

# CHILD PROTECTION AND SAFEGUARDING POLICY

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| POLICY OWNER:     | Designated Safeguarding Lead |
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## Policy Statement

BMet has a statutory and moral duty to ensure that the College functions with a view to safeguarding and promoting the welfare of children and vulnerable adults receiving education and training at the College. The College's responsibility to safeguard and promote the welfare of children and vulnerable adults is of paramount importance.

This policy has been developed in accordance with the principles established by the [Children's Acts 1989](#) and [2004](#); [the Education Act 2002 section 175](#) and in line with government publications including ['Working Together to Safeguard Children' 2018](#), , ["Tackling Extremism in the UK"](#), DfES ["Teaching Approaches that help Build Resilience to Extremism among Young People"](#) and the [Prevent Duty 2015](#). ['What to do if you are Worried a Child is Being Abused' 2015](#) and it reflects ['Keeping Children Safe in Education' 2020](#).

The College should provide a caring, positive, safe and stimulating environment that promotes the social, physical and moral development of the individual child. Throughout these policies and procedures, reference is made to "children and vulnerable young people". This term is used to mean "those under the age of 18". The Governing Body recognises that some adults are also vulnerable to abuse, accordingly, the procedures may be applied (with appropriate adaptations) to allegations of abuse and the protection of vulnerable adults. All children and young people, regardless of age, gender, ability, culture, race, language, religion or sexual identity, have equal rights to protection.

A child is legally defined as '*any person who is under the age of 18 years*'. Further education providers are required to safeguard and promote the welfare of children. Reference is also made throughout to "adults at risk of harm". Adults at risk of harm are defined as people aged 18 years old and over who may need or receive community care services by reason of mental health or other disability, age or illness and who may be unable to take care of themselves or protect themselves against significant harm or exploitation ([No Secrets, Department of Health, March 2000](#)). The procedure will be applied with appropriate adaptations to all students.

The main categories of people covered by this definition of vulnerable adult include people:

- who have a learning disability
- who have physical or sensory impairments
- who have a mental illness including dementia
- who are old and frail
- detained in custody or under a probation order
- who are considered vulnerable and who may experience abuse due to problems with alcohol or drugs (or be vulnerable due to other circumstances such as being an asylum seeker).

The designated safeguarding lead will ensure that a student's child protection file is transferred to a different educational setting should they move on and the process for doing this.

Reference to and awareness of issues around the safeguarding of looked after children is clear throughout. "The most common reason for children becoming looked after is as a result of abuse and/or neglect. Governing bodies should ensure that staff have the skills, knowledge and understanding necessary to keep looked after children safe

Children and vulnerable adults will include those who are in care; have been previously 'looked after' by Social Services; are living independently and are under the age of 18; have had (or are still experiencing) mental health issues; have disabilities; are children that are also carers; have suffered abuse (as defined by the government).

## **Policy Aims**

In order to protect our children and young people the College aims to:

- Set clear standards of behaviour for staff and students;
- Create an environment where everyone can feel secure, valued and listened to recognise signs and symptoms of abuse;
- Respond quickly and effectively to cases of suspected abuse monitor and support those at risk
- Addressing concerns at the earliest possible stage; and reduce the potential risks students face of being exposed to, violence, extremism exploitation, discrimination or victimisation;
- Use the curriculum delivery model to raise their awareness, build confidence and skills work closely with parents/carers and support external agencies;
- Ensure that all adults within our College who have access to children have been checked as to their suitability.

## **Preventing Extremism and Radicalisation**

- A further key aim of our Safeguarding Policy is to prevent students being drawn into terrorism which we aim to achieve by:
- Promoting and reinforce shared values; to create space for free and open debate within the law and with respect to fundamental British values.
- Breaking down segregation amongst different student communities including by supporting inter-faith and inter-cultural dialogue and understanding and to engage all students in playing a full and active role in wider engagement in society.
- Ensuring student safety and Colleges that are free from bullying, harassment and intimidation.
- Providing support for students who may be at risk and appropriate sources of advice and guidance.
- Ensuring that students and staff are aware of their roles and responsibilities in preventing violent extremism.

The College will closely follow any locally agreed procedure as set out by the Local Authority Safeguarding Children's Partnerships agreed processes and criteria for safeguarding individuals vulnerable to extremism and radicalisation.

In developing safeguarding policies and procedures, the College will consult with, and take account of, guidance issued by the Department for Education and other relevant bodies and groups. The procedures have been developed in cooperation with the Birmingham Safeguarding Children Partnership (BSCP).

All staff will be aware of the process for making referrals to the relevant Children's Social Services Department for statutory assessments as a child in need (section 17) or a child or young person suffering from, or at risk of, significant harm (section 47). Referrals will be made to the relevant Social Services in the area in which the young person's home address is located. All staff have a duty to safeguard children and a responsibility for the active protection of children from harm. We will ensure that arrangements are in place for all persons working at the College to be made aware of this policy and to receive appropriate training so that they can carry out this duty as required.

## **Governing Body Responsibilities**

The Governing Body at Birmingham Metropolitan College abide by their responsibilities as outlined in Keeping Children Safe in Education. Governors also have specific responsibility for ensuring that the College monitors the impact of its work and learns lessons from Serious Case Reviews. As stated in Keeping Children Safe in Education (2020), "Governing bodies should ensure that there are

appropriate policies and procedures in place in order for appropriate action to be taken in a timely manner to safeguard and promote children's welfare".

The Governing Body ensures that the College:

- Provides a safe environment for children, young people and adults at risk of harm to learn in;
- Identify those who are suffering or are likely to suffer significant harm or who are at risk of radicalisation;
- Will nominate a Governor to take lead responsibility for Child Protection issues;
- The nominated Governor undertakes appropriate training;
- Take appropriate action to see that students are kept safe at College and that disclosures of potential abuse occurring at home or elsewhere are reported appropriately;
- Report allegations of modern slavery and / or human trafficking in accordance with the [Modern Day Slavery Act 2015](#);
- Have a system for identifying concerns in relation to abuse of adults at risk of harm and effective methods of responding to disclosures;
- Refer concerns that a child, young person or adult at risk of significant harm or might be at risk of significant harm to the appropriate referral agencies;
- Work effectively with others as required by "[Working Together to Safeguard Children](#)";
- Listen to the voice of a child and always act in the interest of the child;
- Appoint a member of the Senior Leadership Team as Designated Senior Lead for Child Protection;
- Ensure appropriate safeguarding responses for children who go missing from College;
- Have safeguarding policies and procedures that are consistent with the local Safeguarding Children Partnership requirements, reviewed annually and made available via the college website.

The Principal, Governors and all staff working with children, young people and adults at risk of harm will receive adequate training to familiarise them with their safeguarding roles and responsibilities. They will be familiar with College procedures and policies and receive refresher training at least every 2 years. A senior member of staff will co-ordinate child protection arrangements and will be the Designated Senior Lead (DSL). They will be assisted by a Deputy Designated Persons who will support and share responsibility for safeguarding.

## **Categories of Abuse**

The Governing Body recognises the following as categories of abuse and neglect.

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

### **Contextual Safeguarding**

Safeguarding incidents and/or behaviours can be associated with factors outside College and/or can occur between children outside College. Extra-familial harms can take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, and serious youth violence. All our staff need to consider the context within which such incidents and/or behaviours occur. This is known as "contextual safeguarding", which 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.

## **Physical abuse**

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

## **Emotional abuse**

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on their emotional development. It may involve conveying to them that they are worthless or unloved, inadequate, or valued only in so far as they meet the needs of another person. It may include not giving them opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate.

It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond the child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyber bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, though it may occur alone.

## **Sexual abuse**

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities. It may not necessarily involve a high level of violence, whether or not the child may not be aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing.

They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education.

## **Neglect**

Neglect is 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 mental health, physical health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to:

- provide adequate food, clothing and shelter (including exclusion from home or abandonment);
- protect a child from physical and emotional harm or danger;
- ensure adequate supervision (including the use of inadequate care-givers); or
- ensure access to appropriate medical care or treatment;

It may also include neglect of, or unresponsiveness to a child's basic emotional needs.

## **So-Called Honour Based Abuse (HBA) – including Female Genital Mutilation and Forced Marriage**

So called "honour based abuse (HBA) previously honour based violence, encompasses crimes which have been committed to protect or defend the honour of the family and/or the community

including Female Genital Mutilation (FGM), forced marriage and practices, such as, breast ironing. 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 so called HBA are forms of abuse and staff should refer any concerns to the Safeguarding Team.

### **Female Genital Mutilation**

This comprises all procedures that involve partial or total removal of the external female genitalia, or other injury to the female genital organs for non-medical reasons. Since October 2015, there is a specific, legal duty on staff to personally report to the police where they discover that FGM appears to have been carried out on a girl under 18. Those failing to report such cases will face disciplinary sanctions. Information on when and how to make a report can be found at: Mandatory Reporting of FGM. Guidance on the warning signs that FGM may be about to take place, or may have already taken place, can be found on pages 38-41 of the [Multi Agency Statutory guidance on FGM](#) (pages 59-61 focus on the role of schools and colleges).

### **Forced Marriage**

A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Pages 13-14 of the Multi-agency guidelines: [Handling cases of forced marriage](#) gives potential indicators of someone facing a forced marriage with pages 32-36 focussing on the role of schools and colleges. The Forced Marriage Unit has also published statutory guidance. College staff can contact the Forced Marriage Unit if they need advice or information: Contact: 020 7008 0151 or email [fmufco.gov.uk](mailto:fmufco.gov.uk).

### **Child Sexual Exploitation**

Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology. A multi-agency team led by Birmingham City Council and West Midlands Police provide support to victims and those identified as being at risk of CSE. 0121 3030 1888 out of hours 0121 675 4806.

### **Children who run away or who are missing from home**

There are no exact figures for the number of children who go missing or run away, but estimates suggest that the figure is in the region of 100,000 per year. Children may run away from a problem, such as abuse or neglect at home, or to somewhere they want to be. They may have been coerced to run away by someone else. Whatever the reason, it is thought that approximately 25 per cent of children and young people that go missing are at risk of serious harm. There are particular concerns about the links between children running away and the risks of sexual exploitation. Missing children may also be vulnerable to other forms of exploitation, to violent crime, gang exploitation, or to drug and alcohol misuse. Although looked after children are particularly vulnerable when they go missing, the majority of children who go missing are not looked after and go missing from their family home. They can face the same risks as a child missing from local authority care.

## Domestic Abuse

The Home Office defines domestic abuse as "Any incident or pattern of incidents of controlling, coercive or threatening behaviour, violence or abuse between those aged 16 years old or over who are or have been intimate partners or family members regardless of gender or sexuality. This can encompass but is not limited to the following types of abuse:

- Psychological
- Physical
- Sexual
- Financial
- Emotional

Controlling behaviour is: a range of acts designed to make a person subordinate and/or dependent by isolating them from sources of support, exploiting their resources and capacities for personal gain, depriving them of the means needed for independence, resistance and escape and regulating their everyday behaviour. Coercive behaviour is: an act or a pattern of acts of assault, threats, humiliation and intimidation or other abuse that is used to harm, punish, or frighten their victim." Children who live in households where domestic violence is taking place are seen to be highly vulnerable due to the result of direct abuse or by bearing witness to the abuse of others. Domestic abuse hotline 0808 2000 247.

## Radicalisation

Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups. Some young people may be vulnerable to radicalisation for the purpose of violent extremism. 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, radicalisation can occur through many different methods (such as social media or the internet) and settings (such as within the home).

- **Extremism** is the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces.
- **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.

Concerns regarding radicalisation will be referred to the Safeguarding team using [My Concern](#) who will liaise with the Multi Agency Safeguarding Hub (MASH) and/or the Counter Terrorist Unit (CTU) for advice. If appropriate, a referral will then be made to Channel which is a multi-agency panel who will offer guidance and support with the aim of preventing activity which could be deemed as criminal. The Counter Terrorist Unit (CTU) will be advised of any emerging themes or immediate concerns/disclosures.

## Financial or Material Abuse

This relates to circumstances where trust in relation to financial matters is abused. Includes theft, fraud, exploitation, pressure in connection with wills, property or inheritance or financial transactions, or the misuse or misappropriation of property, possessions or benefits.

## Peer on Peer Abuse

Children are capable of abusing their peers and this is known as peer on peer abuse. This is most likely to include, but not limited to:

- bullying (including cyber bullying);
- physical abuse, such as, hitting, kicking, shaking, biting, hair pulling or otherwise causing physical harm;
- sexual violence, such as rape, assault by penetration and sexual assault;
- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment which may be stand-alone or part of a broader pattern of abuse;
- Upskirting – which typically involves taking a picture under a person’s clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification or cause the victim humiliation, distress or alarm. This is now a criminal offence
- sexting (also known as Youth Produced Sexual Imagery - YPSI)
- initiation/hazing type violence and rituals

Research indicates that girls and young women are more frequently identified as those who are abused by their peers, whereas boys and young men are more likely to be identified as abusers. However, boys and young men report high levels of victimisation in gang-affected neighbourhoods. While young men and young women experience peer-on peer abuse they do so in gendered ways.

Peer on peer abuse will be minimised by students understanding Ready, Respectful, Safe, British Values and the College’s inclusive and strong approach to Equality and Diversity. A diverse range of enrichment activities and tutorial delivery will also underpin values and teaching of safeguarding using elements of the [Relationships & Sex Education](#) statutory guidance for schools.

Peer on peer abuse will not be tolerated and should never be defined as “banter, having a laugh or part of growing up”. Instances of Peer on peer abuse will be dealt with through the appropriate policies and procedures e.g. Ready, Respectful, Safe Policy, Disciplinary Procedure and Child Protection and Safeguarding Policy.

## Child on Child Sexual Violence and Sexual Harassment

Sexual violence and sexual harassment can occur between two children of any age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and offline (both physically and verbally) and are never acceptable. It is important that all victims are taken seriously and offered appropriate support. We should not tolerate or dismiss sexual violence or sexual harassment as “banter”, “part of growing up”, or “just having a laugh”.

Staff should be aware that some groups are potentially more at risk. Evidence shows girls, children with SEND and LGBT children are at greater risk Further information and guidance can be found in the [DfE Guidance Sexual Violence and Sexual Harassment between Children in Schools and Colleges](#). When referring to sexual violence we are referring to sexual offences under the Sexual Offences Act 2003, which are, rape, assault by penetration and sexual assault. When referring to sexual harassment we mean ‘unwanted conduct of a sexual nature’ that can occur online and offline and 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.

## Serious Violence

All staff should be aware of indicators, which may signal that children are at risk from, or are involved



with serious violent crime. These may include, increased absence from College, a change in 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. All staff should be aware of the associated risks and understand the measures in place to manage these. Advice for schools and colleges is provided in the [Home Office's Preventing Youth Violence and Gang Involvement and the Criminal Exploitation of children and vulnerable adults: county lines guidance](#).

### **Bullying (Cyberbullying)**

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

- Emotional: Being excluded, tormented (e.g. hiding things, threatening gestures).
- Physical: Pushing, kicking, punching or any use of aggression and intimidation.
- Racial: Racial taunts, use of racial symbols, graffiti, gestures.
- Sexual: Unwanted physical contact, sexually abusive comments including homophobic comments and graffiti.
- Verbal: Name calling, spreading rumours, teasing.
- Cyber: All areas on internet, such as email and internet, chat room misuse. Mobile threats by text message and calls. Misuse of associated technology i.e. camera and video facilities, sexting (YPSI).

### **YPSI (Youth Produced Sexual Imagery)**

Sexting (YPSI) is defined as the production and/or sharing of sexual photos and videos of and by young people who are under the age of 18. It includes nude or nearly nude images and/or sexual acts. It is also referred to as 'youth produced sexual imagery' 'Sexting' does not include the sharing of sexual photos and videos of under-18 year olds with or by adults. This is a form of child sexual abuse and must be referred to the police. Staff will never view, download or share the imagery, or ask a child to share or download it – this is illegal. If staff have viewed the imagery by accident (e.g. if a young person has shown it before being asked not to), this must be reported to the Safeguarding Team.

- Parents should be informed at an early stage and involved in the process unless there is good reason to believe that involving parents would put the young person at risk of harm.
- At any point in the process if there is a concern a young person has been harmed or is at risk of harm a referral should be made, by the Safeguarding Team, to children's social care and/or the police immediately.
- In some cases, the incident can be handled internally without Police involvement. Please see "[Sexting in Schools and Colleges – Responding to Incidents and Safeguarding Young People](#)" for further information.

### **Private Fostering**

Private fostering is an arrangement made privately (without the involvement of a local authority) for the care of a child under the age of 16 (under 18, if disabled) by someone other than a parent or close relative with the intention that it should last for 28 days or more. Private foster carers may be from the extended family, such as a cousin or great aunt. However, a person who is a relative under the Children Act 1989 i.e. a grandparent, brother, sister, uncle or aunt (whether full or half blood or by marriage) or step-parent will not be a private foster carer.

A private foster carer may be a friend of the family, the parent of a friend of the child, or someone previously unknown to the child's family who is willing to privately foster a child. Local authorities

have a duty to satisfy themselves that the welfare of children who are, or will be, privately fostered within their area is being, or will be, satisfactorily safeguarded and promoted.

If you are aware of any student who you feel maybe being privately fostered, please notify the DSL.

### **Students with Special Educational Needs (SEND)**

Students with special educational needs and disabilities can face additional safeguarding challenges. Hate crime against disabled people is said to be on the rise, including so-called "mate crime", where people pretend to befriend a vulnerable person, while secretly stealing from or abusing them.

Students within this cohort can be disproportionately impacted by things like bullying without showing any signs. All staff should be vigilant to ensure that they are mindful of signs of abuse which could include changes in behaviour, mood and/or injury and should be aware that there may be communication barriers which may make it more difficult for these students to share concerns and issues.

### **Child Criminal Exploitation**

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

### **County Lines**

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one or more importing areas [within the UK], using dedicated mobile phone lines or other form of "deal line". Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to move [and store] drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. One of the ways of identifying potential involvement in county lines are missing episodes (both from home and college), when the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism should be considered. If a child is suspected to be at risk of or involved in county lines, a safeguarding referral should be considered alongside consideration of availability of local services/third sector providers who offer support to victims of county lines exploitation.

### **Homelessness**

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property. In most cases we will be considering homelessness in the context of children who live with their families, and intervention will be on that basis. However, it should also be recognised in some cases 16 and 17 year olds could be living independently from their parents or guardians, for example through their exclusion from the family home and will require a different level of intervention and support. Children's services will be the lead agency for these young people and appropriate referrals should be made based on the child's circumstances.

### **Online Safety**

The use of technology has become a significant component of many safeguarding issues. Child

sexual exploitation; radicalisation; sexual predation: technology often provides the platform that facilitates harm. An effective approach to online safety empowers the College to protect and educate the College community in their use of technology and establishes mechanisms to identify, intervene in and escalate any incident where appropriate. The breadth of issues classified within online safety is considerable, but can be categorised into three areas of risk:

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

## **Children and the Court System**

Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. Making child arrangements via the family courts following separation can be stressful and entrench conflict in families. This can be stressful for children. We will recognise these vulnerabilities and offer early help where necessary for the children, young people and their families to safeguard emotional wellbeing and access resources as defined in Keeping Children Safe in Education September 2019.

## **Children with Family Members in Prison**

These children are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. We will work with the children and their families as much as possible to mitigate the harm by offering early help and emotional wellbeing support where necessary and recognise additional risks such as witnessing arrests, trauma of prison visits, concerns regarding an offenders' release and return home.

## **Mental Health**

Children exposed to multiple risks such as social disadvantage, family adversity and cognitive or attention problems are much more likely to develop behavioural problems and may have other traumatic adverse childhood experiences. We recognise that these have a lasting impact through adolescence and into adulthood. In order to help students succeed, we have a role to play in supporting them to be resilient and mentally healthy. In addition to the Safeguarding team and a range of extra-curricular activities to support positive mental wellbeing, we provide training for staff to raise awareness of the signs of mental distress and we have qualified Counsellors who can provide support to students.

## **Children missing from education**

A child going missing from education is a potential indicator of abuse and neglect, including sexual abuse, sexual exploitation and can also be a sign of child criminal exploitation including involvement in county lines. It may also be an indicator of mental health problems risk of substance misuse, FGM and forced marriage. The college operates an attendance hotline and attendance monitors support in the follow up of young people who are missing in education. The college requests two emergency contact numbers for all learners aged under 18.

## **Reasonable Force**

There are circumstances when it is appropriate for our staff to use reasonable force to safeguard children and young people. The term 'reasonable force' covers the broad range of actions used by staff that involve a degree of physical contact to control or restrain children. This can range from guiding a child to safety by the arm, to more extreme circumstances such as breaking up a fight or

where a young person needs to be restrained to prevent violence or injury. 'Reasonable' in these circumstances means 'using no more force than is needed'. The use of force may involve either passive physical contact, such as standing between pupils or blocking a pupil's path, or active physical contact such as leading a pupil by the arm out of the classroom. When using reasonable force in response to risks presented by incidents involving children with SEN or disabilities or with medical conditions we will consider the risks carefully and recognise the additional vulnerability of these children.

### Useful links and further information

Below are lists of links that will provide further, expert and up to date information from professional organisations. Referral to Children's Advice and Support Services (CASS) is required on 0121 238 1888 or via secure email [CASS@birminghamchildrenstrust.co.uk](mailto:CASS@birminghamchildrenstrust.co.uk).

- [Child Sexual Exploitation \(CSE\)](#)
- [Bullying including cyberbullying](#)
- [Child missing from Education](#)
- [Child missing from home or care](#)
- [Contextual Safeguarding](#)
- [County Lines Guidance](#)
- [Domestic violence](#)
- [Drugs](#)
- [Educate Against Hate](#)
- [Effects of Domestic Violence on Children](#)
- [Fabricated or induced illness](#)
- [Faith abuse](#)
- [Female Genital Mutilation \(FGM\)](#)
- [Forced marriage](#)
- [Gangs and Youth Violence](#)
- [Gender-based violence/violence against women and girls \(VAWG\)](#)
- [Mental Health](#)
- [Mental Health in and behaviour in schools guidance](#) (of use to colleges)
- [Missing Children and Adults Strategy](#)
- [Modern Slavery & Human Trafficking](#)
- [National Information Centre on Children of Offenders](#)
- [Private Fostering](#)
- [Preventing radicalisation](#)
- [Relationship abuse, Sexting \(YPSI\)](#)
- [Teaching Online Safety](#)
- [When to call the Police](#)

## **Roles and Responsibilities - Safeguarding**

### **The Principal**

The Principal will ensure that:

- The policies and procedures adopted by the Governing Body are fully implemented and followed by all staff. Whilst the Governing Body holds overall responsibility for the child protection and safeguarding functions of the College, the day to day operational responsibility rests with the Principal and the Designated Safeguarding Lead who takes delegated duty from the Principal.
- Sufficient resources and time are allocated to enable the Designated Safeguarding Leads/Designated Persons and other staff to be able to perform their duties.
- All staff and volunteers feel able to raise concerns about poor practice, and concerns are addressed sensitively and effectively in a timely manner.

### **Designated People with Responsibility for Child Protection and Safeguarding**

Designated Personnel with responsibility for Child Protection are:

- Designated Safeguarding Lead (DSL): Kay Burton-Williams
- Deputy Safeguarding Persons: Claire Harvey, Ianthe Wassell
- Governor with responsibility for Safeguarding and Child Protection issues: Veronica Doherty
- Designated Safeguarding Deputies: Vice Principals (Anna Jackson, Jan Myatt, Ben Gamble), Sonia Crook-Lake, Katie Dyer, Lisa Underwood, Taher Hussain.

The Designated Safeguarding Lead is responsible for:

- Observing the BSCP procedures with regard to referring a child or vulnerable young adult if there are concerns about possible abuse.
- Providing advice and support to other staff on issues relating to safeguarding and child protection.
- Keeping records of all concerns about a child or vulnerable young adult even if there appears to be no need to make an immediate referral.
- Liaison and joint working with Social Care Services, BSCP, LADO, Police and other relevant agencies. Overseeing the referral of cases of suspected abuse or allegations to the relevant investigating agencies as agreed with BSCP.
- Help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children, including children with a social worker, are experiencing, or have experienced, with relevant staff and college leadership staff. Their role includes ensuring that the college, and their staff, know who these children are, understand their academic progress and attainment and maintain a culture of high aspirations for this cohort; supporting teaching staff to identify the challenges that children in this group might face and the additional academic support and adjustments that they could make to best support these children.
- Ensuring that parents/carers/employers of children and vulnerable young people within the College are aware of the College's Child Protection and Safeguarding Policy how to access this via the college website.
- Liaison with secondary schools which send pupils to the College to ensure that appropriate arrangements are made for the pupils.
- Liaison with secondary schools and Pupil Referral Units to receive and action safeguarding files from compulsory education.
- Liaison takes place with employers and training providers that receive children and young people from the college on long term placements to ensure appropriate safeguards are put in place.

- Ensuring that staff and governors receive basic training in safeguarding and child protection issues and are aware of the College Safeguarding and Child Protection procedures.
- Ensuring the Deputy Safeguarding Persons and Designated Safeguarding staff are appropriately trained and in the absence of the DSL and carry out those functions necessary to ensure ongoing protection and safety of students.

### **The Nominated Child Protection Governor**

The Nominated Governor is responsible for liaising with the DSL regarding child protection issues, including:

- Ensuring that the College has procedures and policies which are consistent with BSCP procedures.
- Ensuring that the Governing Body considers the College Policy on Child Protection and Safeguarding each year.
- Ensuring that each year the Governing Body is informed of how the College and its staff have complied with the policy, including but not limited to a report on the training that staff have undertaken.

The Designated Governor is responsible for overseeing the liaison between agencies such as the police and social services - as defined by the BSCP in connection with allegations against the Principal. This will not involve undertaking any form of investigation but will ensure good communication between the parties and provide information to assist enquiries.

### **Other Designated Staff Members**

There are safeguarding champions within curriculum directorates and support areas across all BMet sites. These designated staff members will:

- report to the DSL/Deputies with lead responsibility;
- know how to make an appropriate referral using the college system [My Concern](#) and how to support all staff to make referrals via this system;
- be available to provide advice and support to other staff on issues relating to safeguarding and child protection;
- have particular responsibility to be available to listen to children and vulnerable young people studying at the College;
- deal with individual cases, including attending case conferences and review meetings as appropriate;
- have received training in safeguarding and child protection issues.

### **The role of staff and other persons within the College**

All staff have a duty to safeguard children and vulnerable adults. To carry out this duty they need to be:

- trained and aware of potential indicators of abuse;
- open to hearing concerns from children and others, without seeking to investigate these concerns.
- Informed on how to report concerns through the college referral system [My Concern](#)
- informed on how to report any concerns where there is immediate risk of harm to the DSL/Deputies.

## **Roles and Responsibilities – Preventing Extremism and Radicalisation**

### **Designated Safeguarding Lead**

The Designated Safeguarding Lead will act as the Prevent Single Point of Contact (SPOC) who will liaise

with the police, social services or Counter Terrorism Unit when required.

The Designated Safeguarding Lead (DSL)/ Single Point of Contact (SPOC) may in certain circumstances take the decision to report any suspicious activity or concerns relating to violent extremism to the Police Counter Terrorism Unit. Any prejudice, discrimination or extremist views, including derogatory language, displayed by students or staff will always be challenged and where appropriate dealt with in line with our Disciplinary Procedure for students and the Disciplinary Procedure for staff.

### **All Staff**

As part of wider safeguarding responsibilities College staff will be alert to:

- Disclosures by students of their exposure to the extremist actions, views or materials of others outside of College, such as in their homes or community groups, especially where students have not actively sought these out;
- Graffiti symbols, writing or art work promoting extremist messages or images;
- Students accessing extremist material online, including through social networking sites;
- Parental reports of changes in behaviour, friendship or actions and requests for assistance;
- Partner Colleges, local authority services, and police reports of issues affecting students in other Colleges or settings;
- Students voicing opinions drawn from extremist ideologies and narratives;
- Use of extremist or hate terms to exclude others or incite violence;
- Intolerance of difference, whether secular or religious or, in line with our equalities policy, views based on, but not exclusive to, gender, disability, homophobia, race, colour or culture;
- Attempts to impose extremist views or practices on others which are contrary to fundamental British values.

### **Training Child Protection/Safeguarding & Preventing Radicalisation and Extremism**

- The DSL/Deputies will undertake DSL training in Safeguarding and Child Protection issues and interagency working as required by the BSCP every 2 years. Other staff will receive appropriate Safeguarding and Child Protection training each year.
  - All staff will undertake level 1 safeguarding training annually via Skillgate.
  - In addition, safeguarding champions will undertake level 2 training annually via Skillgate.
- In addition, staff with designated safeguarding responsibility will receive training updates on specific safeguarding and child protection issues via BSCP training events and briefings.
- With regard to preventing extremism and radicalisation mandatory training for all staff will be available via Skillgate.
- Human Resources will keep a record of all Safeguarding and Preventing radicalisation training completed within the Single Central Record.

### **Looked After Children and Previously Looked After Children**

The most common reason for children becoming looked after is as a result of abuse / neglect. Staff should have the skills, knowledge and understanding to keep looked after children safe. Staff need information in relation to a looked after child's legal status (whether they are looked after under voluntary arrangements or with the consent of parents or on and interim or full care order) and contact arrangements with birth parents or those with parental responsibility. Information should be available on care arrangements and the level of authority delegated to the carer by the authority looking after him/her.

A previously looked after child potentially remains vulnerable and all staff should have the skills, knowledge and understanding to keep previously looked after children safe. It is important that all agencies work together, and that prompt action is taken.

The designated teacher for students who are looked after will work with local authorities to promote the educational achievement of looked after children, this will include those who have left care through adoption, special guardianship or child arrangement orders or who were adopted from state care outside of England and Wales. The designated teacher will work with the virtual school head where appropriate. The Vice Principals supported by the DSL are the Designated Teachers for BMet with delegated responsibility given to the following roles / staff on a day to day basis for the administration of Personal Education Plan meetings and day to day liaison.

- James Watt College:                   Katie Dyer                   Student Experience Coordinator  
  Claire Harvey               Student Experience Manager
- Matthew Boulton College:       Lisa Underwood           Student Experience Coordinator  
  Ilanthe Wassell           Student Experience Manager
- Sutton Coldfield College:       Sonia Crook-Lake       Student Experience Coordinator  
  Kay Burton-Williams   Director Student Experience (DSL)

### **Co-ordinating Arrangements – Safeguarding and Radicalisation**

Overall co-ordination of policy and practice for child protection, safeguarding and radicalisation will be achieved through a Safeguarding Thematic Committee with the following terms of reference:

- Assist the Governing Body and Principal to discharge their responsibilities under any relevant safeguarding and Prevent legislation and responsibilities;
- Ensure that Safeguarding is taken into account in all strategic planning processes;
- Establish and maintain policies relating to Safeguarding, Child Protection and Prevent;
- Respond to any initiatives in safeguarding and the Prevent agenda and to promote developments;
- Check that Safeguarding and Prevent policies and procedures are in place and statutory training has taken place including Out of College Visits and Activities Procedure;
- Ensure the College is fulfilling its responsibilities regarding Safeguarding and Child Protection and Prevent;
- Ensure effective dissemination of Child Protection, Safeguarding and Prevent policies, procedures and guidelines to staff, students and other stakeholders;
- Ensure appropriate members of staff complete the training course on safer recruitment
- Ensure that the College follows Safe Recruitment practices and has a formal induction programme for all new staff member;
- Provide support and guidance for SLT on all matters relating to Safeguarding and Child Protection and Prevent, to ensure the College complies with Health & Safety Regulations and statutory guidance relevant to safeguarding;
- Ensure that formal DBS checks are carried out for all new members of staff and that the college maintains a 'Single Central record' for inspection purposes;
- Ensure that appropriate software and procedures are in place to facilitate keeping learners safe online;
- Assist the DSL in maintaining detailed procedures for dealing with allegations of abuse and the reporting of concern.



# **Safeguarding Procedure**

## Safeguarding and Prevent Procedures inc guidance notes

### Dealing with Disclosure of Abuse and Procedure for Reporting Concerns (Appendix 1)

It is important to remember that safeguarding incidents could happen anywhere, and all staff should be alert to possible concerns being raised in College. What to do if a learner tells a member of staff about possible abuse:

- Listen carefully and stay calm. Treat the matter seriously.
- Questions should be kept to the minimum necessary to understand what is being alleged. Care must be taken in asking or interpreting responses to questions about indications of abuse, as this could have an effect on the evidence which is put forward if there are subsequent legal proceedings.
- Reassure the learner that by telling you, they have done the right thing. Promises of confidentiality must not be given.
- Inform the learner that you must pass the information on, but that only those who need to know about it will be told. Inform them whom you will report the matter to. If possible, use a silent witness.
- Full details of the disclosure should be reported as soon as possible by raising a concern on [My Concern](#).

Note the main points carefully:

- The name of the complainant, and where different, the learner who has allegedly been abused;
- When and where the alleged incident(s) took place, including date(s) and time(s) who was present;
- The account of what is alleged to have happened;
- A description of any injuries observed.

Staff must not investigate concerns or allegations themselves but should report them immediately using [My Concern](#) and in cases of concern of immediate harm also inform the DSL or Deputy Safeguarding Persons who will help staff decide what to do next.

Options include:

- Managing support internally via the Colleges own pastoral processes;
- Early help assessment; or
- A referral for statutory services, for example as the child is in need or suffering or likely to suffer harm.

If in exceptional circumstances the Designated Safeguarding Lead or Deputies are not available, this should not delay appropriate action being taken. Where a child is suffering, or is likely to suffer from harm, it is important that a referral is made to children's social care (and if appropriate the police) is made immediately.

**Never**            Ask leading questions  
                      Ask the child or vulnerable adult to write down their account  
                      Investigate with or without others, take photographs of marks, arrange for a medical examination

Staff should always be aware of their own vulnerability and should take steps to minimise the risk to themselves whilst supporting the child or vulnerable young person (Appendix 2 Safe working code of conduct).

We recognise that all matters relating to safeguarding and child protection are confidential. The DSL will disclose any information about a learner to other members of staff only on a need-to-know basis. All concerns will be received by the DSL who will seek advice/make a judgement as to whether a referral to Social Care Services or the police or any other action is necessary. This includes situations where any professional feels that a young person has abused another child or young person.

## **Notifying Parents**

The College will normally seek to discuss any concerns about a child or vulnerable young person with their parents/carers. This must be handled sensitively, and the DSL or Deputies will make contact with the parents/carers in the event of a concern, suspicion or disclosure. However, if the College believes that notifying parents/carers could increase the risk to a child or vulnerable young person, or even exacerbate the problem, and then advice will first be sought from local Children's Advice & Support Service (CASS) on 0121 303 1888 or via secure email [CASS@birminghamchildrenstrust.co.uk](mailto:CASS@birminghamchildrenstrust.co.uk).

## **Reporting directly to Child Protection Agencies**

Staff should follow the reporting procedures outlined in this policy. However, they may also share information directly with children's social care, police or the NSPCC if the situation is an emergency and the DSL, and the Deputies are all unavailable.

## **Supporting Staff**

We recognise that staff working in the College who have become involved with a child or vulnerable young person who has suffered harm or who is likely to suffer harm may find the situation stressful and upsetting. We will support such staff by providing an opportunity to talk through their anxieties with the DSL or Deputies and to seek further support as appropriate.

## **Death of a Student in Learning**

In the unfortunate case of a death of a student in learning the College has a procedure which can be found in Appendix 5.

## **Children and Young People who abuse others**

Children are vulnerable to abuse by their peers. Such abuse should be taken as seriously as abuse by adults and should be subject to the same child protection procedures. Practitioners should not dismiss abusive behaviour as normal between young people and should not develop high thresholds before taking action. Sexual violence and sexual harassment can occur between two children of any sex. They can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.

Sexual violence refers to sexual offences as described under the Sexual Offences Act 2003. This includes: rape, assault by penetration and sexual assault. The advice sets out that sexual harassment is 'unwanted conduct of a sexual nature' that can occur online and offline. It is likely to violate a child's dignity, and/or makes them feel intimidated, degraded or humiliated and/or creates a hostile, offensive or sexualised environment.

Children with Special Educational Needs and Disabilities (SEND) can be especially vulnerable. Disabled and deaf children are three times more likely to be abused than their peers. Additional barriers can sometimes exist when recognising abuse in SEND children.

Particular difficulties arise in responding to a child or young person who abuses another child because:

- There is no clear dividing line between abusive behaviour and normal childhood behaviour;
- Many adults who abuse children repeatedly established this pattern of behaviour in childhood or adolescence, but a single incident of abuse does not indicate that a young person is likely to abuse again; and
- Some young people who abuse have themselves been abused, but this cannot be assumed in any particular case.

The needs of the victim and the needs of the alleged perpetrator must be considered separately. In addition to safeguarding the identified victim, agencies must consider whether the alleged perpetrator seems to pose a risk to any other children. Children and young people who abuse others are responsible for their abusive behaviour, and safeguarding action must include addressing their behaviour and its causes. The alleged perpetrator is likely to have considerable unmet needs as well as posing a significant risk of harm to other children. There is no clear boundary between incidents which should be regarded as abusive and incidents which are properly dealt with as bullying, sexual experimentation etc. Issues relating to the safety of victims and potential victim must be discussed first and completely separately from any issues relating to the alleged perpetrator.

If one child or young person causes harm to another, this should not necessarily be dealt with under these procedures: bullying, fighting and harassment between children are not generally seen as child protection issues. However, it may be appropriate to regard a young person's behaviour as abusive if:

- There is a large difference in power (e.g. age, size, ability, development) between the young people concerned; or
- The perpetrator has repeatedly tried to harm one or more other children; or there are concerns about the intention of the alleged perpetrator.

Staff should also be aware that the abuse could be related to:

- Sexual activity
- Group behaviour - there may be evidence suggesting that two or more abusers have acted together, and/or that more than one child has been abused.
- Cyberbullying - potential uses of information technology for bullying and abusive behaviour between young people.
- Victims of crime - there is the added vulnerability of children and young people who have been the victim of violent crime, including the risk that such young people may respond to this by abusing other, younger or weaker children.
- Gangs - children and young people may be vulnerable to abuse by other young because of gang activity in the area.

## **Reporting and Dealing with Allegations of Abuse Against Members of Staff**

In rare instances, staff of education institutions have been found responsible for safeguarding or child abuse. Because of their frequent contact with children and vulnerable young people, staff may have allegations of child abuse or a safeguarding issue made against them. The College recognises that an allegation of child abuse or any other safeguarding allegation 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 investigation is thorough and not subject to delay.

The College recognises that the Children's Acts of 1989 and 2004 state 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. This is also supported by the [Safeguarding Vulnerable Groups Act of 2006](#).

## **Receiving an Allegation from a Child or Vulnerable Young Person (Appendix 1 & Appendix 3)**

- A member of staff who receives an allegation about another member of staff from a child or vulnerable young person should follow the guidelines in appendix 1 for dealing with disclosure.
- The allegation should be reported immediately to the Designated Safeguarding Lead /Director of Human Resources, unless the Principal is the person against whom the allegation

is made, in which case the report should be made to the nominated Safeguarding Governor/Designated Safeguarding Lead, these individuals 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.

- Record information about times, dates, locations and names of potential witnesses.

## **Referral and Intervention Processes for Radicalisation and Extremism**

The Association of Chief Police Officers (ACPO) guidance provides a model referral process for children and young people who are vulnerable to radicalisation and/or who may be at risk through living with or being in direct contact with known extremists. A model flowchart for referral of Children and Young People for Concerns of Radicalisation in Children's Services can be found in Appendix 1.

Staff working with children should use this model to assist them in identifying and responding to concerns about children who may be vulnerable to being drawn into violent extremist activity. Any member of staff who identifies such concerns, for example as a result of observed behaviour or reports of conversations to suggest the child supports terrorism and/or violent extremism, must report these concerns using [My Concern](#) and also inform the Designated Safeguarding Lead for Child Protection, who will consider what further action is required.

As set out in the flowchart, the named or designated professional must discuss any such concerns with the local police/CTU. After consultation with the police and in light of any further information gathered about the child and the family, if it is considered there are grounds for further involvement, a multi-agency assessment meeting (usually involving the child, parents and relevant professionals) should be convened to determine the appropriate response and how this should be delivered.

The aim is to ensure an early identification of children's vulnerabilities and promote a coordinated response, wherever possible within universal provision or through targeted interventions and the Early Help Assessment process. The emphasis should be on supporting vulnerable children and young people, rather than informing on or "spotting" those with radical or extreme views. In exceptional cases, it may be considered that a child or young person is involved or potentially involved in supporting or pursuing extremist behaviour. This may be, for example, where the child is part of a family with known extremists (e.g. people who are currently subject to criminal proceedings or who have been convicted of terrorism related offences.) Where this is the case, a referral must be made to Children's Services under the Referrals Procedure and the police must be informed. Further investigation by the police will be required, prior to other assessments and interventions.

While the nature of the risk may raise security issues, the process should not be seen as different from dealing with the likelihood of significant harm or vulnerability due to the exposure to other influences. Consideration should be given to the possibility that sharing information about the concerns with the parents may increase the risk to the child and therefore may not be appropriate at the referral stage.

Consideration should also be given to the need for an emergency response - this will be extremely rare, but examples are where there is information that a violent act is imminent or where weapons or other materials may be in the possession of a young person or member of his or her family. In this situation a 999 call must be made. Where there is involvement as a result of the concerns, any provision of services should be subject to regular reviews until it is deemed appropriate to end the agreed response.

## **Assessment**

The Early Help Assessment process remains the primary vehicle for assessing vulnerable young people, including those who may be vulnerable to violent extremist messages. However, where a referral is made to Children's Services, given the complexity of this issue and the need to access

materials that may only be available within the appropriate Counter Terrorism Unit, cases will be subject to an initial Vulnerability Assessment as identifying vulnerabilities is necessary for effective intervention and the understanding of individual risk management.

Information received from the Channel Team will be used to guide the decision-making process. Most children and young people do not become involved in violent extremism. Numerous factors can contribute to and influence the range of behaviours that are defined as violent extremism. Therefore, in many cases interventions identified through the Channel process may not appear to be specific to the threat of radicalisation. For example, they might relate to other needs of the individual such as in respect of mental health support, housing, relationships, offending behaviour or drug and alcohol issues. There may however sometimes be a need for specialist interventions in relation to de-radicalisation and disengagement. These will be commissioned as required.

## **Understanding and Recognising Risks and Vulnerabilities of Radicalisation**

Children and young people can be drawn into violence or they can be exposed to the messages of extremist groups by many means. These can include through the influence of family members or friends and/or direct contact with extremist groups and organisations or, increasingly, through the internet. This can put a young person at risk of being drawn into criminal activity and has the potential to cause Significant Harm. The risk of radicalisation is the product of a number of factors and identifying this risk requires that staff exercise their professional judgement, seeking further advice as necessary. It may be combined with other vulnerabilities or may be the only risk identified.

Potential indicators of an individual becoming radicalised include:

- Use of inappropriate language;
- Possession of violent extremist literature;
- Behavioural changes;
- The expression of extremist views;
- Advocating violent actions and means;
- Association with known extremists;
- Seeking to recruit others to an extremist ideology.

Research shows that indicators of vulnerability which may make an individual susceptible to being radicalised can include:

- Identity Crisis - Distance from cultural/religious heritage and uncomfortable with their place in the society around them;
- Personal Crisis - Family tensions; sense of isolation; adolescence; low self-esteem; disassociating from existing friendship group and becoming involved with a new and different group of friends; searching for answers to questions about identity, faith and belonging;
- Personal Circumstances - Migration; local community tensions; events affecting country or region of origin; alienation from UK values; having a sense of grievance that is triggered by personal experience of racism or discrimination or aspects of Government policy;
- Unmet Aspirations - Perceptions of injustice; feeling of failure; rejection of civic life;
- Criminality - Experiences of imprisonment; poor resettlement/reintegration; previous involvement with criminal groups;
- Being in contact with extremist recruiters;
- Articulating support for violent extremist causes or leaders;
- Accessing violent extremist websites, especially those with a social networking element;
- Possessing or accessing violent extremist literature;
- Using extremist narratives and a global ideology to explain personal disadvantage;
- Justifying the use of violence to solve societal issues;
- Joining or seeking to join extremist organisations; Significant changes to appearance and/or behaviour;

- However, this list is not exhaustive, nor does it mean that all young people experiencing the above are at risk of exploitation for the purposes of violent extremism.

## **External Speakers and Events**

The Government Prevent Duty Guidance, September 2015, requires Colleges to ensure they have risk assessment processes for speakers and ensure those espousing extremist views do not go unchallenged. This procedure is in Appendix 4.

## **Local support**

Locally, the following organisations are able to provide additional advice and guidance in relation to safeguarding individuals vulnerable to radicalisation and children who may be at risk through living with or being in direct contact with known extremists:

All concerns should be reported to the Designated Safeguarding Lead and Single Point of Contact: Kay Burton-Williams 07779 328630.

Counter Terrorism Policing (Action Counters Terrorism) report a concern [online](#) or call 0800 789 321.

## **Disclosure of concern (In Position of Trust)**

All staff should be aware of their duty to raise concerns, where they exist, about the management of child protection, which may include the attitude or actions of colleagues. If it becomes necessary to consult outside the College, they should speak in the first instance, to the Local Authority Designated Officer (LADO).

Concerns regarding the Principal should be made to the Nominated Governor and the DSL. Initial assessment will be carried out by the Director of Human Resources (DHR).

The DHR should make an initial assessment of the allegation, consulting with the DSL, the Designated Governor and the BSCP. Where the allegation is considered to be either a potential criminal act or indicates that the child has suffered, is suffering or is likely to suffer significant harm, the matter should be reported immediately to the BSCP. In the case of third party workers the college will take the lead in liaison with the LADO, BCSP and/or the Police in line with KCSE 2020 para 216.

It is important that the DHR does not investigate the allegation. The initial assessment should be on the basis of the information received and is a decision whether or not the allegation warrants further investigation. Other 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 or vulnerable young person. The matter should be addressed in accordance with the College disciplinary procedures.
- The allegation can be shown to be false because the facts alleged could not possibly be true.

## **Enquiries and Investigations**

- Child protection and vulnerable adult enquiries by social services or the police are not to be confused with internal, disciplinary enquiries by the College. The College may be able to use the outcome of external agency enquiries as part of its own procedures. The child protection and safeguarding 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 the formal police or social

services investigations proceed; to do otherwise may prejudice the investigation. Any internal enquiries shall conform to the existing staff disciplinary procedures.

- If there is an investigation by an external agency, for example the police, the DSL should normally be involved in, and contribute to, the inter-agency strategy discussions. The DSL is responsible for ensuring that the College gives every assistance with the agency's enquiries. The DSL 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. The DSL shall advise the member of staff that they should consult with a representative, for example, a trade union.

Subject to objections from the police or other investigating agency, the DSL shall:

- Inform the child/children/vulnerable adult or parent/carer making the allegation that the investigation is taking place and what the likely process will involve.
- Ensure that the parents/carers of the child/vulnerable adult making the allegation have been informed that the allegation has been made and what the likely process will involve.
- Inform the member of staff against whom the allegation was made of the fact that the investigation is taking place and what the likely process will involve.
- Inform the Designated Governor of the allegation and the investigation.
- The DSL shall keep an electronic record of the action taken in connection with the allegation.

Suspension should only occur for a good reason. For example: where a child/vulnerable adult is deemed to be at risk; where the allegations are potentially 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.

If the member of the Senior Leadership Team considers that suspension is necessary, the member of staff shall be informed that they are suspended from duty. Written confirmation of the suspension, with reasons, shall be dispatched as soon as possible and ideally within one working day. Where a member of staff is suspended, the following issues should be addressed:

- The Nominated Governor should be notified
- Where the 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 making the allegation should be informed of the suspension.
- They should be asked to treat the information as confidential. Consideration should be given to informing the child making the allegation of the suspension.
- Senior staff who need to know of the reason for the suspension should be informed. Depending on the nature of the allegation, the Principal should consider with the nominated Governor whether a statement to the learners of the College and/or parents/carers should be made, taking due regard of the need to avoid unwelcome publicity.
- The Senior Leadership staff member who authorised suspension shall consider carefully and review the decisions as to who is informed of the suspension and investigation. The BSCP and external investigating authorities should be consulted by the DSL.
- Inform the member of staff against whom the allegation is made orally and in writing that no further disciplinary or child protection action will be taken. Consideration will be given to offering counselling/support.
- Inform the parents/carers of the alleged victim that the allegation has been made and 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 had been taken.



## **Safeguarding Leadership Team**

The Designated Safeguarding Lead is

- Kay Burton-Williams (Director of Student Experience)

The Deputy Safeguarding Persons are

- Claire Harvey (Student Experience Manager James Watt College)
- Ianthe Wassell (Student Experience Manager Matthew Boulton College)

The Designated Safeguarding Deputies are:

- Vice Principals: Anna Jackson, Jan Myatt, Ben Gamble.
- Student Experience Coordinators:
  - Sonia Crook-Lake, Lisa Underwood, Katie Dyer
- Enrichment/Welfare and Community Liaison Supervisor:
  - Taher Hussain

The Nominated Governor is Veronica Docherty

## **Recruitment and Selection**

The College aims to recruit and develop skilled and motivated staff who will deliver an outstanding service to the local community. An effective recruitment and selection process is a major contributor to this aim. The College is committed to safeguarding and promoting the welfare of children and adults at the risk of harm and expect its staff to share this commitment.

The Disclosure and Barring Service (DBS) was introduced on 1 December 2012 through the Safeguarding Vulnerable Groups Act 2006 and Protection of Freedoms Act 2012. Its purpose is to reduce the risk of harm to children and vulnerable adults.

The DBS scheme defines the type of work- regulated activity. The defined roles stated within the DBS policy, which are carried out by staff at BMet will meet the definition of regulated activity and our practices must comply with the legislation.

The barred list checks are an additional safeguarding check and part of a wider framework of safer recruitment practices. It enables the increased monitoring and review of criminal record related information and intelligence. It does not remove the need for DBS disclosures, nor does it remove the need to develop and apply robust recruitment procedures, including identity checking, qualifications and references and enquiring into career history which may include a person's conduct outside of a work setting and assessment of 'transferable risk'.

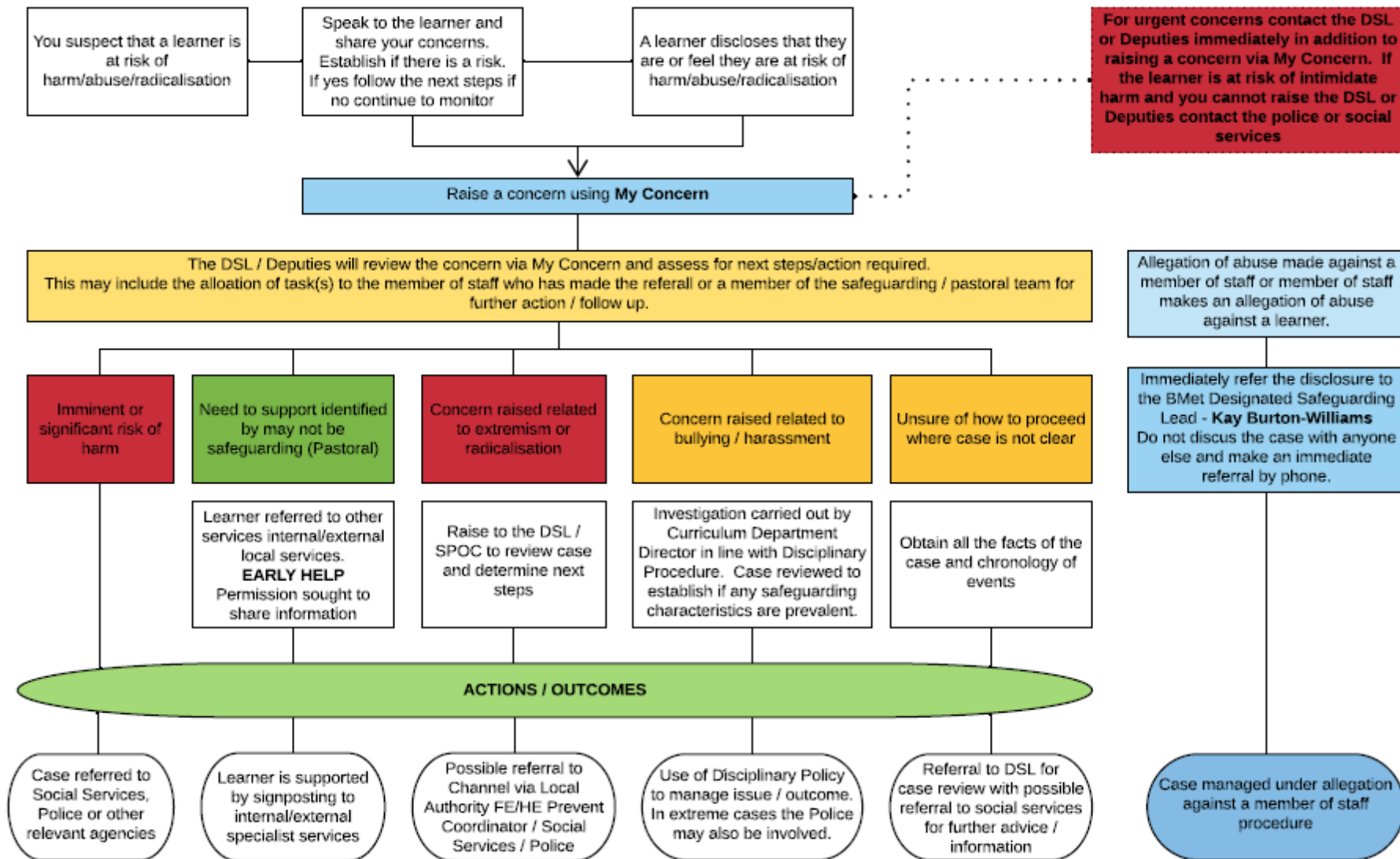
The Safeguarding Children and Safer Recruitment in Education Guidance recommends that in addition to the various staff records which are kept as part of normal business, College must also keep and maintain a single central record of recruitment and vetting checks. The College's Single Central Record (SCR) is run and stored with Human Resources.

## **Safer Recruitment Training**

All staff who participate in the recruitment process are required by the College to undergo recruitment and selection process training. In addition, every interview panel must have at least one member who has received safer Recruitment Training. Safer Recruitment training is available to all recruiting managers via Skillgate. Staff are expected to keep themselves up to date with new legislation and undertake an annual update of safer recruitment training.

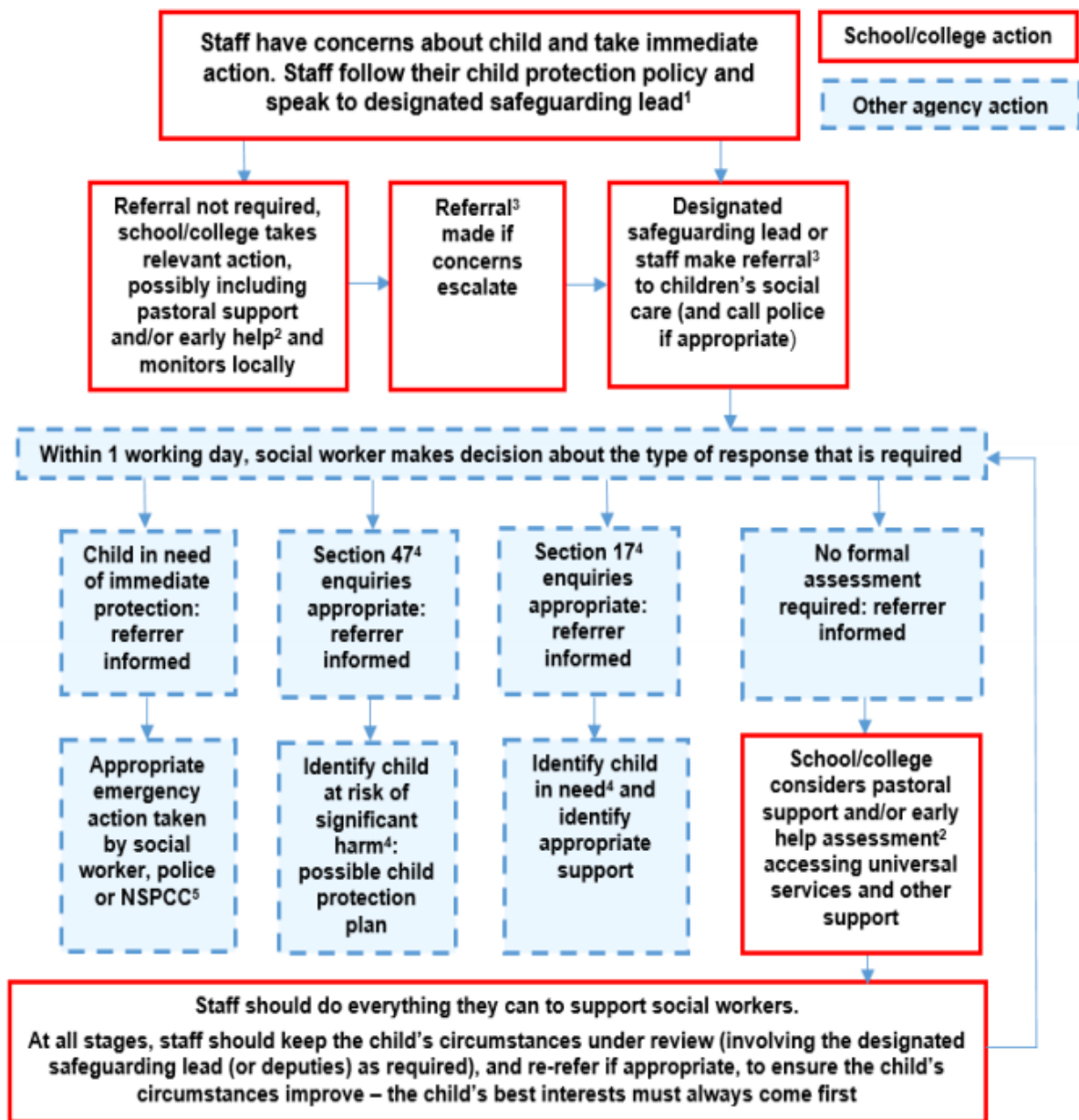
HR/Recruiting panel managers are responsible for ensuring there is minimum of one trained panel member involved at each recruitment/selection activity stage.

## Appendix 1 - Dealing with Disclosure of Abuse and Procedure for Reporting Concerns



Appendix 1a KCSIE 2020 Actions where there are concerns about a child

**Actions where there are concerns about a child**



<sup>1</sup> In cases which also involve a concern or an allegation of abuse against a staff member, see Part Four of this guidance.

<sup>2</sup> 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.

<sup>3</sup> 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](#).

<sup>4</sup> 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](#).

<sup>5</sup> This could include applying for an Emergency Protection Order (EPO).

## Appendix 2 - Safe working code of conduct

### Introduction

BMet seeks to provide a safe and supportive environment where the welfare and health and safety of students is paramount. Staff should seek to act professionally at all times, but we recognise that tensions and misunderstanding can occur in the context of interaction between staff and students. This guidance aims to help staff safeguard students and reduce the risk of conduct which could be mistakenly interpreted as improper and lead to allegations being made against individuals.

### Principles

- Staff are responsible for their own actions;
- Staff should be seen to work in a transparent way;
- Staff should act in a way that reflects the nature of their role as a person 'in a position of trust' both in their professional and personal lives;
- All staff should report any incident which may give rise to concern to a senior member of staff;
- All staff and work placements providers must be aware of and follow the College's safeguarding procedures;
- Staff who breach this code of conduct may be subject to the College's disciplinary procedures.
- Serious breach of this code may result in a referral being made to an external or statutory agency such as the local authority LADO or the Police;
- All work placements providers must report any incidents which may give rise to concern to the Work Placement Coordinator.

### Duty of Care

All staff have a duty of care to keep students safe and are accountable for the way in which they use their authority and position of trust. This duty can be best exercised through the development of caring but professional relationships. Staff should avoid situations where their motives can be questioned. If concerns or incidents arise staff are to:

- report incidents causing concern;
- record discussions and actions taken.

### Confidentiality

Staff should never share information about students in a casual manner. All concerns about child protection issues should be reported using [My Concern](#) and in serious cases also escalated to the DSL/Deputies.

### Behaviour

- Staff should adopt high standards of personal conduct at all times.
- Never share personal information;
- Do not swear or use offensive or discriminatory language;
- Do not use demeaning or racist comments (directly or indirectly);
- Never make sexual remarks to a student or discuss personal sexual relationships;
- Never make suggestive or derogatory remarks or gestures in front of young people;
- Avoid any communication which could be interpreted as sexually provocative;
- End the discussion if it becomes uncomfortable or embarrassing;
- Never make personal comments which humiliate a student or may seem to do so;
- Dress in a manner which will avoid inappropriate comments;
- Follow the Acceptable use of IT Policy and report any breaches, including social media.
- Never act in a way that can be perceived as threatening;

- Under no circumstances should staff access inappropriate images. Storing or disseminating such material is illegal and if proven will lead to the person being barred from working with young people/vulnerable adults;
- Do not transport students in your own vehicle under any circumstances;
- Do not engage/befriend with learners via social media.

### **Social Contact**

Staff should never make contact with a student outside of College for the purpose of friendship via email, telephone or social media.

- Do not accept gifts that could be construed as bribes;
- Never give out personal contact details, personal mobile phone numbers or personal email addresses;
- Never engage with students from their personal social media/email accounts;
- Report any suspected infatuation
- Report any situation which you may feel compromises your professional standing

### **Physical Contact, Intervention and Control of Students**

It is not necessary to have physical contact with students even when they are distressed, and this should be avoided at all times. Try to defuse a situation before it escalates. Never endanger your own safety.

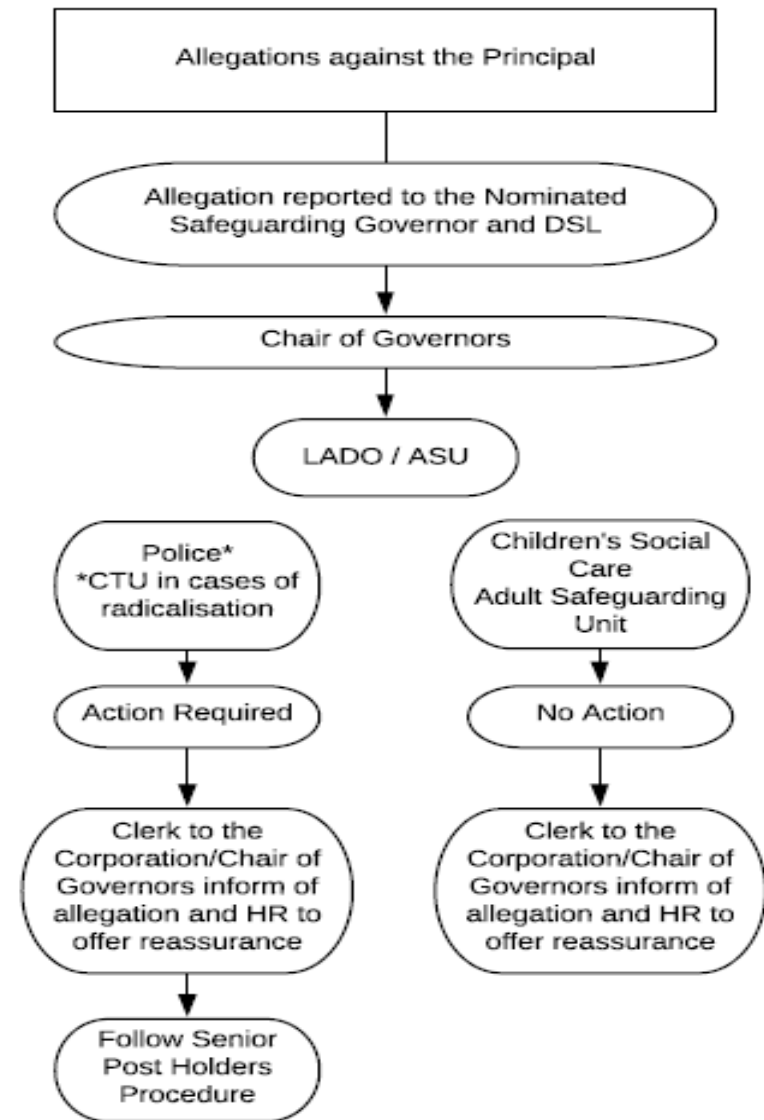
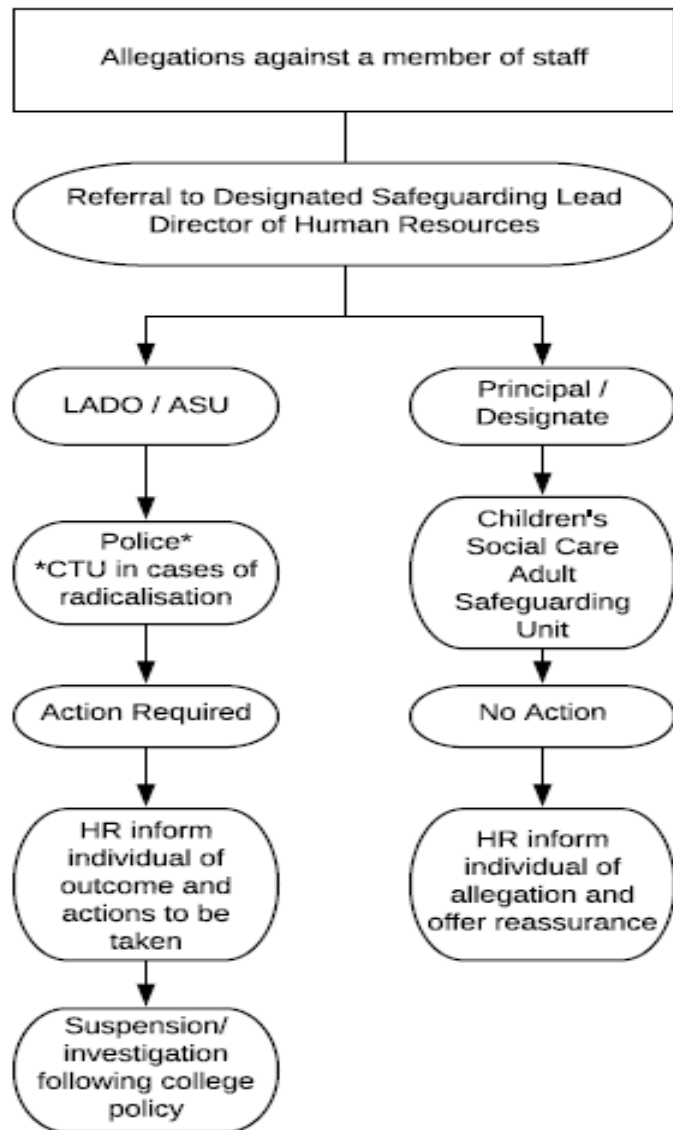
### **One to One Situations**

Staff are vulnerable to accusations when working alone with a student. If possible leave the door open or use a room with a window in the door. Never meet a student away from College unless the DSL/Vice Principal has given written permission.

### **Educational Visits and College Activities**

Staff should take extra care in less formal situations and remember they are still in a position of trust.

Appendix 3 – Allegations against a member of staff



## **Appendix 4 - External Speakers Vetting Procedure**

### **1. Policy Statement**

Birmingham Metropolitan College (BMet) is committed to creating an environment where everyone is treated with dignity and respect and where diversity is valued. This policy outlines the procedures relating to events involving the use of external speakers regardless of who is organising them.

It also details our approach to ensuring that we are protecting both staff and students and the reputation of BMet whilst following the legislation that we're responsible for upholding. This policy is written with reference to the Prevent Duty contained within Section 26 of the Counter Terrorism and Security Act 2015. The Duty states that specified authorities including Further Education Colleges, in the exercise of their functions, must have "due regard to the need to prevent people from being drawn into terrorism".

### **2. Scope**

- To provide an environment where freedom of expression and speech are protected balanced with the need to ensure that the College is not providing a platform for extremist views.
- To provide clearly defined and effective procedures to ensure that the law is upheld.
- To collaborate with others to reach sound, evidenced judgments about proposed external speakers ensuring that the College can meet their legal obligations.
- To encourage and provide a balance of opinion at any academic discussion or debate
- To provide clear instructions for organising an event with external contribution e.g. speaker, representatives, film and guidance for researching an external speaker

### **3. Freedom of speech and expression**

'Academic freedom' is a term used to describe the law that allows for open and honest debate in an academic context. The College will uphold the right to freedom of speech within the law.

### **4. External speakers and their responsibilities**

An external speaker or visitor is used to describe any individual or organisation who is not a student or staff member for BMet or one of its contracted partners and who has been invited to speak to students and/or staff This includes any individual who is a student or staff member from another institution. It also includes the main contact from any external venue hire client who is paying to use College facilities.

An event is any event, presentation, visit, activity or initiative organised by a student group/society, individual or staff member that is being held on the BMet premises or where BMet is being represented by a stand on non-College premises e.g. at an exhibition, school event or fair. It also includes events where external speakers are streamed live into an event or a pre-recorded film is shown, or activity being held on BMet premises but organised by external venue hire clients

College premises or facilities must not be used to promote:

- opinions that are contrary to fundamental British values (democracy, the rule of law, individual liberty, and mutual respect and tolerance for those with different faiths or beliefs)
- attacks upon members of the UK armed forces whether in the UK or overseas.

### **5. Guidance for BMet staff and students organising an event with an external speaker or venue hire client**

The Vice Principal and the Designated Safeguarding Lead must be informed of any events that involve external speakers through this procedure. A Director (or more senior member of staff) must complete a risk assessment of a proposed event to assure compliance with the conditions in

paragraph 4 of this procedure. No event involving any external speakers may be publicised or considered confirmed until the speaker has been cleared through the procedure detailed in this policy. This includes advertisement through any social media platform.

BMet reserves the right to cancel, prohibit or delay any event with an external speaker if the policy is not followed or if health, safety and security criteria cannot be met.

Any room booking/ event organisation with an external speaker involved must be made no later than 14 days before the date of the event. This is to allow for the organiser to have made adequate safeguarding checks as well as allowing time for alterations to the event if necessary. Any request made outside of this timeframe will be rejected unless there are extreme extenuating circumstances.

The individual/group organising an external speaker should conduct brief research into the proposed speaker. If in doubt as to the suitability of a speaker, they should refer the decision to the Designated Safeguarding Lead or Deputy Safeguarding Persons for a decision.

In making a decision the Safeguarding/Deputy Safeguarding Persons will have regard to whether any of the following apply:

- The speaker is a person or belongs to a group on/or linked to the UK Government list of proscribed terror organisations <https://www.gov.uk/government/publications/proscribed-terror-groups-or-organisations--2> ;
- The speaker is known to have previously expressed views that would be in breach of the conditions in section 4.

The Safeguarding Lead/Deputy Safeguarding Persons may approve the event/speaker unconditionally, set conditions on the event/speaker or refuse permission for the event/speaker.

## **6. External speaker request process**

The external speaker consent request should be completed and submitted via the External Speaker Request link on the Safeguarding SharePoint page. Requests must be made no later than 14 days before the planned event. Requests received for events taking place within less than 14 days may not be able to be considered. If there has been an unavoidable delay in submission and it is considered an essential event, representation to the Vice Principal must be made in writing alongside the submission. Records will be held electronically of submissions with reasons for approval / decline.

As part of the submission the following questions will be asked:

- Name of the person submitting the request;
- Course(s) group(s) who are to be invited to the event;
- Number of learners/staff who are expected to attend the event;
- Name of the speaker;
- Details of the organisation the speaker represents;
- Address, email and contact telephone number of the organisation represented;
- Confirmation if there will be any known or likely interest in the event;
- Confirmation that adequate background checks have been completed by the person submitting the request;

Details of the event itself:

- Topic the speaker will be presenting;
- Where the event will take place, college & room location
- Date of the event;
- Start & Finish time of the event.

Managers are responsible for ensuring that their staff team and students are aware of and support the policy. This policy is linked to the Safeguarding Policy available on SharePoint/[My Concern](#).



## **Appendix 5 - Death of Student in Learning Procedure**

### **Purpose**

To ensure that the most appropriate effective and compassionate discrete and confidential action is swiftly taken on the notification of the death of a current learner.

To provide a smooth, efficient speedy and sensitive flow of information to affected parties with minimum distress to all those involved and affected.

### **Scope/Responsibility**

This procedure applies to all staff and students within the college. All members of staff are responsible for ensuring the Designated Safeguarding Lead/Vice Principal or for out of hours notification the Duty Director and other appropriate staff are aware of the death within 24 hours of the College being informed of the event.

### **Procedure**

On notification of the death the Designated Safeguarding Lead/Vice Principal will notify the following staff.

- The respective Director who will then inform personal and other course tutors.
- Marketing Director who will deal with any press communications.
- Data/IT Director to arrange for personal details to be updated saying that the learner is deceased.
- Data/IT Director (Exams) who will ensure that no certificates/results are sent out unless specifically requested by the deceased learner's family.
- Finance Director who will ensure that no invoices are sent out.
- Director Student Experience to ensure they are aware should any contact be made from outside sources.

The Vice Principal will arrange for a letter of condolence to be sent to the family of the deceased.

As soon as funeral arrangements are known the Vice Principal will inform the Department Director who will inform tutors. It is expected that at least one member of the management and /or teaching team will attend the funeral of a learner.

If deemed appropriate the Vice Principal will arrange for flowers to be sent on behalf of the college.

The Designated Safeguarding Lead/Deputies will liaise with Pastoral Services/HR on appropriate bereavement counselling and support for student and/or staff.

The Curriculum Director will help identify students who were close to the deceased and are most vulnerable in the immediate aftermath as outlined below.

- Informing fellow students of their colleague's death needs to be done sensitively and quickly. This can be done either by calling a special meeting, or, more likely, at the end of a lesson. The college counsellor should ideally be present when the news is broken.
- All facts, as far as they are accurately known should be made known, as should the availability of on-going support and a person to contact for further information.
- If students are away on placement and it is impossible to inform them in person, then alternative ways of informing them should be considered. It is imperative that students are told swiftly as social media can often shape the message without any control.