

SAFEGUARDING POLICY AND PROCEDURES (Child Protection and Adults with Care and Support Needs)

1. INTRODUCTION

- 1.1 This document has been prepared in order to inform the practice of members of staff employed by the Shrewsbury Colleges Group (SCG). The policy has been based on the statutory guidance up to and including September 2019
- 1.2 The primary aim is to enable staff to meet their statutory duty to 'safeguard' the welfare of children (those under 18) who attend the campuses of SCG. However, we also recognise that some adults are vulnerable to abuse.

This policy therefore applies to those under 18 as well as adults with care and support needs (see definition below, taken from Adult Safeguarding: Multi-agency policy & procedures for the protection of adults with care & support needs in the West Midlands: 2016).

Adult(s) with care and support needs.

The adult safeguarding duties under the Care Act 2014 apply to an adult, aged 18 or over, who:

has needs for care and support (whether or not the local authority is meeting any of those needs) and;

- is experiencing, or at risk of, abuse or neglect; and**
- as a result of those care and support needs is unable to protect themselves from either the risk of, or the experience of abuse or neglect.**

Care and support needs are the mixture of practical, financial and emotional support for adults who need extra help to manage their lives and be independent – including older people, people with a disability or long-term illness, people with mental health problems, and carers.

- 1.3 This policy will be reviewed annually, be made easily available to all staff and will be placed on the college website
- 1.4 In order to assemble these procedures and guidance, reference has been made to relevant legislation, Government Statutory Guidance and local child safeguarding procedures as outlined by Shropshire Safeguarding Partnership (SSP) which are available to view at <http://westmidlands.procedures.org.uk/> as well as West Midlands local adults safeguarding procedures available to view at <http://www.keepingadultssafeinshropshire.org.uk/multi-agency-procedures>

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- 1.5 The College is committed to the provision of appropriate training and support to all staff in order to enable them to discharge their duties relating to safeguarding effectively.
- 1.6 These procedures should be read in conjunction with other safeguarding related policies in operation in the college. These include *Safer Recruitment, Staff Code of Conduct, Whistleblowing, Looked After Young People (LAYP), Prevent, Student Conduct, Search and Confiscation, CPD and Equality and Diversity.*

2. AIMS

The primary aims of the policy/procedures are to:

- Enable staff to meet their statutory responsibility to 'safeguard' the welfare of children (those under 18) and adults with care and support needs in the College.
- Promote the welfare of children, young people and adults with care and support needs.
- Provide a safe environment for children, young people and adults with care and support needs.
- Identify children, young people and adults with care and support needs who are in need or suffering/ likely to suffer significant harm and take appropriate action to make sure they are safe.
- Contribute to effective partnership working between all those involved with providing Services for Children and Young People and Adults with Care and Support Needs.

3. PRINCIPLES

The principles underpinning the work of the College with children and adults with care and support needs are set out below:

- 3.1 The welfare of the child or adult with care and support needs is of paramount consideration, and in any conflict of interest their well-being must be the focus of each action.
- 3.2 The safeguarding of children and adults with care and support needs is the responsibility of the whole college. Any member of staff who has knowledge or suspicion that a child is being harmed or is in need must inform the nominated persons with responsibility for the application of these procedures.

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- 3.3 All staff working with children and adults with care and support needs should have access to and a clear understanding of the procedures set out in this document.
- 3.4 To enable staff to meet these commitments the College will provide appropriate training. This includes training in child protection for all staff working with children in line with SSP guidance (refresher training will also be provided every three years minimum) and training in inter-agency procedures for the designated person and their deputies (with refresher training every 2 years).
- 3.5 All members of staff will receive guidance on college procedures on safeguarding during their induction and will be asked to read Part 1 and Annex A of Keeping Children Safe in Education (2019). They will also be familiarised with the staff Code of Conduct. Staff will receive regular safeguarding updates via CPD and the 'In The Loop' college newsletter with reminders of aspects of these procedures and updates on contemporary safeguarding issues.
- 3.6 All staff employed by the college will be undergo pre-employment checks as stipulated in Keeping Children Safe in Education (2019). For more detail see Safer Recruitment Policy
- 3.7 The College is committed to the maintenance of proper written records of any child protection or adult safeguarding matter dealt with under these procedures and these will be recorded on the electronic safeguarding system.
- 3.8 The College will work actively in partnership with SSP. The College will keep a record of safeguarding CPD and staff training.

Though every attempt has been made to provide a comprehensive set of procedures it is impossible to cater for every eventuality. As such any concern over the welfare or safety of children should be reported to a designated person.

Where emergency medical help is needed DO NOT DELAY – contact a first aider in college or alternatively arrange for the person to be taken to hospital.

4. STAFF RESPONSIBLE FOR SAFEGUARDING

- 4.1 Overall responsibility for child protection matters is held by Catherine Armstrong (Group Vice Principal: Curriculum Support and Business Development) who is the 'designated senior person' in terms of child and adult safeguarding matters at the Shrewsbury Colleges Group at Senior Management level.

This role entails the following responsibilities:

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- Reviewing the Safeguarding Policy annually and that procedures and implementation are reviewed regularly
- Ensuring that the Safeguarding Policy is available publically and that parents are aware of the responsibilities of the College
- Overseeing the referral of cases of suspected abuse or allegations to social care services.
- Supporting staff who make referrals to social care services
- Undertaking Prevent Awareness Training
- Referring cases to the Channel programme where there is a radicalisation concern
- Supporting staff in making referrals to the Channel programme
- Referring to the DBS when a person leaves the employment of the College or is dismissed due to risk/harm to a child.
- Referring to the police in cases where a crime may have been committed
- Providing advice and support to other staff on issues relating to child protection and the protection of adults with care and support needs
- Informing Governors of safeguarding developments and overview of policy and cases.
- Maintaining detailed, accurate, secure written records of concerns and referrals (even where that concern does not lead to a referral).
- Liaising with the local authority and SSP and other appropriate agencies in line with Working Together (2018).
- Understanding the nature of strategy meetings, core groups, case conferences and other inter-agency meetings and taking part in these meetings as appropriate.
- Liaising with secondary schools which send pupils to the college to ensure that appropriate arrangements are made for the pupils and ensuring the transfer of the child protection file of a student, with such records, who leaves college.
- Ensuring up to date knowledge by attending additional training and meetings
- Attending Designated Lead Training at least every 2 years
- Ensuring that staff receive basic training in child protection issues and are aware of the College's safeguarding policy and procedures.
- Keeping the Principal updated on child protection issues in the SSP (particularly Section 47 or police investigations).
- Understanding processes for early help and associated assessments.
- Being alert to the specific needs of children with SEN, children in need, young carers, children in care and care leavers.
- Ensuring that there are appropriate procedures and guidance to assist staff in identifying students vulnerable to radicalisation and following statutory guidance in this area (The Prevent Duty)
- Ensuring that the College has appropriate mechanisms for the identification and referral of cases of child sexual exploitation, female genital mutilation, self-harm, suicide and neglect.

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- Ensuring that safeguarding issues and education are promoted through awareness raising and sessions in the tutorial programme.
- Ensuring that the College meets the requirements of SSP with regard to auditing of child protection and safeguarding practice.
- Encouraging a culture, among all staff, of listening to children/ adults with care and support needs and taking account of their wishes and feelings in any measures the college may put in place to protect them.

4.1 The designated senior member of staff will provide an annual report to the governing body of the College setting out how the college has discharged its duties and is responsible for reporting deficiencies in procedure or policy identified by the SSP (or others) to the governing body at the earliest opportunity.

4.2 The designated senior member of staff will be supported by:

Steve McAlinden – Lead Safeguarding Officer
Dulcie Knifton – Deputy Safeguarding Officer
Sue Croxon – Deputy Safeguarding Officer

These individuals will ensure best safeguarding practice by:

- Reporting to the senior member of staff with lead responsibility.
- Making appropriate referrals.
- Being available to provide advice and support to other staff on issues relating to child protection.
- Having a particular responsibility to be available to listen to children and young people studying at the college.
- Dealing with individual cases, including attending case conferences and review meetings as appropriate.
- Having received training in child protection issues and inter-agency working, as required by the SSCB, and will receive refresher training at least every 2 years

4.3 **All concerns regarding child protection matters should be reported immediately to designated person at the appropriate Campus. Dulcie Knifton at English or Welsh Bridge Campus on (01743) 235491 ext. 309/4215 or 07970 168945. At London Road Campus contact Sue Croxon (01743 342345/ 07792 147376). If it is not possible to contact the appropriate lead person above then call Steve McAlinden on 07970 168953. These Designated Safeguarding Leads will be responsible for determining such action as is necessary under the Safeguarding procedures contained within this document. The wider Safeguarding Team details are on posters displayed around each Campus.**

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- 4.4 There is also a designated member of the board of governors with responsibility for child protection and safeguarding issues. The designated member of the governing body with responsibility for child protection issues is Christina Gore.

The designated governor is responsible for liaising with the Principal and designated senior person over matters regarding child protection, including:

- Ensuring that the College has procedures and policies which are consistent with the Local Safeguarding Partnership's procedures.
- Ensuring that the governing body considers the College policy on child protection and protection of adults with care and support needs 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.

- 4.5 The Chair of Governors is responsible for overseeing the liaison between relevant agencies and the Local Authority in connection with allegations against the Principal/ CEO of the College. This will not involve undertaking any form of investigation, but will ensure good communication between the parties and provide information to assist enquiries.

To assist in these duties, the Chair of Governors will receive appropriate training.

- 4.6 The College Vice Principal Curriculum Support and Business Development must make contact with the designated officer at the Local Authority if there is an allegation of abuse against a member of staff.

5. DEFINITIONS AND RECOGNITION OF CHILD ABUSE

- 5.1 It is commonly accepted that teachers and other staff in education spend so much time in contact with young people and adults with care and support needs that they are in a unique position to discern whether a student is a victim of abuse or not. However, it is important to know what this abuse is and how it can be picked up on.
- 5.2 The four principle categories of harm suffered by children are set out in Working Together to Safeguard Children 2018 and Keeping Children Safe in Education 2019. These are used to assist those responsible for the welfare and protection of children to understand and recognise the symptoms of abuse.
- 5.3 The diagnosis of abuse is difficult, even for experts. It is NOT the role of college staff to define or attempt to diagnose whether a child has suffered abuse within certain categories. An understanding of the categories is, however, important to enable staff to recognise symptoms of abuse.

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- **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.
- **Sexual abuse:** involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.
- **Neglect:** the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.
- **Emotional abuse:** the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

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5.4 Other Specific Safeguarding Issues**Peer on Peer Abuse**

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

- **bullying**, including cyberbullying, (follow the Anti-Bullying policy in these cases)
- **physical abuse** such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (in most cases the Student Conduct Policy will be followed in first instance where victim and perpetrator are both college students – this should not preclude use of safeguarding procedures as deemed appropriate)
- **sexual violence and sexual harassment** including the criminal act of ‘Upskirting’ (see Appendix F for procedure)
- sexting - also known as **youth produced sexual imagery** (see Appendix E for procedure)
- initiation/ hazing type violence and rituals

All instances of sexual violence or harassment and youth produced sexual imagery must be reported to a designated safeguarding lead. This should also be the case where it is felt that there is a danger of significant harm in cases of bullying, physical abuse and initiation/ hazing.

Female Genital Mutilation

Female Genital Mutilation (FGM) comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long lasting consequences. More detail on this form of abuse can be found in the [FGM Fact Sheet](#). There is a specific statutory reporting duty regarding FGM. Instructions for the reporting of FGM are found in section 6 of this guidance.

Youth Violence and Gang Involvement

The College has a responsibility to contribute to multi agency work to prevent youth violence and gang involvement. The College will work with the local Youth Offending Service and the Community Safety Partnership to understand the local situation and risks. This will inform the work undertaken to educate and support students to reduce the risks, through measures such as Tutorial sessions on conflict resolution, the laws around knife crime and ‘joint enterprise’. The search and confiscation policy will be used as appropriate where intelligence informs us that students may be in possession of items that may be linked to youth violence and gang involvement. Appropriate support and interventions will be put in place where a risk of involvement

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in gangs or youth violence is identified. Support on this issue is available via the NSPCC on 0808 800 5000. Guidance on this important issue is available from the Home Office in Preventing youth violence and gang involvement - Practical advice for schools and colleges.

Child Sexual Exploitation

Child Sexual Exploitation (CSE) is a form of sexual abuse where children are sexually exploited for money, power or status. It can involve violent, humiliating and degrading sexual assaults. In some cases, young people are persuaded or forced into exchanging sexual activity for money, drugs, gifts, affection or status. **Consent cannot be given** even where a child may believe that they are voluntarily engaging in sexual activity with the person who is exploiting them.

Preventing Radicalisation

Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism. The SCG has a specific policy surrounding this area of safeguarding and this should be referred to for guidance.

Forced Marriage

Forcing a person into a marriage is a crime in England or Wales. A forced marriage is one entered into without the full and free consent of one of the 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 free and full consent can be where a person does not consent (if they have learning difficulties, for example).

Children Missing From Education

A child going missing from education is a potential indicator of abuse or neglect. Staff should inform the designated safeguarding lead if they are concerned that patterns of absence may indicate issues such as child sexual exploitation, FGM or neglect.

When 14-16 year old students are enrolled with the college they must work collaboratively with the Local Authority in order to share information about attendance and absences as deemed appropriate. The College should also inform the Local Authority immediately if that child aged 14-16 is removed from roll so that they can fulfil their duty of identifying students of compulsory age that are missing education.

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Domestic Violence

The cross-government definition of domestic violence and abuse is:

any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality.

The abuse can encompass, but is not limited to:

- psychological
- physical
- sexual
- financial
- emotional

If a disclosure is made that a student or vulnerable adult is a perpetrator or victim of relationship abuse – or if a child is witnessing this type of abuse at home – this must be reported to a designated safeguarding lead.

E-Safety

There is a specific policy outlining the approach of the College to E-Safety as well as the responsibilities of the individuals and groups that make up the college community. The College approach to **sexting (youth produced sexual imagery)** and guidance for staff can be found in Appendix E.

Expert and professional organisations are best placed to provide up-to-date guidance and practical support on specific safeguarding issues. For example information for schools and colleges can be found on the TES website and the NSPCC website regarding the issues listed below. Schools and colleges can also access broad government guidance on the issues listed below via the GOV.UK website on:

- radicalisation
- child missing from home or care
- bullying including cyberbullying
- drugs
- fabricated or induced illness
- faith abuse
- forced marriage
- gangs and youth violence
- gender-based violence/violence against women and girls (VAWG)
- mental health
- private fostering

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- teenage relationship abuse
- trafficking
- honour based violence
- breast ironing

Staff can follow the links in Part 1 of Keeping Children Safe in Education (2019) to gain further information on the issues mentioned above.

Also, but not exclusively, adults with care and support needs could be subject to additional forms of abuse. These include:-

Financial abuse/ material abuse –

Includes theft, fraud, exploitation, pressure in connection with Wills or property, or the misappropriation of property or benefits. It also includes the withholding of money or the unauthorised or improper use of a person's money or property, usually to the disadvantage of the person to whom it belongs. Staff borrowing money or objects from a service user would also be considered abuse.

Discriminatory abuse –

Includes racist, sexist, homophobic, ageist comments or jokes or comments and jokes based on a person's disability or any other form of harassment, any of the above forms of abuse with discrimination as a motive, not responding to the dietary needs or not providing appropriate spiritual support. Excluding a person from activities on the basis that they are 'not liked' is also discriminatory abuse.

6. GUIDANCE FOR STAFF

If you are concerned that a child or vulnerable adult within the College has suffered maltreatment you should follow these guidelines. It doesn't matter how insignificant the concerns may seem.

A general principle of 'it could happen here' should be followed.

The College will provide a whole organisation approach and will:

- Encourage students to develop their own self-awareness, consider boundaries and seek to develop their own emotions and behaviours
- Provide leadership management:
 - Ensuring policies and procedures are fit for purpose and followed through regular staff training and updates
 - Ensuring staff know their responsibilities through the whole organisation approach
 - Promoting a culture of vigilance.
- Work with external agencies to develop strong links in readiness for referrals.

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- Work with employers to ensure they have a clear understanding of their safeguarding responsibilities, know who to contact if concerned and that the employer practice replicates college practice.
- Endeavour to develop the individual's resilience in order to respond to future challenges and be able to cope with health and mental situations.
- Achieve organisational resilience through training, procedure review and reporting.

Together the organisation and students can contribute to the overall social resilience of the community.

The vigilance is based all staff being responsible for the 5 R's:

- Recognise
- Respond
- Record
- Report
- Refer

Although child refers legally to people under 18, follow these steps with any student and we will decide who to refer the matter to later.

6.1 What to do if you suspect, or are told, that a child or adult with care and support needs is being abused.

- You should **NOT** investigate the concerns - this is the job of the relevant authorities.
- Do **NOT** ask questions (which may prejudice any subsequent enquiry) or examine the child for any sign of injury.
- **LISTEN CAREFULLY** to what you are being told and don't pass any kind of judgement on any of the information that you are being given.
- Carefully record **IN WRITING** what the child has told you, or what has been observed, as soon as possible. Sign and date this disclosure and pass on to Dulcie Knifton at English or Welsh Bridge Campus on (01743) 235491 ext. 309/4215 or 07970 168945, Sue Croxon at London Road Campus on 01743 342345 or 07792 147376. In their absence contact Steve McAlinden on 07970 168953. **You have the option to use the Safeguarding Report Form found in Appendix C to record the disclosure – this is not compulsory**
- **DO NOT PROMISE CONFIDENTIALITY AS THIS CANNOT BE DELIVERED.**
- Do **NOT** contact the child/ adult's parents or carers.
- **IMMEDIATELY CONSULT** – Dulcie Knifton at English or Welsh Bridge Campus or Sue Croxon at London Road Campus
- If there is any need for emergency medical treatment **DO NOT DELAY** - contact a First Aider.

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- If you cannot access a designated person do not delay. Any member of staff can make a referral to Children's Social Care (as outlined in Appendix A)

This procedure also applies if the allegations of abuse are being made against other children.

Female Genital Mutilation (FGM)

The Serious Crime Act (2015) places a statutory duty on **teachers** to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18.

If a disclosure of FGM is made (or evidence seen, though this is unlikely as teachers should not look or investigate) and the girl is under 18 at the time of the disclosure –

- The disclosure should be recorded in the usual way
- The disclosures should be shared as soon as possible with the designated safeguarding lead
- The designated safeguarding lead will support the teacher in reporting the disclosure to the police – usually via 101 (**This reporting is the teacher's statutory duty and they will face disciplinary sanctions if it is found that a report to the police is not made following a disclosure**)

A report should be made to the designated safeguarding lead in the event that a safeguarding concern involving FGM comes to light where –

- Risk of FGM is identified, but it has not yet been carried out
- The disclosure does not come directly from the alleged victim
- The victim is no longer under 18 (even if they were when the FGM took place)
- The disclosure is made to a member of staff who is not a teacher

In these cases the designated safeguarding lead will follow local safeguarding procedures and the staff member will not have to contact the police.

6.2 Reporting and dealing with allegations of abuse against members of staff

The procedures apply to all staff, whether teaching, administrative, management or support, as well as to volunteers. The word 'staff' is used for ease of description

- You should **NOT** investigate the concerns.
- Do **NOT** ask questions (which may prejudice any subsequent enquiry) or examine the child for any sign of injury.

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- **LISTEN CAREFULLY** to what you are being told and don't pass any kind of judgement on any of the information that you are being given.
- Carefully record **IN WRITING** what the child has told you, or what has been observed, as soon as possible. Sign and date this disclosure and pass on to Dulcie Knifton at English or Welsh Bridge Campus or Sue Croxon at London Road Campus Sign and date this information. **You have the option to use the Safeguarding Report Form found in Appendix C to record the disclosure – this is not compulsory**
- **DO NOT PROMISE CONFIDENTIALITY AS THIS CANNOT BE DELIVERED.**
- Do **NOT** contact the child's parents or carers.
- **IMMEDIATELY CONSULT** Dulcie Knifton at English or Welsh Bridge Campus or Sue Croxon at London Road Campus.
- If there is any need for emergency medical treatment **DO NOT DELAY**, contact a First Aider.
- If the allegation is made against the designated person, the Principal must be **CONTACTED IMMEDIATELY.**
- If you cannot access a designated person do not delay. Any member of staff can make a referral (as outlined in Appendix A).

In cases of allegations of abuse being made against a member of staff, the Staff Disciplinary Procedure will be invoked.

The Curriculum Support Director will work with the College Vice Principal (Curriculum Support and Business Development) to follow the Shropshire Safeguarding Partnership Guidelines linked below. It is likely that, as part of this process, the Local Authority Designated Officer will be contacted.

<http://westmidlands.procedures.org.uk/ykpzy/statutory-child-protection-procedures/allegations-against-staff-or-volunteers>

Safer recruitment is covered within the SCG's Safer Recruitment Policy

6.3 What staff should do if they have concerns about safeguarding practices in the College

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

- Staff can raise concerns via the Whistleblowing Policy
- Where a staff member feels unable to raise an issue with the College or feels that their genuine concerns are not being addressed, other whistleblowing channels may be open to them:

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- General guidance can be found at <https://www.gov.uk/whistleblowing>
- The NSPCC what you can do to report abuse dedicated helpline is available for staff who do not feel able to raise concerns regarding child protection failures internally. Staff can call: 0800 028 0285 – line is available from 8:00 AM to 8:00 PM, Monday to Friday and Email: help@nspcc.org.uk.

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APPENDIX A

GUIDANCE FOR THE DESIGNATED PERSON IN CHARGE OF SAFEGUARDING WHO RECEIVES A DISCLOSURE

You must refer – You must NOT investigate – Do NOT delay

1. The aim of the designated person should be to establish as quickly as possible the nature of the injury or alleged abuse to facilitate an effective referral to Social Services without undue delay on 0345 678 9021
2. The designated person should have as much accurate information as possible available and have thought through the concerns to be expressed including:
 - Names and dates of birth of the child/ vulnerable adult and family members, including all other children.
 - Ethnicity
 - Home address
 - Names of those who hold parental responsibility
 - Whether the child and parents/carers are aware of the referral
 - Whether the concern is something that has been observed by the referrer or another member of staff or a third party.
 - Whether the concern is related to the child's behaviour, an injury or something that the child or vulnerable adult has said.
 - Whether the child or vulnerable adult has told anyone else.
 - Whether the concern has developed gradually or just today
 - What evidence there is for the concern
 - What is the **context** of the concern? Regard should be given to contextual safeguarding (ie) whether wider threats or factors may be having an impact on welfare. For example, the local community, potential gang links, online influences.
 - Who you think is responsible for the harm or potential harm to the child or vulnerable adult.
 - Whether you think that the child needs immediate protection.

Lack of availability of this information is not a reason to delay the referral to Social Services

3. The designated person should establish clarity with Social Services regarding the next course of action to be taken and by whom, and fully record the discussion and actions agreed.

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4. The designated person should take no action without the agreement of Social Services
5. Where emergency medical help is required DO NOT DELAY – contact a First Aider.
6. The designated person will ensure that updates are forthcoming from the authorities with regard to progress against reported cases, within the relevant timescales and follow up the concern/ escalate if the promised information or decision does not arrive in the timescale promised.
7. If, after a referral, the child's situation does not appear to be improving, the referrer should consider following the escalation procedures outlined in Appendix D to ensure that concerns have been addressed and that the child's situation improves.

AGENCIES IN SHROPSHIRE RESPONSIBLE FOR CHILD PROTECTION

1. If you have concerns about the safety or welfare of a child or want to make a referral, call 0345 678 9021.

Through this number you can be triaged by Shropshire Council's Customer Service Centre to the Initial Contact Team if a referral is appropriate or to another service.

2. You can also report concerns over the safety of a child at <http://www.nspcc.org.uk/what-you-can-do/report-abuse/>.
3. If you want to enquire about services for a child or young person call the Family Information Service on 01743 254400.
4. You can also speak to the 2 agencies below for advice:
 - NSPCC: 0808 800 5000 (or e-mail help@nspcc.org.uk)
 - Childline: 0800 1111
5. After 6pm or at the weekends please phone the Emergency Duty Team: 0345 678 9040

West Mercia Constabulary: Public Protection Unit

Police Station
Clive Road
Monkmoor
Shrewsbury
SY2 5RU

Telephone: 0300 333 3000

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West Mercia Constabulary undertakes the investigation of crime, and as such does not have the lead role in the investigation of child protection matters.

It would NOT normally be necessary for any referral to be made to the police in the first instance. However, as with emergency health issues, **where emergency police assistance is required, DO NOT DELAY.**

In the event of an allegation being made against a member of staff contact the Designated Officer on 03456 789021

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APPENDIX B**LEGAL CONTEXT OF SAFEGUARDING CHILDREN AND CHILD PROTECTION AGENCIES' CONTACT DETAILS**

The protection of children from harm is set out under the stipulations of Government legislation. In terms of the college the main legal responsibilities are outlined in The Children Act 1989. Here it is stated that the Local Authority has the lead responsibility to safeguard children and investigate concerns. Under Section 47 of the same act colleges are legally obliged to provide assistance to the Local Authority in the investigation of child abuse. As such we need agreed procedures to enable us to 'work together' with other statutory agencies in the task of safeguarding children. However, there is also other legislation that impinges on our duty to safeguard children. Examples of this include Section 175 of the 2002 Education Act which states that 'Governing bodies of FE colleges have a statutory duty to have arrangements for ensuring that their functions are carried out with a view to safeguarding and promoting the welfare of children'. Also, the Protection of Children Act (1999) seeks to check that those working with children do not have criminal convictions of relevance to the safety and well-being of children. Finally the Children Act (2004) created the legal basis of the Safeguarding Children Board.

The procedures that follow are designed to meet the criteria necessary to fulfil our obligations in the light of the above, and other, legislation.

NATIONAL AND LOCAL GUIDANCE

A full range of guidance is provided which enables agencies at local level to understand and apply the Children Act (1989 and 2004).

These include, most importantly:

1. **Keeping Children Safe in Education (2019)**. Statutory guidance on what colleges should do and the legal duties with which colleges must comply. This includes information on recruitment of staff. **All staff must read at least part one of this document.**
2. **Working Together to Safeguard Children (2018)**. This statutory guidance outlines how all professionals must act on how to safeguard children (in particular inter-agency working).
3. **What to Do If You Are Worried That A Child Is Being Abused (2015)**. This document gives advice on how practitioners can work in partnership to look after the welfare of children.

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4. Safeguarding Children Procedures

At the local level, the Shropshire Safeguarding Partnership work in consortium with their local equivalents to adopt a set of procedures for the West Midlands. These can be found, alongside Shropshire specific guidance at <http://westmidlands.procedures.org.uk/>

POLICY AND PROCEDURE

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**APPENDIX C
Safeguarding Report Form**

Staff Details

Date	
Time of Interview	
Curriculum Area	
Contact Number (Work)	
Contact Number (Home)	

Student Details

Full Name			
Student ID		Date of Birth / Age	

Child	Yes/No	Adult at risk of harm	Yes/No
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Family Address	
Telephone Number	
Student's Contact Number (Home)	
Student's Contact Number (Mobile)	
Current Address	
Names of Household Members (If Applicable)	

POLICY AND PROCEDURE

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Information Relating to the Incident

What did the student tell you?

Is the student aware that this referral is being made?	
--	--

Student's feelings regarding what they would like to happen as a result of the disclosure (if appropriate)

Staff Signature	
-----------------	--

To be completed by a member of the Safeguarding Team

Name	
Date / Time referred to you	
Organisation referred to	
Name of person who took the referral	
Date / Time referred to external services	

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APPENDIX D

ESCALATION OF CONCERNS

This guidance is designed to support a Designated Safeguarding Lead where there are professional disputes or issues surrounding a specific case and to give a framework to follow. This section is written using guidance from the Shropshire specific section of the West Midlands Procedures <http://westmidlands.procedures.org.uk/local-content/4gjN/escalation-policy-resolution-of-professional-disagreements>

When practitioners are working together in the complex business of safeguarding children there will inevitably be occasions when there are professional differences of opinion or concerns about practice decisions, actions or lack of actions to a referral, assessment or the progress of child's plan. In these circumstances practitioners have a duty to take action to address professional disagreements as soon as they arise in a way that is appropriate and proportionate. If sufficiently serious, and when disagreements are not able to be resolved easily and quickly, it is important that they are escalated formally and recorded.

Examples of case-specific professional disagreements include:

- When there is disagreement about the response to a referral made by one agency to another agency or service (e.g. decision making).
- When there is disagreement about the outcome of an assessment.
- When there is serious concern about the implementation of a Child's Plan and disagreement about how this should be addressed (e.g. agreed actions not being followed through).
- When there is serious concern about the effectiveness of a child's Plan in bringing about the necessary changes and disagreement about how this should be addressed (e.g. drift/delay).
- When there is disagreement over the sharing of information in a particular case.

It is important that practitioners and managers understand what action they need to take in order to address professional differences of opinion and the systems in place in their organisation to support this action.

Stage-by-stage process for resolution and escalation

Stage 1

The Designated Safeguarding Lead in question should raise matters with their fellow professionals, either verbally or in writing, within 1 working day of any disagreement or concern, with clear evidence and information. It should be made clear that the matter is being raised as part of these escalation procedures. Professionals may also discuss the

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matter with their line manager/ relevant persons. Every effort should be made to resolve any disagreements as quickly as possible, “in real time”. The professionals involved should keep a record, on the child’s file within their agency of any verbal or written communications, clearly signed and dated.

Stage 2

If the Designated Lead is unable to resolve the matter, then this should be escalated to line managers, who should ascertain the specific circumstances of the disagreement and make contact with each other within 1 working day of being advised of the issues (each agency is responsible for identifying who the appropriate manager/ person is in their organisation at each stage in this process). If the matter is resolved at this stage the responsible manager will advise the appropriate person in another agency within 1 working day, and confirm by letter/ email. All correspondence and discussions should be recorded/ placed on the child’s/ families file, signed and dated.

Stage 3

If the process prior to this point does not achieve agreement between agencies, then the line managers should immediately refer the matter to their relevant senior manager. In the case of Shrewsbury Colleges Group this will be the College Vice Principal: Curriculum Support and Business Development (this will be Service Manager, DCI level equivalent for other agencies). At this point a Formal Escalation Form should be completed by the line manager raising the issue with their senior manager, outlining the issues/ action taken. This will prompt a review of the case and the issues of disagreement/ concern. Contact should be made between senior managers across the agencies within 1 working day, and if necessary a meeting, within 2 working days, to seek to resolve the issues. Any outcomes and decisions should be communicated to all relevant personnel in each agency, in writing. All written and verbal communications should be recorded on the child’s file. The Formal Escalation form can be found here

<http://westmidlands.procedures.org.uk/assets/clients/6/Shropshire%20Downloads/Formal%20Escalation%20Form.docx>

Stage 4

Where a resolution is still not achieved the matter should be referred to assistant director level or equivalent within the organisations (in the case of Shrewsbury Colleges Group this will be the Principal), who will plan to meet within 5 working days of notification of the unresolved issue. If it has not already occurred, this stage may include a review of the agencies files and records relating to the child and family. The respective agency member for Shropshire Safeguarding Children Partnership should also be advised, If not already aware, at this stage. The Formal Escalation Form should be completed and all written and verbal communications recorded on the child’s/ families file.

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Stage 5

If it has not been possible to resolve the professional differences at stage 4 the matter should be brought to the attention of the Director of Services for the relevant agencies (if not already done so) and also referred through the agencies SSP link member (in the case of Shrewsbury Colleges Group this is the Curriculum Support Director) to the Shropshire Safeguarding Partnership. A further Formal escalation form should be completed and forwarded to the SSP business manager. As a matter of urgency the agencies senior managers, Independent Chair of SSP and SSP business manager should meet to review all information and actions to date, and reach a final decision.

The expectation is that, managed openly and effectively, the vast majority of any disagreements or concerns between professionals will be resolved at the earliest stages. Should any disagreements or issues reach stage 4 of this process the matter should be referred to the SSP in order that the board can be assured that any concerns may be isolated and not systemic in nature that might require further consideration and learning.

Should any dispute or disagreement remain unresolved after all the above processes the matter should be referred for an independent review.

A flow diagram summarising the process above can be accessed here

<http://westmidlands.procedures.org.uk/assets/clients/6/Shropshire%20Downloads/Resolution%20and%20escalation%20flowchart.pdf>

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APPENDIX E

YOUTH PRODUCED SEXUAL IMAGERY (SEXTING)

This guidance is based on the document Sexting in schools and colleges: Responding to incidents and safeguarding young people produced by UKCCIS (2016) and the College of Policing briefing note entitled Police action in response to youth produced sexual imagery ('sexting') November 2016.

This guidance covers incidents where :

- A person under the age of 18 creates and shares sexual imagery of themselves with a peer under the age of 18
- A person under the age of 18 shares sexual imagery created by another person under the age of 18 with a peer under the age of 18 or an adult
- A person under the age of 18 is in possession of sexual imagery created by another person under the age of 18

It does not cover the sharing of sexual imagery of people under 18 by adults (this is sexual abuse and so covered in an earlier section) or the sharing by people under 18 of pornography or exchanging sexual texts with no imagery.

The Law

It is illegal to make, possess or distribute 'indecent' images of an under 18 year old (child) and this includes imagery of yourself if you are under 18.

The UKCCIS guidance (2016) states that 'indecent' for most purposes means imagery that contains 'a naked young person, a topless girl, and/ or displays genitals or sex acts, including masturbation.....indecent images may also include overtly sexual images of young people in their underwear'.

The above means that **young people who share sexual imagery of themselves, or peers, are breaking the law.**

The police, though, are keen not to unnecessarily criminalise young people due to the stigma and impact of this on them. The **police response** takes this factor into account.

The Police Response

Such incidents are to be treated primarily as matters relating to safeguarding rather than crimes.

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When the police are notified of an incident of youth produced sexual imagery they are obliged to record it on their crime systems. The incident is listed as a crime and the young person involved as a suspect. This is not the same as having a criminal record. If it is decided that proceeding further with an investigation is not 'in the public interest' an Outcome 21 will be recorded (the young person broke the law, there is evidence to support this but further investigation is not in the public interest)

Handling incidents in college

This type of incident should be treated by staff in the same way as any other safeguarding incident listed in the main body of these procedures.

This means that in incidents of youth produced sexual imagery:

- A referral must be made to a designate safeguarding lead as soon as possible
- The designated lead should meet with appropriate staff to review the case as soon as possible
- If appropriate there should be an interview with the young people involved
- Parents should be involved at an early stage (unless this is not appropriate under the safeguarding procedures – eg it puts the young person at others at heightened risk)
- If there is a concern of harm or danger of harm to the young person/ people involved a Child Protection referral should be made

Guidance for Designated Safeguarding Leads in college

1) Initial Review Meeting

This meeting should consider the evidence and establish

- Whether a young person is at immediate risk of harm/ whether a child protection referral needs to be made immediately
- Whether it is necessary to view the imagery to safeguard the young person involved
- Any further information that is needed
- How widely the image has been shared
- Whether images need to be immediately deleted from devices or online
- Any relevant background on the young people involved
- Whether to contact parents at this stage

2) Early referral to police and/ or child protection services

The incident MUST be immediately referred if :

- The incident involves an adult

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- There is concern around grooming or coercion (or it is felt that, due to issues such as an additional need, the young person does not have the capacity to consent)
- The imagery contains elements of violence or unusual sexual activity for their developmental stage (the Brook Traffic Light Tool can be referred to here)
- The imagery involves a young person under 13
- The young person is at immediate risk of harm (eg, suicidal or self harming) as a consequence of the imagery being shared

3) Dealing with incidents in college (not making an immediate police/ child protection referral)

If none of the criteria in section 2 apply then it is possible to respond to the incident internally (though it may still be escalated at any time)

This decision should be made if a designated safeguarding lead is confident that the incident can be assessed and managed, in terms of risk, within the college and using existing internal frameworks and support.

The incident should be recorded on the college safeguarding system after consultation with the College Vice-Principal (Curriculum Support and Business Development)

If the decision is made to respond to the incident internally a further review should take place to establish the facts and assess the risks.

The following should be considered:

- Why was the image shared (was there any coercion or pressure to share?)
- Who shared the imagery, where and did the subject have awareness of the sharing?
- Were any adults involved in sharing?
- What impact is it having on the subject?
- Is there any history of this kind of activity?

Informing parents

Parents/ carers should be informed at an early stage unless informing the parent increases risk (if this is the case it is likely that we would involve other agencies)

We may work with the young person for them to inform their parent/ carer

Reporting incidents to police

If this becomes necessary report by dialling 101 or contacting a PCSO or safer schools police team member with an awareness of the college. Record any crime reference number given.

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Securing and handing over devices to the police

If a device needs to be seized and passed to the police as it contains shared imagery it should be confiscated and kept under lock and key until the police are able to collect it.

Viewing imagery

Staff should **not** view youth produced sexual imagery unless there is a clear reason to do so.

The images should not be viewed if it will cause significant distress or harm to the young person.

If the decision is made to view the imagery, the member of the safeguarding team would need to be satisfied that viewing:

- Is the only way to make a decision about whether to involve other agencies
- Is necessary in order to report the image in order to have it taken down or to support the young person in making a report
- Is unavoidable as the image has been presented directly by a student or has been found on a college network or device.

If it has been necessary to view an image the member of the safeguarding team should:

- Never copy, print or share the image (This is illegal)
- Discuss the decision with the College Vice-Principal Curriculum Support and Business Development
- Ensure viewing takes place by a member of the safeguarding team under the delegated authority of the College Vice-Principal Curriculum Support and Business Development
- Ensure that the viewing takes place with another member of staff (preferably a member of the Senior Leadership Team) in the room
- Ensure that the viewing takes place on the college premises (where possible in the office of a member of the Senior Leadership Team)
- Ensure that the images are viewed by a staff member of the same gender as the subject (where possible)
- **Record the viewing in the chronology of the subject on the college safeguarding system** (recording who was present, why the image was viewed and any subsequent actions)

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Deletion of images

If the college has decided that other agencies do not need to be involved we should consider deleting the image from devices and/or online services to prevent any further sharing

The college has the right under the Education Act 2011 to search students for devices, search the devices and to delete any youth produced sexual imagery **if the member of staff is authorised by the Principal (parental consent is not required)**.

If concerning data is found during a search a member of the safeguarding team may decide to delete the image or retain the device to report to the police or to be used in a College Conduct case.

This searching of devices (and possible deleting of imagery) should only be done if there is a good reason to do so.

In most cases it is sufficient to ask the young person to delete the imagery and to confirm that they have done so.

Students should be reminded of the illegality of the act of possessing youth produced sexual imagery. They should be told that if they refuse to, or it is later found that they did not, delete the image the police may be informed.

All decisions and actions need to be fully recorded (times, dates and reasons for decisions) on the college safeguarding system under the record of the student(s) involved.

Interviewing the young person/ people involved

Once established that a young person involved in youth produced sexual imagery is not at risk they should be interviewed in college. Ideally this should be carried out by a member of the safeguarding team, though we should try and facilitate an interview with a different member of staff if this is the preference of the young person.

This conversation is designed to find out what the image involves (and if anyone else is involved) and to find out who has seen the image and how further distribution can be prevented.

Recording incidents

All incidents must be recorded on the college safeguarding system. They should show the details of the disclosure, how the situation has been managed, evidence of sound decision making and referrals (where appropriate) and the next steps (including any inter-agency working) that have brought the incident to a satisfactory conclusion.

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Where an incident is not reported to the police or child protection agencies the reason for this should be part of the record and the permission of the College Vice-Principal Curriculum Support and Business Development recorded.

Educating students on the topic of youth produced sexual imagery

The college Tutorial programme covers specific learning on youth produced sexual imagery to include:

- What it is
- How it is most likely to be encountered
- The consequences of requesting, forwarding or providing such images (including consensually)
- Matters of the law
- The risk of damage to feelings and reputation
- Strategies to manage pressure to share such images
- Strategies to manage the receipt of such images

The college will also provide relevant signposting to other sources of information and advice.

Awareness will be raised through information provided on Moodle and through one off events such as Safer Internet Day

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APPENDIX F

SEXUAL HARASSMENT AND SEXUAL VIOLENCE

This appendix refers to the detailed advice issued to schools and colleges in May 2018 to help manage reports of child on child sexual violence and harassment. The guidance is available online via the link below

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

This area relates to incidents when the alleged victim and perpetrator are under 18 (if the perpetrator is over 18 the incident represents sexual abuse rather than a child on child incident). The perpetrator may be an individual or a group of children.

The aim here is to offer general guidelines to staff on an approach to these issues. Designated Safeguarding Leads will follow more detailed guidance when investigating incidents.

Staff should be aware of the importance of:

- making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up;
- not tolerating or dismissing sexual violence or sexual harassment as “banter”, “part of growing up”, “just having a laugh” or “boys being boys”; and
- challenging behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them.

What is Sexual violence and sexual harassment?

Sexual violence

It is important that school and college staff are aware of sexual violence and the fact children can, and sometimes do, abuse their peers in this way. When referring to sexual violence we are referring to sexual offences under the Sexual Offences Act 2003 105 as described below:

Rape: A person (A) commits an offence of rape if: he intentionally penetrates the vagina, anus or mouth of another person (B) with his penis, B does not consent to the penetration and A does not reasonably believe that B consents.

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Assault by Penetration: A person (A) commits an offence if: s/he intentionally penetrates the vagina or anus of another person (B) with a part of her/his body or anything else, the penetration is sexual, B does not consent to the penetration and A does not reasonably believe that B consents.

Sexual Assault: A person (A) commits an offence of sexual assault if: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents

What is consent?

Consent is about having the freedom and capacity to choose.

Consent to sexual activity may be given to one sort of sexual activity but not another, eg to vaginal but not anal sex or penetration with conditions, such as wearing a condom.

Consent can be withdrawn at any time during sexual activity and each time activity occurs. Someone consents to vaginal, anal or oral penetration only if s/he agrees by choice to that penetration and has the freedom and capacity to make that choice.

Sexual harassment

When referring to sexual harassment we mean 'unwanted conduct of a sexual nature' that can occur online and offline. When we reference sexual harassment, we do so in the context of child on child sexual harassment.

Sexual harassment is likely to: violate a child's dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment.

Sexual harassment can include:

- 'Upskirting'. This 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. It is now a criminal offence
- sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names;
- sexual "jokes" or taunting;
- physical behaviour, such as: deliberately brushing against someone, interfering with someone's clothes and displaying pictures, photos or drawings of a sexual nature;

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- online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence.

It may include:

- non-consensual sharing of sexual images and videos;
- sexualised online bullying;
- unwanted sexual comments and messages, including, on social media; and
- sexual exploitation; coercion and threats

The response to a report of sexual violence or sexual harassment

The initial response to a report from a child is important. It is essential that all victims are reassured that they are being taken seriously and that they will be supported **and kept safe**. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

It is important for the member of staff receiving the disclosure to :

- Not promise confidentiality (as this information will need to be shared with a designated safeguarding lead who may need to involve other agencies)
- Listen carefully and non-judgementally to the child and offer them reassurance without asking leading questions
- Make a record of the disclosure. It would be best practice to summarise after the disclosure has been made but it is acceptable to make notes during the discussion and check understanding as the discussion ends. **It is essential that a written record is made and that its accuracy is checked with the person making the report**
- Ensure, where there is an online element that the guidance in Appendix E is followed (in particular to not view or forward illegal images of a child)
- If at all possible have 2 members of staff present when the disclosure is being made (This is not compulsory as it will not always be possible due to the wishes of the young person or availability of staff).
- Inform a designated safeguarding lead immediately of the report and to pass the information securely to them.