

<b>Policy/procedure title</b>	Safeguarding, Child and Vulnerable Adult Protection Policy		
<b>Review Cycle</b> *Please specify	1 Year	<b>Responsible Department</b>	SMT
<b>Procedure Owner</b> *overall responsibility	Assistant Principal Student Services		
<b>Responsible Person</b> (if different to above) *responsibility for communicating changes and staff training where appropriate	Assistant Principal Student Services		
<b>Types of provision this procedure applies to:</b> (delete as appropriate)	14-16 Study Programmes 19+ Apprenticeships Higher Education		
<b>Revision Record</b>			
<b>Rev. No.</b>	<b>Date of Issue</b>	<b>Details and purpose of Revision:</b>	
01	Aug 2023	Updated to include changes to KCSiE	
02	May 2024	Incorporation of Safeguarding Reference Guide into the main policy, with the addition of appendices. Minor updates to various sections. Reformatting to CWA template, addition of contents page, hyperlinks etc	
03	Sept 2024	Updated to include changes to KCSiE 2024	

### Equality Impact Assessment

Whenever a policy is reviewed or changed, it's impact assessment also must be updated. The Equality Act 2010 seeks to simplify discrimination law and introduced statutory duties to promote equality whereby The College of West Anglia must, in the exercise of its functions, pay due regard to the need to promote equality in relation to the protected characteristics.

**Could any staff or students be adversely impacted by this policy/process? If yes give details and how this will be mitigated:**

<b>Date</b>	<b>Action and Monitoring:</b>
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<b>Oct 2023</b>	<b>No Actions</b>
<b>April 2024</b>	<b>No Actions</b>

**E, D & I Statement**

This procedure has been reviewed in line with the Equality Act 2010 which recognises the following categories of individual as Protected Characteristics: Age, Gender Reassignment., Marriage and Civil Partnership, Pregnancy and Maternity, Race, Religion and Belief, Sex (gender), Sexual Orientation and Disability. We will continue to monitor this procedure to ensure that it allows equal access and does not discriminate against any individual or group of people.

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## 1 Overview

The College of West Anglia (CWA) has a statutory and moral duty to safeguard and promote the welfare of all children, young people and vulnerable adults receiving education and training at the college. This policy has been developed and updated in line with statutory guidance [Keeping Children Safe in Education DfE \(2024\)](#) (KCSiE) and sets out how CWA discharges its statutory responsibilities relating to safeguarding, child and vulnerable adult protection. The policy applies to all staff, paid and unpaid, working at the college (a separate safeguarding policy covers Applewood Nursery).

This policy is available on the college website, staff intranet and is provided to all staff at induction alongside the staff Code of Conduct. In addition, all staff are provided with and required to read Part One of KCSiE annually.

Further guidance and information can be obtained from Paul O'Shea ([paul.oshea@cwa.ac.uk](mailto:paul.oshea@cwa.ac.uk)) or by emailing [safeguarding@cwa.ac.uk](mailto:safeguarding@cwa.ac.uk)

## 2 Introduction

### 2.1 Definitions

- Child: A person under the age of 18.
- Vulnerable adult: A person aged 18 or older who is, or may be, in need of community care services by reason of disability, age or illness; AND who is, or may be, unable to take care of or protect themselves against significant harm or exploitation.
- Safeguarding is:
  - Providing help and support to meet the needs of children as soon as problems emerge
  - Protecting children and vulnerable adults from maltreatment, whether that is within or outside the home, including online.
  - Preventing impairment of children's mental and physical health & development.
  - Ensuring children grow up in circumstances consistent with the provision of safe and effective care.
  - Taking action to enable children to have the best outcomes.

### 2.2 Our Ethos

CWA is committed to:

- providing a safe learning environment for all students.
- identifying children and vulnerable adults suffering, or likely to suffer, significant harm or abuse AND

- taking appropriate action to see that such children and vulnerable adults are kept safe, both at home and at college.

Through their day-to-day contact with students and their families, CWA staff have a crucial role to play in noticing indicators of possible abuse, neglect and exploitation and referring them to the safeguarding team for assessment and possible referral to social Services.

See [APPENDIX 1: Types of Abuse](#) for descriptions of the main types of abuse of children and vulnerable adults.

We recognise that high self-esteem, confidence, supportive friends and good lines of communication with a trusted adult help to protect children/vulnerable adults from abuse and harm.

The college will therefore:

- establish and maintain an ethos where students feel secure and are encouraged to talk and are listened to.
- ensure students know that there are adults in the college whom they can approach if they are worried, in difficulty or wish to report a concern.
- ensure there are well-promoted and easily understood systems in place for students to confidently report abuse, knowing their concerns will be treated seriously.
- include in the curriculum activities and /or tutorial opportunities which equip students with the skills they need to stay safe from abuse, radicalisation and other safeguarding risks, and with information about who to turn to for help.
- include in the curriculum and/or tutorial materials which will help students develop realistic attitudes to the responsibilities of adult life.

We recognise that our teaching and support staff play a particularly important role as they are in a position to identify concerns early and provide help for children to prevent concerns from escalating. All staff are advised to maintain an attitude of 'it could happen here' where safeguarding is concerned. When concerned about the welfare of a child, staff members must always act in the best interests of the child.

All staff and regular visitors will, through training and induction, know how to recognise indicators of concern, how to respond to a disclosure from a child and how to record and report this information. We will not make promises to any child and we will not keep secrets. Every child will know what the adult will have to do with any information they have chosen to disclose. The safeguarding team will always take into account the wishes and feelings of the student when determining what action to take in relation to a concern. Staff training will take account of

the fact that children may not recognise or feel ready to disclose they are being abused, exploited or neglected.

At all times we will work in partnership and endeavour to establish effective working relationships with parents, carers and colleagues from other agencies in line with Working Together to Safeguard Children (2023) and local authority safeguarding children board procedures.

As part of our responsibilities for safeguarding and promoting the welfare of children and vulnerable adults, we will provide a co-ordinated offer of early help when additional needs are identified. These may include if the child / vulnerable adult:

- is disabled and has specific additional needs;
- has special educational needs (whether or not they have a statutory education, health and care plan);
- is a young carer;
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups;
- is frequently missing/goes missing from education, care or from home;
- is misusing drugs or alcohol themselves;
- is at risk of modern slavery, trafficking or exploitation;
- is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health problems or domestic abuse;
- has returned home to their family from care;
- is showing early signs of abuse and/or neglect;
- is at risk of being radicalised or exploited;
- is at risk of honour-based abuse such as female genital mutilation or forced marriage;
- has a family member in prison, or is affected by parental offending;

The college will endeavour to provide early help support in a variety of ways, including:

- support from internal pastoral services (safeguarding, mental health and counselling staff) and relevant curriculum staff
- liaison with external agencies such as Social Services, Child and Adolescent Mental Health Services, Early Help services and other specialist third sector services
- fostering productive and supportive relationships with parents

The college understands the importance of working in a way that adheres to the following legislation: Human Rights Act (1998); Equality Act (2010); Public Sector Equality Duty. This means we do not unlawfully discriminate against students because of their sex, race, disability, religion or belief, gender reassignment, pregnancy and maternity, or sexual orientation (protected characteristics)

## 3 Roles and Responsibilities

### 3.1 Governing Body

The governing body fully recognises its responsibilities with regard to child protection and vulnerable adults and to safeguarding and promoting the welfare of children and vulnerable adults.

It will:

- designate a governor for safeguarding who will monitor the college's compliance with Safeguarding Child/Vulnerable Adult Protection Policy and practice, and who will champion safeguarding issues, including statutory responsibilities under the Prevent Duty.
- ensure an annual report is made to the governing body on safeguarding matters to include changes affecting safeguarding & child protection policy and procedures, safeguarding & child protection training, and an analysis of safeguarding incidents/cases recorded during the academic year.
- ensure a member of staff from the college leadership team is designated to take the lead responsibility for safeguarding and child protection and that there is at least one deputy who is appropriately trained to deal with any issues in the absence of the Designated Safeguarding Lead (DSL).
- Ensure the college leadership fulfils its responsibilities to have appropriate filtering and monitoring systems and processes in place.
- ensure procedures are in place for dealing with allegations against members of staff and volunteers in line with statutory guidance.
- safer recruitment practices are followed in accordance with the requirements of KCSiE.
- ensure that this policy is annually reviewed and updated.
- ensure governors receive appropriate safeguarding training at induction and that this is updated regularly.



## 3.2 CWA Management

The college will:

- ensure it has a designated senior member of staff, who has undertaken, as a minimum, the appropriate training for Designated Safeguarding Leads (DSL) run by local authorities.
- ensure this training is updated every two years in accordance with government guidance.
- recognise the importance of the role of the designated person and ensure they have the time and training to undertake their duties.
- ensure designated members of staff are trained to DSL level to enable them to deputise for the DSL, act as Designated Safeguarding Officers (DSO) who can manage safeguarding concerns, make referrals, support staff and students, and liaise with the DSL in decision-making and record-keeping.
- provide all staff with safeguarding training relevant to their duties and in line with requirements set out in KCSiE.
- ensure that DSOs will take relevant professional advice (e.g. local authority services) when managing complex cases.

## 3.3 Designated Safeguarding Lead (DSL)

The DSL is a member of the college senior leadership team and takes lead responsibility for safeguarding and child & vulnerable adult protection at CWA, including fulfilling our duties under the Prevent agenda.

The DSL will carry out their role in accordance with the responsibilities outlined in Annex C of KCSiE and will:

- provide support and advice to other staff on safeguarding and child protection matters.
- ensure effective safeguarding reporting and case management procedures are in place.
- ensure the college maintains written records and child protection files which are kept confidential and stored securely.
- Represent CWA (or appoint a deputy from the group of DSOs) at child protection conferences, core group meetings and other multi-agency meetings in relation to safeguarding cases.
- Liaise with local authorities, police and counter-terrorism in relation to radicalisation and Prevent concerns.
- Ensure appropriate filtering and monitoring systems and processes are in place and reviewed annually in line with DfE filtering and monitoring standards.

### 3.4 Designated Safeguarding Officers (DSO)

DSOs include the student welfare manager, the student welfare team as well as selected members of the college management team. The DSO supports and deputises for the DSL in the management of safeguarding cases across the college and undertakes the statutory training for DSLs. CWA has a team of DSOs to ensure sufficient resource to cover all campuses and provision, including apprenticeships and sub-contracted delivery.

### 3.5 Partnership Providers

CWA requires each of its sub-contracted partnership providers to have appropriate safeguarding policies and procedures in place, ensuring they comply with instructions and guidance as specified in the most recent version of KCSiE and relevant local authority processes. Partners must also have due regard for and comply with CWA safeguarding requirements. The CWA head of employer liaison, partnerships and commercial training is responsible for checking partnership compliance.

## 4 Procedures for Managing Concerns

Working to the guidelines and requirements of KCSiE and *Working Together to Safeguard Children (2023)*, CWA will follow child and vulnerable adult protection procedures of the relevant local authority (this will usually be Norfolk, Cambridgeshire or Lincolnshire).

All staff are encouraged to report any concerns they have and not see these as insignificant. On occasions, a referral is justified by a single incident such as disclosure of abuse. More often, however, concerns accumulate over a period of time and are evidenced by building up a picture of harm over time; this is particularly true in cases of emotional abuse and neglect. In these circumstances, it is crucial that staff record and pass on concerns immediately in accordance with this policy to allow the safeguarding team to build up a picture and access support for the child or vulnerable adult at the earliest opportunity. A reliance on memory without accurate and contemporaneous records of concern could lead to a failure to protect.

We recognise that safeguarding incidents and/or behaviours can be associated with factors outside of the college environment and/or can occur between young people outside college. This is known as contextual safeguarding. All staff should be aware of this so that when reporting concerns, they include as much information and background detail as possible to provide a holistic view of the child, which will allow any assessment to consider all available evidence and the full context of any abuse.

All concerns must be reported to a DSO via the agreed channels. See [Appendix 2: Reporting And Managing Concerns](#).

Concerns will be triaged and managed by a DSO (in liaison with the DSL, where necessary). Where a referral to social services is appropriate, this will be done by a DSO using the relevant local authority procedures.

Staff should always follow the agreed CWA reporting procedures in the first instance. However, they may also share information directly with Children's Services or the police if:

- the situation is an emergency and the DSL, a DSO or a member of senior management are all unavailable.
- they are convinced that a direct report is the only way to ensure the student's safety.

Any member of staff who does not feel that concerns about a child have been responded to appropriately and in accordance with the procedures outlined in this policy should raise their concerns with the principal or chair of governors. If any member of staff does not feel the situation has been addressed appropriately at this point, they should contact Children's Services directly with their concerns.

## 5 Liaison with Other Agencies

The college will:

- work to develop effective links with relevant agencies and co-operate as required with their enquiries regarding child / vulnerable adult protection matters including attendance and written reports at child protection conferences and core group meetings.
- notify the relevant Social Services team if:
  - it should have to exclude or suspend a student who is subject to a child protection plan.
  - there is an unexplained absence of a student who is subject to a child protection plan of more than two days duration from college (or one day following a weekend); or as agreed as part of any child protection plan or core group plan.

CWA works in partnership with Norfolk Constabulary and Norfolk Children's Services to identify and provide appropriate support to students who have experienced domestic violence in their household; this scheme is called Operation Encompass. In order to achieve this, Norfolk Multi-Agency Safeguarding Hub will share police information of all domestic incidents where one of our students has been present with the CWA safeguarding team, who will decide on any appropriate action and support. All information sharing and resulting actions will be undertaken in accordance with the 'Norfolk Joint Agency Protocol for Domestic Abuse – Notifications to Schools'. We will record and store this information in accordance with our safeguarding record-keeping procedures.

## 6 Record Keeping & Information Sharing

The college will:

- keep clear detailed written records of concerns about students (noting the date, event and action taken), even where there is no referral to Social Services.
- ensure all records are kept secure, with any paper records kept in locked locations with restricted access.
- ensure safeguarding information will only be shared with staff on the basis of 'need to know in the child's interests' and on the understanding that it remains strictly confidential.
- Share information with statutory and other external agencies appropriately and proportionately in order to safeguard a child or vulnerable adult's welfare.
- ensure all relevant child protection records are sent to the receiving school or college or establishment when a student moves/transfers/progresses.

## 7 Communication with Parents

The college will undertake appropriate discussion with parents / carers prior to involvement of another agency unless the circumstances preclude this action.

## 8 Specific Safeguarding Issues

There are a number of specific safeguarding issues or themes that schools and colleges must be aware and take account of. This section sets out our approach to some of the most important of these, followed by links to further information on the complete list of current main specific safeguarding issues in England as identified by the government.

### 8.1 Children and vulnerable adults with special educational needs and disabilities

We recognise that children and vulnerable adults with special educational needs and /or disabilities (SEND) can face additional safeguarding challenges, which will be reflected in the higher levels of support available for these students. These additional barriers can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration.
- these children being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children.
- children with SEND can be disproportionately impacted by things like bullying, without outwardly showing any signs.
- communication barriers and difficulties in overcoming these barriers.

## 8.2 Child-on-child Abuse

We recognise that children are also vulnerable to physical, sexual and emotional abuse by their peers or siblings. We also recognise that with such abuse, girls are far more likely to be the victims and boys the perpetrators.

Child-on-child abuse can take different forms, including but not limited to:

- all forms of bullying (including cyberbullying, physical and emotional bullying).
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm.
- sexual violence and sexual harassment.
- non-consensual sharing of nude images (formerly referred to as sexting).
- initiation/hazing type violence and rituals.

Abuse perpetrated by children can be just as harmful as that perpetrated by an adult and such abuse will always be taken as seriously as abuse perpetrated by an adult and the same safeguarding procedures will apply in respect of any child who is suffering or likely to suffer significant harm.

Staff must never tolerate or dismiss concerns relating to child-on-child abuse; it must never be tolerated or passed off as 'banter', 'just having a laugh' or 'part of growing up'. Doing this can lead to a culture of unacceptable behaviours, an unsafe environment for children and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it.

Staff will reassure victims that they are being taken seriously, will be supported and kept safe. Victims will never be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment. Nor will a victim ever be made to feel ashamed for making a report.

All staff will understand that they should follow our safeguarding procedures for reporting a concern if they are worried about child-on-child abuse. The DSL & DSOs will respond to any concerns related to child-on-child abuse in line with guidance outlined in Part five of KCSiE. We will ensure that all concerns, discussions and decisions reached are clearly recorded and any identified actions are followed up.

### 8.3 Children Missing or Persistently Absent from Education

Children missing from education, particularly on a persistent basis, can act as a vital warning sign to a range of safeguarding issues including neglect, sexual abuse, and child sexual and criminal exploitation. At CWA, we will ensure that:

- all staff are aware of the need to report absences promptly using the central absence management system.
- all unknown / unexplained absences are followed up promptly, involving parents and carers for students aged under 18.
- Specific arrangements are in place to monitor the attendance of individual students identified as being at high risk (e.g. child criminal or sexual exploitation) and for those under the care of the local authority or with a child protection plan.

### 8.4 Preventing Radicalisation and Extremism

We recognise that safeguarding against radicalisation and extremism is no different to safeguarding against any other vulnerability in today's society. At CWA, we will ensure that:

- through training, staff, volunteers and governors have an understanding of what radicalisation and extremism is, why we need to be vigilant in school and how to respond when concerns arise.
- there are systems in place for keeping students and staff safe from online extremist material via our IT network by using effective filtering, monitoring and usage policies.
- the DSL or DSOs will make referrals in accordance with local authority procedures and will represent CWA at Channel meetings, if required.
- the DSL has received Prevent training and will act as the point of contact within our college for any concerns relating to radicalisation and extremism.
- our curriculum & tutorial system provide opportunities to raise awareness and educate students about the dangers and signs of radicalisation and what to do if they have concerns.

### 8.5 Online Safety

The use of technology has become a significant component of many safeguarding issues, including bullying, child sexual exploitation, sexual predation, radicalisation etc. Technology often provides the platform that facilitates harm.

The breadth of issues classified within online safety is considerable, but can be classified into four areas of risk:

- Content: being exposed to illegal, inappropriate or harmful material.
- Contact: being subjected to harmful online interaction with other users..
- Conduct: personal online behaviour that increases the likelihood of, or causes, harm.
- Commerce: risks such as online gambling, inappropriate advertising, phishing and or financial scams.

The college has a responsibility to protect children from these risks and has a range of systems and processes in place to filter harmful and illegal content and monitor online activity.

These systems and processes are reviewed regularly in line with current government filtering and monitoring standards. CWA also holds certification for Cyber Essentials Plus, the government-backed scheme to protect organisations against cyber attacks.

The college's tutorial framework provides a wide range of materials and resources for teaching staff to help students develop their awareness and understanding of how to keep themselves safe online.

Concerns related to student online safety are managed by the safeguarding and welfare team, who liaise with external organisations and provide support and guidance for students.

#### 8.6 Further information on specific safeguarding issues

In addition to the above, the list below covers current main specific safeguarding issues in England as identified by the government. Expert and professional organisations are best placed to provide up-to-date guidance and practical support on these but there is also a wealth of useful information available online. For example, NSPCC offers information for schools and colleges on its website [www.nspcc.org.uk](http://www.nspcc.org.uk) and schools and colleges can also access broad government guidance on the issues listed below via [www.gov.uk](http://www.gov.uk). Clicking on the link below will take you to government guidance related to the topic.

<a href="#">Child sexual exploitation (CSE)</a>	<a href="#">Child criminal exploitation (CCE) &amp; County Lines</a>
<a href="#">Bullying including cyber bullying</a>	<a href="#">Domestic violence</a>
<a href="#">Drugs and substance abuse</a>	<a href="#">Fabricated or induced illness</a>
<a href="#">Female genital mutilation (FGM)</a>	<a href="#">Forced marriage</a>
<a href="#">Gangs and youth violence</a>	<a href="#">Human trafficking and modern slavery</a>
<a href="#">Mental health</a>	<a href="#">Private fostering</a>
<a href="#">Radicalisation (PREVENT)</a>	<a href="#">Sharing nude and semi-nude images &amp; videos</a>

## 9 Preventing Unsuitable People from Working with Students

The college will operate safe recruitment practices including ensuring appropriate Disclosure and Barring Service (DBS) and reference checks are undertaken in accordance with KCSiE. Managers will complete appropriate safer recruitment training and at least one person involved in conducting interviews when recruiting staff will have completed safer recruitment training.

The college will consult with the Local Authority Designated Officer (LADO) in the event of an allegation of abuse being made against a member of staff (including volunteers and agency staff) and adhere to the relevant the relevant local authority procedures in accordance with KCSiE.

The college will ensure that any disciplinary proceedings against staff relating to safeguarding matters are concluded in full even when the member of staff is no longer employed at the college and that notification of any concerns is made to the relevant authorities and professional bodies and included in references where applicable.

See [APPENDIX 3: Dealing With Allegations Against Members Of Staff](#) for details of the procedures for dealing with allegations (including low level concerns that do not meet the threshold of harm) of abuse against a member of staff.

The college will ensure that all staff, paid and unpaid, are aware of the need to maintain appropriate and professional boundaries in their relationships with students and parents, and will adhere to the relevant requirements in the Staff Code of Conduct.

The college will ensure that staff and volunteers are aware that sexual relationships with students aged under 18 are unlawful and could result in legal proceedings taken against them under the Sexual Offences Act 2003 (Abuse of trust). Staff who work within a college have a duty of care to model appropriate social behaviours and to ensure that the professional role of trust is not abused.

## 10 Use of Premises for Non-College Activities

Where we hire or rent out our facilities/premises to organisations or individuals external to CWA we ensure that appropriate arrangements are in place to keep children safe.

Where relevant, we will seek assurances that the body concerned has appropriate safeguarding policies and procedures in place (including inspecting these as needed). Safeguarding requirements are included in any transfer of control agreement (i.e. lease or hire agreement), as



a condition of use and occupation of the premises; failure to comply with this would lead to termination of the agreement.

Any safeguarding allegations received relating to an incident that happened when an individual or organisation was using CWA premises for the purposes of running an activity for children will be dealt with according to CWA safeguarding protocols and procedures.

## 11 Other Related Policies

### 11.1 Staff Code of Conduct & Governor Code of Conduct

These set out the professional standards required of CWA staff and governors and includes specific references to our expectations around staff behaviour and communication with students.

### 11.2 Health and Safety

Our health and safety policy is set out in a separate document and is reviewed annually. It reflects the consideration we give to the protection of our children and vulnerable adults both within the college environment and when away from the college when undertaking college trips and visits.

### 11.3 E-Safety, Acceptable Use & Filtering and Monitoring

Our policies on e-safety, acceptable use of IT, and filtering and monitoring are set out in a separate document and are reviewed annually. They reflect the balance needed between the exciting opportunities offered by the internet and other technologies and the need for students and staff to keep themselves safe and deal sensibly with risk.

### 11.4 External Speaker Policy

This sets out CWA's expectations for staff and students when considering the use of external speakers and organisations at CWA events on and off campus and online.

## APPENDIX 1: Main Types of Abuse

There are four main categories of abuse (described below) related to safeguarding of children: Physical, Emotional, Sexual, Neglect.

Additional categories of abuse (described below) more likely to affect vulnerable adults include: Financial or Material, Organisational/Institutional, Domestic, Discriminatory, Self-neglect.

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

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

It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning or preventing the child from participating in normal social interaction.

It may also involve seeing, hearing or experience the effects of the ill-treatment of another (especially in the case of domestic abuse), serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

**Sexual abuse:** involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving violence, whether or not the child is aware of what is happening.

The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse.

Sexual abuse can take place online, and technology can be used to facilitate offline abuse.

Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

**Neglect:** the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development.

Neglect may occur during pregnancy, for example, as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of

inadequate caregivers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

**Financial or Material:** This includes theft, fraud, exploitation, internet scamming, pressure/ coercion in connection with a person's financial affairs or arrangements including wills, property inheritance or financial transactions or the misappropriation of property, possessions or benefits.

It also includes the withholding of money or the unauthorised or improper use of a person's money or property, usually to the disadvantage of the person to whom it belongs.

**Organisational/Institutional:** the mistreatment, abuse or neglect of a person by a regime or individuals in a setting or service where the person lives or that they use. Such abuse violates the person's dignity and represents a lack of respect for their human rights.

Organisational abuse occurs when the routines, systems and regimes of an organisation result in poor or inadequate standards of care and poor practice which affect the whole setting and deny, restrict or curtail the dignity, privacy, choice, independence or fulfilment of adults.

Organisational abuse can occur in any setting providing health or social care.

**Domestic:** It is the behaviour of one person towards another where both people are aged 16 or over and are personally connected to each other, and the behaviour is abusive. Behaviour is defined as abusive if it consists of any of the following: physical or sexual abuse; violent or threatening behaviour; controlling or coercive behaviour; economic abuse; psychological, emotional or other abuse.

It does not make any difference whether the behaviour is a single incident or consists of a number of incidents over a period of time.

Economic abuse is any behaviour by a person that negatively impacts the other person's ability to: obtain, use or maintain money or other property (such as a mobile phone or car and also include pets); buy goods or services (for example utilities such as heating, or food and clothing).

Domestic abuse also includes so called 'honour' based abuse, forced marriage and female genital mutilation.

**Discriminatory:** This includes discrimination on the grounds of race, faith or religion, age, disability, gender, sexual orientation and political views, along with racist, sexist, homophobic or ageist comments or jokes, or comments and jokes based on a person's disability or any other form of harassment. It also includes not responding to dietary needs and not providing

appropriate spiritual support. Excluding a person from activities on the basis they are 'not liked' is also discriminatory abuse.

**Self-neglect:** This includes a wide range of behaviour that threatens the person's own health and/or safety and is linked to a lack of mental capacity. It may include failure to on the part of the person to provide themselves with adequate food, water, clothing and shelter. It may mean neglecting to care for one's personal health, hygiene or surroundings, including hoarding, taking adequate safety precautions and the misuse of drugs and alcohol. Self-neglect differs from other types of abuse in that there is no third party involved.

## APPENDIX 2: Reporting And Managing Concerns

### 2.1 Responding to a Disclosure

#### **Do:**

- React calmly, listen carefully, reassure and observe.
- Take it seriously.
- Record the conversation in the young person's words.
- Note the time, sign and date the record you make.
- Explain to the young person what will happen next:
  - Explain that you will have to report it to a member of the safeguarding team.
  - the safeguarding officer will assess the situation and decide who else may need to be informed and what action to take next.
  - Explain that they will usually be informed before any further action is taken.
- Pass on your concern to a safeguarding officer.
- Avoid promises you are not certain you can keep.

#### **Don't:**

- Interrogate the student or ask leading questions.
- Jump to conclusions, speculate or accuse anyone.
- Promise absolute confidentiality.

## 2.2 Recording and Reporting Concerns

- Make a record of all information and their concerns.
- Include 'nagging doubts' and 'hearsay'.
- Report the concern via one or more of the following channels:
  - Email to [safeguarding@cwa.ac.uk](mailto:safeguarding@cwa.ac.uk)
  - Telephone: 01553 815265 (internal extension 2265)
  - In person to a member of the Safeguarding Team (See [APPENDIX 4: Contact Details](#))

**If the student is at risk of immediate harm or unable to keep themselves safe, do not leave them alone. Contact the safeguarding team on ext. 2265 for immediate support/advice. If there is an immediate threat to life or serious harm, call 999.**

## 2.3 Recording a Concern

Details of your concern should include the following:

- Date of the incident and date and time of the record being made
- Name and date of birth of the young person concerned
- A factual account of what happened (verbatim reports from the individual if possible)
- A note of any other people involved e.g. as witnesses
- Action taken and any further plans e.g. monitor and review
- Name, job title and signature (if not electronically recorded) of the person making the record

## 2.4 Assessing and Managing Concerns

All reported concerns are assessed by a DSO and staff will receive notification when this has happened.

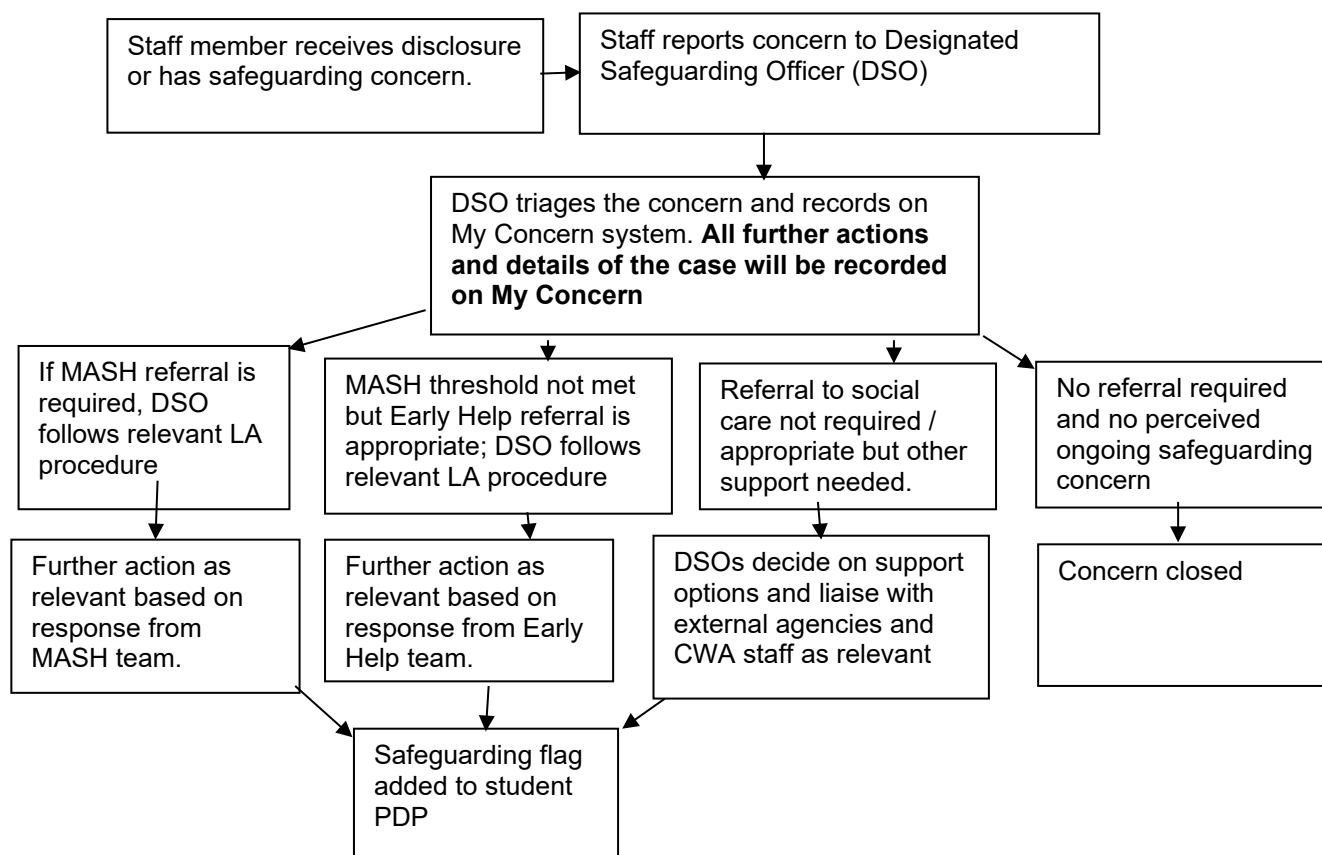
CWA uses My Concern to record and manage all safeguarding concerns. My Concern is an online safeguarding reporting and managing system. All concerns are recorded and managed by DSO team using this system.

The DSO will decide on next steps, which may include referral to external services. The DSO will decide who else needs to be informed and what action needs to happen.

All further action, information and correspondence will be recorded on the secure My Concern system, even if it is decided there is no ongoing safeguarding concern.

Where there is an ongoing safeguarding concern, a safeguarding flag will be put on the student's PDP.

## 2.5 Flow chart summarising outline process to be followed in the event of a safeguarding concern or disclosure.



**CWA Safeguarding reporting channels:** email – [safeguarding@cwa.ac.uk](mailto:safeguarding@cwa.ac.uk); telephone – 01553 815265 (ex 2265); face to face (see [APPENDIX 4: Contact Details](#))

**Norfolk Children’s Advice & Duty (CADS) team:** Phone: 0344 800 8021

**Cambs MASH team:** Phone: 0345 045 1362 (office hours); 01733 234724 (emergency duty team out of hours)

**Lincolnshire MASH team:** Phone: 01522 782111 (office hours); 01522 782333 (emergency team out of hours)

**Police:** 101 and select the relevant county; 999 for all emergencies

## APPENDIX 3: Dealing with Allegations Against Members of Staff

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

In rare instances, staff of education institutions have been found responsible for child abuse or other serious safeguarding concerns. Because of their frequent contact with children and young people, staff may have allegations of child abuse made against them. CWA recognises that an allegation of child abuse made against a member of staff may be made for a variety of reasons and that the facts of the allegation may or may not be true. It is imperative that those dealing with an allegation maintain an open mind and that investigations are thorough and not subject to delay.

CWA recognises that the law states that the welfare of the child or young person is the paramount concern. It is also recognised that hasty or ill-informed decisions in connection with a member of staff can irreparably damage an individual's reputation, confidence and career. Therefore, those dealing with such allegations within the college will do so with sensitivity and will act in a careful, measured way.

### 3.1 Receiving an Allegation from a Child or Young Person

A member of staff who receives an allegation about another member of staff from a child or young person should follow the guidelines below for dealing with disclosure.

The allegation should be reported within 24 hours to the Principal, DSL or Head of Human Resources unless the Principal, DSL or Head of Human Resources is the person against whom the allegation is made, in which case the report should be made to one of the other two. The senior person receiving the report should:

- Obtain written details of the allegation from the person who received it, that are signed and dated. The written details should be countersigned and dated by the Principal (or designated person).
- Record information about times, dates, locations and names of potential witnesses.

### 3.2 Initial Assessment by the Principal (or designated person)

The Principal or designated person should make an initial assessment of the allegation, consulting with the DSL, the Head of Human Resources and the LADO as appropriate. Where the allegation is considered to be either a potential criminal act or indicates that the young person/vulnerable adult has suffered, is suffering or is likely to suffer significant harm, the matter should be reported immediately to the LADO.

It is important that the Principal does not investigate the allegation. The initial assessment should be on the basis of the information received and is a decision whether or not the allegation warrants further investigation.



### 3.3 Low-level Concerns and Allegations that Do Not Meet the Threshold of Harm

All concerns and allegations about the behaviour of a member of staff towards a child must be reported, recorded and investigated. Such concerns may be raised by a child, parent, other member of staff or an external party and may be considered low level.

A low-level concern is any concern that an adult has acted in a way that:

- Is inconsistent with the staff code of conduct, including inappropriate conduct outside of work.
- Does not meet the allegations threshold or is not considered serious enough to refer to the LADO.

Examples of low-level concerns could include:

- Being over friendly with students
- Using inappropriate (e.g. discriminatory, abusive etc) language with students
- Having favourites
- Taking photos of students on their mobile phone
- Engaging with students on social media in a personal capacity

Low level concerns about staff should be reported via the usual safeguarding reporting channels.

### 3.4 Enquiries and Investigations

Child protection enquiries by social services or the police are not to be confused with internal disciplinary enquiries by the College. CWA may be able to use the outcome of external agency enquiries as part of its own procedures. The child protection agencies, including the police, have no power to direct CWA to act in a particular way; however, the College should assist the agencies with their enquiries.

CWA may hold in abeyance its own internal enquiries while the formal police or social services investigations proceed; to do otherwise may prejudice the investigation. This will be decided in conjunction with relevant external agencies (e.g., LADO, police). Any internal enquiries shall conform with the existing staff disciplinary procedures.

If there is an investigation by an external agency, for example the police, the Principal, Head of Human Resources or DSL, should normally be involved in, and contribute to, the inter-agency strategy discussions. The Principal, DSL, Head of Human Resources or designated person is

responsible for ensuring that CWA gives every assistance with the agency's enquiries. They will ensure that appropriate confidentiality is maintained in connection with the enquiries, in the interests of the member of staff about whom the allegation is made. The Principal, DSL, Head of Human Resources or designated person shall advise the member of staff that they should consult with a representative, for example, a trade union.

Subject to objections from the police or other investigating agency, the Principal (or designated person) shall:

- Inform the child/children, young person(s) or parent/carer making the allegation that the investigation is taking place and what the likely process will involve
- Ensure that the parents/carers of the child, young person or adults making the allegation have been informed that the allegation has been made and what the likely process will involve
- Inform the member of staff against whom the allegation was made of the fact that the investigation is taking place and what the likely process will involve
- Inform the Chair of Governors of the allegation and the investigation.

The Principal, Designated Safeguarding Lead, Head of Human Resources or designated person shall keep a written record of the action taken in connection with the allegation.

Suspension and disciplinary investigations are dealt with under CWA's Staff Disciplinary procedure.

Where staff have been suspended, they will be offered support and counselling, should they wish to receive this.

### 3.5 The Disciplinary Investigation

The disciplinary investigation will be conducted in accordance with the existing staff disciplinary procedures.

The member of staff should be informed of:

- The disciplinary charge against them
- Their entitlement to be accompanied or represented by a trade union representative or friend

Where the member of staff has been suspended and no disciplinary action is to be taken, the suspension should be lifted and arrangements made for the member of staff to return to work. It may be appropriate to offer counselling.

The young person/vulnerable adult(s) making the allegation and/or their parents should be informed of the outcome of the investigation and proceedings. This should occur prior to the return to work of the member of staff (if suspended).

The Principal, DSL and Head of Human Resources should give consideration to what information, if any, should be made available to other staff and external parties.

Where staff have been suspended, they will be offered support and counselling, should they wish to receive this.

### 3.6 Allegations Without Foundation

Obviously false allegations may be indicative of problems of abuse elsewhere. A record should be kept and consideration given to a referral to children's services or adult social care in order that other agencies may act upon the information.

In consultation with the DSL, the Principal or Head of Human Resources shall:

- Inform the member of staff against whom the allegation is made orally and in writing that no further disciplinary or child protection action will be taken. Consideration should be given to offering counselling/support.
- Inform the parents/carers of the alleged victim that the allegation has been made and of the outcome.
- Where the allegation was made by a child other than the alleged victim, consideration to be given to informing the parents/carers of that child.
- Prepare a report outlining the allegation and giving reasons for the conclusion that it had no foundation and confirming that the above action has been taken.

### 3.7 Records

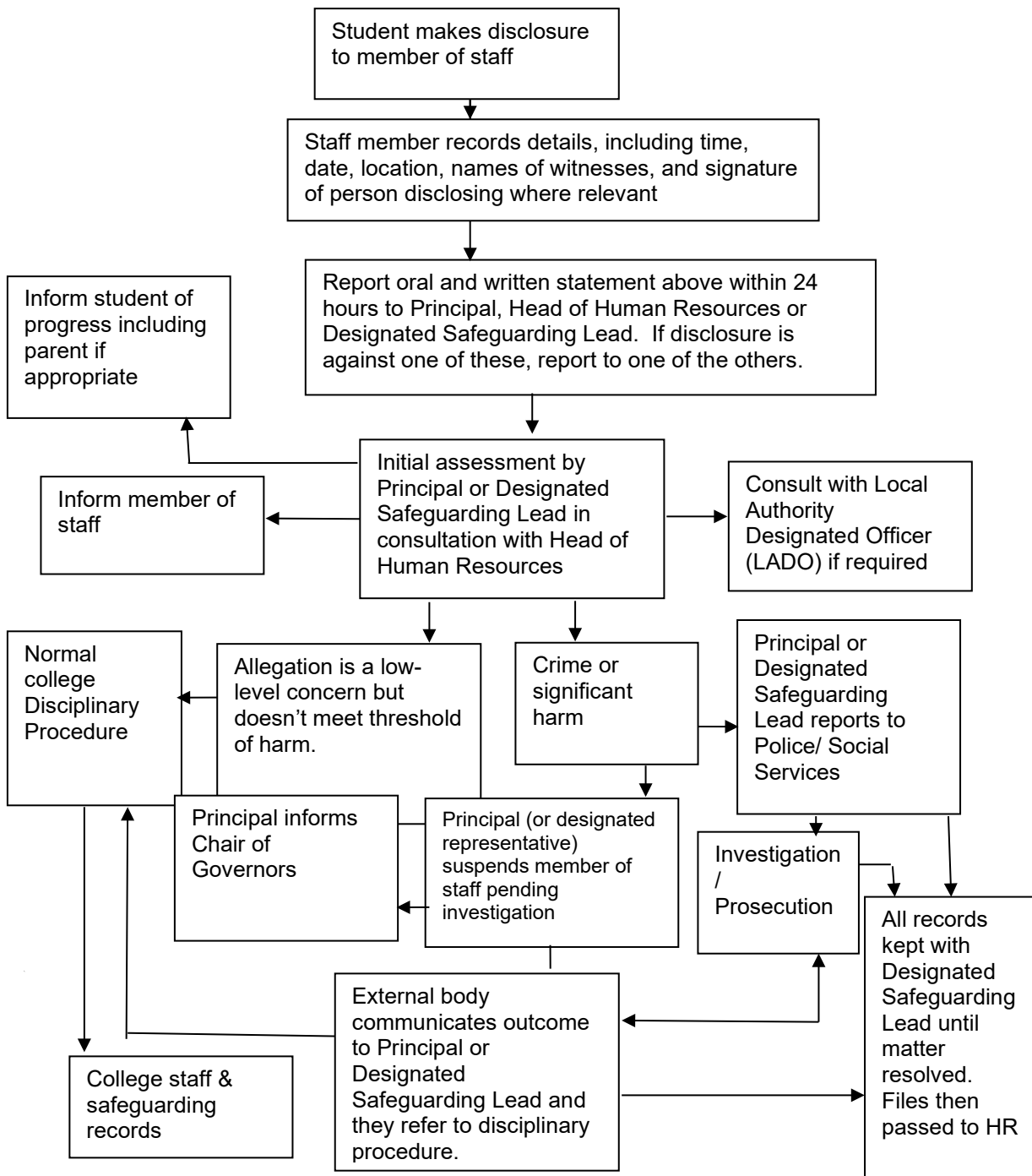
Documents relating to an investigation are retained in a secure place, together with a written record of the outcome and, if disciplinary action is taken, details retained on the member of staff's personal and confidential file.

If a member of staff is dismissed or resigns before the disciplinary process is completed, they should be informed about CWA's statutory duty to inform the Secretary of State for Education.

### 3.8 Monitoring Effectiveness

Where an allegation has been made against a member of staff, a nominated Governor, together with the senior staff member with lead responsibility should, at the conclusion of the investigation and any disciplinary procedures, consider whether there are any matters arising from it that could lead to the improvement of the college's procedures and/or policies and/or which should be drawn to the attention of the Local Safeguarding Board. Consideration should also be given to the training needs of staff.

### 3.9 Flow chart summarising outline process to be followed in the event of an allegation of abuse against a member of staff



## APPENDIX 4: Contact Details

### DESIGNATED SAFEGUARDING OFFICERS

All Designated Safeguarding Officers can support staff with safeguarding issues to raise. The Governor with responsibility for Safeguarding can be contacted through the Head of Governance, Jules Bridges, on 01553 815288 or extension 2288.

Safeguarding concerns can be reported to [safeguarding@cwa.ac.uk](mailto:safeguarding@cwa.ac.uk) or via phone to extension 2265 (office hours). They can also be reported directly to any of the staff on the list below. Any urgent concern reported by email should be followed up by phone or face to face.

Job Title	Base campus	Name	Telephone
<b>Designated Safeguarding Lead</b> Assistant Principal Student Services	King's Lynn	Paul O'Shea	01553 815292
<b>Deputy Designated Safeguarding Lead</b> Student Welfare Manager	King's Lynn	Julie Robinson	01553 815562
Safeguarding & Welfare Supervisor (KL & Wisbech)	King's Lynn	Jodie Caseley	01553 815265
Safeguarding & Welfare Advisor (KL)	King's Lynn	Rachel Stanton	01553 815761
Safeguarding & Welfare Advisor (KL)	King's Lynn	Nicky Newman	01553 815364
Safeguarding & Welfare Advisor (KL)	King's Lynn	Elaine Croker	01553 815839
Safeguarding & Welfare Advisor (KL)	King's Lynn	Vacant	
Safeguarding & Welfare Advisor (Wisbech)	Wisbech	Alex Squire	01945 582561
Safeguarding & Welfare Advisor / Student Mentor (Cambridge)	Cambridge	Robyn Hodgins	01223 860701
Safeguarding & Welfare Advisor / Student Mentor (Cambridge)	Cambridge	Rachel Potter	01223 860701
Head of Department – Employer Liaison, Partnerships and Commercial Training	King's Lynn	Paul Smith	01553 815 401 Mob: 07825 540 205
Applewood Nursery Nominated Person (Head of Faculty, Public & Caring Services)	King's Lynn	Rachel Boast	01553 815892