



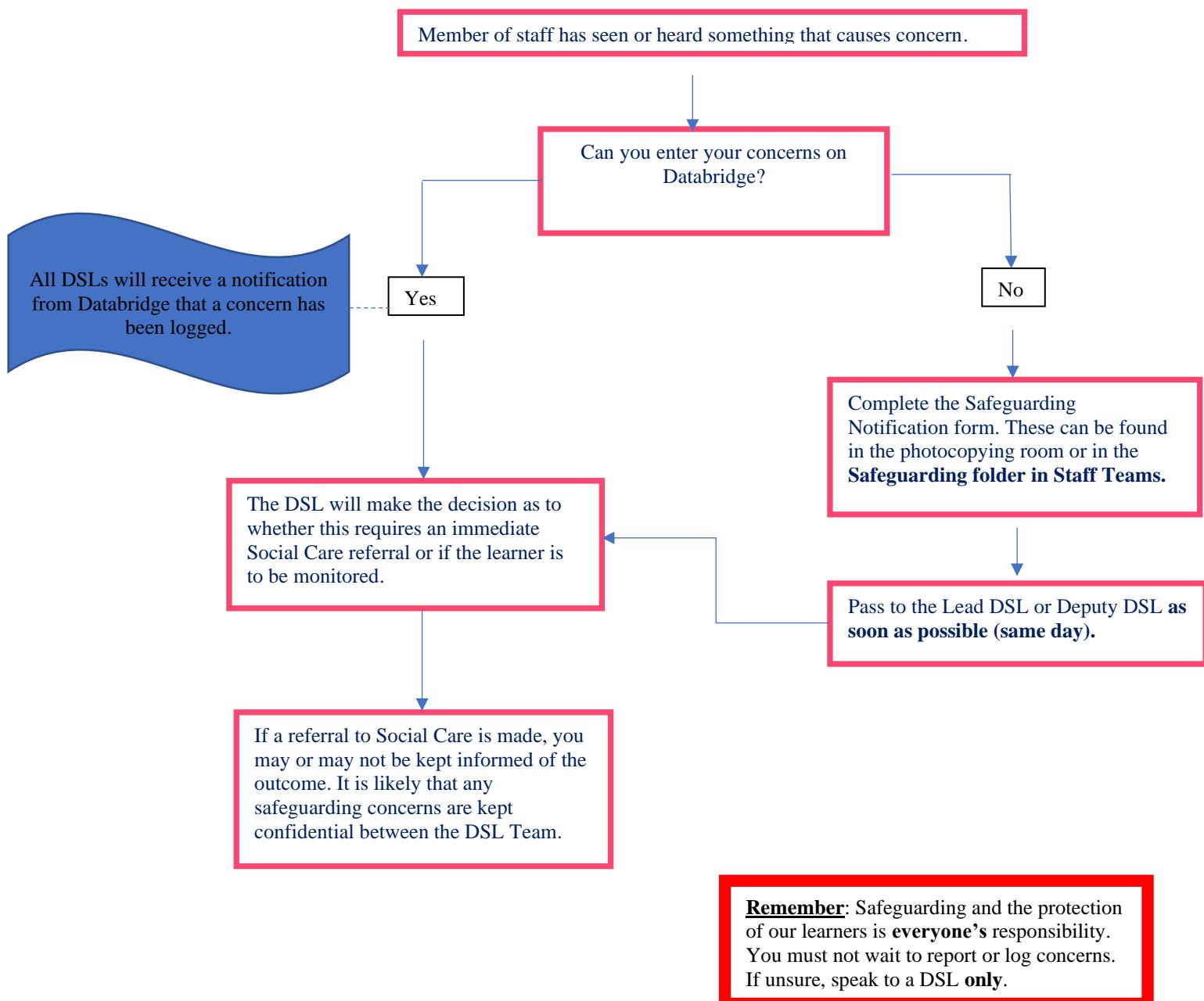
Safeguarding Policy and Procedures

September 2023

Designated Safeguarding Leads: (DSL)
Lead DSL: Ros Leach, Principal
Deputy DSL: Lynsey Ritchie
Quality Assurance: Gordon Tillman
Safeguarding Administrator: John Spavins
Safeguarding Administrator: Nikki Twiner
Safeguarding Administrator: Charlotte Thomas
Designated Safeguarding Trustee: Julie Stones

This is a core policy that forms part of the induction for all staff. It is a requirement that all members of staff have access to this policy and sign to say they have read and understood the policy.

Action to take if you have a welfare concern.



Introduction and Commitment

The Oaks recognises our statutory responsibility to safeguard and promote the welfare of all vulnerable young people, both internally and outside of the College setting. Staff, trustees, parents, carers, families and learners all have an essential role to play in making the College a safe and secure learning environment.

We will maintain an attitude of 'it could happen here' in our College. All learners are respected and encouraged to talk openly.

Our College's core safeguarding principles are:

- We are an important part of the wider safeguarding system for vulnerable learners.
- It is our whole College responsibility to safeguard and promote the welfare of our learners.
- All learners regardless of age, gender, ability, culture, race, language, religion or sexual identity, have equal rights to protection.
- All learners have the right to be heard and to have their wishes and feelings taken into account.
- All learners are protected from risk of abuse or risk of radicalisation and extremism.

All our staff understand safe professional practice, adhere to our safeguarding policies and act immediately should an incident occur that causes concern.

This Policy outlines the procedures The Oaks has in place should a concern be raised that a learner is, or has the potential to be, unsafe.

Definition and underpinning legislation

In line with Keeping Children Safe in Education (KCSIE 2023) safeguarding and promoting the welfare of children is defined for the purposes of this policy as:

- protecting children* from maltreatment
- preventing impairment of children's mental and physical health or development
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care.
- taking action to enable all children to have the best outcomes.

(*for the purposes of this policy we interpret this definition to include our vulnerable young adults).

KCSIE 2023 requires individual settings to have an effective safeguarding policy in place. It has been developed in accordance with the principles established by the Children/Vulnerable young people Acts 1989 and 2004. This includes but is not limited to:

- Keeping Children Safe in Education 2023 (KCSIE)
- Working Together to Safeguard Vulnerable young people 2018 (WTSC)
- Ofsted: Education Inspection Framework (2023)
- Framework for the Assessment of Vulnerable young people in Need and their Families (2000)
- Kent and Medway Safeguarding Vulnerable young people Procedures (Online)
- Early Years and Foundation Stage Framework 2021 (EYFS)
- The Education Act 2002
- Education and Inspections Act 2006
- The Non-Maintained Special Schools (England) Regulations 2015

The core elements to our vulnerable young people protection policy are underpinned by both KCSIE and, due to the age of our learners, the Care Act 2014. Under the Care Act (2014) consideration is given to:

Empowerment	Learners to be supported and encouraged to make their own decisions and informed consent
Prevention	A positive, supportive, safe College culture, curriculum and pastoral opportunities for learners, safer recruitment procedures
Proportionality	Involvement that is the least intrusive and appropriate to the risk presented
Protection	Follow agreed procedures, ensuring all staff are trained and supported to respond appropriately and sensitively to safeguarding concerns
Partnership	Ensure appropriate communications and actions are undertaken
Accountability	Ensure learners understand the role of everyone involved in their life

The procedures contained in this policy apply to all staff (including temporary staff and volunteers) and trustees, and are consistent with those outlined within KCSIE 2023 and the Care Act 2014.

Context

Safeguarding remains a high priority at The Oaks. We remain vigilant to the effects of the Covid-19 pandemic and the exposure of our learners to a range of adversity and trauma including bereavement, anxiety and in some cases increased welfare and safeguarding risks, including potentially increased online activity. We continue to work with local services, such as health and the local authority, to ensure necessary support is in place.

The College acknowledges that safeguarding includes a wide range of specific issues including (but not limited to):

- Abuse and neglect
- Bullying, including cyberbullying
- Learners with family members in prison
- Learners missing education
- Child missing from home or care
- Child Sexual Exploitation (CSE)
- Child Criminal Exploitation (CCE)
- Contextual safeguarding (risks outside the family home)
- County lines and gangs
- The role of an Appropriate Adult
- Domestic abuse
- Drugs and alcohol misuse
- Fabricated or induced illness
- Faith abuse
- Financial Exploitation
- Gender based abuse and violence against women and girls
- Hate
- Homelessness
- Human trafficking and modern slavery
- Mental health
- Nude or semi-nude image sharing, aka youth produced/involved sexual imagery or “Sexting”
- Online safety
- Peer-on-peer abuse
- LGBTQ+ learners and/or those that are perceived to be LGBTQ+
- Preventing radicalisation and extremism

- Private fostering
- Relationship abuse
- Serious violence
- Sexual violence and sexual harassment
- So-called ‘honour-based’ abuse, including Female Genital Mutilation (FGM) and forced marriage
- Up skirting

Related Safeguarding Policies

This policy is one of a series in the College’s integrated safeguarding portfolio and should be read in conjunction with the policies and statements as listed below:

- Behaviour Policy including searching and confiscation
- Online Safety Policy
- Anti-Bullying Policy
- Data Protection and Information Sharing
- Health and Safety Policy
- Attendance Statement
- Staff Code of Conduct
- Staff Handbook
- Whistleblowing

Key Responsibilities

This Policy will be reviewed at least annually by the College.

All staff, including temporary staff and volunteers, and members of the Board of Trustees, will be provided with a copy of this Policy and will have read and will follow KCSIE 2023, Part 1. All polices can be accessed on our website <https://www.theoaks.ac.uk/statements-and-policies>.

Governance and Leadership

- The Board of Trustees and Leadership Team have a strategic responsibility for our safeguarding arrangements and will comply with their duties under legislation.
- The Board of Trustees and Leadership Team have regard to the KCSIE 2023 guidance and will ensure our policies, procedures and training is effective and complies with the law at all times.
- The Oaks has a nominated trustee for safeguarding. The nominated trustee will support the DSL and have oversight in ensuring that the College has an effective policy which interlinks with other related policies, that locally agreed procedures are in place and being followed, and that the policies are reviewed at least annually and when required.
- The Board of Trustees, CEO and Leadership Team will ensure that the DSL is properly supported in their role.
- The Principal will ensure that our safeguarding policy and procedures are adopted by the Board of Trustees, are understood, and followed by all staff.

Safeguarding Team

The Safeguarding Team at The Oaks consists of:

- Ros Leach – Lead DSL inc Prevent and Online Safety.
- Lynsey Ritchie - Deputy DSL
- Gordon Tillman - Quality Assurance
- John Spavins – Safeguarding Administrator
- Nikki Twiner – Safeguarding Administrator
- Charlotte Thomas – Safeguarding Administrator

All staff will be made aware that if they are worried or concerned about themselves, they can speak to the following staff members in confidence:

Teaching Staff – John Spavins

Learning Support Practitioners – Nikki Twiner

Administration/Site Teams – Lynsey Ritchie

There will always be a DSL on College premises throughout the college day.

The Lead DSL has the overall responsibility for the day-to-day oversight of safeguarding and vulnerable young people protection systems in college. The Designated Safeguarding Lead will ensure regular reporting on safeguarding activity and systems in College to the Board of Trustees. The Trustees will not receive details of individual situations or identifying features of families as part of their oversight responsibility.

Each DSL will undergo appropriate and specific training to provide them with the knowledge and skills required to carry out their role. The DSL training will be updated formally every two years, but knowledge and skills will be updated through a variety of methods at regular intervals and at least annually.

The Deputy DSL and administrators are trained to the same standard as the Lead DSL. Whilst the activities of the Lead DSL may be delegated to the Deputy and Administrators, the ultimate responsibility remains with the Lead DSL.

It is the role of the DSL to:

- act as the central contact point for all staff to discuss any safeguarding including radicalisation concerns.
- maintain a confidential recording system for safeguarding and learner protection concerns
- co-ordinate safeguarding action for individual learners and be prepared to communicate with the learner's social worker.
- liaise with other agencies and professionals in line with KCSIE 2023 and WTSC 2018
- ensure that locally established referral procedures are followed as necessary.
- represent, or ensure the College is appropriately represented at multi-agency safeguarding meetings (including Vulnerable young people Protection conferences, CHANNEL Panels), when required.
- manage and monitor the College's role in any multi-agency plan for a learner.
- be available during term time (during College hours) for staff in the College to discuss any safeguarding concerns
- ensure all staff access appropriate safeguarding training and relevant updates in line with the recommendations within KCSIE 2023 and Prevent duties placed on educational settings.

Members of Staff

All members of staff have a responsibility to:

- provide a safe environment and culture in which learners can safely learn.
- understand the college's safeguarding policies and systems and how to raise a concern.
- undertake appropriate training which is regularly updated.
- know what to do if a learner tells them that he or she is being harassed, abused or neglected.
- be able to identify and act upon indicators that learners are at risk of developing mental health issues.
- know how to maintain an appropriate level of confidentiality.
- be aware of the indicators of abuse and neglect so that they can identify vulnerable learners who may need help or protection.

- reassure learners who report concerns that they are being taken seriously and that they will be supported and kept safe.

Learners

Learners have a right to:

- feel safe, be listened to, and have their wishes and feelings taken into account.
- confidently report abuse, knowing their concerns will be treated seriously, and knowing they can safely express their views and give feedback.
- contribute to the development of College safeguarding policies.
- receive help from a trusted adult.
- learn how to keep themselves safe, including online.

Parents and Carers

Parents/carers have a responsibility to:

- understand and adhere to the relevant College policies and procedures.
- talk to their young people about safeguarding and support the College in their safeguarding approaches.
- identify behaviours which could indicate that their vulnerable young person is at risk of harm, including online, and seek help and support from the College or other agencies.

Parents can obtain a copy of the College Safeguarding Policy and other related policies on request and can view them via the College website <https://www.theoaks.ac.uk/statements-and-policies>.

Recognition and Types of Abuse and Neglect

All staff in College should be aware of the definitions and indicators of abuse and neglect. There are four categories of abuse:

- Physical abuse
- Sexual abuse
- Emotional abuse
- Neglect
- Members of staff are encouraged to be aware that learners with SEN and disabilities can be disproportionately impacted by safeguarding concerns such as bullying.
- All members of staff will be encouraged to appropriately explore possible indicators of abuse such as behaviour/mood change or injuries, and not to assume that they are related to the learner's disability and be aware that young people with SEN and disabilities may not always outwardly display indicators of abuse.
- Staff recognise that learners are not always ready or able to talk about their experiences of abuse and/or may not always recognise that they are being abused. Staff will remain vigilant to the behaviours of all learners and will report any changes or concerns to a DSL.
- All staff recognise that concerns may arise in many different contexts and can vary greatly in terms of their nature and seriousness. The indicators of abuse and neglect can vary from learner to learner. Learners develop and mature at different rates, so what appears to be worrying behaviour for one learner might be normal for another. It is important to recognise that indicators of abuse and neglect do not automatically mean a learner is being abused however all concerns should be taken seriously and will be explored by the DSL on a case-by-case basis.
- Staff recognise abuse, neglect and safeguarding issues are rarely standalone events and cannot always be covered by one definition or one label alone. In many cases, multiple issues will overlap with one another, therefore staff will always be vigilant and always raise concerns with a DSL and/or log them on Databridge.
- Parental behaviours can indicate abuse or neglect, so staff will be alert to parent-learner interactions or concerning parental behaviours; this could include parents who are under the influence of drugs or alcohol or if there is a sudden change in their mental health.

- Learners may report abuse happening to themselves, their peers or their family members. All reports made by learners to staff will be taken seriously and will be responded to in line with this policy.

Recognising signs of extremism and radicalisation

The College's approach to the Prevention of Extremism and Radicalisation (Prevent) will focus on:

- safeguarding all learners and staff from exposure to circumstances that exacerbate the risk of radicalisation.
- the education of all learners and staff regarding the risk and nature of radicalisation
- the provision of information and resources that support awareness raising.
- liaising and communication with relevant local and national agencies that support the Prevent agenda including the Prevent Duty Delivery Board
- promotion of the support mechanisms available should a learner or staff member have concerns relevant to terrorist and extremist activity.

All staff should be aware of the signs learners may display if they are being radicalised:

- Isolating themselves from family and friends
- Talking as if from a scripted speech
- Unwillingness or inability to discuss their views
- A sudden disrespectful attitude towards others
- Increased levels of anger
- Increased secretiveness, especially around internet use.

The Oaks recognises that safeguarding incidents and/or behaviours can be associated with factors and risks outside the College.

- Learners can be at risk of abuse or exploitation in situations outside their families; extra-familial harms take a variety of different forms and learners can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, sexual abuse, serious youth violence, radicalisation and county lines.
- Technology can be a significant component in many safeguarding and wellbeing issues. Learners are at risk of abuse online as well as face to face and in many cases, abuse will take place concurrently via online channels and in daily life. Learners can also abuse their peers online.
- By understanding the indicators of abuse and neglect, we can respond to problems as early as possible and provide the right support and services for the learner and their family.

Responding to concerns

The Oaks will ensure that young people with SEN and disabilities, specifically those with communication difficulties, will be supported to ensure that their voice is heard and acted upon.

The Oaks adheres to the KMSAB Safeguarding Vulnerable young people Procedures. The full KMSAB procedures and additional guidance relating to specific safeguarding issues can be found on the [KMSAB website](#)

All members of staff are expected to use their professional curiosity and Look, Listen, Ask, Clarify if there attention is drawn to a potential safeguarding issue.

If staff are made aware of a potential safeguarding concern, including evidence that a learner has engaged in extremist activity, they are expected to:

- listen carefully to the concern and be non-judgemental.
- only use open questions to clarify information where necessary, e.g. who, what, where, when or Tell, Explain, Describe (TED).
- not promise confidentiality as concerns will have to be shared further, for example, with the DSL and potentially local authority services.
- be clear about boundaries and how the report will be progressed.
- record the concern on Databridge.

- inform the DSL (or Deputy), as soon as practically possible.

The role of College staff in situations where there are learner protection concerns is NOT to investigate but to recognise and refer.

The DSL may seek advice or guidance from the learner's social worker, or in the absence of a social worker, from the Front Door. If a concern has been raised in relation to potentially extremist activity or an event that puts the learner at immediate risk, a referral may be made to the Police.

The DSL or the Deputy DSL should always be available to discuss safeguarding concerns. If, in exceptional circumstances, a DSL is not available, this should not delay appropriate action being taken. Staff should speak to a member of the senior leadership team and/or take advice from a social worker. In these circumstances, any action taken will be shared with a DSL as soon as is practically possible.

In all but the most exceptional circumstances, parents/carers will be made aware of the concerns for their young people at the earliest possible stage. In the event of a request for support from Social Services being necessary, parents/carers will be informed and consent to this will be sought in line with guidance provided by KMASB, unless there is a valid reason not to do so, for example if to do so would put a learner at risk of harm and/or it would undermine a criminal investigation.

Once information is passed on to a DSL, staff should feel able to check the progress of a case so that they can reassure themselves that the learner is safe, and their welfare is being considered. If following this process, the staff member remains concerned it is the responsibility of that staff member to follow the College's escalation process.

If a learner's situation does not appear to be improving, then the DSL (or the person that made the request for support) will consider re-referral. Professional disagreements (escalation) will be responded to in line with the KMSAB procedures and DSLs may request support via the Education Safeguarding Service.

Record Keeping

Staff will record any welfare concern that they have about a learner on Databridge. If unable to do so Safeguarding Incident Forms are available in the photocopying room (with a body map if injuries have been observed) and these **must** be passed without delay to a DSL. Records will be completed as soon as possible after the incident/event, using the learner's words and will be signed and dated by the member of staff. If there is an immediate concern the member of staff should consult with a DSL as this needs to take priority.

- All safeguarding concerns, discussions and decisions (and justifications for those decisions) will be recorded in writing. If members of staff are in any doubt about recording requirements, they should discuss their concerns with the DSL.
- Incident/Welfare concern forms are kept by the photocopier and in the Safeguarding folder in SharePoint.
- Safeguarding records are kept for individual learners and are maintained separately from all other records relating to the learner in the College. Safeguarding records are kept in accordance with data protection legislation and are only shared with staff on a 'need to know' basis.
- All safeguarding records will be transferred in accordance with data protection legislation to the learner's subsequent College/setting, under a confidential and separate cover. These will be given to the new DSL and a receipt of delivery will be obtained.

Multi-agency Working

The Oaks recognises and is committed to its responsibility to work with other professionals and agencies in line with statutory guidance (WTTSC 2018).

Colleges are not the investigating agency when there are safeguarding concerns. We will however contribute to the investigation and assessment processes as required. The Oaks recognises the importance of multi-agency working and will support attendance at relevant safeguarding meetings, including Vulnerable Young People Protection Conferences, Core Groups, Strategy Meetings, Vulnerable Young People in Need meetings, CHANNEL Panels or other early help multi-agency meetings.

The DSL and the wider College Leadership Team will work to establish strong and co-operative relationships with relevant professionals in other agencies.

In the event of the Police being called to the College, the officer must remain in reception and the learner will be retrieved from their classroom and brought to a private room. Under no circumstances must a police officer obtain a learner from anywhere within the college. A member of staff will remain with the learner and police officer until the officer has left the college site.

Confidentiality and Information Sharing

- The Oaks recognises our duty and powers to hold, use and share relevant information with appropriate agencies in matters relating to child protection at the earliest opportunity as per statutory guidance outlined within KCSIE 2023.
- The Oaks has a dedicated Data Protection Officer to ensure that our college is complaint with all matters relating to confidentiality and information sharing requirements. This in accordance with our duties as per the General Data Protection Regulations (GDPR). Contact details are as follows:

Peter Questier

Data Protection Officer

Information Governance, Children's Services

East Sussex County Council

schools.dpo@eastsussex.gov.uk

01273 337610

- The Data Protection Act 2018 and UK GDPR do not prevent the sharing of information for the purposes of keeping learners safe. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of learners. DfE "[Information sharing advice for safeguarding practitioners](#)" (2018) provides further detail.
- The DSL will only disclose information about a learner to other members of staff on a 'need to know' basis.
- All members of staff must be aware that whilst they have a duty to keep any information confidential, they also have a professional responsibility to share information with other agencies to safeguard vulnerable young people.
- All staff must be aware that they cannot promise a learner to keep secrets which might compromise the learner's safety or wellbeing.

DfE Guidance on Information Sharing (July 2018) provides further detail. This can be found in the Safeguarding folder on SharePoint.

Complaints

The College has a Complaints Procedure available to parents, learners and members of staff and visitors who wish to report concerns. This can be found on our website <https://www.theoaks.ac.uk/statements-and-policies>

All reported concerns will be taken seriously and considered within the relevant and appropriate process.

The Oaks has a Whistleblowing Policy that can be used if a member of staff is not satisfied with the outcome of their complaint.

Staff Induction, Awareness and Training

All members of staff have been provided with a copy of Part One of "*Keeping Children Safe in Education*" (2023) which covers safeguarding information for all staff. College leaders will read the entire document. Members of staff have signed to confirm that they have read and understood Part One.

- The DSL will ensure that all new staff (including temporary staff) are aware of the College's internal safeguarding processes.
- All staff members will receive training to ensure they are aware of a range of safeguarding issues.
- All staff members will receive regular safeguarding updates, at least annually.
- All staff members will be made aware of the College's expectations regarding safe and professional practice via the Staff Code of Conduct and Acceptable Use Policy.
- The DSL will monitor safeguarding training undertaken by all staff and will maintain an up-to-date register of who has been trained.
- Although the College has a nominated lead for the Board of Trustees, all members of the Board will access appropriate safeguarding training which covers their specific strategic responsibilities on a regular basis.

Safe Working Practice

- All members of staff are required to work within clear guidelines on the College's Staff Code of Conduct.
- Staff should be particularly aware of the professional risks associated with the use of social media and electronic communication (email, mobile phones, texting, social network sites etc.) and should adhere to the College's online safety and Acceptable Use policies.

Staff Supervision and Support

- Any member of staff affected by issues arising from concerns for a learner's welfare or safety can seek support from the DSL.
- The induction process will include familiarisation with vulnerable young people protection responsibilities and procedures to be followed if members of staff have any concerns about a learner's safety or welfare.
- The College will provide appropriate supervision and support for all members of staff to ensure that:
 - All staff are competent to carry out their responsibilities for safeguarding and promoting the welfare of all learners.
 - All staff will be supported by the DSL in their safeguarding role.
 - All members of staff will have regular reviews of their own practice to ensure they continually **improve**.
- The DSL will also put staff in touch with outside agencies for professional support if they wish. Staff can also approach organisations such as their Union or Benenden Health Care.

Safer Recruitment

- In accordance to our Safe Recruitment Policy The Oaks is committed to ensure that we develop a safe culture and that all steps are taken to recruit staff and volunteers who are safe to work with our pupils and staff.
- The Board of Trustees and Leadership Team are responsible for ensuring that the College follows safer recruitment processes.
- The Oaks is responsible for ensuring that the College maintains an accurate Single Central Record (SCR) in line with statutory guidance.
- The Board of Trustees will ensure that there is at least one member of the interview panel who has completed Safer Recruitment training.

- Applications for job roles will only be processed when a College application has been submitted. Curriculum vitae (CVs) will only be accepted alongside the full completed application form.
- Online searches of shortlisted applicants will take place during the recruitment process which may help identify any incidents or issues that have happened and are publicly available online. Staff at The Oaks may need to explore such incidents with the applicant at the interview.
- Enhanced DBS checks will be carried out on all staff and volunteers who undertake regulated activity with learners at The Oaks.
- We are also committed to supporting the statutory guidance from the Department for Education on the application of the Vulnerable young people (Disqualification) Regulations 2009 and related obligations under the Vulnerable young people care Act 2006 in Schools/Colleges.
- We advise all staff to disclose any reason that may affect their suitability to work with vulnerable young people including convictions, cautions, court orders, cautions, reprimands and warnings.
- The Oaks will maintain records of all staff who have attended Safer Recruitment training.
- Should The Oaks organise work experience placements, we will follow the advice and guidance as identified in part three of KCSIE 2023.

Allegations Against Members of Staff and Volunteers

The Oaks recognises that it is possible for staff to behave in a way that might cause harm to vulnerable young people and takes seriously any allegation received. Such allegations should be referred immediately to the Principal who will first contact the Local Authority Designated Officer (LADO) to agree further action to be taken in respect of the learner and staff member. In the event of allegations of abuse being made against the Principal then staff are advised that allegations should be reported to the Chief Executive Officer who will contact the LADO in the first instance.

- All staff and volunteers should feel able to raise concerns about poor or unsafe practice and such concerns will always be taken seriously by the Leadership Team.
- All members of staff are made aware of the College's Whistleblowing procedure and that it is a disciplinary offence not to report concerns about the conduct of a colleague that could place a learner at risk.
- The Oaks has a legal duty to refer to the Disclosure and Barring Service (DBS) anyone who has harmed, or poses a risk of harm, to a learner, or if there is reason to believe the member of staff has committed one of a number of listed offences, and who has been removed from working (paid or unpaid) in regulated activity or would have been removed had they not left. The DBS will consider whether to bar the person. If these circumstances arise in relation to a member of staff at our College, a referral will be made as soon as possible after the resignation or removal of the individual in accordance with advice from the LADO.

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Learners undertaking Work Related Opportunities.

Expectations:

Learners are given the opportunity to participate in work related learning placements off College site. The College will inform partner businesses and/or employers of learners who may be particularly vulnerable when away from their College routine.

College staff will ascertain the suitability of all work experience placements and will risk assess accordingly.

College staff will liaise with employers in regard to their own safeguarding practices and ensure they are confident that safeguarding is considered a priority.

Organisation:

The Oaks and each employer will be familiar with each other's safeguarding practices and policies and procedures and whom to contact should a concern arise.

Ros Leach College Principal is the Lead DSL – ros.leach@theoaks.ac.uk

Lynsey Ritchie is the Deputy DSL - lynsey.ritchie@theoaks.ac.uk.

College Support:

College Staff will provide safeguards such as:

- undertaking initial checks prior to any placement being confirmed
- helping learners to prepare for their placement
- safeguarding and general wellbeing checks during the placement. This will involve working closely with employers to ensure that the correct employment checks, health and safety considerations and any other safeguards, such as risk assessments are in place.
- Ensure that the College and the work experience placement clearly identify responsibilities for ensuring these checks are in place.
- making sure that any concerns or disclosures are acted upon quickly taking into considerations both parties' safeguarding procedures.

Online Safety

The Oaks' Digital Curriculum plays a significant role in developing learners' independence beyond College. It is recognised that the use of technology presents challenges and risks to learners and young people both inside and outside of College. Therefore, it is the responsibility of all staff to ensure we continue to develop learners' digital skills whilst being mindful of potential risks.

- The DSL has overall responsibility for online safeguarding within the College.
- The Oaks identifies that the issues can be broadly categorised into four areas of risk:
- **content:** being exposed to illegal, inappropriate or harmful material
- **commerce:** Online behaviour that increases the likelihood of, or causes, financial harm
- **contact:** being subjected to harmful online interaction with other users
- **conduct:** personal online behaviour that increases the likelihood of, or causes, harm.
- **commerce:** risks such as online gambling, financial scams, inappropriate advertising and or financial scams.

The DSL and leadership team have read annex C regarding Online Safety within 'Keeping Vulnerable Young People Safe in Education' 2023.

- The Oaks recognises the specific risks that can be posed by mobile phones and cameras and in accordance with KCSIE 2023, it has appropriate policies in place that are shared and understood by all members of the College community. Further information relating to this can be found in the College's Online Safety Policy and Acceptable Use Policy which can be found on our website and on the college shared drive respectively.
- The Oaks will ensure that appropriate filtering and monitoring systems are in place when pupils and staff access College systems and internet provision.
- The Oaks acknowledges that whilst filtering and monitoring is an important part of the College's online safety responsibilities, it is only one part of our approach to online safety. Learners may have access to systems external to the College control such as mobile phones and other internet enabled devices and technology, and where concerns are identified appropriate action will be taken.

The Oaks will ensure a comprehensive whole College curriculum response is in place to enable all pupils to learn about and manage online risks effectively and will support parents and the wider College community (including all members of staff) to become aware and alert to the need to keep learners safe online.

Curriculum and Staying Safe

- We recognise that Colleges play an essential role in helping learners to understand and identify the parameters of what is appropriate vulnerable young people and young people behaviour; what is 'safe'; to recognise when they and others close to them are not safe; and how to seek advice and support when they are concerned.

- Our embedded PSHE curriculum provides opportunities for increasing self-awareness, self-esteem, social and emotional understanding, assertiveness and decision making so that students have a range of contacts and strategies to ensure their own protection and that of others.
- Online safety is integrated into the curriculum as part of The Oaks Digital Skills and Accessibility curriculum.
- Our PSHE Curriculum will reflect the greater emphasis of risks for LGBTQ+ learners and/or those that are perceived to be.
- The Oaks recognises that a one size fits all approach may not be appropriate for all learners, and a more personalised or contextualised approach for more vulnerable learners, victims of abuse and some SEND children might be needed.
- Our College systems support learners to talk to a range of staff. Learners will be listened to, and their concerns will be taken seriously and acted upon as appropriate.

Security

- All members of staff have a responsibility for maintaining awareness of buildings and grounds security and for reporting concerns that may come to light.
- Appropriate checks will be undertaken in respect of visitors and volunteers coming into College as outlined within guidance. Visitors will be expected to sign in and out via the office visitors log and to display a visitors badge whilst on College site. Any individual who is not known or identifiable should be challenged for clarification and reassurance.
- The College will not accept the behaviour of any individual (parent or other) that threatens College security or leads learners and staff to feel unsafe. Such behaviour will be treated as a serious concern and may result in a decision to refuse access for that individual to the College site.

Monitoring and Review

- All College staff (including temporary staff and volunteers) will have access to a copy of this policy. The policy will also be available to parents/carers via The Oaks' website.
- The policy forms part of our College development plan and will be reviewed annually.

Local Support

All members of staff in The Oaks are made aware of local support available: Please see below

Contact details for Area Safeguarding Advisor (Education Safeguarding Service)

<https://www.kelsi.org.uk/child-protection-and-safeguarding/safeguarding-contacts>

Telephone: 03000 412284

Mobile: 07540677200

Contact details for Online Safety in the Education Safeguarding Service

Rebecca Avery, Education Safeguarding Advisor (online protection)

Ashley Assiter, Online Safety Development Officer – 03000 415797

esafetyofficer@kent.gov.uk (non-urgent issues only)

Contact details for LADO

Telephone: 03000 410888

Out of Hours: 03000 411111

Email: kentchildrenslado@kent.gov.uk

Vulnerable young people Social Work Services

Front door: 03000 411111

Out of Hours: 03000 419191

Kent Police
101 (999 if there is an immediate risk of harm)

Kent Safeguarding Vulnerable young people Multi-agency Partnership (KSCMP)
kscmp@kent.gov.uk
Telephone: 03000 421126

Kent and Medway Safeguarding Adults Board
KMSAB@kent.gov.uk

National Support

Support for staff

- Education Support Partnership: www.educationsupportpartnership.org.uk
- Professional Online Safety Helpline: www.saferinternet.org.uk/helpline

Support for Pupils

- NSPCC: www.nspcc.org.uk
- Vulnerable young people Line: [www.vulnerable young peopleline.org.uk](http://www.vulnerableyoungpeopleline.org.uk)
- Papyrus: www.papyrus-uk.org
- Young Minds: www.youngminds.org.uk
- The Mix: www.themix.org.uk

Support for young people

- Family Lives: www.familylives.org.uk
- Crime Stoppers: www.crimestoppers-uk.org
- Victim Support: www.victimsupport.org.uk
- Kidscape: www.kidscape.org.uk
- The Samaritans: www.samaritans.org
- Mind: www.mind.org.uk
- NAPAC (National Association for People Abused in Vulnerable young peoplehood): napac.org.uk
- MOSAC: www.mosac.org.uk
- Action Fraud: www.actionfraud.police.uk

Support for Learning Disabilities

- Respond: www.respond.org.uk
- Mencap: www.mencap.org.uk

Domestic Abuse

- Refuge: www.refuge.org.uk
- Women's Aid: www.womensaid.org.uk
- Men's Advice Line: www.mensadviceline.org.uk
- Mankind: www.mankind.org.uk
- Domestic abuse services: www.domesticabuseservices.org.uk

Honour based Violence

- Forced Marriage Unit: www.gov.uk/guidance/forced-marriage

Sexual Abuse and CSE

- Lucy Faithfull Foundation: www.lucyfaithfull.org.uk
- Stop it Now!: www.stopitnow.org.uk
- Parents Protect: www.parentsprotect.co.uk
- CEOP: www.ceop.police.uk
- Marie Collins Foundation: www.mariecollinsfoundation.org.uk
- Internet Watch Foundation (IWF): www.iwf.org.uk

Online Safety

- Vulnerable young people International: www.vulnerableyoungpeoplenet.com
- UK Safer Internet Centre: www.saferinternet.org.uk
- Parents Info: www.parentinfo.org
- Internet Matters: www.internetmatters.org
- Net Aware: www.net-aware.org.uk
- Get safe Online: www.getsafeonline.org

Radicalisation and hate

- Educate against Hate: www.educateagainsthate.com
- Counter Terrorism Internet Referral Unit: www.gov.uk/report-terrorism
- True Vision: www.report-it.org.uk

Annex

Specific Safeguarding Issues

- The Oaks is aware of a range of specific safeguarding issues and situations that can put learners at greater risk of harm. In addition to Part One, DSLs, College leaders and staff who work directly with learners will read annex B of KCSIE 2023 which contains important additional information about specific forms of abuse and safeguarding issues.
- Where staff are unsure how to respond to specific safeguarding issues, they should follow the processes as identified in part 3 of this policy and speak with the DSL or a deputy.

Peer-on-peer Abuse and Sexual Harassment.

- All members of staff at College recognise that learners are capable of abusing their peers, and that it can happen both inside and outside of College and online.
- The Oaks recognises sexual violence and sexual harassment can occur between two learners of any age and sex. It can occur through a group of learners sexually assaulting or sexually harassing a single learner or group of learners and can occur online and face to face (both physically and verbally). Sexual violence and sexual harassment is never acceptable.
- When there has been a report of sexual violence or harassment, the DSL will make an immediate risk and needs assessment which will be considered on a case-by-case basis which explores how best to support and protect the victim and the alleged perpetrator (and any other learners involved/impacted).
- The risk and needs assessment will be recorded and kept under review and will consider the victim (especially their protection and support), the alleged perpetrator, and all other adult students and staff and any actions that are required to protect them.
- Reports will initially be managed internally by the College and where necessary will be referred to Social Services and/or the Police.
- The decision making and required action taken will vary on a case by case basis, but will be informed by the wishes of the victim, the nature of the alleged incident (including whether a crime may have been committed), the ages and developmental stages of the learners involved, any power imbalance, if the alleged incident is a one-off or a sustained pattern of abuse, if there are any ongoing risks to the victim, other learners, adult students or College staff, and, any other related issues or wider context.
- If at any stage the DSL is unsure how to proceed, advice will be sought from the Education Safeguarding Service.
- Alleged victims, perpetrators and any other child affected by peer-on-peer abuse will be supported by:
 - taking reports seriously
 - listening carefully
 - avoiding victim blaming
 - providing appropriate pastoral support
 - working with parents/carers

- reviewing educational approaches
 - following procedures as identified in other policies e.g. the school/college anti-bullying, behaviour and child protection policy, and where necessary and appropriate, informing the police and/or ICS.
- College staff recognise that peer-on-peer abuse can take many forms, including but not limited to:
 - Bullying, including cyberbullying, prejudice-based and discriminatory bullying
 - abuse in intimate personal relationships between peers
 - physical abuse which can include hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm
 - sexual violence and sexual harassment
 - consensual and non-consensual sharing of nudes and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery)
 - 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
 - upskirting (which is a criminal offence), 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
 - initiation/hazing type violence and rituals
- The Oaks believes that abuse is abuse and it will never be tolerated or dismissed as "banter", "just having a laugh", "part of growing up" or "boys being boys" as this can lead to a culture of unacceptable behaviours and an unsafe environment for learners.
- The Oaks recognise that even if there are no reported cases of peer-on-peer abuse, such abuse is still likely to be taking place.
- All staff have a role to play in challenging inappropriate behaviours between peers. Staff recognise that some peer-on-peer abuse issues may be affected by gender, age, ability and culture of those involved, i.e. for gender based abuse, girls are more likely to be victims and boys more likely to be perpetrators.
- Concerns about learner's behaviour, including peer-on-peer abuse taking place offsite will be responded to as part of a partnership approach with learners and parents/carers. Offsite behaviour concerns will be recorded and responded to in line with existing appropriate policies, for example anti-bullying, acceptable use, behaviour and child protection policies.
- In order to minimise the risk of peer-on-peer abuse, The Oaks will:
 - implement a robust anti-bullying policy
 - provide an appropriate PSHE and RSE curriculum
 - provide an open and honest environment where learners do not hesitate to raise any concerns with a trusted member of staff.
- The Oaks want learners to feel able to confidently report abuse and know their concerns will be treated seriously. All allegations of peer-on-peer abuse will be reported to the DSL and will be recorded, investigated, and dealt with in line with associated college policies, including child protection, anti-bullying and behaviour. Learners who experience abuse will be offered appropriate support, regardless of where the abuse takes place.

Sexual Violence or Harassment (e

- When there has been a report of sexual violence or harassment, the DSL will make an immediate risk and needs assessment which will be considered on a case-by-case basis which explores how best to support and protect the victim and the alleged perpetrator (and any other learners involved/impacted).
 - The risk and needs assessment will be recorded and kept under review and will consider the victim (especially their protection and support), the alleged perpetrator, and all other adult students and staff and any actions that are required to protect them.
- Reports will initially be managed internally by the College and where necessary will be referred to Social Services and/or the Police.
 - The decision making and required action taken will vary on a case by case basis, but will be informed by the wishes of the victim, the nature of the alleged incident (including whether a crime may have been committed), the ages and developmental stages of the learners involved, any power imbalance, if the alleged incident is a one-off or a sustained pattern of abuse, if there are any ongoing risks to the victim, other learners, adult students or College staff, and, any other related issues or wider context.
- If at any stage the DSL is unsure how to proceed, advice will be sought from the Education Safeguarding Service.

Nude and/or Semi-Nude Image Sharing

The term ‘sharing nudes and semi-nudes’ is used to mean the sending or posting of nude or semi-nude images, videos or live streams of/by young people under the age of 18. Although learners at The Oaks are over 18 they remain vulnerable and so the sharing of nudes/semi nudes will be taken very seriously and appropriate action will be taken, including contacting the police if necessary.

- The Oaks recognises that consensual and non-consensual sharing of nudes and semi-nude images and/or videos (also known as youth produced/involved sexual imagery or “sexting”) can be a safeguarding issue; all concerns will be reported to and dealt with by the DSL (or deputy).
- When made aware of concerns involving consensual and non-consensual sharing of nudes and semi-nude images and/or videos by learners, staff are advised to:
 - Report any concerns to the DSL immediately.
 - Never view, copy, print, share, store or save the imagery, or ask a child to share or download it – this may be illegal. If staff have already viewed the imagery by accident, this will be immediately reported to the DSL.
 - Not delete the imagery or ask the child to delete it.
 - Not say or do anything to blame or shame any learner involved.
 - Explain to the learners involved that they will report the issue to the DSL and reassure them that they will receive appropriate support and help.
 - Not ask the learner/s involved in the incident to disclose information regarding the imagery and not share information about the incident with other members of staff, the learner/s involved or their, or other, parents and/or carers. This is the responsibility of the DSL.
 - the DSL will hold an initial review meeting to explore the context and ensure appropriate and proportionate safeguarding action is taken in the best interests of the learner involved. This may mean speaking with relevant staff and the learners involved as appropriate.

- parents and carers will be informed at an early stage and be involved in the process to best support learners, unless there is good reason to believe that involving them would put a learner at risk of harm.
- All decisions and action taken will be recorded in line with our safeguarding procedures.
- a referral will be made to ICS and/or the police immediately if:
 - the incident involves an adult (over 18).
 - there is reason to believe that a learner has been coerced, blackmailed, or groomed.
 - the image/videos involve sexual acts and a child under the age of 13, depict sexual acts which are unusual for the child's developmental stage, or are violent.
 - a learner or another young person is at immediate risk of harm owing to the sharing of nudes and semi-nudes.
- The DSL may choose to involve other agencies at any time if further information/concerns are disclosed at a later date.
- If DSLs are unsure how to proceed, advice will be sought from Social Services.

Gangs and County Lines.

The Oaks recognises the impact of gangs, county lines, violent crime and exploitation. It is recognised that the initial response to vulnerable young victims is important and that staff will take any allegation seriously and work in ways that support vulnerable young people and keep them safe.

- All staff have been trained and recognise the need to be vigilant for the signs that may include, but not exclusively:
 - Unexplained gifts/new possessions – these can indicate learners have been approached by/involved with individuals associated with criminal networks/gangs.
 - Increased absence from College.
 - Change in friendships/relationships with others/groups.
 - Significant decline in performance.
 - Signs of self-harm/significant change in wellbeing.
 - Signs of assault/unexplained injuries.

Exploitation

- The Oaks recognise that exploitation occurs when an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a young person into taking part in sexual or criminal activity, in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. Males and females can be exposed to exploitation and can include young people who have been moved (commonly referred to as trafficking) for the purpose of exploitation.
- Young people who are being exploited do not realise they are being exploited and may believe they are in a genuine romantic relationship.
- If staff are concerned that a learner may be at risk of exploitation, immediate action should be taken by speaking to the DSL or a deputy.

Serious Violence

- All staff are made aware of the indicators which may signal a learner is at risk from or is involved with serious violent crime. These may include unexplained gifts or new possessions, increased absence from college, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries.

- Any concerns regarding serious violence will be reported and responded to in line with other safeguarding concerns.
 - The initial response to victims is important and staff will take any allegations seriously and work in ways that support learners and keep them safe.

So-called honour based abuse

- So-called ‘honour’-based abuse (HBA) encompasses incidents or 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 HBA are abuse (regardless of the motivation) and concerns should be responded to in line with Section 6 of this Policy. Staff will report any concerns about HBA to the DSL or a deputy.

Radicalisation

- The Oaks is aware of our duty under section 26 of the Counter-Terrorism and Security Act 2015 (the CTSA 2015), to have “due regard to the need to prevent people from being drawn into terrorism”, also known as the Prevent duty and the specific obligations placed upon us as an education provider regarding risk assessments, working in partnership, staff training, and IT policies.
- We recognise that young adults with special educational needs are vulnerable to extremist ideology and radicalisation and staff will be alert to changes in learners’ behaviour which could indicate that they may be in need of help or protection.
- Staff will report any concerns to the DSL (or a deputy), who is aware of the [local procedures](#) to follow.

Cybercrime

- The Oaks recognises that learners with particular skills and interests in computing and technology may inadvertently or deliberately stray into ‘cyber-enabled’ (crimes that can happen offline but are enabled at scale and at speed online) or ‘cyber dependent’ (crimes that can be committed only by using a computer/internet enabled device) cybercrime.
- If staff are concerned that a learner may be at risk of becoming involved in cyber-dependent cybercrime, the DSL will be informed, and consideration will be given to accessing local support and/or referring into the [Cyber Choices](#) programme, which aims to intervene when young people are at risk of committing, or being drawn into, low level cyber-dependent offences and divert them to a more positive use of their skills and interests.
- Where there are concerns about ‘cyber-enabled’ crime such as fraud, purchasing of illegal drugs online, sexual abuse and exploitation, or other areas of concern such as online bullying or general online safety, they will be responded to in line with this and other appropriate policies.

Absence

- Although absence in itself is not generally a safeguarding concern, The Oaks recognises that persistent absence, as well as missing from College, could be a sign of a range of safeguarding concerns such as sexual abuse, sexual exploitation and/or criminal exploitation.

- All absences are followed up with learners and/or their families if The Oaks is not aware of the reason for the absence.