

Safeguarding and Prevent Policy

Policy Review Area	Child Protection Policies
Lead Manager	Assistant Principal (Students)
Originated	December 2008
Last updated	October 2015
Reviewed by Board	October 2016
Next Review	October 2017

1. Purpose

City College Brighton and Hove (City College) is committed to ensuring that all our students, staff and visitors are safeguarded and a culture of care, responsiveness and collective responsibility permeates the organisation. This policy focuses on how we keep our students safe from harm, make referrals, recruit and train our staff and deal effectively with allegations against staff. It incorporates a description of a wide range of risks which we need to safeguard against, including those related to the prevention of violent extremism and radicalism.

Throughout this policy, reference is made to 'children and young people'. This term is used to mean those under the age of 18 years old and vulnerable adults up to age of 25. Safeguarding and promoting the welfare of children is defined as:

- Protecting children from maltreatment
- Preventing impairment of children's 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

Reference is also made throughout this policy to 'adults at risk of harm'. Adults at risk of harm are defined as people aged 18 years old and over who may need or receive community care services by reason of mental health or other disability, age or illness and who may be unable to take care of themselves or protect themselves against significant harm or exploitation.

This policy has been developed with reference to 'Working Together to Safeguard Children' (2016) and 'Keeping Children Safe in Education' (2016).

2. Governing Body Responsibilities

The Governing Body at City College abides by their responsibilities as outlined in Keeping Children Safe in Education (2016). Governors also have specific responsibility for ensuring that the College monitors the impact of its work and learns lessons from Serious Case Reviews.

The Governing Body instructs the College to:

- Provide a safe environment for children, young people and adults at risk of harm to learn in
- Ensure the College educates young people regarding the risks of abuse and supports them to develop skills which enable them to protect themselves from the risks
- Identify those who are suffering or are likely to suffer significant harm or who are at risk of radicalisation
- Take appropriate action to see that students are kept safe at the College, and also that disclosures of potential abuse occurring at home or elsewhere are reported appropriately
- Have a system for identifying concerns in relation to the abuse of children, young person and adults at risk of harm and ensure effective methods of responding to disclosures
- Refer concerns that a child, young person or adult at risk of significant harm or potential risk of significant harm to the appropriate referral agents

- Work effectively with others as required by 'Working Together to Safeguard Children (2016)'
- Take into account the inter-agency safeguarding procedure of Brighton & Hove's Safeguarding Children's Board
- Listen to the voice of the child or young person and always act in the best interests of the child or young person
- Appoint a designated member of staff for care experienced students and be aware of individual backgrounds, key workers care arrangements and contacts for care experienced children and young people
- Ensure appropriate and robust safeguarding responses for young people who go missing from College

The Governing Body will approve and annually review policies and procedures and receive regular information relating to safeguarding with the aim of:

- Maintaining awareness of progress across the College and/or issues relating to the welfare of children, young people and adults at risk of harm
- Being reassured by the CEO, Principal and lead manager that systems are in place and are effective in relation to the identification of children, young people and adults at risk of harm and procedures for reporting concerns are widely known
- Ensuring effective procedures for reporting and dealing with allegations of abuse by members of staff or others who come into contact with students through College activity are in place
- Ensuring the College has effective links with statutory agencies such as the Local Children's Safeguarding Board, Multi Agency Support Hub and the Police
- Ensuring safe recruitment of staff and volunteers
- Ensuring the College is fully compliant and pro-active with the requirements of the Prevent Duty (July 2015)
- Ensuring staff are appropriately trained to discharge their duties in relation to safeguarding, including training relating to Prevent

In developing policies and procedures, the Governing Body will take account of guidance issued by the Department for Education, Ofsted and other relevant bodies and groups including Brighton & Hove Safeguarding Children Board, Brighton's Prevent Board and the Home Office.

The CEO, Principal, Governors and all staff working with children, young people and adults at risk of harm will receive adequate training to familiarise them with their safeguarding roles and responsibilities. They will be familiar with College procedures and policies and receive refresher training every year. A senior member of the College Management Team will be the Designated Person with lead responsibility for child and adult protection. They will be the Safeguarding Lead and will be assisted by the Safeguarding Team.

The Governing Body will receive an annual report from the designated safeguarding lead, which reviews how the duties have been discharged.

3. Types of abuse and neglect

The College recognises the following as definitions of abuse for children, young people and adults at risk of harm.

Abuse: a form of maltreatment of a child or young person. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. They may be abused by an adult or adults or another child or children.

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

Emotional abuse: Emotional abuse is the persistent emotional maltreatment of a child, young person or adult at risk of harm such as to cause severe and persistent adverse effects on their emotional development. It may involve conveying to them that they are worthless or unloved, inadequate, or valued only in so far as they meet the needs of another person. It may include not giving them 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 the child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyber bullying), 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, though it may occur alone.

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

Neglect: Neglect is the persistent failure to meet a child or young person's basic physical and/or psychological needs, likely to result in the serious impairment of the child or young person's health or development. Neglect may occur during pregnancy 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. This also applies to adults at risk of harm for whom neglect is an often under reported or challenged concern.

Forced Marriage: This involves a young person or adult at risk of harm being forced into a marriage against their will.

Sexual Exploitation: Child Sexual Exploitation (CSE) involves exploitative situations, contexts and relationships where young people receive something (for example food, accommodation, drugs, alcohol, gifts, money or in some cases simply affection) as a result of engaging in sexual activities. Sexual exploitation can take many forms ranging from the seemingly 'consensual' relationship where sex is exchanged for affection or gifts, to serious organised crime by gangs or groups. What marks out exploitation is an imbalance of power in the relationship. The perpetrator always holds some kind of power over the victim which increases as the exploitative relationship develops. Sexual exploitation involves varying degrees of coercion, intimidation or enticement, including unwanted pressure from peers to have sex, sexual bullying including cyberbullying and grooming. However, it is also important to recognise that some young people who are being sexually exploited do not exhibit any external signs of this abuse.

Child Missing from Education: All children, regardless of their circumstances, are entitled to a full time education which is suitable to their age, ability, aptitude and any special educational needs they may have. A child going missing from education is a potential indicator of abuse or neglect. School and college staff should follow the school's or college's procedures for dealing with children that go missing from education, particularly on repeat occasions, to help identify the risk of abuse and neglect, including sexual exploitation, and to help prevent the risks of their going missing in future. It is essential that all 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.

Female Genital Mutilation Female Genital Mutilation (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. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a girl being at risk of FGM, or already having suffered FGM.

- **Indicators:** There are a range of potential indicators that a girl may be at risk of FGM. Warning signs that FGM may be about to take place, or may have already taken place, can be found on pages 16-17 of the [Multi-Agency Practice Guidelines](#) and Chapter 9 of those Guidelines (pp42-44) focuses on the role of schools and colleges. Section 5C of the Female Genital Mutilation Act 2003 (as inserted by section 75 of the Serious Crime Act 2015) gives the Government powers to issue statutory guidance on FGM to relevant persons.
- **Actions:** If staff have a concern they should activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and children's social care. When mandatory reporting commenced in October 2015 these procedures remained when dealing with concerns regarding the potential for FGM to take place. Where a teacher discovers that an act of FGM appears to have been carried out on a girl who is aged under 18, there will be a statutory duty upon that individual to report it to the police.
- **Mandatory Reporting Duty:** Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a statutory duty upon teachers, along with social workers and healthcare professionals, to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Those failing to report such cases will face disciplinary sanctions. It will be rare for teachers to see visual evidence, and they should not be examining pupils, but the same

definition of what is meant by “to discover that an act of FGM appears to have been carried out” is used for all professionals to whom this mandatory reporting duty applies. The Mandatory reporting duty commenced in October 2015. Teachers are required to report to the police, cases where they discover that an act of FGM appears to have been carried out. Unless the teacher has a good reason not to, they should still consider and discuss any such case with the school’s designated safeguarding lead and involve children’s social care as appropriate.

Preventing Radicalisation Protecting children or young people from the risk of radicalisation should be seen as part of College’s wider safeguarding duties, and is similar in nature to protecting children from other forms of harm and abuse. During the process of radicalisation it is possible to intervene to prevent vulnerable people being radicalised. Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism. There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. It can happen in many different ways and settings. Specific background factors may contribute to vulnerability which are often combined with specific influences such as family, friends or online, and with specific needs for which an extremist or terrorist group may appear to provide an answer. The internet and the use of social media in particular has become a major factor in the radicalisation of young people. As with managing other safeguarding risks, staff should be alert to changes in children’s behaviour which could indicate that they may be in need of help or protection.

Domestic Violence: The Home Office defines domestic violence as "Any incident or pattern of incidents of controlling, coercive or threatening behaviour, violence or abuse between those aged 16 years old 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

Controlling behaviour is: a range of acts designed to make a person subordinate and/or dependent by isolating them from sources of support, exploiting their resources and capacities for personal gain, depriving them of the means needed for independence, resistance and escape and regulating their everyday behaviour. Coercive behaviour is: an act or a pattern of acts of assault, threats, humiliation and intimidation or other abuse that is used to harm, punish, or frighten their victim.

Children or young people who live in households where domestic violence is taking place are seen to be highly vulnerable. There are other forms of abuse or behaviours that put children or young people at risk, the links below provide useful information.

Financial or Material Abuse: This applies to largely adults at risk of harm and relates to circumstances where trust in relation to financial matters is abused. Includes theft, fraud, exploitation, pressure in connection with wills, property or inheritance or financial transactions, or the misuse or misappropriation of property, possessions or benefits.

Anti-Bullying: The College has a separate policy and procedure for Anti-Bullying and Harassment. Bullying someone because of their age, race, gender, sexual orientation, disability and/or transgender will not be tolerated as the College operates a zero tolerance approach. Bullying of this nature is also against the law. Bullying can take many forms and includes:

- **Emotional:** Being excluded, tormented (e.g. hiding things, threatening gestures)
- **Physical:** Pushing, kicking, punching or any use of aggression and intimidation
- **Racial:** Racial taunts, use of racial symbols, graffiti, gestures
- **Sexual:** Unwanted physical contact, sexually abusive comments including homophobic comments and graffiti
- **Verbal:** Name calling, spreading rumours, teasing, 'banter'
- **Cyber:** All areas on internet, such as email and internet, chat room misuse

Mobile threats by text message and calls. Misuse of associated technology i.e. camera and video facilities, sexting.

Below are lists of links that will provide further, expert and up to date information from professional organisations.

[Child Sexual Exploitation \(CSE\)](#)

[Bullying including cyberbullying](#)

[Domestic violence](#)

[Drugs](#)

[Fabricated or induced illness](#)

[Faith abuse](#)

[Female genital mutilation \(FGM\)](#)

[Forced marriage](#)

[Gangs and youth violence](#)

[Gender-based violence/violence against women and girls \(VAWG\)](#)

[Mental health](#)

[Private fostering](#)

[Radicalisation](#)

[Sexting](#)

[Teenage relationship abuse](#)

[Trafficking](#)

4. Designated Staff with Responsibility for Protection from Abuse

Senior Staff Member with Lead Responsibility: The senior designated member of staff with lead responsibility for safeguarding is the Assistant Principal (students), a member of the College's Senior Leadership Team. This includes the promotion of a safe environment for children, young people and adults at risk of harm who are learning within the College or in the workplace. Designated Leads have undertaken up to date training in child protection issues and inter-agency working, as required by the Brighton & Hove's Safeguarding Children Board and will receive refresher training at least every two years. They will remain up to date with developments in child protection and adult safeguarding. The designated senior is also a lead for PREVENT and is a member of the Brighton & Hove Prevent Board.

The designated senior member of staff are responsible for ensuring that:

- Cases of suspected abuse or allegations are appropriately referred to relevant agencies
- Advice and support to staff on issues relating to safeguarding is provided
- A record of any safeguarding referral, complaint or concern is kept, (even where that concern does not lead to a referral)
- Parents/carers/employers of children, young people or adults at risk of harm within the College have access to the College's Safeguarding Policy
- Liaison takes place with host families, employers and training organisations that receive children, young people or adults at risk of harm from the College on long term placements to ensure that appropriate safeguards are put in place
- There is liaison with secondary schools which send pupils to the College to ensure that appropriate arrangements are made for the pupils
- Staff receive basic training in safeguarding and Prevent issues and are aware of the College safeguarding procedures
- Safer recruitment practices are in place
- College works with appropriate partners to safeguard children

The designated senior members of staff will ensure an annual report is provided to the Governing Body of the College setting out how the College has discharged its duties.

Designated Staff Members

Designated members of staff with responsibility for child and adult protection issues are:

Rebecca Conroy, Assistant Principal (Students)	Senior Designated Safeguarding Lead	RC1@ccb.ac.uk
Simon Vincent, Safeguarding Co-ordinator	Designated Safeguarding Lead	SDV@ccb.ac.uk
Alex Bellamy, Lead Student Mentor	Duty Safeguarding Officer	AB1@ccb.ac.uk

These designated staff members collectively:

- Report to the senior members of staff with lead responsibility as appropriate
- Make appropriate referrals
- Liaise with other agencies in our partnership around children, young people and vulnerable adults
- Provide advice and support to other staff on issues relating to protection from abuse
- Have particular responsibility to be available to listen to children, young people and adults at risk of harm studying at the College or in the workplace
- Deal with individual cases, including attending case conferences and review meetings as appropriate
- Undergo appropriate training as required by the Safeguarding Board and receive refresher training at least every two years

Designated Governor

Governors are briefed by the Safeguarding Leads regarding yearly updates to policy and procedure and activity to maintain high standards in relation to safeguarding. The lead governor will have regular updates on safeguarding matters via the Principal's termly report to Corporation and via monthly meetings with the College Designated Safeguarding Leads.

5. What college staff should do if they have concerns about a child or young person

If staff members have concerns about a child they should raise these with the College Safeguarding team. The Safeguarding Lead will decide whether to make a referral to children's social care, but it is important to note that any staff member can refer their concerns to children's social care directly if the Safeguarding Team are unavailable, such as at weekends.

The Department for Education has produced advice [What to do if you are worried a child is being abused 2015- Advice for practitioners](#) to help practitioners identify abuse and neglect and take appropriate action in response.

6. Allegations against members of staff

In all cases where allegations are made against people who may constitute part of the children's workforce, the College will consult with the Local Authority Designated Officer (LADO). They will offer advice regarding appropriate next steps in relation to referral and investigation and ensure that all cases are handled in accordance with safeguarding procedures. Designated staff will have on-going communications with the LADO as part of their safeguarding responsibilities to ensure that College policies and procedures are effective and meet the requirements of current legislation. Members of College staff are people who are in positions of trust (PoT) and therefore any behaviour which may call that position into question will be communicated to the College and acted on. Any investigation into allegations against a member of staff will be carried out in line with the College's Disciplinary and Dismissal Policy and Procedure.

The Chair of Governors will take lead responsibility for overseeing any allegations made against the College's CEO, Principal and COO. Where an allegation is made against the Chair of Governors, the Vice Chair will then take the lead. They are responsible for overseeing the liaison between the LADO, Social Services and/or the Police, in connection with such allegations.

7. Under 18 year olds students housed in host family accommodation

International Students and EFA funded students may wish to access host family accommodation. These arrangements are run and managed through the International Team and are fully compliant with the expectations of the British Council.

The main host family caregiver and host family members over the age of 16 must have full DBS clearance place prior to the start of the placement.

Students under 18 will not be housed with other students over 18 as per British Council Requirements.

A home visit will be undertaken prior to any placement and checks undertaken on fire risks/gas safety.

All host families will be sent the Prevent Duty Guidelines and confirm in writing that they have read and understood the information.

All host families will be provided with a host family provider handbook containing important information about safeguarding, boundaries and duty phone support numbers.

8. Related documents

- Safeguarding Guidelines for Staff
- College Disciplinary and Dismissal Policy and Procedure (Staff)
- Prevent Guidelines for Staff
- Professional Guidelines for Staff
- Equality and Diversity Policy
- Anti-Bullying and Harassment Policy
- Host Family Recruitment Procedure
- Accommodation Provider Handbook