

## Bury College Policy and Procedures

### Safeguarding and Prevent Policy

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## SECTION A

### 1. Introduction & Purpose

Bury College recognises that young people and vulnerable adults have a fundamental right to be protected from harm and exploitation and that students cannot learn effectively unless they feel safe and are safe. This policy should be read in conjunction with all other policies. A separate policy is available for Child on child Abuse, Sexual Violence and Sexual Harassment. This policy applies to all students in all types of provision including 16-19, apprentices, adults and high needs. This policy will be implemented to support vulnerable adults all concerns raised regardless of age will be followed up in line with this policy.

The College is committed to ensuring that best practice is adopted when working with all young people and vulnerable adults and that they are supported and protected. The College accepts its legal and moral responsibility to implement procedures, to provide a duty of care to young people and to safeguard their wellbeing and protect them from harm. This Policy details safeguarding arrangements for all students enrolled at the College. The College and all staff have an attitude of '**it could happen here**'. The College will respond appropriately to all concerns, including those outside of college or online.

The College is also committed to the safeguarding and welfare of all our staff and visitors to ensure that everyone who attends the College premises is safe.

The College has a zero-tolerance approach to sexual violence and harassment and it will not be tolerated.

This Policy represents the College's responsibility to protect all students, especially children, young people and vulnerable adults and those with identified needs at all College centres including those on work placement.

All staff are aware that safeguarding incidents and/or behaviours can be associated with factors outside the school or college and/or can occur between children outside of these environments. All staff, but especially the designated safeguarding lead (and deputies) considers whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, and serious youth violence.

Everyone working in or working for the College including sub-contractors, agency staff, shares a common duty to help keep children, young people and vulnerable adults safe by contributing to:

- Providing help and support to meet the needs of children as soon as problems emerge
- Protecting children from maltreatment, inside or outside the home, including online
- providing a safe environment for children, young people and vulnerable adults to learn and develop in our College setting
- identifying children and young people who are suffering or likely to suffer significant harm, and taking appropriate action with the aim of making sure they are kept safe both at home and in our College, setting including off site provision and activity,
- Following the procedures set out by Greater Manchester and Bury's Safeguarding Children's Board, Working Together to Safeguard Children and Keeping Children Safe in Education by:
- Knowing that safeguarding and promoting the welfare of children, young people and vulnerable adults is everyone's responsibility and the voice of the young person is evident
- Protecting young people and vulnerable adults at our College from maltreatment
- Establishing a safe environment in which our students can learn and develop within an

ethos of openness

- Preventing impairment of young people and vulnerable adult's health or development;
- Ensuring young people and vulnerable adults at our College develop knowledge, skills and behaviours in circumstances consistent with the provisions of safe and effective care
- Understanding that no single professional can have the full picture of a young person or vulnerable adult's needs and circumstances. Everyone who comes into contact with young people and their family has a role to play in identifying concerns, sharing information and taking prompt action
- Undertaking the role so as to enable students at our College to have positive outcomes
- Ensuring, as a College we embed safeguarding through clear systems of communication and Continuous Professional Development (CPD) so that safeguarding is a robust element of our College.
- The DSL will ensure that policies, process and procedures for students in sub-contracted provision is safe and robust.

The College has a statutory responsibility to:

- At all times, and seek to create a safe environment for the entire College community. This includes using appropriate filters and monitoring systems (E Safe) to ensure maximum levels of online safety.
- Operate the policy to specifically encompass children, young people, vulnerable adults and adults who may be temporarily vulnerable
- Acknowledge that abuse may take many forms, for example; physical, sexual, financial and material, emotional, neglect, 'Missing', sexual exploitation, human trafficking, female genital mutilation, forced marriage, hate crime, radicalisation, extremism, and risk to self and/or others
- Comply with statutory safeguarding legislation including the Prevent Duty
- Work with external agencies, in particular, the Local Children's Safeguarding Board and the Local Authority Designated Officer, whilst always placing the welfare of the individual at the centre of any action taken
- Comply with the regulations and guidance provided on the vetting of staff, including temporary staff, trainee teachers and volunteers to minimise the risk of recruiting unsuitable people as laid out in the guidance from the Independent Safeguarding Authority and 'Keeping Children Safe in Education'
- Ensure that any safeguarding concern is swiftly referred as appropriate. Non-emergency referrals to be communicated to partner agencies within one working day of disclosure
- Comply with 'safer recruitment' procedures and undertake Disclosure and Barring Checks, to ensure that all employees and workers under terms of engagement are suitable to work at the College
- Develop and implement procedures for identifying and reporting cases or suspected cases of abuse and make appropriate referrals to the Disclosure and Barring Service
- Ensure employers and other partners are aware of the safeguarding and Prevent duties and receive timely information and support to promote these duties to students in the workplace
- Educate and support all students in staying safe and being healthy
- Ensure that any child, young person or individual with additional needs who goes missing either from education, home or care home, particularly if this behaviour is repeated, is reported to the appropriate authority. All relevant staff are asked to complete registers timely and accurately and follow up unauthorised absences following the relevant College Attendance Strategy, policy and procedure
- Consult with students in developing safeguarding policies and procedures
- Encourage an atmosphere in which students find trained staff approachable to enable communication of any problems which may be putting them at risk

- Provide opportunities for children in need of additional support to identify themselves through the process of applications and enrolment. Students with identified support needs will be monitored through Student Support
- Provide appropriate mandatory training and development in accordance with the requirements of the Staff Development programme and induction. Raise awareness of all staff and governors of the need to safeguard children, young people and vulnerable adults and ensure they are aware of their responsibilities in identifying and reporting possible cases of abuse
- Provide environments where everyone feels valued, safe and respected. Where individuals are encouraged to talk and are listened to. This will be achieved by the regular promotion of the College values and embedding these together with British Values across every area of College activity
- Respond appropriately to all concerns, including those outside of college or online.

Note: Trainee Teachers are included when referring to all staff and volunteers and are subject to the same robust checks and training.

All Children who access the college from schools or Alternative Provision remain the responsibility of the schools.

*British values are defined as “democracy, the rule of the law, individual liberty and mutual respect and tolerance for those with different faiths and beliefs”.*

## **Safe Practice**

Bury College is fully compliant with the current Safe Practice guidance to be found in Bury Safeguarding Procedures at [www.Burysafeguardingchildren.co.uk](http://www.Burysafeguardingchildren.co.uk)

Safe working practice ensures that students are safe and that all staff:

- are responsible for their own actions and behaviour and should avoid any conduct which would lead any reasonable person to question their motivation and intentions
- work in an open and transparent way
- work with other colleagues where possible in situations open to question
- discuss and/or take advice from College management over any incident which may give rise to concern
- report any incidents following College safeguarding guidance processes
- apply the same professional standards regardless of gender, sexuality or disability
- comply and are aware of the confidentiality policy
- are aware that breaches of the law and other professional guidelines could result in criminal or disciplinary action being taken against them.

College staff having concerns about another member of staff:

- should report these concerns the Director of HR or Hr Representative,
- where staff members have concerns about the Principal, these will be reported to the Chair of Governors.
- where staff members have concerns about the Chair of Governors, these will be reported to the Principal and the Local Authority Designated Officer (LADO)

College staff having concerns about safeguarding practices:

- all staff and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in the College’s safeguarding processes and that such concerns will be taken seriously by the senior leadership team.
- appropriate whistleblowing procedures must be in place within the College and can be



read in further detail by accessing the College whistleblowing policy.

- where a staff member feels unable to raise an issue with their senior leadership or feel that their genuine concerns are not being addressed, other whistleblowing channels

may be open to them by accessing [www.gov.uk/whistleblowing](http://www.gov.uk/whistleblowing) or alternatively [www.gov.uk/government/news/home-office-launches-child-abuse-whistleblowing-helpline](http://www.gov.uk/government/news/home-office-launches-child-abuse-whistleblowing-helpline)

The ESFA has included safeguarding clauses in the funding agreements and contracts. Whilst the local authority and the institution have primary duties in respect of safeguarding, the Secretary of State (SoS) has a general duty to promote the wellbeing of children in England under section 7 of the Children and Young Persons Act 2008. ESFA's role therefore, is to provide assurance to the SoS, in meeting his/her general duty, that the correct organisations are taking action to keep all pupils and students safe. For this reason, they must be made aware when an institution is itself the subject of an investigation by the local authority or the police. They do not require details of all the safeguarding incidents an institution reports to the local authority or to the police, only where the institution itself, or one of its subcontractors, is subject to investigation. In such circumstances, they require the Chair or Chief Executive of the institution (or senior designated safeguarding lead) to email [Enquiries.EFA@education.gov.uk](mailto:Enquiries.EFA@education.gov.uk). ESFA will need to know the name of the institution, the nature of the incident and confirmation that it is, or is scheduled to be investigated by the local authority and/or the police.

The College will ensure that employers are aware of their safeguarding responsibilities and are clear on the contact details of The College safeguarding team. An employer handbook contains advice and guidance on safeguarding and prevent.

## **Definitions**

All staff at Bury College will have an understanding of Safeguarding and Prevent and their responsibilities through regular training and briefings. They will particularly develop knowledge in relation to safeguarding risks (appendix 4) and will have a clear understanding of procedures to follow (appendix 1). All staff and employers working with apprentices or students on work experience will be aware of the name and contact details for the Designated Safeguarding Lead, who is the expert within our College and is there to support staff, volunteers and the Governing Body further.

Safeguarding and promoting the welfare of children is defined for the purposes of this guidance as:

- protecting children from maltreatment;
- preventing impairment of children's mental and physical health or development;
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and
- taking action to enable all children to have the best outcomes.

Children includes everyone under the age of 18.

Frequently used acronyms which are commonly used within safeguarding and are referred to throughout this document:

- CAF – Common Assessment Framework (part of Early Help)
- CAMAT – Child Abuse Multi-Agency Training
- CAMHS - Child & Adolescent Mental Health Services
- CEOP - Child Exploitation and Online Protection centre (tackling child sex abuse and providing advice)
- CRB checks – Criminal Records Bureau checks (now called DBS checks)
- CSA - Child Sexual Abuse CSE – Child Sexual Exploitation (one aspect of CSA)
- DASH - Domestic Abuse, Stalking and Harassment and Honour-Based Violence

- (HBV). A risk identification, assessment and management model.
- DASV - Domestic Abuse and Sexual Violence
- DBS – Disclosure and Barring Service (DBS checks were previously known as CRB checks)
- DSL – Designated Safeguarding Lead. The member of staff that co-ordinates child safeguarding concerns and makes referrals (see also Named safeguarding staff, Level 3 training)
- DV – Domestic Violence
- Early Help – “providing support as soon as a problem emerges, at any point in a child’s life, from the foundation years through to the teenage years”. Essentially intervening to prevent abuse/neglect before it occurs.
- HBV - Honour-Based Violence
- HCPC – Health and Care Professions Council. An independent regulatory body responsible for setting and maintaining standards of training, performance and conduct of healthcare professions.
- ISA – Independent Safeguarding Authority
- LA - Local Authority
- LADO - Local Authority Designated Officer
- LSCB – Local Safeguarding Children Board
- MAAT - Multi-Agency Advice Team (within the MARU/Integrated Hub). Provides advice and consultation in cases where the LSCB threshold for statutory social work intervention is not met.
- MACP – Multi-Agency Child Protection
- MARAC - Multi-Agency Risk Assessment Conference
- MARU – Multi-Agency Referral Unit
- SCR - Serious Case Review
- Section 17 – Section of the Children Act 1989 which gives Local Authorities a general duty to safeguard and promote the welfare of children within their area who are In Need
- Section 47 – Section of the Children Act 1989 which places a duty on Local Authorities to make enquiries into the circumstances of children considered to be at risk of significant harm and, where these inquiries indicate the need, to decide what action, if any, it may need to take to safeguard and promote the child’s welfare
- Section 47 Enquiry – if a child is taken into police protection, is the subject of an Emergency Protection order or there are reasonable grounds to suspect that a child is suffering or is likely to suffer significant harm, a Section 47 Enquiry is initiated
- TAC – Team Around a Child (part of Early Help)
- TAF – Team Around the Family (part of Early Help)

### **Safeguarding concerns**

Appendix 4 provides an overview of the types of safeguarding risks that young people face. This is not an exhaustive list. All staff should refer students to the safeguarding team if they have any concerns or require further advice without delay. This covers:

- Abuse
- Bullying, including cyberbullying
- Children & Young People Missing in Education
- Child sexual exploitation (CSE)
- Domestic abuse
- Drugs
- Equality Act
- Fabricated or induced illness
- Faith abuse

- Female genital mutilation (FGM)
- Forced marriage
- Gangs and youth violence
- Homelessness
- Human Rights
- Intra Familiar Harms
- Mental health
- Missing from home
- LGBTQ
- Online safety
- Online Hoax's and Challenges
- Child on child abuse
- Private fostering
- Preventing radicalisation
- Public Sector Duty
- Sexual violence and sexual harassment Child on Child
- Sexting
- Trafficking
- Upskirting
- Victims and perpetrators
- Youth Produced Sexual Imagery
- Looked after and previously looked after Children

### **Support Locations**

Safeguarding, Counselling, Mental Health and Pastoral support is available in the Millennium building and is accessible to all students at Bury College. Support can be accessed via the student services team, pastoral teams and reception teams on any campus.

## **SECTION B**

### **3 Responsibilities**

Governing bodies and proprietors should facilitate a whole college approach to safeguarding. This means ensuring safeguarding and child protection are at the forefront and underpin all relevant aspects of process, policy and development. Ultimately all systems process and policies should operate with the best interests of the child at their heart. Where there is a safeguarding concern, governing bodies, proprietors and college leaders should ensure the child's wishes and feelings are considered when determining what action to take and services to provide. Systems should be in place, they should be well promoted, easily understood, easily accessible or children to confidently report abuse and their concerns will be taken seriously.

#### **3.1 Governing Body responsibilities**

The Governing Body will ensure that the College:

- Has a whole college approach to safeguarding
- Has in place an effective Safeguarding Policy and Procedure in-keeping with locally agreed interagency procedures and makes the Policy available to parents/students or other users on request
- Has processes in place to ensure that all staff undertake regular effective safeguarding training that includes online safety
- Has appropriate provision to ensure that children and young people are taught about safeguarding, including online safety. This provision should include a personalised or contextualised approach for vulnerable children, victims of abuse or SEND children
- Operates safe recruitment procedures and makes sure that all appropriate checks are carried out on new staff and volunteers who will work with children and vulnerable adults, including DBS checks.
- Has procedures for dealing with allegations of abuse against members of staff and volunteers
- Has a member of the College Leadership Team who is designated to take lead responsibility for dealing with safeguarding issues, providing advice and support to other staff and liaising with local agencies.
- Ensures the designated person undertakes training that is up to the standards agreed by the LSCB and refresher training at 2 yearly intervals.
- Remedies any deficiencies or weaknesses in regard to safeguarding arrangements that are brought to its attention without delay.

There is a designated governor link for safeguarding. It is their responsibility to liaise with the local authority and/or partner agencies on issues of child protection and where allegations of abuse are made against The Principal. The designated Governor is responsible for liaising with the Principal and Senior Staff Member with Lead Responsibility over matters regarding safeguarding, including:

- Ensuring that the College has procedures and policies which are consistent with the Local Safeguarding Children Board's procedures.

- Ensuring all relevant policies and procedures include reference to safeguarding / Prevent.
- Ensuring that the Governing body considers College safeguarding and Prevent a priority.
- Ensuring that each year the Governing body is informed of how the College and its staff have complied with the policy, including but not limited to a report on the training that staff have undertaken.
- The governors have an established Safeguarding Working Group which meets on a termly basis to receive reports and updates on legal responsibilities and ensure that the Local Authority procedures are being followed appropriately.
- The governors must wear ID Badges when visiting the College.

### **3.2 The responsibilities of the Principal**

- The Principal and Chief Executive will ensure that:
- There is a whole college approach to safeguarding and understanding that **'it can happen here'**.
- The Policies and Procedures adopted by the Governing Body are fully implemented and followed by staff.
- The DSL is a member of the College Leadership Team who is designated to take lead responsibility for dealing with safeguarding issues, providing advice and support to other staff and liaising with local agencies.
- Sufficient resources and time are allocated to enable the designated member of staff and others to discharge their responsibilities including taking part in strategy decisions and other inter-agency meetings.
- All staff and volunteers feel able to raise concerns about poor or unsafe practice in regard to children, young people and vulnerable adults and such concerns are addressed sensitively and effectively in a timely manner.
- Has appropriate provision to ensure that children and young people are taught about safeguarding, including online safety. This provision should include a personalised or contextualised approach for vulnerable children, victims of abuse or SEND children

### **3.3 Management responsibilities**

#### **Assistant Principal Personal Development and Designated Safeguarding Lead**

- Will ensure dissemination and implementation of the policy
- Will take lead responsibility for safeguarding and child protection (including online safety and ensuring that filtering and monitoring process and procedures are in place and reviewed at least annually.
- Will make decisions to block and remove access to websites that may pose a risk to children or vulnerable adults
- Will ensure that the College communicates with parents to provide them information in relation to online safety, cyber security and other relevant safeguarding topic and themes
- Will be the Designated Safeguarding Lead for the College with a day to day responsibility for supporting and supervising the Safeguarding and Prevent Manager
- Will be the Designated Teacher for Looked after and previously Looked After Children
- Will act as the Designated Safeguarding Lead for Students with SEND, High Needs and EHCP

- Will be the Senior Mental Health Lead for the College
- Will ensure the development of cross College training to ensure that governors, staff and visitors are fully aware of the safeguarding issues faced by children, young people and vulnerable adults and how to keep them safe
- Will provide advice and support to staff on child welfare and child protection matters. He/she will take part in strategy discussions and inter agency meetings and ensure strategies and policies are agreed, implemented and effectively delivered.
- Will refer to LADO as appropriate.
- Will report at least termly to the Board of Governors regarding the appropriate policies and procedures and will provide a statistical analysis of safeguarding incidents and all training and related CPD undertaken.
- Will report weekly to the Leadership Team on matters arising around safeguarding
- Will report immediately to the Principal any safeguarding issues that impact on the wider College
- Will keep up to date with nationwide threat and issues arising in the community
- Will be available and contactable through periods of partial College closure
- Will monitor the overall attendance of vulnerable students through a period of partial College closure
- Will ensure that the tutorial framework includes opportunities to develop skills, knowledge and behaviours to enable students to keep themselves safe
- Will ensure that assault and apprentices have appropriate resources to ensure they know how to keep themselves safe from radicalisation, including equality and diversity, online safety, mental health and well-being. These resources will be adapted and include relevant considerations to the student's location.
- Will ensure that the tutorial framework includes opportunities to develop skills, knowledge and behaviours in regards to upholding British Values and awareness around Prevent for all types of students including adults and apprentices
- Will lead on the Mental Health and Wellbeing Strategy across the College
- Will ensure that the tutorial provision provides opportunities for students to develop an understanding and awareness around consent, online safety, sexual violence, sexual harassment, healthy relationships, EDI and prevent. Supporting students to develop and become well rounded, well prepared young people ready for life and work in modern Britain.
- Will ensure to provide enrichment and extracurricular activities to promote a zero-tolerance culture around sexual violence, sexual harassment, racism, bullying and harassment, supporting students to develop and become well rounded, well prepared young people ready for life and work in modern Britain.

#### **Vice Principal Finance and Corporate Resources**

- Will ensure that safeguarding requirements are included in any transfer of control agreement as a condition of occupation of the premises and that failure to comply would lead to termination of the agreement.

#### **Director of HR**

- Be the first point of contact in regards to allegations against staff
- Be responsible for safer recruitment

#### **Safeguarding & Prevent Manager**

- Will be the initial point of contact for referrals and concerns related to radicalisation and extremism and will be available at all times during term time/college hours. Where this is not possible, effective cover arrangements must be in place
- Will be the Deputy DSL with day to day responsibility for the safeguarding of students including Looked After and Previously Looked after students
- Will provide support for staff in relation to Prevent

- Will contribute to, and regularly review, the Prevent Risk Assessment
- Will organise training for staff and students
- Will meet with Pastoral Managers to discuss referrals and agree actions
- Will be available and contactable through periods of partial College closure
- Will monitor the attendance of vulnerable students through a period partial College closure
- Will ensure that resources are available to signpost students in their communities
- Will ensure staff complete mandatory training and provide proof as required
- Will ensure that the filtering and monitoring system is observed and actioned on a day to day basis.
- Will ensure the deployment of appropriate support for students in regards to mental health and wellbeing
- Will ensure that all referrals and concerns raised in regards to safeguarding are dealt within 24 hours
- Will ensure that all students with SEND that are referred to safeguarding have additional support in regards to their communication needs

#### **Head of IT Services**

- Will ensure that the college filtering and monitoring systems are effective and
- Up to date inline with current need
- Will conduct monthly tests with Safeguarding and Prevent manager to ensure that current themes and safeguarding concerns are blocked.
- Ensure that every device is protected with an appropriate firewall.

#### **Head of Learning Support**

- Will be part of the safeguarding team and ensure that students with SEND or communication barriers are supported where there are any referrals to learning support
- Support in the development of topic-based tutorial materials that support students with SEND and are flexible to meet needs

#### **Curriculum Directors/ Assistant Directors/ Assistant Principals**

- Will ensure staff are aware of, and follow, policies and procedures
- Will provide approval for guest speaker forms
- Will ensure staff attend training
- Will ensure the safety measures and process are followed and in place for external trips and visits
- Will ensure safety measures and process are followed for external work experience
- Will ensure that teachers communicate to parents and carers the websites and topics that their young people will be accessing or researching.

#### **Pastoral Managers**

- Will Risk assessing students with criminal convictions prior to starting programmes
- Will support the Safeguarding & Prevent Manager in dealing with Safeguarding issues.
- Will take responsibility for dealing with safeguarding issues relating to students as they arise
- Will refer safeguarding concerns to the appropriate agencies
- Will provide advice and support to staff dealing with a safeguarding concern relating to students



- Will attend external meetings as appropriate
- Will liaise with schools, children's services, the police and other agencies as required
- Will maintain accurate records of safeguarding issues and subsequent actions
- Will be available and contactable through periods of partial College closure
- Will monitor the attendance of vulnerable and all students through any period of partial College closure
- Will ensure that all students with SEND that are referred to safeguarding have additional support in regards to their communication needs
- Will ensure that all referrals and concerns raised in regards to safeguarding are dealt within 24 hours

### **3.4 All College Staff**

All college staff play an important role in safeguarding as they are in a position to identify concerns early, providing help for children and young people to prevent concerns from escalating.

- **All Staff should ensure that they have read part 1 of KCSIE**
- Any member of staff who has a concern should follow the referral process as set out by the College.
- All staff must wear their ID badges at all times
- Promote a zero-tolerance culture in regards to sexual violence and sexual harassment
- Ensure that all concerns in relation to sexual harassment are treated seriously
- All staff must challenge any form of derogatory and sexualised language or behaviours, Taking a zero-tolerance approach to inappropriate behaviour
- All College staff have the responsibility to provide a safe environment in which they can learn
- All College staff have the responsibility of being vigilant in observing, identifying and reporting concerns
- All staff should ensure that they refer in concerns about a student's mental health and wellbeing
- All new staff will undertake an induction to ensure they are fully apprised of current safeguarding policy and procedures.
- All College staff will undertake an appropriate level of training to raise awareness and highlight key issues. This training will take place as a minimum every year via briefings and e-learning packages.
- All College staff have the responsibility to adhere to the staff code of conduct and to behave in a professional manner that safeguards children and themselves.
- All staff will not access the personal details of any student within the College without prior permission from the DSL
- All staff have the responsibility to follow the procedure for sending students home in Appendix 2
- All staff have a duty to report through the safeguarding processes, any concerns that may arise through observing students in the work place or conversation with students that present a safeguarding concern in external organisations. For example, if a concern arises around the practices at a workplace that give rise to concerns about a

patient or clients.

- All staff have a duty to report through the College disciplinary process and safeguarding process any concerns that a learner behaviour puts into question the professional standards and responsibility of the qualification they are studying. All staff should be familiar with the expectations around professional conduct for students in line with awarding body requirements. The student handbook should ensure that students are aware of the professional conduct required within their qualification and their chosen profession. An incident would be addressed through the disciplinary process.
- During a period of distance learning, College staff should make requests to the Principal to undertake any live sessions that contain video imagery.
- Any online conferencing or audio conferencing must be requested through the DSL and a risk assessment completed and approved.
- Staff must only use technology that has been approved by the College Leadership Team
- Teachers should use Appendix 8 guidance when asking students to research sensitive topics, such as safeguarding, terrorism and counter terrorism. Teachers must also inform parents, in line with online safety of the topics and websites that students maybe using to conduct research.

### **3.5 Student responsibilities**

Student responsibilities are clearly set out in the student code of conduct that is explained, agreed and signed at the start of their learning programme.

- Seek support and ask for help if they need it or a peer needs it
- Visible ID Badge at all times on College premises
- Abide by the online safety policy and acceptable user policy for IT
- Abide by the student contracts
- Abide by the zero tolerance to sexual violence and sexual harassment
- Report any concerns they have around sexual violence or harassment
- Contact the safeguarding team if they feel unsafe at home or at College
- Report any concerns they have about other student's safety
- Report any concerns they have around upholding British Values and Prevent
- Be aware of their own safety and the safety of others
- Complete all tutorial activities that promote awareness of safety
- Inform the College if they have a diagnosed learning difficulty or disability
- Seek support for help with mental health issues.

### **3.6 Multi-agency working**

Schools and colleges have a pivotal role to play in multi-agency safeguarding arrangements. Governing bodies and proprietors should ensure that the school or college contributes to multi-agency working in line with statutory guidance Working Together to Safeguard Children.

New safeguarding partners and child death review partner arrangements are now in place. Locally, the three safeguarding partners (the local authority; a clinical commissioning group for an area within the local authority; and the chief officer of police for an area (any part of which falls) within the local authority area) will decide to work together with appropriate relevant agencies to safeguard and promote the welfare of local children, including identifying and responding to their needs.

It is especially important that schools and colleges understand their role in the three safeguarding partner arrangements. Governing bodies, proprietors and their senior leadership teams, especially their designated safeguarding leads, should make themselves aware of and follow their local arrangements.

The three safeguarding partners have a shared and equal duty to work together to safeguard and promote the welfare of children. To fulfil this role, they must set out how they will work together and with any relevant agencies.

Relevant agencies are those organisations and agencies whose involvement that the three safeguarding partners consider may be required to safeguard and promote the welfare of children with regard to local need.

The three safeguarding partners will have set out in their published arrangements which organisations and agencies they will be working with and the expectations placed on any agencies and organisations by the arrangements. Bury's partnership details can be found here:

<https://burysafeguardingpartnership.bury.gov.uk/CHttpHandler.ashx?id=20167&p=0>

The three safeguarding partners should make arrangements to allow all schools (including those in multi-academy trusts) and colleges in the local area to be fully engaged, involved and included in safeguarding arrangements. It is expected that, locally, the three

safeguarding partners will name schools and colleges as relevant agencies and will reach their own conclusions on the best way to achieve the active engagement with individual institutions in a meaningful way.

If named as a relevant agency, schools and colleges, in the same way as other relevant agencies, are under a statutory duty to co-operate with the published arrangements.

Governing bodies and proprietors should understand the local criteria for action and the local protocol for assessment and ensure they are reflected in their own policies and procedures. They should also be prepared to supply information as requested by the three safeguarding partners

Schools and colleges should work with social care, the police, health services and other services to promote the welfare of children and protect them from harm. This includes providing a coordinated offer of early help when additional needs of children are identified and contributing to inter-agency plans to provide additional support to children subject to child protection plans. All schools and colleges should allow access for children's social care from the host local authority and, where appropriate, from a placing local authority, for that authority to conduct, or to consider whether to conduct, a section 17 or a section 47 assessment.

## SECTION C

### 4 Dealing with disclosure or abuse: Safeguarding Referral Process (Appendix 1)

In the event of any partial College closure, the DSL will be contactable via telephone and staff should not hesitate to refer in safeguarding concerns. The process below should still be followed.

All staff should be aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. For example, children may feel embarrassed, humiliated, or being threatened. This could be due to their vulnerability, disability and/or sexual orientation or language barriers. This should not prevent staff from having a professional curiosity and speaking to the DSL if they have concerns about a child. It is also important that staff determine how best to build trusted relationships with children and young people which facilitate communication.

All staff that have concerns should follow the College's safeguarding referral process

In the event that a student or someone discloses that a child or young person is at risk, all staff members:

- Must listen and take detailed notes,
- Should not interrogate or ask leading questions
- Must explain your duty of care to report all cases where abuse is suspected to be taking place.
- Must not promise confidentiality
- All disclosures of anything relating to a breach of human rights, the equality act need to be referred to safeguarding. This will also be followed up through the disciplinary process.

Staff should immediately inform the College's safeguarding team.

It is essential that this information is recorded and detailed carefully on CPOM's straight away. This information should not be shared within anyone other than the safeguarding team. You must include

- A clear comprehensive summary of the concern
- Details of how the concern was followed up and resolved
- A note of any action taken, decision reached and the outcome

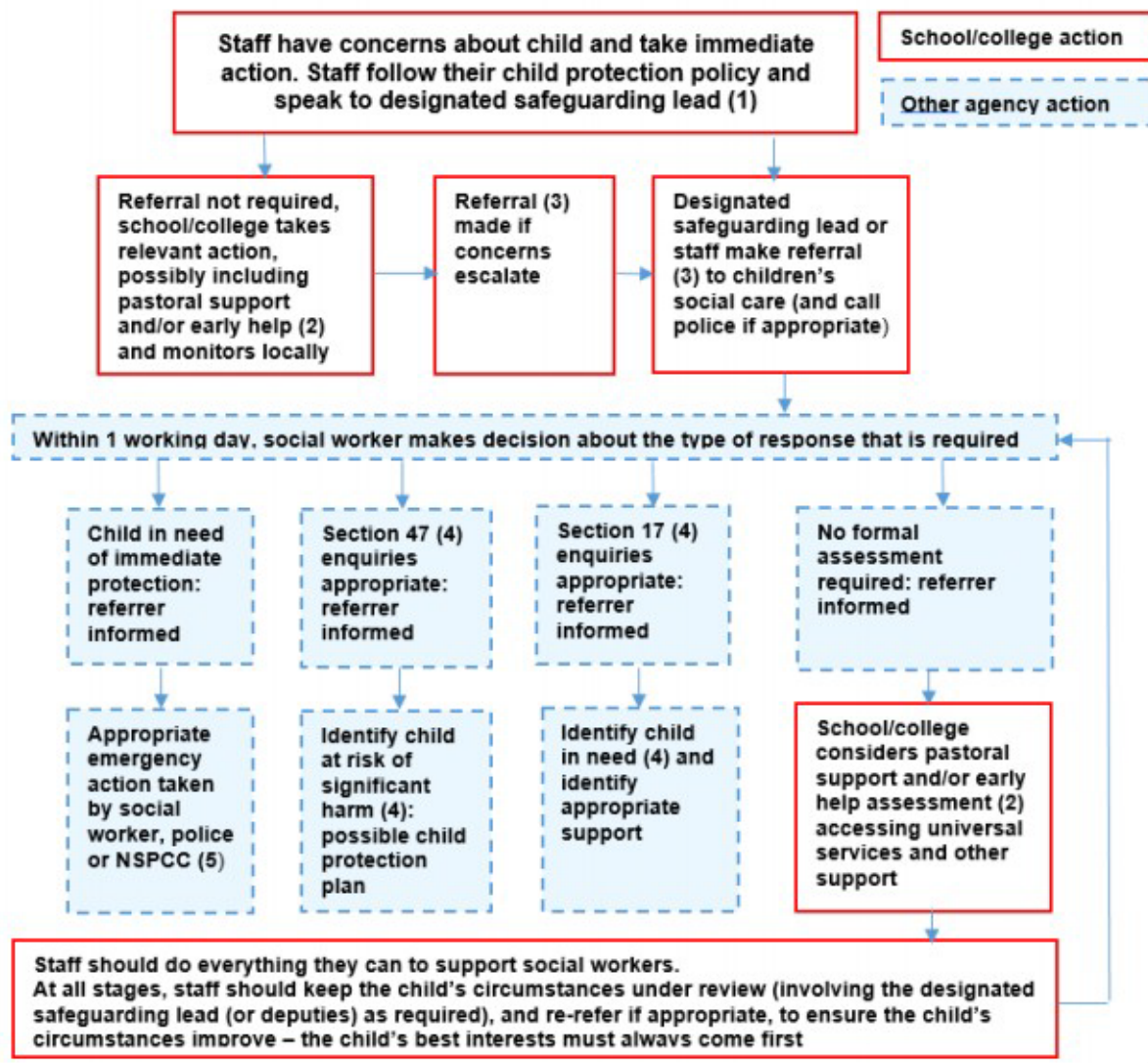
**If the issue is urgent, the student is at immediate risk of harm or injury or staff are unsure, the safeguarding team should be contacted in person, by telephone 07713312773 or [Safeguarding@buryCollege.ac.uk](mailto:Safeguarding@buryCollege.ac.uk)**

For non-urgent safeguarding issues, detailed information should be detailed carefully and recording on CPOM'S

The Appendix when to contact the police should be used alongside the behaviour and disciplinary policy to ensure appropriate referrals are made.

**The safeguarding team will follow the flow chart below when dealing with safeguarding concerns:**

## Actions where there are concerns about a child



## SECTION D

### 5.1 Dealing with allegations against members of staff

The framework for managing cases is set out in the College Managing Allegations of Abuse against staff policy includes the KCSIE guidance on low level concerns. This applies to a wider range of allegations for those in which there is reasonable cause to believe a child is suffering, or is likely to suffer, significant harm.

It also caters for cases of allegations that might indicate that s/he is unsuitable to continue to work with children in their present position, or in any capacity. It should be used in respect of all cases in which it is alleged that a person who works with children has:

- behaved in a way that has harmed a child, or may have harmed a child;
- possibly committed a criminal offence against or related to a child;
- behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children; or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children.

The last bullet point above includes behaviour that may have happened outside of college, that might make an individual unsuitable to work with children, this is known as transferable risk. Where appropriate an assessment of transferable risk to children with whom the person works should be undertaken. If in doubt the college will seek advice from the local authority designated officer (LADO).

There may be up to 3 strands in the consideration of an allegation: -

- Police investigation of a possible criminal offence;
- Enquiries and assessment by Children's Services about whether a child needs protection or is in need of services; and/or
- Consideration by the employer of disciplinary action in respect of the individual if there is a breach of professional standards/code of conduct.

This part of the guidance relates to members of staff, agency workers and volunteers who are currently working in any school or college regardless of whether the school or college is where the alleged abuse took place. Allegations against a teacher who is no longer teaching should be referred to the police. Historical allegations of abuse should also be referred to the police.

The College as an employer has a duty of care towards its employees. The College should ensure it provides effective support for anyone facing an allegation and provide them with a named contact if they are suspended. Where the school or college are not the employer of an individual they still have responsibility to ensure allegations are dealt with appropriately and that they liaise with relevant parties (this includes agency workers and volunteers, see paragraphs on supply teachers below). It is essential that any allegation of abuse made against a teacher or other member of staff or volunteer in a school or college is dealt with very quickly, in a fair and consistent way that provides effective protection for the child and, at the same time supports the person who is the subject of the allegation.

The College has identified that the Director of HR, Student & Customer Services and the Director of Personal Development (DSL) as the key staff to whom allegations or concerns that a member of staff or volunteer may have abused a child or failed in their safeguarding duty should be reported. Or in cases where that person is the subject of the allegation or concern,

the concern should be reported to the named L.A.D.O(Local Authority Designated Officer) within the Children's Services Department. All concerns should follow the flowchart in Appendix 2. For further guidance please refer to the Allegations of Abuse made against staff policy.

In the case of an allegation against an agency member of staff. Agencies should be fully involved and co-operate with any enquiries from the LADO, police and/or local authority children's social care. The college will usually take the lead because agencies do not have direct access to children or other school or college staff, so they will not be able to collect the facts when an allegation is made, nor do they have all the relevant information required by the LADO as part of the referral process. Supply teachers, whilst not employed by the school or college, are under the supervision, direction and control of the governing body when working in college. They should be advised to contact their trade union representative if they have one, or a colleague for support. The allegations management meeting which is often arranged by the LADO should address issues such as information sharing, to ensure that any previous concerns or allegations known to the agency or agencies are considered by the school or college during the investigation.

Suspension should not be an automatic response when an allegation is reported. All options to avoid suspension should be considered prior to taking that step. The case manager must consider carefully whether the circumstances warrant suspension from contact with children at the school or college, until the allegation is resolved. It should be considered only in cases where there is cause to suspect a child or other children at the college is/are at risk of harm, or the case is so serious that there might be grounds for dismissal. If in doubt, the case manager should seek views from their personnel adviser and the LADO, as well as the police and local authority children's social care where they have been involved. A member of the Senior Leadership Team would make the final decision on suspension.

Throughout the process in handling allegations and at conclusion of a case in which an allegation is substantiated, the LADO should review the circumstances of the case with the case manager to determine whether there are any improvements to be made to the school's or college's procedures to help prevent similar events in the future. This should include issues arising from any decision to suspend the member of staff, the duration of the suspension and whether or not suspension was justified. Lessons should also be learnt from the use of suspension when the individual is subsequently reinstated. The LADO and case manager should consider how future investigations of a similar nature could be carried out without suspending the individual

For all other cases, where the allegation concluded to be either, unfounded, false, malicious or unsubstantiated the case manager (and if they have been involved the LADO) should consider the facts and determine whether any lessons can be learned and if improvements can be made.

### **Low level concerns**

As part of their whole college approach to safeguarding, the college will ensure that they promote an open and transparent culture in which all concerns about all adults working in or on behalf of the college (including supply teachers, volunteers and contractors) are dealt with promptly and appropriately.



The term 'low-level' concern does not mean that it is insignificant. A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' - that an adult working in or on behalf of the school or college may have acted in a way that:

- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work and
- does not meet the harm threshold or is otherwise not serious enough to consider a referral to the LADO.

Examples of such behaviour could include, but are not limited to:

- being over friendly with children
- having favourites
- taking photographs of children on their mobile phone, contrary to school policy
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door
- humiliating pupils

Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate, but might not be in specific circumstances, through to that which is ultimately intended to enable abuse

Low-level concerns may arise in several ways and from a number of sources. For example: suspicion; complaint; or disclosure made by a child, parent or other adult within or outside of the organisation; or as a result of vetting checks undertaken.

It is crucial that all low-level concerns are shared with **Director for HR immediately and the Assistant Principal for personal Development** and in line with any other concerns. Ensuring they are dealt with effectively should also protect those working in or on behalf of schools and colleges from becoming the subject of potential false low-level concerns or misunderstandings.

Low-level concerns which are shared about supply staff and contractors will be shared with their employers by HR, so that any potential patterns of inappropriate behaviour can be identified.

All concerns in relation to staff members will be logged confidentially on CPOM's staff safe.

Where an allegation is made relating to an incident that happened when an individual or organisation was using the college premises for purpose of running activities for children, the college will follow the internal safeguarding procedures, including informing the LADO

## **5.2 Staff Training and Induction**

The College's Designated Safeguarding Lead (DSL) with responsibility for child protection, undertakes appropriate child safeguarding training and inter-agency working training (provided the local Safeguarding Children Board).

The DSL(s) and Pastoral Managers will undergo training to provide them with the knowledge and skills required to carry out the role. The training should be updated every two years.

In addition to their formal training, their knowledge and skills will be updated (for example, via e- bulletins, meeting other DSLs, or taking time to read and digest safeguarding developments), at regular intervals, but at least annually, to keep up with any developments relevant to their role.

All other College staff, including non-teaching staff, will receive appropriate safeguarding and child protection training which is regularly updated.

In addition, all staff members will receive safeguarding and child protection updates (for example, via e-mail, e-bulletins and staff meetings), as required, but at least annually, to provide them with relevant skills and knowledge to safeguard children effectively.

All new staff (including agency staff and volunteers) are provided with the College's Safeguarding Policy and informed of College's Child Protection arrangements at Induction.

Governors receive appropriate safeguarding and child protection (including online) training at induction. This training should equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place in schools and colleges are effective and support the delivery of a robust whole college approach to safeguarding. Training will be provided annually. Annual staff training and induction will include:

- Ensuring the staff are aware of the Safeguarding and prevent policy which includes procedures on how to deal with Child-on-Child abuse
- Ensuring staff are aware of the Behaviour and Pastoral policy which includes measures to prevent bullying, cyberbullying, prejudice-based and discriminatory bullying against staff, visitors and students
- Ensure that staff are aware of their responsibility to inform parents of the topics that students might be searching for online, as part of their programme of study
- The staff Code of conduct
- The response to students who are absent from education, particularly on repeat occasions and/ or prolonged periods
- The Role of the Designated Safeguarding Lead, Safeguarding Manager, Pastoral Managers and other safeguarding team members
- KCSIE Part One
- All Leadership, Governors, Pastoral and Safeguarding staff to read all of KCSIE annually.

### **5.3 Safer Recruitment and Selection (please download guidance on DBS, Vetting and Barring)**

Bury College pays full regard to DfE guidance 'Keeping Children Safe in Education' (2023).

The College will ensure that all appropriate measures are applied in relation to everyone who works in the College who is likely to be perceived by the student as a safe and trustworthy adult, including volunteers and staff employed by contractors. Safer recruitment practice includes scrutinising applicants, verifying identity, academic and vocational qualifications, obtaining professional references, checking previous employment history, online searches and ensuring that a candidate has the health and physical capacity for the job. It also includes undertaking interviews and checking the candidate's DBS status, the Children's List, DBS checks and right to work in England checks. Applicants will be informed that an online

search will be conducted.

In line with statutory changes, underpinned by regulations, the College will maintain a Single Central Record (SCR). This document will cover the following people:

- all staff, including agency staff, and those providing education to children.

The information that must be recorded in respect of all staff members mentioned above is whether the following checks have been carried out or certificates obtained, **and** the date on which each check was completed/certificate obtained apply:

- an identity check;
- a barred list check;
- an enhanced Disclosure and Barring Service (DBS) check
- a prohibition from teaching check;
- a section 128 check (for management positions as set out in paragraph 99 for independent schools, including free schools and academies);
- further checks on people who have lived or worked outside the UK: this would include recording checks for those European Economic Area (EEA) teacher sanctions and restrictions;
- a check of professional qualifications; and
- a check to establish the person's right to work in the United Kingdom.

For supply/agency staff, the College will include whether written confirmation that the employment business supplying the member of supply staff has carried out the relevant checks and obtained the appropriate certificates, whether any enhanced DBS check certificate has been provided in respect of the member of supply staff and the date that confirmation was received.

Where the agency or organisation has obtained an enhanced DBS certificate before the person is due to begin work at the college, which has disclosed any matter or information, or any information was provided to the college, the college must obtain a copy of the certificate from the agency.

The college will work with sub-contractors to ensure that they have a SCR in place for all staff working with students in the subcontracted provision.

Where checks are carried out on volunteers, the College will record this on the single central record.

Under no circumstances will a volunteer in respect of whom no checks have been obtained be left unsupervised or allowed to work in regulated activity with a person under 18.

#### **5.4 Health and Wellbeing Support for Staff**

Support is available for staff via HR where incidents have occurred with students where they feel victimised or unsafe. Where a staff member is the victim of a student assault this should be reported to HR to ensure the staff member is supported. Further guidance on this is available in the student disciplinary policy.

#### **5.5 Use of College premises for non-college activities.**

Where the college hire or rent out college premises to individuals and organisations the college will ensure that appropriate safeguarding arrangements are in place to keep children safe. The College will seek assurance that the provider concerned has appropriate safeguarding and child protection policies and procedures in place (including inspecting these as needed); and ensure that

there are arrangements in place for the provider to liaise with the college on these matters where appropriate. This applies regardless of whether or not the children who attend any of these services or activities are children on the school roll or attend the college. The College will ensure safeguarding requirements are included in any transfer of control agreement (i.e. lease or hire agreement), as a condition of use and occupation of the premises; and that failure to comply with this would lead to termination of the agreement.

## **SECTION E – ADDITIONAL ARRANGEMENTS**

### **6.1 Missing in education**

The College has a responsibility to ensure that all staff are aware that children and young people going missing, particularly repeatedly, can act as a vital warning sign for a range of safeguarding possibilities. Early intervention is necessary to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child going missing in future. Staff should be aware of and follow the College 'unauthorised absence' and 'children missing from education' procedures.

Where a student has not attended College for a week and tutors have not been able to make contact, this should be referred as a safeguarding concern using CPOM's. Where a student is a Care Leaver, a Looked after Child/ previously Looked After Child or is supported by the safeguarding team, a referral should be made to safeguarding on the same day. If the safeguarding team are unable to make contact via, phone, text, email or letter, a home visit will take place the following week or sooner if appropriate. Home visits will always be conducted by the 10<sup>th</sup> day, or earlier if the student is under safeguarding support or deemed an immediate risk. Pastoral Managers will monitor student's attendance through weekly At-Risk meetings and will be alert to attendance patterns, these students will be referred to safeguarding for further investigation.

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

**This should include a consideration of holiday requests within term time. Any requests for holidays should be approved by the Head of Curriculum.**

### **6.2 Residential, Trips and Visits**

Any staff who support students on residential or during day trips should ensure appropriate forms are completed, approved and logged with the College before commencement of the event and in accordance with College established procedures. In each case it is required that all staff or volunteers included must be DBS checked. It is essential that all staff must be made aware of safeguarding procedures and be in contact with the College named person during the event.

### **6.3 Student DBS Checks and Disclosure by Association**

DBS checks are carried out on students who complete work experience with children or vulnerable adults. Students completing work experience with children under the age of 8 are also required to complete a disclosure by association. The DBS is logged by the counter signatory but remains the property of the student. Any convictions appearing on a DBS or any issues identified through disclosure by association are dealt with by the relevant Curriculum Director. The nature of any conviction will be considered and appropriate controls put in place.

## **6.4 Recruitment of Students with a Criminal Record**

Students who disclose that they have a criminal record, or if this subsequently comes to light, will be interviewed by the Pastoral Manager with responsibility for that programme. The nature of the conviction will be considered and a risk assessment produced. This will identify appropriate control measures and be held and monitored by the Pastoral Manager. Should the student change courses or be required to attend classes on a different site the Pastoral Manager completing the risk assessment will share the control measures with other Pastoral Managers who will now have responsibility for this student. If it is not possible to provide learning for an individual due to the nature of their conviction, the reason will be explained.

Declaring a criminal conviction does not automatically prevent anyone from becoming or continuing as a student at Bury College and we offer appropriate support when necessary. However, if a risk assessment is identified as 'high risk' then admission to College will be refused. Applicants assessed as 'medium risk' will be robustly monitored in partnership with appropriate external agencies.

The College is committed to ensuring that students are aware of behaviour towards them that is not acceptable and how they can keep themselves safe.

All students will know that we have a Designated Safeguarding Lead (DSL) and Pastoral Managers with responsibility for child protection.

The College's tutorial programme, strongly promotes key messages relating to all aspects of safeguarding during induction and throughout the academic year.

The College reserves the right to refuse a place to an applicant if s/he is assessed as a high risk to themselves or others, or if the College is unable to ensure a safe environment for the College community if the applicant is admitted. We will also undertake risk assessments if information is received at any time which suggests that the student may present a risk to themselves or others. This will include referrals from external agencies relating to criminal activity, organised gang crime (weapons, drugs) or serious gang affiliation. Any student who is clearly evidenced to be involved with serious criminal and / or violent activity will be withdrawn from their course.

## **6.5 Student Support**

All students are made aware throughout induction, tutorial and College promotions of how to keep themselves safe. This includes training and support around, Health and wellbeing, British Values, Prevent, online safety and awareness raising of common themes and risks to students. Students training and awareness is a key priority at Bury College and is reinforced throughout their whole learner journey. The tutorial framework is sequenced in a way that allows students to develop skills knowledge and behaviours over time to keep themselves safe. Students are made aware of what to do should they not feel safe. For apprentices, key topics are selected and personalised to deliver to individual students. Adult students receive adapted news letter to provide information on key topics.

## **Welfare and Pastoral**

To support students of all faiths including those with none, the College has a number of measures in place. A contemplation room is provided for students that is monitored by the College. There are rules of respect around the use of the contemplation room to ensure that students that require a quiet place of reflection have the opportunity to do so. As well as this resource students have access to:

- The Safeguarding Team
- Pastoral Team
- Behaviour Team
- Counselling Service

## Mental Health and Wellbeing

Students mental health and wellbeing does not mean an absence of physical or mental illness. Rather it is a state of physical, mental and emotional health where a student is able to engage meaningfully in learning and contribute to their community. Wellbeing is personal and multifactorial, but typically includes feelings of being socially connected, a sense of direction and belonging, satisfaction with personal achievements, and low levels of anxiety. To ensure that. The College support mental health and wellbeing through:

- Mental Health and Wellbeing Steering group
- A dedicated Mental Health and Wellbeing Strategy that highlights the Colleges responsibility and individuals in supporting mental health
- The Thrive model to provide early intervention and support for students
- Centralised resources available on the VLE
- Inclusion and embedded within the tutorial model
- Training for staff on the thrive model
- A dedicated team including, safeguarding, behaviour, pastoral and counselling

All staff must be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect and exploitation.

Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.

Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children's experiences, can impact on their mental health, behaviour and education.

If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following this policy and speaking to the designated safeguarding lead or a deputy.

### 6.6 On-Line Safety

The use of technology has become a significant component of many safeguarding issues. The internet can be a fantastic place for children and young people where they can talk to friends, be creative and have fun. However, the college is committed to managing the risks associated with the use of technology.

Working with our students we have a tutorial entitlement that develops skills, knowledge and behaviours in identifying and avoiding risk, learning how best to protect themselves and their friends, and knowing how to get support and report abuse if they do encounter difficulties.

IT filters and monitoring systems are in place and these are regulated and risk assessed as part of the Prevent duty. An **Online Safety Policy** identifies the usage and expected behaviour of staff and students. As a College of further education, we appreciate the value of technology



and that appropriate filters are in place yet this does not lead to unreasonable restrictions which would limit online teaching.

The College will provide support, guidance and advice to children, young people, vulnerable and adults, parents and guardians on how to keep safe online. Those taking part in online or distance learning will have the same access to the safeguarding team to report any concerns. Concerns should be reported through [safeguarding@buryCollege.ac.uk](mailto:safeguarding@buryCollege.ac.uk)

Through a period of online or distance learning it essential that staff have regular contact with students to ensure that they are still looking out for signs that they may be at risk.

The breadth of issues classified within online safety is considerable, but can be categorised into three areas of risk:

- content: being exposed to illegal, inappropriate or harmful material; for example, pornography, fake news, racist or radical and extremist views;
- contact: being subjected to harmful online interaction with other users; for example, commercial advertising as well as adults posing as children or young adults; and
- conduct: personal online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images, or online bullying.

The college will make regular contact with parents and carers to reinforce the importance of children being safe online. The college will also communicate the systems the college uses to filter and monitor online use. Curriculum areas must share with parents the topics that young people are being asked to research online.

The college will provide updates and reassurance to governors in relation to the filtering and monitoring systems in place. The college follows the safeguarding disclosure process for any concerns that are identified through our filtering. The college provides Cyber training to all staff through CPD and to all students through tutorial.

## **6.7 Campus security**

Campus security at the College ensures that all staff, students and visitors are kept safe. The College has the following controls in place:

- Visible ID policy
- Security at the entrances of the Millennium building, Woodbury Centre, Health and Digital Centre and Higher Education Building
- The College has a visitor procedure, security barriers and security guards.
- Those not displaying ID badges are challenged
- CCTV policies in place.
- Emergency and evacuation procedures are in place

## **6.8 Visitors to College premises**

To ensure that all visitors are accounted for and are on-site for a legitimate purpose. The Visitor Procedure must be followed and can be found within the Proof of ID Policy. Contractors & visitors must sign in and display the ID badge issued while on site.

## **6.9 Use of reasonable force**

The term 'reasonable force' covers the broad range of actions.

- Force is usually used either to control or restrain. This can range from guiding a pupil to safety by the arm through to more extreme circumstances such as breaking up a fight or where a student needs to be restrained to prevent violence or injury.
- 'Reasonable in the circumstances' means using no more force than is needed.

Reasonable force must only be used to control students or to restrain them where there is no other alternative.

- Control means either passive physical contact, such as standing between pupils or blocking a pupil's path, or active physical contact such as leading a pupil by the arm out of a classroom.
- Restraint means to hold back physically or to bring a pupil under control. It is typically used in more extreme circumstances, for example when two pupils are fighting and refuse to separate without physical intervention.

### **When can reasonable force be used?**

- Reasonable force can be used to prevent students from hurting themselves or others, from damaging property, or from causing disorder.
- The decision on whether or not to physically intervene is down to the professional judgement of the staff member concerned and should always depend on the individual circumstances.
- Some students with SEND, may have behaviours that become apparent throughout their course, as a last resort to safeguard the student, other students or staff, restraint may be used. This would only be done by a trained member of staff. Following an incident where this has taken place, a meeting would be arranged in relation to whether or not the students needs can be met by the College.

## **6.10 Power to ask to search students for prohibited items**

Authorised staff can request to search a learner or their bags as is reasonable given the circumstances to conduct a search for the following "prohibited items":

- knives and weapons
- alcohol
- illegal drugs
- fireworks
- pornographic images
- any article that has been or is likely to be used to commit an offence, cause personal injury or damage to property.

Where students refuse to consent to a search the College will call upon a member of the Leadership team to discuss with the student the consequences of not consenting. Where there is a concern that the student possesses any article that has been or is likely to be used to commit an offence, cause personal injury or damage to property then the police should be contacted.

Where there is not an immediate risk of harm or injury the student should be suspended and the sending student home procedure should be followed.

This should then be followed by disciplinary action.

## **6.11 Prevent**

The College Prevent strategy is embedded throughout the safeguarding policies, IT Policies, online safety, behaviour policy and procedures. The framework has Prevent threaded throughout to develop students understanding of risks and how to keep themselves and others safe. The College has a Prevent Action Plan in place which is reviewed annually.. The prevent action plan covers:

- Leadership
- Staff and Student Awareness Training
- Online Safety
- Campus Security
- Speakers and Events
- Partnerships and Local intelligence
- Work Based Learning, Sub Contractors, Community Based Learning, Distance Learning through a period of partial closure

Prevent is monitored through the Business Continuity Group.

The Safeguarding and Prevent Manager has effective links with the DfE Regional Prevent Co-Ordinator and regular liaison with the local Police prevent team, local authority, regional co-Ordinator and other agencies working with Prevent for guidance and critical reflection as required. The prevent duty sits alongside long-established safeguarding duties on professionals to protect people from a range of other harms, such as substance abuse, involvement in gangs, and physical and sexual exploitation. The duty helps to ensure that people who are susceptible to radicalisation are supported as they would be under safeguarding processes.

The College has a Lockdown policy and meets at least annually to review its effectiveness. All staff and students have prevent training and run hide tell training in the event of a terrorist attack. The College reviews this annual through a prevent action plan. The College has also reviewed this against the new Protective Security and preparedness guidance for education settings.

Any concerns around radicalisation are referred through safeguarding. The Safeguarding and Prevent Manager, makes referrals relating to Prevent.

## **6.12 Speakers and Events**

A speakers and events process ensures that all events and invited guest speaks are providing a well-rounded, well-balanced delivery that aligns with College's vision and values and will prepare students for their next steps.

No event involving any external speakers may be publicised or considered confirmed until the speaker has been cleared through the procedure detailed in this policy. This includes advertisement through any social media platform. Bury College reserves the right to cancel, prohibit or delay any event with an external speaker if the policy is not followed or if health, safety and security criteria cannot be met.

Any room booking or event organisation with an external speaker involved must be made no later than 14 days before the date of the event. This is to allow for the organiser to have made adequate safeguarding checks as well as allowing time for alterations to the event if necessary. Any request made outside of this time frame will be considered on an individual

basis in order to ensure adequate checks can be made.

The individual organising an external speaker should conduct brief research into the proposed speaker. The External Speaker Check and Review Form must be used. The Curriculum Director must approve before any arrangements are confirmed. If in doubt as to the suitability of a speaker, the decision should be referred to the DSL.

### **6.13 Fundraising**

Bury College encourages and fully supports the concept of charitable giving and welcomes such collections by staff and students across the College community. In order to ensure that monies raised through fundraising are being donated to bona fide charities which work for the good of others and do not support illegal activity such as abuse or terrorism, the following procedure must be followed:

- 2 weeks prior to the collection the lead person responsible for the activity will complete an on-line pro forma stating which charity is being supported by the fundraising, when the collection will take place and where.
- The Student Services Supervisor will approve or decline the event and will inform the lead person of the decision
- All monies collected for charity must be collected in a secure charity collection bucket (available from the Finance Office). This is a sealed bucket and must be kept sealed until the end of collection, when the monies should be immediately counted and signed for by two members of staff in a secure office.
- This must then be taken to the cash office for banking.

### **6.14 Student Contact Details**

Bury College will endeavour to keep up to date and accurate information in order to keep students safe. To do this it is essential that contact information is kept up to date. The College needs update information on:

- names and contact details of persons with whom the student normally lives
- names and contact details of all persons with parental responsibility (if different from above)
- **two adult's emergency contact details (if different from above)**
- any relevant court orders in place including those which affect any person's access to the young person (e.g. Children and Families Court Order, Injunctions etc.)
- if the young person is or has been subject to a Child Protection or Child in Need Plan
- any other factors which may impact on the safety and welfare of the child

The College will collate, store and agree access to this information, ensuring all information held electronically is stored securely with due regard to meeting GDPR, data protection and safeguarding requirements.

### **6.15 Communication, Confidentiality and Information Sharing**

Information sharing is vital in identifying and tackling all forms of abuse and neglect and promoting children's welfare, including their educational outcomes. Colleges have clear powers to share, hold and use information for this purpose. At all times we will work in partnership and endeavour to establish effective working relationships with parents, carers and colleagues from other agencies in line with Working Together to Safeguard Children.

Bury College works closely with Local Authorities and, where appropriate from a placing local authority.

As a College we recognise the importance of information sharing between professionals and local agencies. We follow best practice guidance.

The General Data Protection Act places a duty on organisations and individuals with regards to processing personal information fairly and lawfully. As a College we adhere to data protection yet we do not allow this to stand in our way in the need to promote the welfare and protect the safety of the young people in our care. The DSL will be proactive in sharing information as early as possible to help identify, assess and respond to risks or concerns about the safety and welfare of children, whether this is when problems are first emerging, or where a child is already known to the local authority children's social care.

It is important that governing bodies and proprietors are aware that among other obligations, the Data Protection Act 2018 and the GDPR place duties on organisations and individuals to process personal information fairly and lawfully and to keep the information they hold safe and secure. Governing bodies and proprietors should ensure relevant staff have due regard to the relevant data protection principles, which allow them to share (and withhold) personal data.

DPA and UK GDPR do not prevent the sharing of information for the purposes of keeping children safe and promoting their welfare. If in any doubt about sharing information, staff should speak to the designated safeguarding lead (or a deputy). Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare of children

### **6.16 Managing Complaints**

As a College we encourage young people and families to raise with us compliments, concerns or comments and have a robust internal investigation process.

The compliment, comment or complaint policy states clearly the stages of complaints and where to escalate concerns. Our complaints policy is on our College website.

Safeguarding concerns should be raised with the College immediately. All visitors are given safeguarding information which outlines how to share concerns and also the code of conduct expected by visitors/contractors.

### **6.17 Fitness to Practice/ Fitness to study**

The College has a responsibility to ensure that students who are admitted to, registered on and graduate from professional programmes are fit to practise and accordingly will provide students with appropriate teaching, support and guidance. However, situations or circumstances may arise where a student's fitness to practise is in question. Where these arise the Fitness to Practice policy should be used in conjunction with this guidance.

The College is committed to supporting students and recognises the importance of their health and wellbeing in relation to their academic progress and College experience. Students are expected to take a proactive part in the process, by managing their own health and wellbeing as well as engaging with any support, in order to fulfil their academic potential.

There may be occasions where the health or wellbeing of a student deteriorates to the point where it raises questions about their fitness and suitability to continue their studies. The

Fitness to Study Policy and Procedure will be used to deal with instances where concerns have been expressed over a student's health or behaviour.

### **6.18 Pre-16 students**

All pre-16 students will be risk assessed and protocols established as required. This will indicate whether the student is able to leave the premises at lunchtime and, if not, what the supervision arrangements will be.

Pre-16 students will be issued with a grey lanyard and Pre-16 students must not be sent out of a class or refused entry. Should a class be cancelled the Head of Curriculum will inform the pre-16 co-ordinator. Pre-16 students will be instructed not to smoke or vape on the College campus. Any safeguarding issues or concerns for Pre-16 students will be dealt with in-line with Bury College procedures and referred back to the Designated Person at the young person's institution. A College Designated Person will liaise directly with that institution

### **6.19 Children who need a social worker (Child in Need and Child Protection Plans)**

Children may need a social worker due to safeguarding or welfare needs. Children may need this help due to abuse, neglect, exploitation and complex family circumstances. A child's experiences of adversity and trauma can leave them vulnerable to further harm, as well as educationally disadvantaged in facing barriers to attendance, learning, behaviour and mental health. Local authorities should share the fact a child has a social worker, and the designated safeguarding lead will hold and use this information so that decisions can be made in the best interests of the child's safety, welfare and educational outcomes. This will be considered as a matter of routine. There are clear powers to share this information under existing duties on both local authorities and schools and colleges to safeguard and promote the welfare of children. Where children need a social worker, this will inform decisions about safeguarding (for example, responding to unauthorised absence or missing education where there are known safeguarding risks) and about promoting welfare (for example, considering the provision of pastoral and/or academic support, alongside action by statutory services). Bury College ensures that all young people with a social worker have an identified key person who will be the key contact and support.

## **SECTION F**

### **7. Associated Documents**

- Visitor Procedure
- Proof of ID
- Policy Data
- Protection
- Administering
- Medication Procedures
- Supporting Students with Medical Conditions Policy & Procedure
- Student Contract
- Education and Inspection Act 2006
- Staff Code of Conduct
- DfE Guidance "Use Of Reasonable Force 2013"
- Behavioural Policy
- Prevent Risk Assessment
- Recruitment & Selection Policy
- Agency Staff Handbook

- Control of Contractors
- Disciplinary Policy & Procedures
- Off Site Working Vehicle Policy
- Home Visit Procedure
- Rehabilitation of Offenders Act 1974 (Exceptions) order 1975 Pastoral
- Preventing youth violence and gang involvement
- Safeguarding Handbook
- Online Safety Policy
- Keeping Children Safe in Education 2024
- Behaviour and Pastoral Policy
- Online Safety Policy
- Meeting Digital Technology Standards in Schools 2023
- Designated Teacher
- Cyber Security Standards for Schools and Colleges 2023
- Working Together to safeguarding Children
- Sexual violence and sexual Harassment Between children in schools and colleges 2021
- Protective Security and preparedness guidance for education settings. 2024
- Prevent Duty Guidance for Further Education 2024
- Prevent Duty Guidance 2023

**8.**

## **SECTION G**


### **9. Monitoring, Review and Evaluation**

This policy will be reviewed annually by the DSL and Safeguarding Steering Group.



- Appendix 1 Safeguarding Referrals
- Appendix 2 Flow chart for dealing with child on child abuse, sexual harassment and/or sexual violence
- Appendix 3 Abuse by a Professional
- Appendix 4 Sending young people home
- Appendix 5 Types of Abuse and Safeguarding Concerns
- Appendix 6 Home Visits
- Appendix 7 Assignment Research- Safeguarding guidance for tutors
- Appendix 8 University of Salford Safeguarding process when attending Bury College
- Appendix 9 Child on Child Abuse, sexual violence or sexual harassment

# Appendix 1 Procedure for reporting a safeguarding concern



# Safeguarding

## Procedures for reporting a safeguarding concern

**SUSPICION, DISCLOSURE OR A CONCERN**

All staff should make a referral to the safeguarding team if they suspect abuse has taken place. Physical, emotional, Sexual abuse or neglect, forced marriage, child sexual exploitation, serious crime, honour based violence, radicalising, female genital mutilation or they have a suspicion around a young person's welfare.

Staff suspect abuse

Student discloses abuse has taken place to any member of staff

Other person/friend reports suspected abuse is taking place to a member of staff

The alleged abuse involves a member of staff

Listen, take detailed notes, do not interrogate or ask leading questions and explain your duty of care to report all cases where abuse is suspected to be taking place. Do NOT promise confidentiality

Immediately notify Lisa Woodman in HR Ext: 8321 lisa.woodman@burycollege.ac.uk

HR will take appropriate action

**Staff inform the safeguarding team**

**Urgent/ Risk of Harm**

If there is risk of significant harm or the matter is urgent staff must contact a member of the safeguarding team immediately.


**Non-urgent**

Staff should make a confidential comment under the safeguarding categories and the safeguarding team will follow this up as soon as possible. Non urgent confidential comments must still be recorded timely, within the working day of disclosure or concern is raised.

NOTE any confidential comments made and not saved under safeguarding will not notify the safeguarding team


Safeguarding team will assess the concerns and make appropriate referrals to relevant support services either external or internal. (Social care/early help/police/housing/substance misuse/mental health)

Safeguarding team to communicate appropriate information back to the staff team and advise on continues support if needed.




**Safeguarding@burycollege.ac.uk · 07713 312773**


### Contact our Safeguarding Team




**Marc McMahon**  
Safeguarding & Prevent Manager  
marc.mcmahon@burycollege.ac.uk  
07713 312773




**Ian Allonby**  
Pastoral Manager  
ian.allonby@burycollege.ac.uk  
07739 887 033



**Unmairah Mukhtar**  
Pastoral Manager  
unmairah.mukhtar@burycollege.ac.uk  
07918 721566



**Sam Pedley**  
Pastoral Manager  
samantha.pedley@burycollege.ac.uk  
07918 721 571

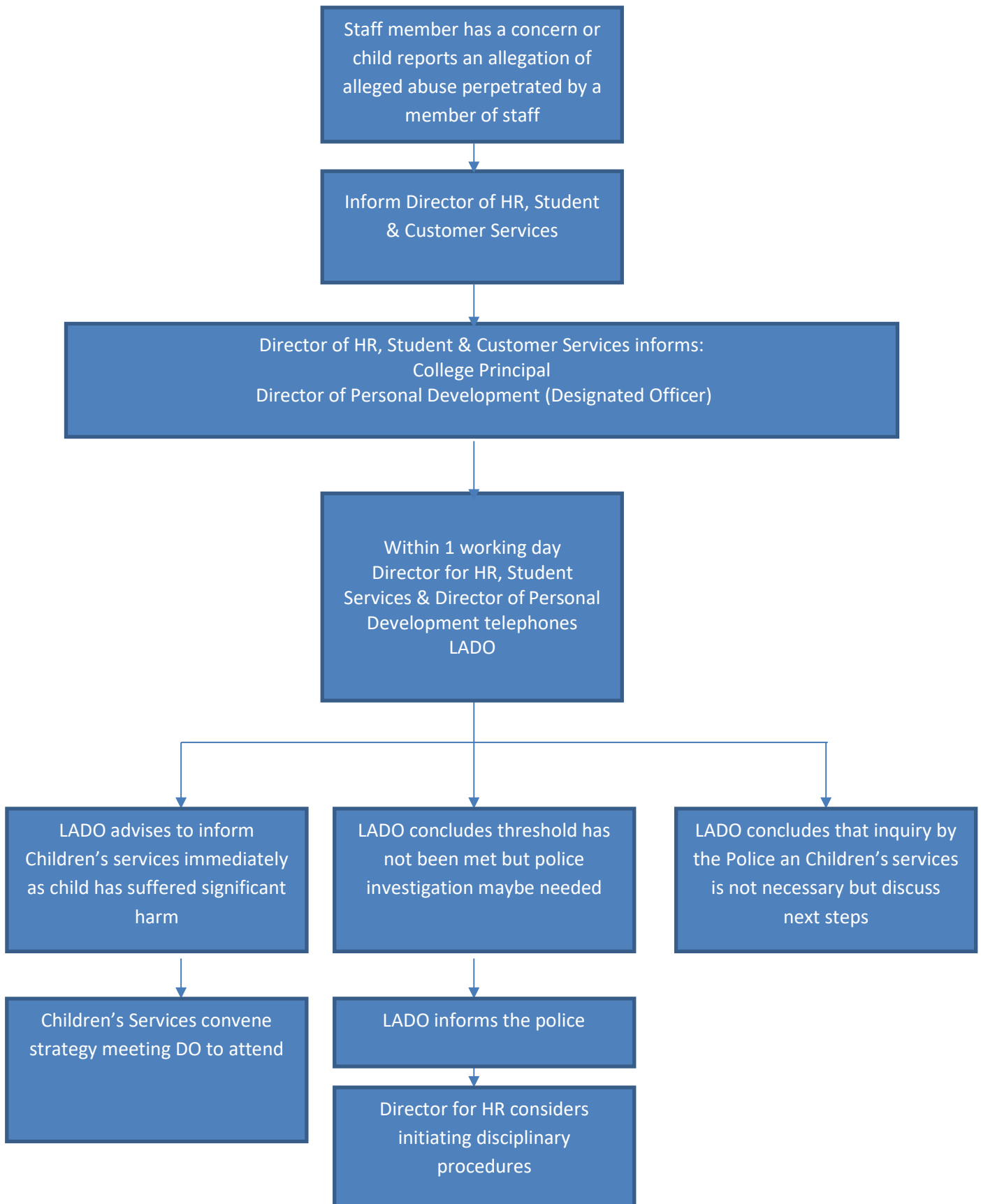


**Craig Mitchell**  
Pastoral Manager  
craig.mitchell@burycollege.ac.uk  
07545 915 294

## Appendix 2 Flow Chart for concerns around Child on child Abuse, Sexual Violence and/or Sexual Harassment



### Appendix 3 Flow chart for abuse by a professional



## Appendix 4 Sending student's home

This should be followed for any student that needs to be sent home for any reason including where a student is unwell. There may be a need to send a student home from College after a reported act of gross misconduct whilst an investigation takes place. It may also be necessary to send a student home due to persistent behaviour issues pending a parent/carer meeting. This procedure should be applied to all students studying on the College campus including those on 16-19 provision, apprenticeships and part-time and HE courses.

Where it is necessary to send a student home from College the following procedure should be adhered to:

- A student can only be sent home by a member of the Pastoral Team or Leadership Team. In certain circumstances they may instruct another member of staff to do this on their behalf, but they are responsible for ensuring the appropriate steps are taken.
- The student should be made aware of the reason why they are being sent home. This may be following an incident on campus where an investigation has to take place.
- The student's parent/carer must be contacted by telephone, the reasons for sending home explained, and confirmation provided that the student is able to travel home independently.
- A student should not be sent home unless it has been possible to speak to a parent/carer and establish that it is safe to do so. Arrangements can be made for the student to be supervised within Student Services until this has taken place. In certain situations, the Pastoral Team may be able to make a judgement to send a student home without contacting a parent/carer where they are familiar with the student and their domestic/travel arrangements.
- Where a student is clearly distressed a member of the Pastoral Team will need to assess the impact of sending home on a student's personal safety and well-being. It may be necessary to arrange a parent/carer to collect the student from College.
- If a student is on an EHCP (E on ProMonitor photograph) the personal protocol held by the ALS team must be consulted before any action is taken.
- In some situations, students may need a travel pass, this will be issued by Student Services.
- Where a violent incident has taken place between two or more students, precautions must be taken to ensure further escalation does not take place off campus.
- The student should be escorted off the College campus, another member of staff may be instructed to do this. Where a violent incident has taken place, this may need to be a security guard.
- The College ID badge should be taken from the student to prevent access to the campus during the period of suspension. If the ID badge is not surrendered reception should be instructed to deactivate.
- The incident and actions taken must be recorded as an incident on CPOM's, in certain circumstances this may need to be a confidential comment.
- A Pastoral Manager will support tutors following up the incident using the Pastoral Support System and Disciplinary Procedure.

In the case of pre-16 students, the Pastoral Manager or member of the safeguarding team must make contact with the school to make arrangements for the student to be sent home.

## Appendix 5

The following provides an overview of the types of safeguarding risks that young people face. This is not an exhaustive list. All staff should refer students to the safeguarding team if they have any concerns or require further advice without delay.

### Types of Abuse

**Abuse:** a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. 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. Abuse can include children witnessing the ill-treatment of others and that this is particularly relevant when children see, hear or experience domestic abuse and its effects.

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

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

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

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

### Bullying Including Cyberbullying

Bullying may be defined as deliberately hurtful behaviour, usually repeated over a period of time, where it is difficult for those bullied to protect themselves. It can take many forms but the

main types are:

- Physical (e.g. hitting, kicking, theft);
- Verbal (e.g. racist or homophobic remarks, threats, name-calling);
- Emotional (e.g. isolating an individual from the activities and social acceptance of their peer group); and
- Cyberbullying (including sexting).

## **Children/Young People Missing Education**

All professionals working with children and young people, as well as the wider community can help by remaining vigilant to children's safety. The law states every child/young person should be receiving an education, and we stand a better chance of ensuring their safety if we know where and how they are receiving this. The Education and Inspections Act 2006 places a duty on local authorities in England and Wales to make arrangements to identify children and young people of compulsory school age missing education in their area; we work closely to ensure we put appropriate safeguarding responses in place for children who go missing from education.

A child/young person going missing, particularly repeatedly, can act as a vital warning sign of a range of safeguarding risks, including abuse and neglect, which may include sexual abuse or exploitation; child criminal exploitation; mental health problems; substance abuse and other issues. Early intervention is necessary to identify the existence of any underlying safeguarding risk and to help prevent the risks of them going missing in future.

Bury College will hold emergency contact numbers for each student and we will inform the Local Authority when a student has been permanently excluded.

Staff should be vigilant in addressing unexplainable and/or persistent absences from education. Being absent, as well as missing, from education can be warning sign of a range of safeguarding concerns, including sexual abuse, sexual exploitation or child criminal exploitation.

## **Child Sexual Exploitation (CSE)**

Child sexual exploitation is a form of child sexual abuse. Sexual abuse may involve physical contact including penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. It may include non-contact activities, such as involving children in the production of sexual images or watching sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse including via the internet. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology. (Child Sexual Exploitation: -Definition and Guidance, Feb 2017. Gov.uk).

CSE can affect any child or young person (male or female) under the age of 18 years, including 16- and 17-year olds who can legally consent to have sex:

- Can still be abuse even if the sexual activity appears consensual
- Can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity
- Can take place in person or via technology, or a combination of both
- Can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence
- May occur without the child or young person's immediate knowledge (e.g. through others copying videos or images they have created and posted on social media)
- Can be perpetrated by individuals or groups, males or females, children or adults.



- The abuse can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse and is typified by some form of power imbalance in favour of those perpetrating the abuse. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources

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

- Unexplained gifts or new possessions;
- Association with other young people involved in exploitation;
- Older boyfriends or girlfriends;
- Suffering from sexually transmitted infections or become pregnant;
- Changes in emotional well-being;
- Misuse of drugs and alcohol;
- Going missing for periods of time or regularly coming home late
- Regularly missing school or education or do not take part in education

### **Child/Young Person Criminal Exploitation: County Lines**

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one or more importing areas [within the UK], using dedicated mobile phone lines or other form of “deal line”. Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to move [and store] drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children can be targeted and recruited into county lines in a number of locations including schools, further and higher educational institutions, pupil referral units, special educational needs schools, children’s homes and care homes. Children are often recruited to move drugs and money between locations and are known to be exposed to techniques such as ‘plugging’, where drugs are concealed internally to avoid detection. Children can easily become trapped by this type of exploitation as county lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network. One of the ways of identifying potential involvement in county lines are missing episodes (both from home and school), when the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism should be considered. If a child is suspected to be at risk of or involved in county lines, a safeguarding referral should be considered alongside consideration of availability of local services/third sector providers who offer support to victims of county lines exploitation.

Criminal exploitation of children and young people is a geographically widespread form of harm that is a typical feature of county lines criminal activity: drug networks or gangs groom and exploit children and young people to carry drugs and money from urban areas to suburban and rural areas, market and seaside towns. Key to identifying potential involvement in county lines are missing episodes, when the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism 98 should be considered. Like other forms of abuse and exploitation, county lines exploitation:

- Can affect any child or young person (male or female) under the age of 18 years;
- Can affect any vulnerable adult over the age of 18 years;

- Can still be exploitation even if the activity appears consensual;
- Can involve force and/or enticement-based methods of compliance and is often accompanied by violence or threats of violence;
- Can be perpetrated by individuals or groups, males or females, and young people or adults; and
- Is typified by some form of power imbalance in favour of those perpetrating the exploitation. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, cognitive ability, physical strength, status, and access to economic or other resources.

Some of the following signs may be indicators of criminal exploitation:

- Unexplained gifts or new possessions;
- Association with other young people involved in exploitation;
- Changes in emotional well-being;
- Misuse of drugs and alcohol;
- Going missing for periods of time or regularly come home late
- Regularly missing school or education or do not take part in education

Both **CSE** and **CCE** are forms of abuse and both occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal activity, in exchange for something the victim needs or wants and/or the financial advantage and increased status of the perpetrator or facilitator through violence or threat of violence. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources. The abuse can be perpetrated by individuals or groups, males or females, and children or adults. The abuse can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence. Victims can be exploited even when activity appears consensual and it should be noted exploitation as well as being physical can be facilitated and/or take place online.

Children can become trapped by this type of exploitation as perpetrators can threaten victims and their families with violence or entrap or coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry weapons as a sense of protection. As children become involved in criminal exploitation often commit crimes themselves, their vulnerability as victims is not always recognised by adults and professionals. They are not always treated as victims despite the harm they have experienced, this occurs particularly in older children. They may have been criminally exploited even if the activity appears to be something that they have agreed or consented to.

It is important to note that the experience of girls that are criminally exploited can be different to that of boys. The indicators may not be the same, however professionals should be aware that girls are at risk too. It is important to note that both boys and girls that are criminally exploited may be at higher risk of sexual exploitation.

**Domestic Violence** – Any incident or pattern of incidents of controlling, coercive or 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. This can encompass but is not limited to the following types of abuse:

- Psychological
- Physical
- Sexual
- Financial
- Emotional

Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result. Domestic abuse affecting young people can also occur within their personal relationships, as well as in the context of their home life. This can impact on children who are, seeing, hearing or experiencing the effects of domestic abuse through their own intimate relationships.

Operation Encompass operates in the majority of police forces across England. It helps police and schools work together to provide emotional and practical help to children. The system ensures that when police are called to an incident of domestic abuse, where there are children in the household who have experienced the domestic incident, the police will inform the key adult (usually the designated safeguarding lead) in school before the child or children arrive at school the following day. This ensures that the school has up to date relevant information about the child's circumstances and can enable support to be given to the child according to their needs. Police forces not signed up to operation encompass will have their own arrangements in place

**Drugs** - There is evidence that children and young people are increasingly misusing alcohol and illegal drugs. Consequences range from non-attendance and poor attainment at school and College, poor health, committing crime to support 'habits' and also increased risk of being a victim of violent crime and sexual exploitation.

**Equality Act 2010** Colleges have obligations under the Equality Act 2010 (the Equality Act).

According to the Equality Act, schools and colleges must not unlawfully discriminate against pupils because of their sex, race, disability, religion or belief, gender reassignment, pregnancy and maternity, or sexual orientation (protected characteristics).

Whilst all of the above protections are important, in the context of safeguarding, this guidance, and the legal duties placed on schools and colleges in relation to safeguarding and promoting the welfare of children, governing bodies and proprietors should carefully consider how they are supporting their pupils and students with regard to particular protected characteristics - including disability, sex, sexual orientation, gender reassignment and race.

Provisions within the Equality Act allow schools and colleges to take positive action, where it can be shown that it is proportionate, to deal with particular disadvantages affecting pupils or students with a particular protected characteristic in order to meet their specific need, this includes a duty to make reasonable adjustments for disabled children and young people, including those with long term conditions. A school or college, could, for example, consider

taking positive action to support girls if there was evidence they were being disproportionately subjected to sexual violence or sexual harassment.

**Fabricated or induced illness** - Fabricated or Induced Illness is a condition whereby a child/young person suffers harm through the deliberate action of their carer and which is attributed by the adult to another cause.

There may be a number of explanations for these circumstances and each requires careful consideration and review. Concerns about a child/young person's health should be discussed with a health professional who is involved with them.

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

FGM is known by a number of names including "cutting", "female circumcision" or "initiation". The term female circumcision suggests that the practice is similar to male circumcision, but it bears no resemblance to male circumcision, has serious health consequences and no medical benefits.

Tutors must personally report to the police cases where they discover that an act of FGM appears to have been carried out. Unless the teacher has good reason not to, they should still consider and discuss any such case with the school or College's designated safeguarding lead (or deputy) and involve children's social care as appropriate. The duty does not apply in relation to at risk or suspected cases (i.e. where the teacher does not discover that an act of FGM appears to have been carried out, either through disclosure by the victim or visual evidence) or in cases where the woman is 18 or over. In these cases, tutors should follow local safeguarding procedures.

**Forced Marriage** - Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some communities use religion and culture as a way to coerce a person into marriage. Schools and Colleges can play an important role in safeguarding children from forced marriage.

There are some significant differences between the referral of a concern about a young person being forced into marriage and other child protection referrals. Professionals must be aware that sharing information with a young person's parents, extended family or members of their community, could put the young person in a situation of significant risk. Any disclosure that indicates a young person may be facing a forced marriage must be taken seriously by professionals who should also realise that this could be 'one chance to save a life'. A forced marriage is a marriage in which one or both spouses do not consent to the marriage but are coerced into it. Duress can include physical, psychological, financial, sexual and emotional pressure. In cases of vulnerable adults who lack the capacity to consent to marriage, coercion is not required for a marriage to be forced. In addition, since February 2023 it has also been a crime to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday, even if violence, threats or another form of coercion are not used. As with the existing forced marriage law, this applies to non-binding, unofficial 'marriages' as

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

### **Gangs and Youth Violence**

Dealing with gang or youth violence issues in an area is a shared responsibility for the community and partner agencies. Schools or Colleges affected by these issues will be able to draw advice and support from their local partners, such as the police, youth offending teams, other local authority teams or the voluntary and community sector. The Local Safeguarding Children Board (LSCB) may also have a strategy to address these issues.

### **Homelessness**

Homelessness means not having a home. A home is a place that provides security, privacy, and links to a community and support network. It needs to be decent and affordable. Under the law, even if someone has a roof over their head they can still be homeless. This is because they may not have any right to stay where they live or their home may be unsuitable to live in.

### **Human Rights**

The Human Rights Act 1998 (HRA) sets out the fundamental rights and freedoms that everyone in the UK is entitled to and contains the Articles and protocols of the European Convention on Human Rights (ECHR) (the Convention) that are deemed to apply in the UK. The college will respect and protect an individual's human rights when the college makes individual decisions about them.

Under the HRA, it is unlawful for schools and colleges to act in a way that is incompatible with the Convention. The specific convention rights applying to schools and colleges are:

Article 3: the right to freedom from inhuman and degrading treatment (an absolute right) •  
Article 8: the right to respect for private and family life (a qualified right) includes a duty to protect individuals' physical and psychological integrity

Article 14: requires that all of the rights and freedoms set out in the Act must be protected and applied without discrimination

Protocol 1, Article 2: protects the right to education.

Being subjected to harassment, violence and or abuse, including that of a sexual nature, may breach any or all of these rights, depending on the nature of the conduct and the circumstances.

## Children who are lesbian, gay, bisexual, or Gender questioning

N.B. This section remains under review, pending the outcome of the gender questioning children guidance consultation, and final gender questioning guidance documents being published.

A child or young person being lesbian, gay, or bisexual is not in itself an inherent risk factor for harm, however, they can sometimes be targeted by other children. In some cases, a child who is perceived by other children to be lesbian, gay, or bisexual (whether they are or not) can be just as vulnerable as children who are.

However, the Cass review identified that caution is necessary for children questioning their gender as there remain many unknowns about the impact of social transition and children may well have wider vulnerabilities, including having complex mental health and psychosocial needs, and in some cases additional diagnoses of autism spectrum disorder and/or attention deficit hyperactivity disorder.

It recommended that when families/carers are making decisions about support for gender questioning children, they should be encouraged to seek clinical help and advice. When parents are supporting pre-pubertal children, clinical services should ensure that they can be seen as early as possible by a clinical professional with relevant experience.

As such, when supporting a gender questioning child, schools should take a cautious approach and consider the broad range of their individual needs, in partnership with the child's parents (other than in the exceptionally rare circumstances where involving parents would constitute a significant risk of harm to the child), including any clinical advice that is available and how to address wider vulnerabilities such as the risk of bullying.

Schools should refer to our Guidance for Schools and Colleges in relation to Gender Questioning Children, when deciding how to proceed.

Risks can be compounded where children lack trusted adults with whom they can be open. It is therefore vital that staff endeavour to reduce the additional barriers faced and create a culture where they can speak out or share their concerns with members of staff.

### **Mental Health**

Short term stress and worry is a normal part of life and many issues can be experienced as mild or transitory challenges for some children and their families. Others will experience more serious and longer lasting effects. The same experience can have different effects on different children depending on other factors in their life. For example, it is normal for children to feel nervous or under stress around exam times, but other factors can make such stress part of an enduring and persistent mental health problem for some children. When a problem is particularly severe or persistent over time, or when a number of these difficulties are experienced at the same time, children are often described as experiencing mental health problems.

Where children experience a range of emotional and behavioural problems that are outside the normal range for their age, they might be described as experiencing mental health problems or disorders. Mental health professionals have classified these as:

- emotional disorders, for example phobias, anxiety states and depression

- conduct disorders, for example stealing, defiance, fire-setting, aggression and anti-social behaviour
- hyperkinetic disorders, for example disturbance of activity and attention
- developmental disorders, for example delay in acquiring certain skills such as speech, social ability or bladder control, primarily affecting children with autism and those with pervasive developmental disorders
- attachment disorders, for example children who are markedly distressed or socially impaired as a result of an extremely abnormal pattern of attachment to parents or major care givers
- Trauma disorders, such as post-traumatic stress disorder, as a result of traumatic experiences or persistent periods of abuse and neglect
- Other mental health problems including eating disorders, habit disorders, somatic disorders; and psychotic disorders such as schizophrenia and manic-depressive disorder.

It is essential to be vigilant in identifying early signs of mental health or wellbeing support so that early intervention can be put in place.

### **Intra Familiar Harms**

Sexual abuse perpetrated within family environments often remains hidden and can be the most secretive and difficult type of abuse for children and young people to disclose.

Many children and young people do not recognise themselves as victims of sexual abuse; a child may not understand what is happening to them; they may even interpret the abuse as a normal family relationship. Perpetrators can and do seek to reduce the risk of disclosure by including in the following ways:

- Disguising the sexual abuse as part of loving / caring;
- Threatening the child or young person e.g. with loss of activities, breakup of the family;
- Telling the child or young person that they will not be believed;
- Holding the child/YP responsible for their own abuse.

Perpetrators of sexual abuse are very sophisticated in their behaviour which means it is often difficult to detect. Where more than one child / young person is being abused within a family it may be possible to identify by patterns of referrals or presentations to different agencies in their local community over time.

Children may disclose sexual abuse verbally while others may attempt to disclose by non-verbal means including changes in their behaviours, this requires those around them not just to focus on the behaviour but to try and understand why the behaviour may be happening. This is particularly the case for pre-verbal children who rely solely on adults around them notice and respond.

Children may exhibit a range of signs but any one sign doesn't necessarily mean that a child is being sexually abused; however the presence of a number of signs should indicate that you need to consider the potential for sexual abuse and consult with others who know the child to identify whether they also have concerns.

Signs that can indicate sexual abuse include:

- The adults behaviour around the child e.g. being over familiar, treats child differently to other children in the family;
- Changes in behaviour, including becoming more aggressive, withdrawn, clingy, loss of eye contact;
- Problems in school, difficulty concentrating, drop off in academic performance;
- Sleep problems and/or regression i.e. bed wetting;
- Frightened of or seeking to avoid spending time with a particular person;
- Knowledge of sexual behaviour/language that seems inappropriate for child's age, level of understanding;
- Physical symptoms including pregnancy in adolescents where the identity of the father is vague or secret, STIs, discharge or unexplained bleeding;
- Poor hygiene, which often leads to social isolation in school;
- Injuries and bruises on parts of the body where other explanations are not available especially bruises, bite marks or other injuries to breasts, buttocks, lower abdomen or thighs;



- Injuries to the mouth particularly but not exclusively in babies e.g. torn frenulum, which may be noted by dental practitioners; and
- Disclosures to adults or another child / young person.

### **Missing from Education**

The College has a responsibility to ensure that all staff are aware that children and young people who go missing, particularly repeatedly, can act as a vital warning sign of a range of safeguarding possibilities. Early intervention is necessary to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child going missing in future. Staff should be aware of and follow the College unauthorised absence and children missing from education procedures.

On occasions where 14 to 16-year old students are on a programme of study at the College, the College has a responsibility to inform named schools when the attendance or absence of a 14 to 16-year-old student becomes a cause for concern so that the school can implement their own attendance or missing in education procedures.

This should include a consideration of holiday requests within term time. Any requests for holidays should be approved by the Head of Curriculum.

### **Missing from Home or Care**

There are strong links between children and young people involved in sexual exploitation and other behaviours such as running away from home or care, bullying, self-harm, teenage pregnancy, truancy and substance misuse. In addition, some are particularly vulnerable, for example, children/young people with special needs, those in residential or foster care, those leaving care, migrant children, particularly those who are unaccompanied, those forced into marriage, those involved in gangs and unaccompanied asylum-seeking children. The majority of children/young people who go missing are not in care and go missing from their family home. However, those who are looked after/ previously looked after are much more likely to run away than those who live at home, and over 50% of young people in care have run away at some point.

### **Child on Child Abuse**

All Bury College staff are aware safeguarding issues can manifest themselves via child on child abuse. This is most likely to include, but not limited to:

- Bullying (including cyber bullying, prejudice based and discriminatory bullying)
- Abuse in intimate personal relationships between peers
- Physical abuse such as hitting, kicking, biting, hair pulling or otherwise causing physical harm (this may include an online element which facilitates, threatens or encourages physical abuse)
- Sexual Violence, such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence)
- Sexual Harassment, such as sexual comments, remarks, jokes and online sexual harassment, which made be stand alone or part of a wider pattern of abuse
- Causing some to engage in sexual activity without consent such as forcing someone to strip, touch themselves sexual or engage in sexual activity with a third party
- Consensual and Non-Consensual sharing of nude or semi-nude imagery or videos (also known as sexting or youth produced sexual imagery).

- Upskirting, which involves taking an image under a person's clothing without their permission, with the intention of viewing their genitals or buttocks for sexual gratification or to cause the victim humiliation, distress or alarm.
- Initiating/hazing type violence and rituals, this can include activities involving harassment, abuse or humiliation used as a way of initiating somebody into the a group.

Staff must challenge any form of derogatory and sexualised language or behaviour. Staff should be vigilant to sexualised/aggressive touching/grabbing particularly towards girls. Behaviours by young people should never be passed off as 'banter' or 'part of growing up'. The DFE states 'child on child abuse should be taken as seriously as abuse by adults and should be subject to the same child protection procedures. sexual violence and sexual harassment;

Professionals should not dismiss abusive behaviour as normal between young people and should not develop high thresholds before taking action. All staff should be able to reassure victims that they are being taken seriously and that they will be supported and kept safe. A victim should never be made to feel they are creating a problem by reporting abuse, sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report. Concerns should be referred to the Designated Safeguarding Lead. Victims of child on child abuse will be supported by the safeguarding team and referred to specialist agencies if appropriate

Bury College has an anti-bullying and positive behaviour policy, along with a Student Code of conduct.

#### Public Sector Equality Duty

The Public Sector Equality Duty (PSED) is found in the Equality Act. Compliance with the PSED is a legal requirement for colleges. The PSED places a general duty on colleges to have, in the exercise of their functions, due regard to the need to eliminate unlawful discrimination, harassment and victimisation (and any other conduct prohibited under the Equality Act), to advance equality of opportunity and foster good relations between those who share a relevant protected characteristic and those who do not. The duty applies to all protected characteristics and means that whenever significant decisions are being made or policies developed, specific consideration must be given to the equality implications of these such as, for example, the need to eliminate unlawful behaviours that relate to them such as sexual violence and sexual harassment, misogyny/misandry and racism. This is one reason why good record-keeping and monitoring of all forms of abuse and harassment is essential. The PSED helps schools and colleges (which are subject to it) to focus on key issues of concern and how to improve student outcomes. Some students may be more at risk of harm from specific issues such as sexual violence, homophobic, biphobic or transphobic bullying or racial discrimination. Such concerns will differ between education settings, but it is important colleges are conscious of disproportionate vulnerabilities and integrate this into their safeguarding policies and procedures. The college manages this through educating students through the tutorial sessions and addressing any breaches through the disciplinary process as set out in the behaviour policy.

## **On-Line Safety**

The use of technology has become a significant component of many safeguarding issues. The internet can be a fantastic place for children and young people where they can talk to friends, be creative and have fun. However, just like in the real world sometimes things can go wrong.

Working with our students we have a curriculum that develops skills in identifying and avoiding risk, learning how best to protect themselves and their friends, and knowing how to get support and report abuse if they do encounter difficulties.

At Bury College we have filters and monitoring systems in place and these are regulated and risk assessed as part of the prevent duty. We have an online safety policy which identifies the usage and expected behaviour of staff and students. As a College of further education, we appreciate the value of technology and that appropriate filters are in place yet does not lead to unreasonable restrictions which would limit online teaching.

We recognise that our safeguarding responsibilities are clearly linked to our responsibilities for ensuring that appropriate responses are in place for children who are absent from College or who go missing from education.

We also recognise that safeguarding against radicalisation and extremism is no different to safeguarding against any other vulnerability in today's society. Our staff are alert to signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns such as travelling to conflict zones, FGM and forced marriage.

## **Online Hoax's and Challenges**

The designated safeguarding lead (DSL) will look at online hoax's or challenges on case-by-case assessment, establishing the scale and nature of the possible risk to children and young people, including considering (where the evidence allows) if the risk is a national one or is it localised to your area, or even just your institution. Quick local action may prevent a local online hoax or local harmful online challenge going viral (quickly and widely spread).

The DSL will check the factual basis of any harmful online challenge or online hoax with a known, reliable and trustworthy source, such as from the UK Safer Internet Centre. Where harmful online challenges or online hoaxes appear to be local (rather than large scale national ones) local safeguarding advice, such as from the local authority or local police force, may also be appropriate and helpful.

A hoax is a deliberate lie designed to seem truthful. The internet and social media provide a perfect platform for hoaxes, especially hoaxes about challenges or trends that are said to be harmful to children and young people to be spread quickly.

The DSL will carefully consider if a challenge or scare story is a hoax. Generally speaking, naming an online hoax and providing direct warnings is not helpful. Concerns are often fuelled by unhelpful publicity, usually generated on social media, and may not be based on confirmed or factual occurrences or any real risk to children and young people. There have been examples of hoaxes where much of the content was created by those responding to the story being reported, needlessly increasing children and young people's exposure to distressing content.

## **Prevent and Radicalisation –**

Since 2010, when the Government published the first version of the Prevent Strategy, there has been an awareness of the specific need to safeguard children, young people and families from extremist ideologies. There have been several occasions both locally and nationally in which extremist groups have attempted to radicalise vulnerable children and young people to hold extreme views including views 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.

Bury College values freedom of speech and the expression of beliefs and ideology as fundamental rights underpinning our society's values. Students and staff have the right to speak freely and voice their opinions. However, freedom comes with responsibility and free speech that is designed to manipulate the vulnerable or that leads to violence and harm of others goes against the moral principles in which freedom of speech is valued. Free speech is not an unqualified privilege; it is subject to laws and policies governing equality, human rights, community safety and community cohesion.

The current threat from terrorism in the United Kingdom may include the exploitation of vulnerable people, to involve them in terrorism or in activity in support of terrorism. The normalisation of extreme views may also make children and young people vulnerable to future manipulation and exploitation. Bury College is clear that this exploitation and radicalisation must be viewed as a safeguarding concern and that protecting children from the risk of radicalisation is part of the College's safeguarding duty.

Bury College seeks to protect students against the messages of all violent extremism including, but not restricted to, those linked to Islamist ideology, or to Far Right/Neo-Nazi/White Supremacist ideology, Domestic Terrorism, Irish Nationalist and Loyalist paramilitary groups, and extremist Animal Rights movements.

### **Risk Reduction**

The DSL will assess the level of risk within the College and put actions in place to reduce that risk. Risk assessment includes consideration of the use of College premises by external agencies, external speakers and use of IT. The College holds a Prevent Steering Group once a every half term to review the risks.

This risk assessment is reviewed throughout the academic year and this information is shared with the DfE HE/FE North West Prevent Lead – Nigel Lund

### **Response**

With effect from 1 July 2015, all schools are subject to a duty to have "due regard to the need to prevent people being drawn into terrorism" (section 26, Counter Terrorism and Security Act 2015). This is known as The Prevent Duty.

There is no single way to identify an individual who is likely to be susceptible to an extremist ideology. Specific background factors may contribute to vulnerability and these are often combined with specific needs for which an extremist group may appear to provide answers, and specific influences such as family, friends and online contacts. The use of social media has become a significant feature in the radicalisation of young people. More information on these factors is in Appendix 1.

Our College, like all others, is required to identify a Prevent Single Point of Contact (SPOC) who will be the lead within the organisation for safeguarding in relation to protecting individuals from radicalisation and involvement in terrorism: The SPOC is Marc McMahon.

Staff will be alert to changes in student's behaviour or attitude which could indicate that they are in need of help or protection.

Our College will monitor online activity within the College to ensure that inappropriate sites are not accessed by students or staff. This is done by the use of specialist online monitoring software, which in this College is called Barracuda.

When any member of staff has concerns that a student may be at risk of radicalisation or involvement in terrorism, they should speak with the SPOC .

Numerous factors can contribute to and influence the range of behaviours that are defined as violent extremism, but most 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, relationship or drug/alcohol issues.

### **Channel**

Channel is a multi-agency approach to provide support to individuals who are at risk of being drawn into terrorist related activity. It is led by the Manchester Police Counter-Terrorism Unit, and it aims to:

- Establish an effective multi-agency referral and intervention process to identify vulnerable individuals;
- Safeguard individuals who might be vulnerable to being radicalised, so that they are not at risk of being drawn into terrorist-related activity;
- Provide early intervention to protect and divert people away from the risks they face and reduce vulnerability;
- The Channel programme focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. It provides a mechanism for schools to make referrals if they are concerned that an individual might be vulnerable to radicalisation. An individual's participation in the programme is entirely voluntary at all stages; and
- Colleges have a duty to cooperate with the Channel programme in the carrying out of its functions, and with the Police in providing information about an individual who is referred to Channel (Section 38, Counter Terrorism and Security Act 2015).

### **Sexual Violence and Sexual Harassment**

Sexual violence and sexual harassment can occur between two children of any age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.

Children/young people who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment. Sexual violence and sexual harassment exist on a continuum and

may overlap, they can occur online and offline (both physical and verbal) and are never acceptable. It is important that all victims are taken seriously and offered appropriate support. Staff should be aware that some groups are potentially more at risk. Evidence shows girls, children with SEND and LGBT children are at greater risk.

Staff should be aware of the importance of:

- Making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up;
- Not tolerating or dismissing sexual violence or sexual harassment as “banter”, “part of growing up”, “just having a laugh” or “boys being boys”;
- Challenging behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them; and
- Upskirting which typically involves taking a picture under a person’s clothing without them knowing, with the intention of viewing their genitalia or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm

It is important that College staff are aware of sexual violence and the fact young people can, and sometimes do, abuse their peers in this way. When referring to sexual violence we are referring to sexual offences under the Sexual Offences Act 2003 as described below:

- Rape: A person (A) commits an offence of rape if: he intentionally penetrates the vagina, anus or mouth of another person (B) with his penis, B does not consent to the penetration and A does not reasonably believe that B consents.
- Assault by Penetration: A person (A) commits an offence if: s/he intentionally penetrates the vagina or anus of another person (B) with a part of her/his body or anything else, the penetration is sexual, B does not consent to the penetration and A does not reasonably believe that B consents.
- Sexual Assault: A person (A) commits an offence of sexual assault if: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents.
- What is consent? Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another, e.g. to vaginal but not anal sex or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity and each time activity occurs. Someone consents to vaginal, anal or oral penetration only if s/he agrees by choice to that penetration and has the freedom and capacity to make that choice.

## **Sexual Harassment**

When referring to sexual harassment we mean ‘unwanted conduct of a sexual nature’ that can occur online and offline. When we reference sexual harassment, we do so in the context of young person on young person sexual harassment. Sexual harassment is likely to: violate a young person’s dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment.

Whilst not intended to be an exhaustive list, sexual harassment can include:

- Sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names;
- Sexual “jokes” or taunting;
- Physical behaviour, such as: deliberately brushing against someone, interfering with someone’s clothes (schools and Colleges should be considering when any of this crosses a line into sexual violence - it is important to talk to and consider the experience of the victim) and displaying pictures, photos or drawings of a sexual nature; and online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence. It may include:
  - Non-consensual sharing of sexual images and videos;
  - Sexualised online bullying;
  - Unwanted sexual comments and messages, including, on social media;
  - Sexual exploitation; coercion and threats; and
  - Upskirting.

### **Sexual violence**

Referring to sexual offences under the Sexual Offences Act 2003<sup>14</sup> as described below:

**Rape:** A person (A) commits an offence of rape if: he intentionally penetrates the vagina, anus or mouth of another person (B) with his penis, B does not consent to the penetration and A does not reasonably believe that B consents.

**Assault by Penetration:** A person (A) commits an offence if: s/he intentionally penetrates the vagina or anus of another person (B) with a part of her/his body or anything else, the penetration is sexual, B does not consent to the penetration and A does not reasonably believe that B consents.

**Sexual Assault:** A person (A) commits an offence of sexual assault if: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents. (Colleges should be aware that sexual assault covers a very wide range of behaviour so a single act of kissing someone without consent or touching someone’s bottom/breasts/genitalia without consent, can still constitute sexual assault.)

**Causing someone to engage in sexual activity without consent:** A person (A) commits an offence if: s/he intentionally causes another person (B) to engage in an activity, the activity is sexual, B does not consent to engaging in the activity, and A does not reasonably believe that B consents. (This could include forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.)

### **Response to a report of Sexual Violence or Sexual Harassment**

The initial response to a report from a young person is important. It is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report. Victims should be made aware of the laws and that they are there to protect and support them.

Staff must challenge any form of derogatory and sexualised language or behaviour. Staff should be vigilant to sexualised/aggressive touching/grabbing particularly towards girls. Behaviours by young people should never be passed off as ‘banter’ or ‘part of growing up’.

Professionals should not dismiss abusive behaviour as normal between young people and should not develop high thresholds before taking action. All staff should be able to reassure victims that they are being taken seriously and that they will be supported and kept safe. A

victim should never be given they are creating a problem by reporting abuse, sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report. Concerns should be referred to the Designated Safeguarding Lead. Victims of child on child harm will be supported by the safeguarding team and referred to specialist agencies if appropriate

If staff have a concern about a young person or a young person makes a report to them, they should follow the safeguarding referral process. As is always the case, if staff are in any doubt as to what to do they should speak to the designated safeguarding lead (or a deputy). College behaviour and disciplinary policy will support any sanctions. The Sexual Violence and Harassment Policy provides further details on how incidents are dealt with.

### **Sexting**

Sexting is when a young person takes indecent images of them self and sends this to their friends or boy / girlfriends via mobile phones. The problem is that once taken and sent, the



sender has lost control of these images and these images could end up anywhere. They could be seen by your child's future employers, their friends or even by paedophiles.

By having in their possession, or distributing, indecent images of a person under 18 on to someone else – young people are not even aware that they could be breaking the law as these are offences under the Sexual Offences Act 2003. This includes consensual and non-consensual sharing of nudes or semi-nude images or videos.

## Trafficking

Human trafficking is defined by the UNHCR guidelines (2006) as a process that is a combination of three basic components:

- Movement (including within the UK);
- Control, through harm / threat of harm or fraud; and
- For the purpose of exploitation.

The Palermo Protocol establishes children/young people as a special case for whom there are only two components – movement and exploitation. Any child/young person transported for exploitative reasons is considered to be a trafficking victim – whether or not s/he has been deceived, because it is not considered possible for children to give informed consent.

A child/young person may be trafficked between several countries in the EU or globally, prior to being trafficked into/within the UK. The child may have entered the UK illegally or legally (i.e. with immigration documents), but the intention of exploitation underpins the entire process. Victims may be indigenous UK nationals, European Union [EU] nationals from any country outside the EU.

## Upskirting

'Upskirting' typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is now a criminal offence.

As a College we are aware of the potential for children and young people with **SEND** to have additional barriers when it comes to safeguarding, Bury College recognises that this group can be more vulnerable to abuse and neglect. Disabled children/young people may be especially vulnerable to abuse, because they may have an impaired capacity to resist or avoid abuse. They may have speech, language and communication needs which may make it difficult to tell others what is happening.

Heightened vulnerability linked to:

- Communications skills;
- Maturity (Lower cognitive ability);
- Perceptions of intent from others;
- Lower self-esteem/confidence;
- Potential to trust unreservedly;
- A need to have "friends" or find a partner;

- Differing boundaries; and
- Online safety – digital technology understanding

A combination of these factors can make them more susceptible to risks.

Young people develop and mature at different rates. Parental behaviours may also indicate abuse or neglect, so you should also be alert to parent/young person interactions which are concerning and other parental behaviours. This could include parents who are under the influence of drugs or alcohol, if there is a sudden change in their mental health or if domestic abuse is present. By understanding the warning signs, you can respond to problems as early as possible and provide the right support and services for the young person and their family.

Children and young people say they need:

- **Vigilance:** to have adults notice when things are troubling them;
- **Understanding and action:** to be heard and understood; and to have that understanding acted upon;
- **Stability:** to be able to develop an on-going stable relationship of trust with those helping them;
- **Respect:** to be treated with the expectation that they are competent, rather than not;
- **Information and engagement:** to be informed about and involved in procedures, decisions, concerns and plans;
- **Explanation:** to be informed of the outcome of assessments, decisions and how they have been reached, positive or negative;
- **Support:** to be provided with support in their own right as well as a member of their family; and
- **Advocacy:** to be provided with advocacy, to assist them in putting forward their views.

### **Victims and alleged perpetrator(s)**

There are many different ways to describe children who have been subjected to sexual violence and/or sexual harassment and many ways to describe those who are alleged to have carried out any form of abuse.

For the purposes of this policy, we use the term 'victim'. It is a widely recognised and understood term. It is important to recognise that not everyone who has been subjected to sexual violence and/or sexual harassment considers themselves a victim or would want to be described in this way. Ultimately, we should be conscious of this when managing any incident and be prepared to use any term with which the individual child/student is most comfortable.

For the purpose of this advice, we use the term 'alleged perpetrator(s)' and where appropriate 'perpetrator(s)'. These are widely used and recognised terms and the most appropriate to aid effective drafting of advice. However, we should think very carefully about terminology, especially when speaking in front of children or adults, not least because in some cases the sexual behaviour will have been harmful to the perpetrator as well.

**Youth produced sexual imagery 'Sharing nudes and semi nudes'** : This advice uses the term 'sharing nudes and semi-nudes' to mean the sending or posting of nude or semi-nude images, videos or live streams by young people under the age of 18 online. This could be via social media, gaming platforms, chat apps or forums. It could also involve sharing between devices via services like Apple's Airdrop which works offline. The term 'nudes' is used as it is most commonly recognised by young people and more appropriately covers all types of image sharing incidents. Alternative terms used by children and young people may include 'dick pics' or 'pics'. he motivations for taking and sharing nude and semi-nude images, videos and live streams are not

always sexually or criminally motivated. Such images may be created and shared consensually by young people who are in relationships, as well as between those who are not in a relationship. It is also possible for a young person in a consensual relationship to be coerced into sharing an image with their partner. Incidents may also occur where:

- children and young people find nudes and semi-nudes online and share them claiming to be from a peer
- children and young people digitally manipulate an image of a young person into an existing nude online
- images created or shared are used to abuse peers e.g. by selling images online or obtaining images to share more widely without consent to publicly shame

The sharing of nudes and semi-nudes can happen publicly online, in 1:1 messaging or via group chats and closed social media accounts.

Nude or semi-nude images, videos or live streams may include more than one child or young person.

Creating and sharing nudes and semi-nudes of under-18s (including those created and shared with consent) is illegal which makes responding to incidents involving children and young people complex. There are also a range of risks which need careful management from those working in education settings.

**Consent:** Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another, e.g. to vaginal but not anal sex or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity and each time activity occurs. Someone consents to vaginal, anal or oral penetration only if s/he agrees by choice to that penetration and has the freedom and capacity to make that choice

### **Looked After Children and previously looked after children**

All Local Authorities are advised to support the raising of the educational attainment and achievement of their Looked After Children and previously Looked After Children through the overarching support of a Virtual School. The responsibility for each child's education, target setting, learning and teaching remains with the College where they are enrolled.

Bury and Greater Manchester Virtual School for Looked After Children provides a support and challenge role for schools and Local Authority teams in the form of staffing support; access to additional resources to support educational outcomes; information, advice and guidance (especially around Personal Education Plans); monitoring and tracking of educational outcomes and targets, and training and support at key transitional moment. The Assistant Principal is the Designated teacher for Looked After and previously Looked after Children. The Safeguarding and Prevent Manager has the day to day responsibility for the operational support.

## Appendix 6 Home Visits

1. Home visits can be arranged for students and apprentices who:
  - The College have been unable to contact
  - The College have concerns about their welfare due to lack of engagement
2. Requests for a home visit should be made to the relevant Pastoral Manager (PM) for students or the Departmental Lead (DL) for apprentices. The request should be made via the ProMonitor comment category – Home Visit.
3. The ProMonitor Home Visit comment should outline:
  - Current attendance summary
  - Academic progress
  - An explanation of the cause for concern
  - The reason for suggesting a home visit
  - Any additional background information relating to personal circumstances
  - Coursework and learning materials that need to be taken
4. The home visit will be carried out by a member of the Pastoral Team, who will in conjunction with the Safeguarding Manager determine if the visit requires more than one person to attend; this may be done on the basis of location, circumstances or other information provided by the PM.
5. Details of the visit will be recorded in the Home Visits book held in Student Services and will be updated on return to College by Student Services.
6. Home visits should be carried out following the guidance and procedures outlined in the *Off-Site Working* document, which can be found on the Bury College Intranet
  - Comply with College requirements for travel to and from the place of visit
  - Take a mobile phone with them, keep it switched on and advise Student Services Supervisor of the mobile number (there is a facility on smartphones to activate a GPS tracker that enables the phone's whereabouts to be tracked if appropriate)
  - Inform Student Services Supervisor on return to College
7. The College risk assessment must be followed for the visit.
8. Upon return to College the member of staff who carried out the visit will record a ProMonitor follow-up comment to summarise the main discussion points and actions.
9. Where there are safeguarding concerns, these should be recorded on CPOMS Confidential Comment

## Appendix 7

Assignment research topics

Safeguarding considerations for tutors

When designing an assignment on sensitive topics, please ensure that you refer to the awarding body suggestions. Consider when and how students will research these topics.

- Sensitive topics of concern are:
- Health and care topics such as types of abuse
- Terrorist/ Counter terrorism or terror related topics
- Drugs and alcohol
- Weapons
- Violence

This is not an exhaustive list

These topics need careful preparation to ensure that students are searching using the most appropriate websites. Care should be taken to consider providing links to well informed websites that provide a balanced view.

Consider providing suggested websites that have been checked by college staff to ensure that they are relevant.

Check in points with students should be provided to check student's welfare as some of the topics may be of personally sensitive nature and some sources might create trauma.

If students are researching terrorist or terror related topics. It is extremely important to ensure that the sites searched by students are safe and provide relevant information. It is important to discuss with students throughout the research their finding to provide opportunities for students to ask question and be curious around any information that they find. Students need to be supported to become critical independent thinkers.

Students should have a question in mind and know what they are looking for.

What specific information do you want them to find?

Students should be encouraged to evaluate their resources. In particular they also should be courage to spot Fake News. Students should:

Consider the source: Click away from the story to investigate the site, its mission and its contact information

Read beyond: Headlines can be outrageous in an effort to get clicks. What's the whole story?

Check the author: Do a quick search on the author. Are they credible? Are they real?

Supporting sources: Determine if the information given actually supports the story

Check the date: Reposting old stories doesn't mean they are current events.

Check biases: Consider if your own beliefs could affect your judgment.

Ask the experts: Ask a librarian, your teacher or consult a fact checking website.

Having researched online, students may want to share what they have found with others. They should consider the **SHARE** checklist.

- **Source:** Rely on official sources
- **Headline:** Headlines don't always tell the full story
- **Analyse:** Analyse the facts. If something sounds unbelievable it might well be
- **Retouched:** Watch out for misleading pictures or videos, they might be edited or show an unrelated place or event.
- **Error:** Look out for mistakes. Typos and other errors may mean the information is false

## Appendix 8 University of Salford Safeguarding process when attending Bury College

1. University of Salford staff on site are the first port of call should a Safeguarding issue arise.
2. The issue would be reported to the University of Salford Designated Safeguarding Lead (DSL) following Salford processes.
3. If an event occurs that requires immediate First Aid and/or Health & Safety attention, the College will implement practical support as necessary (in line with College processes).
4. Safeguarding issues raised to Salford will be recorded on College systems if deemed necessary following collaboration between University of Salford and Bury College DSLs.
5. Where a safeguarding concern is raised with a Bury College member of staff, that staff member will refer the concern to the Safeguarding Team, following Bury College Safeguarding Policy.
  - If this requires immediate action, the Safeguarding and Prevent Manager will act liaising with the DSL for University of Salford.
  - If the safeguarding concern does not require immediate attention, this will be referred to the DSL for University of Salford.

### Relevant Details

Leanne Kirk is the Uni DSL and the email address is [safeguarding@salford.ac.uk](mailto:safeguarding@salford.ac.uk).

## Appendix 9 Child on Child Sexual Harassment and Sexual Violence

### 1. Introduction & Purpose

Bury College recognises that all students of all ages and all types of provision have a fundamental right to be protected from harm and exploitation and that students cannot learn effectively unless they feel safe and are safe. Where the policy refers to children, this is where research has identified that they are most at risk. It is however acknowledged that anyone of any age could be a victim of these issues. All areas of the policy would be appropriately applied to students of all ages where it is identified that they are a victim or a perpetrator of sexual violence or sexual harassment. The College is committed to ensuring that best practice is adopted when working with all young people and vulnerable adults and that they are supported and protected. The College accepts its legal and moral responsibility to implement procedures, to provide a duty of care to young people and to safeguard their wellbeing and protect them from harm.

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 Keeping children safe in education (KCSIE), all staff working with children are advised to maintain an attitude of '**it could happen here**'.

The college also accepts a legal and moral responsibility to implement procedures, to provide a duty of care to all students who are a victim of sexual harassment and sexual violence.

There is whole college approach to safeguarding, a culture that makes clear that there is a zero-tolerance approach to sexual violence and sexual harassment and that it is never acceptable, and it will not be tolerated. Alongside this policy is a clear action plan to drive forward this approach which includes a strong preventative education programme will help create an environment in which all children at Bury College are supportive and respectful of their peers when reports of sexual violence or sexual harassment are made

### 2. Implementation

It is essential that all concerns / allegations of peer-on-peer abuse are handled sensitively, appropriately and promptly. The way in which they are responded to can have a significant impact on our College environment.

Any response should:

- include a thorough investigation of the concerns / allegations and the wider context in which they may have occurred (as appropriate)
- treat all children involved as being at potential risk; while the child allegedly responsible for the abuse may pose a significant risk of harm to other children, he may also have considerable unmet needs and be at risk of harm himself. The College is committed to ensuring that a safeguarding response is in place for both the child who has allegedly experienced the abuse, and the child who has allegedly been responsible for it, and additional sanctioning work may be required for the latter
- take into account: that the abuse may indicate wider safeguarding concerns for any of the children involved and consider and address the effect of wider socio- cultural contexts, such as the child(ren)'s peer group (both within and outside the college).
- family, the College environment, their experience(s) of crime and victimisation in the local community, and the child(ren)'s online presence. The College must consider what changes may need to be made to these contexts to address the child's/children's needs and to mitigate risk. o the potential complexity of peer-on-peer abuse and of children's experiences and consider the interplay between power, choice and consent. While children may appear to be making choices, if those choices are limited they are not consenting.
- the views of the child/children affected. Unless it is considered unsafe to do so (e.g. where a referral needs to be made immediately), the Designated Safeguarding Lead and/or Safeguarding and Prevent Manager should discuss the proposed action with the child(ren) and



their parents and obtain consent to any referral before it is made. The college will manage the child(ren)'s expectations about information sharing, and keep them and their parents informed of developments, where appropriate and safe to do so.

- 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. It is important to explain that the law is in place to protect children and young people rather than criminalise them, and this should be explained in such a way that avoids alarming or distressing them.

**What should you do if you suspect either that a child may be at risk of or experiencing abuse by their peer(s), or that a child may be at risk of abusing or may be abusing their peer(s)? (See Appendix 1)**

If a student is in immediate danger, or at risk of significant harm, a referral to children's social care (if the student is aged under 18) and / or the police should be made immediately. Anyone can make a referral. **If the DSL is available this should be made by them and staff should refer using the normal safeguarding referral process.**

Where referrals are not made by the DSL, the DSL should be informed as soon as possible that a referral has been made (see the Safeguarding and Prevent Policy). If a member of staff thinks for whatever reason that a child may be at risk of or experiencing abuse by their peer(s), or that a child may be at risk of abusing or may be abusing their peer(s), they should discuss their concern with the DSL and/or Safeguarding and Prevent Manager without delay following the safeguarding referral process so that a course of action can be agreed. If a child speaks to a member of staff about peer-on-peer abuse that they have witnessed or are a part of, the member of staff should listen to the child and use open language that demonstrates understanding rather than judgement (for further details please see the procedure out in the Safeguarding and Prevent Policy).

**How will the College respond to concerns or allegations of peer-on-peer abuse?**

The DSL and/or Safeguarding and Prevent Manager will discuss the concerns or allegations with the member of staff who has reported them and will, where necessary, take any immediate steps to ensure the safety of the child(ren) affected.

DSL and/or Safeguarding and Prevent Manager should always use their professional judgement to determine whether it is appropriate for alleged behaviour to be dealt with internally and, if so, whether any external specialist support is required. In borderline cases the DSL and/or Safeguarding and Prevent Manager may wish to consult with children's social care and / or any other external agencies on a 'no names' basis to determine the most appropriate response. Where the DSL and/or Safeguarding and Prevent Manager considers or suspects that the behaviour in question might be abusive or violent on a spectrum (as opposed to inappropriate or problematic), the DSL should contact the local Safeguarding Children Partnership as well as the Safeguarding Children Partnership(s) in which the student(s) reside immediately, and in any event **within 24 hours** of the DSL and/or Safeguarding and Prevent Manager becoming aware of it. The DSL will discuss the allegations / concerns with the local Safeguarding Children Partnership and the Safeguarding Children Partnership(s) in which the student(s) reside and agree on a course of action, which may include:

- Manage internally with help from external specialists where appropriate and possible. Where behaviour between peers is abusive or violent (as opposed to inappropriate or problematic), should ordinarily apply. However, where support from local agencies is not available, the College may need to handle allegations / concerns internally. In these cases, the College will engage and seek advice from external specialists (in the private and / or voluntary sector).
- Undertake / contribute to an inter-agency early help assessment, with targeted early help services provided to address the assessed needs of a child(ren) and their family. These

services may, for example, include CAMHS, a specialist harmful sexual behaviour team, and / or youth offending services.

- Refer child(ren) to children's social care for a Section 17 (Child in Need) and / or Section 47 (Child Protection) statutory assessment. As a matter of best practice, if an incident of peer-on-peer abuse requires referral to and action by children's social care and a strategy meeting is convened, then the College will hold every professional involved in the case accountable for their safeguarding response, including themselves, to both the child who has experienced the abuse, and the child who was responsible for it, and the contexts to which the abuse was associated.
- Report alleged criminal behaviour to the Police. Alleged criminal behaviour will ordinarily be reported to the Police. However, there are some circumstances where it may not be appropriate to report such behaviour to the Police. For example, where the exchange of youth produced sexual imagery does not involve any aggravating factors. All concerns / allegations will be assessed on a case by case basis, and in light of the wider context.
- Local authority children's social care and the police will be important partners where a crime might have been committed. Referrals to the police will often be a natural progression of making a referral to local authority children's social care. The designated safeguarding lead (or a deputy) should lead the school or college response and should be aware of the local process for referrals to children's social care and making referrals to the police.

Professionals should be alert to the need for early help for a child who:

- is frequently missing/goes missing from education, home or care
- has experienced multiple suspensions, is at risk of being permanently excluded from schools, colleges and in alternative provision or a pupil referral unit
- has a parent or carer in custody or is affected by parental offending.

#### **Youth produced sexual imagery 'Sharing nudes and semi nudes' :**

**IMPORTANT NOTE:** Staff and parents or carers must not intentionally view any nudes and semi-nudes unless there is good and clear reason to do so as outlined below. Wherever possible, responses to incidents should be based on what **DSLs** (or equivalents) have been told about the content of the imagery.

If a decision is made to view imagery, the DSL (or equivalent) would need to be satisfied that viewing:

- is the only way to make a decision about whether to involve other agencies because it is not possible to establish the facts from any child or young person involved
- is necessary to report it to a website, app or suitable reporting agency (such as the IWF) to have it taken down, or to support the child or young person or parent or carer in making a report
- is unavoidable because a child or young person has presented it directly to a staff member or nudes or semi-nudes have been found on an education setting's device or network
- If it is necessary to view the imagery then the DSL (or equivalent) should:
  - never copy, print, share, store or save them; this is illegal. If this has already happened, please contact your local police for advice and to explain the circumstances
  - discuss the decision with the Designated safeguarding lead
  - make sure viewing is undertaken by the DSL (or equivalent) or another member of the safeguarding team or a member of the senior leadership team
  - make sure viewing takes place with another member of staff present in the room, ideally the headteacher or a member of the senior leadership team. This staff member does not need to view the images.
  - wherever possible, make sure viewing takes place on the premises of the education setting, ideally in the headteacher or a member of the senior leadership team's office
  - make sure wherever possible that they are viewed by a staff member of the same sex as the child or young person in the images
  - record how and why the decision was made to view the imagery in the safeguarding or child protection records, including who was present, why the nudes or semi-nudes were viewed and

any subsequent actions. Ensure this is signed and dated and meets any appropriate wider standards e.g. such as those set out in statutory safeguarding guidance and local authority policies and procedures.

- if any devices need to be taken and passed onto the police, the device(s) should be confiscated and the police should be called. The device should be disconnected from Wi-Fi and data, and turned off immediately to avoid imagery being removed from the device remotely through a cloud storage service. The device should be placed in a secure place, for example in a locked cupboard or safe until the police are able to come and collect it.

### **Action following a report of sexual violence and/or sexual harassment.**

The DSL and Safeguarding and Prevent Manager will help inform the college's initial response. The important considerations for this are:

- 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 Bury 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 students 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.

### **All further action will be underpinned with the knowledge that there is a zero-tolerance approach.**

#### **Individual risk and needs assessment**

Where there is an incident of peer-on-peer abuse, the College will carry out a robust risk and needs assessment in respect of each child affected by the abuse. The college will not wait for the outcome or start of external investigations before putting measures in place to protect children from further harm. These risk assessments will:

- assess and address the nature and level of risks that are posed and / or faced by the child
- engage the child's parents and draw upon local services and agencies to ensure that the child's needs are met in the long-term
- consider whether any targeted interventions are needed to address the underlying attitudes or behaviour of any child

- be reviewed at regular intervals in light of the child's on-going needs to ensure that real progress is being made which benefits the child. If at any stage the child's needs escalate, the DSL should contact the local Safeguarding Children Partnership to determine the appropriate course of action.

Actions need to consider measures to be put in place to ensure that in line with previous assessments that where it is identified a risk that the victim is separated from the perpetrator. The risk to other students also needs to be considered. Where the college does not have provision to do this, this may result in suspension or exclusion.

There are four likely scenarios for Bury College 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 Bury College should decide on a course of action. Consideration should be given to whether there are wider cultural issues within Bury 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:

### **Manage Internally**

In some case for example one off incidents, Bury 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.

### **Early Help**

In line with above, Bury 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.

- 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).

### **Referral 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, Bury 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 Bury 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 Bury College takes do not jeopardise a statutory investigation. The risk assessment 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 Bury

College should be **immediate**.

- In some cases, children's social care will review the evidence and decide a statutory intervention is not appropriate. Bury 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.

### **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, Bury 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 Bury 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 Bury 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 Bury 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 Bury College as much as they can (within the constraints of any legal restrictions).

Which ever of the 4 responses are taken, the underpinning principle should be:

- 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).

### **How will the college respond to a report of sexual harassment or sexual violence by an adult learner**

The DSL and Safeguarding and Prevent Manager will help inform the college's initial response. The important considerations for this are:

- 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 Bury 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 anyone involved
- the developmental stages of the children involved;
- any power imbalance. 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 students or school or college staff; and,
- other related issues and wider context, including any links to child sexual exploitation and child criminal exploitation.

The DSL or Safeguarding and prevent manager will support adult learners to make referrals to the police. For vulnerable adults the college may report this on the student's behalf.

### **Disciplinary Action**

Disciplinary action can be taken whilst other investigations by the police and/or children's social care are ongoing. The fact that another body is investigating or has investigated an incident does not itself prevent the college from coming to its own conclusions on the balance of probabilities about what has happened and imposing sanctions accordingly. This should be considered on a case by case basis. The Designated safeguarding lead (Director of Personal Development) should take this role. The college needs to consider that by acting would this prejudice any investigation and/or subsequent prosecution. The DSL will liaise with the police and/or children's social care for advice. The behaviour policy will be implemented alongside.

### **Discipline and support**

Taking disciplinary action and still providing support are not mutually exclusive actions. They can and should occur at the same time if necessary. They can, and should, occur at the same time if necessary. Bury College should be very clear as to what its approach is. On the one hand there is preventative or forward-looking action to safeguard the victim and/or the perpetrator(s), especially where there are concerns that a perpetrator themselves may have been a victim of abuse; and, on the other, there is disciplinary action to punish a perpetrator for their past conduct. Bury College should be very clear as to which category any action they are taking falls or whether it is really both and should ensure that the action complies with the law relating to each relevant category.

Action taken must be recorded in confidential comments in regards to the incidents. Outcome of any disciplinary including the measures of any risk assessments must be recorded in the meeting slots that are visible to all staff. The report should detail whether the allegation is substantiated, unsubstantiated, unfounded, false or malicious.

### **Follow up and support**

#### **Working with parents and carers**

The college will, in most instances, engage with both the victim's and the alleged perpetrator's parents or carers when there has been a report of sexual violence (this **might** not be necessary or proportional in the case of sexual harassment and should be considered on a case-by-case basis). The exception to this rule is if there is a reason to believe informing a parent or carer will put a child at additional risk. Schools and colleges should carefully consider what information they provide to the respective parents or carers about the other child involved and when they do so. In some cases, children's social care and/or the police will have a very clear view and it will be important for Bury College to work with relevant agencies to ensure a consistent approach is taken to information sharing.

**Victim Support:** The college will meet the victim's parents or carers with the victim present to discuss what arrangements are being put in place to safeguard the victim and understand their wishes in terms of support they may need and how the report will be progressed. Adult learners would also be offered on going victim support.

**Perpetrator support:** The college will meet with alleged perpetrator's parents or carers to discuss any arrangements that are being put into place that impact an alleged perpetrator, such as, for example, moving them out of classes with the victim and what this means for their education. The reason behind any decisions should be explained. Support for the alleged perpetrator should be discussed.

### **Recording and reporting**

**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, Bury College, should consider whether any disciplinary action is appropriate against the individual who made it as per their own behaviour policy.

## Preliminary Equality Impact Assessment

<b>Screening for effects on equality</b>	
Name of policy being assessed.	Safeguarding and Prevent Policy
Policy Holder and/or person with authority to make changes to policy:	Sarah Walton
Position:	Assistant Principal Personal Development
Directorate:	Personal Development
New/Revised/Reviewed Policy:	Revised
What is the aim, objective or purpose of the policy, procedure, strategy or decision?	
The aim of the policy is to keep children safe. This is statutory.	
Who was consulted when the policy was first written?	
This policy has been developed over a number of years and is inline with government policy. Feedback has been collected from staff students and external stakeholders.	
Who does the policy affect?	
All staff; students; partners; suppliers; visitors; contractors, local government, police etc	
Who implements the policy, and what steps will be taken to ensure the effective implementation of the policy?	
The policy implementation will be implemented by all staff in the college.	
What pre-existing evidence is available to facilitate the screening of the policy?	
For example: <ul style="list-style-type: none"> <li>• Government policy</li> <li>• Local government</li> <li>• MIS reports</li> <li>• Surveys (staff and students)</li> <li>• Feedback forms</li> <li>• Focus groups</li> <li>• National and local statistics</li> <li>• Census data</li> <li>• Published research</li> <li>• Expert opinion sought</li> </ul>	



## Preliminary Equality Impact Assessment

What impact is the policy likely to have on the following characteristics?					
Protected characteristic*	Positive impact	Negative impact	Neutral impact	Unclear	Further comments
Age (or age group)	✓ <input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Disability	✓ <input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Gender reassignment	✓ <input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Pregnancy and maternity	✓ <input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Race (including ethnicity and nationality)	✓ <input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Religion or belief	✓ <input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Sex	✓ <input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Sexual orientation	✓ <input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Looked after learners	✓ <input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Social-economic	✓ <input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Carers	✓ <input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Ex-offenders	✓ <input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

\*Protected Characteristics as identified by the Equality Act 2010.

**If any answers are 'negative' can any adverse impact be justified on the basis of a legal requirement?**      **Yes**       **No**

**If 'yes', please explain:**

Some adverse impact may be justified on the basis of a legal requirement or applicable exemption including where positive action is undertaken or where there is a conflict with other legislation e.g. health and safety. If this is the case, please explain. A Full Equality Impact Assessment may not need to be completed if justification on this basis can be provided.

# Preliminary Equality Impact Assessment

Please detail any suggested actions identified to improve positive impact or remove negative impact of this policy.

Issue identified	Suggestion action to address this issue
No Issues	

**Should a Full Equality Impact Assessment be carried out?**

No

**If 'yes', is the priority High or Low?** (Based on the number of people to whom the policy applies and the level of impact it is likely to have as a result.)

No

**Please explain the justification of Full Equality Impact Assessment Decision**

Consider all information provided on this form when making a decision about whether a Full Equality Impact Assessment should be carried out.

A full EIA may be required if any of the following apply:-

- a) An adverse impact is identified with regards one or more of the protected characteristics with no legal justification;
- b) An adverse impact is identified with regards one or more of the protected characteristics with no explanation provided about how this may be removed by changes to the policy or the way it is implemented.

**Note:** an adverse impact does not necessarily require action to be taken. Actions must remain in proportion with the benefits that could be achieved and resources available to complete them. If adverse impacts are identified and actions for improvements are not proportionate, the reasons for not taking the action should be detailed and open to challenge.

**How will this policy be approved?**

This policy will be approved by the leadership team.

There is no adverse impact from this policy

**This Preliminary Impact Assessment was checked and signed off by the policy holder:**

<b>Name &amp; Signature</b>	Sarah Walton
<b>Date</b>	12/07/24

Once completed please return (a) a signed hard copy of the form and (b) an electronic version (to be published on the intranet) to .....