



# **CCG Safeguarding Students, Apprentices, Higher Education and Adults at Risk**

(Child Protection, e-Safety and Prevent)

## Table of Contents

<b>1</b>	<b>Introduction .....</b>	<b>2</b>
<b>2</b>	<b>Scope of this policy .....</b>	<b>4</b>
<b>3</b>	<b>Statutory responsibilities and background.....</b>	<b>5</b>
<b>4</b>	<b>Definitions of abuse .....</b>	<b>7</b>
<b>5</b>	<b>Disclosures .....</b>	<b>12</b>
<b>6</b>	<b>Procedure for dealing with 14-16 students .....</b>	<b>16</b>
<b>7</b>	<b>Prevent .....</b>	<b>17</b>
<b>8</b>	<b>Allegations against staff .....</b>	<b>18</b>
<b>9</b>	<b>Allegations about employers.....</b>	<b>20</b>
<b>10</b>	<b>Designated staff with responsibility for safeguarding .....</b>	<b>21</b>
<b>11</b>	<b>Designated Safeguarding Teams for CCG.....</b>	<b>23</b>
<b>12</b>	<b>Designated Governor .....</b>	<b>24</b>
<b>13</b>	<b>Training .....</b>	<b>25</b>
<b>14</b>	<b>Confidentiality .....</b>	<b>26</b>
<b>15</b>	<b>Safer recruitment .....</b>	<b>26</b>
<b>16</b>	<b>Communication .....</b>	<b>26</b>
<b>17</b>	<b>Status of this policy .....</b>	<b>27</b>
	<b>Annex 1 - Keeping Children Safe in Education (KCSiE) - Translations .....</b>	<b>28</b>
	<b>Annex 2 - Definitions .....</b>	<b>29</b>
	<b>Annex 3 - Chichester College Group approach to address sexual harassment and online sexual abuse .....</b>	<b>30</b>
	<b>Annex 4 - Information on recognising abuse .....</b>	<b>32</b>
	<b>What is physical abuse? .....</b>	<b>33</b>
	<b>What is sexual abuse? .....</b>	<b>34</b>
	<b>What is emotional abuse?.....</b>	<b>35</b>
	<b>Annex 5 - Recognition of technology in Safeguarding.....</b>	<b>37</b>
	<b>Annex 6 - Resources.....</b>	<b>38</b>



## 1 Introduction

1.1 Chichester College Group (the Group) is committed to protecting all our students, apprentices and adults at risk. The fundamental principles of this policy are based on legislation and also a moral duty to safeguard the welfare of students, apprentices and adults at risk receiving education, training and care at the Group, including off-site students/adults at risk, those on placement/apprenticeship, excursions or trips. This policy primarily deals with the protection of students and adults at risk. Any updates will be embedded and disseminated appropriately

1.2 Through this policy the Group aims to:

- Minimise the risks to health and well-being of students, apprentices and adults at risk
- Promote safe practices and challenge poor and unsafe practice
- Identify instances in which there are grounds for concern about students and adults at risk's welfare and take action to keep them safe
- Enable students, apprentices and adults at risk to raise concerns relating to safety and for those concerns to be actioned
- Take appropriate action to prevent unsuitable people working with our students and adults at risk
- Ensure staff receive adequate training and supervision in relation to Child Protection, Safeguarding, e-Safety and Prevent

1.3 In pursuit of these aims, the Group Leadership Team (GLT) will approve and annually review policies and procedures with the aim of:

- Raising awareness of issues relating to the welfare and the promotion of a safe environment for the students and adults at risk learning
- Aiding the identification of students and adults at risk of significant harm and providing procedures for reporting concerns
- Establishing procedures for reporting and dealing with allegations of abuse against a member of staff



- 1.4 Safeguarding students, apprentices and adults at risk covers more than Child Protection. Issues including Child Sexual Exploitation (CSE), child on child abuse, health and safety, online safety, including filtering and monitoring on college devices and networks, radicalised behaviour, Young Carers, mental health, and wellbeing, dealing with bullying, sexual harassment (see Annex 3), arrangements to meet the needs of students with medical conditions, providing first aid and other such requirements, must be considered when working with students. There are separate policies which must be read in conjunction with this policy (para 2.4).



## 2 Scope of this policy

- 2.1 This policy applies primarily to students, apprentices and adults at risk (those under the age of 18 in our care or 25 if considered at risk; for example, students with disabilities and/or learning disabilities and those with mental health concerns) and applies, with appropriate adaptations, to allegations of abuse and the protection of adults at risk.
- 2.2 The safer recruitment aspects of this policy relate to all staff, volunteers and Agency workers. Procedures are also in place with sub-contractors, partners and host families.
- 2.3 All staff must read and understand Keeping Children Safe in Education 2024 part 1. This is a statutory guidance from the Department for Education.

[Keeping children safe in education 2024 \(publishing.service.gov.uk\)](https://publishing.service.gov.uk)

- 2.4 This policy should be read in conjunction with the following:
- Personal Relationships Policy
  - Health & Safety Policy
  - Care, Support and Medicines Policy
  - Recruitment and Selection Policy
  - Grievance (inc. Bullying & Harassment) Policy
  - The Staff Code of Conduct and the 'Professional boundaries for staff' accompanying guidance
  - Student Anti-bullying Policy
  - IT Security Policy
  - Acceptable Use Policy
  - Freedom of Speech and Guest Speaker Policy
  - Data Protection Policy
  - Whistleblowing Policy & Procedure
  - Positive Behaviour Management (including fitness to study)
  - First Steps Childcare Child Protection Policy
- 2.5 Policy changes will be disseminated via the Group's Management Teams.
- 2.6 This policy will be used objectively and free from discrimination, in accordance with the Group's Equity, Diversity and Inclusion Policy, the Recruitment and Selection Policy and the Disciplinary Policy and Procedure.



### **3 Statutory responsibilities and background**

- 3.1 The Children's Act 2014, which is fundamental to people working with children and young people in the UK.
- 3.2 The Education Act 2002 requires that governing bodies of FE providers have a statutory duty to make arrangements to safeguard and promote the welfare of students and adults at risk.
- 3.3 The Sexual Offences Act 2003 makes it an offence for a person over 18 (e.g., a member of staff) to have a sexual relationship with a child under 18 where that 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 she/he does not teach the child.
- 3.4 The Group takes account of guidance issued by the Department for Education, the Disclosure and Barring Service and other relevant bodies and groups.
- 3.5 The Safeguarding Vulnerable Groups Act 2006 which sets out the type of activity in relation to students and adults at risk for which employers and individuals will be subject.
- 3.6 The Protection of Freedoms Act 2012 which changed the definition of Regulated Activity including who is eligible for a barred check list.
- 3.7 Keeping Children Safe in Education 2024 and Working Together to Safeguard Children 2023. This is statutory guidance from the Department for Education. Schools and colleges must have regard to it when carrying out their duties to safeguard and promote the welfare of children.
- 3.8 The Equality Act 2010 is significant to safeguarding around unlawfully discriminating against students because of their protected characteristics, how to support those with protected characteristics and where proportional dealing with the disadvantages these students face.



- 3.9 FGM Act 2003 Section 5B of this Act introduces a mandatory reporting duty, which requires regulated health and social care professionals and teachers in England and Wales to report “known” cases of FGM in under 18s which they identify in the course of their professional work to the police. The Duty came into force on 31st October 2015. Sexual violence and sexual harassment between children in schools and colleges (2018). This guidance highlights the advice to prevent and deal with sexual violence and sexual harassment between students.
- 3.10 The College will notify General Enquiries at Education and Skills Funding Agency - GOV.UK ([www.gov.uk](http://www.gov.uk)) where a referral has been made by the College or one of the College Related Parties in either of the following circumstances (such notification must include the name of the institution, a high level summary of the nature of the incident (without sharing personal information about victims or alleged perpetrators) and confirmation of whether it is, or is scheduled to be, investigated by the Local Authority and/or the police):
- a safeguarding concern related to sexual violence to Local Authority children’s social care/adult social care and/or the police, or
  - an allegation of abuse made against a teacher, lecturer or other member of staff to the designated officer(s) (at the local authority).
  - The Group’s Safeguarding Lead will provide this information
- 3.11 The Group is committed to working with and assisting the local children’s departments regarding child protection matters and is committed to liaison with the Local Safeguarding Children’s Board (LSCB) and Local Authority Designated Officer (LADO).
- 3.12 In the event of a sudden death of a student or adult at risk, the Group has its own policy statement and procedures which provides clear lines of responsibility to ensure the correct notification and dissemination of information occurs.
- 3.13 The Group is working in partnership with Community Safety and Prevent teams across Sussex to deliver the Prevent strategy which covers all forms of extremism and focuses to prevent radicalisation on three key objectives:
- Challenging ideology that supports terrorism
  - Protecting vulnerable individuals
  - Supporting sectors and institutions where there is a risk of radicalisation



## 4 Definitions of abuse

4.1 In respect of this policy, the Group recognises the following as definitions of abuse:

- **Bullying:** Bullying is the repetitive, intentional hurting of one person or group by another person or group, where the relationship involves an imbalance of power
- **Physical abuse:** Physical abuse causes harm. It may involve hitting, shaking, throwing, poisoning, burning, scalding, drowning or suffocating. It may be done deliberately or recklessly or be the result of a deliberate failure to prevent injury occurring. Physical abuse can also be when a parent, guardian or carer fabricates symptoms or induces illness in a student
- **Neglect:** Neglect is the persistent or severe failure to meet a student's or adult at risk's basic physical and/or psychological needs. It will result in serious impairment of the student's and/or adults at risk's health or development
- **Sexual abuse:** Sexual abuse involves a student or adult at risk being forced or coerced into participating in or watching sexual activity. It is not necessary for the student or adult at risk to be aware that the activity is sexual and the apparent consent of the student or adult at risk is irrelevant. It also relates to sexual abuse in terms of e-safety and child sexual exploitation, such as inappropriate images, film and evidence of grooming
- **Non-contact abuse:** Non-contact abuse is when abusive acts do not involve actual physical contact, i.e., pornographic or violent films, sexual acts performed in front of the victim, violent acts with the abused present
- **Emotional abuse:** Emotional abuse occurs when there is persistent emotional ill treatment or rejection. It causes severe and adverse effects on the student or adult at risk's behaviour and emotional development, resulting in low self-worth. Some level of emotional abuse is present in all forms of abuse



- **Financial abuse:** Financial abuse is the misuse of a person's funds and assets; obtaining property and funds without his/her knowledge and full consent, or in the case of an elderly person who is not competent, not in his/her best interests. This is also known as material abuse. Financial or material abuse can involve the theft or misuse of a person's money or property
- **Radicalisation and extremism:** Radicalisation refer to the process of supporting terrorism and extremist ideologies and, in some cases, to then participate in terrorist activity. Extremism is defined as vocal or active opposition to fundamental British values including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs
- **Terrorism:** Terrorism is an action that endangers or causes serious violence to a person/people, causes serious damage to property or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for advancing a political, religious or ideological cause
- **Discriminatory abuse:** Discriminatory abuse is motivated by oppressive and discriminatory attitudes. Examples of discriminatory abuse may include:
  - disability - physical or learning disability, mental, ill-health or sensory impairment
  - race
  - gender
  - age
  - religion
  - cultural background
  - sexual orientation
  - political convictions
  - appearance
- **Grooming:** Grooming is when someone builds an emotional connection with a child to gain their trust for the purposes of sexual abuse, sexual exploitation or trafficking. Children and young people can be groomed online or face-to-face, by a stranger or by someone they know - for example a family member, friend or professional





- **Child Sexual Exploitation (CSE) and Child Crime Exploitation (CCE):** Both Child Sexual Exploitation and Child Crime Exploitation are forms of abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual or criminal activity. Individuals or groups, male or females, children or adults can carry out this abuse. It can be a one-off occurrence or over a long period. County Lines - Criminal exploitation is a geographically widespread form of harm, that is a typical feature of County Lines criminal activity; drug networks or gangs groom children and young people to carry drugs and money from urban areas to suburban and rural areas.
- **Cyber-bullying:** Cyber-bullying is bullying that takes place over digital devices like mobile phones, computers, and tablets. Cyber-bullying can occur through SMS, text, and apps, or online in social media, forums, or gaming where people can view, participate in, or share content. Cyberbullying includes sending, posting, or sharing negative, harmful, false, or mean content about someone else. It can include sharing personal or private information about someone else causing embarrassment or humiliation. Some cyber-bullying crosses the line into unlawful or criminal behaviour
- **Forced Marriage:** Forced marriage is where one or both people do not consent to the marriage and pressure, or abuse is used. Pressure can include threats, physical or sexual violence, and financial pressure. All child marriages are forced, because a child cannot provide informed consent, and is therefore a violation of children's rights
- **Female Genital Mutilation (FGM):** Female Genital Mutilation (FGM) is a human rights violation, torture and an extreme form of violence and discrimination against girls and women. It is most often carried out on girls between infancy and age 15, though adult women are occasionally subjected
- **Significant Harm:** Some children may be in need because they are suffering or likely to suffer significant harm. The Children Act introduced the concept of significant harm as the threshold that justifies compulsory intervention in family life in the best interest of the children



- **Child on Child Sexual Violence and Sexual Harassment:** further guidance has been published in the sexual violence and sexual harassment between children in schools and colleges (May 2018). The referral process is as per any safeguarding concern, but the Group must act swiftly and ensure a risk assessment is carried out. The risk assessment must consider:
  - The victim
  - The alleged perpetrator
  - All other children and, if appropriate, other adults, children and staff
- **Children Missing in Education:** Children missing in education is often an indicator for other potential safeguarding concerns. The Group should have measures, though its attendance reporting and follow up procedures, to ensure it is following up on students, who could potentially be “missing in education”. This can be a warning sign of a range of safeguarding concerns, including sexual abuse, sexual exploitation or child criminal exploitation
- **Domestic Abuse:** Any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender of sexuality. The Police are committed to tackling crime and disorder and supporting public protection across Sussex and work on a regular basis with education establishments. The Group is signed up to this initiative, which is called Operation Encompass. It is a joint-agency process which provides early intervention, appropriate support for students and adults at risk who have been involved in or exposed to domestic abuse. Domestic abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional. Children can be victims of domestic abuse. The impact on children through seeing, hearing or experiencing the effects of domestic abuse and/or experiencing it through their own intimate relationships



- **Child on Child Abuse:** This can include, but is not limited to bullying (including cyberbullying), sexual violence and sexual harassment, physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm; sexting and initiating/hazing type violence and rituals between students; sexual violence such as rape, assault by penetration and sexual assault; sexual harassment such as sexual comments, remarks, jokes and online sexual harassment which may be stand-alone or part of a broader pattern of abuse. The Department of Education have published advice for governing bodies, proprietors, headteachers, principals, senior leadership teams and designated safeguarding leads in the document: Sexual violence and sexual harassment between children in schools and colleges. (September 2021)
- **Up skirting:** The Voyeurism (offences) Act, which is commonly known as the Up-skirting Act, came into force on the 12th of April 2019. Upskirting 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
- **Homelessness:** Being homeless or being at risk of becoming homeless presents a real risk to a student's welfare. The DSL, and any deputies, should be aware of contact details and referral routes into the Local Housing Authority so they can raise/progress concerns at the earliest opportunity
- **Fabricated or Induced Illness:** (FII) is a form of abuse associated with a range of poor outcomes for children and young people extending to the serious harm or even death of the child. Behaviours by a parent or carer may result in harm to a child or young person. FII can occur when a child or young person also has a confirmed diagnosis of illness or disability and the two may coexist, but the health seeking behaviour or presentation is outside that expected for the condition or disability." - NHS
- **Honour based abuse:** This can be a form of abuse that may be linked to certain practices that are related to culture, faith, beliefs, and that may put young people at the risk of abuse



- **Serious Violence:** There are indicators, which may signal that a child is at risk from or involved with serious violent crime. These may include increased absence from school, 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, signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate children have been approached by, or are involved with, individuals associated with criminal networks or guns. All staff should be aware of the associated risks and understand the measure in place to manage these. Advice is provided in the Home Office's Preventing Youth Violence and Gang Involvement and Criminal Exploitation of Children and Vulnerable Adults: County Lines Guidance

## 5 Disclosures

5.1 Where a member of staff suspects that a student, apprentice or adult at risk is being abused, they must:

- Allow the individual to speak without interruption
- Never trivialise or exaggerate the issue
- Never make suggestions
- Not coach or lead in any way
- Reassure the individual and let them know they were right to report the matter
- Always ask enough questions to clarify understanding but not probe or interrogate
- Be honest - the staff member should let the individual know that it cannot be kept a secret and someone else will need to be told.
- Try to remain calm, remembering that this is not an easy thing for them to do
- Not show emotions - to show anger, disgust or disbelief may stop the individual talking. This may be because the individual feels they are upsetting the staff member or feel the staff member's negative feelings are directed towards them
- Let the individual know they are taking the matter very seriously.
- Make them feel secure and safe without causing them any further anxiety
- Make a written record as soon as it is practically possible of what has happened



- If the member of staff believes the concern needs immediate attention, they should contact the duty Safeguarding Officer (contact details in 5.10).
- 5.2 The member of staff must submit the referral/concern through Safeguard
- 5.3 If the concern is non-urgent, the member of staff needs to record the concern through Safeguard to enable concerns to be logged
- 5.4 The concern must be factual and not contain the staff member's opinions or analysis. Terms such as "I think..." and "In my opinion...." must be avoided
- 5.5 The member of staff will receive an automated email via Safeguard to confirm receipt
- 5.6 The Safeguarding Officer can advise and provide support to the member of staff; the Counselling Team is also available
- 5.7 The Designated Safeguarding Officers:
- Will know how to make an appropriate referral
  - Will be available to provide advice and support to other staff on issues relating to Child Protection, Safeguarding, e-Safety and Prevent
  - Have responsibility to be available to listen to students and adults at risk who are studying at the Group
  - Will deal with individual cases, including attending case conferences and review meetings, as appropriate
  - Have received training in child protection issues and inter-agency working, as required by the LSCB, and will receive refresher training at least every two years
- 5.8 In the event the Designated Safeguarding Officers are unavailable, the Director of Safeguarding or Executive Principal should be contacted
- 5.9 All staff and governors are responsible for complying with this policy, reporting incidents and co-operating with any investigations or incidents in line with procedures



5.10 There is a Safeguarding Officer rota at all sites; to contact the on-duty Officer at:

**Chichester:**

Staff: extension 5555

Students: 01243-786321 ext 5555

Staff & students:

[StaySafe@chichester.ac.uk](mailto:StaySafe@chichester.ac.uk)

**Crawley:**

Staff: extension 2275

Students: 01293-442275

Staff & students:

[safe@crawley.ac.uk](mailto:safe@crawley.ac.uk)

**Worthing:**

Staff: extension 400

Students: 01903-275755 ext 400

Staff & students:

[StaySafe@worthing.ac.uk](mailto:StaySafe@worthing.ac.uk)

**Haywards Heath:**

Staff: extension 3900

Students 01444 711900 ext. 3900

Staff & Students:

[StaySafeHaywards@chichester.ac.uk](mailto:StaySafeHaywards@chichester.ac.uk)

**Brinsbury:**

Staff: extension 5555

Students: 01243-786321 ext. 1022

Staff and students:

[StaySafeBrinsbury@chichester.ac.uk](mailto:StaySafeBrinsbury@chichester.ac.uk)

**Northbrook:**

Staff: 07515 329089

Students and staff: 07515 329089

Students and staff:

[staysafeNorthbrook@gbmc.ac.uk](mailto:staysafeNorthbrook@gbmc.ac.uk)

**Brighton MET:**

Staff: 07739 615 265,  
07980 973 224

Students and staff: 07739 615 265

Students and staff:

[safeguardingmet@gbmc.ac.uk](mailto:safeguardingmet@gbmc.ac.uk)



- 5.11 Supervision of the Safeguarding Officers will be provided through the Group's Counselling Service or via an external provider.
- 5.12 A Safeguarding and Prevent Board meets termly to oversee the wider responsibilities of the Safeguarding Policy and Procedure, review statutory guidance and 'live' cases; where appropriate, a case review will be undertaken to learn and share practice.
- 5.13 The aim of the Safeguarding and Prevent Board is to:
- Ensure the Group provides the highest quality care for all students, with enhanced arrangements, and adults at risk
  - Minimise the risk of harm to our students and adults at risk
  - Address concerns about the welfare of our students and adults at risk
  - Identify and respond to students and adults at risk who may be suffering significant harm and take appropriate actions
  - Meet its legal requirements relating to safeguarding issues
- 5.14 The Safeguarding Teams meet weekly to discuss relevant cases and share practice at each campus. Where appropriate, and where a potential risk of harm has been identified, they will create and implement safeguarding safety plans and risk assessments, making reasonable adjustments, as appropriate to enable students and adults at risk to access learning opportunities; this will be in liaison with identified members of the Curriculum and support teams. The meetings are chaired and monitored by the relevant Safeguarding Manager
- 5.15 Informally, members of the safeguarding team work together on a daily basis to discuss cases. Further to this there is a formalised meeting structure:
- Regular meetings with the Safeguarding teams to formally discuss the safety of individuals as a serious case review on each site
  - Two meetings per half term with the Director of Safeguarding and the Safeguarding Managers to review organisational safeguarding and prevent and consider serious cases
  - Termly safeguarding and prevent updates to the Group Leadership Team
  - Termly safeguarding and prevent risk assessment updates with risk register review
  - Termly CCG safeguarding reports presented at the Safeguarding and Prevent Board and at Governors





- Half termly meeting between the Safeguarding Governor and Safeguarding Director to ensure there are effective systems in place and to discuss any strategic issues/concerns
- Monthly meetings between Safeguarding Manager, Pastoral Support Manager and SEND Manager to share information relating to students at risk, and any issues/concerns
- Monthly meetings between Safeguarding Manager and Apprenticeship Manager to share information relating to students at risk and any concerns/issues relating to the workplace and/or college
- Monthly meetings between Safeguarding Manager and Teaching & Learning Managers to share information relating to students at risk and any issues/concerns
- Weekly meetings between Safeguarding Manager and Principal to discuss serious issues/concerns
- Monthly meetings with Safeguarding Director and HR Director to review and monitor staff low level concerns and allegations

## **6 Procedure for dealing with 14-16 students**

- 6.1 The overall responsibility for the safeguarding of 14-16 students remains with the referring school or authority. This does not, however, negate the responsibility placed on staff to act immediately and appropriately if a disclosure is made. Schools and Local Authorities must be informed immediately to ensure a collaborative and transparent approach.
- 6.2 Children Looked After, previously looked after children 'care leavers', children with social workers and students with special educational needs up to the age of 25 may also need additional services, assistance, protection and consideration. They are supported through the scope of this policy by the dedicated lead for looked after children and care leavers, the additional learning support team and the wider student support teams.





## **7 Prevent**

- 7.1 Chichester College Group is committed to providing students and apprentices with the necessary skills and knowledge to keep themselves and others safe education like other key sectors has responsibility to promote values openness and tolerance and to facilitate free debate which is characteristic of being a British citizen.
- 7.2 The groups approach is informed by the national strategy known as contest including four key elements of pursue, prevent, protect and prepare.
- 7.3 All concerns under the prevent duty will be addressed by College DSLs in collaboration with the Safeguarding Director and Executive Principal as senior leads. Procedures are in place to report concerns to the Prevent teams at the local authority and the Department for Education.
- 7.4 All staff are expected to undertake awareness training and will be supported by the safeguarding team when concerns arise under the Prevent duty.
- 7.5 Reporting on incidents of safeguarding including Prevent as well as reviewing the College Group's Prevent action plan and risk assessment are monitored through the Safeguarding Board and presented on an annual basis to Governors.



## 8 Allegations against staff

The primary concern of the Group is to ensure the safety of its students, apprentices, and adults at risk. It is essential that in all cases of suspected abuse by a member of staff, action is taken quickly and professionally, whatever the validity. It must be made clear; however, suspension is not an indicator of guilt.

In the event that any member of staff suspects any other member of staff of abusing a student or adult at risk, it is their responsibility to bring these concerns to the Director of Safeguarding or Safeguarding Managers, except where they themselves are the suspect. The Director of HR must be informed. The Director of Safeguarding will inform the LADO within 24 hours of a concern/allegation being raised and will agree a course of action with them.

All allegations of this nature will be investigated thoroughly. The investigation will be carried out promptly and within the principles of fairness and consistency.

If the allegation concerns the CEO, Executive Principal or Director of Safeguarding, the matter should be referred to the Designated Governor who will discuss it with the Chair of Governors, in addition to following the normal procedure for safeguarding. Additionally, staff can contact the LADO directly via the contacts numbers:

West Sussex 0330 022 26450 [LADO@westsussex.gov.uk](mailto:LADO@westsussex.gov.uk)

East Sussex - to request a call email [0-19.SPOA@eastsussex.gov.uk](mailto:0-19.SPOA@eastsussex.gov.uk) or call the Single Point of access on 01323464222

Brighton and Hove 01273 290400 [LADOenquiries@brighton-hove.gov.uk](mailto:LADOenquiries@brighton-hove.gov.uk)

Concerns about any members of staff can also be discussed with the Group's Director of Human Resources on 01243 537687.



## **9 Allegations which do not meet the harm threshold**

Any member of staff who has concerns about another member of staff must report these. These are known as a 'low level concern'. They must be reported to either a member of the Safeguarding team or to Human Resources.

'Low level concerns' can take a number of forms but they indicate behaviour which falls outside of the expectations of those working with children, young people and vulnerable adults. It is behaviour which falls short of the CCG Code of Conduct and expectation for professional boundaries. Examples might include being overtly friendly with one student, using inappropriate language or having close physical contact with a student.

All allegations are reported and recorded, in a confidential record held by the HR team. Each allegation is reviewed, and appropriate actions agreed. The advice of the LADO may be sought as necessary.

Low level concerns can be raised about any adult working with young people and vulnerable adults - including volunteers, contractors and supply staff.



## 10 Allegations about employers

Employers and their staff play a key and growing role in supporting and delivering education, training and assessment. Any cases of suspected abuse by an employer or their staff must be investigated quickly and professionally, whatever the validity. The Chief Commercial Officer or Associate Principal Employers & Stakeholders has the right to pause engagement with an employer whilst an investigation takes place.

In the event that suspected abuse by an employer is reported to any member of the college team, that team member is responsible to bring these concerns to the Director of Safeguarding or the Safeguarding Managers. The Chief Commercial Officer or Associate Principal Employers & Stakeholders must also be informed. The LADO must be informed within 24 hours of a concern/allegation being raised.

Depending on the outcome of the investigation, the Associate Principal Employers & Stakeholders or Chief Commercial Officer has the authority to suspend or terminate employer contracts as well as blacklist the employer from future apprenticeships, placements of college engagement activities.



## **10 Designated staff with responsibility for Safeguarding**

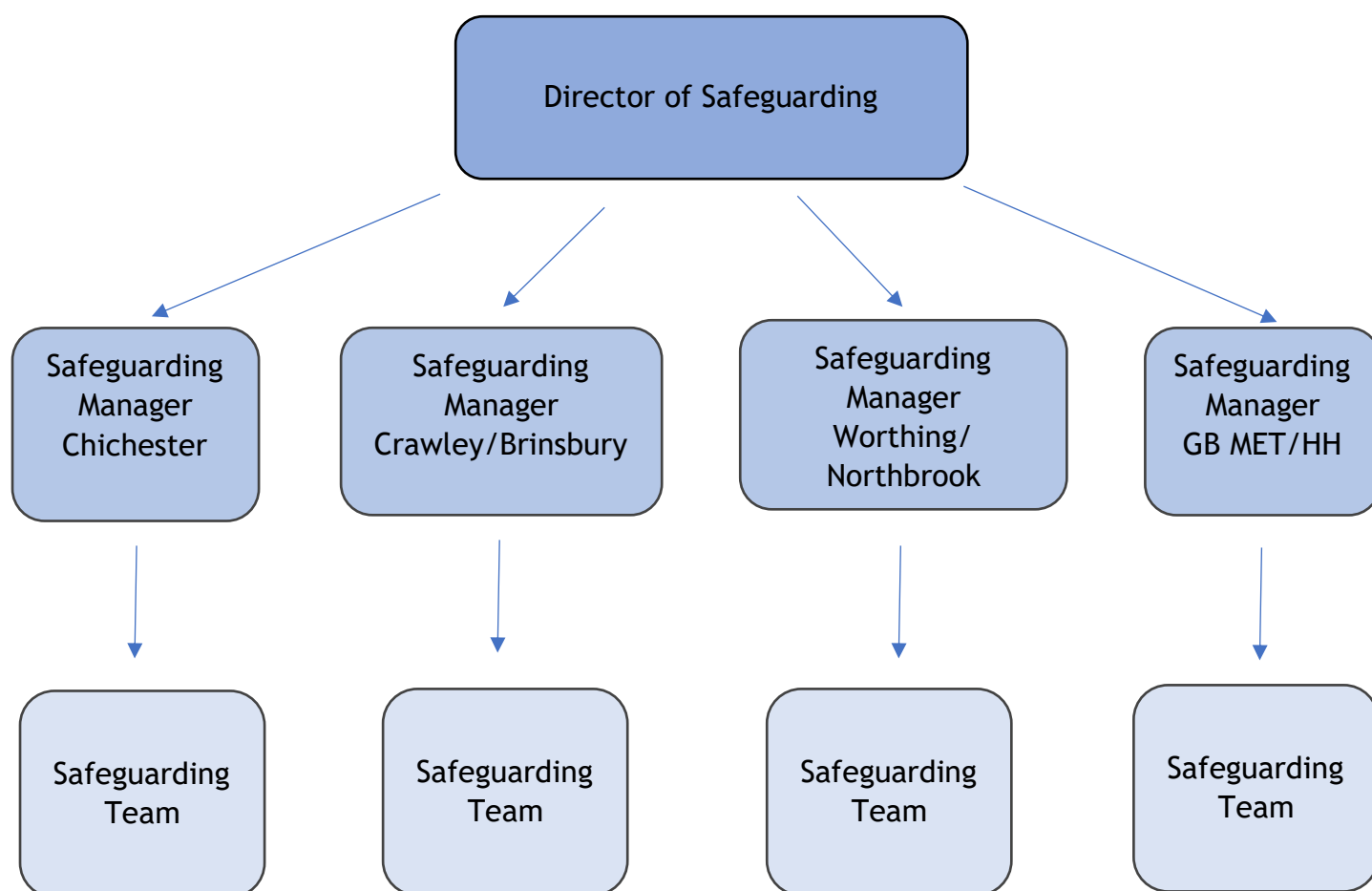
- 10.1 The Designated Lead for Safeguarding for the Group is the Executive Principal, in the absence of the Executive Principal, this role will be fulfilled by Director of Safeguarding. All college Principals will have responsibility for safeguarding for their college. Each college has a Safeguarding Manager affiliated to them who is the Deputy DSL.
- 10.2 The Group Leadership Team (GLT) has a key duty to take lead responsibility for raising staff awareness of issues relating to the welfare and the promotion of a safe environment for the students and adults at risk learning within the Group. GLT ensures all staff receive basic training in safeguarding issues, including Prevent, appropriate to their roles and are aware of the Group's safeguarding procedures. It also ensures parents, guardians or carers of students and adults at risk at the Group are aware of the Group's Safeguarding Policy.
- 10.3 The Safeguarding Managers are responsible for:
- Overseeing the referral of cases of suspected abuse or allegations to the relevant investigating agencies.
  - Providing advice and support to other staff on issues relating to safeguarding.
  - Maintaining a proper record of any safeguarding referral, complaint or concern (even where that concern does not lead to a referral).
  - Liaising with the appropriate local authority, LSCB and LADO and other appropriate agencies.
  - Liaising with employers and training organisations -who receive students from the Group on long-term placements to ensure appropriate safeguards are put in place.
  - Ensuring staff receive basic training in safeguarding issues, including Prevent, appropriate to their roles and are aware of the Group's safeguarding procedures.
  - Liaising with secondary schools to ensure that appropriate arrangements are made for pupils who may be at risk or who are subject to a CP or CIN plan.
  - Ensuring the Group is represented at case conferences and review meetings as appropriate.



- 10.4 The Safeguarding and Prevent Board will provide an annual report to the Group's Governing Body setting out how the Group has discharged its duties (supported by contribution from the lead Governor for Safeguarding). They are responsible for reporting deficiencies in policy or procedure identified by the LADO, or others, to the Governing Body at the earliest opportunity. The Safeguarding Managers will ensure the consistent cross-college implementation of all safeguarding processes and procedures and to ensure appropriate quality standards are reviewed and monitored.
- 10.5 The Director of Information and Funding Information Services and team will make sure structures and processes are in place to ensure the Group holds appropriate levels of contact details for parents, guardians and carers of all students up to the age of 18 (or 25 for students with learning difficulties and/or disabilities). The role of the Safeguarding Managers is to work closely with strategic leads to provide oversight for the outcomes of these children and young people.



## 11 Designated Safeguarding Teams for CCG



Wider Safeguarding team:

14-16 Provision - Teaching & Learning Manager

Accommodation - Head of Accommodation

Apprentices - Vice Principal for Apprentices

Higher Education - Vice Principal for Higher Education



- 11.1 The team is fully trained on all aspects of safeguarding and receive refresher training every two years. Further training has been undertaken on aspects such as transgender awareness, mental health, self-harm, prevention of suicide, substance and alcohol abuse, attachment disorder, FII, Early intervention, Prevent, disinformation/misinformation, trauma related practice.

## **12 Designated Governor**

- 12.1 There is a Designated Governor member of the Governing Body with responsibility for Child Protection, Safeguarding, e-Safety and Prevent implementation. All staff Governors receive appropriate safeguarding and child protection training at induction, and then at regular intervals.
- 12.2 The Designated Governor is responsible for liaising with the designated person with lead responsibility over matters regarding Child Protection, Safeguarding, e-Safety and Prevent, ensuring that:
- The Group has procedures and policies which are consistent with the LSCB procedure
  - The Governing Body considers the Group policy on Child Protection, Safeguarding, e-Safety and Prevent each year
  - Each year the Governing Body is informed of how the Group and its staff have complied with the policy including, but not limited to, a report on the training staff have undertaken
- 12.3 The Designated Governor is responsible for overseeing the liaison between agencies, such as the Police and Social Services, in connection with allegations against the GLT or the designated person. This will not involve undertaking any form of investigation but will ensure good communication between parties and provide information to assist enquiries.
- 12.4 To assist in these duties, the Designated Governor shall receive appropriate training. The Designated Governor is a member of the Safeguarding and Prevent Board.





## **13 Training**

- 13.1 The Designated Leads and Deputy Leads, as indicated in this policy, will have completed Level 3 Designated Safeguarding Lead training, provided by the local authority, refreshed every two years.
- 13.2 The Designated Safeguarding Officers and Designated Governor will have completed the recommended safeguarding training through the Local Authority.
- 13.3 All governors will receive appropriate safeguarding training at induction, and then at regular intervals. The training will provide them with the knowledge to ensure the college's safeguarding policies and procedures are effective.
- 13.4 All staff, including temporary, bank staff, agency workers and volunteers, who work with students and/or adults at risk should undertake appropriate training to equip them to carry out their responsibilities effectively, and this is kept up to date by refresher training annually through online modules covering Safeguarding, Prevent and Online Safety, including expectations, roles and responsibilities related to filtering and monitoring online activities to ensure a secure online environment for students. Staff completion of online modules is reported to the Safeguarding and Prevent Board half-termly to ensure compliance.
- 13.5 All staff should receive regular updates through emails, e-bulletins and staff meetings to ensure staff are equipped with the latest skills and knowledge to safeguard children effectively
- 13.6 All staff should understand the significance of risks both online and offline, including child to child online abuse (see Annex 5)
- 13.7 Safeguarding and Prevent are covered at both staff and student inductions as well as at other times during the year.
- 13.8 All HE staff will complete the recommended Home Office Prevent training.



## **14 Confidentiality**

- 14.1 Confidentiality and trust should be maintained as far as possible, but staff must act on the basis that the safety of the person disclosing is the overriding concern. The degree of confidentiality will be governed by the need to protect those concerned. The young person or vulnerable adult should be informed at the earliest possible stage of the disclosure the information will be passed on.
- 14.2 The Group complies with current legislation, General Data Protection Regulations (GDPR) 2018, which allows for disclosure of personal data where this is necessary to protect the vital interests of a student or adult at risk.

## **15 Safer recruitment**

- 15.1 Safer recruitment is part of the Recruitment and Selection Policy. There is also a Disclosure and Barring Service Policy and a Recruitment of Ex-Offenders Policy.
- 15.2 In line with guidance in KCSIE, all pre-employment checks are carried out by the Human Resources Department. As part of these pre-employment checks, online searches are carried out on all new starters.
- 15.3 The Human Resources Department will maintain a single central register of all checks carried out on all staff and volunteers who will work with anyone within the scope of this policy. KCSIE 2022 clarified that a CV should only be accepted alongside a full application form and is not sufficient on its own to support safer recruitment.

## **16 Communication**

- 16.1 The policy is displayed on the Group's websites, staff intranet and the Virtual Learning Environment for students and apprentices (CCG online).



## **17 Status of this policy**

- 17.1 The transitional policy was approved through Chair's action by the Group Leadership Team in September 2024 and supersedes all previous documentation.
- 17.2 The operation of this policy will be kept under review by the Executive Principal. It may be reviewed and varied from time to time by the Safeguarding & Prevent Board.
- 17.3 This policy has been equality impact assessed to ensure that it does not adversely affect staff/student/others.

Date Approved: September 2024  
Approved by: Group Leadership Team  
Implementation Date: September 2024  
Date for Review: September 2025



## **Annex 1 - Keeping Children Safe in Education (KCSiE) - Translations**

It is the responsibility of everyone to keep children safe and to read Part One of the statutory guidance “Keeping Children Safe in Education”.

The London Grid for Learning (LGfL) have had KCSiE part one translated into a number of languages:

- Arabic
- Bengali
- Cantonese
- Gujarati
- Mandarin
- Polish
- Portuguese
- Punjabi
- Spanish
- Urdu

The translations can be downloaded here:

<https://national.lgfl.net/DigiSafe/kcsietranslate>



## Annex 2 - Definitions

- **Safeguarding** is a term, which is broader than “child protection” and relates to the action taken to promote the welfare of children and young people and protect them from harm. Safeguarding is everyone’s responsibility.
- **Children and Young People** - throughout the document, references are made to “children and young people”. These terms are interchangeable and refer to children to have not yet reached 18 or vulnerable adults up to the age of 25.
- **Staff** - includes any adult who is employed, commissioned or contracted to work with children or young people, including volunteers and guest speakers in either a paid or an unpaid capacity.
- **Designated Safeguarding Officers** - a member of the wider Safeguarding Team trained to Level 3.
- **Duty of Care** - the duty which rests upon an individual or organisation to ensure the safety of a child or young person involved in any activity or interaction for which that individual or organisations is responsible.
- **External Agencies** - including Children’s Services, Independent Safeguarding Authority, West and East Sussex Safeguarding Board, Brighton and Hove Albion Safeguarding Board, Police, etc.
- **External Contractors** - including building or maintenance contractors who are required to work at the Group for a given period.
- **Vulnerable Adult** - someone who is over 18 who is, or may be, in need of community services due to age, illness or a mental or physical disability, who is, or may be unable to take care of himself/herself, or unable to protect himself/herself against significant harm or exploitation.



### **Annex 3 - Chichester College Group approach to address sexual harassment and online sexual abuse**

As a college group (whilst there may not be significant evidence available) within the culture and values of CCG, sexual harassment and online sexual abuse are not tolerated, and where any issues are identified, support and early intervention to protect individuals and groups within our community.

In order to do this, we will assume that sexual harassment and online sexual abuse are happening in our colleges, even when there are no specific reports, and ensure a whole College group approach to address them within the safeguarding processes and procedures in place.

We will work to:

- minimise potential barriers in reporting and disclosing instances of harassment and sexual misconduct
- ensure that investigatory procedures are fair and independent
- ensure all students involved receive appropriate support
- clearly set out behavioural expectations for all students

Our CCG approach includes:

- a carefully sequenced content delivered through the PDP (adapted for Foundation Learning, 14-16 FT provision, apprentices, and HE) based around the Department for Education's (DfE's) statutory guidance, that specifically includes sexual harassment and sexual violence, including online. Students will have the opportunity to discuss such as consent and the sending of 'nudes'
- provision of training and support for staff and host families providing accommodation for students to increase awareness
- high-quality training for teachers and student support staff - to raise awareness for signposting and support and to provide confidence in delivery/discussion
- Sustained use of Safeguard for record-keeping and analysis of sexual harassment and sexual violence, including online, to identify patterns and intervene early to prevent abuse



- To report regularly on sexual harassment and sexual violence at Safeguarding and Prevent Board, Group Leadership Team (GLT) and to the Corporation annually (with termly updates to safeguarding Governor)
- Through the positive about behaviour approach and referral process to reinforce a culture where sexual harassment and online sexual abuse are not tolerated
- To work closely with external agencies to raise awareness and increase knowledge of the range of support available to children and young people who are victims or who perpetrate harmful sexual behaviour
- To provide support and supervision for the safeguarding officer team
- To provide updated Safeguarding training to ensure that all staff (and governors, where relevant) are able to:
  - better understand the definitions of sexual harassment and sexual violence, including online sexual abuse
  - identify early signs of peer-on-peer sexual abuse
  - consistently uphold standards in their responses to sexual harassment and online sexual abuse



## **Annex 4 - Information on recognising abuse**

### **What is neglect?**

Neglect is the ongoing failure to meet a child's basic needs and the most common form of child abuse. A child might be left hungry or dirty, or without proper clothing, shelter, supervision or health care. This can put children and young people in danger. And it can also have long term effects on their physical and mental wellbeing.

### **Signs of abuse**

#### **Poor appearance and hygiene**

- being smelly or dirty
- being hungry or not given money for food
- having unwashed clothes
- having the wrong clothing, such as no warm clothes in winter

#### **Health and development problems**

- anaemia
- body issues, such as poor muscle tone or prominent joints
- medical or dental issues
- missed medical appointments, such as for vaccinations
- not given the correct medicines
- poor language or social skills
- regular illness or infections
- repeated accidental injuries, often caused by lack of supervision
- skin issues, such as sores, rashes, flea bites, scabies or ringworm
- thin or swollen tummy
- tiredness
- untreated injuries
- weight or growth issues.

#### **Housing and family issues**

- living in an unsuitable home environment, such as having no heating
- being left alone for a long time
- taking on the role of carer for other family members.





## Changes in behaviour

- becoming aggressive
- being withdrawn, depressed or anxious
- changes in eating habits
- displaying obsessive behaviour
- finding it hard to concentrate or take part in activities
- poor attendance
- showing signs of self-harm. Using drugs or alcohol

## What is physical abuse?

Physical abuse is when someone hurts or harms a child or young person on purpose. It includes hitting with hands or objects, slapping and punching, kicking, shaking, throwing, poisoning, burning and scalding, biting and scratching. It's important to remember that physical abuse is any way of intentionally causing physical harm to a child or young person. It also includes making up the symptoms of an illness or causing a child to become unwell.

## Signs of abuse

Bumps and bruises don't always mean a child is being physically abused. All children have accidents, trips and falls. And there isn't just one sign or symptom to look out for. But it's important to be aware of the signs.

If a child regularly has injuries, there seems to be a pattern to the injuries or the explanation doesn't match the injuries, then this should be reported.

Symptoms include:

- bruises
- broken or fractured bones
- burns or scalds
- bite marks

It can also include other injuries and health problems, such as:

- scarring
- the effects of poisoning, such as vomiting, drowsiness or seizures
- breathing problems from drowning, suffocation or poisoning



## **What is sexual abuse?**

When a child or young person is sexually abused, they're forced or tricked into sexual activities. They might not understand that what's happening is abuse or that it's wrong. And they might be afraid to tell someone. Sexual abuse can happen anywhere - and it can happen in person or online.

It's never a child's fault they were sexually abused - it's important to make sure children know this.

## **Types of sexual abuse**

There are 2 types of sexual abuse - contact and non-contact abuse. And sexual abuse can happen in person or online.

Contact abuse is where an abuser makes physical contact with a child. This includes:

- sexual touching of any part of a child's body, whether they're clothed or not
- using a body part or object to rape or penetrate a child
- forcing a child to take part in sexual activities
- making a child undress or touch someone else

Contact abuse can include touching, kissing and oral sex - sexual abuse isn't just penetrative.

Non-contact abuse is where a child is abused without being touched by the abuser. This can be in person or online and includes:

- exposing or flashing
- showing pornography
- exposing a child to sexual acts
- making them masturbate
- forcing a child to make, view or share child abuse images or videos
- making, viewing or distributing child abuse images or videos
- forcing a child to take part in sexual activities or conversations online or through a smartphone



### Emotional and behavioural signs:

- Avoiding being alone with or frightened of people or a person they know.
- Language or sexual behaviour you wouldn't expect them to know.
- Having nightmares or bed-wetting.
- Alcohol or drug misuse.
- Self-harm.
- Changes in eating habits or developing an eating problem.
- Changes in their mood, feeling irritable and angry, or anything out of the ordinary

### Physical signs:

- Bruises.
- Bleeding, discharge, pains or soreness in their genital or anal area.
- Sexually transmitted infections.
- Pregnancy.

### What is emotional abuse?

Emotional abuse is any type of abuse that involves the continual emotional mistreatment of a child or young person. It's sometimes called psychological abuse. Emotional abuse can involve deliberately trying to scare, humiliate, isolate or ignore a child or young person.

Emotional abuse is often a part of other kinds of abuse, which means it can be difficult to spot the signs or tell the difference, though it can also happen on its own.

### Types of emotional abuse include:

- Humiliating or constantly criticising the child
- Threatening behaviour including shouting
- Using sarcasm or making the child the subject of jokes
- Blaming the child for situations
- Making a child perform degrading acts
- Pushing a child or trying to control their lives
- Exposing a child to events or situations such as domestic abuse or drug taking
- Not allowing a child to have friends
- Failing to promote a child's social development
- Making a child perform degrading acts



- Persistently ignoring a child
- Being absent
- Manipulating a child
- Being constantly negative about the child
- Never showing any emotion to a child

### **Signs of emotional abuse**

With emotional abuse there may not be any obvious physical signs and a child may not tell anyone what is happening until they reach a crisis point. It is therefore important you look at how the child is acting and behaving. Signs may include:

- Unconfident or lacking in self-assurance
- Struggling to control their emotions
- Having difficulty in maintaining relationships
- Acting in a way that is inappropriate for their age
- Use of inappropriate language
- Being isolated from their parents
- Lacking social skills
- Have few or no friends



## **Annex 5 - Recognition of Technology in Safeguarding**

Technology plays a significant role in many safeguarding and wellbeing issues. KCSIE 2024 highlights several critical points:

- **Dual Risks:** Children face risks both online and offline, and these risks often occur simultaneously. Staff must be vigilant in recognising and addressing these dual threats
- **Child to Child Online Abuse:** The document identifies the growing concern of children abusing other children online. This abuse can manifest in various forms, such as:
  - i. Abusive, harassing, and misogynistic messages.
  - ii. Non-consensual sharing of indecent images, particularly within chat groups.
  - iii. Sharing of abusive images and pornography with individuals who do not wish to receive such content.



**Resources:**

Each College has its own page on CCG online providing information for our students, Apprentices and Vulnerable Adults including links and signposting for internal and external support.

Support, advice and guidance is available on the Staff Intranet.

**Remember Safeguarding is Everyone's responsibility.**

**If you have any concerns or are unsure you can speak to someone from the Safeguarding Team at your College**

**Please ensure you have completed your online module for Safeguarding and Prevent which will include reading Keeping Children Safe in Education Part 1 which applies to all staff.**