



Teitl: Title:	Safeguarding Children, Young People and Adults at Risk
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Cydraddoldeb ac Amrywiaeth / Equality & Diversity

Dolen at Gam 1 Asesu Effaith (ar Gydraddoldeb a'r Gymraeg): / Impact Assessment Stage 1 (Equality & Welsh) link:	Safeguarding Policy EIA
<i>Effaith ar yr Iaith Gymraeg</i> <i>Mae asesiad effaith wedi'i gynnal ar y polisi hwn i ystyried ei effaith ar yr iaith Gymraeg yn unol â Safonau'r Gymraeg (94-104) a Mesur yr Iaith Gymraeg (Cymru) 2011.</i>	<i>Welsh Language Impact</i> An impact assessment has been carried out on this policy to consider its effect on the Welsh Language in accordance with the Welsh Language Standards (94-104) and the Welsh Language (Wales) Measure 2011.

Adolygu a Chymeradwyo / Review and Approval

Perchennog y Ddogfen: Document Owner:	Head of Learner Services		
Ymgynghoriad / Consultation:	Safeguarding Group		
Dyddiad cymeradwyo / Date Approved	Cymeradwyaeth y Pwyllgor Mewnol e.e. Grŵp Diogelu / Internal Committee Approval e.g. Safeguarding Group	<i>Safeguarding Group March & May 2023</i>	
	Pwyllgor Cyfathrebu a Diwylliant / Communications & Culture Committee:	<i>26th April 2023</i>	
	Pwyllgorau'r Bwrdd / Board Committees:	Pwyllgor Archwilio a Risg / Audit & Risk Committee:	<i>N/A</i>
		Pwyllgor Cwricwlwm a Safonau / Curriculum & Standards Committee	<i>N/A</i>
		Pwyllgor Cyllid, Pobl a Diwylliant / Finance, People & Culture Committee:	<i>25th May 2023</i>
	Corff Llywodraethu / Governing Body:	<i>21st June 2023</i>	
Dyddiad Adolygu: Review Date:	June 2024		

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Rhifwch bob adran a pharagraff
Please number each section and paragraph

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Safeguarding Children, Young People and Adults at Risk Policy

1. Purpose

Coleg Cambria is committed to providing a safe environment for all its learners. The commitment to safeguarding children, young people and adults at risk is guided by prevailing legislation and current guidance from the Regional Safeguarding Boards in accordance with [The Wales Safeguarding Procedures 2019](#) and both the Welsh Government's statutory guidance [Keeping Learners Safe](#) and reflecting the provision of our curriculum, [Keeping Children Safe in Education](#) (Department for Education). Coleg Cambria will comply with the requirements of The Wales Safeguarding Procedures 2019 and statutory guidance working in cooperation with other agencies to ensure the safety and welfare of its learners in all learning environments, including outreach centres, work based learning and accommodation at Llysfasi.

This policy aims to provide all colleagues with the necessary information to enable them to meet their safeguarding responsibilities and to ensure consistent good practice.

2. Scope

The College has a moral and statutory duty to safeguard and promote the welfare of children, young people and adults at risk. We endeavour to provide a safe and welcoming environment where all learners are respected and valued and are able to recognise when they are at risk and know how to access help when it is needed. This policy and procedure sets out the College's arrangements for safeguarding and applies to all aspects of our work and to everyone working for the College including permanent & temporary employees, agency workers, contractors, volunteers and Governors.

3. Key Principles

The College holds as one of its highest priorities the health, safety and welfare of all children, young people and adults at risk involved in courses or activities which come under the responsibility of the College. In safeguarding and promoting the welfare of children, young people and adults at risk we will therefore:

- Take a preventive approach to protecting children, young people and adults at risk from potential harm or damage.

- Take all appropriate actions to address concerns about the welfare of children, young people and adults at risk.
- Work to agreed local policies and procedures in full partnership with other local agencies contributing to multi-agency working in line with statutory guidance.
- Work with social care, the police, health services and other services to promote the welfare of children & young people and adults at risk to protect them from harm.
- Plan, implement, monitor and review policies and procedures to ensure that the maximum is done to provide a safe environment for children, young people and adults at risk in the college.
- Take all reasonable measures to ensure that the risk of harm to the welfare of children, young people and adults is minimised by appropriate:
 - Risk assessment and management
 - Health and Safety procedures
 - Staff selection, recruitment, induction, supervision and training
 - Creation and promotion of an open work culture
 - Promotion and training on the Whistleblowing Policy
 - Mechanism to report concerns.
- Make the Safeguarding Policy & Procedure available on the College website.
- Review the Safeguarding Policy & Procedure annually, or as events and legislation changes and submit for approval by the full governing body.

4. **Definitions**

The term “child” refers to any person under the age of 18 years (Children's ACT 1989 and Section 3 of the Social Services and Well-being (Wales) Act 2014). It therefore refers to all learners up to the age of 18 years.

Within the policy **the term 'young person'** is used, recognising that the majority of learners have reached the minimum school leaving age (MSLA) of 16 when they join the College.

The term “Child at Risk” describes an individual up to the age of 18 years who is experiencing or is at risk of abuse, neglect or other kinds of harm; and who has needs for care and support (whether or not the authority is meeting any of those needs).

The term “Adult at Risk” refers to any person aged 18 years and over who is or may be in need of community care services by reason of mental or other disability, age, illness and

who is, or may be unable, to take care of themselves, or is unable to protect themselves against significant harm or serious exploitation.

Where reference is made to learners in this document it includes both children and adults.

5. **Responsibilities**

The College will ensure the learners feel secure and are listened to, and that they know whom they can approach if they are worried or in difficulty.

The Governing Body is committed to ensuring that the College:

- Designates an independent member of the governing body as a Link Governor for Safeguarding
- Raises awareness of issues relating to safeguarding and promoting the welfare of children, young people and adults at risk in the College
- Provides a safe environment for children, young people and adults at risk
- Identifies children, young people and adults at risk who are suffering or are at risk of suffering significant harm and takes appropriate action to see that such learners are kept safe at the College
- Has a procedure for reporting and dealing with allegations of abuse against members of staff, other learners and volunteers
- Operates safe recruitment procedures
- Designates a member of staff with sufficient authority to take lead responsibility for child protection, safeguarding and the Prevent duty
- Remedies any deficiencies or weaknesses with regard to safeguarding arrangements that are brought to the Governing Body's attention

The Designated Governor will also be responsible for overseeing liaison with appropriate agencies in connection with safeguarding allegations against a Senior Post Holder. This will not involve undertaking a formal investigation, but will ensure communication between parties and provide information to assist enquiries.

The Deputy Chief Executive (People Experiences and Culture) has overall responsibility for safeguarding within the College and is supported by the Head of Learner Services who is the Designated Safeguarding Person (DSP), with the Safeguarding Coordinator acting as a Deputy Designated Safeguarding Person (DDSP).

The Designated Safeguarding Person (DSP) is responsible for safeguarding, child protection and Prevent within Coleg Cambria and must:

- Ensure that all staff and volunteers receive training and regular updates on recognising, responding and reporting concerns, at least every two years
- Act as a single point of contact for external agencies, including the regional safeguarding board (North Wales Safeguarding Board) and the local authorities multi-agency safeguarding hub (MASH)
- Have involvement where a Care and Support Protection Plan is in place for a young person
- Submit an annual report to the governing body which reviews how the duties have been discharged, including staff training and any recommendations
- Ensure that the recruitment of staff (permanent and temporary) and use of volunteers meets safer recruitment guidelines, including the use of the Disclosure and Barring Service (DBS) and Education Workforce Council requirements
- Ensure that all staff and volunteers receive training and regular updates on recognising, responding and reporting concerns and that a training record is kept. Refresher training must take place at least every two year
- Ensure that new staff and volunteers receive training as part of a wider induction on safeguarding procedures within the college and have access to this policy document
- Ensure the mechanisms exist to ensure that the use of temporary and agency staffing comply with the colleges safeguarding responsibilities and procedures

Deputy Designated Safeguarding Person (s) must

- Ensure that applicants with a disclosed criminal conviction are appropriately and robustly assessed by investigating disclosures and assessing associated risks to both self and others based on their application to study
- Liaise with employers and training organisations that receive students from the college on short or long term placements (apprentices, traineeships, supported interns and work placements) to ensure that appropriate safeguarding procedures are operational
- Ensure a safe online environment by filtering and monitoring activity using appropriate software and investigating any online incident reporting logs
- Ensure that all safeguarding concerns are recorded accurately and securely in line with data protection regulations

- Liaise with the North Wales Safeguarding Board and the local authorities multi-agency safeguarding hub (MASH) as appropriate

The Welfare Officers have responsibility for:

- Providing frontline contact for the reporting of safeguarding concerns
- Provide advice, supporting and training to staff and students
- Refer cases of suspected abuse, allegations of abuse or incidents of harm to the relevant agencies
- Maintain accurate records of any safeguarding referral, complaint or concern (even when that concern does not lead to a referral) in line with data protection regulations
- Deal with individual cases, including attending case conferences and review meetings as appropriate
- Keep the Safeguarding Coordinator and DSP informed about all cases of suspected abuse, allegations of abuse or incidents of harm

The Registered Manager – Llysfasi Hostel is responsible for the safeguarding of residential students and for ensuring that reporting processes fulfil requirements under the Care Inspectorate Wales (CIW). The Registered Manager must notify the Responsible Individual for the service immediately.

Person in Charge – ToyBox Nursery - The designated Person in Charge of the Toy Box Nursery is responsible for the safeguarding of children attending the nursery and holiday playscheme and for ensuring that reporting processes fulfil requirements under the Care Inspectorate Wales (CIW). The setting will have its own policy in relation to safeguarding children, in line with the requirements of its registration.

The Person in Charge must notify the Responsible Individual for the service immediately.

All colleagues at the College have a collective and individual duty of care to ensure that a safe environment is provided in which children, young people and adults at risk can learn. It is the responsibility of all colleagues to familiarise themselves with this Policy and the Procedures that go with it and immediately report any concern, no matter how small or trivial it may seem.

Anyone who works for the College must inform their manager if they or any adult living in their household become(s) the subject of an allegation involving a safeguarding concern or abuse against a child, young person or adult at risk . If anyone is in doubt whether the situation or allegation is relevant they should seek advice from the Designated Safeguarding Person.

The College also has a number of colleagues who undertake safeguarding responsibilities as part of their substantive roles as Welfare Officer , and who manage safeguarding referrals and take action in line with the College procedure. A list of the Welfare Officers are provided in Appendix 2

The College works with appropriate agencies to ensure that children, young people and adults at risk are safeguarded through the effective operation of the College's safeguarding children and adults at risk procedures.

All colleagues are required to follow the Safeguarding Children, Young People and Adults at Risk procedures.

The HR Team are responsible for ensuring that the College's recruitment and selection procedures are conducted in accordance with [Keeping Learners Safe](#) guidance and ensuring that all appropriate checks, including both enhanced Disclosure and Barring Service (DBS) checks and checks of the "barred lists" maintained by the Disclosure and Barring Service, are carried out on new colleagues, volunteers and governors who will work or come into contact with children, young people and adults at risk.

As an employer of registered persons the College is responsible for referring cases of alleged unacceptable professional conduct, serious professional incompetence and a relevant offence to the Education Workforce Council (EWC). In accordance with the EWC (Main Functions) (Wales) Regulations 2015, the college has a duty to refer cases where it dismissed a registered person, or might have dismissed a registered person had they not resigned. The HR Team are responsible for making such referrals

The College will, through the DSP, refer all concerns or allegations of abuse promptly to the appropriate agencies, maintaining confidential and secure records of all such referrals.

Where abuse is known to have occurred, the College will endeavour to provide appropriate support to the learner concerned, either directly or by referral. If a child to child allegation is made, then each child is supported by an advocate from the Student Services Team whilst investigations are carried out.

The College recognises that learners, in particular those who are at risk by virtue of their age, disability or illness may be at risk of experiencing, or have experienced abuse. The College provides appropriate guidance and education to learners about abuse, and the prevention of this, through its pastoral support system.

The College requires all learners to disclose information about criminal proceedings if the outcome is such a case would impact on the vocational area they are studying in relation to children or adults at risk. This information is treated in the strictest confidence, however, the College may need to act on the information given and advise other agencies. Alternatively, via case conferences and strategy meetings with external agencies (police, social services etc) the College may be told information which brings into question the suitability of a learner on a specific programme. If this is the case then the learner will be invited into discussions and the Policy for Unspent Criminal Disclosures will be followed.

6. Training and Development

Members of the Governing Body, Senior Post Holders and all colleagues who work with children, young people and adults at risk, are required to undertake training to equip them to carry out their responsibilities for safeguarding children, young people and adults at risk effectively.

All colleagues and members of the governing body are required to complete mandatory safeguarding training (e-learning) prior to commencing at the College and after that every two years. This training is supplemented by onsite training events and safeguarding and protection updates and staff meetings.

Colleagues who have assigned Safeguarding responsibilities are required to complete identified Level 2 Training every two years. The Designated Safeguarding Person and Deputies are required to undertake specific role related training every two years.

Through the tutorial programme all students are required to complete safeguarding modules which include, British Values, Prevent & Radicalisation, Peer on Peer Abuse, and Online Safety.

7. Information Sharing

All colleagues will understand that safeguarding issues warrant a high level of confidentiality. Colleagues should only discuss concerns with the Safeguarding Team. That person will then decide who else needs to have the information and they will disseminate it on a 'need-to-know' basis.

Safeguarding information will be stored and handled in line with the College's Information Retention Schedule for 20 years. Information sharing will take place in a timely and secure manner and where necessary and proportionate to do so the information will be relevant, adequate and accurate.

Information sharing decisions will be recorded, whether or not the decision is taken to share. Any safeguarding in electronic format will be password protected and only made available to relevant individuals.

The DSP will obtain consent from the learner and/or parents to share sensitive information within the college or with outside agencies. Where there is good reason to do so, the DSP may share information without consent, and will record the reason for not obtaining consent.

Colleagues must not disclose information relating to a student, their welfare or personal information without express authorisation to do so from the Designated Safeguarding Person (DSP) or Deputy Designated Safeguarding Person. This stipulation includes where a colleague may receive an information request from a parent, guardian or the police. The police are required to provide the college with a completed Personal Data Request Form.

Whilst the college has a duty to comply with the General Data Protection Regulation (GDPR), we will operate in accordance with lawful information sharing for the purposes of protecting and safeguarding students at risk of harm.

8. Work Based Learning and Work Experience

Any student undertaking employment or a work placement in a place of education, health or social care, will be subject to the safeguarding policy and procedure of that employer. This does not mean that our own policy will not also be invoked to ensure the safeguarding and wellbeing of a student.

It is the responsibility of the college, not the employer, to lead any actions, investigation or support associated with the safeguarding of an apprentice or student undertaking a work placement.

The college recognises its duty in vetting and ensuring due diligence in the sourcing and approval of employers for the purposes of work placement activity. The college is responsible for any risk assessment, checking of employer's public liability insurance and monitoring of the work placement.

9 ESFA (Education and Skills Funding Agency) Notification

Colleges receiving annual funding allocations from the Education and Skills Funding Agency (ESFA) for the provision of education to students aged 16 to 18, or any young person aged 19 to 25 subject to an Education Health and Care Plan who requires additional support costing over £6,000, are required through the Conditions of Funding Agreement to inform the ESFA of serious safeguarding incidents.

A notification to the ESFA by the DSP will be made in either of the following circumstances, via the direct enquiries: Enquiries.ESFA@education.gov.uk:

- a safeguarding concern related to sexual violence has been referred to Local Authority children's social care/adult social care and/or the police, or
- an allegation of abuse made against a teacher, lecturer or other member of staff has been referred to the Designated Officer(s) (at the Local Authority).

8. Review

This policy and associated procedure will be reviewed annually and submitted to the Board of Governors for approval. Any changes required during the year in response to legislation and statutory guidance will be discussed with the Governing Body and be added to the policy.

Safeguarding Children, Young Persons and Adults at Risk Procedure

1. Introduction

All colleagues have a collective and individual duty of care to ensure that a safe environment is provided in which children, young people and adults at risk can learn. It is the responsibility of all colleagues to immediately report any concern, no matter how small or trivial it may seem.

The purpose of this Procedure is to set out the actions which must be taken in accordance with statutory guidance and local guidelines, if there is a concern that a child, young person or adult at risk is suffering or is likely to suffer harm.

Abuse and neglect are forms of maltreatment. Somebody may abuse or neglect a child/vulnerable adult by inflicting harm by hitting them or failing to act to prevent harm. Abuse may be committed by adult men or women and by other children and young people.

The Wales Safeguarding Procedures 2019 refers to the categories of abuse and are set out in Appendix 1 of this policy.

2. Reporting Concerns

It is the responsibility of all colleagues working within the College to record and refer concerns regarding the safeguarding of children, young people and adults at risk even if they are just suspicions or overheard rumours. Children, young people and adults at risk can potentially be abused within the family, community, by employees (including those employed to promote their welfare and protection from abuse), visitors, volunteers and fellow students.

If a child, young person or adult at risk speaks to a member of staff about a matter which could amount to abuse, the member of staff should listen carefully, using the following guidelines:

- the child, young person or adult at risk should be allowed to speak without interruption.
- the issue must never be trivialised or exaggerated.
- suggestions must not be made.
- the child, young person or adult at risk should not be coached or led in any way.
- It should be made clear to the child, young person or adult at risk that speaking up was the right thing to do.
- Questions to clarify understanding should be asked without probing or interrogating no matter how well the child, young person or adult at risk is known.
- It must be explained that the issue raised cannot be kept a secret and will need to be referred to safeguarding.
- Emotions such as anger, disgust or disbelief must not be shown as this may stop the person talking if they feel negative feelings are directed towards them.
- Make sure the child, young person or adult at risk knows the matter is being taken very seriously.

- Make the child, young person or adult at risk feel secure and safe without causing them any further anxiety.

If a colleague suspects or is told that abuse of a child, young person or an adult at risk may have taken place they must inform the Safeguarding Team the same day either by verbal referral or by using the [College Safeguarding Referral Form](#) via the Safeguarding Button on Happeo. In the situation that it is a concern regarding female genital mutilation (FGM) the Designated Safeguarding Person (or Deputy) must be informed directly in order that a referral can be made to the police in line with legal obligations.

Upon referral a Safeguarding Officer is responsible for obtaining a full written record of the matters raised within 24 hours from the referring member of staff which will include:

- Name and position of the person who reported the matter.
- Whether the matter is a direct disclosure from a child, young person or vulnerable adult, a suspicion or an overheard conversation.
- A factual account of what has been overheard or what has been disclosed, including any questions which needed to be asked to clarify understanding.
- Details of any observations (including physical signs of apparent abuse).
- The written record must not contain any opinions or personal interpretation of the facts and must be signed and dated by the referring member of staff.

The referring colleague must not discuss the matter with anyone other than a Welfare (Safeguarding) Officer, DDSP or DSP. Detailed information about a case will be confined to the Safeguarding Officer, the DDSP or DSP and (if not implicated), the parents/carers. The colleague submitting the report will be kept informed on the progress of the case on a “need to know basis only”.

3. Allegations against a member of staff

The primary concern of the College is to ensure the safety of the child, young person or adult at risk. It is essential in all cases of suspected abuse by an employee that action is taken quickly and professionally. Within each local authority there is a Designated Officer who has responsibility for providing advice and monitoring the progress of cases relating to children, to ensure matters are dealt with as quickly as possible and consistently with a fair and thorough process.

Colleagues must be aware that inappropriate behaviour towards learners is unacceptable and that their conduct must be beyond reproach. Under the Sexual Offences Act 2003 it is an offence for a person over the age of 18 to have a sexual relationship with a person under the age of 18, where that person is in a position of trust, even if the relationship is consensual. This means that any sexual activity between a member of the college and a learner under 18 may be a criminal offence. The college’s Code of Conduct sets out the expectations of all colleagues .

The College provides advice to staff regarding their personal online activity via the Information Security Policy (sub policy: Acceptable Use Policy) and Social Media Policy. Colleagues found

to be in breach of these rules may be subject to disciplinary action or a safeguarding investigation.

If an allegation of abuse is made against a colleague of the college the DSP will follow the guidelines in Part 5 of The Wales Safeguarding Procedures 2019 and Care in Wales (CIW) requirements.

The DSP will inform the (Local Authority)Designated Officer if an allegation is made which, at face value, indicates an employee of the College has behaved in a way that:

- a criminal offence may have possibly been committed against or related to a child, young person or an adult at risk, or
- has harmed or may have harmed a child, young person or adult at risk, or
- behaved towards a child, young person or adult at risk in a way that indicates they pose a risk of causing harm if they worked with children, or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children, young people or adults at risk.

Allegations concerning employees who no longer work at the college, or historical allegations will be reported to the police.

Colleagues who are concerned about the conduct of a colleague towards a learner are undoubtedly placed in a very difficult situation. They may worry that they have misunderstood the situation and they will wonder whether a report could jeopardise their colleague's career. All colleagues must remember that the welfare of the learner is paramount. All concerns of poor practice or possible abuse by colleagues should be reported to the DSP. All reports or complaints about the CEO or Senior Post Holders should be reported to the Chair of Governors through the DSP who will liaise with the local authority and follow the guidelines in Part 5 of The Wales Safeguarding Procedures 2019 and Care In Wales (CIW).

The Local Authority Designated Officer will determine:

- whether the matter should be treated as an allegation or a complaint if there is a need to undertake preliminary enquiries and, if so, how the enquiries should be conducted or;
- if a Strategy Meeting should be convened whether immediate action to protect a child is required.

A Strategy meeting will be convened where there is suspicion that a child, young person or adult has or may suffer significant harm. This meeting will be attended by the Designated Safeguarding Person/Deputy DSP and a representative from Human Resources. A representative from the Police will also be in attendance if it is believed a criminal offence might have been committed.

An internal investigation/enquiry into the allegation will not take place until consultation has taken place with the Designated Officer or there is an agreed outcome from a Strategy Meeting. The employee against whom an allegation has been made will be informed of the allegation as

soon as possible after the initial consultation with the Designated Officer, or strategy meeting if one is needed, and agreement has been reached on how the matter is to be taken forward.

Arising from the referral to the Designated Officer, the agreed course of action could include:

- no further action.
- a referral back to the College to undertake its own internal investigation. Such investigation will be conducted under the Staff Disciplinary Procedure.
- A decision that a criminal investigation should be conducted. If a crime is suspected, an investigation will not be carried out by the College, other than to establish the facts.

All the information obtained will be handed over to the police who will carry out any investigation necessary, with the support of the College. Where an internal investigation is conducted, the College's DSP will provide feedback on the outcome to the Designated Officer to ensure that even apparently less serious allegations have been followed up and appropriate action taken.

Depending upon the seriousness of the allegation the employee may be suspended on full pay pending conclusion of an investigation. Suspension will not however be the default position, and will only be considered in cases where there is reason to suspect that a child, young person or adult at risk is/are at risk of harm, or the case is so serious that it might be grounds for dismissal.

In such cases, suspension will only take place if we have considered all other options available and there is no reasonable alternative. If the individual against whom the allegation has been made is engaged through an agency, the appropriate course of action will be discussed with the relevant manager at the agency.

If the employee against whom an allegation has been made resigns or ceases to provide their services during an investigation, the allegation will continue to be investigated in accordance with the procedures and a conclusion reached. The Disclosure and Barring Service (DBS) will be notified, in accordance with the statutory duty, if a member of staff is dismissed under this Procedure or resigns before the conclusion of a disciplinary hearing.

The College will keep clear and comprehensive records of any allegations made, details of how the allegation was followed up and resolved, as well as details of any actions taken and decisions reached. These will be placed indefinitely on an employee's confidential personnel file. The file will be retained for 10 years from the date of allegation if the employee leaves employment before the expiry of this period.

When providing employer references, reference will not be made to any allegation that has been proven to be false, unsubstantiated or malicious, or any history of allegations where all such allegations have been proven to be false, unsubstantiated or malicious.

4. Welsh Language

In line with the Welsh Language Standards, all meetings, correspondence and support services that form part of these processes will be offered in Welsh.

Appendix 1

Physical Abuse

Physical abuse is 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. This is referred to as fabricated or induced illness.

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 cyber bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Sexual Abuse

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or 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/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 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.

Peer on Peer Abuse

All colleagues should be aware that children can abuse other children (often referred to as peer on peer abuse). And that it can happen both inside and outside of college and online, and can be an indicator of past or present abuse and/or Trauma. It is important that all colleagues recognise the indicators and signs of peer on peer abuse and know how to identify it and respond to reports. It is essential that all colleagues 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.

Peer on peer abuse is most likely to include, but may not be limited to:

- bullying (including cyberbullying, prejudice-based and discriminatory bullying).
- 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 nude and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery).
- upskirting, where someone takes a picture under a persons clothing (not necessarily a skirt) without their permission and or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is a criminal offence. Anyone of any sex, can be a victim.
- 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).

Sexual Harrassment

When referring to sexual harassment we mean ‘unwanted conduct of a sexual nature’ that can occur online and offline and both inside and outside of school/college. When we reference sexual harassment, we do so in the context of child on child sexual harassment. Sexual harassment is likely to: violate a child’s dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment.

Whilst not intended to be an exhaustive list, sexual harassment can include:

- sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names.
- sexual “jokes” or taunting.
- physical behaviour, such as: deliberately brushing against someone, interfering with someone’s clothes (schools and colleges should be considering when any of this crosses a line into sexual violence - it is important to talk to and consider the experience of the victim) and displaying pictures, photos or drawings of a sexual nature; and
- online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence. It may include:
- consensual and non-consensual sharing of nude and semi-nude images and/or videos.

Serious Violence

Colleagues are made aware of the indicators that learners are at risk from or are involved with serious violent crime. These include increased absence, 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 could also indicate that learners have been approached by or are involved with individuals associated with criminal gangs.

Online safety

The breadth of issues classified within online safety is considerable, but 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 people 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.

Sexting

There is no accepted definition of ‘sexting’ but most professionals agree that it refers to the sending or posting of sexually suggestive images, including consensual and non-consensual nude and semi-nude images and or videos of a person under 18 years of age, via mobiles or over the internet. This can be referred to as ‘youth produced sexual imagery’.

All incidents involving youth produced sexual imagery will be responded to as follows:

- The incident will be referred to the DSP immediately and the DSP will hold an initial review meeting with appropriate staff. If appropriate, there will be subsequent interviews with the young people involved.
- Parents will be informed at an early stage and involved in the process unless there is good reason to believe that involving parents would put the young person at risk of harm.
- At any point in the process, if there is a concern a young person has been harmed or is at risk of harm a referral will be made to children's social care and/or the police immediately in accordance with this policy.
- In some instances, it may be necessary to refer the matter to the police. Once a report is made to the police, the report must be recorded, and the police will investigate. This may include seizure of the devices and interviews with the young people involved.

Child Sexual Exploitation (CSE)

Sexual Exploitation involves an individual or group of adults taking advantage of the vulnerability of an individual or groups of children or young people, and victims can be any gender. Young people are often unwittingly drawn into sexual exploitation through the offer of friendship and care, gifts, drugs and alcohol, and sometimes accommodation. CSE is a serious crime and can have a long lasting adverse impact on a learner's physical and emotional health. It may also be linked to child trafficking. A young person may not recognise the coercive nature of the relationship and doesn't see themselves as a victim. The learner may initially resent what they perceive as interference by staff, but staff must act on their concerns, as they would for any other type of abuse. All concerns should be reported to the DSL immediately.

Honour-Based Violence

'Honour-based' violence (HBV) encompasses crimes which have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation (FGM), forced marriage, and practices such as breast ironing. All forms of HBV are abuse and should be reported immediately to the DSL.

FGM is the collective name given to a range of procedures involving the partial or total removal of the external female genitalia for non-medical reasons. In England, Wales and Northern Ireland, the practice is a criminal offence under the Female Genital Mutilation Act 2003. The practice can cause intense pain and distress and long-term health consequences, including difficulties in childbirth.

FGM is carried out on females of any age, from young babies to older teenagers and adult women, so college staff are trained to be aware of risk indicators. Many such procedures are carried out abroad and staff should be particularly alert to suspicions or concerns expressed by female learners about going on a long holiday during the summer holiday period.

A forced marriage is a marriage in which a female (and sometimes a male) does not consent to the marriage but is coerced into it. Coercion may include physical, psychological, financial, sexual and emotional pressure. It may also involve physical or sexual violence and abuse. In England and Wales the practice is a criminal offence under the Anti-Social Behaviour, Crime and Policing Act 2014. Children may be married at a very young age, and well below the age of consent. College staff are trained and any suspicions or concerns about being taken abroad and not being allowed back into the UK should be investigated. A forced marriage is not the

same as an arranged marriage, which is common in several cultures. Families of both spouses take a leading role in arranging the marriage but the choice of whether to accept the arrangement remains with the prospective spouses.

Radicalisation and Extremism

The government defines extremism as vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. Some learners are at risk of being radicalised: adopting beliefs and engaging in activities which are harmful, criminal or dangerous. Islamic extremism is the most widely publicised form and colleges should also remain alert to the risk of radicalisation into white supremacy extremism. College staff receive training to help to identify signs of extremism. Opportunities are provided in the curriculum to enable learners to discuss issues of religion, ethnicity and culture and the college follows the HM Government Revised Prevent Duty Guidance for England and Wales (July 2015) and Prevent Duty Guidance for Further Education Institutions in England and Wales. This part of Safeguarding should be read in conjunction with the College's Prevent Policy.

Criminal Exploitation

Criminal exploitation is a geographically widespread form of harm that is a typical feature of county lines criminal activity: drug networks or gangs exploiting young people to carry drugs and money from urban areas to suburban and rural areas, market and seaside towns. The main indicator is increased absence during which time the learner may have been trafficked for the purpose of transporting drugs or money. County lines exploitation can affect any child under the age of 18 years. It can still be exploitation even if the activity appears consensual, can involve force and/or enticement-based methods of compliance and is often accompanied by violence or threats of violence. County lines exploitation can be perpetrated by individuals or groups, any gender, and young people or adults and is typified by some form of power imbalance such as age, gender, cognitive ability, physical strength, status and access to economic or other resources.

Money Mules

Colleges are a key recruiting ground for criminals who want to move money through accounts to make it look less suspicious to banks. Young people are given a cut for allowing their account to be used. Often they ask no questions over the source of the money. Most money mules are young men who when they try to quit are often threatened with violence by the criminals who recruited them. Young people are being recruited to illegal activity via social media and often do not understand the consequences of if they are caught they face prison as well as bank account closure and difficulties in the future with finances. The number involved in this activity has grown significantly since 2018.

Grooming

Grooming is when someone builds a relationship, trust and emotional connection with a child or vulnerable adult so they can manipulate, exploit and abuse them. Children and young people who are groomed can be sexually abused, exploited or trafficked. Anybody can be a groomer, no matter their age, gender or race. Signs of grooming can include:

- Paying special attention to the learner.

- Buying gifts for the learner for no reason.
- Offering to buy alcohol or drugs for the learner.
- Spending time with the learner while they are showering, or undressing.
- Talking about sex, and making sexual jokes.
- Touching the learner whilst in the presence of parents/carers to make the victim believe that the abuse is okay. This can be a simple hug.
- The victim does not want to be hugged or touched by the abuser.
- The predator shares common interests with the learner that you know they don't have any interest in.

Private fostering arrangements

A private fostering arrangement occurs when someone other than a parent or close relative cares for a learner under the age of 16 for a period of 28 days or more, with the agreement of the child's parents. It applies to a child under the age of 16 years or aged under 18 if the child is disabled. By law, a parent, private foster carer or other persons involved in making a private fostering arrangement must notify children's services as soon as possible.

Accommodation

Research has shown that children can be particularly vulnerable in residential settings. All accommodation will comply with the National Minimum Standards and will be inspected by Care in Wales (CIW).

APPENDIX 2

Safeguarding Team Members

Martina Davies (Link Governor - Safeguarding)

Cath Sullivan (Executive Management Team Safeguarding Lead)

Karen Senior (Designated Safeguarding Person up to 31 August 2023)

Bethan Charles (Designated Safeguarding Person effective from 1st September 2023)

Casey Watkins (Deputy Designated Safeguarding Person)

Welfare (Safeguarding) Officers;

Daniel Edwards (Bersham Road)

Sue Francis (Deeside)

Holly Downing (Deeside 6th)

Sioned Jones (Llysfasi)

Karen Hill (Northop)

Jordanne Ecclestone (Yale)