

SAFEGUARDING CHILDREN AND VULNERABLE ADULTS POLICY

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1 Introduction

- 1.1. This policy should be read in conjunction with the safer recruitment of staff, and the safeguarding and external contractor’s procedures.
- 1.2. South Thames Colleges’ Group is committed to safeguarding and promoting the welfare of children and vulnerable adults and to ensuring that action is taken to support them if they are at risk of significant harm. . Safeguarding and promoting the welfare of children is **everyone’s** responsibility. **Everyone** who comes into contact with children and their families has a role to play. The Group requires all staff, governors, volunteers and those contracted to provide services should consider at all times what is in the best interests of the child or vulnerable adult.
- 1.3. The Group requires all staff to demonstrate high standards in their management of risk and in the active protection of children and vulnerable adults from discrimination and avoidable harm. Staff are required to fulfil their duties for young people under 18 in accordance with Keeping Children Safe in Education (DfE, 2018), The Prevent Strategy and Duty (HM Government, 2015) and support vulnerable adults in accordance with the National framework of standards for safeguarding adults, (ADSS, 2005).
- 1.4. The Group recognises that the welfare of the learner is paramount and that all learners regardless of age, disability, gender, ethnic origin, religious belief, sexual orientation or identity have the right to protection from all types of harm or abuse. Working in partnership with children, vulnerable adults, their parents, carers and other agencies is essential in promoting the welfare of individuals.
- 1.5. This policy should be read in conjunction with individual College’s safeguarding procedures.

2 Purpose and principles

- 2.1. The purpose of this policy is to provide a framework that informs procedures relating to the College’s legal obligations to safeguard and protect children and vulnerable adults who are suffering forms of abuse or are at risk of radicalisation.

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Policy Title: Safeguarding Children & Vulnerable Adults Policy	Staff Member Responsible: Vice Principal – Head of College
Version: Final	Review Date: August 2019

- 2.2. This policy provides clear direction to all members of the college community to ensure child protection and vulnerable adult concerns, referrals and monitoring of actions are handled sensitively, professionally and in ways that promote the welfare of the learners and support their needs e.g. learners are encouraged to talk and are listened to. The policy also makes a commitment to the development of good practice and sound procedures.
- 2.3. Accordingly, all staff receive a copy of this policy and are required to read and be familiar with 'Keeping Children Safe in Education' 2018 (Appendix 1), and undertake regular refresher training.
- 2.4. The following principles underpin the application of this policy:
 - 2.4.1. The Group follows the statutory guidance 'Working Together to Safeguard Children' (DfE, 2016) which covers the legislative requirements and expectations on individual services to safeguard and promote the welfare of children. Schools and colleges must have regard to this guidance when carrying out their duties to safeguard and promote the welfare of children; along with non-statutory guidance 'What to do if you are worried a child is being abused' (HM Government, March 2015) and 'Information Sharing: advice for practitioners providing safeguarding services' (DfE, March 2015).
 - 2.4.2. Safeguarding also covers vulnerability to violent extremism and the specific need to safeguard children and young people from potential radicalisation. Section 26 of the Counter Terrorism and Security Act, 2015 places a duty on colleges to have "due regard to the need to prevent people from being drawn into terrorism".
 - 2.4.3. Safeguarding also encompasses issues such as learner health and safety, bullying, arrangements to meet medical need, provision of first aid, college security, access to and use of information technology.
 - 2.4.4. The Group's policy and procedures for safeguarding mirror Local Authority Safeguarding Children Board Child Protection Procedures and are based upon the London Child Protection Procedures and Practice Guidance (5th Edition 2016, <http://www.londoncp.co.uk>) and the Local Authorities Multi Agency Adult Protection Policy, Guidelines and procedures.

3 Scope

- 3.1. The policy applies to all learners, governors, staff and volunteers working for the College in all locations where education and training is delivered to children and vulnerable adults. It applies also to those situations where learners are in a workplace setting undertaking vocational training or studying for vocational qualifications. The policy also covers collaborative provision and staff employed directly by contractors supplying services on behalf of the College.
- 3.2. Safeguarding and promoting the welfare of children is defined in KCSE 2018 as:
 - 3.2.1. Protecting children from maltreatment
 - 3.2.2. preventing impairment of children's health or development
 - 3.2.3. ensuring that children grow up in circumstances consistent with the provision of safe and effective care
 - 3.2.4. taking action to enable all children to have the best outcomes

3.3. A 'child' is defined as a person aged up to 18. 'Keeping Children Safe in Education' 2018 recognises the additional vulnerabilities of 'looked after children' and care leavers. The Children Act 2004 also covers vulnerable adults with a disability up to the age of 25. A vulnerable adult is defined as "a person aged 18 or over who is, or may be in need of community care services by reason of mental or other disability, age or illness; and who is or may be unable to take care of him/herself, or unable to protect themselves against significant harm or exploitation" (Safeguarding Vulnerable Groups Act 2006).

4 Main Elements

4.1. The 3 main elements of the Policy are to:

Prevent

- 4.1.1. Raise awareness of child protection issues amongst all staff and volunteers and of what to do if they have concerns
- 4.1.2. Provide training for all staff to proactively engage in preventing radicalisation and extremism, as part of the Government's "Prevent" strategy
- 4.1.3. Ensure that all adults within the College who have access to children, young people and vulnerable adults have been subject to appropriate checks using safer recruitment practices
- 4.1.4. Maintain and review a central record of DBS checks and comply with the duty of employers to inform the DBS of any individual (paid employee, volunteer or other) who poses a threat to children or vulnerable adults
- 4.1.5. Ensure appropriate response to any concern or allegation about a member of staff or volunteer
- 4.1.6. Develop effective links with relevant agencies and co-operate as required with their enquiries regarding child protection matters including attendance at case conferences and core group meetings.

Protect

- 4.1.7. Establish and maintain a safe environment in which students feel secure and are encouraged to talk freely about anything that concerns them
- 4.1.8. Ensure students know that they can approach their tutor or other members of staff if they are worried about anything, including issues related to radicalisation and extremism
- 4.1.9. Provide early intervention and support as soon as a problem emerges at any point in the young person's or vulnerable adult's life
- 4.1.10. Include opportunities in the curriculum to develop and equip students with the skills needed to recognise risks and stay safe from abuse
- 4.1.11. Support students who have been abused or may be at risk of harm, including self-harm, in accordance with any agreed child protection plan
- 4.1.12. Ensure staff follow accepted health and safety practices when working with students and that, where appropriate, risk assessments are carried out
- 4.1.13. Help students who are over 18 and not defined as vulnerable adults if they feel they are at risk through creating an environment, where they are encouraged to talk to the Police and/or other specialist services.

Record and monitor

- 4.1.14. Ensure staff are aware of the need to record any concerns held about the learner within the College, the need to keep safeguarding records separate to tutorial records and secure, and when they should be passed on to other agencies.

5 Group Roles and Responsibilities

- 5.1. Safeguarding is a fundamental responsibility of all individual staff, however the oversight and management of Safeguarding within the group is given to the Corporation, the Principal/CEO, the Senior Post-Holder with responsibility for safeguarding, the Designated Lead Safeguarding Officer and their deputies. They ensure that structures and staffing are in place to ensure the effective delivery of safeguarding procedures within the individual Colleges.

5.2. Responsibilities of the Corporation

The Corporation will:

- 5.2.1. Approve and annually review the Group Safeguarding Policy
- 5.2.2. Select a Governor to take leadership responsibility within the Corporation for the organisation's safeguarding arrangements.
- 5.2.3. Ensure an appropriate senior member of staff, from the school or college leadership team, is appointed to the role of designated safeguarding lead. The designated safeguarding lead should take lead responsibility for safeguarding and child protection. This will be explicit in the role-holder's job description.
- 5.2.4. Ensure there are procedures in place to manage concerns/allegations, against staff (including volunteers) that might indicate they would pose a risk of harm to children.

Furthermore the Governing Body will ensure that the Group:

- 5.2.5. Raises awareness of issues relating to safeguarding and promotes the welfare of children, young people and vulnerable adults
- 5.2.6. Provides a safe environment in which students learn
- 5.2.7. Identifies children and young people who are suffering, or at risk of suffering, significant harm and takes appropriate action to see that such children and young people are kept safe
- 5.2.8. Identifies students at risk of radicalisation are supported
- 5.2.9. Has procedures for reporting and dealing with allegations of abuse against members of staff and volunteers
- 5.2.10. Operates safe recruitment procedures
- 5.2.11. Remedies any deficiencies or weaknesses in regard to child protection arrangements that are brought to the Governing Body or management attention.

5.3. Responsibilities of the Principal/CEO

The Principal/CEO will:

- 5.3.1. Ensure the Group's Policy for Safeguarding children and vulnerable adults and other related College policies and procedures (including the safer recruitment of staff and managing cases of allegations made against staff) are in place and implemented to ensure the welfare of learners
- 5.3.2. Delegate operational responsibility and implementation of procedures to a Senior Post-holder and a senior Designated Lead for Safeguarding
- 5.3.3. Receive immediate notification of any changes affecting the policy or procedures and ensure the policy is reviewed and amended as appropriate.
- 5.3.4. Ensure staff are familiar with this Policy and Procedure, and specifically have read KCSE 2018.

5.4. Responsibilities of the allocated Senior Post-Holder

The Senior Post-Holder will:

- 5.4.1. Have overall operational responsibility for Safeguarding across the Group
- 5.4.2. Act as line Manager for the Designated Lead for Safeguarding
- 5.4.3. Ensure that the Group has appropriate up to date safeguarding policies and procedures in place to ensure the safeguarding of all children and vulnerable adults, and that these are reviewed at least annually.
- 5.4.4. Ensure that there are designated Deputy Designated Safeguarding Leads in each of the Group's Colleges, and that safeguarding arrangements in each College are fit for purpose

5.5. Responsibilities of the College Principal

The College Principal will:

- 5.5.1. Ensure the Group's Policy for Safeguarding children and vulnerable adults and associated College procedures are implemented in their College to ensure the welfare of learners
- 5.5.2. Be responsible for receiving allegations against members of staff, contractors and volunteers and passing them on to the Director of Human Resources and Designated Lead Safeguarding Officer.

5.6. Responsibilities of the Designated Lead Safeguarding Officer

The Designated Lead Safeguarding Officer has the ultimate lead responsibility for safeguarding in the College. The full list of responsibilities as required by Keeping Children Safe in Education 2018 is contained in Annex B. In summary the Designated Lead Safeguarding Officer will:

- 5.6.1. Coordinate safeguarding practices across the Group
- 5.6.2. Liaise with Heads of College/College Principals and the Director of Human Resources to deal with allegations against members of staff, contractors and volunteers
- 5.6.3. Consult with the Designated Officer from the relevant Local Authority as appropriate, in order to ensure that all allegations against staff, contractors and volunteers are dealt with in an objective and transparent way

- 5.6.4. Ensure that the Director of Human Resources records details of any allegations against staff, contractors and volunteers and carries out any agreed actions with the Designated Officer from the relevant Local Authority and reports on outcomes
- 5.6.5. Act as an external contact person within the College, providing advice and support and ensuring that all staff (including temporary, supply staff and volunteers and members of the Governing Body) are aware of their role
- 5.6.6. Work with the Deputy Lead Safeguarding Officers to co-ordinate action within the each College on child protection issues
- 5.6.7. Oversee the planning of any curricular or other provision in relation to child protection and safeguarding matters and the Prevent agenda
- 5.6.8. Ensure students are aware of the issues around safeguarding and Prevent, through enrichment and tutorial activities and know who to talk to if they have any concerns
- 5.6.9. Raise awareness about safeguarding and child protection on an on-going basis
- 5.6.10. Arrange updates on safeguarding training for staff on an annual basis and induction training on child protection for new staff
- 5.6.11. Ensure that the Designated Safeguarding Lead, the Deputy Lead Officers and the Safeguarding Nominates and Officers receive update training on a regular basis, at least annually.
- 5.6.12. Have the DLSO role specified with their job description

5.7. Responsibilities of the Deputy Designated Lead Safeguarding Officer

The DDLSO will:

- 5.7.1. Be trained to the same standard as the DLSO
- 5.7.2. Take operational responsibility for safeguarding in an individual College within the Group (which may include more than one site)
- 5.7.3. Act as the main referral point for any potential safeguarding cases within the College
- 5.7.4. Oversee safeguarding cases within a particular College, liaising with social workers, local authorities, and other agencies, referring any serious cases to the Designated Lead Safeguarding Officer
- 5.7.5. Make referrals to external agencies as appropriate
- 5.7.6. Attend local Safeguarding Boards on behalf of the DLSO
- 5.7.7. Have the Deputy DLSO role specified with their job description

5.8. Responsibilities of individual members of staff

- 5.8.1. All staff have a responsibility to provide a safe environment in which children can learn and all staff should be prepared to identify children who may benefit from early help. Early help means providing support as soon as a problem emerges.
- 5.8.2. All staff should be familiar with how to make a safeguarding referral, and any staff member who has a concern about a child's welfare should follow the Group's referral processes
- 5.8.3. All staff must undertake initial safeguarding training followed by regular updates

5.8.4. All staff should know what to do if a child tells them he/she is being abused or neglected

5.8.5. 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 has a duty to ensure this is reported to the police.

5.8.6. Refer any concerns they may have about any member of staff in relation to the safeguarding of a child or vulnerable adult to the College Principal.

5.8.7. In relation to safeguarding, all concerns, discussions and decisions made, and the reasons for those decisions, should be recorded in writing.

6 Review

6.1. The policy will be subject to annual review. The review will be initiated by the Designated Safeguarding Officer.

7 Access to the policy

7.1. The policy will be published on each College's website.

Part one: Safeguarding information for all staff

What school and college staff should know and do

A child centred and coordinated approach to safeguarding

1. Schools and colleges and their staff are an important part of the wider safeguarding system for children. This system is described in statutory guidance [Working Together to Safeguard Children](#).
2. Safeguarding and promoting the welfare of children is **everyone's** responsibility. **Everyone** who comes into contact with children and their families has a role to play. In order to fulfil this responsibility effectively, all practitioners should make sure their approach is child-centred. This means that they should consider, at all times, what is in the **best interests** of the child.
3. No single practitioner can have a full picture of a child's needs and circumstances. If children and families are to receive the right help at the right time, **everyone** who comes into contact with them has a role to play in identifying concerns, sharing information and taking prompt action.
4. 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 health or development
 - ensuring that children grow up in circumstances consistent with the provision of safe and effective care
 - taking action to enable all children to have the best outcomes
5. Children includes everyone under the age of 18.

The role of school and college staff

6. School and college staff are particularly important as they are in a position to identify concerns early, provide help for children, and prevent concerns from escalating.
7. **All** staff have a responsibility to provide a safe environment in which children can learn and **all** staff should be prepared to identify children who may benefit from early

help.³ Early help means providing support as soon as a problem emerges at any point in a child's life, from the foundation years through to the teenage years.

8. **Any staff member** who has a concern about a child's welfare should follow the referral processes set out in paragraphs 22-33. Staff should expect to support social workers and other agencies following any referral.

9. Every school and college should have a designated safeguarding lead who will provide support to staff to carry out their safeguarding duties and who will liaise closely with other services such as children's social care.

10. The designated safeguarding lead (and any deputies) are most likely to have a complete safeguarding picture and be the most appropriate person to advise on the response to safeguarding concerns.

11. The Teachers' Standards 2012 state that teachers (which includes headteachers) should safeguard children's wellbeing and maintain public trust in the teaching profession as part of their professional duties.⁴

What school and college staff need to know

12. **All** staff should be aware of systems within their school or college which support safeguarding and these should be explained to them as part of staff induction. This should include:

- the child protection policy;
- the behaviour policy;⁵
- the staff behaviour policy (sometimes called a code of conduct);
- the safeguarding response to children who go missing from education; and
- the role of the designated safeguarding lead (including the identity of the designated safeguarding lead and any deputies).

Copies of policies and a copy of Part one of this document should be provided to staff at induction.

³ Detailed information on early help can be found in Chapter 1 of [Working Together to Safeguard Children](#).

⁴ The [Teachers' Standards](#) apply to: trainees working towards QTS; all teachers completing their statutory induction period (newly qualified teachers [NQTs]); and teachers in maintained schools, including maintained special schools, who are subject to the Education (School Teachers' Appraisal) (England) Regulations 2012.

⁵ All schools are required to have a behaviour policy (full details are [here](#)). If a college chooses to have a behaviour policy it should be provided to staff as described above.

13. **All** staff should receive appropriate safeguarding and child protection training which is regularly updated. In addition, all staff should receive safeguarding and child protection updates (for example, via email, e-bulletins and staff meetings), as required, and at least annually, to provide them with relevant skills and knowledge to safeguard children effectively.
14. **All** staff should be aware of their local early help⁶ process and understand their role in it.
15. **All** staff should be aware of the process for making referrals to children's social care and for statutory assessments under the Children Act 1989, especially section 17 (children in need) and section 47 (a child suffering, or likely to suffer, significant harm) that may follow a referral, along with the role they might be expected to play in such assessments.⁷
16. **All** staff should know what to do if a child tells them he/she is being abused or neglected. Staff should know how to manage the requirement to maintain an appropriate level of confidentiality. This means only involving those who need to be involved, such as the designated safeguarding lead (or a deputy) and children's social care. Staff should never promise a child that they will not tell anyone about a report of abuse, as this may ultimately not be in the best interests of the child.

What school and college staff should look out for

17. **Any** child may benefit from early help, but all school and college staff should be particularly alert to the potential need for early help for a child who:
- is disabled and has specific additional needs
 - has special educational needs (whether or not they have a statutory Education, Health and Care Plan)
 - is a young carer
 - is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups
 - is frequently missing/goes missing from care or from home
 - is at risk of modern slavery, trafficking or exploitation
 - is at risk of being radicalised or exploited
 - is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
 - is misusing drugs or alcohol themselves

⁶ Detailed information on early help can be found in Chapter 1 of [Working Together to Safeguard Children](#).

⁷ More information on statutory assessments is included at paragraph 28. Detailed information on statutory assessments can be found in Chapter 1 of [Working Together to Safeguard Children](#).

- has returned home to their family from care
- is a privately fostered child

18. **All** staff should be aware of indicators of abuse and neglect so that they are able to identify cases of children who may be in need of help or protection. Indicators of abuse and neglect, and examples of safeguarding issues are described in paragraphs 41-51.

19. Departmental advice [What to Do if You Are Worried a Child is Being Abused - Advice for Practitioners](#) provides more information on understanding and identifying abuse and neglect. Examples of potential indicators of abuse and neglect are highlighted throughout the advice and will be particularly helpful for school and college staff. The [NSPCC](#) website also provides useful additional information on abuse and neglect and what to look out for.

20. Staff working with children are advised to maintain an attitude of ‘**it could happen here**’ where safeguarding is concerned. When concerned about the welfare of a child, staff should always act in the **best** interests of the child.

21. Knowing what to look for is vital to the early identification of abuse and neglect. If staff are unsure, they should **always** speak to the designated safeguarding lead (or deputy).

What school and college staff should do if they have concerns about a child

22. If staff have **any concerns** about a child’s welfare, they should act on them immediately. See page 13 for a flow chart setting out the process for staff when they have concerns about a child.

23. If staff have a concern, they should follow their own organisation’s child protection policy and speak to the designated safeguarding lead (or deputy).

24. Options will then include:

- managing any support for the child internally via the school’s or college’s own pastoral support processes;
- an early help assessment;⁸ or

⁸ Further information on early help assessments, provision of early help services and accessing services is in Chapter 1 of [Working Together to Safeguard Children](#).

- a referral for statutory services,⁹ for example as the child might be in need, is in need or suffering or likely to suffer harm.

25. The designated safeguarding lead or a deputy should always be available to discuss safeguarding concerns. If in exceptional circumstances, the designated safeguarding lead (or deputy) is not available, this should not delay appropriate action being taken. Staff should consider speaking to a member of the senior leadership team and/or take advice from local children's social care. In these circumstances, any action taken should be shared with the designated safeguarding lead (or deputy) as soon as is practically possible.

26. Staff should not assume a colleague or another professional will take action and share information that might be critical in keeping children safe. They should be mindful that early information sharing is vital for effective identification, assessment and allocation of appropriate service provision. [Information Sharing: Advice for Practitioners Providing Safeguarding Services to Children, Young People, Parents and Carers](#) supports staff who have to make decisions about sharing information. This advice includes the seven golden rules for sharing information and considerations with regard to the Data Protection Act 2018 and General Data Protection Regulation (GDPR). If in any doubt about sharing information, staff should speak to the designated safeguarding lead or a deputy. Fears about sharing information **must not** be allowed to stand in the way of the need to promote the welfare, and protect the safety, of children.

Early help

27. If early help is appropriate, the designated safeguarding lead (or deputy) will generally lead on liaising with other agencies and setting up an inter-agency assessment as appropriate. Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead practitioner. Any such cases should be kept under constant review and consideration given to a referral to children's social care for assessment for statutory services, if the child's situation does not appear to be improving or is getting worse.

⁹ Chapter 1 of [Working Together to Safeguard Children](#) sets out that the safeguarding partners should publish a threshold document that should include the criteria, including the level of need, for when a case should be referred to local authority children's social care for assessment and for statutory services under section 17 and 47. Local authorities, with their partners, should develop and publish local protocols for assessment. A local protocol should set out clear arrangements for how cases will be managed once a child is referred into local authority children's social care.

Statutory assessments

28. **Where a child is suffering, or is likely to suffer from harm, it is important that a referral to children's social care (and if appropriate the police) is made immediately.** Referrals should follow the local referral process.

Children in need

A child in need is defined under the Children Act 1989 as a child who is unlikely to achieve or maintain a reasonable level of health or development, or whose health and development is likely to be significantly or further impaired, without the provision of services; or a child who is disabled. Local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare. Children in need may be assessed under section 17 of the Children Act 1989.

Children suffering or likely to suffer significant harm

Local authorities, with the help of other organisations as appropriate, have a duty to make enquires under section 47 of the Children Act 1989 if they have reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm. Such enquiries enable them to decide whether they should take any action to safeguard and promote the child's welfare and must be initiated where there are concerns about maltreatment, including all forms of abuse and neglect, female genital mutilation or other so-called honour based violence, and extra-familial threats like radicalisation and sexual exploitation.

29. The online tool [Report Child Abuse to Your Local Council](#) directs to the relevant local children's social care contact number.

What will the local authority do?

30. Within one working day of a referral being made, a local authority social worker should acknowledge receipt to the referrer and make a decision about the next steps and the type of response that is required. This will include determining whether:

- the child requires immediate protection and urgent action is required
- the child is in need, and should be assessed under section 17 of the Children Act 1989
- there is reasonable cause to suspect the child is suffering or likely to suffer significant harm, and whether enquiries must be made and the child assessed under section 47 of the Children Act 1989
- any services are required by the child and family and what type of services
- further specialist assessments are required to help the local authority to decide what further action to take
- to see the child as soon as possible if the decision is taken that the referral requires further assessment.

31. The referrer should follow up if this information is not forthcoming.
32. If social workers decide to carry out a statutory assessment, staff should do everything they can to support that assessment (supported by the designated safeguarding lead (or deputy) as required).
33. If, after a referral, the child's situation does not appear to be improving, the referrer should consider following local escalation procedures to ensure their concerns have been addressed and, most importantly, that the child's situation improves.

Female Genital Mutilation mandatory reporting duty for teachers

34. 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**.¹⁰ 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. **See Annex A** for further details.

Record keeping

35. All concerns, discussions and decisions made, and the reasons for those decisions, should be recorded in writing. If in doubt about recording requirements, staff should discuss with the designated safeguarding lead (or deputy).

Why is all of this important?

36. It is important for children to receive the right help at the right time to address risks and prevent issues escalating. Research and serious case reviews have repeatedly shown the dangers of failing to take effective action.¹¹ Examples of poor practice include:

- failing to act on and refer the early signs of abuse and neglect;
- poor record keeping;
- failing to listen to the views of the child;
- failing to re-assess concerns when situations do not improve;
- not sharing information;
- sharing information too slowly; and
- a lack of challenge to those who appear not to be taking action.

¹⁰ Under Section 5B(11) (a) of the Female Genital Mutilation Act 2003, "teacher" means, in relation to England, a person within section 141A(1) of the Education Act 2002 (persons employed or engaged to carry out teaching work at schools and other institutions in England).

¹¹ An analysis of serious case reviews can be found at [Serious case reviews, 2011 to 2014](#).

What school and college staff should do if they have concerns about another staff member who may pose a risk of harm to children

37. If staff have safeguarding concerns, or an allegation is made about another member of staff (including volunteers) posing a risk of harm to children, then:

- this should be referred to the headteacher or principal;
- where there are concerns/allegations about the headteacher or principal, this should be referred to the chair of governors, chair of the management committee or proprietor of an independent school; and
- in the event of concerns/allegations about the headteacher, where the headteacher is also the sole proprietor of an independent school, allegations should be reported directly to the designated officer(s) at the local authority. (Further details can be found in Part four of this guidance).

What school or college staff should do if they have concerns about safeguarding practices within the school or college

38. All staff and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in the school's or college's safeguarding regime and know that such concerns will be taken seriously by the senior leadership team.

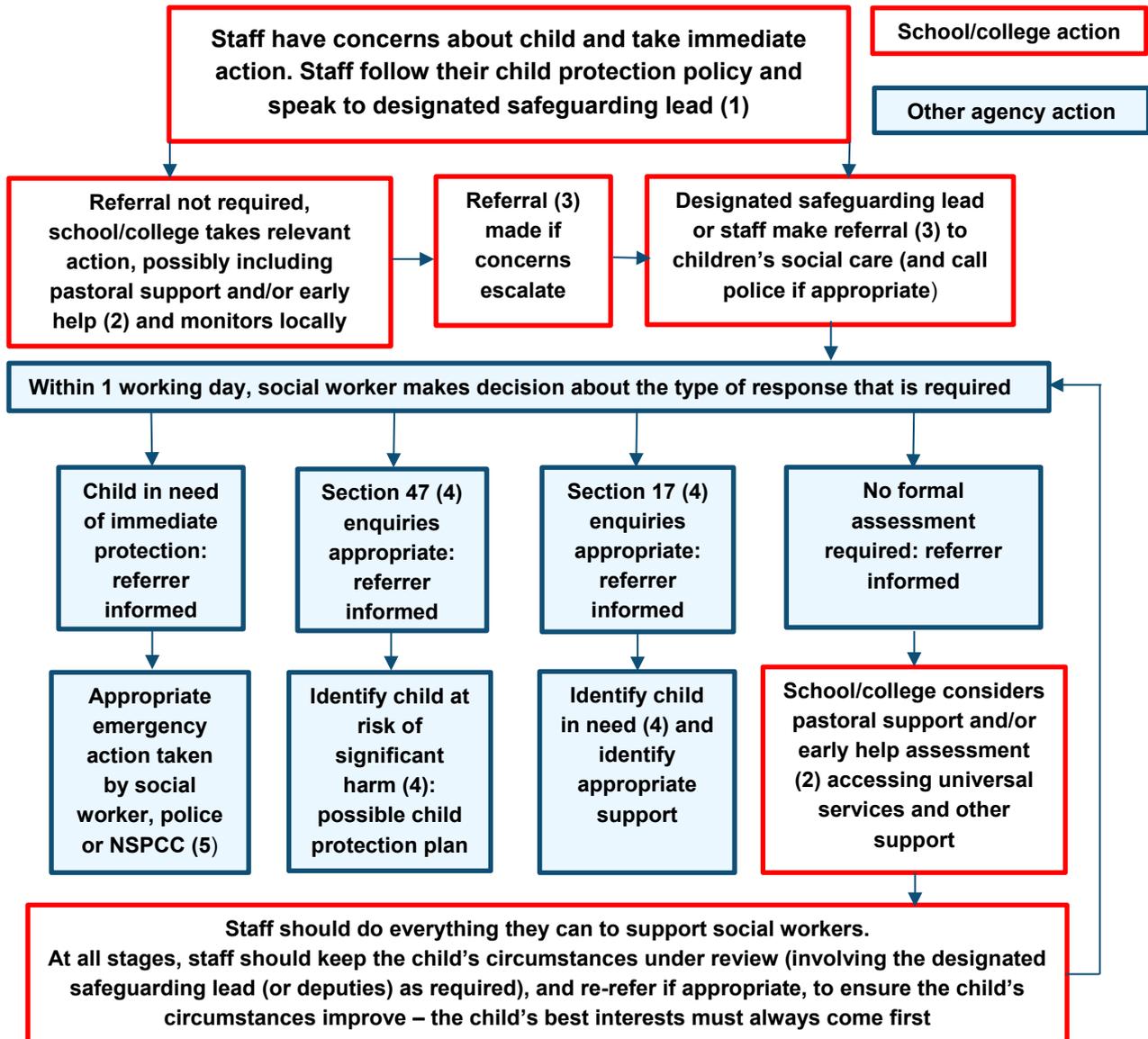
39. Appropriate whistleblowing procedures, should be put in place for such concerns to be raised with the school's or college's senior leadership team.

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

- General guidance on whistleblowing can be found via: [Advice on Whistleblowing](#).
- The [NSPCC whistleblowing helpline](#) is available as an alternative route for staff who do not feel able to raise concerns regarding child protection failures internally or have concerns about the way a concern is being handled by their school or college. Staff can call 0800 028 0285 – line is available from 8:00 AM to 8:00 PM, Monday to Friday and email: help@nspcc.org.uk¹²

¹² Alternatively, staff can write to: National Society for the Prevention of Cruelty to Children (NSPCC), Weston House, 42 Curtain, Road, London EC2A 3NH.

Actions where there are concerns about a child



(1) In cases which also involve a concern or an allegation of abuse against a staff member, see Part Four of this guidance.

(2) Early help means providing support as soon as a problem emerges at any point in a child's life. Where a child would benefit from co-ordinated early help, an early help inter-agency assessment should be arranged. Chapter one of [Working Together to Safeguard Children](#) provides detailed guidance on the early help process.

(3) Referrals should follow the process set out in the local threshold document and local protocol for assessment. Chapter one of [Working Together to Safeguard Children](#).

(4) Under the Children Act 1989, local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare. Children in need may be assessed under section 17 of the Children Act 1989. Under section 47 of the Children Act 1989, where a local authority has reasonable cause to suspect that a child is suffering or likely to suffer significant harm, it has a duty to make enquiries to decide whether to take action to safeguard or promote the child's welfare. Full details are in Chapter one of [Working Together to Safeguard Children](#).

(5) This could include applying for an Emergency Protection Order (EPO).

Indicators of abuse and neglect

41. **All** school and college staff should be aware that abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap with one another.

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

43. **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.

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

45. **Sexual abuse:** involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education (see paragraph 48).

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

Specific safeguarding issues

47. **All** staff should have an awareness of safeguarding issues that can put children at risk of harm. Behaviours linked to issues such as drug taking, alcohol abuse, deliberately missing education and sexting (also known as youth produced sexual imagery) put children in danger.

48. **All** staff should be aware that safeguarding issues can manifest themselves via peer on peer abuse. This is most likely to include, but may not be limited to:

- bullying (including cyberbullying);
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm;
- sexual violence and sexual harassment;
- sexting (also known as youth produced sexual imagery); and
- initiation/hazing type violence and rituals.

49. **All** staff should be clear as to the school's or college's policy and procedures with regards to peer on peer abuse.

50. Safeguarding incidents and/or behaviours can be associated with factors outside the school or college and/or can occur between children outside the school or college. All staff, but especially the designated safeguarding lead (and deputies) should be considering the context within which such incidents and/or behaviours occur. This is known as contextual safeguarding, which simply means assessments of children should consider whether wider environmental factors are present in a child's life that are a threat to their safety and/or welfare. Children's social care assessments should consider such factors so it is important that schools and colleges provide 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. Additional information regarding contextual safeguarding is available here: [Contextual Safeguarding](#).

51. **Annex A** contains important additional information about specific forms of abuse and safeguarding issues. School and college leaders and those staff who work directly with children should read the annex.

Annex B: Role of the designated safeguarding lead

Governing bodies, proprietors and management committees should ensure an appropriate **senior member** of staff, from the school or college **leadership team**, is appointed to the role of designated safeguarding lead.¹⁰⁹ The designated safeguarding lead should take **lead responsibility** for safeguarding and child protection (including online safety). This should be explicit in the role holder's job description. This person should have the appropriate status and authority within the school to carry out the duties of the post. They should be given the time, funding, training, resources and support to provide advice and support to other staff on child welfare and child protection matters, to take part in strategy discussions and inter-agency meetings, and/or to support other staff to do so, and to contribute to the assessment of children.

Deputy designated safeguarding leads

It is a matter for individual schools and colleges as to whether they choose to have one or more deputy designated safeguarding leads. Any deputies should be trained to the same standard as the designated safeguarding lead and the role should be explicit in their job description. Whilst the activities of the designated safeguarding lead can be delegated to appropriately trained deputies, the ultimate **lead responsibility** for child protection, as set out above, remains with the designated safeguarding lead, this **lead responsibility** should not be delegated.

Manage referrals

The designated safeguarding lead is expected to:

- refer cases of suspected abuse to the local authority children's social care as required;
- support staff who make referrals to local authority children's social care;
- refer cases to the Channel programme where there is a radicalisation concern as required;
- support staff who make referrals to the Channel programme;

¹⁰⁹ When a school has a sole proprietor rather than a governing body, appropriate steps should be taken to ensure that the member of the senior leadership team who is appointed as designated safeguarding lead (DSL) is able to discharge that role with sufficient independence, particularly in relation to any allegations involving the proprietor or members of the proprietor's family. This may involve including in the appointment as DSL, written confirmation that part of the duties of the post involve contacting the Local Authority Designated Officer on any matter that the DSL considers cannot be properly dealt with internally. Consideration could also be given to providing the DSL with access to external advice from an appropriate company or legal service.

- refer cases where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service as required; and
- refer cases where a crime may have been committed to the Police as required.

Work with others

The designated safeguarding lead is expected to:

- act as a point of contact with the three safeguarding partners;
- liaise with the headteacher or principal to inform him or her of issues- especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations;
- as required, liaise with the “case manager” (as per Part four) and the designated officer(s) at the local authority for child protection concerns in cases which concern a staff member;
- liaise with staff (especially pastoral support staff, school nurses, IT Technicians, and SENCOs or the named person with oversight for SEN in a college) on matters of safety and safeguarding (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies; and
- act as a source of support, advice and expertise for all staff.

Training

The designated safeguarding lead (and any deputies) should undergo training to provide them with the knowledge and skills required to carry out the role. This training should be updated at least every two years. The designated safeguarding lead should undertake Prevent awareness training.

In addition to the formal training set out above, their knowledge and skills should be refreshed (this might be via e-bulletins, meeting other designated safeguarding leads, or simply taking time to read and digest safeguarding developments) at regular intervals, as required, and at least annually, to allow them to understand and keep up with any developments relevant to their role so they:

- understand the assessment process for providing early help and statutory intervention, including local criteria for action and local authority children’s social care referral arrangements.¹¹⁰

¹¹⁰ Full details in Chapter one of [Working Together to Safeguard Children](#).

- have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so;
- ensure each member of staff has access to, and understands, the school's or college's child protection policy and procedures, especially new and part time staff;
- are alert to the specific needs of children in need, those with special educational needs and young carers;¹¹¹
- understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the General Data Protection Regulation.
- understand the importance of information sharing, both within the school and college, and with the three safeguarding partners, other agencies, organisations and practitioners.
- are able to keep detailed, accurate, secure written records of concerns and referrals;
- understand and support the school or college with regards to the requirements of the Prevent duty and are able to provide advice and support to staff on protecting children from the risk of radicalisation;
- are able to understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online at school or college;
- can recognise the additional risks that children with SEN and disabilities (SEND) face online, for example, from online bullying, grooming and radicalisation and are confident they have the capability to support SEND children to stay safe online;
- obtain access to resources and attend any relevant or refresher training courses; and
- encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the school or college may put in place to protect them.

Raise Awareness

The designated safeguarding lead should:

¹¹¹ Section 17(10) Children Act 1989: those unlikely to achieve a reasonable standard of health and development without local authority services, those whose health and development is likely to be significantly impaired without the provision of such services, or disabled children.

- ensure the school's or college's child protection policies are known, understood and used appropriately;
- ensure the school's or college's child protection policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with governing bodies or proprietors regarding this;
- ensure the child protection policy is available publicly and parents are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the school or college in this; and
- link with the safeguarding partner arrangements to make sure staff are aware of any training opportunities and the latest local policies on local safeguarding arrangements.

Child protection file

Where children leave the school or college the designated safeguarding lead should ensure their child protection file is transferred to the new school or college as soon as possible. This should be transferred separately from the main pupil file, ensuring secure transit, and confirmation of receipt should be obtained. Receiving schools and colleges should ensure key staff such as designated safeguarding leads and SENCOs or the named person with oversight for SEN in colleges, are aware as required.

In addition to the child protection file, the designated safeguarding lead should also consider if it would be appropriate to share any information with the new school or college in advance of a child leaving. For example, information that would allow the new school or college to continue supporting victims of abuse and have that support in place for when the child arrives.

Availability

During term time the designated safeguarding lead (or a deputy) should always be available (during school or college hours) for staff in the school or college to discuss any safeguarding concerns. Whilst generally speaking the designated safeguarding lead (or deputy) would be expected to be available in person, it is a matter for individual schools and colleges, working with the designated safeguarding lead, to define what "available" means and whether in exceptional circumstances availability via phone and or Skype or other such media is acceptable.

It is a matter for individual schools and colleges and the designated safeguarding lead to arrange adequate and appropriate cover arrangements for any out of hours/out of term activities.