

SAFEGUARDING – CHILDREN AND ADULTS PROCEDURE

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SCOPE

These procedures relate to all forms of abuse, being drawn into terrorism and significant harm.

Purpose

This procedure aims to promote the welfare of Dudley College of Technology students, staff and other relevant persons, with particular reference to the safeguarding of children and vulnerable adults from abuse, significant harm or being drawn into terrorism.

Introduction

This procedure aims to promote the welfare of Dudley College of Technology students, staff and other relevant persons, with particular reference to the safeguarding of children and vulnerable adults from abuse, significant harm or being drawn into terrorism.

- Children Act 1989
- Children Act 2004
- Education Act 2002
- Education and Training (Welfare of Children) Act 2021
- Working Together to Safeguard Children (July 2018)
- Keeping Children Safe in Education (2024): Statutory guidance for schools and colleges
- Dudley Safeguarding People Partnership (DSPP) – Safeguarding Children Procedures
- Counter-Terrorism and Security Act 2015 section 26 also known as the Prevent Duty
- Female Genital Mutilation Act 2003 (Section 74 of the Serious Crime Act 2015) -
- Information Sharing (2018)

Whilst every attempt has been made to cover a wide range of situations it is recognised that this procedure may not cover all eventualities.

All safeguarding concerns are reported via CPOMS.

I. Governing Body Responsibilities

The governing body is committed to ensuring that the college:

- Ensures all staff who work with children and vulnerable adults understand their responsibility for safeguarding.
- Provides a safe environment for children and vulnerable adults to learn in.
- Identifies children and vulnerable adults who are suffering, or likely to suffer, significant harm.
- Identifies students at risk of being drawn into terrorism.
- Takes appropriate action to see that such students are kept safe at the college.

In pursuit of these aims, the governing body will approve and annually review policies and procedures with the aim of:

- Ensuring the college comply with their duties under legislation.
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- Raising awareness of issues relating to the welfare of children and vulnerable adults and the promotion of a safe environment for children and vulnerable adults learning within, or visiting, the college.
- Aiding the identification of children and vulnerable adults at risk of significant harm and providing procedures for reporting concerns.
- Establishing procedures for reporting and dealing with allegations of abuse against members of staff, Associates or Volunteers.
- The safe recruitment of staff.

2. Children and Adults at Risk – Definitions

CHILD - A child is classified as a person under 18 years of age.

ADULTS AT RISK - A vulnerable adult is any person aged 18 or above, 'Who is, or may be in need of Community Care Services by reason of mental or other disability, age or illness; and is or may be unable to take care of themselves, or unable to protect themselves from significant harm or exploitation.'

3. Safeguarding – Protecting Individuals from Harm/Being Drawn into Terrorism

All staff should be aware of the indicators of abuse and neglect. This is vital in being able to identify when a student is in need of protection. Further information can be found in the [Keeping children safe in education 2024 \(publishing.service.gov.uk\)](https://www.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/123456/keeping-children-safe-in-education-2024.pdf) publication produced by the Department of Education.

Abuse: a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused by other children or adults, in a family or in an institution or community setting by those known to them or, more rarely by others.

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.

Emotional Abuse: the persistent emotional maltreatment of a child such as to cause severe or 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 the other person. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Sexual Abuse: forcing or enticing a child or young person to take part in sexual activities, not necessarily involving violence, whether or not the person 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 also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Females can also be abusers as can other children.

The sexual abuse of children by other children is a specific safeguarding issue (also known as child-on-child abuse) in education and **all** staff should be aware of it.

Neglect: persistent failure to meet a child or young person's basic physical and/or psychological need, likely to result in the serious impairment of health or development. Neglect may involve a parent or carer failing to provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional 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. **All** staff should be aware that child sexual and child criminal exploitation are forms of child abuse.

SPECIFIC SAFEGUARDING ISSUES INCLUDE:

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

Online Safety: It is important that children and vulnerable adults are safeguarded from potentially harmful and inappropriate online material. An effective whole college approach to online safety will support the college to protect and educate learners and staff in their use of technology and establishes mechanisms to identify, intervene in, and escalate any concerns where appropriate. Issues classified within online safety are considerable, but can be categorised into four areas of risk

Content: being exposed to illegal, inappropriate or harmful content, for example; pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, ideological causes of terrorism and extremism.

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Conduct: personal online behaviour that increases the likelihood of, or causes, harm:

for example, making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography sharing other explicit images and online bullying.

Commerce: risks such as online gambling, inappropriate advertising, phishing and financial scams.

Child Sexual Exploitation and Child Criminal Exploitation: Both CSE and CCE are forms of abuse that occur when an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into taking part in sexual or criminal activity, in exchange for something the victim needs or wants and/or financial advantage or increased status of the perpetrator or facilitator and/or through violence or threat of violence. CSE and CCE can affect children both male and female and can include children who have been moved, commonly referred to as trafficking, for the purpose of exploitation.

Child Criminal Exploitation: Some specific forms of CCE can include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shop lifting or pickpocketing. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others.

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

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

Child Sexual Exploitation: Is a form of child sexual abuse. Sexual abuse may involve physical contact, including assault penetration or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside clothing. It may include non-contact activities, such as involving children in production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse including via the internet.

CSE can occur over time or be a one-off occurrence and may happen without the child's immediate knowledge for example through others sharing videos or images of them on social media.

County Lines is a term used to describe gangs and organized 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 forms of 'deal line'. Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to move (and store) drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and

weapons to ensure compliance of victims. Children can be targeted and recruited into county lines in a number of locations including schools (mainstream and special), further and higher educational institutions, pupil referral units, special educational needs schools, children's homes and care homes. Children are also increasingly being targeted and recruited online using social media. Children can easily become trapped by this type of exploitation as county lines gangs can manufacture drug debts which need to be worked off or threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

Any concerns regarding the above will be reported in line with local authority procedures and staff will recognise that learners are victims and should be supported as such.

Serious Violence: All staff should be aware of the indicators, which may signal children are at risk from, or are involved with, serious violent crime. These may include increased absence from college, a change of friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation.

Domestic Abuse: The Domestic Abuse Act 2021 introduces the first ever statutory definition of domestic abuse and recognises the impact of domestic abuse on children, as victims in their own right, if they see, hear or experience the effects of abuse. The statutory definition of domestic abuse, based on cross-government definition, ensures that different types of relationship are captured, including ex- partners and family members. The definition captures a range of different abusive behaviours, including physical, emotional and economic abuse and coercive and controlling behaviour. Under the statutory definition, both the person who is carrying out the behaviour and the person to whom the behaviour is directed towards must be aged 16 or over and they must be "personally connected" (as defined in Section 2 of the 2021 Act).

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 sexual abuse can take place inside or outside of the home.

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. Experiencing domestic abuse and/or violence can have a serious and 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.

Young people can also experience domestic abuse in their own intimate relationships. This form of child-on-child abuse is sometimes referred to as "teenage relationship abuse". Depending on the age of the young people, this may not be recognised in law under the statutory definition of "domestic abuse" (if one or both parties are under 16). However, as with any child under 18, safeguarding procedures should be followed and both young victims and young perpetrators should be offered support.

Honour-Based Abuse (HBA): encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation (FGM), forced marriage and practices such as breast ironing.

Abuse committed in the context of preserving “honour” often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take. All forms of HBA are abuse (regardless of motivation) and should be handled and escalated as such.

Female Genital Mutilation: FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences. Whilst all staff should speak to the designated safeguarding lead (or deputy) with regard to any concerns about female genital mutilation (FGM), Section 5B of the Female Genital Mutilation Act 2003 (as inserted by Section 74 of the Serious Crime Act 2015) places a statutory **duty upon teachers**, along with regulated health and social care professionals in England and Wales, to report to the Police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out a girl under the age of 18.

Teachers must personally report to the Police cases where they discover that an act of FGM appears to have been carried out.

Unless the teacher has good reason not to, they should still consider and discuss any such case with the college’s designated safeguarding lead (or deputy) and involve children’s social care as appropriate.

The duty does not apply in relation to at risk or suspected cases (i.e. where the teacher does not discover that an act of FGM appears to have been carried out, either through disclosure by the victim or visual evidence) or in cases where the woman is 18 or over. In these cases, teachers should follow the college’s safeguarding procedures.

Mental Health: All staff should be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Education staff, however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one. Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences (ACEs), this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children’s experiences, can impact on their mental health, behaviour, and education.

Preventing Children and at risk Adults becoming terrorists or supporting terrorism: Children are vulnerable to extremist ideology and being drawn into terrorism. Similar to protecting children from other forms of harms and abuse, protecting children from this risk should be a part of a schools’ or colleges’ safeguarding approach.

Extremism is the promotion or advancement of an ideology based on violence, hatred or intolerance that aims to:

1. Negate or destroy fundamental rights and freedoms of others, or undermines,

overturn.

2. Replace the UK's system of liberal parliamentary democracy and democratic rights.
3. Intentionally create a permissive environment or other so achieve the results in (1).

Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.

Terrorism is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

There is no single way of identifying whether a child is likely to be susceptible to an extremist ideology. Background factors combined with specific influences such as family and friends may contribute to a child's vulnerability. Similarly, being drawn into terrorism can occur through many different methods (such as social media or the internet) and settings (such as within the home). However, it is possible to protect vulnerable people from extremist ideology and intervene to prevent those at risk of being drawn into terrorism. As with other safeguarding risks, staff should be alert to changes in children's behaviour, which could indicate that they may be in need of help or protection. Staff should use their judgement in identifying children who might be at risk of being drawn into terrorism and act proportionately which may include the designated safeguarding lead (or deputy) making a Prevent referral.

The Prevent Duty

All schools and colleges are subject to a duty under section 26 of the Counter- Terrorism and Security Act 2015 (the CTSA 2015), in the exercise of their functions, to have "due regard to the need to prevent people from being drawn into terrorism". This duty is known as the Prevent duty.

Channel

Channel is a voluntary, confidential support programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. Prevent referrals may be passed to a multi-agency Channel panel, which will discuss the individual referred to determine whether they are vulnerable to being drawn into terrorism and consider the appropriate support required. A representative from the school or college may be asked to attend the Channel panel to help with this assessment. An individual's engagement with the programme is entirely voluntary at all stages.

Child on Child Abuse (Peer on Peer (Adults)): Children can abuse other children. This can happen both inside and outside of college and online. The college has zero-tolerance for child-on-child abuse. Staff must challenge inappropriate behaviour between peers and not dismiss this as 'banter', "just having a laugh" or "part of growing up" or "boys being boys". Staff who have any concerns about child-on-child abuse should speak to the designated safeguarding lead (or deputy).

The different forms child on child abuse can take include:

- Bullying including cyber-bullying, prejudice-based and discriminatory bullying.

- Abuse in intimate personal relationships between children (sometimes known as “teenage relationship abuse”).
- Sexual violence such as rape, assault by penetration and sexual assault; (this may include an online element which facilitates, threatens and/or encourages sexual violence).
- Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse.
- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery).
- Upskirting which typically involves taking a picture under a person’s clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress and alarm physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse).
- Initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

Sexual Violence: It is important that College staff are aware of sexual violence and the fact children can, and sometimes do, abuse their peers in this way and it can happen both inside and outside of college. Some groups may be more at risk such as girls, children with special educational needs and disabilities (SEND) and LGBT children. Dudley College maintains an “it could happen here approach”.

When referring to sexual violence we are referring to sexual offences under the Sexual Offences Act 2003.

Rape – A person (A) commits an offence of rape if: there is intentional penetration of 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 his / her 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.

Sexual assault covers a very wide range of behaviour so a single act of kissing someone without consent or touching someone’s bottom/breasts/genitalia without consent, can still constitute sexual assault.

Causing someone to engage in sexual activity without consent: A person (A) commits an offence if: s/he intentionally causes another person (B) to engage in an activity, the activity is

sexual, B does not consent to engaging in the activity, and A does not reasonably believe that B consents. (This could include forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.

Sexual Harassment:

When referring to sexual harassment we mean “unwanted conduct of a sexual nature” that occur online and offline and both 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.

This 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 brushing against someone, interfering with someone’s clothes (sexual violence should be considered here along with the experience of the victim), displaying pictures photos or drawings of a sexual nature.
- Online sexual harassment, this may be standalone or part of a wider pattern of sexual harassment and/or sexual violence and may include:
 - consensual and non-consensual sharing of nude or semi-nude images and/or videos
 - sharing unwanted explicit content
 - upskirting (a criminal offence)
 - sexualised online bullying
 - unwanted sexual comments and messages
 - sexual exploitation, coercion or threats

The college will treat any reports of Sexual Violence or Sexual Harassment seriously and all staff should maintain an attitude of “it could happen here”. The college will respond to all reports and concerns of sexual violence and sexual harassment whether this takes place in college or outside of college.

Serious Violence: All staff should be aware of the indicators, which may signal children are at risk from, or are involved with, serious violent crime. These may include increased absence from college, a change of friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation.

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

4. CHILDREN WHO GO MISSING FROM EDUCATION

All staff should be aware that children going missing, particularly repeatedly, can act as a vital sign of a range of safeguarding possibilities. This may include abuse and neglect, which may include sexual abuse or exploitation and can also be a sign of child criminal exploitation including involvement in county lines. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation, “honour”-based abuse or risk of forced marriage. Early intervention is essential to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child going missing in future.

Where possible, our College will hold a minimum of 2 emergency contact numbers for each student. It is good practice to have sufficient contact details to enable a responsible adult to be contacted where concerns have been identified during the College day. Local authority reporting guidelines will be followed where a child is missing from education or is removed from the College roll.

Dudley College of Technology will demonstrate that reasonable enquiries to ascertain the whereabouts of children will have been taken when there is an attendance / believed missing issue.

5. CONTEXTUAL/EXTRA-FAMILIAL SAFEGUARDING

Safeguarding incidents and/or behaviours can be associated with factors outside the College and/or can occur between children outside the College. Staff should consider the context within which such incidents and / or behaviours occur. Assessments of children should consider whether wider environmental factors are present in a child’s life that are a threat to their safety or welfare. Children’s social care assessments should consider such factors, so it is important that the College provides as much information as possible as part of the referral process. This will allow any assessment to consider all the available evidence and the full context of any abuse. (Contextual Safeguarding – An overview of the operational, strategic and conceptual framework. Carlene Firmin November 2017).

6. STAFF RESPONSIBILITIES

6.1 SENIOR STAFF MEMBER WITH LEAD RESPONSIBILITY

The Vice Principal Curriculum and Standards, Diana Martin, is the Senior Designated Safeguarding Lead and is a member of the senior leadership team with lead responsibility for safeguarding.

The Safeguarding Lead has a key duty to take lead responsibility for raising awareness within the staff body of issues relating to the welfare of children and adults, and the provision of a safe environment for the children and vulnerable adults learning within the College.

The Senior Designated Safeguarding Lead has received training in safeguarding issues,

including the prevent duty and inter-agency working, as required by the Dudley Safeguarding People Partnership (DSPP), and will receive refresher training at least every 2 years. They should keep up to date with developments in safeguarding issues.

The designated senior member of staff is responsible for:

- Overseeing the referral of cases of suspected abuse or allegations to the relevant agencies to include being drawn into terrorism.
- Providing advice and support to other staff on issues relating to safeguarding.
- Maintaining a central record of any safeguarding referrals, complaint or concern (even where that concern does not lead to a referral).
- Ensuring that parents/guardians and carers of children and vulnerable adults within the college are aware of the college's Safeguarding Policy and Prevent Strategy.
- Liaising with the DMBC Directorate of Children's Services, the Dudley Safeguarding People Partnership, Security and Partnerships Officer or other appropriate agencies.
- Carrying out specific safeguarding risk assessments where appropriate, for example for those students identified as being on the Sex Offenders' Register or have a conviction/offence relating to a serious crime.
- Ensuring that all relevant staff with responsibility for children aged 14-16 liaise with the relevant Local Authority or secondary school which sends pupils to the college to ensure that appropriate arrangements are made.
- Ensuring that those students who are "looked after" or "leaving the care" of the Local Authority are identified and regular contact is maintained with the relevant external agencies and specific support put in place.
- Ensuring that appropriate in-house and external safeguarding training is delivered and facilitated as relevant and appropriate to each member of staff's job role.
- Will deal with individual cases, including attending case conferences and review meetings as appropriate.

The Senior Designated Safeguarding Lead will provide a termly report to the governing body of the college setting out how the college has discharged its duties. The Senior Designated Safeguarding Lead will meet regularly with the lead governor for safeguarding, Valerie Little, to review staff training and processes within safeguarding.

The Senior Designated Safeguarding Lead is responsible for reporting deficiencies in procedures or policies identified by the DSPP (or others) to the governing body at the earliest opportunity.

6.2 OTHER DESIGNATED STAFF MEMBERS WITH RESPONSIBILITIES

Other designated members of staff with specific responsibility for safeguarding issues:

- Designated Safeguarding Lead, Davina Foy.
- Deputy Designated Safeguarding Lead, Gemma Salisbury.
- Safeguarding and Counselling Assistant – Emma Louise Fage.
- Other staff who are DSL trained – Jacqueline Ladak, Tammy Bragg, Sarah Pardoe, Susan Thornton, Carol Ross, Katie Whitehouse, Louise Jones, Claire Millard, Rachel Corns, Samantha Jocelyn-Sears, Luke Baker.
- Duty Managers.
- Assistant Principal – SEND, Cross College Support and Safeguarding, Lynn Glazzard.

Designated Safeguarding Lead will:

- Act as a central point of contact for enquiries and, liaising with line managers, other staff and external agencies, deal with issues relating to student safeguarding.
- Respond to concerns raised by staff in a timely manner to ensure students are safeguarded.
- Escalate any high-level safeguarding concerns to the Senior Designated Safeguarding Lead or Chief Executive Officer as appropriate.
- Oversee the case management of the Deputy Designated Safeguarding Lead and support other staff who are DSL trained.
- Ensure that all safeguarding records are centrally created and maintained.
- Attend multi-agency meetings including Child Protection Conferences.

Deputy Designated Safeguarding Lead will:

- Act as a central point of contact for enquiries and, liaising with line managers, other staff and external agencies, deal with issues relating to student safeguarding.
- Liaise with the Designated Safeguarding Lead on concerns they are dealing with.
- Respond to concerns raised by staff in a timely manner to ensure students are safeguarded.
- Deputise for the Designated Safeguarding Lead as required including at multi- agency meetings.
- Support the Designated Safeguarding Lead with ensuring central safeguarding records are maintained and accurate.

Other staff who are DSL trained will:

- Offer support to the Designated Safeguarding Lead and Deputy Safeguarding Lead in dealing with low level safeguarding concerns.
- Act as a point of contact for safeguarding concerns when Designated Safeguarding Leads are unavailable.
- Escalate safeguarding concerns to Designated Safeguarding leads as appropriate
- Support the Designated Safeguarding Lead in ensuring central safeguarding records are maintained and accurate.

The Duty Managers will:

- In the first instance report any safeguarding issues.
- Have received training in safeguarding issues and inter-agency working, as required by the DSPP. Received fast moving incident training.

The Assistant Principal will:

- Oversee the work of the Designated Safeguarding Lead
- Update policy and procedure in line with legislation, as required.

6.3 ALL STAFF – RESPONSIBILITIES

- All staff have a mandatory obligation to familiarise themselves with this procedure and other relevant documents, see the various links in this document. All staff should particularly pay due regard to part one of https://assets.publishing.service.gov.uk/media/66d7301b9084b18b95709f75/Keeping_children_safe_in_education_2024.pdf.
- All staff working with children and adults at risk are expected to undertake safeguarding training regularly and receive safeguarding updates and briefings at least annually.

7. DEALING WITH SAFEGUARDING ISSUES RELATING TO STUDENTS

7.1 Over 16s who make a disclosure

When a student 16 or over (but not those on a Youth Skills or School Links programme) makes a disclosure to any member of staff, that person should report the concern on CPOMS.

7.2 14-16 Pathways/School Links

- In the event that a student studying either on a 14-16 Pathways or a Schools Link programme makes a disclosure, the member of staff should alert Designated Safeguarding Lead who will liaise with the relevant Local Authority, Head Teacher or Children's Services representative as soon as practicable.
- Where a Prevent issue is brought to the attention of the college, this should be logged onto CPOMS and the Safeguarding Team contacted.

7.3 Under 16s or vulnerable adults who are 'visiting' rather than learning at the College

All persons should be aware that Dudley College of Technology does not normally provide child minding facilities on college premises. To this end there should be no children under the age of 16 years of age on college premises unsupervised i.e. it is not acceptable for parents, siblings or others (whether they be students, staff, visitors, contractors or any other category of person) to bring children under the age of 16 years of age onto college premises, whilst they themselves are in class or elsewhere, and their child(ren) are left unsupervised in libraries, canteens or any other college area. In unavoidable circumstances staff who have no alternative but to bring children under 16 years of age or vulnerable adults onto college premises must first obtain line manager agreement, using relevant procedure [“Children or Vulnerable Adults \(non- students\) on college premises”](#) and form [Staff Request to bring children under 16 years of age/Vulnerable Adults \(non-students\) onto College Premises \(QS/122\)](#).

In the event that a child under the age of 16 years or a vulnerable adult is discovered unsupervised on college premises, Security and the Duty Manager must be immediately

advised and the form “[Unsupervised Safeguarding Notice of Concern, ref \(QS/123\)](#)” be completed.

8. DEALING WITH SAFEGUARDING ISSUES RELATING TO STAFF, ASSOCIATES OR VOLUNTEERS

8.1 Introduction

These procedures apply to all staff, whether teaching, administrative, management or support, as well as to Associates (including agency staff) and volunteers. The word “staff” is used for ease of description.

Because of their frequent contact with children and vulnerable adults, staff may have allegations of abuse, including radicalisation, made against them. The college recognises that an allegation of abuse made against a member of staff may be made for a variety of reasons and that the facts of the allegation may or may not be true. It is imperative that those dealing with an allegation maintain an open mind and that initial fact finding and any subsequent investigations are thorough and not subject to delay.

The college recognises that the Children Act 1989 states that the welfare of the child is the paramount concern. It is also recognised that hasty or ill-informed decisions in connection with a member of staff can irreparably damage an individual’s reputation, confidence and career. Therefore, those dealing with such allegations within the college will do so with sensitivity and will act in a careful, measured way.

8.2 Receiving an Allegation (Internal)

A member of staff who receives an allegation about another member of staff should report it immediately to the Senior Designated Safeguarding Lead unless the Senior Designated Safeguarding Lead is the person against whom the allegation is made, in which case the report should be made to the CEO/College Principal or the designated Governor. The CEO/College Principal (or designated Governor, if the allegation is against the CEO/College Principal) should:

Obtain written details of the allegation from the person who received it, that are signed and dated. The written details should be countersigned and dated by the Senior Designated Safeguarding Lead (or designated person).

The Senior Designated Safeguarding Lead should record information about times, dates, locations and names of potential witnesses.

8.3 Initial Assessment by the Senior Designated Safeguarding Lead (or designated person)

The Senior Designated Safeguarding Lead (or designated person) should make an initial assessment of the allegations, consulting with the CEO/College Principal, the Designated

Governor, Director of Human Resources and the DSPP, or Security and Partnership Officer as appropriate. Where the allegation is considered to be a potential criminal act, a potential transferable risk or indicates that the child has suffered, is suffering or is likely to suffer significant harm, the matter should be reported immediately to the DSPP via the Designated Officer (Managing Allegations) formerly LADO or Security and Partnership Officer.

It is important that the Senior Designated Safeguarding Lead (or designated person) does not investigate the allegation. The initial assessment should be on the basis of the information received and provide a basis for a decision whether or not the allegation warrants further investigation.

Potential outcomes are:

The allegation represents inappropriate behaviour or poor practice by the member of staff and is neither potentially a crime nor a cause of significant harm to the child. The matter should be addressed in accordance with the college's disciplinary procedures.

The allegation represents a transferable risk where the member of staff has behaved in a way that indicates they may not be suitable to work with children.

The allegation can be shown to be false because the facts alleged could not possibly be true.

The outcome of the initial findings may result in temporary suspension, see Section 12 below.

8.4 Receiving an Allegation (External)

Inter-agency working means that the college may, from time to time, receive Safeguarding enquiries from the DSPP, Security and Partnerships Officer, Social Services or the Police.

The safeguarding/Prevent agencies, including the police, have no power to direct the college to act in a particular way; however, the college should assist the agencies with their enquiries.

The college shall hold in abeyance its own internal enquiries while any formal police or social services investigations proceed; to do otherwise may prejudice the investigation

If there is an investigation by an external agency, for example the police, the Senior Designated Safeguarding Lead (or designated person) should normally be involved in, and contribute to, the inter-agency strategy discussions. The Senior Designated Safeguarding Lead (or designated person) is responsible for ensuring that the college gives every assistance with the agency's enquiries. They will ensure that appropriate confidentiality is maintained in connection with the enquiries, in the interests of the member of staff about whom the allegation is made, and act on the advice of the external agency. When the external investigation has been completed the college may receive advice on an appropriate course of action.

Providing there are no objections from the police or other investigating agency, the Senior Designated Safeguarding Lead (or designated person) shall:

Inform the member of staff against whom the allegation was made that an investigation is taking place and what the likely process will involve.

Inform the Chair of Governors and/or the designated governor of the allegation and the investigation.

Ensure that the parent/guardian/carer of any child or vulnerable adult named in any allegation is informed and what the likely process will involve.

Keep a written record of the action taken in connection with the allegation.

9. SUSPENSION OF STAFF

Suspension should not be automatic. In respect of staff other than the CEO/College Principal, suspension can only be carried out by a member of the Executive Leadership Team or in exceptional circumstances an Assistant Principal. In respect of the CEO/College Principal or Senior Post Holder, suspension can only be carried out by the Chair of Governors (or in his/her absence, the Vice Chair).

Suspension may be considered at any stage of the investigation. It is a neutral, not a disciplinary act and shall be on full pay. Consideration should be given to alternatives; paid leave of absence; agreement to refrain from attending work; change of, or withdrawal from, specified duties.

Suspension should only occur for a good reason. For example:

- Where a child or vulnerable adult may be at risk.
- Where the allegations are sufficiently serious to justify dismissal on the grounds of gross misconduct.
- Where necessary for the good and efficient conduct of the investigation.

If suspension is being considered, the member of staff should be encouraged to seek advice, for example from a trade union.

Prior to making the decision to suspend, the Senior Designated Safeguarding Lead (or senior member of staff or Chair or Vice Chair of Governors) should interview the member of staff. This should occur with the approval of the appropriate agency. In particular, if the police are engaged in an investigation, the officer in charge of the case should be consulted.

The member of staff should be advised to seek the advice and/or assistance of his/her trade union and should be informed that they have the right to be accompanied by a friend at the interview. The member of staff should be informed that an allegation has been made and that consideration is being given to suspension. It should be made clear that the interview is not a formal disciplinary hearing, but solely for raising a serious matter which may lead to suspension and further investigation.

During the interview, the member of staff should be given as much information as possible, in particular the reasons for any proposed suspension, provided that doing so

would not interfere with the investigation into the allegation. The interview is not intended to establish the member of staff's innocence or guilt, but provides the opportunity for the member of staff to make representations about possible suspension. The member of staff should be given the opportunity to consider any information given to him/her at the meeting and prepare a response, although any adjournment may be brief.

If the Senior Designated Safeguarding Lead (or senior member of staff or Chair or Vice Chair of Governors) considers that suspension is necessary, the member of staff shall be informed that he/she is suspended from duty. Written confirmation of the suspension, with reasons, shall be despatched as soon as possible and ideally within one working day.

Where a member of staff is suspended, the CEO/College Principal (or senior member of staff or Chair or Vice Chair of Governors) should note that:

- The Chair of Governors should be informed of the suspension in writing.
- The Governing Body should receive a report that a member of staff has been suspended pending investigation; the detail given to the governing body should be minimal.
- Where the CEO/College Principal has been suspended, the Chair or Vice Chair of Governors will need to take action to address the management of the college.
- The parents/carers of the child or vulnerable adult making the allegation should be informed of suspension. They should be asked to treat the information as confidential.
- Consideration should be given to informing the child or vulnerable adult making the allegations of the suspension.
- Senior staff who need to know of the reason for the suspension should be informed.
- If they are an agency member of staff, then the relevant senior member of staff in the agency will be informed.
- Depending on the nature of the allegation, the CEO/College Principal should consider with the nominated Governor whether a statement to the students of the college and/or parents/carers should be made, taking due regard of the need to avoid unwelcome publicity.

The CEO/College Principal shall consider carefully and review the decisions as to who is informed of the suspension and investigation. The DSPP, Security and Partnerships Officer and external investigating authorities should be consulted.

The suspended member of staff should be given appropriate support during the period of suspension. He/she should also be provided with information on progress and developments in the case at regular intervals.

The suspension will remain under review in accordance with the college disciplinary procedures.

Following full investigation, including the involvement of external agencies where relevant, possible outcomes might be dismissal, or a lesser sanction such as disciplinary action, the Discipline-Staff procedure provides more information.

10. DISCIPLINARY ACTION

There are times when an investigation into a safeguarding or radicalisation allegation against a member of staff results in disciplinary action.

The disciplinary investigation should be conducted in accordance with the existing staff disciplinary procedures. The college can use the outcome of external agency enquiries as part of its own procedure.

The member of staff should be informed of:

- The disciplinary charge against him/her;
- His/her entitlement to be accompanied or represented by a trade union representative or friend.
- Where the member of staff has been suspended and no disciplinary action is to be taken, the suspension should be lifted immediately and arrangements made for the member of staff to return to work. It may be appropriate to offer counselling.

The young person or vulnerable adult making the allegation and/or their parent/guardian/carer should be informed of the outcome of the investigation and proceedings. This should occur prior to the return to college of the member of staff (if suspended).

The Senior Designated Safeguarding Officer and the CEO/College Principal should give consideration as to what information should be made available to the general population of the college.

11. ALLEGATIONS WITHOUT FOUNDATION

Obviously false allegations may be indicative of problems of abuse elsewhere. A record should be kept and consideration given to referral to the DSPP or Security and Partnerships Officer in order that other agencies may act upon the information.

In consultation with the designated Governor, the Senior Designated Safeguarding Lead shall:

- Inform the member of staff against whom the allegation is made orally and in writing that no further disciplinary or safeguarding action will be taken. Consideration should be given to offering counselling/support.
- Inform the parents/carers of the alleged victim of the outcome.
- Where the allegation was made by a child other than the alleged victim, consideration to be given to informing the parents/carers of that child.
- Prepare a report outlining the allegation and giving reasons for the conclusion that it had no foundation and confirming that the above action has been taken.

12. RECORDS

It is important that documents relating to an investigation are retained in a secure place,

together with a written record of the outcome and, if disciplinary action is taken, details retained on the member of staff's personal and confidential file and a copy provided to the member of staff. This record should be retained until the staff member has reached normal retirement age or for a period of 7 years from the date of the allegation if that is longer.

If a member of staff is dismissed or resigns before the disciplinary process is completed, he/she should be informed about the college's statutory duty to inform the Disclosure & Barring Service (DBS) and the Senior Designated Safeguarding Lead should ensure this is done.

Details of allegations that are found to be malicious should be removed from personnel records.

13. LEARNING LESSONS

Where an allegation has been made against a member of staff, the nominated Governor, together with the Senior Designated Safeguarding Lead should, at the conclusion of the investigation and any disciplinary procedures, consider whether there are any matters arising from it that could lead to the improvement of the college's procedures and/or policies. Consideration should also be given to the training needs of staff.

14. ADDITIONAL INFORMATION

Guidance for safer working practice for those working with children and young people in education settings – February 2022.

[Keeping children safe in education 2024 \(publishing.service.gov.uk\)](https://www.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/106422/keeping-children-safe-in-education-2024.pdf)

Sexual violence and sexual harassment between children in schools and colleges

15. ASSOCIATED DOCUMENTS

- POL-001 – Acceptable Use of IT – Student
- POL-002 – Staff IT (formerly Acceptable Use of Internet/Intranet for Staff and Contract Personnel)
- POL-005 – Equality and Diversity
- POL-006 – Fitness to Study
- POL-010 – Learner Involvement
- POL-015 - Risk Management
- POL-016 – Safeguarding
- POL-019 – Social Media
- POL-028 – Data Protection (formerly Information Security) CCOPI – Professional Code of Conduct
- Anti-Bullying (Students)
- Behaviour Management
- How We Support our Learners (formerly Caring for the Learner)
- Children or Vulnerable Adults (non-students) on College Premises Counselling

- Discipline – Staff
- Conduct – Students
- Drugs (Illegal) and Prohibited Substances External Speaker
- Recruitment and Selection Restraint
- Staff, Associate and Governor Safeguarding and Prevent Training Suicidal Intentions (Disclosure of)
- Tutoring of Learners
- Whistleblowing
- SS003 – Student Mental Health
- SS004 – Learner Work Experience
- SS010 – Lone Working
- SS011 – Risk Assessment
- Prevent Radicalisation/Extremism Strategy