learner. These may include:

- Increased absence from college.
- A change in friendships or relationships with older individuals or groups.
- A significant decline in performance.
- Signs of self-harm or a significant change in wellbeing.
- Signs of assault or unexplained injuries.

Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs, and may be at risk of criminal exploitation.

There are a range of risk factors which increase the likelihood of involvement in serious violence, such as:

- Being male.
- Having been frequently absent or permanently excluded from college.
- Having experienced child maltreatment.
- Having been involved in offending, such as theft or robbery.

Staff who are concerned about any of these issues should, as with any other concern, speak to the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the Local Authority's children's social care team and the police, if appropriate. It may be that, if the concern is raised at an early stage, the learner can be supported through the Early Help process. Further information and guidance has been produced by the government and can be found [here](#).

Child sexual exploitation (CSE)

Child sexual exploitation is a form of child sexual abuse. It occurs when an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity:

- in exchange for something the victim needs or wants, and/or
- for the financial advantage or increased status of the perpetrator or facilitator, and/or
- by threats of serious violence to the victims and their family.

It can be a one-off or part of a series of acts over time and can be opportunistic or organised abuse. It can be perpetrated by men or women, and peers can be involved. Victims of this type of abuse can be male or female. The victim may be subject to criminal exploitation and may be trafficked for the purpose of exploitation.

The victim may have been sexually exploited even if the activity appears consensual. Children or young people who are being sexually exploited may not understand that they are being abused. They often trust their abuser and may be tricked into believing they are in a loving, consensual relationship. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology. For example, young people may be persuaded or forced to share sexually explicit images of themselves, have sexual conversations by text, or take part in sexual activities using a webcam. CSE may also occur without the victim's immediate knowledge - for example, through others making copies of recordings or images.

The following list of indicators is not exhaustive or definitive, but it does highlight common signs which can assist professionals in identifying children or young people who may be victims of sexual exploitation.

Signs include:

- Underage sexual activity.
- Inappropriate or risky sexual or sexualised behaviour.
- Repeated sexually transmitted infections.
- In girls, repeated pregnancy, abortions, and miscarriage.
- Receiving unexplained or unaffordable gifts or gifts from unknown sources.
- Going to hotels or other unusual locations to meet friends.
- Moving around the country, appearing in new towns or cities, not knowing where they are.
- Getting in/out of different cars driven by unknown adults.
- Having older boyfriends or girlfriends or hanging out with groups of older people.
- Being involved in abusive relationships, intimidated, and fearful of certain people or situations.

- Associating with other young people involved in sexual exploitation.
- Recruiting other young people to exploitative situations.
- Truancy, exclusion, disengagement with college, opting out of education altogether.
- Unexplained changes in appearance, behaviour, or personality (chaotic, aggressive, sexual, etc.).
- Self-harming, suicidal thoughts, suicide attempts, overdosing, eating disorders.
- Drug or alcohol misuse.
- Getting involved in crime.
- Police involvement, police records.
- Being involved in gangs, gang fights, gang membership.
- Injuries from physical assault, physical restraint, sexual assault.

Honour-based abuse: Forced Marriage (FM)

This is an entirely separate issue from an arranged marriage. Forced Marriage is a human rights abuse and falls within the Crown Prosecution Service definition of domestic abuse. It is also a criminal offence to force a person to marry in England and Wales.

Young men and women can be at risk in affected ethnic groups. Evidence shows that the issue of forced marriage affects certain sectors of communities, typically girls in the age range of 14 – 16 years old originating from Pakistan, India, and Bangladesh (approx. 60% of the cases) together with a percentage of cases of children originating from the Middle-East and African countries. However, it can affect boys and children with SEND.

A signal of FM is the removal of the child from college and lengthy absence which is often unexplained. Other indicators may be detected by changes in adolescent behaviours. Whistleblowing may come from younger siblings. Any member of staff at Liberty with any concerns should report this immediately to the DSL, who should raise the concern with the Local Police Safeguarding Unit by email or phone. Never attempt to intervene directly as a college or through a third party. Whilst the onus of the investigation for criminal offences will remain with the Police, the DSL should co-operate and liaise with the relevant agencies in line with current child protection responsibilities.

Honour-based abuse: Female Genital Mutilation (FGM)

There is a specific legal duty on teachers regarding FGM. If, during the course of their work, a member of staff discovers that an act of FGM appears to have been carried out on a girl under the age of 18 years, then they must report it to the police. All staff at Liberty will recognise this responsibility.

The 'One Chance' rule.

As with Forced Marriage, there is the 'One Chance' rule regarding FGM. This refers to staff potentially only having one chance to speak to a potential victim and thus may only have one chance to save a life. It is essential that the college takes action without delay.

What is FGM?

Female genital mutilation involves procedures that intentionally alter/injure the female genital organs for non-medical reasons.

Why is it carried out?

It is often based on a belief that FGM:

- Brings status/respect to the girl – social acceptance for marriage.
- Is part of being a woman/rite of passage.
- Upholds family honour.
- Fulfills a religious requirement.
- Helps girls be clean/hygienic.
- Is cosmetically desirable.
- Makes childbirth easier – this is a mistaken belief.

FGM is a criminal offence.

All staff at Liberty will be made aware of FGM practices and the need to look for signs, symptoms, and other indicators of FGM.

All teachers have a mandatory responsibility to report FGM if they discover, in the course of their professional duties what appears to be FGM to the police. The DSL, who will offer support, should also be informed immediately. Circumstances and occurrences that may point to FGM happening include:

- The child talking about getting ready for a special ceremony.
- The child and their family taking a long trip abroad.
- The child's family being from one of the 'at risk' communities for FGM (Kenya, Somalia, Sudan, Sierra Leon, Egypt, Nigeria, Eritrea as well as non-African communities including Yemen, Afghani, Kurdistan, Indonesia, and Pakistan).
- Knowledge that the child's sibling has undergone FGM.
- The child talking about going abroad to be 'cut' or to prepare for marriage.

Signs that may indicate a child has undergone FGM:

- Prolonged absence from college and other activities.
- Behaviour changes on return from a holiday abroad, such as being withdrawn and appearing subdued.
- Bladder or menstrual problems.
- Finding it difficult to sit still and looking uncomfortable.
- Complaining about pain between the legs.
- Mentioning something somebody did to them that they are not allowed to talk about.
- Secretive behaviour, including isolating themselves from the group.
- Reluctance to take part in physical activity.
- Repeated urinal tract infections.
- Disclosure of abuse.

Further guidance and information are available from: **NSPCC FGM Helpline**
Contact days and times: **24 hours** Tel: **0800 028 3550** Email: **fgmhelp@nspcc.org.uk**

Peer-on-peer abuse

All staff at Liberty must be aware that children can abuse other children (referred to as peer-on-peer abuse). This is most likely to include, but may not be limited to:

- Bullying, including cyberbullying, prejudiced-based, and discriminatory bullying.
- Physical abuse, such as hitting, biting, kicking, shaking, hair-pulling, or causing physical harm.
- Sexual violence, such as rape, assault by penetration, and sexual assault.
- Sexual harassment and online sexual harassment, such as that which takes place on social media or chat rooms, which may be stand-alone or part of a broader pattern of abuse.
- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.
- Consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth-produced sexual imagery).
- Upskirting, which is a form of abuse that has been high on college and court agendas for a number of years and is a criminal offence in its own right under the Voyeurism (Offences) Act 2019. Upskirting occurs when someone takes a picture under a person's clothing, with or without underwear, without permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification or

cause the victim humiliation, distress, or alarm. It is a common aspect of peer-on-peer abuse and can happen to any gender.

- Initiation/hazing type violence and rituals. This could include activities involving harassment, abuse, or humiliation, used as a way of initiating a person into a group. It may also include an online element.

Identifying peer-on-peer abuse & understanding consent

Every learner will react differently, but some recognised indicators of peer-on-peer abuse are:

- Bleeding, bruising, sexually transmitted infections (STIs), or pregnancy.
- Becoming withdrawn or displaying other behaviour changes.
- Being fearful of being in college or online.
- Missing education.
- Self-harming.
- Displaying behaviours beyond their stage of development.

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.

Most issues of peer-on-peer abuse can be dealt with through the college's behaviour policy, but where the behaviour raises a safeguarding concern, it falls within the scope of this child protection and safeguarding children policy. Procedures for dealing with these sorts of concerns, including violent sexual assault by peers, is set out in Section 11 of this policy.

The college recognises that it is important to educate learners to understand:

- What constitutes appropriate behaviour – including online.
- Issues around consent.
- Issues around discrimination and misogamy.
- Where the criminal law fits into this type of behaviour.

The college recognises that peer-on-peer abuse is a problem and is happening, even when the issues are not reported. This sort of abuse has a serious impact on those who are victims, in terms of self-esteem and relationships but also educational outcomes.

Consequently, Liberty has put in place procedures and expectations based on the following:

- This type of abuse takes place in college, outside of college, and online. It can affect any age of child but is predominantly an issue for secondary and college age groups.
- Staff must maintain an attitude of "it could happen here".
- Downplaying inappropriate behaviour can lead to a culture of unacceptable behaviour and can lead ultimately to normalisation of abuse. It will not be tolerated – we have a zero-tolerance approach to this issue.
- Staff must intervene in "inappropriate" behaviour, which can prevent it from escalating to abusive or violent behaviour.
- It is crucial to have a zero-tolerance approach to sexual violence and sexual harassment, and an important part in this is not tolerating or laughing off sexual banter or jokes.

- Victims of this type of abuse are likely to be distressed and there is a likelihood of it affecting their educational attainment – this is more likely where the alleged perpetrators attend the same college or college.
- Girls are more likely to be victims and boys are more likely perpetrators – however, any report or suspicion should be taken seriously.
- The abuse can be perpetrated by an individual or a group.
- Sexual violence can happen in intimate relationships between peers.
- There can be links between this type of abuse and sexual and criminal exploitation.
- Some children may face additional barriers in reporting because of vulnerabilities, disabilities, sex, ethnicity, and sexual orientation.
- Procedures that we put in place to deal with issues of sexual violence or harassment must be clear, easily accessible, and well-promoted, so that children feel confident in reporting abuse.
- Staff must be aware of behaviour in children that might indicate there is an issue with sexual harassment or violence and act immediately.
- Responding to each incident well will build a trust in the systems so that victims will feel able to come forward in future.
- It is extremely important to listen and react to the child's report (listening well and not asking leading questions).
- Whilst victims' wishes and feelings are of paramount importance, a college should not forget to balance this with its duty to protect other children.
- Where a report is found to be malicious or unfounded, the college should consider what the most appropriate step should be – it might be that the person has been abused by someone else or the allegation might be a cry for help. If the report was deliberately made up, the college will consider using disciplinary processes.
- All staff should understand the consequences of sexual violence and be aware of all of the available resources for victims but also for perpetrators – many of which are linked at the end of the section.
- It is important to look for patterns in all reports and identify any broader issues that need to be addressed.

All staff have been asked to read the guidance on sexual violence and sexual harassment between children [here](#), which contains detailed information on a range of relevant topics (e.g. definitions, contextual issues such as power and coercion, and advice on a whole-college approach).

Sharing nude/semi-nude images (sexting)

Your responsibilities when responding to an incident

If you are made aware of an incident involving the sharing of nude or semi-nude images (also known as sexting and 'youth-produced sexual imagery'), you must report it to the DSL immediately.

You must not:

- View, download, or share the imagery yourself, or ask a learner to share or download it. If you have already viewed the imagery by accident, you must report this to the DSL.
- Delete the imagery or ask the learner to delete it.
- Ask the learner(s) who are involved in the incident to disclose information regarding the imagery (this is the DSL's responsibility).
- Share information about the incident with other members of staff, the learner(s) it involves, or their, or other, parents and/or carers.
- Say or do anything to blame or shame any learner involved.

You should explain that you need to report the incident, and reassure the learner(s) that they will receive support and help from the DSL. Further information can be found here: <https://www.gov.uk/government/publications/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people>

Learners should be made aware of this information so that they are aware of the processes the college will follow in the event of an incident.

13. Children Missing Education

All learners, regardless of their circumstances or background, are entitled to education that is suitable to their age, ability, aptitude, and any special educational needs and disabilities.

The college operates a strong attendance tracking system that is overseen by a member of the leadership team. The tracking and use of effective attendance management strategies enables the college to ensure each day that every learner is accounted for.

The college takes a range of actions to tackle Persistent Absentees and completes official reports on children who are persistently absent from college.

The college will only authorise leave of absence in exceptional circumstances. A Director will determine the length of time that the child can be away from the college.

The college recognises that some children seeking leave of absence are vulnerable to risk of abuse, neglect, exploitation or travelling to conflict zones, or at risk of FGM or Forced Marriage.

Attendance staff are trained to look out for these triggers and the college works in partnership with the Local Authority to ensure localised risks are particularly taken note of and shared with all staff. Staff who have pastoral responsibility undergo training on attendance and safeguarding issues on an annual basis.

Where this is identified, staff should alert the DSL and a Director. The DSL will, as soon as a concern is established, alert the Local Authority.

As a matter of course: learner absence must be followed up on a daily basis – this must be a priority. The college holds more than one contact number for each child. Unless circumstances indicate that a learner is at risk and immediate action is necessary, the Local Authority will be informed of every child who has a continuous period of unexplained absence of three days or more.

The admissions register at the college is kept up to date and the Local Authority is informed of all learners who are removed from the college roll when they:

- Have been taken out of college by their parents and are being educated outside the college system, e.g. via home education.
- Have ceased to attend college and no longer live within reasonable distance of the college at which they are registered.
- Have been certified as unlikely to be in a fit state of health to attend college before ceasing to be of compulsory school age, and neither he/she/zie nor his/her/zir parent has indicated the intention to continue to attend the college after ceasing to be of compulsory school age.
- Are in custody for a period of more than four months due to a final court order and the proprietor does not reasonably believe they will be returning to the college at the end of that period.
- Have been permanently excluded.

The Local Authority will be informed as soon as the grounds for deletion are met, in line with the local authority guidelines, but no later than at the point of deleting the learner's name from the roll.

No learner will be removed from a college roll until all safeguarding checks have been completed or the whereabouts of a learner have been established.

Elective Home Education

Where the college is informed by parents of a decision to home educate their child, the college will inform the Local Authority and contribute to any meetings.

14. Domestic Abuse

Domestic abuse (often referred to as domestic violence) refers to any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence, or abuse between those aged 16 or over who are, or have been, intimate partners or family members, regardless of gender or sexuality. It can occur in intimate relationships between older children.

Exposure to domestic abuse can have a serious, long lasting emotional and psychological impact on children.

Operation Encompass

Liberty is an [Operation Encompass College](#). This means we work in partnership with Kent Police to provide support to children experiencing domestic abuse. This initiative helps police and colleges work together to provide emotional and practical help to children who have been involved in domestic abuse. When the police are called to an incident of domestic abuse, where there are children in the household who have experienced the domestic incident, the police will inform the key adult (usually the DSL) before the child or children arrive at college the following day. This ensures that the college has up to date and relevant information about the child's circumstances and can enable support to be given to the child according to their needs. DSLs should endeavour to alert relevant pastoral support staff as soon as possible where this is appropriate.

15. Online Safety

Liberty's online safety policy and other connected policies and agreements can be found on the college website or upon request. These are updated annually and as required. All staff must understand that threats to children from online activity are increasingly a factor in many types of abuse. All staff should be aware that these risks also evolve and change.

All staff are trained in online safety in conjunction with their safeguarding training. As these threats are dynamic and evolve, the college keeps staff awareness up-to-date through regular bulletins and training.

The college's approach to online safety is based on the four key categories of risk as identified by KCSIE 2021:

- **Content** – being exposed to illegal, inappropriate, or harmful content, such as pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation, and extremism.
- **Contact** – being subjected to harmful online interaction with other users, such as peer-to-peer pressure, commercial advertising, and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial, or other purposes.
- **Conduct** – personal online behaviour that increases the likelihood of, or causes, harm, such as making, sending, and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography), sharing other explicit images, and online bullying.
- **Commerce** – risks such as online gambling, inappropriate advertising, phishing, and/or financial scams.

Being safe in the online environment is essential for learners – it empowers them to keep themselves safe. Online safety is embedded through our curriculum provision and ensures children are taught about safeguarding, including online safety, through a variety of teaching and learning opportunities.

We teach learners a range of topics, including:

- How to recognise threats online.
- How to recognise inappropriate content and how to behave online – for example, we will cover misogynistic content; self-harm, sexual discrimination, cyberbullying, peer-on-peer abuse, the dark web, fake news, false advertising, and phishing.
- How to keep personal data safe.
- How to report issues of concern both for themselves and others.

Liberty also has a robust set of procedures in place to address the issues posed by online threats, including:

- Online Safety Policy and related policies (Acceptable Internet Use Agreement & Policy, Anti-Cyber Bullying Policy) which must be read alongside this document and in conjunction with the DfE guidance 'Teaching online safety in school, 2019'.
- Robust and regular information for everyone in college about how to maintain a safe online presence (including learners, staff, and volunteers).
- Engagement with parents and others using events such as parent's days and newsletters, as well as social media channels.
- Ensuring robust filters and monitoring are in place.

Together with our IT providers, the college ensures it provides an appropriate level of security to protect all our users and their data.

We follow KELS I and The Education People guidance and expectations which can be found here - [Online Safety | The Education People](#)

16. Cybercrime

Liberty recognises that there is a risk to learners from being drawn into this type of criminal activity that can only be committed online (i.e. cyber-enabled activity). There are three main types of activity:

- Unauthorised access (hacking) - for example, where learners access areas of an IT system to change their grades.
- Denial of service (booting) - where a network is overrun, or an attempt is made to achieve this.
- Malicious software (malware) - activity which introduces viruses into IT systems (or attempts to).

Staff who have concerns about this should report it to the DSL, who can refer the individual to the Cyber Choices programme. This programme aims to intervene when young people are at risk in this way.

17. Opportunities to Teach Safeguarding

Liberty will ensure that children are taught about safeguarding, including online safety. This may include covering relevant topics through learning in general but is covered particularly through timetabled lessons and tutorials. We recognise that a 'one size fits all' approach may not be appropriate for all children, and a more personalised or contextualised approach for more vulnerable children, victims of abuse, and some SEND children might be needed.

The college understands that our responsibility extends to helping learners keep themselves safe outside of college, and this includes both online and outside of the college gates, where dangers such as child abduction and grooming exist.

18. Looked After Children

All staff at Liberty will have an awareness of issues around safeguarding looked after children. The leadership team will ensure that staff have the skills, knowledge, and understanding necessary to keep looked after children safe. Staff are aware that looked after children (and those previously looked after) may have extra needs and may need extra support to achieve desired education outcomes.

Staff will be aware of the legal status of a looked after child's care arrangements. In particular, they will ensure that appropriate staff have the information they need in relation to a learner's looked after legal status (whether they are looked after under voluntary arrangements with consent of parents or on an interim or full care order) and contact arrangements with birth parents or those with parental responsibility. They should also have information about the learner's care arrangements and the levels of authority delegated to the carer by the authority looking after him/her/him. The Designated Safeguarding Lead will have details of the learner's social worker and the name of the virtual college head in the authority that looks after the learner.

The Directors will appoint a Designated Person from the Senior Leadership Team to promote the educational achievement of learners who are looked after and to ensure that this person has appropriate training. The role of the Designated Person is to work closely with the DSL to ensure that any safeguarding concerns regarding looked after and previously looked after children are quickly and effectively responded to.

19. Liaison with the Virtual Head

The college's Designated Person for looked after children will work with the virtual head to monitor the child's welfare, promote their educational achievement, and discuss how funding can be best used to support the progress of the child and meet the needs identified in the learner's personal education plan.

20. Learners with A Social Worker

We recognise that children with social workers can need extra support. A child's experiences of adversity and trauma last for many years and can leave them vulnerable to further harm as well as potentially creating barriers to attendance, learning, behaviour, and mental health.

The DSL and all members of staff will work with and support social workers to help protect vulnerable young people and will help with any reasonable adjustments individuals in this cohort may need.

Where we are aware that a learner has a social worker, the DSL will always consider this fact to ensure any decisions are made in the best interests of the learner's safety, welfare, and educational outcomes. For example, it will inform decisions about:

- Responding to unauthorised absence or missing education where there are known safeguarding risks.
- The provision of pastoral and/or academic support.

21. Learners with Special Educational Needs, Disabilities or Health Issues

Children with special educational needs or disabilities (SEND) or certain health conditions can face additional safeguarding challenges.

Additional barriers can exist when recognising abuse and neglect in this group of children. These can include:

- Assumptions that indicators of possible abuse such as behaviour, mood, and injury relate to the child's condition without further exploration.
- The fact that these children being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children.

- The fact that these children are at increased risk of abuse and exploitation whether from peers, those who seek to harm children, or criminal gangs.
- The potential for children with SEND or certain medical conditions to be disproportionately impacted by behaviours such as bullying, without outwardly showing any signs.
- Communication barriers and difficulties in managing or reporting these challenges.

The college therefore looks to address this issue through raising awareness amongst staff, offering tailored pastoral support, and ensuring communication with children in these groups is effective. It may also involve referral to CAMHS or supporting any such referral.

Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare and can pose serious safeguarding and child protection risks.

There is also now a Homelessness Duty imposed through the Homelessness Reduction Act 2017, which places a duty on local authorities to intervene at earlier stages to prevent homelessness in their areas. This extends to all social services functions, including Early Help, and is intended to increase early identification and intervention.

Earlier intervention can help prevent children and young people becoming homeless. Where a child is – or is at risk of – becoming homeless and has also been harmed or is at risk of harm, the DSL will also make a referral to children's social care.

22. Confidentiality and Record Keeping

Staff at Liberty have a professional responsibility to share relevant information about the protection of children with the DSL and potentially external investigating agencies, where possible, under the guidance of the DSL.

If a learner confides in a member of staff and requests that the information is kept secret, it is important that the member of staff tells the learner sensitively that he/she/zie has a responsibility to refer the matter to the DSL.

Accurate, signed, and dated written notes must be kept of all safeguarding and related incidents and child protection concerns relating to individual learners. If a teacher or any other staff have a child protection concern, they should inform the DSL or Deputy DSL as soon as possible. These will be stored on CPOMS. All paper records are stored in a locked cabinet with restricted access.

Arrangement for child protection documentations must comply with the colleges Data Protection Policy together with data protection law and regulation applicable at the time. The DSL will ensure that all child protection records are held separately from other learner records. Child protection files and documents will be stored securely, by encryption and/or password protecting electronic files through the use of CPOMS. All staff are trained to use the systems, which are access controlled. All paper records are stored in a locked cabinet with restricted access.

Information from child protection files will only be shared with relevant staff when it is necessary to do so (following the government's seven golden rules for data sharing) and in a manner that is consistent with data protection law.

If the college receives a request for direct access to, or copies of, college documentation held on a child protection file, a Director and DSL will be informed, and a decision taken on the appropriate way forward in accordance with the Data Protection Policy. It may be that the college's Data Protection Officer will be consulted, or further legal advice sought.

In the event of a learner who is being dealt with under the college's child protection procedures transferring to another setting, the college will:

- Find out the name of the receiving setting (and, where appropriate, the Local Authority).
- Contact the relevant member of staff at that setting to discuss the transfer.
- Within 5 days of transfer - or 5 days after the start of term if the transfer is out of term time – securely send all information relating to the learner to the receiving college (and, where relevant, the Local Authority).
- Check with the receiving setting that the learner has actually arrived there on the expected day (and inform all relevant agencies of the transfer).
- Consider whether or not it is appropriate to inform a new college that a child is involved in a Channel programme.
- Ensure that, where a perpetrator transfers colleges, the new setting is made aware of potential risks, protective factors, and any ongoing support the child is receiving.

Any external individual or organisation contracted by the college to work with college learners (for example, a child psychologist) must report any child protection incidents or disclosures from learners to the Director or DSL at the earliest opportunity. Such individuals, organisations or bodies will, as part of their contractual arrangements with the college, be required to work in accordance with the college's child protection and safeguarding policy. The college has in place data sharing agreements and complies with all relevant data sharing protocols.

Safeguarding records which contain information about allegations of sexual abuse will be retained for the Independent Inquiry into Child Sexual Abuse (IICSA), for the term of the inquiry.

Where the college contracts with others to run activities in the college premises or grounds, appropriate safeguarding arrangements/expectations will form part of the contract.

23. Working with Parents/Individuals with Parental Responsibility

Liberty recognises the importance of working, where appropriate, in partnership with parents and carers to ensure the welfare and safety of our learners.

The college will therefore:

- Make parents aware of the college's statutory role in safeguarding and promoting the welfare of learners, including the duty to refer learners on, where necessary, by making all policies available on the website and on request.
- Work with parents to support the needs of their child including raising awareness of threats posed online.
- Only notify the parents or carers where there is no increased the risk to the child or others by doing so. Wherever necessary, we will discuss this with the Local Authority children's social care team before doing so.
- In the case of allegations of abuse made against other children, we will normally notify the parents or carers of all the children involved if the proviso above is satisfied.
- Ensure a robust complaints system is in place to deal with issues raised by parents and carers.
- Provide advice and signpost parents and carers to other services where learners need extra support.

24. Health and Safety

The Directors of Liberty will ensure that there is a robust, up-to-date Health and Safety Policy and Procedure to meet the statutory responsibility for the safety of learners and staff at the college. The Directors will identify and manage health and safety through the use of risk assessments, which are carried out:

- On an annual basis for the college learning spaces and environment in and outdoors.
- For all college trips and educational visits.

- For learners travelling between locations during the college day.
- For all work-based learning on work experience placements.
- When a learner returns following an exclusion due to risky or violent behaviour.
- When there are any changes to the premises or practices.
- Following a serious accident in relation to staff and/or learners.
- When there is a high-level risk associated with contact with parents.
- To maintain effective security of the premises including protection from intruders, trespassers, and/or criminal damage.

The college takes a risk-based approach to visitors and contractors on site. The normal procedure for visitors and contractors not working directly with children is that they will:

- Report to the college reception on arrival.
- Provide proof of identity.
- Wear a name badge at all times.
- Receive suitable supervision by college staff when on site.
- Be made aware of the arrangements for safeguarding and health and safety.
- Comply with the relevant vetting checks specified through the college's recruitment process.

25. Equal Opportunities

Liberty must take into account the Equality and Diversity Policy when discharging their duties under this policy.

26. Ofsted Inspections

From September 2019, Ofsted's inspections of colleges will be carried out under Ofsted's Education Framework. Inspectors will always report on whether or not arrangements for safeguarding children and learners are effective. In addition, Ofsted publishes specific guidance to inspectors.

You can find guidance documents at the following link:

<https://www.gov.uk/government/publications/inspecting-safeguarding-in-early-years-education-and-skills>

27. Monitoring and Review of This Policy

The Designated Safeguarding Lead (DSL) at Liberty will monitor the working of this policy and will report as required to the Directors. It will be reviewed as required and annually.

28. Appendix 1 – Staff Guidance

A. Procedures in respect of Child Abuse Early Help

If a child or family would benefit from support from multiple services, then social care may request that an **Early Help Assessment (EHA)** is carried out first. The assessment aims to identify what kind of support the child or family needs in order to resolve the problem.

Any child may benefit from early help, but all college staff should be particularly alert to the potential need for early help for a child who:

- Is disabled or has certain health conditions and has specific additional needs.

- Has special educational needs (whether or not they have a statutory Education, Health, and Care Plan).
- Has a mental health need.
- Is a young carer.
- Is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines.
- Is frequently missing/goes missing from care or from home.
- Is at risk of modern slavery, trafficking, or 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 drugs or alcohol themselves.
- Has returned home to their family from care.
- Is at risk of 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage.
- Is a privately fostered child.
- Is persistently absent from education, including persistent absences for part of the college day.

The Early Help Assessment is a multi-agency assessment, often led by a lead professional, who could be a social worker or other professional who already provides support to the child and family. This person may be the college's Designated Safeguarding Lead.

It also needs to be undertaken with agreement from both the child and their parents or carers and must involve the child, the family, and any other professionals who are working with them.

If the EHA results in the professional suspecting that the child is in need, or likely to suffer significant harm, then **a referral should be made to social care straight away.**

Once the referral has been accepted by social care, a multi-agency assessment - as detailed under section 17 of the **Children Act 1989** - is required to determine whether the child is in need, which services are appropriate, and what action to take.

Under the Children Act 1989, local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare.

The purpose of the assessment is to:

- Assess if a **child is in need**. Section 17 explains that a child is in need when: they are unlikely to achieve or maintain, or have the opportunity of achieving and maintaining, a reasonable standard of health or development without the provision of services by a local authority; their health or development is likely to be significantly impaired, or further impaired, without the provision of such services; or they are disabled.
- Gather **important information** about a child and family. Section 17 requires a local authority to, as far as possible, promote the upbringing of the child within the family and to ascertain the wishes and feelings of the child whilst balancing this with the child's welfare.
- Analyse their needs and/or the nature and level of any risk and harm being suffered by the child.
- Decide whether the child is suffering, or likely to suffer, significant harm.
- Provide support to address those needs to improve the child's outcomes and make them safe.

The assessment is **child-centred** and all decisions must be made with the child's best interests in mind. This includes focusing on outcomes that address the child's needs, both within their family and the wider community, and seeing decisions from the child's perspective. Hearing the child's voice and opinions is crucial.

The assessment is also a continuous process, not a one-off event, and is regularly reviewed to ensure the child continues to receive the services that they need.

The social worker who carries out the assessment will analyse all information that they have about the child, including the results of any EHA, and clarify the child's needs and level of risk that they may be facing. As someone who works with the child you may be required to provide further information about the child and family.

If the information gathered from the assessment results in the social worker suspecting that the child is suffering, or likely to suffer, significant harm, then a multi-agency strategy meeting/discussion must be held to decide what further action is needed. This multi-agency strategy discussion will involve representatives from social care, the police, health services, and any other relevant services or people, such as the person who made the referral.

The discussion may be in person, over a telephone conference, or both, and can take place at any time from the moment of referral right through the assessment process.

Section 47 enquiries

Section 47 enquiries are necessary when there is a need to safeguard and promote the welfare of a child because they are suspected of suffering significant harm.

Section 47 of the Children's Act imposes a duty on local authorities to investigate when there is a child in their area who is:

- Subject to an emergency protection order;
- In police protection; or,
- Where the local authority has reasonable cause to suspect that a child who lives, or is found, in their area is suffering, or is likely to suffer, significant harm.

Under the Act, "the authority shall make, or cause to be made, such enquiries as they consider necessary to enable them to decide whether they should take any action to safeguard or promote the child's welfare".

The enquiry is a dynamic process but usually involves:

- Speaking to the child who is the subject of concern to ascertain their wishes and feelings.
- Interviewing parents or carers and determining wider factors that may impact on the child and family.
- Systematically gathering information about the child's and family's history.
- Analysing the findings of the assessment.
- Undertaking appropriate medical tests, examinations, or observations to determine how the child's health or development may be being impaired.

Local authority social workers are responsible for deciding what action to take and how to proceed following section 47 enquiries. Where concerns of significant harm are substantiated and the child is believed to be suffering, or likely to suffer, significant harm, social care will:

- Convene an initial Child Protection Conference within 15 working days of the strategy discussion.
- Consider whether any professionals with specialist knowledge should be invited to participate.
- Help prepare the child and parents if needed.

Social care may ask professionals who have contact with the child to contribute further information or attend the Child Protection Conference to help with the decision making.

These meetings are chaired by Independent Reviewing Officers who are employed by the local authority but act independently. The meetings bring together professionals, gather evidence, and determine actions that are required to safeguard the child.

If it is found that the concerns of significant harm are not substantiated, then social care should:

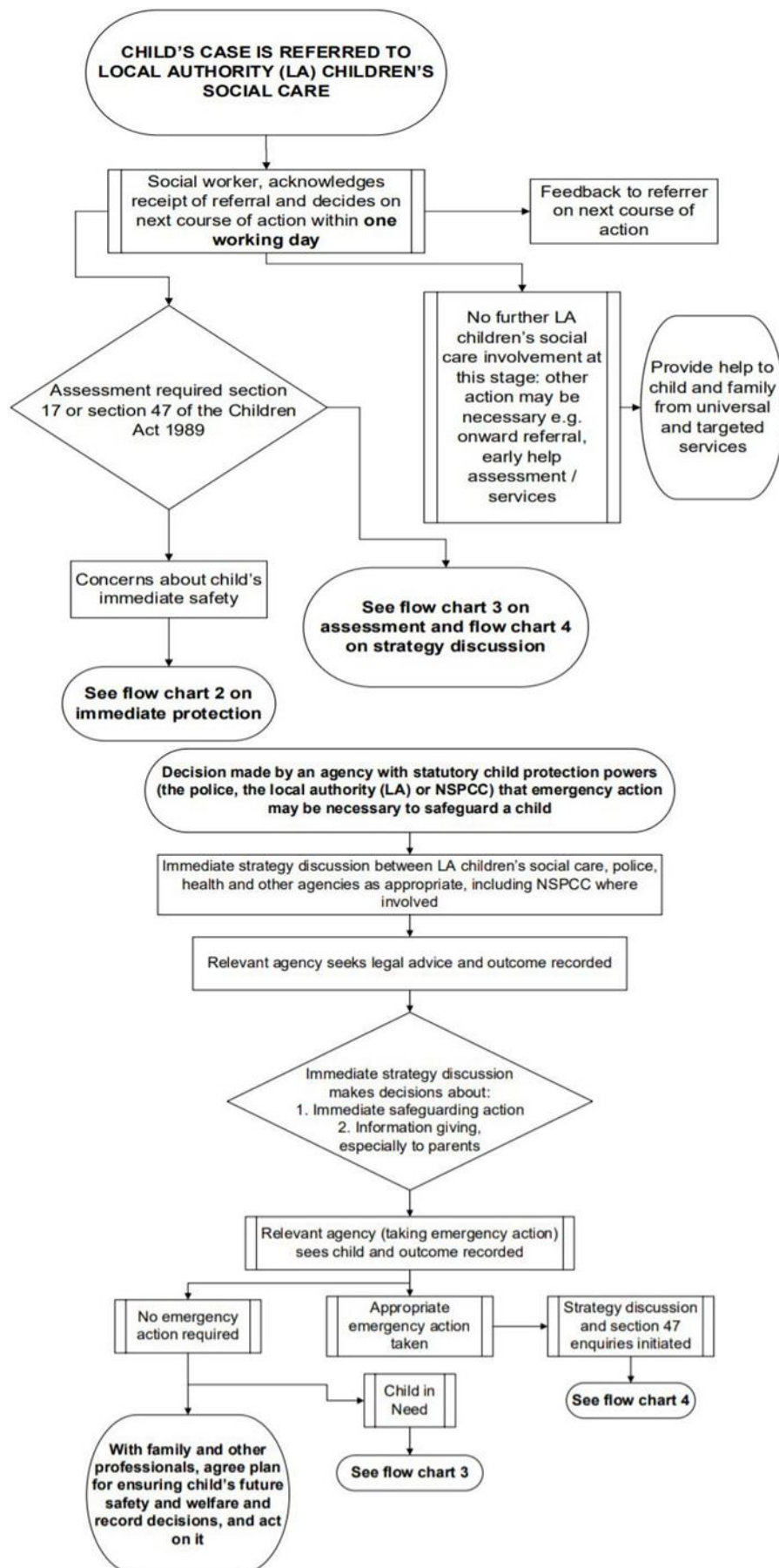
- Discuss the case with the child, their parents, or the professionals involved.
- Determine whether support from services is needed.
- Consider if the child's health and development needs to be re-assessed.

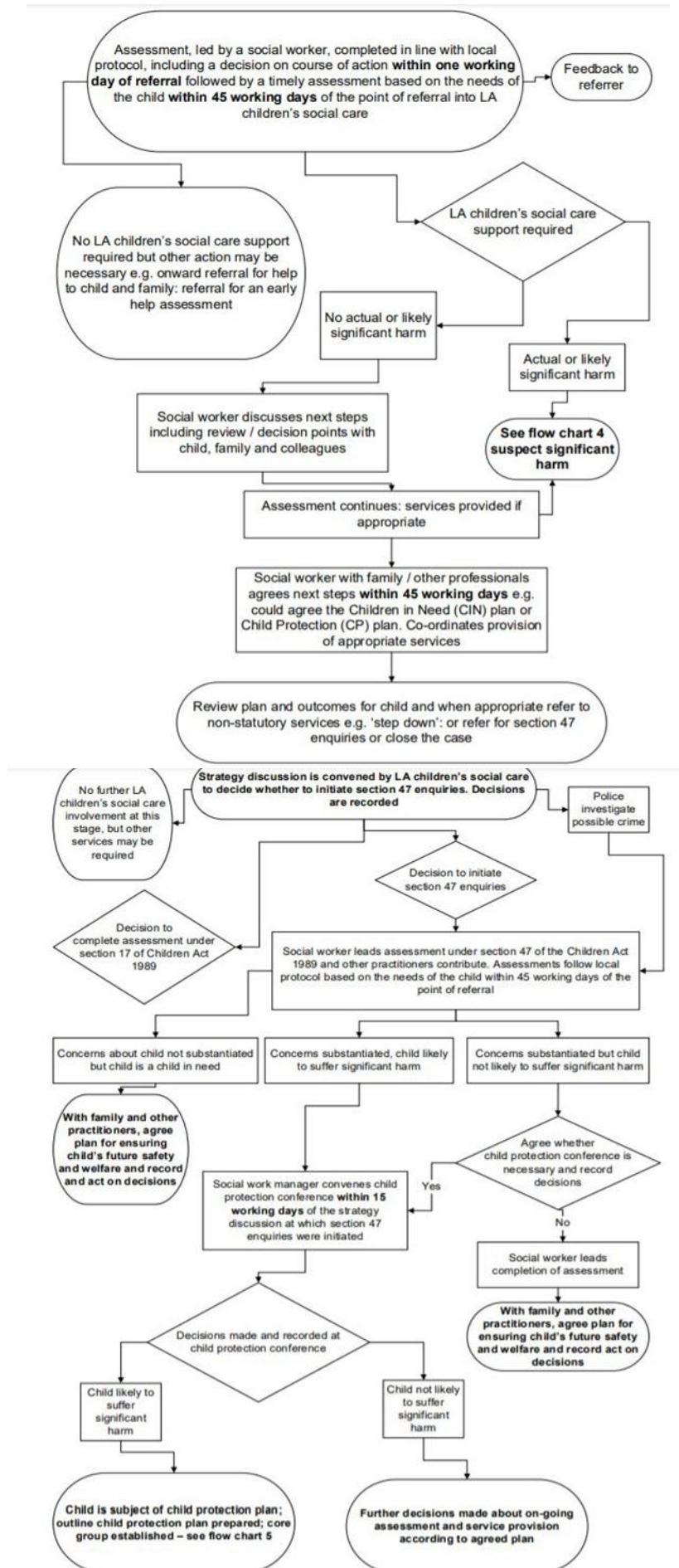
If the local authority considers the child at risk of significant harm, or beyond parental control, then they will start the process of applying to the family courts for a Care Order under section 37 of the Children's Act, or they will seek joint parental control under section 20 of the Children's Act 1989.

Local Authorities assess each case against a threshold to ascertain which level of service, if any, is most suitable. The image below represents the decision making of the continuum of need when making these assessments.



Below are some simple flowcharts from Working Together to Safeguard Children 2018, which sets out how cases flow through the various systems.





B. Guidance for all staff on dealing with disclosure

I. Dealing with disclosures of abuse

- Always listen carefully and quietly. Do not press for any evidence at all.
- Remain calm and reassuring. Do not dismiss the disclosure and do not show distress or concern.
- Do not refute the allegation.
- Show that you care through open and reassuring facial expressions and body language.
- Do not interrogate or ask leading questions (it could later undermine a case).
- Ensure you take a written verbatim account of the child's disclosure.
- Staff should be aware that written accounts could become part of a statutory assessment or criminal investigation.
- Where there is an online element, the key consideration is for staff not to view or forward illegal images of a child. Where viewing images is unavoidable, the following link provides advice on how to respond: <https://www.gov.uk/government/publications/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people>

II. At this point, staff should take the following steps:

- Explain to the learner that the disclosure must be reported – emphasise your trust in them.
- Do not promise to keep the allegation secret or that 'everything will be alright.'
- Reassure the learner by telling them that they have done the right thing in telling you. Do not offer physical reassurance.
- Never make the child feel that they are wrong for bringing issues to your attention.
- Do not admonish in any way e.g. 'I wish you had told me sooner.'
- Inform the DSL initially verbally.
- Under no circumstances discuss the matter with any other person. If the allegations prove to be untrue, any such discussion would be deemed defamatory. Information to staff is on a 'need to know' basis at the discretion of the DSL.
- If the child agrees, and it is appropriate, take them with you to the DSL.
- With the DSL, prepare a detailed report itemising:
 - The information revealed by the learner. It should not contain any opinion whatsoever.
 - Actions taken by yourself, including when the suspicions were reported, to whom the suspicions were reported, and follow-up action taken within the college.
 - Date and sign any written record of events and action taken and keep confidential and secure.
 - You must keep, in absolute confidence, a copy of the report, as will the DSL.
 - The DSL keeps Child Protection records centrally and securely and are not kept in the child's file.
 - All staff are under a duty to report all suspicions of abuse to the DSL (or as per the instructions in the main policy document where the DSL is not available).
 - The DSL is responsible for passing on these concerns to children's services.
 - Accurate records are essential in the event of further investigations
 - Any referral must include as much relevant information as possible. Systems for referral should be in line with local protocols:
- The DSL or a deputy should always be available to discuss safeguarding concerns. If in exceptional circumstances, a DSL is not available, this should not delay appropriate action being taken. Staff should speak to a member of the senior leadership team and/or take advice from Education Safeguarding Service or via consultation with a social worker from the Front Door. In these circumstances, any action taken will be shared with a DSL as soon as is practically possible.
- Liberty will respond to concerns in line with the Kent Safeguarding Children Multi-Agency Partnership procedures (KSCMP).
 - The full KSCMP procedures and additional guidance relating to reporting concerns and specific safeguarding issues can be found on their website: <http://www.kscmp.org.uk/>
 - Specific information and guidance to follow with regards to accessing Early Help and Preventative Services and/or Children's Social Work Services as part of Integrated Children's Services (ICS) in Kent can be found here:

- Where a child is suffering, or is likely to suffer from harm, or is in immediate danger, a ‘request for support’ will be made immediately to Integrated Children’s Services (via the ‘Front Door’) and/or the police, in line with KSCMP procedures.
 - Liberty recognise that in situations where there are immediate child protection concerns for a child as identified in line with Support Level Guidance, it is NOT to investigate as a single agency, but to act in line with KSCMP guidance which may involve multi-agency decision making.
 - The DSL may seek advice or guidance from their Area Education Safeguarding Advisor from the Education Safeguarding Service before deciding next steps.
 - They may also seek advice or guidance from a social worker at the Front Door service who are the first point of contact for Integrated Children’s Services (ICS).
- In the event of a request for support to the Front Door being necessary, parents/carers will be informed and consent to this will be sought by the DSL in line with guidance provided by KSCMP and ICS. Parents/carers will be informed of this, unless there is a valid reason not to do so, for example, if to do so would put a child at risk of harm or would undermine a criminal investigation.
- If, after a request for support or any other planned external intervention, a child’s situation does not appear to be improving or there is a concern regarding decisions made, the DSL will consider following [KSCMP escalation procedures](#) to ensure their concerns have been addressed.

III. If you see or hear something that is concerning:

- Don’t ignore it or assume that it is someone else’s responsibility to report it.
- Upload all information to the college’s safeguarding system, CPOMS, and seek advice immediately from your DSL.
- Don’t feel silly – if it worries you, someone else needs to know.
- If it is something related to safeguarding, but not a child whose safety is immediately at risk, inform the appropriate Pastoral Leader or safeguarding officer in person and follow up with a one-line email notifying the DSL that there is a safeguarding concern.
- If it is related to a child being at risk, see the DSL or Deputy DSL immediately and definitely before the child goes home that day where possible.
- All staff may raise concerns directly with Children’s Services if they feel an incident is not being dealt with appropriately or they are unable to locate relevant staff.
- Concerns about adults in the college should be made directly to a Director.

29. Appendix 2 – The College’s Statutory Duty & Guidance Documents

This policy sets out how Liberty will meet its statutory duty to safeguard and promote the welfare of our learners. It has been developed in accordance with the law and guidance found at <https://www.gov.uk/> that seeks to protect children.

Further guidance in relation to the safeguarding topics covered in this policy include:

- [Keeping Children Safe in Education: Statutory Guidance for Schools and colleges.](#)
- [Working Together to Safeguard Children.](#)
- [Multi-agency Statutory Guidance on Female Genital Mutilation.](#)
- [Teaching Online Safety in Colleges.](#)
- [Information About Mandatory Reporting of Female Genital Mutilation.](#)
- [Protecting Children from Radicalisation: The Prevent Duty.](#)
- [Prevent Duty Guidance: England and Wales.](#)
- [Inspecting Safeguarding in Maintained Colleges and Academies.](#)
- [Inspecting Safeguarding in Early Years, Education and Skills Settings.](#)

- [Preventing Youth Violence and Gang Involvement.](#)
- [Criminal Exploitation of Children and Vulnerable Adults: County Lines.](#)
- [Sexual Offences Act.](#)
- [The Children Act 1989 and 2004 and The Education Act 2002.](#)
- [Mental Health and Behaviour in Colleges: Departmental Advice.](#)
- [Multi-Agency Statutory Guidance on Female Genital Mutilation.](#)
- [Learning Together to Be Safe - a toolkit to help colleges contribute to the prevention of violent extremism.](#)
- [The Prevent Strategy: A Guide for Local Partners in England.](#)
- <https://www.gov.uk/government/collections/secondary-college-teachers-useful-information>
- <https://www.gov.uk/government/publications/teachers-standards>

If anyone wishes to seek further information or guidance, they can refer to the above documents.

30. Appendix 3 – KCSIE 2021 Part 5 Guidance

The following guidance is taken directly from Keeping Children Safe in Education 2021, Part 5. It discusses the procedures and guidance set out for cases involving child on child sexual violence and sexual harassment in schools and colleges.

Part Five: Child on Child Sexual Violence and Sexual Harassment

Sexual violence and sexual harassment can occur between two children of any age and sex, from primary through to secondary stage and into colleges. It can occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Sexual violence and sexual harassment exist on a continuum and may overlap; they can occur online and face to face (both physically and verbally) and are never acceptable. As set out in Part One of this guidance, all staff working with children are advised to maintain an attitude of 'it could happen here'.

Addressing inappropriate behaviour (even if it appears to be relatively innocuous) can be an important intervention that helps prevent problematic, abusive and/or violent behaviour in the future. Children who are victims of sexual violence and sexual harassment wherever it happens, will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school or college. As set out in Part One of this guidance, schools and colleges should be aware that safeguarding incidents and/or behaviours can be associated with factors outside the school or college, including intimate personal relationships (see also sections on child sexual exploitation and child criminal exploitation at paragraphs 33-39).

Whilst any report of sexual violence or sexual harassment should be taken seriously, staff should be aware it is more likely that girls will be the victims of sexual violence and sexual harassment and more likely it will be perpetrated by boys. But it is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

You should read Part Five alongside the Departmental advice: Sexual Violence and Sexual Harassment Between Children in Schools and colleges. It contains further detailed information on:

- what sexual violence and sexual harassment constitutes
- important context to be aware of, including; what is consent, power imbalances, and developmental stages
- harmful sexual behaviour (HSB), including that a child displaying HSB may be an indication that they are a victim of abuse themselves,
- related legal responsibilities for schools and colleges,
- advice on a whole school or college approach to preventing child on child sexual violence and sexual harassment, and

- more detailed advice on responding to reports of sexual violence and sexual harassment, including safeguarding and supporting both the victim(s) and alleged perpetrator(s).

Responding to reports of sexual violence and sexual harassment

Part Two of this guidance is clear that systems should be in place (and they should be well promoted, easily understood and easily accessible) for children to confidently report abuse, knowing their concerns will be treated seriously. Schools and colleges not recognising, acknowledging or understanding the scale of harassment and abuse and/or downplaying some behaviours related to abuse can lead to a culture of unacceptable behaviour, an unsafe environment and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it.

Reports of sexual violence and sexual harassment are likely to be complex and require difficult professional decisions to be made, often quickly and under pressure. Pre-planning, effective training and effective policies will provide schools and colleges with the foundation for a calm, considered and appropriate response to any reports. The directors should ensure that the college contributes to multi-agency working in line with statutory guidance Working Together to Safeguard Children.

This part of the guidance does not attempt to provide (nor would it be possible to provide) detailed guidance on what to do in any or every particular case. The guidance provides effective safeguarding practice and principles for schools and colleges to consider in their decision-making process. Ultimately, any decisions are for the school or college to make on a case-by-case basis, with the designated safeguarding lead (or a deputy) taking a leading role and using their professional judgement, supported by other agencies, such as children's social care and the police as required.

There is support available for schools and colleges. Paragraph 52 and Annex A in the Sexual Violence and Sexual Harassment Between Children in Schools and colleges advice provides detailed information and links to resources.

Responding to the report

It is important to note that children may not find it easy to tell staff about their abuse verbally. Children can show signs or act in ways that they hope adults will notice and react to. In some cases, the victim may not make a direct report. For example, a friend may make a report or a member of school or college staff may overhear a conversation that suggests a child has been harmed or a child's own behaviour might indicate that something is wrong. As per Part One of this guidance, if staff have any concerns about a child's welfare, they should act on them immediately rather than wait to be told.

The school's or college's initial response to a report from a child is incredibly important. How the school or college responds to a report can encourage or undermine the confidence of future victims of sexual violence and sexual harassment to report or come forward. It is essential that all victims are reassured that they are being taken seriously, regardless of how long it has taken them to come forward and that they will be supported and kept safe. Abuse that occurs online or outside of the school or college should not be downplayed and should be treated equally seriously. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report or their experience minimised.

As per Part One of this guidance, all staff should be trained to manage a report. Local policies (and training) will dictate exactly how reports should be managed. However, effective safeguarding practice includes:

- if possible, managing reports with two members of staff present, (preferably one of them being the designated safeguarding lead or a deputy). However, this might not always be possible;
- where the report includes an online element, being aware of searching screening and confiscation advice (for schools) and UKCIS Sharing nudes and semi-nudes: advice for education settings working with children and young people. The key consideration is for staff not to view or forward illegal images of a child.

The highlighted advice provides more details on what to do when viewing an image is unavoidable. In some cases, it may be more appropriate to confiscate any devices to preserve any evidence and hand them to the police for inspection;

- not promising confidentiality at this initial stage as it is very likely a concern will have to be shared further (for example, with the designated safeguarding lead or children's social care) to discuss next steps. Staff should only share the report with those people who are necessary in order to progress it. It is important that the victim understands what the next steps will be and who the report will be passed to;
- recognising that a child is likely to disclose to someone they trust: this could be anyone on the school or college staff. It is important that the person to whom the child discloses recognises that the child has placed them in a position of trust. They should be supportive and respectful of the child;
- recognising that an initial disclosure to a trusted adult may only be the first incident reported, rather than representative of a singular incident and that trauma can impact memory and so children may not be able to recall all details or timeline of abuse;
- keeping in mind that certain children may face additional barriers to telling someone because of their vulnerability, disability, sex, ethnicity and/or sexual orientation;
- listening carefully to the child, reflecting back, using the child's language, being non-judgmental, being clear about boundaries and how the report will be progressed, not asking leading questions and only prompting the child where necessary with open questions – where, when, what, etc. It is important to note that whilst leading questions should be avoided, staff can ask children if they have been harmed and what the nature of that harm was;
- considering the best way to make a record of the report. Best practice is to wait until the end of the report and immediately write up a thorough summary. This allows the staff member to devote their full attention to the child and to listen to what they are saying. It may be appropriate to make notes during the report (especially if a second member of staff is present). However, if making notes, staff should be conscious of the need to remain engaged with the child and not appear distracted by the note taking.

Either way, it is essential a written record is made;

- only recording the facts as the child presents them. The notes should not reflect the personal opinion of the note taker. Schools and colleges should be aware that notes of such reports could become part of a statutory assessment by children's social care and/or part of a criminal investigation; and
- informing the designated safeguarding lead (or deputy), as soon as practically possible, if the designated safeguarding lead (or deputy) is not involved in the initial report.

Risk assessment

When there has been a report of sexual violence, the designated safeguarding lead (or a deputy) should make an immediate risk and needs assessment. Where there has been a report of sexual harassment, the need for a risk assessment should be considered on a case-by-case basis. The risk and needs assessment should consider:

- the victim, especially their protection and support;
- whether there may have been other victims,
- the alleged perpetrator(s); and
- all the other children, (and, if appropriate, adult learners and staff) at the school or college, especially
- any actions that are appropriate to protect them from the alleged perpetrator(s), or from future harms.

Risk assessments should be recorded (written or electronic) and should be kept under review. At all times, the school or college should be actively considering the risks posed to all their learners and learners and put adequate measures in place to protect them and keep them safe. The designated safeguarding lead (or a deputy) should ensure they are engaging with children's social care and specialist services as required. Where there has been a report of sexual violence, it is likely that professional risk assessments by social workers and or sexual violence specialists will be required. The above school or college risk assessment is not intended to replace the detailed assessments of expert professionals. Any such professional assessments should be used to inform the school's or college's approach to supporting and protecting their learners and learners and updating their own risk assessment.

Action following a report of sexual violence and/or sexual harassment

As set out above, sexual violence and sexual abuse can happen anywhere, and all staff working with children are advised to maintain an attitude of 'it could happen here'. Schools and colleges should be aware of, and respond appropriately to, all reports and concerns about sexual violence and/or sexual harassment both online and offline, including those that have happened outside of the school/college. The designated safeguarding lead (or deputy) is likely to have a complete safeguarding picture and be the most appropriate person to advise on the school's or college's initial response. Important considerations will include:

- the wishes of the victim in terms of how they want to proceed. This is especially important in the context of sexual violence and sexual harassment. Victims should be given as much control as is reasonably possible over decisions regarding how any investigation will be progressed and any support that they will be offered. This will however need to be balanced with the school's or college's duty and responsibilities to protect other children;
- the nature of the alleged incident(s), including whether a crime may have been committed and/or whether HSB has been displayed;
- the ages of the children involved;
- the developmental stages of the children involved;
- any power imbalance between the children. For example, is the alleged perpetrator(s) significantly older, more mature or more confident? Does the victim have a disability or learning difficulty?;
- if the alleged incident is a one-off or a sustained pattern of abuse (sexual abuse can be accompanied by other forms of abuse and a sustained pattern may not just be of a sexual nature);
- that sexual violence and sexual harassment can take place within intimate personal relationships between peers;
- are there ongoing risks to the victim, other children, adult learners or school or college staff; and,
- other related issues and wider context, including any links to child sexual exploitation and child criminal exploitation.

As always when concerned about the welfare of a child, all staff should act in the best interests of the child. In all cases, schools and colleges should follow general safeguarding principles as set out throughout this guidance. Immediate consideration should be given as to how best to support and protect the victim and the alleged perpetrator(s) (and any other children involved/impacted).

The starting point regarding any report should always be that there is a zero-tolerance approach to sexual violence and sexual harassment and it is never acceptable and it will not be tolerated. It is especially important not to pass off any sexual violence or sexual harassment as "banter", "just having a laugh", "part of growing up" or "boys being boys" as this can lead to a culture of unacceptable behaviours and an unsafe environment for children.

Options to manage the report

It is important that schools and colleges consider every report on a case-by-case basis as per paragraph 448. When to inform the alleged perpetrator(s) will be a decision that should be carefully considered. Where a report is going to be made to children's social care and/or the police, then, as a general rule, the school or college should speak to the relevant agency and discuss next steps and how the alleged perpetrator(s) will be informed of the allegations. However, as per general safeguarding principles, this does not and should not stop the school or college taking immediate action to safeguard their children, where required.

There are four likely scenarios for schools and colleges to consider when managing any reports of sexual violence and/or sexual harassment. It will be important in all scenarios that decisions and actions are regularly reviewed and that relevant policies are updated to reflect lessons learnt. It is particularly important to look out for potential patterns of concerning, problematic or inappropriate behaviour.

Where a pattern is identified, the school or college should decide on a course of action. Consideration should be given to whether there are wider cultural issues within the school or college that enabled the inappropriate behaviour to occur and where appropriate extra teaching time and/or staff training could be delivered to minimise the risk of it happening again. The four scenarios are:

1. Manage Internally

- In some cases of sexual harassment, for example, one-off incidents, the school or college may take the view that the children concerned are not in need of early help or that referrals need to be made to statutory services and that it would be appropriate to handle the incident internally, perhaps through utilising their behaviour policy and by providing pastoral support.
- Whatever the response, it should be underpinned by the principle that there is a zero tolerance approach to sexual violence and sexual harassment and it is never acceptable and will not be tolerated.
- All concerns, discussions, decisions and reasons for decisions should be recorded (written or electronic).

2. Early Help

- In line with 1 above, the school or college may decide that the children involved do not require referral to statutory services but may benefit from early help. Early help means providing support as soon as a problem emerges, at any point in a child's life. Providing early help is more effective in promoting the welfare of children than reacting later. Early help can be particularly useful to address non-violent HSB and may prevent escalation of sexual violence. It is particularly important that the designated safeguarding lead (and their deputies) know what the Early Help process is and how and where to access support.
- More information on Early Help is set out in Part One of this guidance with full details of the early help process in Chapter one of Working Together to Safeguard Children.
- Multi-agency early help will work best when placed alongside strong school or college policies, preventative education and engagement with parents and carers.
- Early help and the option to manage a report internally do not need to be mutually exclusive: a school could manage internally and seek early help for both the victim and perpetrator(s).
- Whatever the response, it should be under-pinned by the principle that there is zero tolerance approach to sexual violence and sexual harassment and it is never acceptable and will not be tolerated.
- All concerns, discussions, decisions and reasons for decisions should be recorded (written or electronic).

3. Referrals to Children's Social Care

- Where a child has been harmed, is at risk of harm, or is in immediate danger, schools and colleges should make a referral to local children's social care.
- At the point of referral to children's social care, schools and colleges will generally inform parents or carers, unless there are compelling reasons not to (if informing a parent or carer is going to put the child at additional risk). Any such decision should be made with the support of children's social care.
- If a referral is made, children's social care will then make enquiries to determine whether any of the children involved are in need of protection or other services.
- Where statutory assessments are appropriate, the school or college (especially the designated safeguarding lead or a deputy) should be working alongside, and cooperating with, the relevant lead social worker. Collaborative working will help ensure the best possible package of coordinated support is implemented for the victim and, where appropriate, the alleged perpetrator(s) and any other children that require support.
- Schools and colleges should not wait for the outcome (or even the start) of a children's social care investigation before protecting the victim and other children in the school or college. It will be important for the designated safeguarding lead (or a deputy) to work closely with children's social care (and other agencies as required) to ensure any actions the school or college takes do not jeopardise a statutory investigation. The risk assessment as per paragraph 444-446 will help inform any decision. Consideration of safeguarding the victim, alleged perpetrator(s), any other children directly involved in the safeguarding report and all children at the school or college should be immediate.

- In some cases, children's social care will review the evidence and decide a statutory intervention is not appropriate. The school or college (generally led by the designated safeguarding lead or a deputy) should be prepared to refer again if they believe the child remains in immediate danger or at risk of harm. If a statutory assessment is not appropriate, the designated safeguarding lead (or a deputy) should consider other support mechanisms such as early help, specialist support and pastoral support.
- Whatever the response, it should be under-pinned by the principle that there is a zero-tolerance approach to sexual violence and sexual harassment and it is never acceptable and will not be tolerated.
- All concerns, discussions, decisions and reasons for decisions should be recorded (written or electronic).

4. Reporting to the Police

- Any report to the police will generally be in parallel with a referral to children's social care (as above).
- It is important that the designated safeguarding lead (and their deputies) are clear about the local process for referrals and follow that process.
- Where a report of rape, assault by penetration or sexual assault is made, the starting point is that this should be passed on to the police. Whilst the age of criminal responsibility is ten, if the alleged perpetrator(s) is under ten, the starting principle of reporting to the police remains. The police will take a welfare, rather than a criminal justice, approach. The following advice may help schools and colleges decide when to engage the Police and what to expect of them when they do: When to call the police.
- Where a report has been made to the police, the school or college should consult the police and agree what information can be disclosed to staff and others, in particular, the alleged perpetrator(s) and their parents or carers. They should also discuss the best way to protect the victim and their anonymity.
- At this stage, schools and colleges will generally inform parents or carers unless there are compelling reasons not to, for example, if informing a parent or carer is likely to put a child at additional risk. In circumstances where parents or carers have not been informed, it will be especially important that the school or college is supporting the child in any decision they take. This should be with the support of children's social care and any appropriate specialist agencies.
- All police forces in England have specialist units that investigate child abuse. The names and structures of these units are matters for local forces. It will be important that the designated safeguarding lead (and their deputies) are aware of their local arrangements.
- In some cases, it may become clear very quickly that the police (for whatever reason) will not take further action. In such circumstances, it is important that the school or college continue to engage with specialist support for the victim and alleged perpetrator(s) as required.
- Whilst protecting children and/or taking any disciplinary measures against the alleged perpetrator(s), it will be important for the designated safeguarding lead (or a deputy) to work closely with the police (and other agencies as required), to ensure any actions the school or college take do not jeopardise the police investigation.
- If schools or colleges have questions about the investigation, they should ask the police. The police will help and support the school or college as much as they can (within the constraints of any legal restrictions).
- Whatever the response, it should be under-pinned by the principle that there is a zero tolerance approach to sexual violence and sexual harassment and it is never acceptable and will not be tolerated.
- All concerns, discussions, decisions and reasons for decisions should be recorded (written or electronic). Considering bail conditions
- The police will consider what action to take to manage the assessed risk of harm. This could involve the use of police bail with conditions, prior to a suspect appearing in court, or court bail with or without conditions after the first appearance.
- Alternatively, the person suspected of an offence could be 'released under investigation' (RUI). People released under RUI can have no conditions attached to their release from custody and it is possible for a person on bail also to have no conditions.

- Whatever arrangements are in place, the school or college will need to consider what additional measures may be necessary to manage any assessed risk of harm that may arise within their institution.
- Particular regard should be given to: the additional stress and trauma that might be caused to a victim within the institution; the potential for the suspected person to intimidate the victim or a witness; the need to ensure that any risk management measures strike a balance between management of risk and the rights of an unconvicted person (e.g. rights to privacy, family life, etc).
- Careful liaison with the police investigators should help to develop a balanced set of arrangements.
- Managing any delays in the criminal process
- There may be delays in any case that is being progressed through the criminal justice system. Schools and colleges should not wait for the outcome (or even the start) of a police investigation before protecting the victim, alleged perpetrator(s) and other children in the school or college. The risk assessment as per paragraph 444-446 will help inform any decision.

The End of The Criminal Process

- If a child is convicted or receives a caution for a sexual offence, the school or college should update its risk assessment, ensure relevant protections are in place for all the children at the school or college and, if it has not already, consider any suitable action in line with their behaviour policy. This process should include a review of the necessary actions to keep all parties safe and meet their needs. If the perpetrator(s) remains in the same school or college as the victim, the school or college should be very clear as to their expectations regarding the perpetrator(s) now they have been convicted or cautioned. This could include expectations regarding their behaviour and any restrictions the school or college thinks are reasonable and proportionate with regard to the perpetrator(s)' timetable.
- Any conviction (even with legal anonymity reporting restrictions) is potentially going to generate interest among other learners or learners in the school or college. It will be important that the school or college ensure both the victim and perpetrator(s) remain protected, especially from any bullying or harassment (including online).
- Where cases are classified as "no further action" (NFA'd) by the police or Crown Prosecution Service, or where there is a not guilty verdict, the school or college should continue to offer support to the victim and the alleged perpetrator(s) for as long as is necessary. A not guilty verdict or a decision not to progress with their case will likely be traumatic for the victim. The fact that an allegation cannot be substantiated or was withdrawn does not necessarily mean that it was unfounded. Schools and colleges should discuss any decisions with the victim in this light and continue to offer support. The alleged perpetrator(s) is also likely to require ongoing support for what will have likely been a difficult experience.

Unsubstantiated, unfounded, false or malicious reports

As set out in paragraph 71 of Part one of this guidance, all concerns, discussions and decisions made, and the reasons for those decisions, should be recorded in writing. Records should be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified, and addressed. If a report is determined to be unsubstantiated, unfounded, false or malicious, the designated safeguarding lead should consider whether the child and/or the person who has made the allegation is in need of help or may have been abused by someone else and this is a cry for help. In such circumstances, a referral to children's social care may be appropriate.

If a report is shown to be deliberately invented or malicious, the school or college, should consider whether any disciplinary action is appropriate against the individual who made it as per their own behaviour policy.

Ongoing response Safeguarding and supporting the victim

The following principles are based on effective safeguarding practice and should help shape any decisions regarding safeguarding and supporting the victim.

- The needs and wishes of the victim should be paramount (along with protecting the child) in any response. It is important they feel in as much control of the process as is reasonably possible.

Wherever possible, the victim, if they wish, should be able to continue in their normal routine. Overall, the priority should be to make the victim's daily experience as normal as possible, so that the school or college is a safe space for them.

- Consider the age and the developmental stage of the victim, the nature of the allegations and the potential risk of further abuse. Schools and colleges should be aware that, by the very nature of sexual violence and sexual harassment, a power imbalance is likely to have been created between the victim and alleged perpetrator(s).
- The victim should never be made to feel they are the problem for making a report or made to feel ashamed for making a report.
- Consider the proportionality of the response. Support should be tailored on a case-by-case basis. The support required regarding a one-off incident of sexualised name-calling is likely to be vastly different from that for a report of rape.
- Schools should be aware that sexual assault can result in a range of health needs, including physical, mental, and sexual health problems and unwanted pregnancy. Children and young people that have a health need arising from sexual assault or abuse can access specialist NHS support from a Sexual Assault Referral Centre (SARC). SARCs offer confidential and non-judgemental support to victims and survivors of sexual assault and abuse. They provide medical, practical, and emotional care and advice to all children and adults, regardless of when the incident occurred.

Support can include:

- Early help and children's social care as set out in Part One of this guidance.
- Children and Young People's Independent Sexual Violence Advisors (ChISVAs) provide emotional and practical support for victims of sexual violence. They are based within the specialist sexual violence sector and will help the victim understand what their options are and how the criminal justice process works if they have reported or are considering reporting to the police. ChISVAs will work in partnership with schools and colleges to ensure the best possible outcomes for the victim. Police and social care agencies can signpost to ChISVA services (where available) or referrals can be made directly to the ChISVA service by the young person or school or college. Contact details for ChISVAs can be found at Rape Crisis and The Survivors Trust.
- Child and adolescent mental health services (CAMHS) is used as a term for all services that work with children who have difficulties with their emotional or behavioural wellbeing. Services vary depending on local authority. Most CAMHS have their own website, which will have information about access, referrals and contact numbers.
- The specialist sexual violence sector can provide therapeutic support for children who have experienced sexual violence. Contact Rape Crisis (England & Wales) or The Survivors Trust for details of local specialist organisations. The Male Survivors Partnership can provide details of services which specialise in supporting men and boys.
- Rape and sexual assault referral centres services can be found at: Find Rape and sexual assault referral centres. Sexual assault referral centres (SARCs) offer medical, practical and emotional support. They have specially trained doctors, nurses and support workers. If children, young people, or their families are unsure which service to access, they should contact their GP or call the NHS on 111.
- Childline provides free and confidential advice for children and young people.
- Internet Watch Foundation works internationally to remove child sexual abuse online images and videos and offers a place for the public to report them anonymously.
- Childline / IWF: Remove a nude image shared online Report Remove is a free tool that allows children to report nude or sexual images and videos of themselves that they think might have been shared online, to see if they can be removed from the internet.

Victims may not talk about the whole picture immediately. They may be more comfortable providing information on a piecemeal basis. It is essential that dialogue is kept open and encouraged. When it is clear that ongoing support will be required, schools and colleges should ask the victim if they would find it helpful to have a designated trusted adult (for example, their form tutor or designated safeguarding lead) to talk to about their needs. The choice of any such adult should be the victim's (as far as reasonably possible). Schools and colleges should respect and support this choice.

A victim of sexual violence is likely to be traumatised and, in some cases, may struggle in a normal classroom environment. While schools and colleges should avoid any action that would have the effect of isolating the victim, in particular from supportive peer groups, there may be times when the victim finds it difficult to maintain a full-time timetable and may express a wish to withdraw from lessons and activities. This should be because the victim wants to, not because it makes it easier to manage the situation. If required, schools and colleges should provide a physical space for victims to withdraw.

It may be necessary for schools and colleges to maintain arrangements to protect and support the victim for a long time. Schools and colleges should be prepared for this and should work with children's social care and other agencies as required. It is therefore important that the designated safeguarding lead knows how and where to seek support.

It is important that the school or college do everything they reasonably can to protect the victim from bullying and harassment as a result of any report they have made. Whilst they should be given all the necessary support to remain in their school or college, if the trauma results in the victim being unable to do this, alternative provision or a move to another school or college should be considered to enable them to continue to receive suitable education. This should only be at the request of the victim (and following discussion with their parents or carers).

It is important that if the victim does move to another educational institution (for any reason), that the new educational institution is made aware of any ongoing support needs. The designated safeguarding lead should take responsibility to ensure this happens (and should discuss with the victim and, where appropriate their parents or carers as to the most suitable way of doing this) as well as transferring the child protection file. Information sharing advice referenced at paragraphs 105-113 will help support this process.

Safeguarding and supporting the alleged perpetrator(s) and children and young people who have displayed harmful sexual behaviour

Advice about safeguarding and supporting the alleged perpetrators is also set out in departmental advice: Sexual violence and sexual harassment between children at schools and colleges. The following principles are based on effective safeguarding practice and should help shape any decisions regarding safeguarding and supporting the alleged perpetrator(s):

- The school or college will have a difficult balancing act to consider. On one hand, they need to safeguard the victim (and the wider learner/learner body) and on the other hand provide the alleged perpetrator(s) with an education, safeguarding support as appropriate and implement any disciplinary sanctions. Taking disciplinary action and still providing appropriate support are not mutually exclusive actions. They can, and should, occur at the same time if necessary.
- Consider the age and the developmental stage of the alleged perpetrator(s), the nature of the allegations and frequency of allegations. Any child will likely experience stress as a result of being the subject of allegations and/or negative reactions by their peers to the allegations against them.
- Consider the proportionality of the response. Support (and sanctions) should be considered on a case by-case basis. The alleged perpetrator(s) may potentially have unmet needs (in some cases these may be considerable) as well as potentially posing a risk of harm to other children. HSB in young children may be (and often are) a symptom of either their own abuse or exposure to abusive practices and or materials. More information on HSB can be found at paras 18-22 of the detailed advice, Sexual violence and sexual harassment between children at schools and colleges. Advice should be taken, as appropriate, from children's social care, specialist sexual violence services and the police. The NSPCC also provides free and independent advice about HSB.
- The Lucy Faithfull Foundation has developed a HSB toolkit, which amongst other things, provides support, advice and information on how to prevent it, links to organisations and helplines, resources about HSB by children, internet safety, sexual development and preventing child sexual abuse.
- The NSPCC provides free and independent advice about HSB: NSPCC Learning: Protecting children from harmful sexual behaviour and NSPCC - Harmful sexual behaviour framework.
- Contextual Safeguarding Network – Beyond Referrals (Schools) provides a school self-assessment toolkit and guidance for addressing HSB in schools.

- StopItNow - Preventing harmful sexual behaviour in children - Stop It Now provides a guide for parents, carers and professionals to help everyone do their part in keeping children safe, they also run a free confidential helpline.
- It is important that the perpetrator(s) is/are also given the correct support to try to stop them re offending and to address any underlying trauma that may be causing this behaviour. Addressing inappropriate behaviour can be an important intervention that helps prevent problematic, abusive and or violent behaviour in the future.
- Advice on behaviour and discipline in schools is clear that teachers can discipline learners whose conduct falls below the standard which could be reasonably expected of them. If the perpetrator(s) is to be excluded the decision must be lawful, reasonable and fair. Further information about exclusions can be found in statutory guidance for schools Exclusions from maintained schools, academies and PRUs.
- School can be a significant protective factor for children who have displayed HSB, and continued access to school, with a comprehensive safeguarding management plan in place, is an important factor to consider before final decisions are made. It is important that if an alleged perpetrator does move to another educational institution (for any reason), that the new educational institution is made aware of any ongoing support needs and where appropriate, potential risks to other children and staff. The designated safeguarding lead should take responsibility to ensure this happens as well as transferring the child protection file. Information sharing advice referenced at paragraphs 105-113 will help support this process.

31. Appendix 4 – Liberty Safeguarding Contacts Poster



Safeguarding Team

Safeguarding is everyone's responsibility

We want all learners at Liberty to feel safe and to know that there is someone they can turn to if they are worried about anything.



Michelle Smith

Designated Safeguarding Lead

Role: Director

michelle@libertygrouppltd.co.uk



Lauren Lawley

Deputy Designated Safeguarding Lead

Role: Tutor

lauren@libertygrouppltd.co.uk



Jojo Rassekh

Deputy Designated Safeguarding Lead

Role: Director

jojo@libertygrouppltd.co.uk

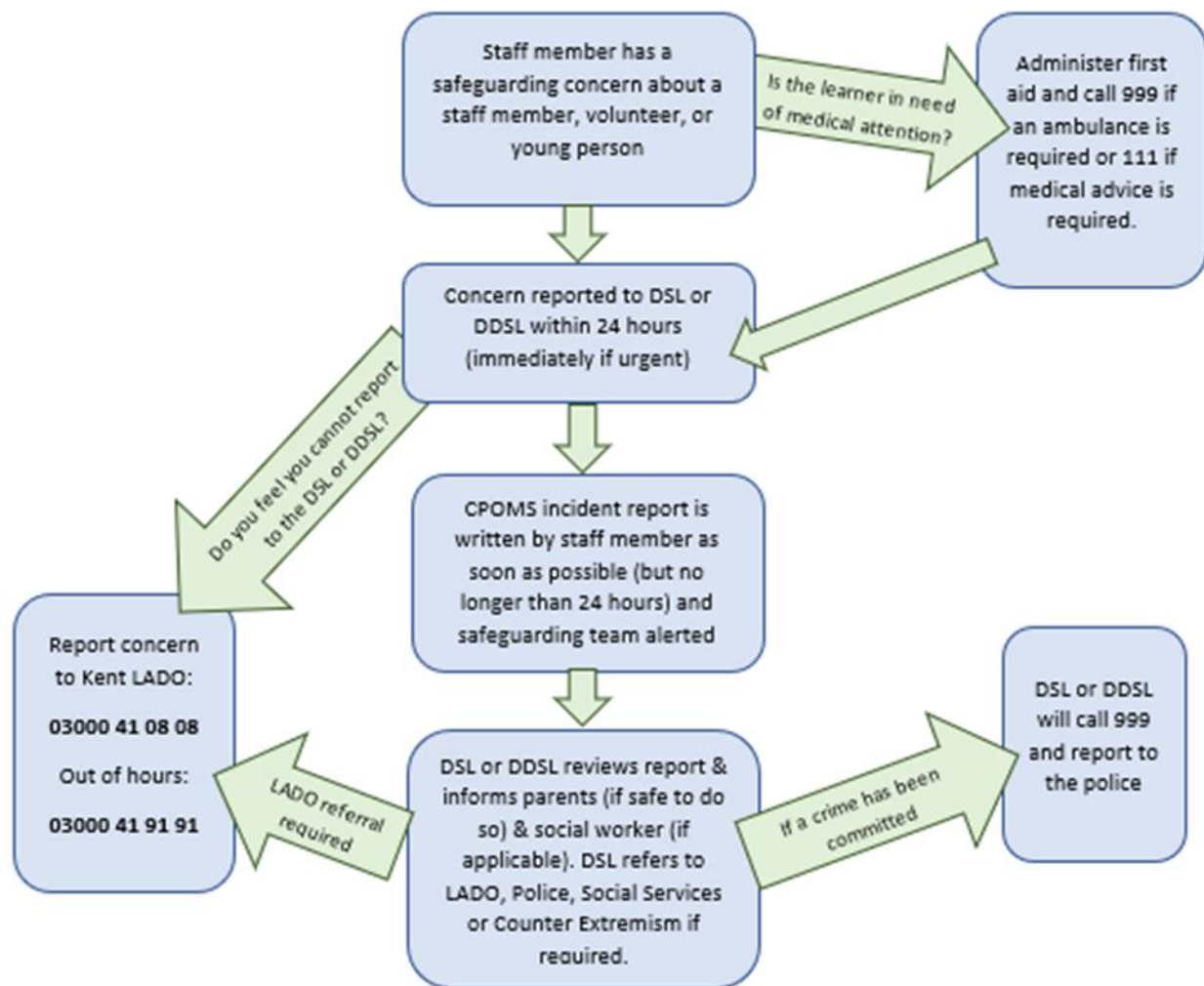
If something is bothering you, then please speak to a member of the Liberty Safeguarding Team. If you are unable to locate any of the safeguarding team, please call 01843 446906 between Monday to Friday 8:30 am to 4:30 pm.

Head Office - Paragon House, Albert Street, Ramsgate, CT11 6WQ Tel: 01843 446906
Web: www.libertygrouppltd.co.uk Company Registration Numbers Liberty Training Ltd 08352863

Safeguarding Poster
Created by [M. Smith](#) April 2022

32. Appendix 5 – How to Report Concerns Flowchart

How to report concerns



Your DSL is Michelle Smith. Contact: 07946032122 or michelle@libertygrouppltd.co.uk

Your Mental Health Lead is Michelle Smith. Contact: 07946032122 or michelle@libertygrouppltd.co.uk

Your DDSL is Lauren Lawley. Contact: 01843 446906 or lauren@libertygrouppltd.co.uk

Your DDSL is Jojo Rassekh. Contact: 01843 446906 or jojo@libertygrouppltd.co.uk

The Education Safeguarding Service Area Office - Thanet: 03301 651140

Social Services - During Office Hours: 03000 411 111 (under 18) or 03000 416 161 (over 18)

Social Services - Out of Office Hours: 03000 419 191

Risk of Extremism: 020 7340 7264

33. Appendix 6 – Support Organisations

NSPCC ‘Report Abuse in Education’ Helpline

- [0800 136 663](tel:0800136663) or help@nspcc.org.uk

National Organisations

- NSPCC: www.nspcc.org.uk
- Barnardo's: www.barnardos.org.uk
- Action for Children: www.actionforchildren.org.uk
- Children's Society: www.childrenssociety.org.uk

Support for Staff

- Education Support Partnership: www.educationsupportpartnership.org.uk
- Professional Online Safety Helpline: www.saferinternet.org.uk/helpline
- Harmful Sexual Behaviour Support Service: <https://swgfl.org.uk/harmful-sexual-behaviour-support-service>

Support for Learners

- ChildLine: www.childline.org.uk
- Papyrus: www.papyrus-uk.org
- The Mix: www.themix.org.uk
- Shout: www.giveusashout.org
- Fearless: www.fearless.org
- Victim Support: www.victimsupport.org.uk

Support for Adults

- Family Lives: www.familylives.org.uk
- Crime Stoppers: www.crimestoppers-uk.org
- Victim Support: www.victimsupport.org.uk
- The Samaritans: www.samaritans.org
- NAPAC (National Association for People Abused in Childhood): www.napac.org.uk
- MOSAC: www.mosac.org.uk
- Action Fraud: www.actionfraud.police.uk
- Shout: www.giveusashout.org
- Advice now: www.advicenow.org.uk

Support for Learning Disabilities

- Respond: www.respond.org.uk
- Mencap: www.mencap.org.uk
- Council for Disabled Children: <https://councilfordisabledchildren.org.uk>

Contextual Safeguarding Network

- <https://contextualsafeguarding.org.uk/>

Kent Resilience Hub

- <https://kentresiliencehub.org.uk/>

Substance Misuse

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

Domestic Abuse

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

Criminal and Sexual Exploitation

- National Crime Agency: www.nationalcrimeagency.gov.uk/who-we-are
- It's not okay: www.itsnotokay.co.uk

- NWG Network: www.nwgnetwork.org

Honour Based Abuse

- Forced Marriage Unit: www.gov.uk/guidance/forced-marriage
- FGM Factsheet: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/496415/1639_HO_SP_FGM_mandatory_reporting_Fact_sheet_Web.pdf
- Mandatory reporting of female genital mutilation: procedural information: www.gov.uk/government/publications/mandatory-reporting-of-female-genital-mutilation-procedural-information

Peer on Peer abuse, including bullying, sexual violence and harassment

- Rape Crisis: <https://rapecrisis.org.uk>
- Brook: www.brook.org.uk
- Disrespect Nobody: www.disrespectnobody.co.uk
- Upskirting – know your rights: www.gov.uk/government/news/upskirting-know-your-rights
- Lucy Faithfull Foundation: www.lucyfaithfull.org.uk
- Stop it Now! www.stopitnow.org.uk
- Parents Protect: www.parentsprotect.co.uk
- Anti-Bullying Alliance: www.anti-bullyingalliance.org.uk
- Diana Award: www.antibullyingpro.com/
- Bullying UK: www.bullying.co.uk
- Kidscape: www.kidscape.org.uk

Online Safety

- CEOP: www.ceop.police.uk
- Internet Watch Foundation (IWF): www.iwf.org.uk
- Think U Know: www.thinkuknow.co.uk
- Childnet: www.childnet.com
- UK Safer Internet Centre: www.saferinternet.org.uk
- Report Harmful Content: <https://reportharmfulcontent.com>
- Marie Collins Foundation: www.mariecollinsfoundation.org.uk
- Internet Matters: www.internetmatters.org
- NSPCC: www.nspcc.org.uk/online-safety
- Get Safe Online: www.getsafeonline.org
- Parents Protect: www.parentsprotect.co.uk
- Cyber Choices: <https://nationalcrimeagency.gov.uk/what-we-do/crime-threats/cyber-crime/cyberchoices>
- National Cyber Security Centre (NCSC): www.ncsc.gov.uk

Mental Health

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

Radicalisation and hate

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

Children with Family Members in Prison

- National information Centre on Children of Offenders (NICCO): <https://www.nicco.org.uk/>

34. Appendix 7 – Prevent Duty Risk Assessment

Leadership

| HAZARD | WHO IS AT RISK? | ACTIONS IN PLACE | PERSON RESPONSIBLE | RISK LEVEL | ADDITIONAL NOTES / NEXT STEPS |
|---|--------------------|--|--------------------|------------|--|
| <p>The values and ethos of the college are unsuitable for promoting resilience against extremist ideologies and promoting British values.</p> <p>Leaders are unaware of their responsibilities under the Prevent duty, and of the context of the college relating to the risk of extremism.</p> <p>The result is that the organisation does not attach sufficient priority to Prevent Action plans (or does not have one) and therefore action to mitigate risks and meet the requirements of the Duty are not effective.</p> <p>SLT assumes that the basics are sufficient and are not vigilant with ongoing development and consistent review of local and national developments.</p> <p>SLT have a complacency about how extremism and radicalisation may be prevalent in the local area and within the organisation</p> | Learners and staff | <p>The college values clearly set out our commitment to British values.</p> <p>Core Values are displayed on our website and throughout the college.</p> <p>Values include a commitment to tolerance, <u>diversity</u> and mutual respect.</p> <p>SLT are aware of their duty to prevent learners being drawn into terrorism, and make sure all staff know the same.</p> <p>SLT stay up to date with local developments and risks.</p> <p>SLT are aware of the Prevent Duty, having completed basic e-learning, read guidance from Ofsted and other government publications.</p> <p>The need for additional and in-depth courses for at least one SLT member and the DSLs has been recognised and will be a priority to identify and complete.</p> <p>Policies are in place in recognising potential safeguarding concerns around extremism and radicalisation and SLT feedback to staff at staff meetings and/or CPD days with any significant changes or updates. Protocols are in place such as referrals and lockdown when there is a suspicion of activity or actual events.</p> <p>Policies are reviewed at least annually, with regard to new information.</p> | DSL | Low | <p>Refresh the leadership team on the college's responsibilities under the Prevent duty.</p> <p>Identify an appropriate in-depth Prevent course which will extend current knowledge and offer additional thoughts around better practices and protocols.</p> <p>Establish more partnership working with external agencies which is appropriate</p> |

Training and capability

| HAZARDS | WHO IS AT RISK? | ACTIONS IN PLACE | PERSON RESPONSIBLE | RISK LEVEL | ADDITIONAL NOTES / NEXT STEPS |
|--|--------------------|--|--------------------|------------|--|
| <p>College staff are unaware of their responsibilities under the Prevent duty, and the need to promote British values.</p> <p>Staff do not support the college's values and ethos, or they support and promote extremist ideas.</p> <p>Leaders and staff feel unable or unwilling to challenge extremist narratives or exemplify British Values throughout the organisation.</p> <p>Staff are unclear on how to deal with or refer concerns resulting in individuals not being supported and potentially radicalisation remaining unchecked.</p> | Learners and staff | <p>All staff have read our safeguarding policy and at least part 1 of Keeping Children Safe in Education. All staff have Prevent training through Kent Safeguarding Multi-Agency Partnership, both face to face and eLearning. Staff complete eLearning annually to refresh knowledge.</p> <p>Staff members are aware that they can go to <u>DSL/ DDSL's</u> for advice, support & to escalate concerns.</p> <p>The staff recruitment process reflects the college's values and promotes good safeguarding practice, safer recruitment procedures are followed.</p> <p>CPD workshops held throughout the year to recap on safeguarding including radicalisation.</p> | DSL | Low | Update our safeguarding policy annually. |

Working in Partnership

| HAZARD | WHO IS AT RISK? | ACTIONS IN PLACE | PERSON RESPONSIBLE | RISK LEVEL | ADDITIONAL NOTES / NEXT STEPS |
|---|--------------------|--|--------------------|------------|--|
| <p>The organisation does not establish effective partnerships with organisations such as the Local Authority, Police Prevent Team, DfE Regional Coordinator and others.</p> <p>Staff do not feel comfortable or capable working with external agencies and sharing concerns about extremism externally.</p> | Learners and staff | <p>We work and communicate with local safeguarding partners and other relevant agencies regarding concerns about extremism.</p> <p>The <u>DSL & DDSL's</u> are aware of the process to contact other agencies and expedite concerns about extremism. Primary contacts within LA's are identified in the safeguarding policy.</p> <p>Records of referrals are kept, and referrals are followed up appropriately. Safeguarding policies promote partnership cooperation.</p> | DSL | Low | Establish better multi-agency links and networking through attending conferences and events. |

Speakers and Events

| HAZARD | WHO IS AT RISK? | ACTIONS IN PLACE | PERSON RESPONSIBLE | RISK LEVEL | ADDITIONAL NOTES / NEXT STEPS |
|--|-----------------|--|--------------------|------------|--|
| Learners are exposed to extremist ideologies by visiting speakers. Inappropriate or extremist materials are shared with learners (face to face or via weblinks) because insufficient checks are made of external speakers and materials that they promote or share. The college site is used to host events which support extremist ideologies or promote hatred | Learners | The materials and resources that visiting speakers deliver are discussed and approved prior to their visit Visitors are never left alone with learners unless they are approved, regular visitors (counsellor, careers advisor). Visitors must provide a valid DBS to be permitted onsite. Those who are unable to do so are fully supervised by a member of staff throughout their visit. We follow a visible ID policy, and those without a DBS must have a red lanyard. The college site will not be let to any outside organisations and premises may only be used by organisations within Liberty Group. | DSL | Low | Continue monitoring of protocols with regards to guest speakers. |

Curriculum and Culture

| HAZARD | WHO IS AT RISK? | ACTIONS IN PLACE | PERSON RESPONSIBLE | RISK LEVEL | ADDITIONAL NOTES / NEXT STEPS |
|--|-----------------|--|--------------------|------------|--|
| The curriculum teaches damaging material or fails to challenge extremist ideologies and promote British values | Learners | Opportunities to promote British values are clearly identified within all curriculum areas. Use of PSHE & tutorial lessons for sensitive and supportive discussions on radical issues and extreme ideologies. | Programme Manager | Low | Review our current practices for promoting British values and consider where we could do more to embed these values into our curriculum. |

| | | | | | |
|--|------------------------------|---|-------------------|--------|--|
| A culture of inequality or abuse is allowed to grow, enabling extremist ideology and hate to develop | Learners, staff, and parents | Our behaviour policy clearly sets out that hateful behaviour is not tolerated. Staff know how to respond to witnessing harassment and abusive behaviour. Learners are encouraged to challenge harassment or abusive behaviour among their peers. | Directors | Medium | |
| British values are not promoted outside of the classroom | Learners and staff | Learners participate in democracy through the YPG Events promoting diversity, human rights, and respect are promoted through themed activities e.g. Pride celebrations Celebrations from multiple religions and cultures are celebrated around the college | Programme Manager | Low | |
| Staff and learners do not understand British Values (or feel confident about) and extremist views and narratives are allowed to flourish unchallenged. | Learners and staff | British Values are promoted in the ethos of Liberty. Everyone is treated fairly and equally, everyone is taught to be aware of the needs of others to have greater tolerance of one another, everyone should have mutual respect with one another and everyone has the same rules to follow, with an understanding of individual needs. Feedback from staff and learners strongly suggests that the general feeling is one of support and encouragement towards one another. Inappropriate views, such as racial slurs, are challenged immediately by staff to set the example that those views are not supported. | | Medium | |

IT and Internet Safety

| HAZARD | WHO IS AT RISK? | ACTIONS IN PLACE | PERSON RESPONSIBLE | RISK LEVEL | ADDITIONAL NOTES / NEXT STEPS |
|--|-----------------|---|--------------------|------------|---|
| Learners use the college network or college hardware to access extremist material | Learners | <p>Our online safety and safeguarding policy <u>makes</u> reference to the risks of online extremist material.</p> <p>Learners are encouraged to report any material they come across online which makes them worried or uncomfortable.</p> <p>The college IT network has appropriate filters to block sites deemed inappropriate or unsafe.</p> <p>All computer systems at Liberty are monitored using protective software managed by an external IT company who specialise in school systems.</p> <p>All learners have individual log-in details which allows for tracking of their internet use.</p> <p>Learners are monitored during lessons when using the computers.</p> <p>Our learner Wi-Fi has appropriate filters to block inappropriate content and learners must sign a user agreement when signing in.</p> <p>Weekly <u>PSHE</u> and tutorial lessons look at various aspects of day-to-day living skills which aim to incorporate British Values to promote positive choices.</p> <p>Any inappropriate use of IT equipment (including <u>learners</u> personal mobile phones) is covered in the learner behaviour policy.</p> | Office Manager | Medium | Review our online safety policy annually. |
| Learners access extremist material on their own devices or on social media, or are specifically targeted for online radicalisation | Learners | <p>The ICT curriculum includes teaching learners how to stay safe online.</p> <p>Parents are provided with support on how to help their children access the internet safely and spot the signs of online radicalisation.</p> | Programme Manager | Medium | Share online safety factsheets with parents to help them support their children |

College Security

| HAZARD | WHO IS AT RISK? | ACTIONS IN PLACE | PERSON RESPONSIBLE | RISK LEVEL | ADDITIONAL NOTES / NEXT STEPS |
|--|--------------------|--|--------------------|------------|---|
| Non-approved visitors access the college site to spread extremist ideology | Learners and staff | <p>All visitors to the college must be signed in at reception and wear ID badges</p> <p>Visitors are to be accompanied around the college site by a member of staff at all times unless we have a copy of their <u>DBS</u> and they are pre-approved.</p> | Office Manager | Low | Review our visitor safeguarding protocols annually. |
| <p>The college does not have sufficient security of its premises and learners are targeted by individuals or groups seeking to share extremist views.</p> <p>On site dangerous or hazardous substances are not kept secure and are allowed into the possession of individuals or groups seeking to use them unlawfully</p> | Learners and staff | <p>The building has a video entry system and magnetic lock system. Access to the building from reception as well as Teaching spaces and offices require magnetic locks to be activated first and only staff have access. The exterior of the building including the courtyard is monitored by CCTV.</p> <p>Learners are monitored during breaks. Those learners identified as posing a risk to themselves or others are supervised at all times, including lunchtimes.</p> <p>Lockdown protocols are in place in the event of an incident within or outside of the building.</p> <p>Cleaning cupboards are kept locked at all times.</p> | Office Manager | Low | Ongoing reviews of current arrangements. |

DATE OF NEXT REVIEW:

SEPTEMBER 2022