

Education For Industry Group Safeguarding Policy

INCORPORATING CHILD PROTECTION



Divisions:

- **Fashion Retail Academy**
- **London College of Beauty Therapy**
- **Education for Industry Training**

Last Reviewed **September 2024**

Next Review date **September 2025**

Background to the Policy Update

[Keeping Children Safe in Education, September 2024](#)

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Policy Consultation & Review:

This policy is available on Education for Industry website and is available on request from FRAsafeguarding@efigroup.ac.uk.

We recognise the expertise our staff build by undertaking safeguarding training and managing safeguarding concerns on a daily basis and we therefore invite staff to contribute to and shape this policy and associated safeguarding arrangements.

This policy is provided to all staff at induction alongside our Staff Code of Conduct, Behaviour Policy and the safeguarding response to those pupils who are missing from education. In addition, all staff are provided with Part One of the statutory guidance [Keeping Children Safe in Education, September 2024](#)

This policy will be reviewed in full by the Governing Board on an annual basis.

Last Reviewed	August 2024
Next Review date	September 2025

1 – Introduction

Policy Statement

The Education for Industry (EFI) Group recognises that student safeguarding and wellbeing is of paramount importance. This policy aims to safeguard and promote our students' wellbeing, safety and health across the Group by fostering an honest, open, caring, and supportive climate. Safeguarding is the responsibility of all staff within the EFI Group, and applies to all staff (permanent, temporary or agency workers), volunteers, Governors and visitors to the EFI Group colleges.

This Policy applies to all educational institutions within the EFI Group, which includes but is not limited to, The Fashion Retail Academy (FRA), The London College of Beauty Therapy (LCBT), Education for Industry Training (EFIT).

Safeguarding is:

- 'Protecting children and young people from maltreatment'
 - 'Preventing impairment of children's mental and physical health or development'
 - 'Ensuring that children and young people are growing up in circumstances consistent with the provision of safe and effective care'
 - 'Taking action to enable all children to have the best outcomes'
- [*Children Act 2004 and KCSIE 2024*]

The EFI Group and this Policy works in accordance with the following legislation and guidance:

- [Working Together to Safeguard Children](#) DfE (2023)
- [Keeping Children Safe in Education](#), DfE (2024)
- [Guidance for Safer Working Practices for Adults who work with Children and Young People in Education Settings](#) (May 2019)
- [What to do if you're worried a child is being abused](#) DfE (March 2015)
- [Information sharing: advice for practitioners providing safeguarding services](#) DfE (July 2018)
 - [The Prevent duty guidance: for England and Wales](#) (2023)
- [Mandatory Reporting of Female Genital Mutilation- procedural information](#) Home Office (December 2015)
- [Sexual violence and sexual harassment between children in schools and colleges](#) DfE (July 2021)
- [Child sexual exploitation: guide for practitioners](#) DfE (February 2017)
- [Teaching online safety in school](#) DfE (June 2019)
- [Mental Health and Behaviour in Schools](#) DfE (November 2018)
- [Data protection: toolkit for schools](#) DfE (September 2018)
- [Promoting the education of children with a social worker](#) (June 2021)
- [Preventing youth violence and gang involvement](#)
- [Criminal exploitation of children and vulnerable adults: county lines](#)
- [Relationships Education, Relationships and Sex Education \(RSE\) and Health Education](#)

2 – Safeguarding – Aims and Objectives

Aims

- to ensure that the students 'are, and feel, safe' - and that the Group is effective in taking 'reasonable steps to ensure that they are, and feel, safe'.
- to have the best interests of the students at the heart of everything the Group does
- to raise an awareness that the Group will reflect problems that exist in society, and that these can exist between students and adults within the Group context
- to cultivate an attitude of 'it can happen here' and where concerns are taken seriously
- to recognise that promoting and safeguarding the welfare of children and young people is everyone's responsibility
- to provide all staff with the necessary information to enable them to meet their safeguarding and child protection responsibilities
- to continue to develop good practice, recognising our statutory responsibilities, in ensuring the effectiveness of the Group's policies and procedures.

Objectives

To prioritise, promote and encourage:

- hiring and effective training of Designated Safeguard Leads (DSLs) across the EFI Group
- effective identification and response to concerns regarding the welfare and safety of the students
- curriculum/tutorial links that enable the Group and students to discuss these issues
- safeguarding and safety through child protection, staff recruitment and other Group policies and procedures (for example for dealing with areas such as online safety, health & safety, first aid and medical conditions, behaviour, positive mental health, etc.)
- effective working relationships with outside agencies to safeguard and promote the welfare of the students
- student safety as a feature of Parent/Group staff liaison
- an oversight of the Group's child protection policies by Governors including providing them with supportive evidence to ensure these are implemented

3 – Safeguarding – Child Protection: policy and procedures

Aims:

To prioritise, promote and encourage safeguarding and child/student safety.

Background Information:

Child abuse describes all ways in which a child's development and health are damaged by the actions or inactions of others. Children have a right to be safe and adults have a responsibility to protect, therefore all child abuse must be referred. "Children" refers to everyone under the age of 18 years.

Definition of abuse:

Abuse is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others (e.g. via the internet). They may be abused by an adult or adults or another child or children. Abuse can take place wholly online, or technology may be used to facilitate offline abuse.

Signs of abuse:

Might include (but are not limited to) any of the following:

- Unexplainable or unusual injury or series of injuries
- Change in behaviour
- Drop in quality of work
- Loss or gain of weight
- Appearance of neglect
- Mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

Effects of Abuse:

Neglect or abuse, physical, emotional or sexual, can have major long- term effects on all aspects of a child's health, development and wellbeing. Sustained abuse is likely to have a deep impact on the child's self-image and self-esteem, and on his or her future life. Harm may occur intentionally or unintentionally.

Physical Abuse:

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

Emotional Abuse:

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Sexual Abuse:

Sexual abuse involves forcing or enticing a child or young person into sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

Neglect:

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to:

- provide adequate food, clothing or shelter including exclusion from

home or abandonment

- protect a child from physical and emotional harm or danger
- ensure adequate supervision including the use of inadequate care-givers
- ensure access to appropriate medical care or treatment.

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

Domestic Abuse:

Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional. Children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn.

The Domestic Abuse Act 2021 received Royal Assent on 29 April 2021. The Act introduces the first ever statutory definition of domestic abuse and recognises the impact of domestic abuse on children, as victims in their own right, if they see, hear or experience the effects of abuse.

Child Exploitation:

Child Sexual Exploitation (CSE):

Child sexual exploitation (CSE) 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) 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. CSE can affect any child or young person (male or female) under the age of 18 years, including 16- and 17-year-olds who can legally consent to have sex. It can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation.

Sexual abuse may involve physical contact, including assault by penetration (for example, rape or oral sex) or nonpenetrative acts such as masturbation, kissing, rubbing, and touching outside clothing. It may include noncontact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse including via the internet.

It is important to recognise that some young people who are being sexually exploited do not exhibit any external signs of this abuse. Key indicators of CSE may be:

- Going missing for periods of time or regularly going home late
- Regularly missing lessons
- Appearing with unexplained gifts and new possessions
- Associating with other young people involved in exploitation
- Having older boyfriends or girlfriends
- Undergoing mood swings or drastic changes in emotional wellbeing
- Displaying inappropriate sexualised behaviour
- Suffering from sexually transmitted infections or becoming pregnant
- Displaying changes in emotional wellbeing
- Misusing drugs or alcohol

Child Criminal Exploitation (CCE):

CCE is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial or other advantage of the perpetrator or facilitator and/or (c) through violence or the threat of violence. It 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.

CCE does not always involve physical contact; it can also occur through the use of technology. CCE can include children being forced to work in the production of illegal drugs, such as in cannabis factories, being coerced into moving drugs or money across the country, forced to shoplift or pickpocket, or to threaten other young people. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others. Children can become trapped by this type of exploitation as perpetrators can threaten victims (and their families) with violence or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others. As children involved in criminal exploitation often commit crimes themselves, their vulnerability as victims is not always recognised by adults and professionals, (particularly older children), and they are not treated as victims despite the harm they have experienced. They may still have been criminally exploited even if the activity appears to be something they have agreed or consented to. The experience of girls who are criminally exploited can be very different to that of boys. Boys and girls being criminally exploited may be at higher risk of sexual exploitation.

Some of the following can be indicators of CCE:

- children who appear with unexplained gifts or new possessions;

- children who associate with other young people involved in exploitation;
- children who suffer from changes in emotional well-being;
- children who misuse drugs and alcohol;
- children who go missing for periods of time or regularly come home late; and
- children who are regularly not in attendance or do not take part in education.

County Lines:

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one or more importing areas [within the UK], using dedicated mobile phone lines or other form of “deal line”. Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to move [and store] drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children can be targeted and recruited into county lines in a number of locations including academy’s, colleges, further and higher educational institutions, student referral units, special educational needs schools, children’s homes and care homes. Children are often recruited to move drugs and money between locations and are known to be exposed to techniques such as ‘plugging’, where drugs are concealed internally to avoid detection. Children can easily become trapped by this type of exploitation as county lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

Staff members who suspect a student may be vulnerable to, or involved in, this activity will immediately report all concerns to the DSLs. The DSLs will consider referral to the National Referral Mechanism on a case-by-case basis.

Indicators that a student may be involved in county lines activity include the following:

- Persistently going missing or being found out of their usual area
- Unexplained acquisition of money, clothes or mobile phones
- Excessive receipt of texts or phone calls
- Relationships with controlling older individuals or groups
- Leaving home without explanation
- Evidence of physical injury or assault that cannot be explained
- Carrying weapons
- Sudden decline in academic attainment
- Becoming isolated from peers or social networks
- Self-harm or significant changes in mental state
- Parental reports of concern

Homelessness:

The DSLs will be aware of the contact details and referral routes into the Local Housing Authority so that concerns over homelessness can be raised as early as possible. Indicators that a family may be at risk of homelessness include the

following:

- Household debt
- Rent arrears
- Domestic abuse
- Anti-social behaviour
- Any mention of a family moving home because “they have to”

Referrals to the Local Housing Authority do not replace referrals to Children’s Social Care Services where a child is being harmed or at risk of harm. For 16- and 17-year-olds, homelessness may not be family-based and referrals to Children’s Services will be made as necessary where concerns are raised.

Missing Children:

A child being absent, as well as missing, from education can be a warning sign of a range of safeguarding concerns, including sexual abuse, sexual exploitation or criminal child exploitation. Any child who goes missing or leaves without the college knowing which college they are transferring to, must be reported to the Local Authority. The EFI Group follows the procedures set out by the Local Authority, based on the DfE statutory guidance for Local Authorities September 2016, Children Missing Education (CME). The Group has appropriate safeguarding arrangements in place to respond to children who have unexplainable and/or persistent absences from education, particularly on repeat occasions and/or for a prolonged period of 3 weeks. Each college within the Group holds emergency contact numbers for its respective students giving additional options to make contact with a responsible adult when a child missing education is also identified as a welfare and/or safeguarding concern.

Looked After Children (LAC):

Particular care must be taken in overseeing provision for looked after children because the most common reason for children becoming looked after is as a result of abuse/neglect. The Group’s DSLs, who are also the designated leads for Looked After Children, will have details of the child’s social worker and virtual Academy head in the authority that looks after the child, and will liaise appropriately. This will be done with due regard to the Children and Social Work Act 2017 and includes a responsibility for promoting the educational achievement of children who have left care through adoption, special guardianship or child arrangement orders or who were adopted from state care outside England and Wales” in addition to LAC.

Private Fostering:

Private fostering is when a child under the age of 16 (under 18 if disabled) is cared for by someone who is not their parent or a 'close relative'. This is a private arrangement made between a parent and a carer, for 28 days or more. Close relatives are defined as step-parents, grandparents, brothers, sisters, uncles or

aunts (whether of full blood, half blood or marriage/affinity). The Group has a mandatory duty to inform the Local Authority of any student in this situation.

Child-on-Child Abuse:

All staff should be aware that children can abuse other children (previously referred to as peer-on-peer abuse), and that it can happen both inside and outside of college and online. Staff should understand that even if there are no reports in college it does not mean it is not happening and it may be the case that it is just not being reported. It is important if staff have any concerns regarding child-on-child abuse they should speak to the DSL or DDSL.

Staff should understand the importance of challenging inappropriate behaviours between peers, many of which are listed below, that are actually abusive in nature. Downplaying certain behaviours, for example dismissing sexual harassment as “just banter”, “just having a laugh”, “part of growing up” or “boys being boys” 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.

Child-on-Child abuse is most likely to include, but may not be limited to:

- bullying (including cyberbullying and online interaction);
- abuse in intimate personal relationships between peers;
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse);
- sexual violence, such as rape, assault by penetration and sexual assault; (this may include an online element which facilitates, threatens and/or encourages sexual violence);
- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse;
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party;
- consensual and non-consensual sharing of nudes and semi nudes images and or videos (also known as sexting or youth produced sexual imagery);
- upskirting, which typically involves taking a picture under a person’s clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm; and
- Initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

Child-on-child abuse of any type is considered completely unacceptable and is

dealt with in line with this policy and other relevant policies. This includes incidents of social media and other online or phone abuse, including “sexting”. The Group follows the UKCCIS guidance, Sexting in Academies and colleges, responding to incidents and safeguarding young people (2016) as well as the KCSIE (2023) Filtering and Monitoring procedures.

Sexual Violence and Harassment:

Sexual violence and sexual harassment can occur between two children of any age and sex, from primary through to secondary stage and into colleges. It can occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Sexual violence and sexual harassment exist on a continuum and may overlap; they can occur online and face to face (both physically and verbally) and are never acceptable.

Children who are victims of sexual violence and sexual harassment wherever it happens, will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same college.

Any report of sexual violence or sexual harassment should be taken seriously. Staff should be aware that there are more female victims of sexual violence and sexual harassment (which is more likely to be perpetrated by males). It is also important to note that males are significantly more likely to be the victims of sextortion than females.

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

It is important to note that children may not find it easy to tell staff about their abuse verbally. Children can show signs or act in ways that they hope adults will notice and react to. In some cases, the victim may not make a direct report. For example, a friend may make a report, or a member of staff may overhear a conversation that suggests a child has been harmed or a child's own behaviour might indicate that something is wrong.

Incidents of sexual violence and harassment will be dealt with in accordance with:

- [Sexual Violence and Harassment Policy 2024.docx](#)
- Part Five of KSCIE 2024

So-called 'honour-based' violence:

Is defined as a violent crime or incident which may have been committed to protect or defend the honour of the family or community. Women and girls are the most common victims of so-called 'honour-based' violence. Effective handling of so-called 'honour based' violence, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing and related cases, must form part of existing child and adult protection structures, policies and procedures.

Forced marriage:

There is a clear distinction between a forced marriage and an arranged marriage. In arranged marriages, the families of both spouses take a leading role in arranging the marriage, but the choice of whether or not to accept the arrangement still remains with the prospective spouses. However, in forced marriage, one or both spouses do not consent to the marriage but are coerced into it. Duress can include physical, psychological, financial, sexual and emotional pressure. The UK Government regards forced marriage as an abuse of human rights and a form of domestic abuse, and where it affects children and young people, child abuse. It is a criminal offence. It can happen to both women and men, although many of the reported cases involve young women and students aged between 16 and 25. To address the increasing scale and extent of forced marriage, the UK Government established the Forced Marriage Unit (FMU) in 2005. Forced marriage of any person, regardless of gender, age, disability, ethnic origin or sexual orientation, is unacceptable. In addition, since February 2023 it has also been a crime to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday, even if violence, threats or another form of coercion are not used. As with the existing forced marriage law, this applies to non-binding, unofficial 'marriages' as well as legal marriages.

Female Genital Mutilation (FGM):

For the purpose of this policy, FGM is defined as the partial or total removal of the external female genitalia, or any other injury to the female genital organs. FGM is considered a form of abuse in the UK and is illegal. There is a range of potential indicators that a child or young person may be at risk of FGM, which individually may not indicate risk but if there are two or more indicators present this could signal a risk to the child or young person. Victims of FGM are likely to come from a community that is known to practice FGM. Staff should note that students at risk of FGM may not yet be aware of the practice or that it may be conducted on them, so sensitivity should always be shown when approaching the subject.

Indicators that may show a heightened risk of FGM include the following:

- The socio-economic position of the family and their level of integration into UK society

- Any girl with a mother or sister who has been subjected to FGM
- Any girl withdrawn from PSHE (or linked tutorial programme at EFI Group)

Indicators that may show FGM could take place soon include the following:

- When a female family elder is visiting from a country of origin
- A girl may confide that she is to have a 'special procedure' or a ceremony to 'become a woman'
- A girl may request help from a teacher if she is aware or suspects that she is at immediate risk
- A girl, or her family member, may talk about a long holiday to her country of origin or another country where the practice is prevalent

Indicators that FGM may have already taken place include the following:

- Difficulty walking, sitting or standing
- Spending longer than normal in the bathroom or toilet
- Spending long periods of time away from a classroom during the day with bladder or menstrual problems
- Prolonged or repeated absences from college followed by withdrawal or depression
- Reluctance to undergo normal medical examinations
- Asking for help, but not being explicit about the problem due to embarrassment or fear

Staff will never examine students, and so it is rare that they will see any visual evidence, but they will report to the police where an act of FGM appears to have been carried out. Unless the teacher has a good reason not to, they should also consider and discuss any such case with the DSL and involve MASH as appropriate.

FGM is also included in the definition of so-called '**honour-based' violence** (HBV), which involves crimes that have been committed to defend the honour of the family and/or community, alongside forced marriage and breast ironing. All forms of HBV are forms of abuse and will be treated and escalated as such. Staff will be alert to the signs of HBV, including concerns that a child is at risk of HBV, or has already suffered from HBV, and will consult with the DSL who will activate local safeguarding procedures if concerns arise.

Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a personal statutory duty upon student facing team members, along with social workers and healthcare professionals, to report to the police where they discover (either through disclosure by the victim or through evidence) that FGM appears to have been carried out on a girl under 18.

Whilst all staff must activate local safeguarding procedures (including speaking to the DSL), using existing national and local protocols for multi-agency liaison with police and children's social care, this specific legal duty

placed on student facing team members requires the member of staff to report this to the police directly. The DSL will assist with this.

Preventing Radicalisation:

Children are vulnerable to extremist ideology and radicalisation. Similar to protecting children from other forms of harm and abuse, protecting children from this risk should be a part of the Group's safeguarding approach. The Counter-Terrorism & Security Act 2015 (including the Prevent Duty Guidance 2015) places a duty on education and other childcare providers to have due regard to the need to prevent people from being drawn into terrorism. See the Group's Extremism & Radicalisation Policy.

Incidents of extremism and radicalisation will be dealt with in accordance with:

- [Policy for Preventing extremism and radicalisation 2024.docx](#)
- Annex B of KSCIE 2024 (under review following publication of a new definition of extremism)

Difficult Circumstances:

Students with family members in prison:

Students with a family member in prison will be offered pastoral support as necessary. It may be helpful to offer students a copy of 'Are you a young person with a family member in prison?' from 'Action for Prisoners' Families' where appropriate and allowed the opportunity to discuss questions and concerns.

Students required to give evidence in court:

Students required to give evidence in criminal courts, either for crimes committed against them or crimes they have witnessed, will be offered appropriate pastoral support. It may be helpful to offer students the booklet 'Going to Court and being a Witness (12 to 17 year olds)' from HMCTS where appropriate and allowed the opportunity to discuss questions and concerns.

Serious Violence:

Staff should be aware of indicators that a young person may be at risk from, or involved with, violent crime. These may include increased unexplainable and/or persistent absences from education, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could

also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation.

All staff should be aware of the range of risk factors which increase the likelihood of involvement in serious violence, such as being male, having been frequently absent or permanently excluded from school, having experienced child maltreatment and having been involved in offending, such as theft or robbery.

Further information can be found in the Home Office 'Preventing Youth Violence and Gang Involvement' and its 'Criminal Exploitation of Children and Vulnerable Adults: County Lines Guidance'.

Using reasonable force:

There are circumstances when it is appropriate for staff in schools to use reasonable force to safeguard children and young people. The term 'reasonable force' covers the broad range of actions used by staff that involve a degree of physical contact to control or restrain children. This can range from guiding a child to safety by the arm, to more extreme circumstances such as breaking up a fight or where a young person needs to be restrained to prevent violence or injury. 'Reasonable' in these circumstances means 'using no more force than is needed'. The use of force may involve either passive physical contact, such as standing between students or blocking a student's path, or active physical contact such as leading a student by the arm out of the classroom. There is guidance available at: [Use of reasonable force in schools - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/use-of-reasonable-force-in-schools)

4 - Children/young people with Special Education Needs or Disabilities:

It is vital that all areas of safeguarding are considered with insight and care when dealing with children/young people with Special Educational Needs or Disabilities (SEND) both onsite and/or online, as there may well be additional challenges to overcome. It is important to be aware that additional barriers can exist when recognising child protection issues, including abuse and neglect, in children/young people with Special Educational Needs or Disabilities.

5 - Children who are lesbian, gay, bisexual or gender questioning:

A child or young person being lesbian, gay, or bisexual is not in itself an inherent risk factor for harm, however, they can sometimes be targeted by

other children. In some cases, a child who is perceived by other children to be lesbian, gay, or bisexual (whether they are or not) can be just as vulnerable as children who are.

However, the Cass review identified that caution is necessary for children questioning their gender as there remain many unknowns about the impact of social transition and children may well have wider vulnerabilities, including having complex mental health and psychosocial needs, and in some cases additional diagnoses of autism spectrum disorder and/or attention deficit hyperactivity disorder.

As such, when supporting a gender questioning child, schools should take a cautious approach and consider the broad range of their individual needs, in partnership with the child's parents (other than in the exceptionally rare circumstances where involving parents would constitute a significant risk of harm to the child), including any clinical advice that is available and how to address wider vulnerabilities such as the risk of bullying. Schools should refer to our Guidance for Schools and Colleges in relation to Gender Questioning Children, when deciding how to proceed.

Risks can be compounded where children lack trusted adults with whom they can be open. It is therefore vital that staff endeavour to reduce the additional barriers faced and create a culture where they can speak out or share their concerns with members of staff.

6 – Safeguarding Students in the Workplace:

Students (including apprentices and those on work placements) not on site at EFI Group still need to be safeguarded against the same range of risks and dangers as their peers in schools and colleges. Due to their relative inexperience in the workplace, in some cases, students may be particularly vulnerable to anxiety or struggle to cope with the transition. Systems can help staff recognise this and offer suitable support to those who need it. EFI Group has therefore put processes in place to protect our students whilst they are off site, in person and online.

From academic year 2024, The Education for Industry Group will advise employers to do the following: *familiarise themselves with relevant government legislation and take appropriate steps to understand what safeguarding means in practice at their organisation, in the context of the responsibilities they have for the people they employ.*

- The EFI Group point of contact organising placements/apprenticeships will provide all professional partners working with our students with our Safeguarding (including Child Protection) Policy and any other relevant guidance e.g. Best Practice Guide to Safeguarding.

- Ensure all employers working with our students are aware of our safeguarding policy and required standards of behaviour.
- Ensure that any staff working with students who are not on site recognise that they are in a position of trust.
- Ensure trainees/apprentices and all students on placements are made aware of the organisation's policies on using the internet and technology in the workplace.
- Students will be provided with the Student Code of Conduct and required to follow it whilst on placements.
- Understand the dangers students may face when not on-site using technology in the workplace and act to minimise risks.

This policy is also designed to protect employers and provide a procedure to report or raise any concerns they may have. If employers have any safeguarding concerns regarding an EFI Group student, they can contact the relevant safeguarding leads in EFI Group in the first instance. Details of which are provided in this policy.

Following receipt of any information raising concern, the DSL will consider what action to take and seek advice from Children's or Vulnerable Adult Services as required. All information and actions taken, including the reasons for any decisions made, will be fully documented.

All referrals will be made in line with the Local Safeguarding Board for London vulnerable adult procedures as outlined in Appendix 3.

If, at any point, there is a risk of immediate serious harm to a student a referral should be made to Children's or Vulnerable Adult Services immediately. Anybody can make a referral in these circumstances. If the student's situation does not appear to be improving the staff member with concerns should press for re-consideration by raising concerns again with the DSL and/or the Principal. Concerns should always lead to help for the student at some point.

Staff should always follow the reporting procedures outlined in this policy in the first instance. However, they may also share information directly with Children's and Vulnerable Adult Services, or the police if:

- the situation is an emergency and the designated senior person, their alternate and the Principal 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 student have been responded to appropriately and in accordance with the procedures outlined in this policy should raise their concerns with the Principal and CEO or the Chair of Governors.

7 – Homestay Exchange Visits:

Where one of our colleges is arranging for a visiting student to be provided with care and accommodation in the UK in the home of a family to which the student is not related, the responsible adults are considered to be in regulated activity for the period of the stay. In such cases, the college is the regulated activity provider; therefore, the college will obtain all the necessary information required, including a DBS enhanced certificate with barred list information, to inform its assessment of the suitability of the responsible adults. Where criminal record information is disclosed, the college will consider, alongside all other information, whether the adult is a suitable host. In addition to the responsible adults, the college will consider whether a DBS enhanced certificate should be obtained for anyone else aged over 16 in the household.

8 – College-arranged homestays abroad:

Our colleges will liaise with partner colleges/schools to discuss and agree the arrangements in place for the visit. Our colleges will consider, on a case-by-case basis, whether to contact the relevant foreign embassy or High Commission of the country in question to ascertain what checks may be possible in respect of those providing homestay outside of the UK. Our colleges will use their professional judgement to assess whether the arrangements are appropriate and sufficient to safeguard every child involved in the exchange. Students will be provided with emergency contact details to use where an emergency occurs, or a situation arises that makes them feel uncomfortable.

9 – Privately arranged homestays:

Where a parent or student arranges their own homestay, this is a private arrangement, and the college is not the regulated activity provider.

10 – Alternative Provision:

The EFI Group will remain responsible for a student's safeguarding during their time at any alternative provider and should be satisfied that the placement meets the student's needs. When placing a student with an alternative provider, the college will obtain written confirmation that the provider has conducted all relevant safeguarding checks on staff. The EFI Group will arrange alternative provision in accordance with statutory guidance provided by the Department of Education: Alternative provision - DfE Statutory Guidance; and Education for children with health needs who cannot attend mainstream school.

11 – Filtering and Monitoring:

The DSLs and Senior Leadership Team within the EFI Group are responsible for all staff to be trained in expectations, roles and responsibilities around the filtering and monitoring system. Senior leaders should work closely with governors or proprietors, the DSLs and IT service providers in all aspects of filtering and monitoring. An annual review should be conducted by members of the Senior Leadership Team, the DSL, and the IT service provider and involve the responsible governor. The results of the online safety review should be recorded for reference and made available to those entitled to inspect that information.

Governing bodies and proprietors should support the Senior Leadership Team to review the effectiveness of your monitoring strategies and reporting process. Make sure that incidents are urgently picked up, acted on and outcomes are recorded. Incidents could be of a malicious, technical, or safeguarding nature. It should be clear to all staff how to deal with these incidents and who should lead any actions.

12 – Online Safety:

This can be categorised into four areas of risk:

Content: Being exposed to illegal, inappropriate or harmful content, for example: pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism.

Contact: Being subjected to harmful online interaction with other users; for example: peer to peer pressure, commercial advertising and 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 (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying; and

Commerce: Risks such as online gambling, inappropriate advertising, phishing and or financial scams. If you feel your students, students or staff are at risk, please report it to the Anti-Phishing Working Group (<https://apwg.org/>)

Mobile phone and Camera Safety: The sending and viewing of inappropriate messages or images from mobile devices by students or staff is strictly prohibited.

The EFI Group has appropriate monitoring and filtering in place.

13 – Sports Clubs and Extracurricular Activities:

Clubs and extracurricular activities hosted by external bodies, e.g. charities or companies, will work in collaboration with EFI Group to effectively safeguard students and adhere to local safeguarding arrangements. Paid and volunteer staff running sports clubs and extracurricular activities are aware of their safeguarding responsibilities and promote the welfare of students, including knowing how they should respond to child protection concerns and how to make a referral to Children's Services or the police, if necessary.

14 – Use of Group premises for non-Group activities:

Where college facilities are hired by organisations or individuals they should ensure that appropriate arrangements are in place to keep children safe. They must provide reassurance that the appropriate safeguarding and child protection policies and procedures are in place and ensure that there are arrangements in place to liaise with the college on these matters where appropriate.

15 – Elective Home Education (EHE):

Where a parent/carer has expressed their intention to remove a child from the EFI Group with a view to educating at home, the college will work with the Local Authority and other key professionals to coordinate a meeting with parents/carers where required.

16 – Referring Children/Young People:

When there is evidence of, or a likelihood of, significant harm as defined to include any of the four types of abuse set out above or accident or injury that is sufficiently serious to adversely affect progress and enjoyment of life. Harm is defined as the ill treatment or impairment of health and/or development as compared to what could be reasonably expected of a similar child. 'Significant harm' is a professional judgement and is at the core of child protection.

The Children Act 1989 for England and Wales is the context for all child protection work. The key principles are that:

- The interests of the child are paramount
- All intervention should consider the wishes and feelings of the child in light of their age and understanding; the racial, linguistic and religious background of the child; whether there is significant harm or the likelihood of significant harm
- Agencies should work in partnership with the child's parents where possible

The Children Act 2004 for England and Wales placed a duty on services to ensure that every child had the support they needed to be healthy, stay safe, enjoy and achieve, make a positive contribution to society, and achieve economic well being i.e. The Every Child Matters Agenda. It also required that every Local Authority establishes a **Local Safeguarding Children's Partnership** to co-ordinate work of all agencies.

The Children & Families Act 2014 contains the latest regulatory guidance. The **Common Assessment Framework (CAF)** is intended to provide a holistic assessment of a child's needs. The Academy follows the key national guidance: DfE statutory documents "**Keeping Children Safe in Education (KCSIE) 2024**" and "**Working Together to Safeguard Children 2023**" and DfE guidance "**What to do if you are worried that a child is being abused 2015**".

The EFI Group recognises the need to work together with other agencies, and believes that this brings the best benefit for children and young people. As it says in "**Working Together to Safeguard Children 2023**", 'Governing bodies and proprietors should ensure that the Academy or college contributes to inter-agency working in line with statutory guidance Working together to safeguard children. Academies and colleges should work with social care, the police, health services and other services to promote the welfare of children and protect them from harm'.

Where there is a safeguarding concern, the Group will ensure the child's wishes and feelings are taken into account when determining what action to take and what services to provide. Systems are in place, and are well promoted, for students to confidently report abuse, knowing their concerns will be treated seriously, and knowing they can safely express their views and give feedback.

The EFI Group Commitments:

All the below are reasonable measures that will be taken.

- to nurture an inclusive, caring culture in which everyone is treated with respect, listened to, and feel able to speak up when something is wrong
- to ensure that we practise safe recruitment (including DBS checks and compliance with the Independent Academy Standards Regulations) in checking the suitability of staff and volunteers to work with children and

young people, following the guidance in "Keeping Children Safe in Education (2024)

- to protect each student from any form of abuse, whether from an adult or another student
- to be alert to signs of abuse both within our colleges and from outside
- to deal appropriately with every suspicion or complaint of abuse
- to design and operate procedures which promote this Policy and which, as far as possible, ensure that all staff and others who are innocent are not prejudiced by false allegations
- to support children who have been abused
- to be alert to the medical needs of children with medical conditions
- to operate robust and sensible health and safety procedures
- to take all practical steps to ensure that college premises are as secure as circumstances permit
- to operate clear and supportive policies on drugs, alcohol and substance misuse
- to consider and develop procedures to deal with any other safeguarding issues which may be specific to individual children in our colleges or in our local area
- to ensure that all staff (including temporary and voluntary) receive a Safeguarding Induction, including:
 - the role of the Designated Safeguarding Lead [DSL], Deputy Designated Safeguarding Leads [DDSL] and who they are at EFI Group
 - understanding the importance of speaking to the DSL to raise any concerns or details of disclosures,
 - that they should discuss their safeguarding concerns regarding children/young people only with the DSL, one of the DDSLs or directly with MASH,
 - that if the concern is regarding a member of staff, they must speak to the college's Principal and CEO,
 - that if the concern is regarding the Principal, they must contact the Chair of Governors
 - that all staff will need to have an annual update
 - that all staff will need to sign to confirm that they have read and understood the following documents:
 - i. the Group's Safeguarding (Child Protection) Policy,
 - ii. the Group's Behaviour Policy (and understand how it is applied),
 - iii. The Group's system for absence reporting,
 - iv. the Code of Conduct for Staff and Whistleblowing
 - v. "Keeping Children Safe in Education Part One and Annex A (for those working with children). to ensure that all staff (including temporary and voluntary) are trained in child protection every 3 years, with at least annual updates, enabling all staff to have an awareness of safeguarding issues, including being aware that these issues can manifest themselves via child-on-child abuse. This is most likely to include, but not limited to: bullying (including cyber bullying), gender-based violence/sexual assaults, sexual violence, sexual harassment, sextortion and sexting.
 - to ensure that all staff (including temporary and voluntary) complete a safeguarding induction and annual training including

expectations, roles and responsibilities around the filtering and monitoring system.

- to ensure, through training, that all staff have an awareness that behaviours linked to the likes of drug taking, alcohol abuse, truanting and sexting put children/young people in danger.
- to ensure that any difficulties or weaknesses in child protection arrangements are remedied without delay.

Where the EFI Group dismisses or ceases to use the services of a teacher because of serious misconduct, or might have dismissed them or ceased to use their services had they not left first, they will consider whether to refer the case to the Secretary of State (via the Teaching Regulation Agency).

Our colleges will build relationships and communicate readily with the Local Authority's Designated Officer, Social Services and, where necessary, the Child Protection Unit of the police (CPU). Any allegation or disclosure of abuse will be reported by the college immediately, in accordance with the procedures published by the Local Safeguarding Children Partnership (LSCP).

17 – Early recognition and information sharing:

To prevent the continuance of abuse and the downward spiral into more dangerous situations, information sharing is vital will take place. All children may benefit from early help, but Safeguarding training at our colleges will enable staff to be particularly alert to those children in At Risk categories, including where the child/young person:

- is disabled or has certain health conditions and has specific additional needs;
- has special educational needs (whether or not they have a statutory education, health and care plan);
- has a mental health need;
- 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 or county lines;
- is frequently missing/goes missing from education care or from home;
- has experienced multiple suspensions, is at risk of being permanently excluded from schools, colleges and in Alternative Provision or a Pupil Referral Unit.
- is misusing drugs or alcohol themselves;
- is at risk of modern slavery (we refer to the DfE guidance [Modern slavery: how to identify and support victims](#) for concerns of this nature), trafficking or sexual and/or criminal 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 so-called 'honour-based' abuse such as Female Genital Mutilation or Forced Marriage
- is at risk of being radicalised or exploited;
- is a privately fostered child/young person.

It is important to remember that the information you have may only be a fragment of the full picture and you must not assume that other people have access to this information but be mindful that early information sharing is vital for effective identification, assessment and allocation of appropriate service provision.

Children/young people rarely lie about abuse; rarely tell; and on average tell four adults before being 'heard'. Barriers to making referrals tend to be:

- Fear of exposing the child to further abuse;
- Fear of breaking up the family;
- Fear of over-reacting;
- Believing the child is fantasising or lying;
- Being persuaded by a child's retraction;
- Allowing a temporary improvement to distract from the reality of abuse.

When you hear an allegation of abuse you can, without intending to, take on the young person's pain and fear. If you are to remain calm and able to listen, you have to put these feelings to one side.

18 – What to do if:

Disclosure by a student:

You only need to find out just enough information to decide that a referral is needed. If you need to ask questions these should be just to clarify what the student is saying. It is very important that questions are open-ended and not leading, for example by asking Tell, Explain, Describe (TED) questions:

- Please **tell** me how it happened?
- Could you **explain** that a bit more?
- Can you **describe** that?

If you are the first person a student discloses to, you are very important to that particular student. Your supportive response will encourage the student to make further disclosures. Be calm and reassuring, but you cannot give a guarantee of confidentiality. You should explain that you need to pass the information on to the **Designated Safeguarding Lead (DSL)** who will be able to ensure that the correct next steps are taken.

Things you can say:

- I am taking what you are saying very seriously.
- You are not to blame.

- I understand this is very difficult to talk about.
- You are being very brave.
- I can't promise to keep this to myself.
- I will need to seek support to make sure you are safe and continue to be supported.

You must make an accurate record of the conversation. It is sometimes helpful to write down phrases whilst the student is talking, but it is most important to record exactly what was said immediately after the meeting. Ensure notes are timed, dated and signed if handwritten. In addition, any evidence of abuse that is revealed will need to be preserved. This might include emails, text messages, content on computers. You must pass this information on immediately to the Safeguarding Coordinator or Head of Wellbeing [DSL], if one of the DSLs are unavailable this must be passed on to one of the Deputy DSLs. The DSL will take the lead on cases of early help or intervention.

A written record will be kept of all concerns and recorded on Safeguard Software. It will include: a clear and comprehensive summary of the concern; details of how the concern was followed up and resolved and a note of any action taken, decisions reached and the outcome.

Suspicion of abuse:

All suspicions or complaints of abuse must be reported immediately to the DSL. If it involves an allegation of abuse against staff, including supply teachers, volunteers and contractors, then it must be reported to the college Principal (or to the Chair of Governors if the complaint is against the Principal). Any staff member may refer their concerns directly to Children's Social Care or the Local Authority Designated Officer (LADO), but the expectation is that this will only be done as an exception where necessary. The online tool '[Reporting child abuse to your local council](#)' directs staff to their local children's social care contact numbers. If in doubt, seek advice from the local authority designated officer (LADO).

Low level concerns regarding members of staff should be reported to create a culture of openness, trust and transparency which is monitored and reinforced by all staff. KSCIE 2024 states that examples of such behaviour could include but are not limited to: being over friendly with children, having favourites, taking photographs of children on their mobile phone, engaging with a child on a one-to-one basis in a secluded area or behind a closed door or using inappropriate sexualised, intimidating or offensive language.

[Managing allegations policy 2024.docx](#)

19 – Mental Health

Where students have suffered abuse and neglect or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children's experiences can impact on their mental health,

behaviour and education. If staff have a mental health concern about a child that is also a safeguarding concern, they should be reported immediately to the DSL. The Director of Student Services & Safeguarding and Wellbeing Team Managers are both Mental Health First Aid Trained and are our Designated Mental Health Leads.

20 – Important Contacts:

We have a team of staff across our colleges who are trained to the Designated Safeguarding Lead standard. These can be found in Appendix 2.

Our External key contacts are below:

External key contacts	
<i>Division: LCBT</i>	
Westminster Multi Agency Safeguarding Hub	AccesstoChildrensServices@westminster.gov.uk Tel: 020 7641 4000 (Out of hours – 020 7641 6000)
Westminster LADO	LADO@westminster.gov.uk 020 7641 7668
Westminster PREVENT	kmalik@westminster.gov.uk 020 7641 5071
<i>Division: FRA and EFIT</i>	
City of London Multi Agency Safeguarding Hub	Children.duty@cityoflondon.gov.uk 020 7332 3621/1620/3394
City of London LADO	LADO@cityoflondon.gov.uk 07795 090649
<i>National</i>	
DfE (non-emergency prevent advice)	counter@extremism@education.gsi.gov.uk 020 7340 7264
NSPCC Whistleblowing Helpline	Whistleblowing Advice Line NSPCC 0800 028 0285
UK Safer Internet Centre	helpline@saferinternet.org.uk 0344 381 4772

21 – Designated Safeguarding Lead commitments:

- advise and act upon all suspicion, belief and evidence of abuse reported to them.
- keep the Principal & CEO (through the Director of Student Services & Safeguarding) informed of all actions, unless the Director of Student Services & Safeguarding or Principal & CEO is the subject of a complaint. In this situation, the DSL must consult with the Chair of Governors or in their absence, the Vice Chair of Governors or LADO
- liaise with Local Authority Children’s Services and other agencies on behalf of the Group
- have updated Safeguarding and Child Protection for Professionals with Designated Responsibility training every two years.

- in addition to the DSL's formal training, as set out above, their knowledge and skills should be updated, (for example via e-bulletins, meeting other designated safeguarding leads, or taking time to read and digest safeguarding developments), at regular intervals, but at least annually, to keep up with any developments relevant to their role.
- have Prevent Awareness training.
- have Filtering and Monitoring training and complete annual audits

22. The main responsibility of a DSL:

- to be the first point of contact for parents, students, teaching and support staff and external agencies in all matters of child protection to co-ordinate the child protection procedures in the Group.
 - to refer all cases of suspected abuse to children's social care services, MASH (the Multi Agency Safeguarding Hub), the DBS, and the police in cases where a crime has been committed or where a person is dismissed or left due to risk/harm to a child
 - to refer cases of radicalisation to MASH for consideration of a referral to the Channel Panel.
 - to liaise with key staff (especially the Heads of and the Student Services Team) on matters of safety and safeguarding (including online and digital safety)
 - to advise on response to safeguarding concerns as appropriate and act as a source of support, advice and expertise for all staff
 - to be alert to the specific needs of all children/young people, and to encourage a culture of listening to them and taking account of their wishes/feelings in any measures put in place to protect them
 - to maintain an ongoing training programme for all EFI Group employees, ensuring that all staff and Governors are trained in Child Protection every 3 years, and in addition that all staff will receive safeguarding updates at least annually which will include the identity of the DSL, the EFI Group's Safeguarding (Child Protection) Policy, Filtering and Monitoring, relevant related policies, and a copy of Part 1 and Annex A of KCSIE, to provide them with relevant skills and knowledge to safeguard children/young people effectively. The EFI Group will ask staff to sign annually to say they have read and understood these documents.
 - to monitor the keeping, confidentiality and secure storage of records in relation to
 - child protection, separate to the student's main file
-
- to securely transfer the student's child protection file if they move to a different education, separate to their main college file. Confirmation of receipt of the file will be requested from the receiving education setting.
 - to consider whether it would be helpful to share any child protection information with
a student's new education setting in advance of transfer if this situation occurs.

- to act as the key receiving member of staff for student's child protection files when they move to the college and to keep the file separately to their main college file on receipt.
- to liaise with the child protection designated officer appointed by the Social Services Department (SSD).
- to obtain assurance that appropriate child protection checks and procedures apply to any staff employed by another organisation and working with our students on another site.
- to ensure that safeguarding issues are discussed with students and included in the curriculum as appropriate, particularly in the tutorial programme (which includes Sex & Relationships Education).
- to ensure that safeguarding policies are available publicly and parents/carers are made aware of the fact that referrals about suspected abuse or neglect may be made.
- The designated safeguarding lead should hold information on which students have social workers so that decisions can be made in the best interests of the child's safety, welfare and educational outcomes.
- If a report is determined to be unsubstantiated, unfounded, false or malicious, the Designated Safeguarding Lead should consider whether the child and/or the person who has made the allegation is in need of help
- To understand when to consider calling the police following NPCC guidance: [The National Police Chiefs Council \(NPCC\)](#)

23 – What happens next?

A referral is usually made to Children's Services using either the CAF or relevant borough referral form (some boroughs call it their "Early Help Form"). Children's Services will decide, within one working day of the referral being made, whether the referral should be a CAF (early intervention multi-agency services which requires agreement from the family), a Section 17 (Child in Need of Services – which follows a CAF and requires agreement from the family) or a Section 47 (Child Protection – which is a compulsory intervention).

Sometimes students will be taken directly to the hospital, or social services or the police informed. The local authority should decide within one working day of a referral being made about what course of action they are taking and should let the referrer know the outcome. Staff should follow up on a referral should that information not be forthcoming.

Assessments of young people should consider the wider environmental factors outside the home affecting the child's life that may pose a threat to their safety and/or welfare, so schools are encouraged to provide as much contextual information as possible as part of the referral process.

Note: No child/young person may be examined without their consent. Normally parents/carers will be informed, but if this is not in the best interests of the

child/young person then advice can be sought. Child protection information is shared on a 'need to know' basis. Decisions will be made at a strategy meeting on who this should be.

Child Protection referrals are usually sent to social services where checks are made with other agencies (Section 47). Parental/child consent is not needed for this. This is the assessment part of the investigation i.e. a guide to action. An investigation will usually involve talking to the person concerned, talking with the child, talking with the parents, liaising with other agencies, seeking specialist advice and assessing the ability of the parent to protect the child. Social services may then convene a strategy or 'professionals only' meeting to share information, decide on likelihood of significant harm, plan and agree actions to safeguard the child, and determine which information to share with the family.

The decision may then be taken to convene a child protection conference to: bring together and analyse information in an inter-agency setting, make judgments about the likelihood of a child suffering significant harm in the future, and decide whether further action is needed to safeguard and promote the welfare of the child. Parents and their child/children will be invited to this.

There is no longer a 'child protection register'. Instead, the conference will produce a **child protection plan**, which is designed to:

- Identify the risks and how the child can be protected
- Establish short and long term aims and objectives to reducing risk
- Clarify who is responsible for what actions
- Outline ways of monitoring and evaluating progress

A key worker will be appointed, and all relevant professionals (known as the core group) are jointly responsible for the child protection plan and must meet again within 10 days of the conference. Reviews are then held three months, and then six months on.

The EFI Group's Nominated Safeguarding Governor takes governor responsibility for safeguarding arrangements at our Group. The Nominated Safeguarding Governor is Kim Longman, Chair of Governors.

24 – Safeguarding – Working Practice:

Guidance for staff:

Aims: To establish a safe and responsive environment, which safeguards the students and reduces the risk of staff being unjustly accused of improper or unprofessional conduct.

Guidance: This guidance applies to all members of staff (delivery, non-delivery and temporary staff) agency workers, volunteers and, where relevant,

Governors and other visitors to EFI Group colleges. References to members of staff should be read as references to all the above-listed persons. Please note members of staff whose practice deviates from this guidance, or their professional code of conduct, may bring into question their suitability to work with children and young people.

Duty of Care: All members of staff are accountable for the way they exercise authority, manage risk, use resources and safeguard the students, and have a duty to keep the students safe and to protect them from sexual, physical and emotional harm. This duty of care is not a duty to ensure that no harm will ever occur, but rather a duty to take reasonable care to avoid harm being suffered. This duty of care exists when in the EFI Group facilities with students, and if staff encounter students at public or private events (in these cases the member of staff must inform the Director of Student Services & Safeguarding as soon as is reasonably practical about any interaction).

It requires the member of staff to take such measures as are reasonable in all the circumstances to protect students from risks of harm that reasonably ought to be foreseen. This requires not only protection from known hazards, but also protection from harm that could foreseeably arise and against which preventative measures can be taken. Failure to do so may be regarded as neglect. In discharging their duty of care responsibilities, members of staff must exercise their professional judgement to achieve a balance between ensuring that students do not face an unreasonable risk of harm and encouraging students' independence and maximising learning opportunities.

The duty of care is in part exercised through the development of respectful and caring relationships between staff and students. It is also exercised through the behaviour of staff, which at all times should demonstrate integrity, maturity and good judgement.

Confidentiality: Members of staff may have access to confidential, highly sensitive and/or private information about students in order to undertake their responsibilities. These details must be kept confidential at all times and only shared when it is in the interests of the student to do so. If any such person is in any doubt about whether to share information or keep it confidential, he or she should seek guidance from a senior member of staff or the DSL. Every such person must understand the importance of not promising to keep secrets, neither should they request this of a student under any circumstances. Additionally, concerns and allegations about other members of staff should be treated as confidential and passed to the Principal without delay. For fuller guidance on dealing with allegations against staff, please refer to the Allegations of Abuse Against Staff Policy.

Contextual Safeguarding: means assessments of children should consider whether wider environmental factors are present in a child's life that are a threat to their safety and/or welfare. Children's social care assessments should consider such factors, so it is important that the college DSL provides as much information as possible as part of the referral process. This will allow any assessment to consider all the available evidence and the full context of any

abuse. Guidance can be found at: <https://contextualsafeguarding.org.uk/>

Data Protection: Processing, storing and using data appropriately are vitally important in safeguarding children. GDPR does not prevent, or limit, the sharing of information for the purpose of keeping children safe. Legal and secure information sharing between colleges, Children's Social Care, and other local agencies, is essential for keeping children safe and ensuring they get the support they need. Information can be shared without consent if to gain consent would place a child at risk. Fears about sharing information must not be allowed to stand in the way of promoting the welfare and protecting the safety of children. As with all data sharing, appropriate organisational and technical safeguards should still be in place.

Whistleblowing: Staff and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in the Group's safeguarding regime. Concerns should be raised with the Director of Student Services & Safeguarding in the first instance, and then the Principal & CEO, before escalating to the Chair of Governors if necessary. Where a staff member feels unable to raise an issue with their employer or feels that their genuine concerns are not being addressed, other whistleblowing channels may be open to them.

General guidance can be found at: <https://www.gov.uk/whistleblowing>

The NSPCC whistleblowing helpline is available for staff who do not feel able to raise concerns internally regarding child protection failures.

Staff can call: 0800 028 0285 – line is available from 8am to 8pm, Monday to Friday or email: help@nspcc.org.uk.

Allegations Against Students: Allegations against students will be taken very seriously and will be investigated fully using the procedures above. A student against whom an allegation of abuse has been made may be suspended from college during the investigation and the Group's policies on Behaviour, Response to sexual violence and sexual harassment and other relevant areas, will apply. A bullying incident will be treated as a child protection concern when there is reasonable cause to suspect that a child is suffering or likely to suffer significant harm.

Multi-Agency Working: EFI Group work closely with the three local safeguarding partners, which are the local authority, a clinical commissioning group, and the local Chief Officer of Police. They work with relevant agencies to safeguard and promote the welfare of children and young people.

Referral guidelines for the Designated Safeguarding Lead (DSL): The DSL (or Deputy) will contact outside agencies such as the Local Authority Child Protection Team immediately of the disclosure or suspicion of abuse.

- Staff **must** report all allegations **immediately** to the DSL (or Deputy).

- In the absence of the DSL, Director of Delivery and Principal, or in cases where the Principal is the subject of the allegation or concern, the Chair of Governors will receive the report.
- Children who have suffered or who are at risk of suffering serious harm will be reported to the Local Authority Protection Team immediately.
- For situations in which children who are in need of additional support from one or more agencies, guidance will be led by inter-agency assessment using local processes.
- The DSL will inform the parents or guardians, if appropriate, and record responses, statements and observations in connection with the alleged abuse.
- Staff will be informed of the need to monitor the student concerned. However, there will not be a disclosure of information.
- Other agencies, including the police, will be informed, where and when necessary (Contact Centre for Local Authority Advice for Academies and Colleges: **08456 009009**; for **LCBT: Westminster MASH Team: 020 7641 4000**, **Out of hours – 020 7641 6000**; for **FRA/EFIT: 020 7332 3621/1620/3394**, **Out of hours - 020 8356 2346/2710**), following the phone call with a written referral.

The action to be taken will take into account:

- The procedures published by the Local Safeguarding Children Partnership for Kensington and Chelsea & Westminster (LSCP) [LCBT] and the City of London & Hackney (LSCP) [FRA/EFIT], as published and regularly updated on their website (likewise for other Local Authorities).
- The nature and seriousness of the suspicion/complaint. A complaint involving a serious criminal offence will always be referred to the Local Authority or police without further investigations within the Academy.
- The wishes of the student who has complained, provided that the student is of sufficient understanding and maturity and properly informed. However, there may be times when the situation is so serious that decisions may need to be taken, after all appropriate consultation, that overrides a student's wishes.
- The wishes of the complainant's parents, provided they have no interest which is in conflict with the student's best interests and that they are properly informed. Again, it may be necessary, after all appropriate consultation, to override parental wishes in some circumstances. If the DSL is concerned that disclosing information to parents would put a child at risk, they will take further advice from the relevant professionals before making a decision to disclose.
- Duties of confidentiality, so far as applicable.
- The lawful rights and interests of the EFI Group community as a whole including its employees and its insurers.
- If there is room for doubt as to whether a referral should be made, the DSL may consult with the local authority on a "no names" basis without identifying the family. However, as soon as sufficient concern exists that a

child may be at risk of significant harm, a referral will be made without delay. If the initial referral is made by phone, the DSL will confirm the referral in writing within 24 hours. If no response or acknowledgement is received within three working days, the DSL will contact Social Services again.

A referral to the Social Services or police will *not* normally be made where:

- the complaint does not involve a serious criminal offence;
- a referral is contrary to the wishes of a student complainant of sufficient maturity and understanding and properly informed, and contrary also to the wishes of the complainant's parents; and
- the case is one that can be satisfactorily investigated and dealt with under the EFI Group's internal procedures, the parents being kept fully informed, as appropriate.

However, if during the course of the internal procedures, it appears that the situation is more serious, the DSL will again consider whether a referral should be made.

External Agencies: Whether or not the EFI Group decides to refer a particular complaint to Social Services or the police, the parents/carers and student will be informed of their right to make their own complaint or referral to the relevant Social Service Department or the Child Protection Unit of the police and will be provided with contact names, addresses and telephone numbers, as appropriate.

Historical Abuse Allegations: Any historical abuse allegations will be reported to the police, in line with current regulations and guidelines.

Appendix 2: New Staff introduction handout

What is a child: In England, Northern Ireland and Wales, a child is someone who has **not yet reached** their 18th birthday. Once they turn 18, they are legally an adult.

What is safeguarding: Safeguarding is the action that is taken to promote the welfare of children and protect them from harm.

Safeguarding means:

- protecting children from abuse and maltreatment
- preventing harm to children's health or development
- ensuring children grow up with the provision of safe and effective care
- acting to enable all children and young people to have the best outcomes.

Child protection: Child protection is part of the safeguarding process. It focuses on protecting individual children identified as suffering or likely to suffer significant harm. This includes child protection procedures which detail how to respond to concerns about a child.

What is abuse: Child **abuse** is when a child is intentionally harmed by an adult or another child – it can be over a period of time but can also be a one-off action. It can be physical, sexual or emotional and it can happen in person or online. It can also be a lack of love, care and attention – this is neglect.

Spotting the signs: Some **common signs** that there may be something concerning happening in a learner's life include:

- unexplained changes in behaviour or personality
- becoming withdrawn
- seeming anxious
- becoming uncharacteristically aggressive
- lacks social skills and has few friends, if any
- poor bond or relationship with a parent
- knowledge of adult issues inappropriate for their age
- running away or going missing
- always choosing to wear clothes which cover their body.

These signs don't necessarily mean that a learner is being abused, there could be other things happening in their life which are affecting their behaviour – but we can help you to assess the situation. You may also notice some concerning behaviour from adults who you know have learners in their care, which makes you concerned for the learners' safety and / or wellbeing.

For more information and guidance:

<https://www.rbkc.gov.uk/lscb/information-professionals-and-volunteers/what-abuse-and-neglect>

The NSPCC helpline can be contacted if you have any concerns about a child and would like more information. The number is: 0800 800 5000

Important Contacts:

Role	Person
Principal & CEO	Lee Lucas
Chair of Governors & Link Safeguarding Governor	Kim Longman via the Principal's Office
Director of Student Services & Safeguarding Senior DSL	Kelly Barry safeguarding@efigroup.ac.uk
Head of Personal Progression Group Operational DSL	Heidi Gjertsen safeguarding@efigroup.ac.uk
Head of Learning Progression Designated Safeguarding Lead	Terry Delaney learningsupport@efigroup.ac.uk
Head of Safeguarding, LCBT Designated Safeguarding Lead	Elaine Holt LCBTSafeguarding@efigroup.ac.uk
Safeguarding Co-ordinator Designated Safeguarding Lead	Megan Davies FRAsafeguarding@efigroup.ac.uk
Safeguarding Officer Designated Safeguarding Lead	Elay Rahmany FRAsafeguarding@efigroup.ac.uk
Wellbeing Team Manager Designated Safeguarding Lead	Abigail Gard wellbeing@efigroup.ac.uk
Counselling Manager Designated Safeguarding Lead	Dana Chotiros counselling@fra.ac.uk
Deputy Designated Safeguarding Leads FRA - Jade Butler, Otavio Lopes (Wellbeing Officers)	FRWellbeing@efigroup.ac.uk FRASafeguarding@efigroup.ac.uk
LCBT - Mary Mante, Pastoral Support Officer; Bianca Godwin, Learning & Safeguarding Officer; Sammie Jasmine Mills, Stakeholder Engagement Manager; Chantelle Camp, Stakeholder Engagement Officer	LCBTSafeguarding@efigroup.ac.uk LCBTWellbeing@efigroup.ac.uk

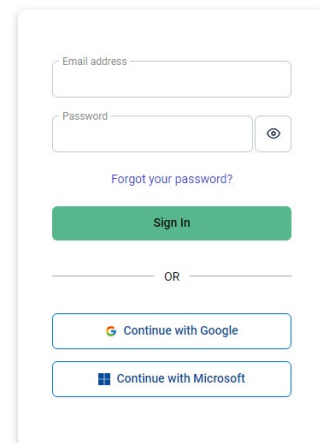
Appendix 3 – Safeguard Software guide:

Please report your concerns **directly, clearly and factually** using the Safeguard concern reporting system. This must be completed as soon as possible and absolutely by the end of the working day at the very latest. When created, the concern will be sent directly to all the DSLs.

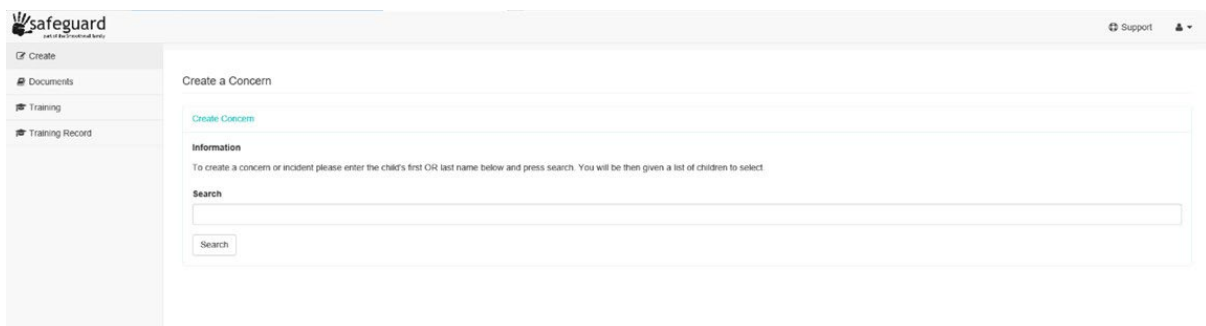
1. Visit -

<https://app.safeguard.software/auth.asp?page=login>

- If it is your first time logging in, use your staff email address and click forgotten password. This will prompt a reset password link to be sent to your email address (this may go into junk)
- If you are having trouble logging in, email FRAsafeguarding@efigroup.ac.uk or LCBTsafeguarding@efigroup.ac.uk and a member of the team will get back to you on the same working day



2. Once you are logged in, to raise a safeguarding concern you can search for the student by name.



3. Select the student for whom you wish to raise a concern for from the list that appears.

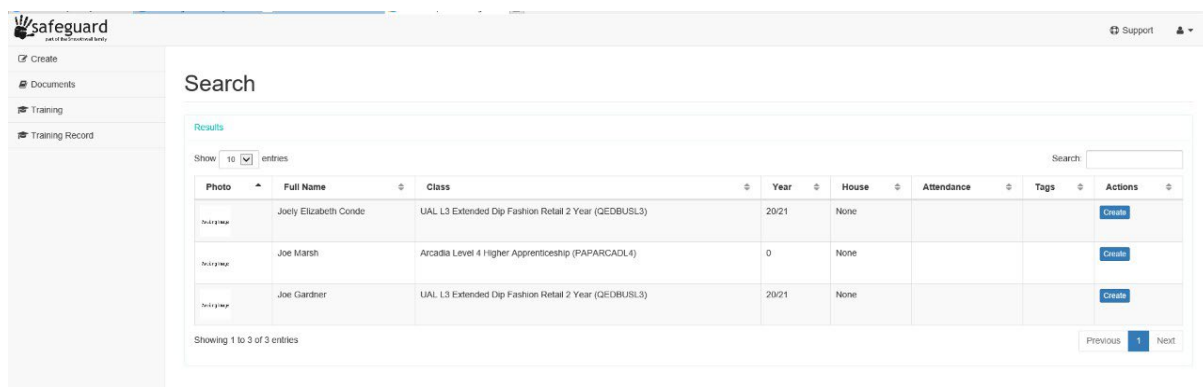


Photo	Full Name	Class	Year	House	Attendance	Tags	Actions
	Joely Elizabeth Conde	UAL L3 Extended Dip Fashion Retail 2 Year (QEDBUSL3)	20/21	None			Create
	Joe Marsh	Arcadia Level 4 Higher Apprenticeship (PAPARCADL4)	0	None			Create
	Joe Gardner	UAL L3 Extended Dip Fashion Retail 2 Year (QEDBUSL3)	20/21	None			Create

4. Fill out the form that appears.

- a. You can tick one of the categories that appear, but if you are unsure then you can leave this part blank.
- b. The important part is the details of the **concern**. Type your concern or the disclosure into the 'concern' box, remembering to stick only to facts and observations. Do not state opinions.
- c. If applicable add any other staff members or children/students were involved.
- d. Be sure to note the time of the disclosure/incident and any other key dates or times. When you create the concern, all DSL's will be notified.

Safeguarding Concern

Information

To create a concern please type the concern and enter the names of any staff members involved. The concern must be factual and not contain your opinions or analysis. Avoid using terms such as 'I think.' and 'In my opinion.', opting for terms such as 'He has.' and 'She is.'. Please remember that you are potentially writing a legal document. Remember once added it cannot be altered or erased.

Categories

You can select any number of categories, if you leave this blank it will be categorised as 'Other'. You can hover your mouse over any of these to see more information.

<input type="checkbox"/> Allegation of sexual assault	<input type="checkbox"/> Child Sexual Exploitation	<input type="checkbox"/> Emotional Abuse
<input type="checkbox"/> Bereavement	<input type="checkbox"/> Covid-19	<input type="checkbox"/> Fabricated / Induced Illness
<input type="checkbox"/> Child Criminal Exploitation	<input type="checkbox"/> Covid-19 - Confirmed Case	<input type="checkbox"/> Female Genital Mutilation
<input type="checkbox"/> Child on Child Abuse	<input type="checkbox"/> Covid-19 - Welfare Check	<input type="checkbox"/> Gang Related Involvement
<input type="checkbox"/> Child on Child Sexual harassment (including online)	<input type="checkbox"/> Domestic Abuse	<input type="checkbox"/> Grooming
<input type="checkbox"/> Child on Child Sexual violence (including online)	<input type="checkbox"/> Drugs / Alcohol	<input type="checkbox"/> Harmful Sexual Behaviour
<input type="checkbox"/> Inappropriate (Online)	<input type="checkbox"/> Radicalisation	
<input type="checkbox"/> Mental Health	<input type="checkbox"/> Self Harm	
<input type="checkbox"/> Neglect	<input type="checkbox"/> Sexual Abuse	
<input type="checkbox"/> Online Abuse	<input type="checkbox"/> Trafficking	
<input type="checkbox"/> Operation Encompass Report		
<input type="checkbox"/> Physical Abuse		

Concern

Were any other staff members involved?

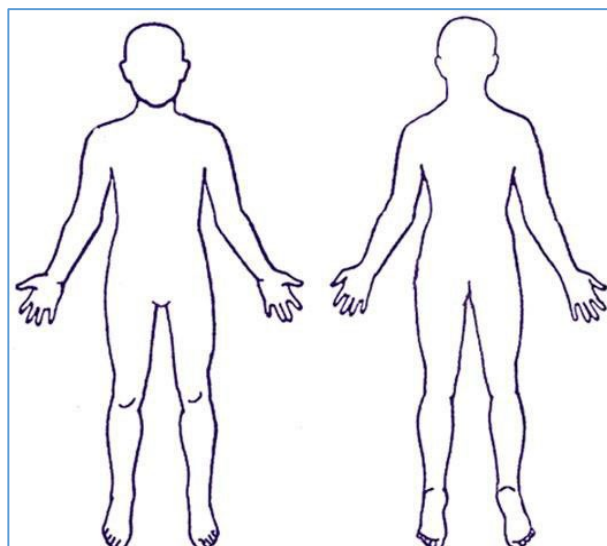
Include Other Children

Notify Staff - Would like to notify someone else such as the class teacher or head of year?

Select staff members to notify

Manual Date

5. You will then be presented with the options: **Return to Dashboard** or **Add Body Map**. If you have noticed any marks, bruises or cuts then you can add these to a body map which will then be applied to the concern.



Good Practice checklist:

- Make sure the subject is safe
- Never promise complete confidentiality. Be clear that you have a duty to report anything that you consider is evidence that someone is at risk, whether that be a student, a member of their family, or another third person.
- In the case of a disclosure, assure the subject they will be taken seriously and reassure them.
- Record the facts of the observation/disclosure and clearly mark any statements of opinion. Do not make judgements, you only need to report.
- In case of injury, seek medical treatment if it is required urgently, but be conscious of not disturbing or destroying potential evidence.
- If a crime has been committed, check whether the police have been contacted.
- Do not discuss your report with anyone else, particularly any alleged perpetrator.
- Report to a Designated Safeguarding Officer, directly, not by email, by the end of the working day