



Safeguarding Child and Vulnerable Adult Protection Procedures

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3.0	Revision	September 2021	Annual KCSiE update.
4.0	Revision	September 2022	Annual KCSiE update.
5.0	Revision	September 2023	Annual KCSiE update.

Monitoring and review

This policy will be reviewed by the Senior Leadership Team and Corporation at least every year, and as required where there are changes in statutory or operational requirements.

Bradford College Local Area Designated Officer

Our Local Area Designated Officer (LADO) is Dawn Holt, Tel 01274 434339/ 01274 435600.

The LADO referral form can be found: <https://saferbradford.co.uk>

Safeguarding Child and Vulnerable Adult Protection Procedures

1 When to use this Procedure

Safeguarding is about protecting the health and wellbeing of children and vulnerable adults, enabling them to live as far as possible free from harm, abuse and neglect. We cannot expect our students, or college, to succeed in the absence of a safe and nurturing environment.

At Bradford College we are committed to safeguarding children and young people and we expect everyone who works at the college to share this commitment.

Adults in our college take all welfare concerns seriously and encourage children and young people to talk to us about anything that worries them. We will always act in the best interest of the child.

It is critical that all staff and others who work with our students are mindful of the risks of harm, which may take many forms, take concerns seriously and act promptly to address any concerns.

2 Definitions

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.

The Safeguarding Child and Vulnerable Adult Protection Procedures document is not designed for managing issues such as day-to-day student behaviour, poor attendance, lost badges and other similar issues. A judgement should be made about whether a student is experiencing, or at risk of, acute or chronic harm.

Bradford College assesses the risks and issues in the wider community when considering the well-being and safety of its students (contextual Safeguarding).

3 Specific Responsibilities Within College

3.1 College Corporation (Governors)

The College Corporation has a statutory duty to make arrangements for ensuring that the college operations are appropriate with a view to safeguarding and promoting the welfare of children (students under 18 years of age attending College) (s175, Education Act 2002). The Corporation is committed to ensuring a safe environment for all students and has designated a Lead Governor(s) with responsibility for Safeguarding. The role of the Lead Governor(s) on safeguarding is to *assure* the safeguarding arrangements rather than to manage them directly. Details of the current Lead Governor(s) is available from the Clerk to the Corporation (email clerk@bradfordcollege.ac.uk).

3.2 Designated Safeguarding Lead (DSL)

The Designated Safeguarding Lead (DSL) is responsible for safeguarding and child protection at Bradford College and reports to the Corporation on safeguarding matters including completion of the college risk register. The key role of the Designated Safeguarding Lead is to:

- oversee referrals from college staff or any others from outside the college;

- work with external agencies and professionals on matter of safeguarding;
- undertake appropriate training;
- raise awareness of safeguarding and child protection amongst the staff and parents;
- ensure that child protection information is transferred to the pupil's new school/college;
- be aware of students who have a social worker; and
- help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues with teachers and college leadership staff.
- work with others to ensure that the college's filtering and monitoring systems and functional and effective.

The Director of People Services is the current Senior Post Holder Designated Safeguarding Lead (DSL) and is accountable for Safeguarding within college. The DSL is the primary link between college and partners in the multi-agency safeguarding arrangements in the Bradford Metropolitan District. The DSL will chair the college safeguarding steering group which will be facilitated by the Safeguarding and Wellbeing Lead Practitioner.

If the DSL is not available, staff should speak to one of their deputies, or where this is not possible to a member of the SLT and/or take advice from local children's social care (KCSIE (2022), paragraph 55).

3.3 Deputy Safeguarding Leads

The Head of Department Student Services, Head of Disability Services and the Safeguarding and Wellbeing Lead Practitioner will deputise for the DSL.

3.4 The Safeguarding and Wellbeing Lead Practitioner

The Safeguarding and Wellbeing Lead Practitioner is responsible for the operational management of, and the ongoing improvement of, safeguarding training and services within college. The Safeguarding and Wellbeing Lead Practitioner will engage with external partners and agencies as determined by the Designated Safeguarding Lead and their deputies.

3.5 Safeguarding and Wellbeing Officers

The team of Safeguarding and Wellbeing Officers support a caseload of students, liaising with external partners and agencies where necessary. The team also maintains current, relevant and accessible safeguarding information resources, including the college website and intranet.

3.6 All College Staff

All staff and volunteers have a duty to be vigilant and aware of the potential for the welfare of students to be compromised. They should know how to act, in accordance with this policy and statutory guidance in response to any concerns that they identify, or that are brought to their attention. They need to complete all mandatory training as part of their induction and ongoing employment with the college.

3.7 Students

Students are expected to fully support and cooperate with policies and actions designed to deliver a safe and nurturing environment within college and in any other college or learning-related setting.

3.8 Responsibility of employers

The college will ensure that employers are aware of their responsibilities in relation to safeguarding students on work experience placements or apprenticeships.

3.9 Governors

Members of the Governing Body of the school must take part in mandatory safeguarding training to ensure that they can 'assure themselves that the safeguarding policies and procedures in place in schools and colleges are effective.' This training is regularly updated. (see KCSIE 2022, paragraph 81.)

Safer recruitment training will be available to all governors who are involved in a College recruitment process.

4 Responding to a Safeguarding Disclosure - Checklist

If a Student informs you that they are experiencing harm/abuse please follow these steps:

1. Respond calmly and sensitively; listen carefully to what they are telling you. Remember that the student has chosen you to make the disclosure to, this is because they trust you and want your support. Please listen to them carefully and do not ask them to stop or say it is not your job.
2. Explain you cannot keep total confidentiality in the case of actual or potential harm and that you may need to speak to the Safeguarding and Wellbeing Team.
3. Do not discuss the disclosure with anyone other than the Safeguarding and Wellbeing Team. It may be appropriate to talk to your line manager in some circumstances, but not as a matter of course.
4. Be clear with the student about who you are sharing information with and when. Keep the student informed of what is happening and ascertain their wishes and feelings where possible. If they then decide not to continue talking to you offer them advice about support helplines and organisations (Appendix 3).
5. Try to find a quiet area to speak where you will not be interrupted. Do not put them off talking by asking them to meet later. Ask the student to explain the facts as clearly as possible but do not ask leading questions, ask open questions when necessary in order to clarify and gather further information.
6. Make a record of what the student has told you using the Cause for Concern form available on the College Intranet. Aim to be objective when reporting the disclosure, including any reference to the disposition of the student.
7. Discuss concerns with the Safeguarding and Wellbeing Team to establish if the concerns are safeguarding issues and what action, if any, needs to be taken.
8. Aim to ensure that the student feels safe in College. Try to ascertain how safe they will be if they leave College or return home and seek advice on any immediate action that may be needed.
9. Following a disclosure or a concern about abuse from a child, no contact should be made with the student's parents or carers without consulting with the Safeguarding and Wellbeing Team. Signs and indicators which may indicate abuse or harm are described in Appendix 1.
10. A student may disclose that another child or adult may be experiencing abuse. You should inform the student that you have a duty to tell the Safeguarding and Wellbeing Team or another relevant person about the incident.

Following your input, you may be contacted by the Safeguarding and Wellbeing Team for further information. If you continue to be concerned about a student after you have informed the Safeguarding and Wellbeing Team, contact the team again to let them know.

*A printable version of this flow chart appears in **Appendix 6**.*

See also **Appendix 4**: Flow chart for raising concerns – process for staff reporting a concern
And **Appendix 5**: Flow chart for students self-referring

5 Information About Specific Concerns

5.1 Physical Injury

Where emergency medical attention is necessary as a result of physical abuse it should be sought immediately, and the Safeguarding and Wellbeing Team must be informed. Where injuries may have been self-inflicted (as a result of self-harm or attempted suicide), contact the Safeguarding and Wellbeing Team. If a referral to Social Services is being made without the parents or carers knowledge and non-urgent medical treatment is required, Social Services should be advised about that fact. Otherwise, the parents/carers should be contacted and the suggestion made that medical attention be sought for the student.

5.2 Allegations of Sexual Abuse

In the event of an allegation of sexual abuse, and where it is deemed the student is at immediate and serious risk of harm (for example if the abuser is a family member with whom the student lives), the Safeguarding and Wellbeing Team will speak with the student and collect relevant information.

Staff, including the Safeguarding and Wellbeing Team, should not speak to the parents or carer of the student without their express consent. In the case of a student over 18 who is not otherwise classed as vulnerable, staff should not make any disclosures to external services without their express consent.

5.3 Allegations of Child Sexual Exploitation (CSE)

The statutory definition of Child Sexual Exploitation (CSE) can be found in the guidance document Child sexual exploitation: Definition and a guide for practitioners (DfE 2017).

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

- in exchange for something the victim needs or wants, and/or
- for the financial advantage or increased status of the perpetrator or facilitator.

The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology.

Indicators of child sexual exploitation may include:

- Acquisition of money, clothes, mobile phones, etc. without plausible explanation;
- Gang-association and/or isolation from peers/social networks;
- Exclusion or unexplained absences from school, college or work;
- Leaving home/care without explanation and persistently going missing or returning late;
- Excessive receipt of texts/phone calls;
- Returning home under the influence of drugs/alcohol;
- Inappropriate sexualised behaviour for age/sexually transmitted infections;
- Evidence of/suspicious of physical or sexual assault;
- Relationships with controlling or significantly older individuals or groups;
- Multiple callers (unknown adults or peers);

- Frequenting areas known for sex work;
- Concerning use of internet or other social media;
- Increasing secretiveness around behaviours; and
- Self-harm or significant changes in emotional well-being.

Although the following vulnerabilities increase the risk of child sexual exploitation, it must be remembered that not all children with these indicators will be exploited. Child sexual exploitation can occur without any of these issues.

Potential vulnerabilities include:

- Having a prior experience of neglect, physical and/or sexual abuse;
- Lack of a safe/stable home environment, now or in the past (domestic abuse or parental substance misuse, mental health issues or criminality, for example);
- Recent bereavement or loss;
- Social isolation or social difficulties;
- Absence of a safe environment to explore sexuality;
- Economic vulnerability;
- Homelessness or insecure accommodation status;
- Connections with other children and young people who are being sexually exploited;
- Family members or other connections involved in adult sex work;
- Having a physical or learning disability;
- Being in care (particularly those in residential care and those with interrupted care histories); and
- Sexual identity.

More information can be found in - Child sexual exploitation: Definition and a guide for practitioners (DfE 2017)

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. It can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity and 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).

The above CCE indicators can also be indicators of CSE, as can:

- children who have older boyfriends or girlfriends; and
- children who suffer from sexually transmitted infections or become pregnant.

5.4 Child Criminal Exploitation (CCE)

CCE occurs where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity:

- in exchange for something the victim needs or wants, and/or
- for the financial or other advantage of the perpetrator or facilitator, and/or
- through violence or the threat of violence.

The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact; it can also occur through the use of technology.

Some of the following can be indicators of CCE:

- children who appear with unexplained gifts or new possessions;
- children who associate with other young people involved in exploitation;
- children who suffer from changes in emotional well-being;

- children who misuse drugs and alcohol;
- children who go missing for periods of time or regularly come home late; and
- children who regularly miss school or education or do not take part in education.

CCE can include children being forced to work in cannabis factories, being coerced into moving drugs or money across the country, forced to shoplift or pickpocket, or to threaten other young people.

5.5 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 Colleges, further and higher educational institutions, pupil referral units, special educational needs Colleges, 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 College), when the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism¹⁰³ 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

5.6 Sexual Assault/Violence (see also 5.20 Child on Child Abuse)

If a student discloses being a victim of a sexual violence or of non-consensual sex the staff member will alert the Safeguarding and Wellbeing Team as soon as possible. If the student is under 18 the matter will be referred to the police.

The student should be encouraged and supported to report this directly to the police; a referral to a local Sexual Assault Referral Centre and any other support services, should be offered. The student if they are under 18 should be encouraged to give permission for College to disclose the matter to parents/carers.

Unless the Safeguarding Team deems at any point that the student, or anyone else connected with the issue, is at an imminent and serious risk of harm, confidentiality should be respected.

A whole new section has been added to KSCIE (2022) related to reports of sexual violence and sexual harassment, including situations where the young person asks the school not to tell anyone about the incident; making referrals against the wishes of the young person; and considering the potential impact of social media breaching confidentiality. Safeguarding staff should consult the guidance outlined in KCSIE (2022) Part Five (page 103) carefully with support of the DSL before sharing any information with third parties.

5.7 Forced Marriage

Forced marriage should not be confused with arranged marriage. A forced marriage is one where violence, threats or any other form of coercion is used to force a person to marry without their full and free consent.

If there are concerns that a student may be in this situation, they can be offered support and advice locally. Safeguarding and Wellbeing staff must make a mandatory report to the Forced Marriage Unit who can offer specialist advice.

Confidentiality is extremely important in these circumstances. Whilst establishing the student's situation, staff should try to ascertain the immediate risk the student is in. In all cases, staff should consult with the Safeguarding Team for action or advice as appropriate. This is particularly important if the student is going overseas imminently.

The Marriage and Civil Partnership (Minimum Age) Act 2022 came into force in February 2023 meaning that 16 and 17 year olds will no longer be allowed to marry or enter a civil partnership, even if they have parental consent. Any concerns that under 18 students may be getting married should be referred to the DSL.

5.8 Domestic Abuse

Note that the correct phrase to use is domestic *abuse*, not domestic *violence*. This is because there are other kinds of domestic abuse, not only violence

In April 2021, the Domestic Abuse Act 2021 received Royal Assent and introduced a statutory definition for the first time:

Definition

The Domestic Abuse Act 2021 (Part 1) defines domestic abuse as any of the following behaviours, either as a pattern of behaviour, or as a single incident, between two people over the age of 16, who are 'personally connected' to each other:

- a) physical or sexual abuse;
- b) violent or threatening behaviour;
- c) controlling or coercive behaviour;
- d) economic abuse (adverse effect of the victim to acquire, use or maintain money or other property; or obtain goods or services); and
- e) psychological, emotional or other abuse.

People are 'personally connected' when they are, or have been married to each other or civil partners; or have agreed to marry or become civil partners. If the two people have been in an intimate relationship with each other, have shared parental responsibility for the same child, or they are relatives.

The definition of Domestic Abuse applies to children if they see or hear, or experience the effects of, the abuse; and they are related to the abusive person.

Paragraph 26 of KCSIE 2022 states 'Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse'.

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child/adolescent to parent violence and abuse. Anyone can be a victim of domestic abuse,

regardless of sexual identity, age, ethnicity, socio-economic status, sexuality or background and domestic abuse can take place inside or outside of the home.

Bradford College has representation on the local Operation Encompass Steering Group, which means we are alerted to incidents of domestic abuse involving the children in our care.

The National Domestic Abuse helpline can be called free of charge and in confidence, 24 hours a day on 0808 2000 247.

All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. 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.

5.9 Female Genital Mutilation

Female genital mutilation (FGM) is a procedure where the female genitals are deliberately cut, injured or changed, but there's no medical reason for this to be done. It's also known as female circumcision or cutting, and by other terms, such as sunna, gudniin, halalays, tahur, megrez and khitan, among others.

FGM is usually carried out on young girls between infancy and the age of 15, most commonly before puberty starts. It is illegal in the UK and is child abuse. It is very painful and can seriously harm the health of women and girls.

Risk factors for FGM include:

- low level of integration into UK society
- mother or a sister who has undergone FGM
- girls who are withdrawn from PSHE
- visiting female elder from the country of origin
- being taken on a long holiday to the country of origin
- talk about a 'special' procedure to become a woman

Symptoms of FGM

FGM may be likely if there is a visiting female elder, there is talk of a special procedure or celebration to become a woman, or parents wish to take their daughter out-of-school to visit an 'at-risk' country (especially before the summer holidays), or parents who wish to withdraw their children from learning about FGM. Staff should not assume that FGM only happens outside the UK.

Indications that FGM may have already taken place may include:

- difficulty walking, sitting or standing and may even look uncomfortable.
- spending longer than normal in the bathroom or toilet due to difficulties urinating.
- spending long periods of time away from a classroom during the day with bladder or menstrual problems.
- frequent urinary, menstrual or stomach problems.
- prolonged or repeated absences from school or college, especially with noticeable behaviour changes (e.g. withdrawal or depression) on the girl's return
- reluctance to undergo normal medical examinations.
- confiding in a professional without being explicit about the problem due to embarrassment or fear.

- talking about pain or discomfort between her legs

It can also cause long-term problems with sex, childbirth and mental health. Where a student under 18 has directly disclosed that they are a victim of FGM this must be considered in the same way as child abuse and reported to social services via the Safeguarding and Wellbeing Team.

The Serious Crime Act 2015 sets out a duty on professionals (including teachers) to notify police when they discover that FGM appears to have been carried out on a girl under 18. In College, this will usually come from a disclosure (unlike in the medical profession where an observation may have been made).

Female Genital Mutilation Reporting Procedures

Where there is a disclosure of FGM it is important that staff know what their statutory response should be. Keeping Children Safe in Education (2022), paragraph 44 says 'whilst **all** staff should speak to the Designated Safeguarding Lead (or deputy) with regard to any concerns about female genital mutilation (FGM), there is a specific **legal duty on teachers**. If a teacher, in the course of their work in the profession, discovers that an act of FGM appears to have been carried out on a girl under the age of 18, the teacher must report this to the police'.

What is often less well-known is what a teacher should do next to make a report.

Below is a very short summary and must be read in conjunction with the mandatory reporting guidance. (See <http://safeguarding.link/fgmreporting>)

The mandatory reporting procedures say:

- 'It is recommended that you make a report orally by calling 101, the single non-emergency number.'
- 'Where there is a risk to life or likelihood of serious immediate harm, professionals should report the case immediately to police, including dialling 999 if appropriate'.

In most cases 'reports under the duty should be made as soon as possible after a case is discovered, and best practice is for reports to be made by the close of the next working day'.

The procedures also set out what information is needed, in order to make a report.

See here: <https://www.gov.uk/government/publications/mandatory-reporting-of-female-genital-mutilation-procedural-information/mandatory-reporting-of-female-genital-mutilation-procedural-information-accessible-version#reporting>

5.10 So-Called Honour-based Abuse

Note that the correct phrase to use is so-called 'Honour-based' abuse, not 'Honour-based' *violence*. This is because there are other kinds of 'Honour-based' abuse, not only violence.

So-called 'honour-based' abuse encompasses 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. All forms of so called HBA are abuse (regardless of the motivation) and should be handled and escalated as such.

Where staff are concerned that a child might be at risk of HBA, they must contact the Designated Safeguarding Lead as a matter of urgency.

Honour-based abuse may be a crime or incident which has been committed to protect or defend the 'honour' of the family or community. It is often linked to family members or acquaintances who mistakenly believe someone has brought shame to their family or community by doing something that is not in keeping with the traditional values of their culture. For example, honour based violence might be committed against people who:

- Become involved with a boyfriend or girlfriend from a different culture or religion
- Want to end an arranged marriage
- Want to escape a forced marriage
- Wear clothes or take part in activities that might not be considered traditional within a particular culture.

5.11 Mental Health

- Bradford College will raise awareness of Mental Health to ensure that all staff are aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.
- College staff are not expected or trained to diagnose mental health conditions or issues, but may notice behaviours that may be of concern.
- Where staff have a mental health concern about a child that may also be a safeguarding concern, they should raise the issue by informing the designated safeguarding lead or a deputy.
- The College will provide opportunities for students to learn about self-care, and promote healthy lifestyles to foster good mental and physical health.

5.12 Online Safety

Students are taught about safeguarding, including online, through various teaching and learning opportunities, as part of providing a broad and balanced curriculum. Students are taught to recognise when they are at risk and how to get help when they need it.

For example:

- Using the drop-in Safeguarding and Wellbeing service
- Contacting appropriate external agencies, e.g. CEOPS
- Contacting the Police

When students use the College network to access the internet, they are protected from inappropriate content by our filtering and monitoring systems. Students are engaging with a range of on-line learning primarily through timetabled sessions led by the tutor. The platforms being used are Moodle, Microsoft Teams, e-stream and Century Tec (Maths & English).

Staff will be aware of the signs and signals of cyberbullying and other risks online and apply the same child-centred safeguarding practices as when children were learning at College. The College continues to ensure appropriate filters and monitors are in place.

College has taken on board the guidance from the UK Safer Internet Centre on safe remote learning and guidance for safer working practice from the Safer Recruitment Consortium. It is extremely important that professional boundaries do not slip during this exceptional period and protocols for home working including online protocols have been issued, these will be reviewed and recirculated periodically:

Staff can access further guidance here:

<https://www.tes.com/news/coronavirus-10-safeguarding-rules-teachers-home>

<https://learning.nspcc.org.uk/news/2020/march/undertaking-remote-teaching-safely/>

<https://www.nspcc.org.uk/keeping-children-safe/online-safety/internet-connected-devices/>

Online Safety is embedded in the College Induction materials.

Although College has monitoring processes in place for onsite Internet use, many students will be accessing the Internet using their own data plan. Information will be made available to Parents and Carers about keeping students safe online with peers, the College, other education offers they may access and the wider internet community.

We have set out the College's approach, including the sites students will be asked to access and set out who from the college (if anyone) their student is going to be interacting with online. Parents have been offered the following links:

- Internet Matters: <https://www.internetmatters.org/> for support for parents and carers to keep their children safe online
- Net-aware: <https://www.net-aware.org.uk/> for support for parents and carers from the NSPCC
- Parent Info: <https://parentinfo.org/> - for support for parents and carers to keep their children safe online
- Thinkuknow: <https://www.thinkuknow.co.uk/> - for advice from the National Crime Agency to stay safe online
- UK Safer Internet Centre: <https://www.saferinternet.org.uk/advice-centre> - advice for parents and carers

Free additional support for staff in responding to online safety issues can be accessed from the Professionals Online Safety Helpline at the UK Safer Internet Centre. Any staff member with concerns about the safety of their student(s) online should raise a Cause for Concern with the Safeguarding and Wellbeing team.

5.12.1 Filtering and Monitoring:

The Senior Leadership Team will ensure that it has appropriate monitoring and filtering in place for college devices and understands that they are responsible for:

- Procuring filtering and monitoring systems;
- Documenting decisions on what is blocked or allowed and why;
- Reviewing the effectiveness of our provision;
- Overseeing system reports;
- Staff training in cyber-security); and
- Any risk management plans for vulnerable children.

Definitions:

Filtering refers to the technology preventing access to harmful or inappropriate content, whilst monitoring refers to the practical steps staff take to ensure harmful or inappropriate access is not made. Monitoring at the college will include:

- Physical monitoring (in the classroom and learning zones);
- Live software monitoring (via the IT Team);
- Monitoring user logs (via the IT Team); and
- Monitoring individual devices.

The college will also ensure that any college devices used away from the college site are also subject to filtering and monitoring procedures. This includes remote access of college systems via the college website.

Each year (at least) our DSL, along with Data Protection Officer and a governor, will review our filtering and monitoring procedures to ensure that they effectively prevent access to harmful or inappropriate content. They will also ensure that the systems we have in place to report any difficulties with the system are understood by all staff and reports are effectively managed.

All our college staff undertake training to understand the risks of poor filtering and monitoring, and know how to share their concerns and will take part in mandatory cybersecurity training.

5.13 Students with SEND

Students with special educational needs or disabilities (SEND) or certain health conditions can face additional safeguarding challenges, these can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration;
- these children being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children;
- the potential for children with SEND or certain medical conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs; and
- communication barriers and difficulties in managing or reporting these challenges

Additional care should be taken to interpret correctly possible signs of abuse and neglect. Any indication of abuse of, or by, these students should be reported in the same way as for other students, according to local established procedures. Where appropriate, the SEND team should be involved.

At Bradford College we provide extra pastoral support and attention for these students, along with ensuring any appropriate support for communication is in place, for example, Communication Support Workers for Deaf students.

Some students with SEND may be especially vulnerable to abuse, or harm, or be less aware that their actions may render them vulnerable. Where abuse is suspected, students or adults who have difficulties in communicating should be given the chance to express themselves to a member of staff with appropriate communication skills and/or be provided with an advocate. Those involved should work with the Learning Support Manager to identify students with SEND and their needs. The College endeavors to create an environment in which students with SEND feel confident and able to discuss these matters.

5.14 Students Who May Present A Risk to Other Students

If a staff member becomes aware or is concerned that a student who is enrolling or already attending College may have been involved in sexual or violent offences, or might otherwise present a significant risk to other students, they should advise the Safeguarding and Wellbeing Team without delay. The Safeguarding and Wellbeing Team will be responsible for contacting relevant external agencies to request further information on a 'need to know' basis, and will liaise with the DSL and college security about the action to be taken.

The initial response will be to place the Student on a 'Planned Learning Break' whilst further information is obtained from internal staff and external partners such as the police and social care. A 'team around the student' meeting may be arranged to discuss concerns. The information collated will be used to undertake a

risk assessment with recommendations for future action. The recommendations will be shared with the DSL, who will make the decision for the student to continue or be suspended, withdrawn or excluded.

Please refer to Section 7 for full procedures relating to Planned Learning Breaks.

The College is committed to its responsibilities under the Rehabilitation of Offenders Act 1974 and will take this into account when assessing risks and appropriate responses.

5.15 Students Aged 14-16 Years

Where students under 16 years old are also enrolled with a secondary school including any Pupil Referral Unit (PRU), the College must liaise with the College or PRU to ensure appropriate arrangements are in place to safeguard the child/young person. Where a child protection concern has presented on College premises, the College Safeguarding and Wellbeing Team must liaise with the College's own Designated Safeguarding Lead. Where the child is an elective home educated pupil the 14-16 manager and the Safeguarding and Wellbeing Team will work with the relevant Education Safeguarding Team Lead.

5.16 Students who have a Social Worker

At Bradford College, we recognise that when a child has a social worker, it is an indicator that the child is more at risk than most pupils. This may mean that they are more vulnerable to further harm, as well as facing educational barriers to attendance, learning, behaviour and poor mental health. We take these needs into account when making plans to support pupils who have a social worker.

- Students with a Social Worker have an allocated Safeguarding Officer who supports and regularly monitors the student's progress during their time at college.
- The Safeguarding Officer contributes to Child Protection, Child in Need, Children Looked After (CLA) Personal Education Plan meetings by giving updates on the student's progression. Teaching staff **MUST** provide the required data to inform these meetings in a timely fashion.
- The Safeguarding Officer acts as the voice of the student and will challenge where appropriate.
- The Safeguarding and Wellbeing Team have designated Welfare Adviser for Care Experienced Children, Children Looked After, Unaccompanied Asylum Seeker Children (UASC) and Young Carers.

5.17 Staff and Volunteers External to College

Where staff or volunteers from external organisations are working with our students, we ensure that the letter of assurance received confirms that the relevant checks are in place, including a current DBS check if the individual is working in regulated activity.

5.18 Prevent (Preventing Violent Extremism)

Section 26(1) of the Counter-Terrorism and Security Act 2015 imposes a duty on all Further Education and Higher Education providers, when exercising their functions, to have due regard to the need to prevent people from being drawn into terrorism. The object is not to prevent students or staff from expressing political or religious views and concerns, but to prevent those views or concerns from being pursued in a violent or extreme way.

The objectives of Prevent are to:

- Tackle the causes of radicalisation and respond to the ideological challenge of terrorism.

- Safeguard and support those most at risk of radicalisation through early intervention, identifying them and offering support.
- Enable those who have already engaged in terrorism to disengage and rehabilitate.

The Prevent strategy covers all forms of terrorism, including far-right extremism and some aspects of non-violent extremism. Young people and vulnerable groups are particularly targeted by groups who may promote extremist activity and the College is committed to supporting students through our Safeguarding practice. Staff are appropriately trained, to ensure all staff have the skills and knowledge to refer any concerns appropriately.

The College will also promote the ethos of the 'Prevent' agenda by encouraging free and open debate but challenging extreme views. We will encourage through classroom practice, themed weeks and induction activities, a belief in Equality and the celebration of Diversity. We will not knowingly host or allow our premises to be used by extreme groups and will prevent the distribution of extreme literature. The College has a legal responsibility to forbid the promotion of partisan political views in the teaching of any subject in the college and must take such steps as are reasonably practicable to ensure that where political issues are brought to the attention of students, they are offered a balanced presentation of opposing views.

Promotion of extremism, by staff or students, is contrary to the values of the College and will constitute misconduct.

Staff should be alert to changes in children's behaviour, which could indicate that they may need help or protection. Staff should use their judgement in identifying children who might be at risk of radicalisation and act proportionately which may include the designated safeguarding lead (or deputy) making a Prevent referral.

Recognising Extremism

Early indicators of radicalisation or extremism may include:

- showing sympathy for extremist causes
- glorifying violence, especially to other faiths or cultures
- making remarks or comments about being at extremist events or rallies outside school
- evidence of possessing illegal or extremist literature
- advocating messages similar to illegal organisations or other extremist groups
- out of character changes in dress, behaviour and peer relationships (but there are also very powerful narratives, programmes and networks that young people can come across online so involvement with particular groups may not be apparent.)
- secretive behaviour
- online searches or sharing extremist messages or social profiles
- intolerance of difference, including faith, culture, gender, race or sexuality
- graffiti, art work or writing that displays extremist themes
- attempts to impose extremist views or practices on others
- verbalising anti-Western or anti-British views
- advocating violence towards others

5.19 Children Missing from Education

Knowing where children are during college hours is an extremely important aspect of safeguarding. Missing college can be an indicator of abuse and neglect and may also raise concerns about others safeguarding issues, including the criminal exploitation of children.

We will monitor attendance carefully and address poor or irregular attendance without delay. The responsibility for this will be with the curriculum management teams.

We will always follow up with parents/carers when learners are not at college. This means we need to have an up to date contact number for a parent/carer for every learner.

In response to the guidance in Keeping Children Safe in Education (2023) the college has:

1. Staff who understand what to do when learners do not attend regularly by using the appropriate college attendance policies and procedures.
2. Appropriate policies, procedures and responses for learners who go missing from education (especially on repeat occasions).
3. Staff who know the signs and triggers for travelling to conflict zones, FGM and forced marriage.
4. Procedures to inform the local authority when we plan to take learners off-roll when they:
 - a. leave school to be home educated;
 - b. move away from the school's location;
 - c. remain medically unfit beyond compulsory school age;
 - d. are in custody for four months or more (and will not return to college afterwards); or
 - e. are permanently excluded.

Where required, we will ensure that any learner who is expected to attend the college, but fails to take up the place will be referred to the local authority.

Where required, when a learner leaves the college, we will record the name of the learner's new school and their expected start date.

14-16 Schools Provision

Within our dedicated 14-16 schools provision we maintain close links with the schools where pupils remain on-roll. We monitor attendance carefully and address poor or irregular attendance without delay.

The staff contact the schools, and parent/carer, the same school day as a student attending the college on schools provision does not attend. We work with the relevant school where the pupils are on roll to ensure all student absence is accounted for, and the reasons understood. We share any intelligence on safeguarding or wellbeing concerns with the school direct and expect the same in return. Close liaison ensures pupils are back attending college at the earliest opportunity.

The 14-16 schools provision in college has their own dedicated Safeguarding & Wellbeing Officer, Family Liaison Officer & Youth Worker, SEND Advisor as well as a Pastoral & Intervention Officer that work with the pupils and the team around the child to provide a safe, positive learning experience for each young person. These staff work together to ensure all matters relating to attendance, punctuality, safeguarding, special education needs and wellbeing are well coordinated – and no child falls through any gaps.

We ensure that pupils who are expected to attend the college on school's provision, but fail to take up the place, will be referred back to the registered school at once, and parents/carers notified.

5.20 Child on Child Abuse

At Bradford College we have a zero-tolerance approach to child on child abuse including sexual violence and harassment. We recognise that it is more likely that females will be victims and males will be perpetrators, but that all child on child abuse is unacceptable and will be taken seriously. We recognise that even if there are no reported cases of child on child abuse, such abuse may still be taking place and is simply not being reported. We are committed to ensuring the college is a safe place and awareness of these issues are raised overtly with learners and staff to ensure understanding and processes for alerting staff. All allegations of harm are taken seriously. For this reason, the college provides specific information and communication channels for students to raise such concerns. These include, but not exclusively:

- Promotional campaigns
- Tutorials, focus groups and workshops
- A drop-in facility
- Specialist training for staff

Child on child abuse should be addressed as a child or vulnerable adult protection concern when there is reasonable cause to suspect that a child or vulnerable adult is suffering, or is likely to suffer, significant harm. Child on child abuse must always be referred to a Designated Person. Staff to be aware that some groups are potentially more at risk. Evidence shows girls and children and young people with SEND and/ or who are LGBTQ+ are at greater risk.

Allegations of child on child abuse will be recorded, investigated and dealt with in line with regular Safeguarding procedures. Cases will be categorised appropriately and reported against.

Victims, perpetrators and any other children affected by child on child abuse will be supported individually by a member of the Safeguarding and Wellbeing team. Support may include, but not exclusively:

- Safety Plans
- Counselling
- Behavioural Contracts
- Restorative practice
- Referral to external organisations, including the Police where a crime has been committed.

Definitions

- **Child:** Those under the age of eighteen
- **Vulnerable Adult:** For the purpose of safeguarding, and the College duty of care, a vulnerable adult is defined as any adult considered to be at risk.
- **Education and Health Care Plan (EHCP):** From September 2014 EHCPs began to replace Statements of special educational needs and Learning Difficulty Assessments from those under the age of 25. An EHCP outlines information about the person including how they communicate, what support they need and what they would like to achieve.
- **Bullying:** Behaviour by an individual or group, repeated over time, that intentionally hurts another individual or group either physically or emotionally. This includes any repeated words or actions, which are aimed at causing someone to feel frightened, miserable and helpless. Bullying can take many forms, including:
 - Verbal, e.g. name calling, sarcasm, threatening & teasing
 - Physical, e.g. pushing, hitting, kicking, punching or any use of physical aggressive contact
 - Social, e.g. ignoring, spreading rumours or treating someone like an outsider
 - Psychological, e.g. stalking and intimidation

Bullying, (including cyber-bullying) can be involved in any type of abuse and is often motivated by prejudice or ignorance due to actual or perceived differences between people or groups or people. People who are LGBTQ+, those from minority ethnic groups, or those with disabilities and/or learning difficulties can be more vulnerable to this form of abuse and the College takes its duty to protect more vulnerable learners very seriously.

- **Cyber-bullying:** ‘Virtual’ bullying using technology (e.g. chat rooms, instant messaging, email & mobile phone) which can occur in or outside College. Cyber-bullying can happen at all times of the day, with a potentially bigger audience, as people can forward on content very quickly and easily. See Online Safety.
- **Harmful Sexual Behaviour:** Refers to sexual behaviours expressed by children and young people that are developmentally inappropriate, may be harmful towards self or others or abusive towards another child, young person or adult. Staff should be aware that harmful sexual behaviour maybe an indicator that the child has been abused. An age or developmental difference should be an indicator of particular concern where behaviour is potentially harmful. Any child or young person who exhibits harmful sexual behaviour may need a safeguarding response and must always be referred to the DSL.
- **Sexting** (sharing nudes or semi-nudes): Whilst professionals refer to the issue as ‘sexting’ there is no clear definition. Many professionals consider sexting to be sending or posting sexually suggestive images, including nude or semi-nude photographs, via mobiles or over the Internet but learners may be more likely to interpret sexting as writing and sharing explicit messages with people they know. Creating, possessing and sharing sexual photos and videos of under-18s, including selfies, is illegal and must be reported to the Police.
- **Harassment:** Any conduct which is unwanted by a learner, which affects the dignity of the learner or group of learners in the College. Harassment may be repetitive or an isolated occurrence against one or more learners
- **Up skirting:** Up skirting 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. Since April 2019 Up skirting has been a criminal offence - Under the Voyeurism Act, up skirting offenders can now be arrested, face up to 2 years in prison and have their name placed on the sex offenders register if caught up skirting. This includes instances where perpetrators say the images were taken just for a laugh.
- **Initiation and ‘hazing’ type rituals:** This could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element.
- **Sexual Harassment:** Sexual harassment means ‘unwanted conduct of a sexual nature’ that can occur online and offline, inside and outside of College. When we reference sexual harassment, we do so in the context of child on child sexual harassment. Sexual harassment is likely to: violate a child’s dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment. 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:
 - Consensual and non-consensual sharing of nudes and semi-nude images and videos. (UKCCIS sexting advice provides detailed advice for schools and colleges);
 - Sharing of explicit content
 - Up skirting
 - Sexualised on line bullying
 - Sexual exploitation; coercion and threats
 - Sexualised online bullying; and
 - Unwanted sexual comments and messages, including, on social media; and Sexual exploitation; coercion and threats.
- **Sexual Violence:** Under the Sexual Offences Act 2003 sexual violence is described as:
 - **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. This includes outside of clothing.
 - **Causing someone to engage in sexual activity without consent:** A person (A) commits an offence if: she / he intentionally causes another person (B) to engage in a n 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.)

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.

- A child under the age of 13 can never consent to any sexual activity
- The age of consent is 16
- Sexual intercourse without consent is rape.

External Guidance

Keeping Children Safe in Education; statutory guidance for schools and colleges, makes it clear that abuse is abuse and should never be tolerated or passed off as ‘banter’ or part of ‘growing up.’

The Equality Act 2010 replaced previous anti-discrimination laws with a single Act. A key provision was a new public sector Equality Duty, which came into force on 5 April 2011. This requires the College to:

- Eliminate unlawful discrimination, harassment, victimisation and any other conduct prohibited by the act
- Advance equality of opportunity between people who share a protected characteristic (age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex and sexual orientation) and people who do not share it
- Foster good relations between people who share a protected characteristic and people who do not share it

Child on child abuse often involves an imbalance of power between the perpetrator and the victim. This could involve perpetrators having control over the relationship which makes it difficult for those they abuse to defend themselves. This imbalance of power can manifest itself in several ways. It may be an age imbalance, physical, psychological (knowing what upsets someone), or social (e.g. isolating or excluding someone). It could also include issues such as revenge porn or what are often gender issues (e.g. girls being touched or boys being involved in initiation activities). It is important to recognise any learner with additional needs, diagnosed and not, will be more vulnerable to this kind of abuse.

Staff responsibilities in dealing with child on child abuse

- All staff must be aware that children and young people are capable of abusing their peers;
- All staff and learners have a responsibility to work together to ensure that abuse does not occur, or where it is found, action is taken;
- Staff must ensure ground rules are set in induction and that learners are made aware of the importance of adhering to fundamental British values (Bradford College UNITED values/principles), what constitutes abuse (including bullying and cyber-bullying) and how any incidents of abuse will be addressed through the Student Behaviour Management Procedure;
- Course leaders/personal tutors for under 18s, and those under the age of 25 in receipt of an EHCP and/or high needs funding, must ensure learners understand how to stay safe from abuse through the mandatory induction and tutorial programme;
- Staff receiving reports of abuse, including incidents that take place off College premises, must take appropriate action to follow up all allegations/incidents and trigger an investigation which will be managed in line with the Student Behaviour Management Procedures. Sanctions against perpetrators may include a planned learning break whilst an investigation takes place through to possible exclusion;
- Staff must ensure appropriate managers are notified. This includes the 14-16 Manager for a learner who is under the age of 16 (e.g. Y10/11) at the start of the academic year and the High Needs Manager for a learner under the age of 25 who is in receipt of an EHCP and/or high needs funding;
- All staff involved must carefully consider the potential impact of the abuse on both the perpetrator/s and the victim/s and refer those involved for additional support from the Safeguarding and Wellbeing team as appropriate. All concerns must be referred to the Safeguarding and Wellbeing team using a cause for concern form.
- The Safeguarding and Wellbeing team and/or DSL will consider referring learners and their parents/carers to other agencies where appropriate. This may include referral to the Multi-Agency Children’s Hub which includes Children’s Social Care and the police;

- All allegations/incidents must be recorded and learners involved told what is being recorded, in what context, and why;
- Any incident of abuse must be discussed with the learners' parents/carers for under 18s and those under the age of 25 in receipt of an EHCP and/or high needs funding, and with the appropriate school where appropriate (for Y10/Y11s) by the 14-16 Manager. (Please see below for exceptions to this rule). An agreement must be reached as to what action should be taken subject to compliance with the Student behaviour management Procedure

Advice for Safeguarding and Wellbeing Officers where sexual violence occurs

The victim may ask College not to tell anyone about the sexual violence or sexual harassment. If the victim does not give consent to share information, staff may still lawfully share it, if it can be justified to be in the public interest, for example, to protect children from harm and to promote the welfare of children. The Designated Safeguarding Lead (or a deputy) should consider the following:

- Parents or carers should normally be informed (unless this would put the victim at greater risk);
- The basic safeguarding principle is: if a child is at risk of harm, is in immediate danger, or has been harmed, the DSL or deputies should be informed.
- Rape, assault by penetration and sexual assaults are crimes. Where a report of rape, assault by penetration or sexual assault against a child is made, this should be reported to the police. Whilst the age of criminal responsibility is ten, if the alleged perpetrator is under ten, the starting principle of referring to the police remains. The police will take a welfare, rather than a criminal justice approach in these cases.
- Where the crime is against an adult, the victim must consent to reporting any crime, and where consent is given, supported to report the crime to the Police themselves.

Useful contacts

- NSPCC Helpline 0808 800 5000
- NSPCC [Harmful Sexual Behaviour](#)
- ChildLine 0800 500 / www.childline.org.uk
- Kidscape www.kidscape.org.uk
- Anti-Bullying Alliance www.antibullyingalliance.org
- Bullying UK www.bullyinguk.org.uk
- Brook [Sexual Behaviours Traffic Light Tool](#)

5.21 Children who are Lesbian, Gay, Bi, or Trans (LGBT)

The fact that a child or a young person may be LGBT is not in itself an inherent risk factor for harm. However, children who are LGBT can be targeted by other children. In some cases, a child who is perceived by other children to be LGBT (whether they are or not) can be just as vulnerable as children who identify as LGBT.

Risks can be compounded where children who are LGBT lack a trusted adult with whom they can be open. It is therefore vital that staff endeavour to reduce the additional barriers faced and provide a safe space for them to speak out or share their concerns with members of staff.

LGBT inclusion is part of the statutory Relationships Education, [Relationship and Sex Education and Health Education](#) curriculum and there is a range of support available to help schools counter homophobic, biphobic and transphobic bullying and abuse.

At Bradford College, we endeavour to reduce the additional barriers faced by providing a safe space for them to speak to by offering a drop-in and self-referral service for students.

6 Managing Investigations Against Staff

At Bradford College we recognise the possibility that adults working for us may harm children, including governors, volunteers, supply teachers, agency staff and contractors. Any concerns about the conduct of adults in the College associated with safeguarding, including inappropriate behaviour or contact, should be taken to the DSL without delay. Any concerns about the DSL should go to the Chair of Governors without delay (email clerk@bradfordcollege.ac.uk). If the DSL is unavailable, then a Deputy DSL should be contacted or the Chief Executive Officer.

Concerns may come from various sources, for example, a 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.

The DSL has to decide whether the concern is an allegation or low-level concern. The term 'low-level' concern does not mean that it is insignificant, it means that the behaviour towards a child does not meet the threshold for referral to the Local Authority Designated Officer (LADO) (see below).

6.1 Allegations

It is an allegation if the person* has:

- behaved in a way that has harmed a child, or may have harmed a child and/or;
- possibly committed a criminal offence against or related to a child and/or;
- behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children; and/or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children (also includes behaviour outside the school).

(*Person could be anyone working in the school or a college that provides education for children under 18 years of age, including supply teachers, volunteers and contractors.)

Allegations should be reported to the LADO 'without delay'.

Before contacting the LADO, schools and colleges should conduct basic enquiries in line with local procedures to establish the facts to help them determine whether there is any foundation to the allegation, being careful not to jeopardise any future police investigation.

The LADO's role is not to investigate the allegation, but to ensure that an appropriate investigation is carried out, whether that is by the police, children's social care, the school or college, or a combination of these.

6.2 Low-level Concerns

Concerns may be graded Low-level if the concern does not meet the criteria for an allegation; and the person* has acted in a way that is inconsistent with the staff code of conduct, including inappropriate conduct outside of work. Example behaviours include, but are not limited to:

- being over friendly with children;
- having favourites;
- taking photographs of children on their mobile phone;
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door; or,
- using inappropriate sexualised, intimidating or offensive language.

If the concern has been raised via a third party, the DSL should collect as much evidence as possible by speaking:

- directly to the person who raised the concern, unless it has been raised anonymously;
- to the individual involved and any witnesses.

Reports about supply staff and contractors should be notified to their employers, so any potential patterns of inappropriate behaviour can be identified.

Staff should be encouraged and feel confident to self-refer, where, for example, they have found themselves in a situation which could be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards.

Low-level concerns should be recorded in writing, including:

- name* of individual sharing their concerns
- details of the concern
- context in which the concern arose
- action taken

(* if the individual wishes to remain anonymous then that should be respected as far as reasonably possible)

Records should be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified.

If a concerning pattern of behaviour is identified and now meets the criteria for an allegation, then the matter should be referred to the LADO.

The records' review might identify that there are wider cultural issues within College that enabled the behaviour to occur. This might mean that policies or processes could be revised or extra training delivered to minimise the risk of it happening again.

The DSL will assign a Case Manager to oversee the investigation process and identify an appropriate investigating officer. Where the allegation is against another student, the case manager will be from Student Services. If the allegation is against the CEO or DSL the case manager will be from the Governors.

The Case Manager will provide the Investigating Officer with:

- Written details of the allegation which will include information about times, dates, location, and names of potential witnesses.
- The written details will be signed and dated by the Safeguarding and Wellbeing Team member who received the allegation and countersigned by the Safeguarding and Wellbeing Lead Practitioner.

The Investigating Officer, in consultation with the Local Authority Designated Officer (LADO), will meet with the subject of the allegation and the alleged victim to establish:

- Whether the allegation concerns harm being caused to a child or adult, is a possible criminal offence, or indicates that an adult may be unsuitable to work with children and/or vulnerable adults.
- Whether the allegation made requires a Children's Social Care Assessment or Adult Protection Assessment and/or a police criminal investigation, or whether it can be dealt with solely via internal College processes.

If the Case Manager and the Designated Officer from the Local Authority agree a referral is appropriate, this will be made by the Case Manager to the LA Designated Officer in a timely manner.

If an external referral is made, the Case Manager will liaise with the external body to agree whether any internal investigation should be suspended pending the completion of the external investigation. Where an

internal investigation is suspended, a risk assessment should be undertaken to ensure the ongoing safety of the student and appropriate support for the subject of the investigation.

If the initial assessment establishes that the allegation is unsubstantiated, the investigation may be concluded at that point subject to approval by the DSL. Sometimes unsubstantiated allegations may be indicative of problems of abuse elsewhere. A record will be kept, and information passed to the LADO, in order that other agencies may act upon the information.

The students or member of staff making the allegation and/or their parents or carers (if under 18 years of age) will be informed of the outcome of the investigation and proceedings. This will occur prior to the return to the College of the member of staff or student, if they are to return.

Allegations against the DSL will be referred to the CEO, who will assume the duties of the DSL. Allegations against the CEO or members of the Governing body will be referred to the Clerk to the Governors who should notify the Chair of Governors, the Safeguarding Lead Governor or another appropriate person. In such circumstances, it will be the responsibility of the Chair of Governors to follow the processes set out above.

6.3 Staff Conduct Outside of College

The guidance in **Keeping Children Safe in Education 2021 (Part Four)** should be followed where it is alleged that anyone working in the College that provides education for children under 18 years of age, including supply teachers and volunteers 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 they may pose a risk of harm to children.
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children.

7 Managing Allegations Against Students

From time to time College staff may be made aware of allegations about a student. This may include, but not exclusively:

- A student making allegations of serious harm or abuse they have suffered where the alleged perpetrator is another student (child on child abuse).
- College becoming aware that a student is under investigation for a serious crime which may present a possible risk to staff or other students.
- College becoming aware that an applicant to the College has a criminal record, currently under investigation by the Police in relation to criminal activity, or otherwise engaged in judicial processes.

Information regarding any of the above may be self-disclosed, received from a parent, carer or from external agencies involved with the student.

7.1 Planned Learning Breaks

All such allegations need to be investigated carefully and thoroughly by the Safeguarding Officer assigned to the case. Care must be taken with these investigations to ensure that any Police investigations are not compromised. In such circumstances it may be required that the student facing the allegations take a 'Planned Learning Break' (PLB) from attendance of the College premises. These measures are intended to

safeguard both the student facing the allegations, and any vulnerable children and adults in College. The decision to impose a PLB must be authorised by the DSL or one of their deputies. The student must be informed both verbally and in writing of any Planned Learning Break from College, and its likely duration. In addition, the following must be actioned:

Action	Staff Responsibility
The case must be risk assessed in order to verify whether a PLB is necessary. Information from the Police may be considered to inform the risk assessment, but ownership of the decision to impose a PLB rests with the DSL and their deputies.	Safeguarding and Wellbeing Lead Practitioner/HOD Student Services/DSL
Where the recommendation is made to impose a PLB, the DSL or their deputy must authorise this.	DSL/Deputies
During the meeting with the student, the conditions of the PLB need to be explained fully, and documented carefully.	Safeguarding and Wellbeing Lead Practitioner/HOD Student Services/DSL
The College ID card will be deactivated and should be returned to College Security for safekeeping for the duration of the PLB.	Safeguarding and Wellbeing Lead Practitioner/HOD Student Services/DSL
The Curriculum Head of Department should be informed of the PLB and will be responsible for communicating this with their teaching staff.	Safeguarding and Wellbeing Lead Practitioner/HOD Student Services/DSL/Curriculum HOD
The Curriculum Head of Department will be responsible for ensuring that the student is enabled to continue with their studies remotely for the duration of the PLB.	Curriculum HOD
The Safeguarding and Wellbeing Team will provide a regular point of contact for the student whilst on the PLB for any pastoral concerns. The frequency of this contact will be negotiated with the student and noted in the documentation.	Safeguarding and Wellbeing Lead Practitioner/HOD Student Services
Where the duration of a PLB is dependent on the outcome of a Police investigation, College will check back regularly with both the Student and the Police on progress with the case.	Safeguarding and Wellbeing Lead Practitioner/Safeguarding and Wellbeing Officer

Where the duration of a PLB is dependent on the outcome of a Police investigation, the PLB will continue until the police investigation and any related court proceedings are complete.

7.2 Applications to College from those engaged in the Criminal Justice System

College may be made aware of applicants who are involved with Criminal Justice processes, for example they may be:

- Under investigation by the Police
- On a curfew, ASBO or wearing an electronic tag
- Currently serving a custodial sentence
- On Probation/involved with Youth Offending Teams
- Holding a conviction which presents a serious Safeguarding risk

College may be made aware of this either through a self-disclosure or through contact with a parent, carer or from external agencies involved with the student, or an external individual. All such allegations need to be investigated carefully and thoroughly by the Safeguarding Officer assigned to the case. Care must be taken with these investigations to ensure that any Police investigations are not compromised. The outcome of these investigations must be risk assessed and carefully documented, and the outcomes of the risk assessments shared in writing with the Admissions Team, applicant and any relevant professional(s).

7.3 Consent to Share Information

Where a student or applicant is involved with external agencies and there is a need to contact these agencies, consent should be sought from the student or applicant to make contact and/or share information. This consent should be confirmed in writing/electronically and fully documented.

7.4.1 Record Keeping

The student safeguarding record keeping process is informed by the College's Data Protection (GDPR) Policy and the Information Records Management Policy.

All safeguarding concerns, discussions and decisions made, and the reasons for those decisions, will be recorded on the College safeguarding electronic recording system, CPOMs by the Safeguarding and Wellbeing Team.

Any member of staff who witnesses or is made aware of a safeguarding issue should, record the incident in detail using the online Safeguarding Concern form, found on the College Intranet. If injuries or marks have been observed which cause concern, these should be recorded on a body map outline, giving an indication of size and whether there is a defined shape to the mark or injury. If a body map outline is required this can be obtained from the Safeguarding and Wellbeing Team.

All Safeguarding Concern forms, body maps and any handwritten notes are to be scanned onto the student's confidential safeguarding record via the CPOMs system. Staff will not take photographs. The Safeguarding and Wellbeing Team duty system will respond to the submission of the form.

Documentation will be retained, even if there is no need to make a referral immediately. These records are stored separately and confidentially; they do not form part of the pupil's general educational records. Confidentiality will be maintained and information relating to individual students and families shared with staff on a strictly need to know basis.

Once a student's safeguarding record has been established, the College will endeavor to get consent to inform parents or carers of this action, unless, following advice, we believe that sharing this information will be a greater risk to the student. The record will be organised chronologically, kept up to date and reviewed at regular intervals. All significant documents, events and actions are captured on this chronology, including outcomes.

When a student moves to a new educational establishment, safeguarding documentation will be passed as soon as possible and confidentially (with consent where required) to the receiving institution, separate from

academic records. Where possible the Safeguarding and Wellbeing Team will oversee the process and be available to discuss the transition with the new establishment if required.

8 Whistleblowing

Where there are concerns about the way that safeguarding is carried out in the school, staff should refer to the College Whistleblowing Policy.

A whistleblowing disclosure must be about something that affects the general public such as:

- a criminal offence has been committed, is being committed or is likely to be committed
- a legal obligation has been breached
- there has been a miscarriage of justice
- the health or safety of any individual has been endangered
- the environment has been damaged
- information about any of the above has been concealed.

The NSPCC runs a whistleblowing helpline on behalf of the government; the number is 0808 800 5000.

Appendix 1: Recognising potential safeguarding issues

A detailed explanation of types of mistreatment and potential indicators may be found in *Keeping children safe in education 2022*.

The following table offers some examples of types of harm and possible indicators. No one indicator is proof of mistreatment and it is possible that an individual may experience different types of harm at the same time.

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. They may be abused by an adult or adults or another child or children.

Types of abuse	Possible Indicators
<p>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.</p>	<ul style="list-style-type: none">• Injuries that are inconsistent with the person's lifestyle• Bruising, cuts, welts, burns and/or marks on the body or loss of hair in clumps• Low self-esteem• Unexplained falls• Mood swings or aggression• Failure to engage

<p>Emotional abuse: the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child’s emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or ‘making fun’ of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child’s developmental capability as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. 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.</p>	<ul style="list-style-type: none"> • Silence when a particular person is present • Withdrawal or change in the psychological state of the person • Insomnia • Low self-esteem • Uncooperative and aggressive behaviour • A change of appetite, weight loss/gain • Signs of distress: tearfulness, anger
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<p>Sexual abuse: involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.</p>	<ul style="list-style-type: none"> • Bruising, particularly to the thighs, upper arms and neck • Bleeding, pain or itching in the genital area • Unusual difficulty in walking or sitting • Infections or sexually transmitted diseases • Uncharacteristic use of explicit sexual language or changes in sexual behaviour • Self-harming • Low self-esteem • Poor concentration, withdrawal, sleep disturbance
<p>Financial e.g. Theft of money or possessions, fraud, scamming; preventing a person from accessing their own money; misuse of benefits or direct payments in a family home; false representation, using another person's bank account, cards or documents</p>	<ul style="list-style-type: none"> • Unexplained lack of money or inability to maintain lifestyle; not socialising • Can't afford public transport • Disparity between the person's living conditions and their financial resources • Low self-esteem • Asking to borrow money
<p>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 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.</p>	<ul style="list-style-type: none"> • Poor physical condition and/or personal hygiene • Low self-esteem • Malnutrition or unexplained weight loss • Untreated injuries and medical problems • Uncharacteristic failure to engage in social interaction • Inappropriate or inadequate clothing

<p>Discriminatory e.g. Verbal abuse or derogatory remarks related to a protected characteristic; denying access to communication aids, not allowing access to an interpreter, signer or lipreader; harassment or deliberate exclusion on the grounds of a protected characteristic, or substandard service provision relating to a protected characteristic</p>	<ul style="list-style-type: none"> • The person appears withdrawn and isolated • Expressions of anger, frustration, fear or anxiety • The support on offer does not take account of the person's individual needs in terms of a protected characteristic • Low self-esteem
<p>Modern day Slavery e.g. Human trafficking; forced labour; sexual exploitation, such as escort work, prostitution and pornography; or being forced to work to pay off debts that realistically they never will be able to</p>	<ul style="list-style-type: none"> • Signs of physical or emotional abuse • Appearing to be malnourished, unkempt or withdrawn • Isolation from the community • Low self-esteem • Always wearing the same clothes • Avoidance of eye contact, appearing frightened or hesitant to talk to strangers • Fear of authority

Appendix 2: Further Information and Support

Safeguarding team contact: safeguarding@bradfordcollege.ac.uk 01274 088999

Additional internal services

Who?	Where?	Contact Details:
Personal Development Team	Ground Floor David Hockney Building	01274 088396
College Security/Campus Liaison	Ground Floor David Hockney Building	01274 088090
Students' Union	David Hockney Building Ground floor	01274 088007
Disability Services and additional Learning support	Third Floor David Hockney Building	01274 088401
External Services:		
Bradford Women's Aid Advice, support and refuge for women and girls fleeing domestic abuse / violence.		For adult support services please contact Survive and Thrive on 0808 200099 For Children and Young Peoples Support Services contact dare2 on 0300 3655020
Staying Put Support for those affected by domestic abuse. Languages: English, Urdu, Punjabi, Hindi, Bengali, Polish and Slovak.		0808 2000 247 W: www.stayingput.uk.net
Victim Support Advice and support for anyone who is a victim of crime.		T: 0808 1689111 W: www.victimsupport.org.uk
Men Standing Up Housing and support to all men who are victims of domestic abuse.		T: 01274 481039 W: www.bradfordcyrenians.org.uk
Bradford Rape Crisis and Survivors Service Advice and support to anyone affected by rape and survivors of sexual abuse.		T: 0808 802999 W: www.rapecrisis.org.uk

<p>Barnardo's Turnaround Service Works with people around CSE and trafficking.</p>	<p>Sir Henry Mitchell House 4 Manchester Road, Bradford, BD5 0QL</p>	<p>www.barnardos.org.uk/barnardo-s-turnaroundservice/service-view.htm?id=1740669967</p>
<p>Hand In Hand Service providing advice and support for males and females up to age 21 involved in CSE.</p>		<p>T: 0300 303 7000 supportercare@childrenssociety.org.uk W: www.childrenssociety.org.uk/hand-in-hand</p>
<p>MyWellbeing A free and confidential NHS service for people aged 16 and over who are registered with a GP in Bradford, Airedale, Wharfedale or Craven.</p>		<p>T: 01274 221234 W: https://www.bdctalkingtherapies.nhs.uk/ E: talkingtherapiesadmin@bdct.nhs.uk</p>
<p>In a Crisis:</p>		
<p>Accident & Emergency Department Any medical or mental health emergency.</p>	<p>Bradford Royal Infirmary Duckworth Lane Bradford BD9 6RJ</p>	<p>T: 01274 542200</p>
<p>Bradford Council Social Care Support Children and adults at risk of harm.</p>		<p>Under 18's T: 01274 435600 T: 01274 437500 Out of hours emergencies T: 01274 431010 Adults T: 01274 435400 Out of hours emergencies T: 01274 431010</p>
<p>Bradford NHS First Response This service is for people of all ages living in Bradford, Airedale, Craven or Wharfedale experiencing a mental health crisis.</p>		<p>T: 01274 221181</p>
<p>NHS Choices 111 is the NHS nonemergency number. It's fast, easy and free. Call 111 when you need medical help fast but it's not a 999 emergency.</p>		<p>T: 111</p>
<p>Samaritans 24-hour helpline. Talk to us any time you like, in your own way, and off the record – about whatever's getting to you. You don't have to be suicidal.</p>	<p>6 Mornington Villas Manningham Bradford BD8 7HB Usually open for walk ins 11am-10pm</p>	<p>T: 01274 547547 (local call rates) T: 116 123 (free call) T: 08457 909090 (local call rates) E: jo@samaritans.org</p>

Appendix additions 2020:

- Appendix 4: Flow chart for students making a self-referral
- Appendix 5: Flow chart for raising concerns – process for staff reporting a concern
- Appendix 6: Responding to a Disclosure

Appendix 3: Links to further information and guidance

Keeping children safe in education: for Colleges and colleges

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/835733/Keeping_children_safe_in_education_2019.pdf

Working together to safeguard children

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/779401/Working_Together_to_Safeguard-Children.pdf

Child sexual exploitation: definition and guide for practitioners

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/591903/CSE_Guidance_Core_Document_13.02.2017.pdf

Information sharing: advice for practitioners providing safeguarding services

<https://www.gov.uk/government/publications/safeguarding-practitioners-information-sharing-advice>

Preventing and tackling bullying

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/623895/Preventing_and_tackling_bullying_advice.pdf

Sexual violence and sexual harassment between children in Colleges and colleges

<https://www.gov.uk/government/publications/sexual-violence-and-sexual-harassment-between-children-in-Colleges-and-colleges>

Multi-agency statutory guidance on female genital mutilation Department for Education, Department of Health and Social Care, and Home Office

<https://www.gov.uk/government/publications/multi-agency-statutory-guidance-on-female-genital-mutilation>

United Nations Convention on the rights of the child

<https://www.gov.uk/government/publications/united-nations-convention-on-the-rights-of-the-child-uncrc-how-legislation-underpins-implementation-in-england>

What to do if you're worried a child is being abused: advice for practitioners

<https://www.gov.uk/government/publications/what-to-do-if-youre-worried-a-child-is-being-abused--2>

Student Self -Referral Process:

Need to talk/ self-refer?

We will listen
and believe you



We will not judge you



We will make sure you receive the right
support from us or other agencies



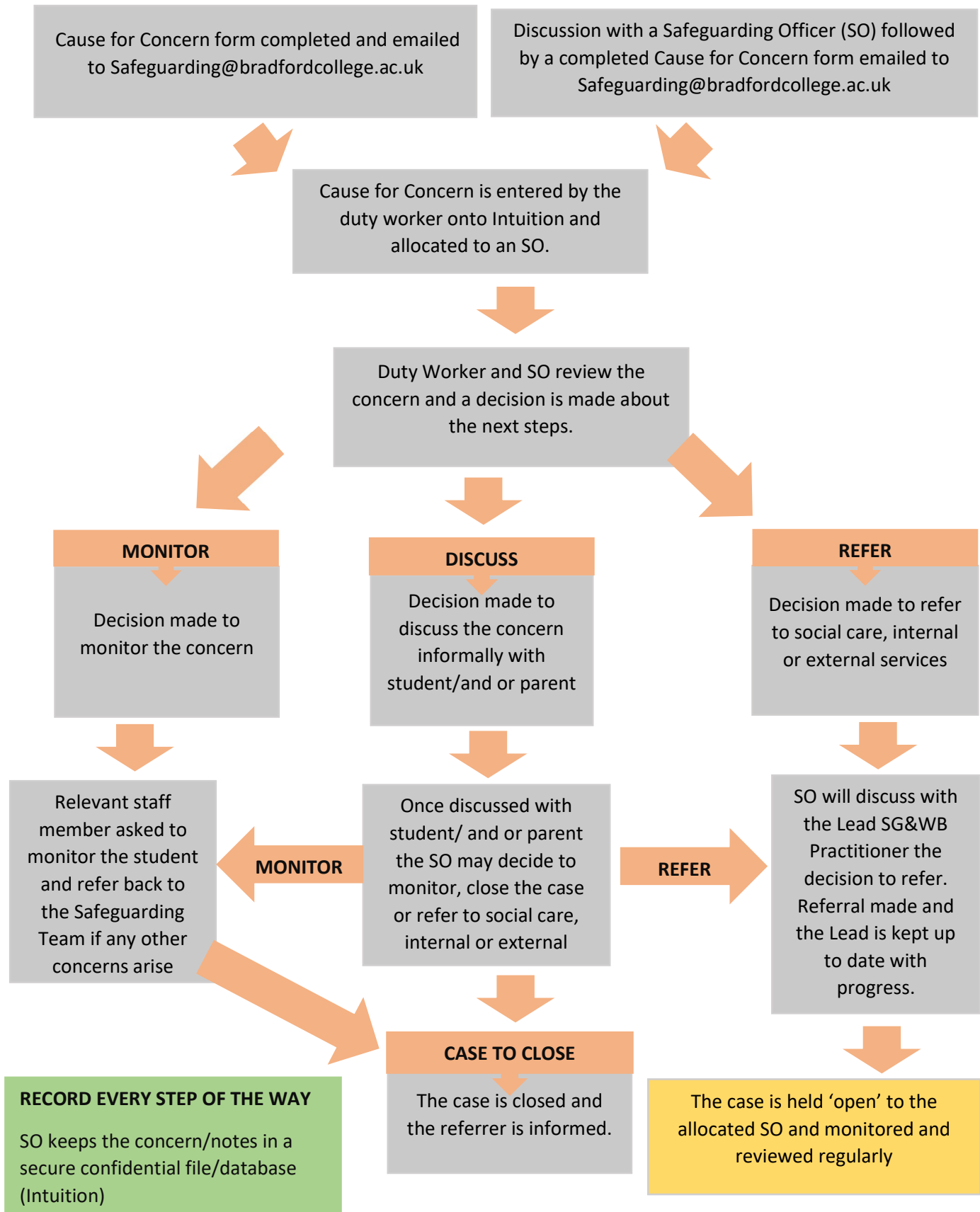
We will only share information with
the relevant people

If you are worried or have a concern you can speak with any member of staff at College and they will help.

Or you can contact the Safeguarding and Wellbeing Team on 01274 088999 or email safeguarding@bradfordcollege.ac.uk or wellbeing@bradfordcollege.ac.uk

Appendix 5: Flow chart for raising concerns – process for staff reporting a concern

Flow chart for raising concerns about a student



Appendix 6 – Bradford College Process

Bradford College

Responding to a Safeguarding Disclosure – Quick Reference Guide

If a Student begins to disclose a potential Safeguarding issue to you please use the following steps as a guide:

- 1 • Respond calmly and sensitively; listen carefully to what they are telling you. Remember that the student has chosen you to make the disclosure to, this is because they trust you and want your support. Please listen to them carefully and do not ask them to stop or say it is not your job.
- 2 • Explain you cannot keep total confidentiality in the case of actual or potential harm and that you may need to speak to the Safeguarding and Wellbeing Team.
- 3 • Do not discuss the disclosure with anyone other than the Safeguarding and Wellbeing Team. It may be appropriate to talk to your line manager in some circumstances, but not as a matter of course.
- 4 • Be clear with the student about who you are sharing information with and when. Keep the student informed of what is happening and ascertain their wishes and feelings where possible.
- 5 • Try to find a quiet area to speak where you will not be interrupted. Do not put them off talking by asking them to meet later. Ask the student to explain the facts as clearly as possible but do not ask leading questions, ask open questions when necessary in order to clarify and gather further information.
- 6 • Make a record of what the student has told you using the Cause for Concern form available on the College Intranet. Aim to be objective when reporting the disclosure, including any reference to the disposition of the student.
- 7 • If at all unsure, discuss your concerns with the Safeguarding and Wellbeing Team to establish if the concerns are safeguarding issues and what action, if any, needs to be taken.
- 8 • Aim to ensure that the student feels safe in College. Try to ascertain how safe they will be if they leave College or return home and seek advice on any other immediate action that may be needed.
- 9 • Following a disclosure or a concern about abuse from a child, no contact should be made with the student's parents or carers without consulting with the Safeguarding and Wellbeing Team first.
- 10 • A student may disclose that another child or adult may be experiencing abuse. You should inform the student that you have a duty to inform the Safeguarding and Wellbeing Team.

Following your input, you may be contacted by the Safeguarding and Wellbeing Team for further information. If you continue to be concerned about a student after you have informed the Safeguarding and Wellbeing team contact them again to let them know.

Safeguarding Duty Desk: (01274 08)8999
safeguarding@bradfordcollege.ac.uk