Policy

Safeguarding Policy 2026-2027 **(effective 1st September 2026)**

This policy is reviewed annually by the Trustees.

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Staff Lead	Designated Safeguarding Lead
Approved by	Trustees

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→ Amended for new academic year 2026-7

***Equality Impact Assessment**: Homefield College recognises the importance of the Equality Act 2010 and its duties under the Act. This document has been assessed to ensure that it does not adversely affect staff, students, or stakeholders on the grounds of any protected characteristics*

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Policy Overview

Policy Statement

Homefield College fully recognises the contribution that it can make to protect and support both children and adults at risk of abuse within the College. We recognise that it is everyone's responsibility to safeguard and promote the welfare of children and it is of paramount importance.

We recognise the moral and statutory responsibility placed on all staff and Trustees to safeguard and promote the welfare of all children and adults at risk. We aim to provide a safe and welcoming environment in which children and adults can learn, underpinned by a culture of openness where both children and adults feel secure, are able to raise concerns and believe they are being listened to, and that appropriate action will be taken to keep them safe. Where the word 'children' is used in this policy, adults at risk are included.

Scope and Purpose

This policy provides definitions of safeguarding and types of abuse, direction and guidance on how to recognise and respond to safeguarding concerns and ensures that all employees and trustees are aware of the procedures and practice to be followed in all matters relating to the safety and wellbeing of students and those who use college services.

This includes staff and volunteers, as well as children and young people and their families, with the overarching principles that guide our approach to child protection. This policy applies to anyone working on behalf of Homefield College, including senior managers and the Board of Trustees, paid staff, volunteers, sessional workers, contractors, agency staff, and to visitors and students.

We recognise that safeguarding and child protection is the responsibility of all. We will ensure that all parents / carers and other working partners are aware of this policy by displaying appropriate information in our reception / communal areas and on the College's website.

Where the College provides services or activities directly under the supervision or management of staff, the College's arrangements for safeguarding will apply. Where services or activities are provided separately by another body, the College will seek assurance in writing that the body concerned has appropriate policies and procedures in place to safeguard and protect children and adults at risk, and that there are arrangements to liaise with the College on these matters.

With regards to safeguarding children, this applies to anyone regardless of disability, under the age of 18. For adults in need of safeguarding, they are 18 or over and in receipt of, or may need, community care services by reason of mental or other disability, age, or illness.

This policy is written within the guidelines of the Safeguarding Adults: Multi-Agency Policy and Procedures, Leicester, Leicestershire and Rutland and the Leicester City, Leicestershire, and Rutland Local Safeguarding Partnership - Multi-agency Safeguarding Arrangements.

Extended College activities

Where the Trustees provide services or activities directly under the supervision or management of the College, the College's arrangements for child protection and adults in need of safeguarding will apply. Where the services are provided by another organisation, the Trustees will seek assurance in writing that the body concerned has appropriate policies and procedures in place to safeguard and protect those at risk.

Related Legislation

The policy is consistent with the following legal duties:

Section 175 of the Education Act 2002

Department of Education's statutory guidance 'Keeping Children Safe in Education' (KSCIE) September 2026, which replaces 'Keeping Children Safe in Education' (March 2015) and 'Safeguarding Children and Safer Recruitment in Education' (December 2006), and '**Working Together to Safeguard Children' 2026** (incorporating the unified local 'Family Help' model).

Data Protection Act 2018 the UK GDPR, and the newly enacted Data (Use and Access) Act 2025.

Specifies the principles of which data should be held and processed lawfully and the rights an individual has in relation to their own data.

Equalities Act 2010

Protects employees and wider society from discrimination.

The Care Act 2014

The College recognises that many learners aged 18 years and above may meet the definition of an adult at risk. Safeguarding practice will therefore be informed by the Care Act 2014, the Mental Capacity Act 2005, Making Safeguarding Personal principles and local safeguarding adults procedures alongside child protection requirements for learners under 18.

For students aged 18 and over, safeguarding responsibilities under the Care Act 2014 operate alongside child protection requirements for learners under 18. Staff will ensure decisions are appropriately informed by assessments of mental capacity and the principles of Making Safeguarding Personal.

The Mental Capacity Act 2005

This sets out very clearly how we assess for capacity and make best interest decisions. Assumptions about a person's capacity to make decisions cannot be based upon their condition, appearance, behaviour, or age.

Sexual Offences Act 2003

The Sexual Offences Act 2003 makes it an offence for a person over 18 (e.g., a teacher / tutor or other member of staff / contractor / volunteer / visitor) to have a relationship with a child under 18 where the person is in a position of trust in respect of that child, even if the relationship is consensual. This applies where the child is in full-time education and the person works in the same establishment as the child, even if they do not teach the child.

Human Rights Act 1998

This gives everyone the right to live free from abuse and violence and degrading treatment.

Public Interests Disclosure Act 1998

This protects workers from detrimental treatment or victimisation from their employer if, in the public interest, they blow the whistle on wrongdoing.

Workers are protected from dismissal and a right not to be subjected to any ‘detriment’ from their employer if they make a ‘protected’ disclosure.

Key Roles & Responsibilities

Trustee Board

The Board of Trustees has a strategic leadership responsibility for the College's safeguarding arrangements and must ensure that they comply with their duties under legislation. The Board will ensure they facilitate a whole-college approach to safeguarding. This means involving everyone in the College and ensuring safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development, and that all systems, processes and policies are transparent, clear, and easy to understand and operate with the best interests of the child at their heart.

The Board will ensure that where there is a safeguarding concern, College leaders will make sure the child's wishes and feelings are considered when determining what action to take and what services to provide. Systems will be in place that are well-promoted, easily understood and easily accessible for children to confidently report any form of abuse, knowing their concerns will be treated seriously, and knowing they can safely express their views and give feedback.

In accordance with the statutory guidance 'Keeping Children Safe in Education' 2026, the Trustees will ensure that:

- There are effective policies, procedures, and training in place to ensure compliance with safeguarding guidelines and that these are updated annually or when required and is publicly available. This includes a 'behaviour code of conduct for staff and volunteers'.
- Safer recruitment practices are followed, including the appropriate use of references and DBS / other checks on new staff and volunteers. Furthermore, those involved in the recruitment process will undertake 'safer recruitment training'.
- Trustees will receive safeguarding training at induction and regular updates thereafter to ensure they are able to provide effective strategic challenge and oversight of safeguarding arrangements.
- There are procedures for dealing with allegations of abuse against members of staff and volunteers, including low level concerns (See Appendix J).
- The Principal is designated to take responsibility for dealing with child protection and there is always appropriate cover for this role to deal with before / after College and out-of-term-time activities.

The Designated Safeguarding Lead and Deputy Designated Safeguarding Leads undertake appropriate safeguarding training every two years and update their knowledge and skills regularly through safeguarding briefings, professional development, local authority updates, reading and networking activities to ensure they remain aware of emerging safeguarding issues and changes in local and national practice.

- Any deficiencies or weaknesses are brought to the attention of the Trustees and will be rectified without delay.
- Safeguarding training for staff, including online safety training, is integrated, aligned, and considered as part of the whole-college safeguarding approach and wider staff training and curriculum planning.
- There are opportunities to promote good practice in safeguarding, particularly online safeguarding, within the curriculum and activities of the College.

- The Chair of the Trustees (or in the absence of the Chair, the Vice Chair) deals with any allegations of abuse made against the Principal, in liaison with the Local Authority Allegations Manager (LADO).

- They are doing all that they can to mitigate the safeguarding risks posed by online activities. This includes ensuring there are **annual, documented effectiveness reviews** of filtering and monitoring systems across all internet-connected devices in all college locations to check their effectiveness and meet the DfE guidance 'filtering and monitoring standards'.

- There is a nominated member of the Trustee Board who champions issues concerning safeguarding within the College – this is currently David Jackson. 26-27

  The College contributes to inter-agency working in line with statutory guidance *'Working Together to Safeguard Children 2026'*, including active alignment with local **early help/ Family Help** arrangements to streamline early interventions before statutory social care thresholds are met.

- The College also works with other agencies and professionals as required to do so and if legal advice and services are needed in a Safeguarding Adults investigation, they will be brought in by the lead agency (health or social care).

Principal

The Principal will ensure that the policies and procedures adopted by the Trustees are fully implemented and that sufficient resources, time and training are provided to enable staff members to fulfil their safeguarding responsibilities and contribute effectively to a whole-college approach to safeguarding. The Principal will be responsible for ensuring a culture of safety and ongoing vigilance that fosters the belief that 'it could happen here'.

The Principal has the duty to ensure that:

- Allegations of abuse or concerns that a member of staff or adult working at the College may pose a risk of harm to a child or young person are notified to the Local Authority Allegations Manager, where the threshold is met.
- All staff and volunteers feel able to raise concerns about poor or unsafe practice regarding children, and such concerns are addressed sensitively and effectively in a timely manner. The NSPCC whistle blowing helpline number is also available (0800 028 0285).
- All staff are made aware that they have an individual responsibility to pass on safeguarding concerns and that if all else fails to report these directly to Children's Social Care (Children's Services), Adult Social Care or the Police.
- A single central record is kept and maintained.

Designated Safeguarding Lead

- The responsibilities of the Designated Safeguarding Lead are found in Annex C of 'Keeping children safe in education'. The role must be clearly stated in the job description of those responsible. The College will ensure that the Designated Safeguarding Lead has the status, authority, capacity, time, funding, training and support necessary to fulfil the

responsibilities of the role effectively. Appropriate and suitably trained deputy DSLs will be available to provide cover.

The DSL must:

- Ensure the provision of information to other agencies on safeguarding and child protection in compliance with section 14B of the Children Act 2004 and any enquiries under section 47 of the Children Act 1989 and police investigations, to liaise with staff.
- Liaise with the Trustee Board and the Local Authority on any deficiencies brought to the attention of the Trustee Board and how these should be rectified without delay.
- Ensure the Management and Referral of cases of suspected abuse to Adult Social Care or Specialist Services First Response Children's Duty / Local Authority Children's Social Care, Channel (and / or Police where a crime may have been committed) and to the Disclosure and Barring Service.
- Act as a source of support, advice and expertise within the College.
- Attend and contribute to child protection conferences and Safeguarding Adults Reviews when required.
- Be alert to the specific needs of adults and children in need, those with educational needs, young carers, looked after or previously looked after children and those at risk due to their own or family members mental health needs.
- Understand the needs of children and young people - encouraging a culture of listening to all children and young people (especially and including those who are known to be disproportionately impacted upon by different forms of harm and abuse i.e., LGBTQ+ students, or women and girls) and take account of their wishes and feelings in measures taken to protect them and understanding the difficulties that young people may have in approaching staff about their circumstances.
- Ensure each member of staff has access to and understands the College's Safeguarding policy, especially new or part-time staff who may work with different educational establishments.
- Ensure all staff understands the Safeguarding Policy and is able to recognise and report any concerns immediately they arise.
- Keep detailed, accurate and secure written records of concerns and referrals.
- Obtain access to resources and effective training for all staff and attend refresher training courses every 2 years. Keep up-to-date with new developments in safeguarding by accessing briefings and journals.
- Where children leave the College, ensure their child protection file is handed to the Designated Safeguarding Lead and signed for in the new college as soon as possible.
- Maintain and monitor child protection and safeguarding records, including monitoring and acting upon individual concerns, patterns of concerns (e.g. children who repeatedly go missing) or complaints, in accordance with the section on "Records, Monitoring and Transfer" below.
- Ensure that effective filtering and monitoring systems are in place in accordance with the age, needs and vulnerabilities of learners and that these systems are tested, reviewed and evaluated **annually** to ensure their effectiveness.

- Ensure **robust cover and deputy arrangements** are permanently in place (including a confidential, shared safeguarding mailbox or equivalent technical system) to guarantee that all incoming safeguarding alerts are intercepted and acted upon without delay.

  Understand and navigate local early help/**Family Help** arrangements, referral pathways and thresholds for statutory intervention ensuring the college's early help pathways seamlessly integrate targeted early help/family help and Section 17 support frameworks and that staff are familiar with these processes.

All staff

As required by Keeping Children Safe in Education 2026, all staff members, regardless of role, must read and understand Part One: Safeguarding Information for All Staff and formally confirm this through induction and annual safeguarding updates.

Staff may additionally be provided with the DfE Overview for All Staff as a supplementary reference document; however, this does not replace the requirement to read Part One.

 All staff must exercise heightened professional curiosity regarding student mental health, recognizing that severe mental health issues can escalate into severe safeguarding concerns, including **self-harm, suicidal ideation, and acute risk of suicide**.

 All staff must immediately report any distinct concern or intelligence regarding a child **carrying or using a weapon** directly to the **DSL**.

All those who work with, or on behalf of, our students have a responsibility to safeguard and promote their welfare and wellbeing. This includes the responsibility to be alert to possible abuse and to record and report abuse and to record and report concerns to a member of the safeguarding team. The names of the Designated Safeguarding Lead and the Deputy Leads for the current year are listed at the end of this document.

- All students will have individual care plans and risk assessments that staff must familiarise themselves with before working with them.
- These risk assessments detail the support and possible restrictions that must be put in place to keep individuals safe from risks including possible abuse. They also contain information to promote the general wellbeing and health of the individual.
- Managers, Site Co-ordinators, Tutors and Session Leaders must ensure that staff are fully aware of this and that they are given time to read them.
- All staff will receive training at their induction, and this will be refreshed regularly (at least annually) to ensure that they can identify abuse and understand organisational procedures and their responsibilities including that which relates to the College filtering and blocking systems.
- In addition, all staff members will receive regular safeguarding and child protection (including online safety) updates (for example, via email, e-bulletins, staff meetings) as required, but at least annually, to provide them with relevant skills and up-to-date knowledge of emerging and evolving safeguarding issues to safeguard children effectively.
- All staff will have Prevent Duty training to enable them to identify those who are at risk of being drawn into radicalisation and to challenge extremist ideas.

- All staff should be aware of the process for making referrals to children's social care and for statutory assessments under the Children Act 1989 that may follow a referral, especially section 17 (children in need) and section 47 (a child suffering, or likely to suffer, significant harm) along with the role they might be expected to play in such assessments.

All staff should be aware of local Early Help / Family Help arrangements and understand their role within these processes. This includes providing support as soon as concerns emerge, liaising with the DSL and working with other agencies where appropriate to prevent concerns escalating.

- Staff and Trustees will receive training in specific areas to develop their safeguarding knowledge, particularly e-safety.

As part of Keeping Children Safe in Education 2026, all staff will be required to read Part One: Safeguarding Information for All Staff and confirm their understanding during induction, annual appraisal or formal supervision.

- Staff will ensure that good records are kept.

Raising Awareness and Safeguarding in the curriculum

Support for Students

The College recognises that mental health concerns may be an indicator that a student has suffered, or is at risk of suffering, abuse, neglect or exploitation. All staff should be alert to emerging indicators of mental health difficulties and should report concerns promptly to the safeguarding team so that appropriate support can be considered. Mental health concerns will be considered alongside wider safeguarding information and risk factors

The College recognises that children and young people who are abused or who witness abuse and violence including what they see, hear or experience its effects may find it difficult to develop a sense of self-worth and view their lives in a positive way, which is likely to impact upon their mental health and emotional wellbeing. As a result the safeguarding team and tutors have received training from Operation Encompass.

The College works closely with partner agencies and information-sharing arrangements to understand and respond appropriately to the impact of domestic abuse and adverse childhood experiences on learners.

All students at the College are vulnerable because they have special educational needs, but additionally there may be additional risk factors such as those in residential care or in supported living.

It is important that staff recognise that mental health concerns can be an indicator of suffering previous abuse, neglect, or exploitation. Staff are well placed to observe the students and to identify the behaviours that suggests that they are experiencing a mental health problem or may be at risk of developing one. Staff will monitor and support attendance and refer to safeguarding where this becomes a concern.

We recognise that where children have previously suffered abuse and neglect or other previously traumatic adverse childhood experiences (ACEs) that this can have a lasting impact into adulthood.

Staff should report all concerns about mental health by raising a concern. Safeguarding staff will work with the College's therapy team where appropriate or will refer externally where there are more serious concerns.

Support for Staff

As part of their duty to safeguard and promote welfare and safeguarding, staff may hear information, either from the child / young person / beneficiary as part of a disclosure or from another adult that will be upsetting.

Where a member of staff is distressed as a result of dealing with a safeguarding concern, they should in the first instance speak to a Safeguarding Officer about the support they require. The Safeguarding Officer should seek to arrange the necessary support.

Raising Awareness

Students receive training and advice about keeping safe and living a healthy lifestyle which includes mental wellbeing. This is delivered in a variety of ways in sessions by their tutors or through work with personal and support tutors.

This awareness raising includes the safe use of the internet and other types of social media. This may include covering relevant issues through Relationships Education and Relationships and Sex Education, tutorials and / or where delivered, through Personal Development education.

Safeguarding in the Curriculum

The College ensures that safeguarding is a key part of the curriculum. Some aspects are taught as discreet lessons as part of the Personal Development curriculum and others are embedded within the wider curriculum. Some aspects may be covered in personal tutorial as part of individualised programmes where there are specific concerns. Content will also depend upon the development of the young person concerned.

- Bullying (including cyberbullying)
- Drugs, alcohol, and substance misuse (including awareness of County Lines and the criminal exploitation of children and modern slavery where appropriate)
- Online Safety and the danger of meeting with strangers
- Fire Safety
- Workplace Safety
- Road Safety
- Healthy Relationships / Consent
- So called Honour-Based abuse e.g., forced marriage, Female Genital Mutilation (FGM) (See appendix E)
- Sexual exploitation of young people (including online and cyber-crime)
- Preventing extremism and Radicalisation

Online safety

- **Content:** Exposure to illegal, inappropriate, or harmful material. This explicitly includes exposure to extreme sexual or physical violence, radicalization material, as well as digital misinformation, disinformation, fake news, and conspiracy theories.
- **Contact:** Harmful online interactions. This includes the risk of grooming, peer-on-peer exploitation, and **harmful or deceptive automated interactions with Artificial Intelligence (AI) bots**.
- **Conduct:** Personal online behaviour that causes harm. This includes the sharing of self-generated intimate images or videos, **formally expanding to include AI-generated material, deepfakes, and digitally manipulated imagery**. Under UK law, the non-consensual creation of intimate deepfakes is a criminal offense.
- **Commerce:** Risks from commercial exploitation, financial scams, identity theft, and aggressive marketing targeted at vulnerable individuals.

Staff and institutional systems will actively monitor the safe, ethical use of Generative AI tools within the education environment to guard against misinformation and algorithmic exploitation.

We recognise that technology is a significant component in many safeguarding and wellbeing issues and that young people are at risk of abuse online as well as face-to-face. Some may use mobile and smart technology, whilst at college and outside of college, to sexually harass their peers, share indecent images (consensually and non-consensually) and view and share pornography and other harmful content.

Many have unrestricted access to the internet via their mobile phones and our online-safety policy and IT acceptable use policy describes the rules governing their use in college. It also sets out the College's response to incidents which may involve one or more of the seven areas of risk – content, contact, conduct and commerce. Disinformation, mis information and conspiracy theories.

Staff will always respond if informed that young people have been involved in the consensual or non-consensual sharing of self-generated intimate images and videos, including AI-generated intimate images and deepfakes.

The College recognises cyber security as an important safeguarding consideration. Weak cyber security arrangements may place students, particularly vulnerable learners, at increased risk through exposure of personal information, disruption of safeguarding systems or access to harmful online content. The College will maintain appropriate technical and organisational measures to protect systems, data and users. The college has Smoothwall technology operating within all internal devices to ensure that the Department of Education's filtering and monitoring standards are met.

Working with Parents / Carers

The College will:

- Ensure that parents / carers understand the responsibility placed on the College and staff for safeguarding via the website.
- Undertake appropriate discussion with parents / carers prior to involvement of Children & Family Services Children's Social Care or another agency, unless to do so would place the child at risk of harm or compromise an investigation.
- Inform parents / carers who are under 18 and those 18 and over who do not have the mental capacity to make their own decisions regarding this. For those individuals 18 and over who have the mental capacity to make their own decisions, they should be asked whether they want their parents to be informed or not and this should be respected.

Recruitment and Selection of Staff

The College's safer recruitment processes will follow the Statutory Guidance: *Keeping Children Safe in Education September 2026 Part Three: Safer Recruitment.*

The College will provide all the relevant information in references for a member of staff about whom there have been concerns about child protection / inappropriate conduct. Cases in which an allegation has been proven to be unsubstantiated, unfounded, false, or malicious will not be included in employer references. A history of repeated concerns or allegations which have all been found to be unsubstantiated, malicious etc. will also not be included in a reference.

The College has an open safeguarding ethos regularly addressing safeguarding responsibilities during staff meetings and fostering an ongoing culture of vigilance. All new staff and volunteers receive a safeguarding induction.

In line with statutory requirements, at least one person conducting an interview must be trained in safer recruitment techniques having undertaken safer recruitment training either online or by attending the Local Authority one-day Safer Recruitment training course.

In addition, as part of the shortlisting process, the College conducts an online search as part of their due diligence on the shortlisted candidates. This may help identify any incidents or issues that have happened, and are publicly available online, which the College might want to explore with the applicant at interview. Shortlisted candidates are informed that online searches may be done as part of due diligence checks.

The College will maintain a single central record of all recruitment checks carried out for staff.

Regulated Activity and Volunteers

The College will ensure that all recruitment, volunteer and vetting decisions comply with the current requirements of Keeping Children Safe in Education 2026, the Safeguarding Vulnerable Groups Act 2006 and Disclosure and Barring Service guidance regarding regulated activity.

Trainee Teachers & Allegations

Part Four procedures for handling safeguarding allegations and low-level concerns explicitly apply to **trainee teachers** placed within the college environment, alongside permanent staff, supply staff, and contractors.

Records, monitoring and transfer

- Well-kept records are essential to good safeguarding practice. The Designated Safeguarding Lead is responsible for such records and for deciding at what point these records should be passed over to other agencies.

- Records relating to actual or alleged abuse or neglect are stored apart from normal students or staff records. Normal records sometimes have markers to show that there is sensitive material stored elsewhere. This is to protect individuals from accidental access to sensitive material by those who do not need to know.

- Safeguarding records are stored securely, with access confined to specific staff, e.g., Designated Safeguarding Leads and Safeguarding team.

- Safeguarding records are reviewed at weekly safeguarding meetings to check whether any action or updating is needed. This includes monitoring patterns of complaints or concerns about any individuals and ensuring these are acted upon.

- When beneficiaries transfer, their safeguarding records are also transferred. Safeguarding records will be transferred separately from other records and best practice is to pass these with discussion or explanation and to obtain a signed and dated record of the transfer. Files requested by other agencies e.g., Police should be copied.

- All staff should have a due regard to the data protection principles, which allow them to share personal information as provided for in the Data Protection Act 2018 and the UK GDPR requirements.

- Where records contain information about allegations of sexual abuse, we will preserve these for the Independent Inquiry into Child Sexual Abuse (IICSA), for the term of the inquiry. We will retain these records at least until the individual has reached normal pension age, or for 10 years from the date of the allegation if that is longer.

Recognising concerns - signs and indicators of Abuse, neglect and exploitation.

All staff should be aware of indicators of abuse, neglect and exploitation so that staff are able to identify cases of children who may need help or protection. Staff should be aware that children can be at risk of harm inside and outside of College, inside and outside of home and online.

Staff should exercise professional curiosity and know what to look for as this is vital for the early identification of abuse or neglect.

All staff should be aware that abuse, neglect, and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap with one another. All staff should consider whether children might be at risk of abuse of exploitation in situations outside their families – harms take a variety of different forms and children can be vulnerable to multiple harms including sexual abuse (including harassment and exploitation), domestic abuse in their own intimate relationships (teenage relationship abuse), criminal exploitation, serious youth violence, county lines and radicalisation.

All staff should be aware that technology is a significant component in many safeguarding and wellbeing issues and recognise that children are at risk of abuse and other risks online as well as face-to-face. In many cases, abuse will take place concurrently both online and offline. Children can also abuse other children online; this can take the form of abusive, harassing, and misogynistic / misandrist messages, the non-consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography to those who do not want to receive such content.

In all cases, if staff are unsure, they should always speak to the DSL.

Prevent (concerns about extremism / radicalisation)

Early reporting of any concern, however trivial, is essential to prevent escalation in the case of an actual threat / risk. The College DSLs are the first point of contact for staff where concerns have been raised. The College PREVENT lead is Gemma Starbuck who has links with Regional Prevent Co-ordinators and specialist police advisors via a regional 'Channel Co-ordinator'.

Observation of changes in learner behaviour, particularly in those students who are most at risk due to their culture or religion: staff should be aware of changes in student behaviour, particularly isolation or withdrawal from activities previously enjoyed. In this instance, speak with the student to try to establish the cause – if in doubt, seek advice. Any unexplained absences where the learner cannot be contacted, or the family are unable to satisfactorily explain the student's absence or state their whereabouts, should be followed up by a Safeguarding Officer.

External Influences: report any literature, whether in the form of books, leaflets or posters, that promote extremist activities to the DSL.

Part B

Procedure to follow in cases of possible, alleged, or suspected abuse, or serious cause for concern about a child.

For cases not involving allegations against a member of staff.

Guidelines for staff

1. The Local Safeguarding Board Procedures contain the inter-agency processes, protocols, and expectations for safeguarding children. (Available on LRSB website www.lrsb.org.uk). The Designated Safeguarding Lead is expected to be familiar with these, particularly the referral processes.

2. It is important that all parties act swiftly and avoid delays.

3. Any person may seek advice and guidance from the First Response Children's Duty Professionals Consultation Line, particularly if there is doubt about how to proceed. Any adult, whatever their role, can act in their own right to ensure that an allegation or concern is investigated and can report to the investigating agencies.

4. A record, dated and signed, must be made about what has been alleged, noticed, and reported, and kept securely and confidentially.

5. In many cases of concern, there will be an expectation that there have already been positive steps taken to work with parents and relevant parties to help alleviate the concerns and effect an improvement for the child. This is appropriate where it is thought a child may be in need in some way and require assessment to see whether additional support and services are required. An example might be where it is suspected a child may be the subject of neglect. In most cases, the parents' knowledge and consent to the referral are expected unless there is reason for this not being in the child's interest. However, there will be circumstances when informing the parent / carer of a referral that might put the child at risk, and in individual cases advice from Children's Social Care will need to be taken.

Receiving a disclosure

1. If a child is suffering or likely to suffer from harm, or is in immediate danger, inform a safeguarding officer as soon as possible via telephone.

2. When a child makes a disclosure, or when concerns are received from other sources, do not investigate, ask leading questions, examine children, or promise confidentiality. Children making disclosures should be reassured and if possible, at this stage should be informed what action will be taken next.

3. As soon as possible write a dated, timed, and signed information report of what has been disclosed or noticed, said, or done and contact a Safeguarding Officer via the College Safeguarding system.

4. If the concern involves the conduct of a member of staff or volunteer, a visitor, a trustee, a trainee or another young person or child, the Safeguarding Officer will ensure that the Principal is informed.

5. If the allegation is about the Principal, the information should normally be passed to the Chair of Trustees or the Local Authority Allegations Manager (LADO).

6. If this has not already been done, inform the child (or other party who has raised the concern) what action you have taken.

Designated Safeguarding Lead / Deputy DSL – main procedural steps

1. Begin a case file which will hold a record of communications and actions to be stored securely (see Section on Records, Monitoring and Transfer).

2. Where initial enquiries do not justify a referral to the investigating agencies, ensure that the records and any action taken are logged. It may be necessary to monitor the situation. If in doubt, seek advice from the First Response professionals Consultation line.

3. Share information confidentially with those who need to know.

4. Where there is a child protection concern requiring immediate, same day, intervention from Children's Social Care (Priority 1), the First Response Children's Duty should be contacted by phone. Written confirmation should be made within 24 hours on the LRSB Agency Referral Form to Children's Social Care. All other referrals should be made using the online form (see link http://lrsb.org.uk/childreport).

5. If the concern is about children using sexually abusive behaviour, also refer to the separate guidance, 'Guidance for schools working with children who display harmful sexual behaviour' (Leicestershire LA Guidance).

6. If it appears that urgent medical attention is required, arrange for the child to be taken to hospital (normally this means calling an ambulance) accompanied by a member of staff who must inform medical staff that non-accidental injury is suspected. Parents must be informed that the child has been taken to hospital.

7. Exceptional circumstances: If it is feared that the child might be at immediate risk on leaving the College, take advice from the First Response Professionals Consultation line (for instance about difficulties if the college day has ended, or on whether to contact the police). Remain with the child until the Social Worker takes responsibility. If in these circumstances a parent / carer arrives to collect the child, the member of staff has no right to withhold the child, unless there are current legal restrictions in force (e.g., a restraining order). If there are clear signs of physical risk or threat, First Response Children's Duty should be updated, and the Police should be contacted immediately.

Leicestershire

- Safeguarding Children 0116 305 0005 (24 hrs a day) for urgent concerns
- Prevent Engagement Team 0116 248 6726

Warwickshire

- Safeguarding Children (MASH) 01926 414144 Out of hours 01926 886922
- Prevent Referrals prevent@warwickshireandwestmercia.pnn.police.uk

Process for dealing with allegations against staff (including the Principal) supply staff and volunteers.

These procedures should be followed in all cases in which there is an allegation or suspicion that a person working with children has:

- behaved in a way that has harmed a child or may have harmed a child.
- possibly committed a criminal offence against or related to a child.
- behaved towards a child or children in a way that indicates they would pose a risk of harm to children.

There is also a college low level concerns policy (Appendix J) which should be followed if the concern does not meet the allegations threshold above or is not considered serious enough to make a referral to the LADO.

Relevant documents: Department for Education, Keeping Children Safe in Education 2026, Part Four: Safeguarding Concerns or Allegations Made About Staff, including Supply Staff, Volunteers and Contractors.

Individual Staff / Volunteers / Other Adults who receive the allegation:

- Write a dated and timed information report of what has been disclosed or noticed, said, or done.
- Report immediately to the Designated Safeguarding Lead. The Principal will be informed.
- Pass on the written record.
- If the allegation concerns the conduct of the Principal, report immediately to the Chair of Trustees. Pass on the written record.
- (If there is difficulty reporting to the Chair of Trustees, contact the Allegations Manager, [LADO] Safeguarding and Performance Unit as soon as possible.)

Principal (or Chair of Trustees)

- If there is no written record, write a dated and timed information report of what has been disclosed or noticed, said, or done.
- Before taking further action notify and seek advice from the Allegations Manager, Safeguarding and Performance Unit on the same day.
- You may be asked to clarify details or the circumstances of the allegation, but this must not amount to an investigation.
- Report to First Response Children's Duty if the Allegations Manager so advises or if circumstances require a referral concerning a child.

- Ongoing involvement in cases:
    - Liaison with the Allegations Manager
    - Co-operation with the investigating agency's enquiries as appropriate.
    - Consideration of employment issues and possible disciplinary action where the investigating agencies take no further action.

Possible referral to the Disclosure and Barring Service (DBS) or the National College for Teaching and Leadership (NCTL), depending on the outcome. This is a legal duty and failure to refer when the criteria are met is a criminal offence.

https://www.gov.uk/government/collections/dbs-referrals-guidance--2
ICO Employment Information Overview

Whistle Blowing

This is an integral part of safeguarding and protecting adults in need of safeguarding.

A whistle blower is someone who discovers something that is wrong and alerts their employer or the relevant authorities to what is going on. If a member of staff sees abuse (or what appears to be abuse), they should report to a Safeguarding Officer and explain the concerns. If the member of staff is not satisfied with their response, or if the Officer is seen to be colluding with inadequate care, the member of staff is expected to report the concern to the Principal. The first concern must be the protection and safety of the individual who is vulnerable and may need the staff to voice concern on their behalf.

The law protects whistle blowers from their employer subjecting them to detriment or dismissal by reason of their having "blown the whistle" and from detrimental treatment by their colleagues. To be protected by the law, the act of whistleblowing must fall within the legal rules and the whistle blower must reasonably believe that their disclosure of wrongdoing is made in the public interest.

Any person who criticises or victimises a bona fide whistleblower will be liable to disciplinary action.

1. Seek advice or support from a professional body or union if you feel in need of advice and / or support when whistleblowing.
2. Always check that action has been taken.

After you have raised a concern, we will decide how to respond, which will usually involve making internal enquiries, but it may become necessary to carry out a full investigation – this may be formal or informal depending on the nature of the concern raised. We will endeavour to complete investigations within a reasonable time. We will keep you informed of progress and let you know when the investigation is completed. We will not be able to inform you of any matters that would infringe any duty of confidentiality owed to others.

You can also call the independent whistleblowing charity Public Concern at Work for free and confidential advice on 020 7404 6609.

- NSPCC whistle blowing helpline number is also available (0800 028 0285).

Appendices

APPENDIX A: Contextual Safeguarding

- In KCSiE 2020 the DfE refer to contextual safeguarding as a specific term that has come out of research from the University of Bedfordshire.

- The definition of Contextual Safeguarding is “an approach to understanding, and responding to, young people’s experiences of significant harm beyond their families. It recognises that the different relationships that young people form in their neighbourhoods, schools and online can feature violence and abuse. Parents and carers have little influence over these contexts, and young people’s experiences of extra-familial abuse can undermine parent-child relationships. Therefore, children’s social care practitioners need to engage with individuals and sectors who do have influence over / within extra-familial contexts, and recognise that assessment of, and intervention with, these spaces are a critical part of safeguarding practices.

- Contextual Safeguarding, therefore, expands the objectives of child protection systems in recognition that young people are vulnerable to abuse in a range of social contexts. As a college, we will consider the various factors that have an interplay with the life of any student about whom we have concerns within the college and the level of influence these factors have on their ability to be protected and remain free from harm, particularly when it comes to child exploitation or criminal activity. While this term applies to this specific definition, the notion of considering a child within a specific context is also important. What life is like for a child outside of the college, within the home, within the family and within the community are key considerations when the DSL is looking at any concerns.

APPENDIX B: Definitions of Abuse

Young Person:

Physical Abuse.
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 / young person.

Neglect.
The persistent failure to meet a young person'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 because 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 caregivers); or
- ensure access to appropriate medical care or treatment.

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

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 penetration with an object) 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 / young person in preparation for abuse. Sexual abuse can take place online , and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

Emotional Abuse.
The persistent emotional maltreatment of a child / young person such as to cause severe and persistent adverse effects on their emotional development. It may involve conveying to children 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 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 / young person, though it may occur alone.

Prevention of Abuse
The college will identify and provide opportunities for young people to develop skills, concepts, attitudes, and knowledge to promote their safety and wellbeing, by addressing relevant issues in tutorials and other areas of the curriculum.

Adults

Physical Abuse.
This includes injuries **that** are not explained satisfactorily or where there is concern that the injury was inflicted intentionally. Pushing, shaking, pinching, slapping, **punching,** and force-feeding could come into this category depending on the circumstances in which they occurred.

Physical abuse can also include situations where people are caused unreasonable physical discomfort through the withholding of care or the application of inappropriate techniques or treatment. Deprivation and forcing of food and water and involuntary isolation and confinement (e.g., inappropriate methods of restraint) can be physical abuse. Physical abuse can include forcing of prescribed or non-prescribed medication against the person's will or covertly medicating without a DOLS authorisation and best interest plan.

Sexual Abuse.
This includes rape and sexual assault or sexual acts to which the vulnerable adult has not consented, or could not consent to, or was pressured into consenting. Sexual abuse can occur between people of the same **sex,** and it can also occur within a marriage or any long-term relationship. A relationship of trust should exist between a member of staff or a volunteer and the person for whom they are caring. It would be seen as a betrayal of that trust, and therefore abusive, for that member of staff or volunteer to have a sexual relationship with the person for whom they care.

Psychological Abuse.
This includes intimidation, humiliation, shouting, swearing, emotional blackmail, bullying and the denial of basic human and civil rights (including choice and opinion, privacy and dignity and allowing people to follow their own spiritual or cultural beliefs or choice about their own sexuality).

Financial or Material Abuse.
This includes theft, fraud, exploitation, pressure in connection with wills, property, enduring power of attorney, or inheritance or financial transactions, or the inappropriate use, misuse or misappropriation of property, possessions, or benefits.

Neglect or Acts of Omission.
Ignoring or withholding physical or medical care needs. The deprivation of help to perform activities of daily living and failure to intervene in behaviour which is dangerous to the individual concerned or to others. Allowing a person judged to lack capacity to make decisions to take unwarranted and unreasonable risks.

Neglect may be regarded not only as the commission or omission of an act, but also the threat of risk of such.

Discriminatory.
A violation of human and civil rights by any other person or persons. This is abuse which is racist or sexist in nature or about a person's disability or sexuality. Any form of harassment or bullying. There is some cross-over with other forms of abuse.

Organisational.
When the lifestyles of individuals are sacrificed in favour of the rituals, routines and / or restrictive practices of the home or care setting. Care may not be individualised, rules may be used inappropriately and there may be a lack of stimulation.

Self-Neglect.
A wide range of behaviour such as neglecting to care for personal hygiene, **health,** or surroundings. This could include hoarding, failure to complete personal care or attend to own health needs.

Domestic Abuse.
This involves an incident or pattern of incidents of controlling, coercive or threatening behaviour, **violence,** or abuse by someone who is or has been an intimate partner or family member regardless of gender or sexuality. This could include psychological, physical, sexual, financial, emotional, 'honour based' violence, female genital mutilation or forced marriage.

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

All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Experiencing domestic abuse can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

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

Modern Slavery.
Traffickers and slave masters use whatever means they have at their disposal to coerce, **deceive,** and force individuals into a life of abuse, **servitude,** and inhumane treatment. Including human trafficking, forced labour, domestic **servitude,** and sexual exploitation.

Female Genital Mutilation

Starting in October 2015, section 5B of the Female Genital Mutilation Act 2003 and section 74 of the Serious Crime Act 2015 placed a mandatory duty on teachers along with social workers and healthcare professionals to report to the police where they discover that FGM appears to have been carried out on a girl under 18 or where a girl discloses that she has undergone FGM.

The College's response to FGM will consider the government guidance, "Multi-agency statutory guidance on female genital mutilation" April 2016. Staff will also follow the established safeguarding procedure by reporting any such concerns to the Designated Safeguarding Lead and a report must also be made to the Police.

There will be a considered safeguarding response towards any girl who is identified as being at risk of FGM (e.g., there is a known history of practising FGM in her family, community, or country of origin) which may include sensitive conversations with the girl and her family, sharing information with professionals from other agencies and / or making a referral to Children's Social Care.

If the risk of harm is imminent there are several emergency measures that can be taken including police protection, an FGM protection order and an Emergency Protection Order.

Forced Marriage

Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered 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). Nevertheless, some perpetrators use perceived cultural practices to coerce a person into marriage.

School and college staff can contact the Forced Marriage Unit if they need advice or information: Contact: 020 7008 0151 or email fmu@fcdo.gov.uk.

In addition, since February 2023 it has also been a crime to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday, even if violence, threats, or another form of coercion are not used. As with the existing forced marriage law, this applies to non-binding, unofficial 'marriages' as well as legal marriages.

APPENDIX C: Children potentially at greater risk of harm

Our College recognises that children who experience adverse childhood experiences (ACEs) may find it difficult to develop a sense of self-worth and view the world in a positive way. For such children, college may be one of the few stable, secure, and predictable components of their lives. Other children may be vulnerable because, for instance, they have a disability, are in care, or are experiencing some form of neglect. We recognise that there are some children who are at a greater risk of harm due to adverse childhood experiences or trauma. Homefield seeks to remove any barriers that may exist in being able to recognise abuse or neglect in students experiencing special educational needs or disability.

Additional barriers can include:

- Assumptions that the indicators of abuse such as behaviour and mood relate to the disability.
- Students being more prone to peer group isolation.
- Students being impacted by behaviours such as bullying without outwardly showing any signs.
- Communication barriers and difficulties overcoming these.

We will seek to identify children who may be more vulnerable to further harm and seek to provide such children with the necessary support and to build their self-esteem and confidence.

There is a designated lead member of staff who is responsible for children who are looked after or who are care leavers.

Mental Wellbeing

The College recognises the role that we can play in supporting the mental health and wellbeing of our students. We recognise the importance of ensuring that staff can recognise the indicators of poor mental health and can raise their concerns to ensure that extra and appropriate support is put into place where it is needed.

APPENDIX D: Child-on-Child / Peer-on-Peer Abuse and Misogyny

The college maintains an absolute zero-tolerance policy toward **misogyny, misogynistic attitudes, and gender-based discrimination**. These behaviours are recognized as root-cause safeguarding risks that drive sexual harassment and sexual violence. They will never be dismissed or minimized as "banter" or "harmless joking."

The College recognises that misogyny and gender-based prejudice can contribute to harmful sexual behaviour, sexual harassment, coercion and abuse. Such behaviour will be challenged and addressed through safeguarding, behaviour management and educational interventions.

We recognise that children can abuse other children at any age (often referred to as child-on-child abuse. It can happen both in and out of college or online. Staff will remain vigilant to the signs of child-on-child / peer-on-peer abuse. The College recognises that such incidents or allegations must be referred on for appropriate support and intervention. Such abuse will not be tolerated or passed off as “banter” or “part of growing up”. This abuse could include harmful sexual behaviour, sexual violence, sexual harassment, assaults, upskirting, initiation or hazing-type violence, all forms of bullying, the sharing of self-generated intimate images and physical violence.

It is however recognised that girls are more likely to be the victims and boys the perpetrators. Some students may be more at risk of harm from specific issues such as sexual violence, homophobic, biphobic, or transphobic bullying or racial discrimination. We will take action to create a culture of support to ensure that those who are more vulnerable are able to bring forward concerns to trusted staff about their experiences. There are separate College and Local Authority safeguarding guidance and policies to address these concerns including the:

- College Behaviour policy
- Anti-bullying policy,
- E-safety Policy and
- “Guidance for schools working with children who display sexually abusive behaviour” (Leicestershire LA Guidance). (https://llrscb.proceduresonline.com/p_sexually_harm_behav.html)
- Students are to be provided with details of the Lucy Faithfull Foundations Shore Space - https://www.lucyfaithfull.org.uk/shore/ This offers a confidential chat service for students who are concerned about their own or someone else's sexual thoughts and behaviours.

In addition, there is the DfE guidance “Sexual violence and sexual harassment between children in schools and colleges” in Part 5 of “Keeping children safe in education”.
Harmful Sexual Behaviour (HSB), sexual harassment and sexual violence.

Relevant staff will liaise with the police, social care, and parents as appropriate. Support will be offered to both the alleged victim and those accused. Where appropriate, parents / carers will be involved in discussions about the format that this support will take.

Where an incident has occurred or specific risks are identified, a risk assessment will be undertaken to ensure the safety of all staff and students and minimise the risk of further harm.

The following steps will be taken to minimise the risk of child- on- child abuse:

- Staff training to ensure an understanding of what it is and how to recognise signs.
- Promotion of a supportive environment by teaching about acceptable and unacceptable behaviours (including online) throughout the curriculum.
- Clear procedures put in place to govern the use of mobile phones in college.
- Appropriate staff supervision of students and identifying locations around the sites that are less visible and may present more risk to others.

APPENDIX E: **Harmful Sexual Behaviour (HSB), sexual harassment and sexual violence.**

Sexual violence refers to offences under the Sexual Offences Act 2003 including rape, assault by penetration and sexual assault.

Sexual harassment is 'unwanted conduct of a sexual nature' that can occur online and offline. It is likely to violate a child's dignity, make them feel intimidated, degraded, or humiliated and create a hostile, offensive, or sexualised environment.

Sexual harassment can include:

- Sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance, and calling someone sexualised names.
- Sexual "jokes" or taunting.
- Physical behaviour, such as: deliberately brushing against someone, interfering with someone's clothes, and displaying pictures, photos, or drawings of a sexual nature.
- Online sexual harassment - 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 and sexual exploitation, coercion, and threats.
- 'Upskirting' is a criminal offence (Under the Voyeurism (Offences) Act 2019) 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.

Harmful Sexual Behaviour (HSB), sexual harassment and sexual violence exist on a continuum and may overlap; they can be both physical and verbal, and are never acceptable. It is important that all victims are taken seriously and offered appropriate support. Staff should be aware that some groups are potentially more at risk. Evidence shows girls, children with SEND and LGBTQ+ children are at greater risk.

Staff should be aware of the importance of:

- Making clear that Harmful Sexual Behaviour (HSB), sexual harassment and sexual violence.

- 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”.
- Challenging behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, flicking bras, and lifting skirts. Dismissing or tolerating such behaviours risks normalising them.

All cases of Harmful Sexual Behaviour (HSB), sexual harassment and sexual violence. should be reported to a Safeguarding Officer immediately.

APPENDIX F: Responding to reports of Harmful Sexual Behaviour (HSB), sexual harassment and sexual violence.

Children making a report of Harmful Sexual Behaviour (HSB), sexual harassment and sexual violence will be taken seriously, kept safe and be well supported.

If the report includes an online element staff will be mindful of the Searching, Screening and Confiscation: advice for schools (DfE 2018) guidance.

- Staff taking the report will inform the DSL or their Deputy as soon as practicably possible but at least within 24 hours.
- Staff taking a report will never promise confidentiality.
- Parents or carers will normally be informed (unless this would put the child at greater risk).
- If a child is at risk of harm, is in immediate danger, or has been harmed, a referral will be made to Children’s Social Care.

Risk Assessment:

Following a report, the DSL will make an immediate risk and needs assessment on a case-by-case basis. The Risk assessment will consider:

- The victim, especially their protection and support.
- The alleged perpetrator, their support needs, and any discipline action.
- All other children at the college.
- The victim and the alleged perpetrator sharing classes and space at college. The risk assessment will be recorded and kept under review. Where there has been other professional intervention and/or other specialist risk assessments, these professional assessments will be used to inform the College’s approach to supporting and protecting students.

Action: The DSL will consider:

- The wishes of the victim.

- The nature of the incident including whether a crime has been committed and the harm caused.
- Ages of the children involved.
- Developmental stages of the children.
- Any power imbalance between the children.
- Any previous incidents.
- Ongoing risks.
- Other related issues or wider context.

Options: The DSL will manage the report with the following options:

- Manage internally.
- Early Help / Family Help.
- Refer to Children's Social Care.
- Report to the Police where a criminal offence may have been committed.

Ongoing Response:

- The DSL will manage each report on a case-by-case basis and will keep the risk assessment under review.
- Where there is a criminal investigation into a rape, assault by penetration or sexual assault, the alleged perpetrator should be removed from any classes they share with the victim.
- The DSL will consider how best to keep the victim and perpetrator a reasonable distance apart on college premises and during college transport arrangements where relevant.

Where a criminal investigation into a rape or assault by penetration leads to a conviction or caution, the College will take suitable action. In all but the most exceptional of circumstances, the rape or assault is likely to constitute a serious breach of discipline and lead to the view that allowing the perpetrator to remain in the College would seriously harm the education or welfare of the victim (and potentially other students).

- Where a criminal investigation into sexual assault leads to a conviction or caution, the College will, if it has not already, consider any suitable sanctions considering their behaviour policy, including consideration of permanent exclusion. Where the perpetrator is going to remain at the College, the principle would be to continue keeping the victim and perpetrator in separate classes and continue to consider the most appropriate way to manage potential contact on college premises and transport. The nature of the conviction or caution and wishes of the victim will be especially important in determining how to proceed in such cases.
- The victim, alleged perpetrator, and other witnesses (children and adults) will receive appropriate support and safeguards on a case-by-case basis.
- The College will take any disciplinary action against the alleged perpetrator in line with behaviour and discipline in college.

- The College recognises that taking disciplinary action and providing appropriate support are not mutually exclusive actions and will occur at the same time if necessary.

Physical Abuse

While a clear focus of child-on-child / peer-on-peer abuse is around sexual abuse and harassment, physical assaults and initiation violence and rituals from students to students can also be abusive. These are equally not tolerated and if it is believed that a crime has been committed, will be reported to the police. The principles from the behaviour policy will be applied in these cases, with recognition that any police investigation will need to take priority.

APPENDIX G: Sexual violence, Serious Violence & County Lines

Sharing of sexual imagery by children

The College will always respond where children have been involved in the consensual or non-consensual sharing of self-generated intimate images and/or videos.

The College recognises the safeguarding risks associated with artificial intelligence (AI), including AI-generated intimate images ("deepfakes"), manipulated imagery, voice cloning and other synthetic media. Reports involving AI-generated intimate images will be managed in the same way as other incidents involving the consensual or non-consensual sharing of self-generated intimate images.

The DfE guidance “Sharing nudes and semi-nudes: advice for education settings working with children and young people” (Dec 2020) will be used to guide the College’s response on a case-by-case basis.

The key points being for staff being:

- Inform the DSL as soon as possible.
- Support the victim as appropriate and in accordance with their best interests.
- **Never view**, copy, print, share, store or save the imagery, or ask a child to share or download – **this is illegal**.
- If you have already viewed the imagery by accident (e.g., if a young person has showed it to you before you could ask them not to), report this to the DSL (or equivalent) and seek support.
- Do not ask the young person(s) who are involved in the incident to disclose information regarding the imagery. This is the responsibility of the DSL (or equivalent).
- Do not share information about the incident with other members of staff, the young person(s) it involves or their, or other, parents and/or carers.
- Do not say or do anything to blame or shame any young people involved.
- Do explain to them that you need to report it and reassure them that they will receive support and help from the DSL (or equivalent).

The key points for the DSL being:

- Refer to social care if:
    - The victim is a child and perpetrator an adult.

- The young person has been coerced or there are concerns about the capacity to consent.
- There are indications that the content depicts sexual acts or violence.
- There is immediate risk of harm including suicide / self-harming.

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. Staff should report any concerns about a child carrying or using a weapon (or expressing intent to do so) to the DSL or Deputy, who will assess the risk to both the individual concerned and others in the college.

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/418131/Preventing_youth_violence_and_gang_involvement_v3_March2015.pdf

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/741194/HOCountyLinesGuidanceSept2018.pdf

Child Sexual Exploitation CSE and Child Criminal Exploitation (CCE)

Child Sexual Exploitation (CSE) and **Child Criminal Exploitation (CCE)** are forms of abuse and both occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal activity.

Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources. In some cases, the abuse will be in exchange for something the victim needs or wants and/or will be to the financial benefit or other advantage (such as increased status) of the perpetrator or facilitator.

CSE and CCE can affect both males and females and can include children who have been moved (trafficked) for the purpose of exploitation. The abuse can be perpetrated by individuals or groups, males or females, and children or adults. The abuse can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence. Victims can be exploited even when activity appears consensual and it should be noted - exploitation, as well as being physical, can be facilitated and/or take place online. CSE can include 16- and 17-year-olds who can legally consent to sex, but they may not realise they are being exploited e.g., they believe they are in a genuine romantic relationship. A significant number of children who are victims of sexual exploitation go missing from home, care and education at some point or are targeted by criminals involved in the illegal supply of drugs (County Lines) and serious violent crime.

‘County Lines’ involves drug networks or individuals exploiting children and young people into carrying drugs and money between cities, towns, and villages.

Serious violent crime can be associated with this form of criminal activity together with child sexual exploitation. Children may also be exploited into committing cybercrime or money laundering offences and organised criminal groups or individuals may exploit children and young people with enhanced computer skills to access digital networks and/or data for criminal and financial gain. Children with bank accounts may be persuaded to allow criminals to use their banking facilities to launder money.

CCE can also involve working in cannabis factories, shoplifting, or pickpocketing and may involve coercing children to commit vehicle crime or serious violence towards others. It is important to note that the experience of girls can be very different to that of boys, but girls are also at risk. Criminal exploitation of children is a form of harm that can affect children in both a physical environment and online.

County Lines

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs using dedicated mobile phone lines or other form of “deal line”. This activity can happen locally as well as across the UK - no specified distance of travel is required. Children and vulnerable adults are exploited to move, store, and sell drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children can be targeted and recruited into county lines in a number of locations including any type of colleges (including special colleges), further and higher educational institutions, pupil referral units, children’s homes, and care homes. Children are also increasingly being targeted and recruited online using social media. Children can easily become trapped by this type of exploitation as county lines gangs can manufacture drug debts which need to be worked off or threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

APPENDIX H: Children Missing from Education

Our College recognises the entitlement that all children have to education and will work closely with the Local Authority to share information about students who may be missing out on full time education or who go missing from education. A child missing from education, particularly those who have unexplained or persistent absences from education, can be a warning of safeguarding issues including neglect, criminal or sexual exploitation, FGM, radicalisation or forced marriage, or issues such as mental health problems and substance abuse.

The Local Authority will also be informed where children are to be removed from the College:

a. to be educated outside the college system.

b. for medical reasons.

c. because they have ceased to attend.

d. because they are in custody.

e. because they are no longer attending the College or their placement has ended.

Child sexual exploitation 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. A significant number of children who are victims of sexual exploitation go missing from home, care, and education at some point.

Staff training includes raising awareness of this issue and any concerns are passed to the Designated Safeguarding Lead who will make a risk assessment and refer to Local Authority First Response Children's Duty if appropriate.

So-called 'honour-based' violence (HBV) encompasses crimes which have been committed to protect or defend the honour of the family and / or the community, including Female Genital Mutilation (FGM) (see p.26), forced marriage, and practices such as breast ironing. All forms of so-called HBV are abuse (regardless of the motivation), and concerns will be passed to the Designated Safeguarding Lead for onward referral as required. Complaints or concerns raised by parents or students will be taken seriously and followed up in accordance with the College's complaints process.

APPENDIX I: Prevent Strategy

Our College recognises the duties placed on us by the Counter Terrorism Bill (July 2015) to prevent our students being drawn into terrorism.

The updated and strengthened CONTEST Strategy was launched in June 2018.

Prevent has been reviewed in Feb 2023 by William Shawcross and the conclusion is that it must return to its overarching objective: to stop individuals from becoming terrorists or supporting terrorism.

The aim of CONTEST is to reduce the risk to the UK and its citizens and interests overseas from terrorism, so that people can go about their lives freely and with confidence.

The CONTEST Strategy consists of the following four work stands:

1. **Prevent**: To stop people becoming terrorists or supporting terrorism.
2. **Pursue**: To stop terrorist attacks.
3. **Protect**: To strengthen our protection against a terrorist attack.
4. **Prepare**: To mitigate the impact of a terrorist attack.

The Prevent Strategy recognises that there is no socio-demographic profile of a terrorist in the UK, and no single pathway or 'conveyor belt', leading to terrorism.

The aim of Prevent is to safeguard and support those vulnerable to radicalisation, to stop them from becoming terrorists or supporting terrorism. The strategy also includes supporting the rehabilitation and disengagement of those already involved in terrorism. The full CONTEST Strategy, including an overview of Prevent, can be found at:

www.gov.uk/government/collections/contest

Our College is committed to actively promoting the fundamental British values of democracy, the rule of law, individual liberty and mutual respect and tolerance of those with different faiths and beliefs; the students are encouraged to develop and demonstrate skills and attitudes that will allow them to participate fully in and contribute positively to life in modern Britain.

There is a current threat from terrorism in the UK and this can include the exploitation of vulnerable young people, aiming to involve them in terrorism or to be active in supporting terrorism.

Our College seeks to protect children and young people against the messages of all violent extremism including, but not restricted to, those linked to Islamic Ideology, Far Right / Neo Nazi / White Supremacist ideology etc.

Prevent works best when delivered in partnership with communities as cohesive and empowered communities are better equipped to reject extremist ideologies. We will therefore continue to develop and grow our network of community groups delivering Prevent based initiatives across both the County and City. We will work in partnership with relevant agencies and organisations including those established by the regional Prevent Officer.

We will also conduct appropriate staff training and ensure appropriate online filtering. The College has a Prevent risk assessment and action plan which is updated annually.

What makes someone vulnerable to radicalisation?

- Low self-esteem
- Victimisation
- Guilt
- Loss
- Lack of trust
- Isolation
- Family breakdown
- Charismatic leader
- Lack of theological understanding
- Mental health problems
- Sense of worth
- Social exclusion
- Fear
- Lack of purpose
- Unemployment
- Political grievance
- Peer pressure
- Anger / desire for revenge

How our students are vulnerable:

- Easily manipulated.
- Trusting of others
- Led or befriended
- Unsupervised at times / independent use of the internet
- Limited understanding of consequences

Assessing the risk

Consider:

- **Engagement** – a person's susceptibilities, motivations, and influences.
- **Intent** – is the individual ready to use violence to promote their views?
- **Capability** – do they have the skills, resources, and networks to commit acts of terrorism?

How does radicalisation happen?

- Develops from a friendship.
- Attention may make them feel special.
- Threat of exclusion.
- Desire for self-belonging / worth.

Concerns of a Prevent nature should be referred to a member of the Safeguarding Team who will inform the DSL. Prevent and Channel referrals will be made as necessary. They will also consider whether circumstances require Police to be contacted.

APPENDIX J: Low-level Concerns Policy

1.0 Purpose

1.1 This policy sets out a framework whereby staff are expected to report concerns, no matter how small, about their own behaviour or that of another member of staff, volunteer, supply teacher, contractor or other person working in college. Its purpose is to help create and embed a culture of openness, trust, and transparency in which the clear values and expected behaviour set out in the "Guidance for safer working practice for those working with children and young people in education settings" (May 2019) (sometimes called the safeguarding code of conduct) are lived, monitored, and reinforced.

1.2 The policy should be read in conjunction with the current statutory guidance – "Keeping Children Safe in Education" Part 4, Section 2.

2.0 Who does the policy apply to?

2.1 This policy applies to all staff and other individuals who work or volunteer in college.

3.0 Definition of a low-level concern

3.1 A low-level concern is any concern, no matter how small, even if no more than causing a sense of unease or a 'nagging doubt', that a person working in or on behalf of the college may have acted in a way that:

- is inconsistent with the "Guidance for safer working practice" (May 2019), including inappropriate conduct outside of work, and
- does not meet the allegations threshold or is otherwise not considered serious enough to make a referral to the LADO.

4.0 Reporting low-level concerns

4.1 Where a low-level concern has been identified this will be reported as soon as possible to the principal. However, it is never too late to share a low-level concern if this has not already happened.

4.2 Where the principal is not available, the information will be reported to the Designated Safeguarding Lead or Deputy (i.e., the most senior member of SMT acting in this role).

4.3 Low-level concerns about the Designated Safeguarding Lead will be reported to the principal and those about the principal will be reported to the Chair of Trustees /

4.4 Where the low-level concern has been reported to the Designated Safeguarding Lead, they will inform the principal of the details as soon as possible.

5.0 Recording concerns

5.1 A summary of the low-level concern should be written down, signed, timed, dated and shared by the person bringing the information forward.

5.2 Where concerns are reported verbally to the principal a record of the conversation will be made by the principal which will be signed, timed, and dated.

6.0 Responding to low-level concerns

6.1 Where a low-level concern has been raised this will be taken seriously and dealt with promptly. The principal will:

- Speak to the person reporting the concern to gather all the relevant information.
- Speak to the individual about the concern raised to ascertain their response, unless advised not to do so by the LADO or Police (HR advice may also need to be taken).
- Where necessary further investigation will be carried out to gather all relevant information. This may involve speaking to any potential witnesses.

- The information reported and gathered will then be reviewed to determine whether the behaviour,
  - i) is consistent with the "Guidance for safer working practice for those working with children and young people in education settings" (May 2019): no further action will be required,
  - ii) constitutes a low-level concern: no further action is required, or additional training/guidance/support may be required to rectify the behaviour via normal day to day management processes. The employee should understand that failure to improve or a repeat of the behaviour may lead to further action being taken, e.g., either via the Performance Management Policy or Disciplinary Policy.
  - iii) is serious enough to consult with or refer to the LADO: a referral should be made to the LADO and advice taken from HR. In this case the college's Managing Allegations procedure within the Safeguarding Policy and Disciplinary Policy will be followed.
  - iv) when considered with any other low-level concerns that have previously been raised about the same individual, should be reclassified as an allegation and referred to the LADO or Police: a referral should be made to the LADO and advice taken from HR. In this case the college's Managing Allegations procedure within the Safeguarding Policy and Disciplinary Policy will be followed.
- Records will be made of:
  - i) all internal conversations including any relevant witnesses
  - ii) all external conversations e.g., with the LADO
  - iii) the decision and the rationale for it
  - iv) any action taken

7.0 Can the reporting person remain anonymous?

7.1 The person bringing forward the concern will be named in the written record. Where they request to remain, anonymous this will be respected as far as possible. However, there may be circumstances where this is not possible e.g., where a fair disciplinary investigation is needed or where a later criminal investigation is required.

8.0 Should staff report concerns about themselves (i.e., self-report)?

8.1 It may be the case that a person finds themselves in a situation which could be misinterpreted or might appear compromising to others; or they may have behaved in a manner which on reflection they consider falls below the standard set out in the "Guidance for safer working practice". In these circumstances they should self-report. This will enable a potentially difficult situation to be addressed at an early opportunity if necessary.

9.0 Where behaviour is consistent with the "Guidance for safer working practice" (May 2019)

9.1 Feedback will be given to both parties to explain why the behaviour was consistent with the "Guidance for safer working practice".

10.0 Should the low-level concerns file be reviewed?

10.1 The records will be reviewed periodically, and whenever a new low-level concern is added, so that potential patterns of concerning, problematic or inappropriate behaviour can be identified and referred to the LADO if required. A record of these reviews will be retained.

11.0 References

11.1 Low-level concerns will not be included in references unless a low-level concern, or group of concerns, has met the threshold for referral to the LADO and found to be substantiated.

12.0 What is the role of the Board of Trustees?

12.1 The Principal will regularly inform the Trustees about the implementation of the low-level concerns policy including any evidence of its effectiveness e.g., with relevant data. The Safeguarding Trustee may also review an anonymised sample to ensure that these concerns have been handled appropriately.

APPENDIX K: Useful Contacts

- Leicestershire multi-agency policy and procedure
  http://www.llradultsafeguarding.co.uk

- Warwickshire Safeguarding
  https://www.safeguardingwarwickshire.co.uk/

- **Service Manager - Safeguarding and Performance Service**
  Hayley Binley 01163057566 / 07538562293

  Local Authority Allegations Manager LADO
  Kim Taylor / Lovona Brown/Shellie Miskella 0116 305 4141

- **First Response Children's Duty (Tier 4 Same-day referrals)**
  Telephone 0116 3050005
  Email childrensduty@leics.gov.uk
  Address First Response Children's Duty
  Room 100b
  County Hall
  Championship Way
  Glenfield
  LE3 8RF

- **All other referrals including Early Help (Children & Family Wellbeing) Service**
  http://lrsb.org.uk/childreport

- Early Help queries and Consultation Line
  0116 3058727.

NEW SECTION: APPENDIX L – Guidance for Gender-Questioning Children

Homefield College is committed to supporting all students in a safe, respectful and inclusive manner. The welfare, safeguarding and best interests of the student will always be paramount.

The College recognises that students who are questioning their gender may experience vulnerability, anxiety, bullying, harassment, social isolation or mental health difficulties.

Concerns relating to the welfare of a gender-questioning student will be managed through normal safeguarding procedures and risk assessment processes.

Requests relating to names, pronouns, social presentation, participation in activities or the use of facilities will be considered individually, taking account of:

• safeguarding and welfare considerations;

• the views, wishes and feelings of the student;

• the student's age, understanding and capacity;

• Equality Act 2010 duties;

• mental health and wellbeing;

• the rights and needs of other students;

• advice from relevant professionals where appropriate.

The College will normally seek to work openly and collaboratively with parents and carers where this is appropriate and in the student's best interests.

Where involving parents or carers may place a student at risk of significant harm, advice will be sought from safeguarding agencies and decisions will be recorded by the Designated Safeguarding Lead.

Students will be supported through tutorial, pastoral, therapeutic and safeguarding processes according to their individual needs.

Relevant Documents

Associated College Policies, procedures and guidance and other related documents.

- Role description for the designated safeguarding lead
- Anti-Bullying Policy (students)
- Online Safety Policy
- ICT Acceptable Use Policy
- Harassment and Bullying Policy
- Recruitment and Induction of Staff Policy
- Whistleblowing Policy
- Homefield Staff Code of Conduct
- Disciplinary Policy (staff and students)
- Health and Safety Policy
- Medication Policy
- Wellbeing strategy
- Prevent Risk Assessment and action plan

Homefield Designated Safeguarding Lead Team

Designated Safeguarding Lead

Tracey Forman

Deputy Safeguarding Lead Team

Emma Graham

Gemma Starbuck

Rebekah Rogers

Jeni Jacques

Designated Safeguarding Line: 01509 320 336