

# Safeguarding & Prevent Policy

Designated Safeguarding Lead: Janine Rusbridge  
Deputy Designated Safeguarding Lead: Claire Cross  
Safeguarding Governor: Nick Spenceley

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## Contents

<b>Safeguarding &amp; Prevent Policy .....</b>	<b>.....</b>
1 Introduction .....	1
2 Statutory Framework .....	2
3 Roles & Responsibilities .....	3
3.1 The Governing Body .....	3
3.2 The Designated Safeguarding Lead and Deputy Designated Safeguarding Lead (DSL & DDSL) .....	4
3.3 All Staff .....	4
3.4 Level 3 Trained Safeguarding Team .....	4
4 Types of Abuse / Specific Safeguarding Issues .....	4
4.1 Child Criminal exploitation (CCE) and Child Sexual Exploitation (CSE) .....	5
4.2 Children Missing From Education .....	6
4.3 Contextual Safeguarding .....	6
4.4 Domestic Abuse .....	6
4.5 Mental Health .....	7
4.6 Online Safety .....	7
4.7 Peer on Peer Abuse .....	8
4.8 Prevention of Radicalisation .....	8
4.9 Serious Violence .....	9
4.10 Sexual Violence & Harassment .....	9
5 Young People Potentially At Risk of Greater Harm .....	11
6 Procedures .....	11
7 Training .....	13
8 Records & Information Sharing .....	13
9 Inter-Agency Working .....	14
10 Allegations About Members of the Workforce .....	14
11 Use of Reasonable Force .....	15
12 Whistleblowing .....	15
Appendix A: Children and Families Service Map and Key Contacts .....	16
Appendix B: Essex Windscreen of Need and levels of intervention .....	17
Appendix C - Essex CSE Arrangements .....	18

# 1 Introduction

Education institutions and their staff form a vital part of the wider safeguarding system for young people and adults who access education through them. Everyone who comes into contact with children and their families and carers has a role to play in safeguarding children. We also recognise our role in protecting adults at risk. In order to fulfil this responsibility effectively, all professionals should make sure their approach is person-centred. This means that they should consider, at all times, what is in the best interests of the individual.

At Writtle University College when we use the term safeguarding we use to encompass all aspects of the work we do in this area which includes adult safeguarding, child protection and Prevent.

This policy is for all staff, parents/carers, governors, volunteers and the wider WUC community. It forms part of the safeguarding arrangements for our institution and should be read in conjunction with Keeping Children Safe in Education (DfE, 2021) and Student & Staff Codes of Conduct.

The governing body and all staff are committed to ensuring that the University College:

- understands and promotes the principle that everyone who comes in contact with young people and their families has a role to play in safeguarding;
- provides a safe environment for young people and adults in which to learn;
- identifies young people and adults who are a cause for concern and may benefit from early help, as well as those in immediate danger or at risk of harm;
- has appropriate procedures for following up unauthorised absence and for young people who go missing from education;
- recognises that we have an important role to supporting the mental health and wellbeing of our students and has clear systems and processes for identifying possible mental health problems, including routes to escalate and clear referral and accountability systems;
- always acts in the best interests of the young person or adult at risk; and
- works with other services (as needed) taking appropriate action to ensure young people and adults at risk are kept safe.

Safeguarding and promoting the welfare of children (everyone under the age of 18) is defined in Keeping Children Safe in Education as:

- Protecting children from maltreatment
- Preventing impairment of children's mental and physical health or development
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- Taking action to enable all children to have the best outcomes

Safeguarding adults means protecting a person's rights to live in safety, free from abuse or neglect. An adult at risk is any person who is aged over 18 years or over and at risk of abuse or neglect because of their needs for care and or support.

WUC takes a whole institution approach to safeguarding, which ensures that keeping children and adults at risk safe is at the heart of everything we do and underpins all systems, processes and policies. It is important that our values are understood and shared by all students, staff, parents/carers, governors and the wider University College community. We recognise that we need to work in partnership to help keep our community safe.

## 2 Statutory Framework

There is government guidance set out in [Working Together \(DfE, 2018\)](#) on how agencies must work in partnership to keep children safe. This guidance places a shared and equal duty on three Safeguarding Partners (the Local Authority, Police and Health) to work together to safeguard and promote the welfare of all children in their area under multi-agency safeguarding arrangements. These arrangements sit under the [Essex Safeguarding Children Board](#) (ESCB). In Essex, the statutory partners are Essex County Council, Essex Police and five of the seven Clinical Commissioning Groups covering the county.

Section 175 of the Education Act 2002 places a statutory responsibility on the governing body to have policies and procedures in place that safeguard and promote the welfare of children who are in education.

In Essex, all professionals must work in accordance with the [SET Procedures](#). Writtle University College (WUC), like many other education providers, also works in accordance with the following legislation and guidance (*this is not an exhaustive list*):

[Keeping Children Safe in Education \(DfE, 2021\)](#)

[Working Together \(DfE, 2018\)](#)

Education Act (2002)

Care Act (2014)

[Essex Effective Support](#)

[Counter-Terrorism and Security Act \(HMG, 2015\)](#)

[Serious Crime Act 2015](#) (Home Office, 2015)

Children and Social Work Act (2017)

[Children Missing Education - statutory guidance for local authorities \(DfE, 2016\)](#)

Sexual Offences Act (2003)

Mental Capacity Act (2005)

Education (Pupil Registration) Regulations (2006)

[Information sharing advice for safeguarding practitioners \(HMG, 2018\)](#)

[Data Protection Act \(2018\)](#) & the General Data Protection Regulation & the Data Protection Order (2000)

Human Rights Act (1998)

[What to do if you're worried a child is being abused](#) (HMG, 2015)

[Searching, screening and confiscation](#) (DfE, 2018)

Children Act (1989 & 2004)

[Preventing and Tackling Bullying \(DfE, 2017\)](#)

Female Genital Mutilation Act 2003 (S. 74 - Serious Crime Act 2015)

[Sexual violence and sexual harassment between children at WUCs and colleges \(DfE, 2021\)](#)

[Promoting positive emotional well-being and reducing the risk of suicide \(ESCB, 2018\)](#)  
[Preventing youth violence and gang involvement \(Home Office, 2015\)](#)  
[Criminal Exploitation of children and vulnerable adult - county lines guidance \(Home Office, 2018\)](#)  
[Teaching on-line safety at WUCs \(DfE, 2019\)](#)

### **3 Roles & Responsibilities**

All adults working at WUC have a responsibility to protect students and to provide a safe environment in which they can learn and achieve their full potential. However, there are key people within institutions and the Local Authority who have specific responsibilities under safeguarding procedures. The names of those at WUC with these specific responsibilities (the Designated Safeguarding Lead and Deputy Designated Safeguarding Lead) are shown on the cover sheet of this document.

#### **3.1 The Governing Body**

The governing body ensures that the policies, procedures and training at WUC are effective and comply with the law at all times. It ensures that all required policies relating to safeguarding are in place, that the safeguarding policy reflects statutory and local guidance and is reviewed at least annually.

The governor for safeguarding arrangements is named on the front cover of this document. This governor takes strategic responsibility at governing body level for safeguarding arrangements in our University College. The governing body ensures there is a named Designated Safeguarding Lead (DSL) and at least one Deputy Designated Safeguarding Lead (DDSL) in place.

The governing body ensures the University College contributes to inter-agency working, in line with statutory and local guidance. It ensures that information is shared and stored appropriately and in accordance with statutory requirements.

The governing body ensures that all adults in our University College who work with children undergo safeguarding and child protection training at induction, as appropriate, and that it is regularly updated. All staff members receive regular safeguarding and child protection updates, at least annually, to provide them with the relevant skills and knowledge to keep our students safe.

The governing body ensures our young people are taught about safeguarding (including online safety) through teaching and learning opportunities as part of a broad and balanced curriculum and wider enrichment activities.

The governing body and University College leadership team are responsible for ensuring the University College follows recruitment procedures that help to deter, reject or identify people who might abuse children. It adheres to statutory responsibilities to check adults working with children and has recruitment and selection procedures in place (see the University College's 'Safer Recruitment' policy for further information). It ensures that volunteers are appropriately supervised at WUC.

### **3.2 The Designated Safeguarding Lead and Deputy Designated Safeguarding Lead (DSL & DDSL)**

The DSL at WUC has ultimate strategic lead responsibility for safeguarding and ensures all staff are appropriately trained. They oversee the role of DDSL, whose role includes management of child protection/adult safeguarding referrals, working with other agencies, and raising awareness of all safeguarding policies and procedures. Together these roles ensure that everyone at WUC (including temporary staff, volunteers and contractors) is aware of these procedures and that they are followed at all times. They act as a source of advice and support for staff on safeguarding matters and ensure that timely and appropriate referrals are made in accordance with current procedures. They work with the Local Authority and Local Safeguarding Boards as required and ensure that information is shared appropriately.

The DSL and DDSL are both trained to the same level and can cover each other's responsibilities when required.

### **3.3 All Staff**

Everyone in our University College has a responsibility to provide a safe learning environment in which our students can learn and achieve. Any young person may benefit from early help and all staff members are aware of the local early help process and their role in it. They are aware of signs of abuse and neglect so they are able to identify those who may be in need of help or protection. All staff members are aware of and follow University College processes. If staff have any safeguarding concerns about a student, they must act on them immediately and speak with a member of the trained level 3 Safeguarding team at WUC.

### **3.4 Level 3 Trained Safeguarding Team**

WUC has decided to train a small team of staff (across WUC) to the same level as the DSL/DDSL to ensure adequate operational cover allowing safeguarding matters to be responded to in a timely and effective manner. This team directly support/advise students and staff, take appropriate short and medium term action, ensure support is put in place and adequate records are kept updated. They will seek advice/guidance from the DSL/DDSL as appropriate, know how to make referrals (supported by the DSL/DDSL) and can be required to attend case conferences/review meetings to represent WUC.

## **4 Types of Abuse / Specific Safeguarding Issues**

Keeping Children Safe in Education (DfE, 2021) describes abuse in the following way:

*"Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to*

*them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or another child or children"*

Keeping Children Safe in Education refers to four categories of abuse: Physical, Emotional, Sexual and Neglect.

WUC staff will always reassure anyone who reports abuse that they are taken seriously and that they will be supported and all best endeavours will be used to keep them safe. A victim should never be made to feel ashamed for making a report, nor given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment.

All staff are aware of environmental factors which may impact on a young person's welfare and safety and understand safeguarding in the wider context (contextual safeguarding). We understand that abuse, neglect and safeguarding issues are rarely 'stand-alone' events and that, in most cases, multiple issues will overlap.

In addition, staff are aware of other types of abuse and safeguarding issues that can put young people at risk of harm. They understand that behaviours linked to issues such as drug taking and/or alcohol misuse, deliberately missing education and consensual/non-consensual sharing of nudes and semi-nude's images and/or videos can be signs that children are at risk. [UKCIS](#) provides detailed advice about sharing of nudes and semi-nude images and videos.

#### **4.1 Child Criminal exploitation (CCE) and Child Sexual Exploitation (CSE)**

Both CCE and CSE are forms of abuse that occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in sexual or criminal activity, in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. CSE and CCE can affect children, both male and female and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation.

Some specific forms of CCE can include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting or pickpocketing. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others.

Child Sexual Exploitation (CSE) is a form of child abuse, which can happen to boys and girls from any background or community. It may occur over time, or be a one-off occurrence. In Essex, the definition of Child Sexual Exploitation (CSE) from the Department of Education (DfE, 2017) has been adopted:

*"Child Sexual Exploitation is a form of child sexual abuse. It occurs when an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology".*



It is understood that a significant number of children who are victims of CSE go missing from home, care and education at some point. Our University College is alert to the signs and indicators of a young person becoming at risk of, or subject to, CSE and will take appropriate action to respond to any concerns. The DDSL will lead on these issues and work with other agencies as appropriate. This [one page map](#) sets out arrangements for CSE in Essex (see Appendix C).

## **4.2 Children Missing From Education**

All children, regardless of their age, ability, aptitude and any special education needs they may have, are entitled to a full-time education. Our University College recognises that a child missing education is a potential indicator of abuse or neglect and will follow appropriate procedures/protocols for unauthorised absence and for children missing education. It is also recognised that, when not at WUC, young people may be vulnerable to or exposed to other risks, so we work with parents and other partners to keep young people safe whenever possible.

For under 18s, WUC should always be informed of the reason for any absence. Where contact is not made, appropriate action will be taken (including contacting emergency contacts held on student records). Where appropriate, this could then lead to a referral to another appropriate agency (Education Access Team, Social Care and/or Police).

## **4.3 Contextual Safeguarding**

Safeguarding incidents and behaviours can be associated with factors outside our University College. All staff are aware of contextual safeguarding and the fact they should consider whether wider environmental factors present in a person's life are a threat to their safety and/or welfare. To this end, WUC will consider relevant information when assessing any risk and share it with other agencies to support better understanding of the individual and their circumstances.

## **4.4 Domestic Abuse**

Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. Domestic abuse is not limited to physical acts of violence or threatening behaviour, and can include emotional, psychological, controlling or coercive behaviour, sexual and/or economic abuse. WUC recognises that exposure to domestic abuse can have a serious, long-term emotional and psychological impact. We work with other key partners and will share relevant information where there are concerns that domestic abuse may be an issue for a child or family or be placing a child at risk of harm.

So-called 'honour-based violence' (including Female Genital Mutilation and forced marriage) *Female Genital Mutilation* (FGM) comprises all procedures involving partial or total removal of the external female genitalia or other injury to female genital organs. It is illegal in the UK and a form of child abuse.

As of October 2015, the Serious Crime Act 2015 (Home Office, 2015) introduced a duty on teachers (and other professionals) to notify the police of known cases of female genital mutilation where it appears to have been carried out on a girl under the age of 18.

A *forced marriage* is one entered into without the full consent of one or both parties. It is where violence, threats or other forms of coercion is used and is a crime. WUC staff would report this as a safeguarding concern where they believe this may be an issue.

## 4.5 Mental Health

Our staff are aware that mental health problems can, in some cases, be an indicator that a young person has suffered or is at risk of suffering abuse, neglect or exploitation. We understand that, where they have suffered abuse or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. Where we have concerns this may impact on mental health, we will seek advice and work with other agencies as appropriate to support and ensure they receive the help they need.

Positive mental health is the concern of the whole community and we recognise that education institutions play a key part in this. WUC aims to develop the emotional wellbeing and resilience of all students and staff, as well as provide specific support for those with additional needs. We understand that there are risk factors which increase someone's vulnerability and protective factors that can promote or strengthen resiliency. The more risk factors present in an individual's life, the more protective factors or supportive interventions are required to counter-balance and promote further growth of resilience.

It is vital that WUC work in partnership with parents/carers to support the wellbeing of our young people. Parents are able to share any concerns about the wellbeing of their child with WUC, so appropriate support and interventions can be identified and implemented. Confidentiality is managed appropriately, particularly when we are dealing with over 18s, who as adults would need to consent with the sharing of information (unless the safeguarding situation dictated otherwise).

## 4.6 Online Safety

We recognise that our young people are growing up in an increasingly complex world, living their lives on and offline. This presents many positive and exciting opportunities, but we recognise it also presents challenges and risks. Any student can be vulnerable online, and their vulnerability can fluctuate depending on their age, developmental stage and personal circumstances. We want to equip our students with the knowledge needed to make the best use of the internet and technology in a safe, considered and respectful way, so they are able to reap the benefits of the online world.

The range of online risks could be categorised as:

- content: being exposed to illegal, inappropriate or harmful material; for example pornography, fake news, suicide, racist or radical and extremist views;

- contact: being subjected to harmful online interaction with other users; for example peer to peer pressure, commercial advertising as well as adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes;
- conduct: personal online behaviour that increases the likelihood of, or causes, harm; for example making, sending and receiving explicit images, or online bullying
- commerce: risks such as online gambling, inappropriate advertising, phishing and / or financial scams.

WUC staff are aware of the risks online and seek to help students keep themselves safe online in a range of ways. Some of these are detailed within WUC's IS&T policy.

## 4.7 Peer on Peer Abuse

WUC may be the only stable, secure and safe element in the lives of young people at risk of, or who have suffered harm. Nevertheless, whilst at University College, their behaviour may be challenging and defiant, or they may instead be withdrawn, or display abusive behaviours towards others. Our University College recognises that some young people may abuse their peers and that this may happen at WUC, or outside of it. Any incidents of peer on peer abuse will be managed in the same way as any other safeguarding concern and will follow the same procedures. We will seek advice and support from other agencies as appropriate.

WUC recognises that, even though peer on peer abuse / harmful sexual abuse may not be reported, it is likely that it is occurring and we are clear there is a zero tolerance to inappropriate or abusive behaviour. We understand the barriers which may prevent someone from reporting abuse and actively work to remove these.

Peer on peer abuse can manifest itself in many ways. This may include bullying (including cyber bullying), physical abuse, sexual violence / sexual harassment, 'up-skirting', 'sexting' or initiation / hazing type violence and rituals. We do not tolerate any harmful behaviour at WUC and will take swift action to intervene where this occurs – we do not normalise abuse, nor allow a culture where it is tolerated. Where appropriate, risk assessments would be put in place and action may be taken under WUC's Student Disciplinary Policy.

We use enrichment and cross institutional initiatives lessons to help young people understand what abuse is and encourage them to tell a member of staff if someone is behaving in a way that makes them feel uncomfortable. WUC understands the different gender issues that can be prevalent when dealing with peer on peer abuse.

## 4.8 Prevention of Radicalisation

As of July 2015, the [Counter-Terrorism and Security Act \(HMG, 2015\)](#) placed a new duty on Universities, Colleges and other education providers. Under section 26 of the Act, we are required, in the exercise of their functions, to have "due regard to the need to prevent people from being drawn into terrorism". This duty is known as the Prevent duty.

WUC is required to:

- Assess risk of radicalisation in our area/institution;
- Develop and progress an action plan to reduce this risk;
- Train staff to recognise radicalisation and extremism;
- Work in partnership with other agencies;
- Develop referral mechanisms and refer people to Channel;
- Maintain records and reports to show compliance;
- Promote British Values;
- Update relevant policies and procedures;
- Prepare young people for the opportunities, responsibilities and experiences of life and promote community cohesion;
- Provide safe spaces in which young people can understand and discuss sensitive topics, including terrorism and the extremist ideas that are part of terrorist ideology;
- be mindful of existing duties to forbid political indoctrination and secure a balanced presentation of political issues.

Channel is a national programme which focuses on providing support at an early stage to people identified as vulnerable to being drawn into terrorism.

WUC operates in accordance with local procedures for Prevent and with other agencies, sharing information and concerns as appropriate. Where we have concerns about extremism or radicalisation, we will seek advice from appropriate agencies and, if necessary, refer to Social Care and/or the Channel Panel.

## **4.9 Serious Violence**

All staff are aware of the risk factors and indicators which may signal that young people are at risk from or involved with serious violent crime. These may include increased absence from University 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 a child has been approached by, or is involved with, individuals associated with criminal networks or gangs. It is understood that there are a range of risk factors which increase the likelihood of involvement in serious violence, such as being male, frequent absenteeism or exclusion from school, having experienced child maltreatment and have been involved in offending.

## **4.10 Sexual Violence & Harassment**

Reports of Sexual Violence and sexual harassment are likely to be complex and require difficult professional decisions to be made. Effective training, policies, good sector practice and external agencies will provide WUC with a considered and appropriate response to any reports.

WUC has a small team of Sexual Violence Liaison Officers (SVLOs) who have received specialist training to enable them to support victims/survivors of sexual violence and signpost them to external support agencies and navigate internal processes. Members of staff supporting students who have disclosed

sexual violence should, with the consent of the reporting party, contact a SVLO who will provide the student with up to date and relevant advice on support and reporting options.

Where there has been a report of sexual harassment/domestic or sexual violence, the need for a risk assessment should be considered on a case by case basis.

The risk and needs assessment should consider:

- The Reporting Party (especially their protection and support);
- The Reported Party (accepting that potentially the reporting party may choose not name to the reported party);
- If there are dependent children present in the home of the reporting party; and
- The other students and staff (if appropriate).
- Risk assessments should be recorded (in an appropriate manner and with restricted access) and kept under review. Where there has been a report of sexual violence it is likely that other agencies and professionals will be involved, especially where the reporting party is under 18 years of age. WUC's risk assessment, should, of course be informed by this expert advice and guidance.

When deciding on subsequent actions, the DSL/DDSL should consider:

- The wishes of the reporting party in terms of how they want to proceed – reporting parties should be given as much control as is reasonably possible over decisions regarding how any investigation will be progressed and any support that they will be offered;
- The nature of the alleged incident(s), including whether a crime may have been committed and consideration of harmful sexual behaviour;
- The ages of those involved;
- Any power imbalance;
- If the alleged incident is a one off or suggests a pattern of abuse;
- Are there ongoing risks to other students or WUC staff;
- Other contextual information.

As with all safeguarding matters the best interest of the young person or adult at risk should be paramount. Immediate consideration should be given as to how best to support and protect the reporting party, the reported party and any others involved/impacted.

It is important that WUC considers every report on a case by case basis. When to inform the reported party will be a decision that should be carefully considered. Where a report is going to be made to children's social care and/or the police, then, as a general rule, the university college should seek to gain consent from the reporting party to speak to the relevant agency and, where appropriate discuss next steps with relevant agencies, and how the reported party will be informed of the allegations. However, as per general safeguarding principles, this does not, and should not, stop WUC taking immediate action to safeguard their students and staff, where required.

Support for the reporting party should be ongoing and tailored on a one to one basis but can include Independent Sexual Violence Advisors, mental health services, Sexual Health/GP services, Rape Crisis/Sexual Assault Referral Centres, as well as WUC support services (such as counselling, SVLO support via the Wellbeing team).

WUC needs, at the same time, to also consider how best to independently support and safeguard the reported party.

There is some further information, support and resources available for colleges in the DfE [Sexual Violence and Sexual Harassment between Children in Schools and Colleges](#) that should be referred to.

WUC is developing separate policy and guidelines which take account of the above, but also recognises our HEI status and therefore considers in more detail the differences between under 18s and adults and the recommendations made in publications such as Changing the Culture (Report of the Universities UK Taskforce examining violence against women, harassment and hate crime affecting university students) and the UUK's 'Guidance for Higher Education Institutions - How to handle alleged student misconduct that may constitute a criminal offence'.

## **5 Young People Potentially At Risk of Greater Harm**

We recognise that some young people may potentially be at risk of greater harm and require additional help and support. These may be children with a Child in Need or with a Child Protection Plan, those in Care or previously in Care or those requiring additional support. WUC work with Social Care and other appropriate agencies to ensure there is a joined-up approach to planning for these individuals and that they receive the right help at the right time.

Our University College understands that young people with special educational needs (SEN) and/or disabilities can face additional safeguarding challenges. Barriers can exist when recognising abuse and neglect in this group of young people.

These can include:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to their disability, without further exploration;
- That they may be more prone to peer group isolation than others;
- The potential to be disproportionately impacted by things like bullying, without outwardly showing signs;
- Communication difficulties in overcoming these barriers.

## **6 Procedures**

WUC works with key local partners to promote the welfare of young people and protect them from harm. This includes providing a co-ordinated offer of early help when additional needs are identified and contributing to inter-agency plans which provide additional support (for example through a Child in Need or a Child Protection plan).

All staff members have a duty to identify and respond to suspected/actual abuse or disclosures of abuse. Any member of staff, volunteer or visitor to the University College who receives a disclosure

or allegation of abuse, or suspects that abuse may have occurred **must** report it immediately to a member of the level 3 trained safeguarding team.

All action is taken in accordance with the following guidance:

- Essex Safeguarding Children Board guidelines - the SET (Southend, Essex and Thurrock) Child Protection Procedures (ESCB, 2019);
- Adult Safeguarding Board guidelines;
- [Essex Effective Support](#);
- Keeping Children Safe in Education (DfE, 2021);
- Working Together to Safeguard Children (DfE, 2018);
- 'Effective Support for Children and Families in Essex' (ESCB);
- PREVENT Duty - Counter-Terrorism and Security Act (HMG, 2015).

Where there is risk of immediate harm to a young person, concerns will be referred by telephone to the relevant Children and Families Hub (or equivalent in the Local Authority area in which they reside) and/or the Police. In Essex, this would involve calling 0345 6037627 and asking for the priority line in core office hours, or 0345 606 1212 out of hours. Less urgent concerns or requests for support will be sent to the Children and Families Hub via [Essex Effective Support](#) (or equivalent outside of Essex). WUC may also seek advice from Social Care or another appropriate agency about a concern, if unsure how to respond to it. For Essex residents, under 18, the Essex Children & Families Hub offers a consultation line available by calling 0345 603 7627 or emailing [Emergency.DutyTeamOutOfHours@essex.gov.uk](mailto:Emergency.DutyTeamOutOfHours@essex.gov.uk). Wherever possible for under 18s, we will share any safeguarding concerns, or an intention to refer a child to Children's Social Care, with parents or carers. However, we will not do so where it is felt that to do so could place a young person at greater risk of harm or impede a criminal investigation. If it is necessary for another agency to meet with a under 18 student at WUC, we will always seek to inform parents/carers, unless we are advised not to by that agency. On occasions, it may be necessary to consult with the Children and Families Hub and/ or Essex Police for advice on when to share information.

If a member of staff continues to have concerns about an individual and feels the situation is not being addressed or does not appear to be improving, all staff understand they should press for re-consideration of the case with the DSL.

Where the concern is related to an adult rather than an under 18, concerns would be reported via the appropriate adult safeguarding board. For Essex, Southend or Thurrock residents, contact details can be found here <https://www.essexsab.org.uk/professionals/reporting-concerns/>.

The DSL/DDSL will also decide when referrals need to be made in relation to Prevent and will ensure appropriate action is taken.

WUC's Safeguarding Team contact details are displayed around the University College to ensure that all staff members have access to safeguarding support and advice when required. Any individual may refer to Social Care where there is suspected or actual risk of harm to a child and should do so if there were exceptional circumstances that meant no member of the Safeguarding team were available at a critical point in time. The DSL/DDSL should always be updated in such circumstances.

When new staff, volunteers or regular visitors join our University College they are informed of the safeguarding arrangements in place, the names of the DSL and DDSL and all of the trained Safeguarding team and how to share concerns with them.

Confidentiality is an issue which needs to be discussed and fully understood by all those working with young people, particularly in the context of child protection. A member of staff must never guarantee confidentiality to anyone about a safeguarding concern. In accordance with statutory requirements, where there is a child protection concern, this must be reported to a member of WUC's Safeguarding team and may require further referral to and subsequent investigation by appropriate authorities.

Information on individual safeguarding cases may be shared by the DSL/DDSL with other relevant staff members. This will be on a 'need to know' basis only and where it is in the individuals best interests to do so.

WUC also understands the needs and circumstances under which to inform the Education and Skills Funding Agency (ESFA) in line with latest funding guidance.

## **7 Training**

In line with statutory requirements, the DSL/DDSL undertakes Level 3 child protection training at least every two years. At WUC, to support the work of the Lead and Deputy, there is a small team of staff members also trained to the same level.

WUC ensures that the DSL/DDSL also undertake training in inter-agency working and other relevant safeguarding matters, as appropriate.

All staff members and governors receive appropriate child protection training which is regularly updated and in line with advice from the Essex Safeguarding Children Board (ESCB). In addition, they receive safeguarding and child protection updates as required, but at least annually, to provide them with relevant skills and knowledge to safeguard effectively. Records of any safeguarding training undertaken are kept for staff and governors.

## **8 Records & Information Sharing**

Well-kept records are essential to good safeguarding practice. WUC is clear about the need to record any concern(s) held about a student at our University College and when these records should be shared with other agencies.

Where there are concerns about the safety of an individual, the sharing of information in a timely and effective manner between organisations can reduce the risk of harm. Whilst the Data Protection Act 2018 places duties on organisations and individuals to process personal information fairly and lawfully, it is not a barrier to sharing information where the failure to do so would result in a child or vulnerable adult being placed at risk of harm. Similarly, human rights concerns, such as respecting the right to a private and family life would not prevent sharing information where there are real



safeguarding concerns. Fears about sharing information cannot be allowed to stand in the way of the need to safeguard and promote the welfare of individuals at risk of abuse or neglect. Generic data flows related to safeguarding are recorded in our Records of Processing Activity and regularly reviewed. Our online University College privacy notices accurately reflect our use of data for safeguarding purposes.

Any member of staff receiving a disclosure of abuse or noticing signs or indicators of abuse, will record it as soon as possible, noting and dating what was said or seen. Relevant information will be added to safeguarding records, which will be dated and will include the action taken.

All concerns, discussions and decisions made and the reasons for those decisions will be recorded. Any records relating to safeguarding are kept on an individual file for that student (which is separate to the student file). All safeguarding records are stored securely and confidentially and will be retained for 15 years after the date the incident is reported.

WUC uses best endeavours to have any relevant previous child protection records transferred across to us once a student is enrolled. WUC is keen to work with previous education institutions to help ensure the smooth transition and planning for individual support needs.

## **9 Inter-Agency Working**

It is the responsibility of the DSL and DDSL to ensure that WUC is represented at, and that a report is submitted to, any statutory safeguarding meeting called for young people on the University College roll or previously known to them. Where possible and appropriate, any report will be shared in advance with the parent(s)/carer(s). The member of staff attending the meeting will be fully briefed on any issues or concerns the University College has and be prepared to contribute to the discussions.

If a young person is subject to a Care, Child Protection or a Child in Need plan, the DDSL will ensure there are arrangements in place to ensure that the child is monitored in terms of their University College attendance, emotional wellbeing, academic progress, welfare and presentation. If the University College is part of the core group, they will ensure the University College is represented, provides appropriate information and contributes to the plan at these meetings. Any concerns about the Child Protection plan and/or the young person's welfare will be discussed and recorded at the core group meeting, unless to do so would place them at further risk of significant harm. In this case the DDSL will inform the young person's key worker immediately and then record that they have done so and the actions agreed.

## **10 Allegations About Members of the Workforce**

All staff members are made aware of the boundaries of appropriate behaviour and conduct. These matters form part of staff induction and are outlined in the Staff Code of Conduct. The University College works in accordance with statutory guidance and the SET procedures (ESCB, 2019) in respect of allegations against an adult working with children (in a paid or voluntary capacity).

The University College has processes in place for reporting any concerns about a member of staff (or any adult working with children). Any concerns about the conduct of a member of staff must be referred to the Level 3 trained Safeguarding HR team member or DSL in the first instance. Where the allegation concerns an agency member of staff, they will liaise with the agency, while following due process.

Where the concern involves the Designated Safeguarding Lead, it should be reported direct to the Chair of P&R Committee (who is also WUC's Safeguarding Link Governor).

The SET procedures (ESCB, 2019) require that, where an allegation against a member of staff is received, the duty Local Authority Designated Officer (LADO) in the Children's Workforce Allegations Management Team on 03330 139 797 must be informed within one working day. However, wherever possible, contact with the LADO will be made immediately as they will then advise on how to proceed and whether the matter requires Police involvement.

Staffing matters are confidential and WUC operates within a statutory framework around Data Protection.

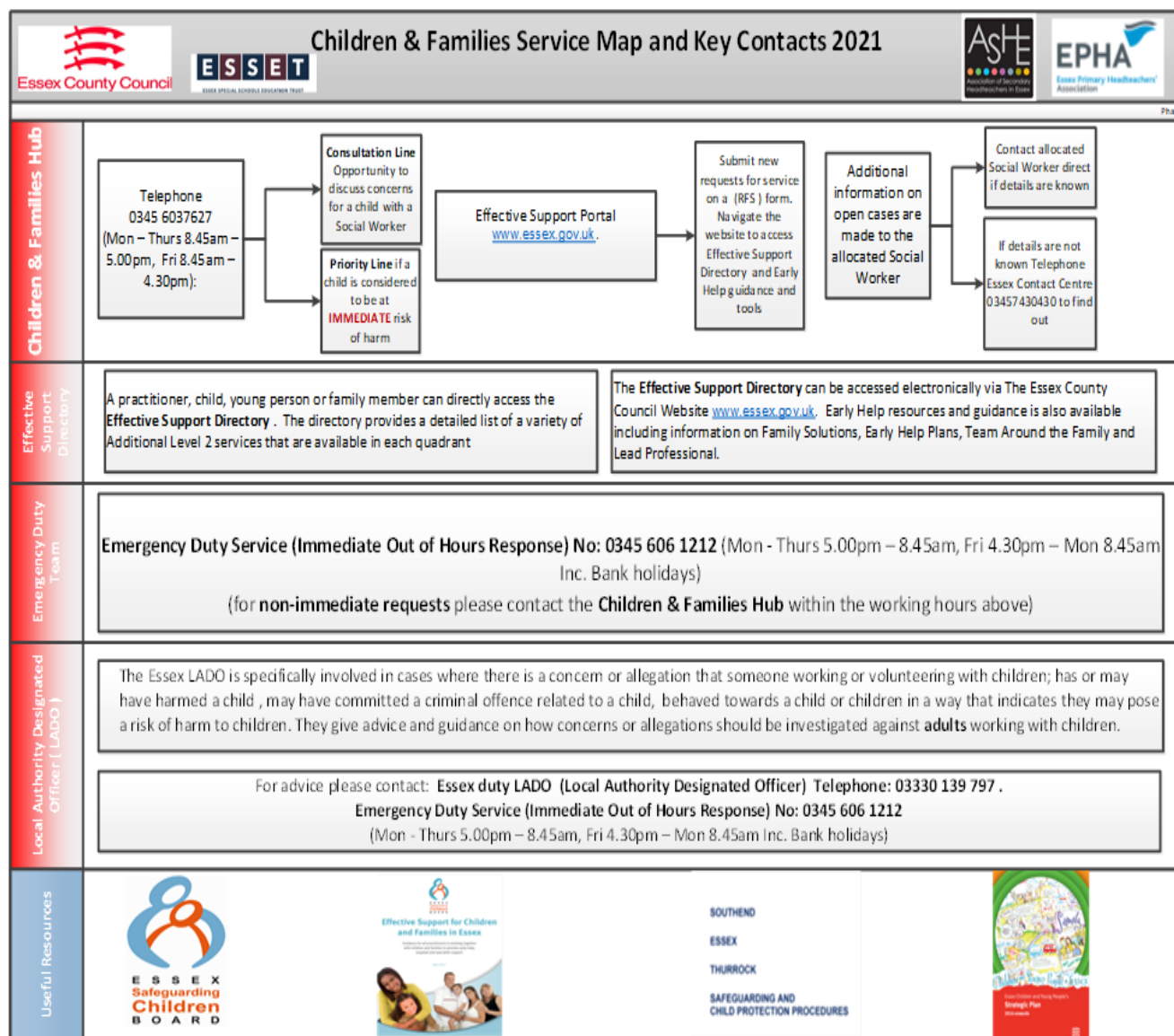
## **11 Use of Reasonable Force**

The term 'reasonable force' covers a broad range of actions used by staff that involve a degree of physical contact to control or restrain young people. There are circumstances when it is appropriate for staff to use reasonable force to safeguard individuals, such as guiding a young person(s) to safety or breaking up a fight. 'Reasonable' means using no more force than is needed and should be proportional to the consequences it is intended to prevent. WUC works in accordance with [statutory](#) and [local guidance](#) on the use of reasonable force and recognises that where intervention is required, it should always be considered in a safeguarding context.

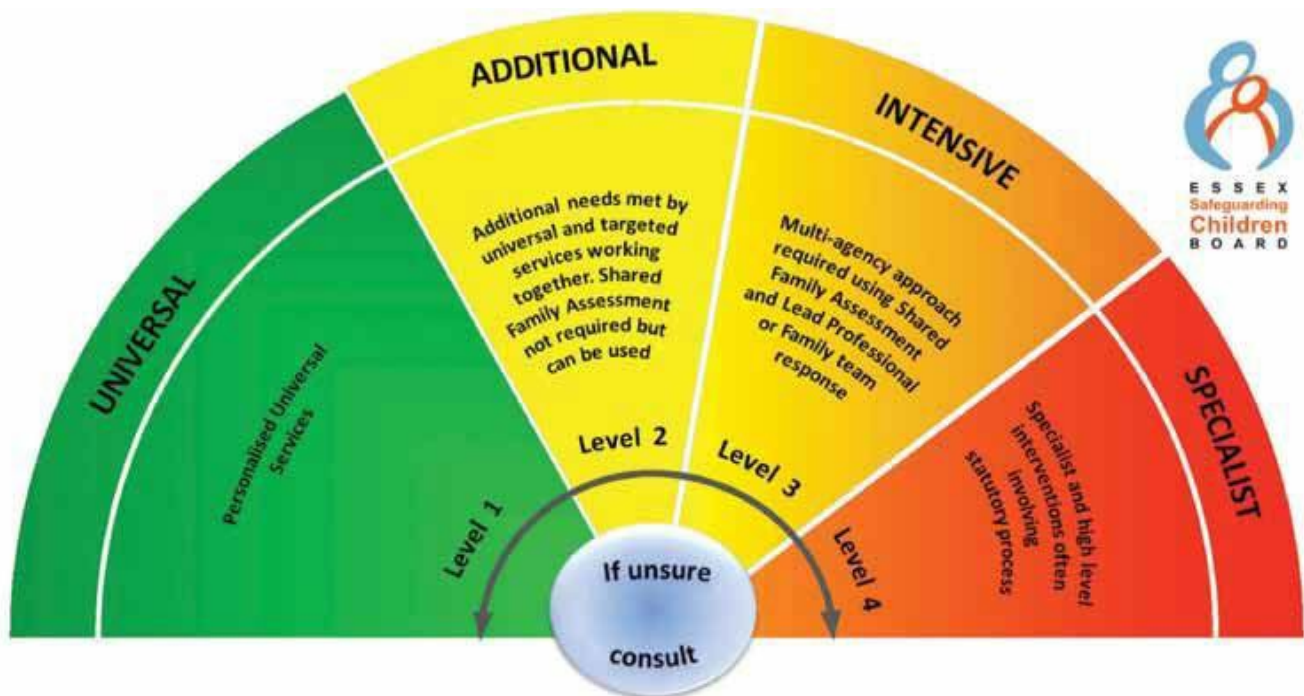
## **12 Whistleblowing**

All members of staff and the wider University College community should be able to raise concerns about poor or unsafe practice and feel confident any concern will be taken seriously by the University College leadership team. WUC have 'whistleblowing' procedures in place and these are available in the University College Whistleblowing Policy. However, for any member of staff who feels unable to raise concerns internally, or where they feel their concerns in relation to a child (under 18 year old) have not been addressed, they may contact the [NSPCC whistleblowing helpline](#) on: 0800 028 0285 (line is available from 8:00 AM to 8:00 PM, Monday to Friday) or by email at: [help@nspcc.org.uk](mailto:help@nspcc.org.uk).

## Appendix A: Children and Families Service Map and Key Contacts



## Appendix B: Essex Windscreen of Need and levels of intervention



All partners working with children, young people and their families will offer support as soon as we are aware of any additional needs. We will always seek to work together to provide support to children, young people and their families at the lowest level possible in accordance with their needs.

Children with Additional needs are best supported by those who already work with them, such as Family Hubs or education institutions, organising additional support with local partners as needed. When an agency is supporting these children, an Early Help Plan and a Lead Professional are helpful to share information and co-ordinate work alongside the child and family.

For children whose needs are Intensive, a coordinated multi-disciplinary approach is usually best, involving either an Early Help Plan or a Shared Family Assessment (SFA), with a Lead Professional to work closely with the child and family to ensure they receive all the support they require. Examples of intensive services are children's mental health services and Family Solutions.

Specialist services are where the needs of the child are so great that statutory and/or specialist intervention is required to keep them safe or to ensure their continued development. Examples of specialist services are Children's Social Care or Youth Offending Service. By working together effectively with children that have additional needs and by providing coordinated multi-disciplinary/agency support and services for those with intensive needs, we seek to prevent more children and young people requiring statutory interventions and reactive specialist services.

## Appendix C - Essex CSE Arrangements

### Essex Child Sexual Exploitation Arrangements

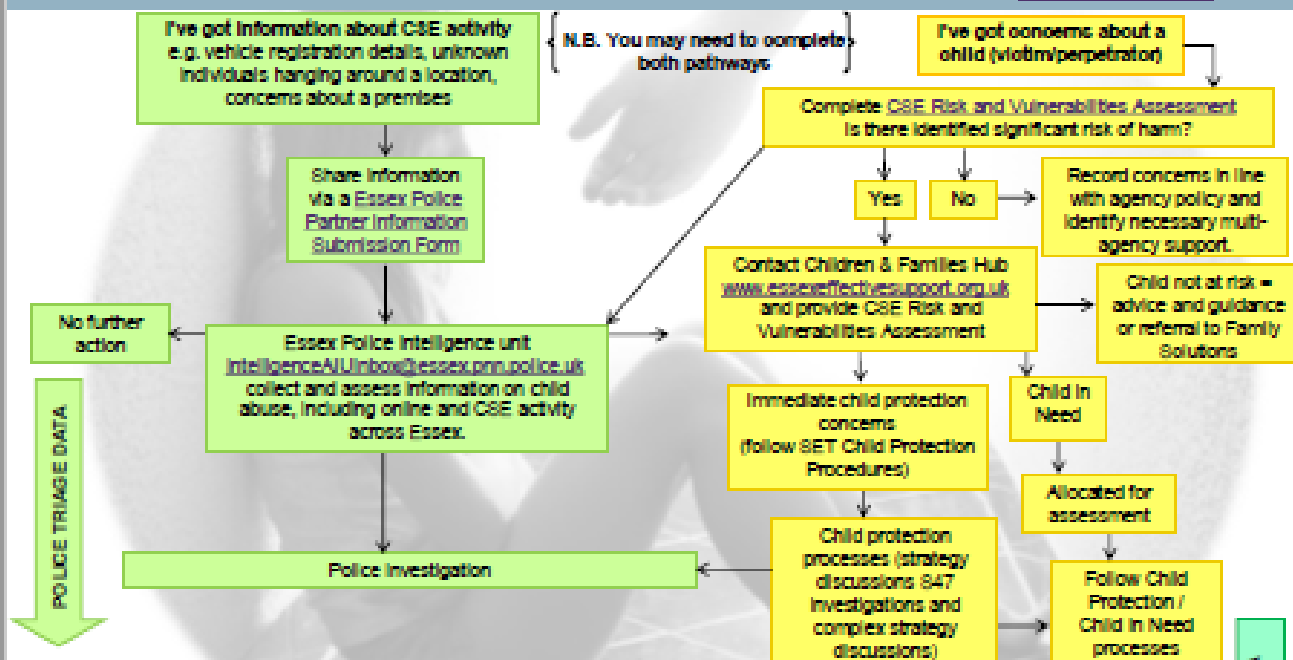
#### DEFINITION

Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology. (Home Office Definition for 2017)

#### INDICATORS OF CSE (For more information see SET CSE Risk and Vulnerabilities Assessment)

- ✦ You may notice a change in a young person's behaviour, they may be disruptive or hostile, and associating with older men or women.
- ✦ Their health or mental health might change, for example you may notice marks or scars which they try to conceal or increased health / sexual related problems.
- ✦ Their behaviour might change and you may notice them concealing their use of the internet, exclusion from school or unexplained absences and sexualised risk-taking, including on the internet or mobiles, or association with gangs.
- ✦ Their possessions may change including having unexplained amounts of money, credit, gifts, having multiple phones, sim cards and possession of hotel keys or keys to unknown premises.

FOR FURTHER INFORMATION REFER TO FULL ESSEX CSE & MISSING ARRANGEMENTS ON [WWW.ESCB.CO.UK](http://WWW.ESCB.CO.UK)



**CRITERIA FOR MACE:** Children and young people known to be being exploited, those who are considered our most vulnerable to CSE due to missing episode(s), children and young people assessed as HIGH RISK to exploitation (including sexual exploitation).

**Missing and Child Exploitation (MACE) Meetings** (A meeting held in 4 quadrants; Mid, North, South and West)

**MACE part 1 (monthly):** Focus on individual case discussion. Provides opportunity for multi-agency senior management oversight and comment for our most vulnerable young people, considers plans, further disruption opportunities and collection of evidence to support prosecutions.

**MACE part 2 (bi-monthly):** Considers wider operational activity necessary to tackle CSE threats through analysing local trends, patterns and hotspots. Responsible for building a local problem profile to better understand what threats exist locally and how these can be managed.

#### ESCB Child Exploitation & Missing Sub-Committee

This Sub-Committee oversees the statutory functions of local agencies to drive forward work across Essex around Child Exploitation and Missing. This multi-agency strategic group reports directly to the ESCB and it is responsible for overseeing a Multi-Agency Child Exploitation and Missing Action Plan.

#### District Councils (DC) & Community Safety Partnerships (CSP)

Local Councils have a range of functions such as housing, anti-social behaviour and nuisance, licensing, environmental health, which should all be considered in effectively tackling local threats of CSE. DC regulatory powers can be used to detect, disrupt, and in the collation of evidence, to support prosecutions. Each District has a CSP who has a statutory responsibility to develop and produce crime and disorder reduction strategies. CSPs can support in local community engagement, including supporting victims and their families and awareness raising projects. Representatives from DCs and CSPs attend quadrant MACE meetings.

#### Stay Safe Groups

Leads for Partnership Delivery attend quadrant MACE Part 2 meetings, this provides the mechanism for themes to be shared to support, training and develop the wider workforce.



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