

West Midlands UTC

Safeguarding Children Policy

Safeguarding and promoting the welfare of children is defined for the purpose of this policy as: protecting children from maltreatment; preventing impairment of children's health or development; ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and taking action to enable all children to have the best outcomes.

This policy is designed to enable the West Midlands UTC (WMUTC) to ensure the safeguarding of children and young people in compliance with the guidance document 'Keeping Children Safe in Education' (September 2018), 'Working Together to Safeguard Children' (July 2018), 'Information Sharing' (July 2018) and 'What To Do If You Are Worried A Child Is Being Abused' (March 2015). In addition WMUTC regularly refers to and complies with information published on the City of Wolverhampton Council website and other relevant Local Authority websites. This policy is available on the school website, on request to parents and carers, the LAs and Ofsted through the Principal.

Through their day-to-day contact with learners and direct work with families, staff at the WMUTC have a crucial role to play in noticing indicators of possible abuse or neglect and referring them to the appropriate agency, normally the appropriate Children's Team (Social Care) for the Local Authority that the learner resides in. Staff at WMUTC will work within the procedures and threshold model of Wolverhampton Safeguarding Children Board. (WSCB).

We recognise our moral and statutory responsibility to safeguard and promote the welfare of all children. We understand that safeguarding and promoting the welfare of children is everyone's responsibility and everyone who comes into contact with our children and families has a role to play in identifying concerns, sharing information and taking prompt action.

Author	SM	Version	3
Date Approved	22/09/2016	Last Review Date	24.09.18
Comments	This Policy sets out how the WMUTC's Governing Body discharges its statutory responsibilities relating to safeguarding and promoting the welfare of children who are learners at the UTC.		
Monitoring, Evaluation and Review	The Governing Body will review this document at least every year and assess its implementation and effectiveness in consultation with key stakeholders to ensure that it remains compliant and up to date with changing regulation. This policy will be reviewed in August 2019 or earlier if required. A member of the Leadership team will be retain responsibility for the welfare of students. This member of staff (Vice Principal) will ensure the implementation of this policy. They will monitor and evaluate the impact of the policy and conduct regular consultation with parents, students and staff to ensure that the policy is fit for purpose and being applied consistently. The Principal will review the policy and its impact annually and offer feedback to the Governing body.		

	All staff must read and consider this policy and familiarise themselves with their responsibilities. The UTC requires that all staff sign a declaration that they have read this policy before they start working with children or young people at the UTC.
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1. Introduction

WMUTC fully recognises the contribution it can make to protect and support young people in its care. The learners' welfare is of paramount importance. This policy is consistent with:

- the legal duty to safeguard and promote the welfare of children, as described in the Education Act 2006; the DfES guidance - Information Sharing (July 2018); What To Do If You Are Worried A Child Is Being Abused, (March 2015); Working Together to Safeguard Children (July 2018) and Keeping Children Safe in Education – Statutory Guidance for Schools and Colleges (September 2018); Sections 26 & 29 of the Counter-Terrorism and Security Act 2015; Section 5B of the Female Genital Mutilation Act 2003; Children Act 2006
- WSCB Safeguarding Children Board Procedures, which contain the inter-agency processes, protocols and expectations for safeguarding children.

This document provides the basis for good practice within the UTC for child protection work. It should be read in conjunction with Wolverhampton and other relevant Safeguarding Children Board Inter-Agency Child Protection Policies and Procedures. This document is also in keeping with relevant national procedures and reflect what the UTC considers to be safe and professional practice in this context. Child protection has to be considered within professionals' wider 'safeguarding' responsibilities that include a duty to co-operate under the Children Act 2006.

The procedures in this policy aim to provide a framework which ensures that all practice in the area of child protection is consistent with stated values and processes that underpin all work with children and young people.

This document also seeks to make the professional responsibilities clear to all staff to ensure that statutory and other duties are met in accordance with the relevant Safeguarding Children Board requirements and procedures. (Wolverhampton SCB requirements are used in the first instance).

WMUTC will therefore:

- establish and maintain an ethos where young people feel secure and are encouraged to talk, and are listened to;
- ensure that young people know that there are adults in the UTC whom they can approach if they are worried or are in difficulty;
- include in the curriculum, company and mentoring activities relating to PSHCE, opportunities which equip young people with the skills they need to stay safe from abuse, and which will help them to develop realistic attitudes to the responsibilities of adult life, particularly with regard to childcare and parenting skills;
- Learners up until the age of 18 years will be subject to the procedures and protocols of this policy. For learners over the age of 18, as good practice, the UTC will follow the non-

statutory elements of the policy to provide appropriate support. For vulnerable learners over the age of 18 such as stated learners, the protocols and procedures will be followed but will include a referral if necessary to the Adult Safe Guarding Board of the relevant Local Authority.

2. Purpose

WMUTC recognises that effective safeguarding and child protection work requires sound procedures, good inter-agency co-operation and a workforce that is competent and confident in responding to child protection situations.

2.1. This policy aims to:

- provide clear direction to staff, business partners and others about responsibilities and expected codes of behaviour in dealing with safeguarding and child protection issues;
- to make explicit the UTC's commitment to the development of good practice and sound procedures;
- ensure that child protection concerns and referrals are handled sensitively, professionally and in ways that support the needs of the child.

2.2. There are five main objectives to our policy and its appendices:

- Ensuring we practice safe recruitment in checking the suitability of staff, business partners and volunteers to work with children;
- Raising awareness of child protection issues and equipping children with the skills needed to keep them safe;
- Developing and then implementing procedures for identifying and reporting cases, or suspected cases of abuse;
- Supporting children who have been abused in accordance with his/her agreed child protection plan;
- Establishing a safe environment in which children can learn and develop.

3. Underpinning Values

Where there is a safeguarding issue, the UTC will work in accordance with the principles outlined in the Wolverhampton Safeguarding Children Board Inter-agency Child Protection procedures taking note if any differences arise in protocols or procedures of other Local Authority guidelines if the child resides outside of Wolverhampton.

3.1. WMUTC believes:

- learners are best protected when professionals are clear about their individual responsibilities and how they can work together with others;
- a child's welfare is paramount. Each child has a right to be protected from harm and exploitation and to have their welfare safeguarded;
- each child is unique. Action taken by child welfare organisations should be child-centred, taking account of a child's cultural, ethnic and religious background, their gender, their sexual orientation, their individual ability and any additional educational/ special needs;

- children, parents and other carers should be made aware of their responsibilities and their rights, together with advice about the power of professionals to intervene in their family circumstances;
- each child has a right to be consulted about actions taken by others on his/her behalf. The concerns of children and their families should be listened to and due consideration given to their understanding, wishes and feelings;
- individual family members must be involved in decisions affecting them. They must be treated with courtesy and respect and with due regard given to working with them in a spirit of partnership in safeguarding children's welfare;
- open-mindedness and honesty must guide each stage of assessment and of operational practice. The strengths of individual family members, as well as their needs, should be given due consideration;
- personal information is usually confidential. It should only be shared with the permission of the individual concerned, or unless the disclosure of confidential personal information is necessary in order to protect a child. In all circumstances, information must be confined to those people directly involved in the professional network of each individual child and on a strict "need to know" basis;
- professionals should be aware of the effects of outside intervention upon children, upon family life and the impact and implications of what they say and do;
- explanations by professionals to children, their families and other carers should be plainly stated and jargon-free. Unavoidable technical and professional terminology should be explained in simple terms;
- sound professional practice is based upon positive inter-agency collaboration, evidence-based research and effective supervision and evaluation;
- early intervention in providing support services in line with DfE Guidance on 'Keeping Children Safe In Schools' September 2018, is an important principle of practice in inter-agency arrangements for safeguarding the welfare of children.

4. Roles & Responsibilities

4.1. Governing Body Responsibilities

The Governing Body fully recognises its responsibilities with regard to child protection and to safeguarding and promoting the welfare of children.

In conjunction with the Principal, it will:

- Designate a Governor for Safeguarding (Kerrie Jones) who will oversee the UTC's Safeguarding Policy and practice and champion child protection issues;
- ensure an annual report is made to the Governing Body, on Safeguarding matters to include changes affecting Safeguarding Policy and procedures, Safeguarding training received, the number of incidents/cases (no names) and Safeguarding in the curriculum;
- ensure that this policy is annually reviewed, updated and made available on the UTC website.
- Ensure the Staff Code of Conduct and E-safety policies include staff/pupil relationships, acceptable use of technologies and communications including the use of social media.
- Ensure that the UTC respond appropriately to incidents of sexting and that the issue is included in the curriculum.

- Designate an appropriately trained member of staff from the leadership team as Designated Lead; currently Claire Gleeson, and ensure that in the absence of the DSL the UTC has more than one appropriately trained deputy. The designated safeguarding lead will take lead responsibility for safeguarding and child protection including online safety. Their responsibilities will be explicit in the role holder's job description.
- Designate an appropriately trained member of staff as Designated Teacher for LAC; currently Philippa Shaw; and ensure that in the absence of the DT the UTC has more than one appropriately trained teacher.
- Ensure that staff undertake relevant Safeguarding training at induction which is then regularly updated through a variety of means by the DSL.
- Ensure that appropriate filters and monitoring solutions are in place to protect students from potentially harmful and inappropriate online material.
- Ensure that the recruitment of new staff is compliant with WMUTCs 'Safer Recruitment' policy.
- Ensure that there are procedures in place to handle allegations against staff and volunteers (as described in the Safeguarding and Allegations of Abuse Policy) and that such allegations are referred to the designated officer of the local authority.
- Ensure that through the Professional Conduct and Respect Policy, the Anti Bullying and Harassment Policy, and this policy that the risk of peer on peer abuse is minimised and where reported, dealt with whilst supporting the victims. Peer on peer abuse can take many forms and manifest itself in different ways dependent upon gender, for example girls being touched/assaulted sexually or boys being subject to initiation type violence.
- Through the DSL, ensure that the child's wishes are taken into account when determining what action to take on a safeguarding matter. Actions taken should always be in the best interests of a child and they should have the opportunity to give feedback.
- Our Governors understand and recognise the importance of information sharing between practitioners and local agencies. Our Governors will ensure arrangements are in place that set out clearly the process and principles of information sharing within the school/college and with the three safeguarding partners, other organisations, agencies and practitioners as required
- Our Governors understand the Data Protection Act 2018 and the GDPR places duties on organisations and individuals to process personal information fairly and lawfully and to keep the information they hold safe and secure.
- Our Governors understand the DPA 2018 and the GDPR are not barriers to sharing information where the failure to do so would result in a child being placed at risk of harm they understand that fears about sharing information cannot be allowed to stand in the way of the need to promote the welfare and protect the safety of children.
- Our Governors will ensure relevant staff have due regard to the data protection principles, which allow them to share personal information, as provided for in the Data Protection Act 2018, and the GDPR. Relevant staff should be confident of the processing conditions under the Data Protection Act 2018 and the GDPR which allow them to store and share information for safeguarding purposes, including information which is sensitive and personal, and should be treated as 'special category personal data'.
- Our Governors will ensure that staff who need to share 'special category personal data' are aware that the Data Protection Act 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information. This includes allowing practitioners to share information without consent, if it is not possible to gain consent, it cannot be reasonably expected that a practitioner gains consent, or if to gain consent would place a child at risk.

4.2. WMUTC Procedural Responsibilities

WMUTC safeguarding policy will describe procedures which are in accordance with government guidance and refer to locally agreed multi-agency-agency safeguarding arrangements put in place by the three safeguarding partners (the local authority; a clinical commissioning group for an area with the local authority and the chief officer of police for a police area in the local authority area). It will be updated annually (as a minimum), and be available publicly either via our school/college website or by other means.

In addition, staff and leaders in our UTC must 'have regard' to the guidance issued in Keeping Children Safe in Education: information for all school and college staff (September 2018)

4.3. The WMUTC Designated Safeguarding Lead (DSL)

The UTC will:

- ensure it has a Designated Safeguarding Lead, Claire Gleeson, Leader of Student Welfare and Safeguarding, and Deputy Safeguarding Lead (Simon Maxfield) who have undertaken as a minimum, the two-day child protection training course, accredited by an appropriate Local Safeguarding Children Board;
- ensure this training is updated as a minimum every two years in accordance with Government guidance;
- recognise the importance of the role of the Designated Safeguarding Lead and ensure they have the time and training to undertake their duties;
- ensure there are contingency arrangements should the Designated Safeguarding Lead not be available;
- ensure that the Designated Safeguarding Lead will take advice from a child protection specialist when managing complex cases (e.g. relevant Local Authority Education Safeguarding Children Manager);
- ensure that the Designated Safeguarding Lead is responsible for coordinating action where it is suspected that a child is in need, has been harmed, or is at risk of significant harm; ensure they are familiar with Local Safeguarding Children Board procedures and DfE guidance;
- ensure child protection records are maintained.

The Designated Lead for Safeguarding will:

- Refer cases of suspected abuse to the Local Safeguarding Children Board and support staff who make referrals to the Local Safeguarding Children Board
- Act as a point of contact with the three safeguarding partners;
- Refer cases to the Channel programme where there is a PREVENT concern and support staff who make referrals as required
- Refer cases where a person is dismissed or left due to risk/harm to a child to the DBS (Disclosure and Barring Service) as required
- Refer cases of possible crime to the Police
- Liaise with the Principal to inform him/her of Safeguarding issues, ongoing Section 47 enquiries and police investigations
- Undertake training at least every two years to enable the fulfilment of their duties and keep updated regularly of developments
- Undertake PREVENT awareness training and be able to provide support and guidance to

- staff on protecting children from the risks of radicalisation
- Understand and utilise local procedures for the early help and intervention of children (EHA)
 - Have a working knowledge of how child protection case conferences are conducted and be able to attend and contribute to these when required to do so
 - Ensure all staff have access to and understand the UTC Safeguarding Policy and procedures, including induction of new staff and maintaining communication with part time staff
 - Keep detailed, accurate and secure written records of concerns and referrals
 - Work with governors, the Principal and others to ensure that the Safeguarding Policy and procedures are updated and utilised effectively when needed
 - Ensure that the Safeguarding Policy is available via the UTC's website and updated as needed
 - Link with the safeguarding partner arrangements to make sure staff are aware of training opportunities and the latest local policies on local safeguarding arrangements.
 - Where children leave the school or college, ensure their child protection file is transferred to the new school as soon as possible and separately from the main pupil file, with a record of receipt obtained.
 - Be available or ensure a deputy is available during term time for staff to discuss any concerns.
 - Make arrangements for cover that allow out of hours contact to be made with either the DSL or a deputy.
 - Understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the General Data Protection Regulation.
 - Understand the importance of information sharing, both within the school and college, and with the three safeguarding partners, other agencies, organisations and practitioners.
 - Coordinate training and regular Safeguarding updates for all staff (at least annually) to ensure they are competent to fulfil their duties. Enrol and maintain records of completed online training available through LSCB.
 - Have responsibility as the designated teacher for LAC and ensure that the UTC follow the 'WMUTC LAC and Vulnerable Students Policy'.
 - Liaise with staff (especially pastoral support staff, school nurses, IT Technicians, and SENCOs or the named person with oversight for SEN in a college) on matters of safety and safeguarding (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies.
 - Liaise closely with the SENDCO to ensure that the additional safeguarding challenges faced by SEND students are recognised by all staff through raising awareness sessions; including assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration; children with SEND can be disproportionately impacted by things like bullying without outwardly showing any signs; and communication barriers and difficulties in overcoming these barriers.

The designated safeguarding lead may delegate safeguarding activities to the deputy safeguarding lead however the designated safeguarding lead will retain the lead responsibility for child protection and safeguarding. This responsibility will not be delegated.

4.4. The Role of UTC Staff

The Teacher Standards (2012) state that teachers, including headteachers/principals, should safeguard children's wellbeing and maintain public trust in the teaching profession as part of

their professional duties. We extend this level of duty to include all the staff and volunteers who work at WMUTC.

All staff are given part one of Keeping Children Safe in Education together with Annexe A. All staff receive annual safeguarding training and regular safeguarding updates throughout the course of the year. Staff confirm that they have received, read and understood our school's safeguarding policies and procedures and that they have attended safeguarding training.

The UTC will ensure that:

- All staff have a responsibility to provide a safe environment in which children can learn;
- All staff have a responsibility to identify children who may benefit from early help or who are suffering, or are likely to suffer, significant harm.
- Any staff member who has a concern about a child must follow the referral process
- All staff have a responsibility to take appropriate action, our staff will be expected to support social care and other agencies following referrals;
- Where reasonably possible, our school will hold more than one emergency contact number for each pupil or student.
- In addition to working with the designated safeguarding lead or deputy designated safeguarding lead staff members should be aware that they may be asked to support social workers and other agencies to take decisions about individual children;
- During induction, all staff members will be made aware of the systems within the UTC which support safeguarding and these will be explained to them as part of their induction. This includes: the safeguarding and child protection policy; the staff behaviour policy/code of conduct; the school behaviour policy, Keeping Children Safe in Education - part 1, Annex A, Annex B- the role of the designated safeguarding lead and the names of the designated safeguarding lead and deputies. Our induction and training will be in line with advice from the three safeguarding partners.
- All staff members will receive appropriate safeguarding/child protection updates regularly, but at least annually;
- All staff will be made aware of the local early help process and understand their role in it.
- All staff will be made aware of the process for making referrals to children's social care and for statutory assessments, especially children in need (section 17) and a child suffering, or likely to suffer, significant harm (Section 47) that may follow a referral along with the role that they may be expected to play in such assessments
- All staff will be made aware of what to do if a child discloses that he/she is being abused or neglected
- All staff members will be made aware of the types and signs of abuse and neglect so that they can identify cases of children who may need help or protection;
- Staff members working with children are advised to maintain an attitude of 'it could happen here' where safeguarding is concerned. When concerned about the welfare of a child, staff members should always act in the best interests of the child and always speak to the designated safeguarding lead or deputy immediately
- All staff should be aware of the seven golden rules for sharing information, if in any doubt about sharing information, staff should speak to the designated safeguarding lead or a deputy. Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety, of children.
- Staff should ensure that if a child has made a disclosure, they are aware that the information will only be shared with the designated safeguarding lead and children's

social care. Staff should never promise a child that they will not tell anyone about a report of abuse.

- Staff will be alert to the potential need for any child who: is disabled and has specific needs; has special educational needs; is a young carer; is showing signs of being drawn into anti-social behaviour including gangs and organised crime; frequently goes missing from care or home, is misusing drugs or alcohol themselves; is at risk of modern slavery, trafficking or exploitation; is in a family circumstance presenting challenges for the child; has returned home to their family from care; is showing early signs of abuse and/or neglect; is at risk of being radicalised or exploited and is a privately fostered child.
- All staff should speak to the designated safeguarding lead with regards to any concerns about female genital mutilation. Our teachers know that there is a legal duty placed upon, teachers must report to the police if they discover that an act of female genital mutilation appears to have been carried out on a girl under the age of 18
- If staff have concerns, or an allegation is made about another member of staff (including volunteers) posing a risk of harm to children, then the concern should be referred to the Principal. If the concern is about Principal the member of staff should report this to the chair of governors/management committee. Our staff will comply with the guidelines in part four of Keeping Children Safe in Education.
- All staff and volunteers should raise concerns about poor or unsafe practice and potential failures in our school's/college's safeguarding regime. Staff should follow the school's whistleblowing policy and procedures or contact the NSPCC whistleblowing helpline.

4.5. The Role of Parents

As agreed in the Home/UTC agreement, parents have the following responsibilities that support the UTC in the safeguarding of all children

- Ensure child attends the UTC regularly, appropriately dressed and equipped and that the UTC is notified in good time, but always on the first day, of any absence
- Sharing information with the UTC on any issues that may affect the wellbeing, learning or conduct of their child or others
- Sharing medical information pertinent to the wellbeing of the child
- Ensure that their child is punctual
- Support the UTC values, policies and procedures in regard to professional conduct and respect
- Support the UTC's zero tolerance approach to violence, intoxicants, discrimination and bullying (including cyber bullying)
- Communicate effectively and openly with the designated safeguarding lead (DSL – Claire Gleeson) on any issue of safeguarding.

In the best interests of safeguarding children there may be occasions when the school may consult with other agencies without a parent's or carer's prior knowledge. Our first concern and responsibility is the child's welfare and we have a duty to protect children first and always. Such consultation may result in a formal referral which could prompt visits from social care and/or the police. We fully understand that this can be a very distressing set of circumstances. The UTC will follow the procedures required by the relevant Safeguarding Children Board for the student's home address.

The visit may take place at the school at the request of the police or social care. In the event of the meeting being held at school parents/carers will be asked by the school to remain on the school premises until such time that the police or social care can attend. If parents/carers choose to leave school premises with their child the school will contact the police or social care to inform them of the parent's/carer's decision.

WMUTC will employ the services of an interpreter if required.

4.6. Liaison with Other Agencies

The UTC will:

- work to develop effective links with relevant agencies and cooperate as required with their enquiries regarding child protection matters including attendance and written reports at initial case conferences, core groups and child protection review conferences.
- notify the local Children's Team (see Appendix 3) if:
 - a) it should have to exclude a learner with a Child Protection Plan (whether fixed term or permanently);
 - b) there is an unexplained absence of a pupil with a Child Protection Plan of more than two days' duration from the UTC (or one day following a weekend); or as agreed as part of any child protection or core group plan;
 - c) they are concerned about the welfare of any learner with a Child Protection Plan.

5. Child Protection Matters

If a member of staff has significant concerns about any child, they should make them known to the UTC's Designated Safeguarding Lead (Claire Gleeson) or the Deputy DSL (Simon Maxfield) through the CPOMS reporting and recording system or the Concern Form in Appendix 2 which should be handed to the Designated Safeguarding Lead in person.

Staff should be aware that abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases multiple concerns will overlap with one another. These concerns may include:

- **Physical abuse**

This 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. Typical signs of abuse may include: regular bruising, burns or scalds, bite marks, fractured or broken bones, vomiting, drowsiness or seizures, respiratory problems, or a pattern to injuries. It may also be that the explanation of an injury doesn't appear to match the injury.

- **Emotional abuse**

This involves 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 children that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond the child's developmental capability, as well as over protection and limitation of exploration and learning, or preventing the child from participating in normal social interaction. It may involve seeing or hearing the ill treatment of another. It may involve serious 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, though it may occur alone. Typical signs of abuse may include: struggling to control strong emotions or having strong outbursts; using language, act in a way or know about things you wouldn't expect them to know for their age; isolation from parents; lack of social skills or having few, if any friends.

- **Neglect**

This involves 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.

Neglect may involve a parent or carer failing to:

- a) provide adequate food, clothing and shelter (including exclusion from home or abandonment);
- b) protect a child from physical and emotional harm or danger;
- c) ensure adequate supervision (including the use of inadequate care-givers);
- d) ensure access to appropriate medical care or treatment;
- e) it may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Typical signs of abuse may include: poor hygiene and appearance; health and developmental problems; housing and family issues.

- **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 (e.g. rape, oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may include non-contact activities, such as involving children in looking at, or in the production of, sexual online images, watching sexual activities, or 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. Typical signs of abuse may include: staying away from certain people or seeming frightened of a person; showing sexual behaviour that's inappropriate for their age, such

as being sexually active, being promiscuous or using sexual language; have physical symptoms.

- **Child Sexual Exploitation**

Child sexual exploitation (CSE) involves exploitative situations, contexts and relationships where young people receive something (for example food, accommodation, drugs, alcohol, gifts, money or in some cases simply affection) as a result of engaging in sexual activities. Sexual exploitation can take many forms ranging from the seemingly 'consensual' relationship where sex is exchanged for affection or gifts, to serious organised crime by gangs and groups. What marks out exploitation is an imbalance of power in the relationship. The perpetrator always holds some kind of power over the victim which increases as the exploitative relationship develops. Sexual exploitation involves varying degrees of coercion, intimidation or enticement, including unwanted pressure from peers to have sex, sexual bullying including cyberbullying and grooming. However, it is also important to recognise that some young people who are being sexually exploited do not exhibit any external signs of this abuse.

Children rarely self-report child sexual exploitation so we understand it is vitally important that all staff at WMUTC are aware that some of the following signs may be indicators of child sexual exploitation:

- children who appear with unexplained gifts or new possessions;
- children who associate with other young people involved in exploitation;
- children who have older boyfriends or girlfriends;
- children who suffer from sexually transmitted infections or become pregnant;
- children who suffer from changes in emotional well-being;
- children who misuse drugs and alcohol;
- children who go missing for periods of time or regularly come home late;
- children who regularly miss school or education or do not take part in education

We will remain open to the fact that child sexual exploitation can occur without any of these risk indicators being obviously present and be alert to the potential signs of abuse and neglect and to understand the procedures set out by local multi-agency safeguarding arrangements.

At WMUTC we will provide information and raise awareness of CSE including the signs, vulnerabilities and reporting procedures in line with local children's safeguarding board guidelines.

Our staff will report any concerns regarding children at risk of CSE to the designated safeguarding lead or deputy who will then make a referral and liaise with other relevant statutory agencies, for example, social care, police and health professionals as required.

'Honour Based' Violence

So-called '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. Abuse committed in the context of preserving "honour" often involves a wider network of

family or community pressure and can include multiple perpetrators. Our staff will be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take. All forms of HBV are abuse (regardless of the motivation) and should be handled and escalated as such.

If our staff have any concerns regarding a child that might be at risk of HBV or who has suffered from HBV they will speak to the designated safeguarding lead or deputy. As appropriate the designated safeguarding lead or deputy will activate the local safeguarding procedures by contacting the police and or social care.

Female Genital Mutilation

Female Genital Mutilation (FGM) comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences. Staff will be vigilant and all report ALL and ANY suspicion of FGM to the Designated Safeguarding Lead. The DSL in turn will fulfil the legal duty of the UTC to report the suspected FGM to statutory agencies.

- **Children Missing Education**

Staff at WMUTC are aware that a child going missing from education, particularly repeatedly, can act as a vital warning sign of a range of safeguarding possibilities. This may include abuse and neglect which may include sexual abuse or exploitation and child criminal exploitation. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation or risk of forced marriage. Early intervention is necessary to identify the existence of any underlying safeguarding risk and to help prevent the risks of children going missing in future.

It is essential that all staff follow the UTC procedures for completing registers each and every lesson in order that unauthorised absence can be correctly and swiftly identified. The UTC will inform Wolverhampton LA of any pupil who fails to attend school regularly or has been absent without the UTC's permission for a period of 10 school days or more on a weekly basis. It is essential that ALL staff are vigilant and report any concerns to the designated safeguarding lead.

- **Private Fostering**

When a member of staff or volunteer becomes aware that a young person may be in a private fostering arrangement, that is a child under 16 (or 18 if disabled) is provided with care and accommodation by someone to whom they are not related in that person's home, they should notify the DSL. In turn the DSL will fulfil their duty to notify the local authority who may check the arrangement is suitable and safe for the child.

Where the UTC is involved in arranging for a child to have a short term learning experience, for example a foreign exchange, which will involve their being cared for by a host family, this could amount to 'private fostering'. In such cases the UTC will be deemed the 'regulated activity provider' and is required to obtain enhanced DBS (including barred list) to help determine suitability of the arrangements. Where parents make these arrangements

themselves, then this becomes a private matter between the parents and host parents and the UTC will not be considered the 'regulated activity provider'.

On admission to the UTC, we will take steps to verify the relationship of the adults to the child who is being registered and where reasonably possible we will obtain more than one emergency contact number.

- **Looked after children and previously looked after children**

WMUTC will ensure that staff have the skills, knowledge and understanding necessary to keep looked after children safe and that appropriate staff have the information they need in relation to a child's looked after legal status (whether they are looked after under voluntary arrangements with consent of parents or on an interim or full care order) and contact arrangements with birth parents or those with parental responsibility. They should also have information about the child's care arrangements and the levels of authority delegated to the carer by the authority looking after him/her. The designated safeguarding lead should have details of the child's social worker and the name of the virtual school head in the authority that looks after the child. All staff have the skills, knowledge and understanding to keep previously looked after children safe. When dealing with looked after and previously looked after children we will ensure that all agencies work together and prompt action will be taken when necessary to safeguard these children

The designated teacher

- WMUTC will ensure it has a designated appropriately trained member of staff as Designated Teacher for LAC; currently Philippa Shaw; and ensure that in the absence of the DT the UTC has more than one appropriately trained teacher.
- The designated teacher will work with local authorities to promote the educational achievement of registered children who are looked after and to ensure that this person has appropriate training. On commencement of the sections 4-6 of the Children and Social Work Act 2017, the designated teacher will also have responsibility for promoting the educational achievement of children who have left care through adoption, special guardianship or child arrangement orders or who were adopted from state care outside England and Wales.

Virtual school heads

- The designated teacher will work with the virtual school head to discuss how looked after children pupil premium plus funding can be best used to support the progress of looked after children in the school and meet the needs identified in the child's personal education plan.
- The designated teacher will work with the virtual school headteacher to promote the educational achievement of previously looked after children.

Care leavers (new section)

WMUTC knows that the local authority has ongoing responsibilities to young people who cease to be looked after and become care leavers.

- Designated safeguarding leads will obtain details of the local authority Personal Advisor appointed to guide and support the care leaver, and should liaise with them as necessary regarding any issues of concern affecting the care leaver.

- **Children with Special Educational Needs and Disabilities**

Our governors know that children with special educational needs and disabilities may face additional safeguarding challenges

- Our safeguarding policy reflects the fact that additional barriers can exist when recognising abuse and neglect in children with special educational needs and disabilities. This can include:
- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration;
- Being more prone to peer group isolation than other children;
- Children with SEN and disabilities can be disproportionately impacted by things like bullying- without outwardly showing any signs; and
- Communication barriers and difficulties in overcoming these barriers.

To address these additional challenges WMUTC will consider extra pastoral support for these children when necessary.

- **Peer on Peer Abuse**

ALL staff should recognise that children can abuse their peers. WMUTC will ensure that ALL staff are clear about our school's/college's policy and procedures with regard to peer on peer abuse

There is no clear distinction between incidents that should be regarded as abusive and incidents more dealt with as bullying. This is matter of professional judgement as bullying, harassment and fighting between children is not generally considered a child protection matter. However, it may be appropriate to regard a young person's behaviour as abusive if there is a large difference in power (age, size, ability, development), the perpetrator has repeatedly tried to harm one or more other children or there are concerns about the alleged perpetrator.

Children are vulnerable to abuse by their peers and such abuse should not be dismissed as normal behaviour for children. Peer on peer abuse can take place using IT, for example sexting or cyber bullying, as well as in person. Children who have been the victims of violent crime (for example mugging) will be more vulnerable to abuse and may respond to this by themselves abusing younger or weaker children.

Where a member of staff is concerned that a child has been the victim of peer on peer abuse, they should notify the DSL without delay. Where peer on peer abuse is identified the DSL will refer the matter to WSCB and support them in responding to the matter. The UTC will use the following guiding principles for dealing with these situations:

- The needs of the victim and the needs of the alleged perpetrator must be considered separately;
- In addition to safeguarding the identified victim, agencies must consider whether the alleged perpetrator seems to pose a risk to any other children;
- Children and young people who abuse others are responsible for their abusive behaviour, and safeguarding action must include addressing their behaviour and its causes;

- The alleged perpetrator is likely to have considerable unmet needs as well as posing a significant risk of harm to other children;
- There should be a co-ordinated approach by child welfare, youth offending, education and health agencies. No agency should start a course of action that has implications for any other agency without appropriate consultation.

It is not enough for the UTC to respond to incidents of peer on peer abuse. All staff have a responsibility to contribute to an ethos and environment that actively discourages abuse and challenges the attitudes that underlie it. They recognise that abuse is abuse and will never be tolerated or passed off as “banter” “just having a laugh” or “part of growing up”. The UTC have clear policies on bullying and harassment as well as on professional conduct and respect. Staff are trained to recognise the different forms of peer on peer abuse, such as: sexual violence and harassment, physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm; sexting; and initiation/hazing type violence and rituals.

- **Sexual violence and harassment between children**

If an incident of sexual violence or sexual harassment occurs WMUTC will follow the guidance set out in Part 5 of Keeping Children Safe in Education and we will use the DfE guidance Sexual violence and harassment between children in schools and colleges (May 2018)

Sexual violence and sexual harassment can occur between two children of any age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, likely, adversely affect their educational attainment. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and offline (both physical and verbal) and are never acceptable.

At WMUTC all victims will be taken seriously and offered appropriate support. We know that some groups are potentially more at risk. Evidence shows girls, children with SEND and LGBT children are at greater risk.

Staff are aware and know the importance of:

- making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up;
- not tolerating or dismissing sexual violence or sexual harassment as “banter”, “part of growing up”, “just having a laugh” or “boys being boys”; and
- challenging behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them.

Sexual violence

Our staff are aware of sexual violence and the fact children can, and sometimes do, abuse their peers in this way. When referring to sexual violence we are referring to sexual offences under the Sexual Offences Act 2003 as described below:

Legislation.

Rape: A person (A) commits an offence of rape if: he intentionally penetrates the vagina, anus or mouth of another person (B) with his penis, B does not consent to the penetration and A does not reasonably believe that B consents.

Assault by Penetration: A person (A) commits an offence if: s/he intentionally penetrates the vagina or anus of another person (B) with a part of her/his body or anything else, the penetration is sexual, B does not consent to the penetration and A does not reasonably believe that B consents.

Sexual Assault: A person (A) commits an offence of sexual assault if: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents.

Consent

Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another, e.g. to vaginal but not anal sex or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity and each time activity occurs. Someone consents to vaginal, anal or oral penetration only if s/he agrees by choice to that penetration and has the freedom and capacity to make that choice.

Sexual harassment

Sexual harassment means 'unwanted conduct of a sexual nature' that can occur online and offline. For this policy, reference to sexual harassment, is 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 (we will consider 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:
 - non-consensual sharing of sexual images and videos;
 - sexualised online bullying;
 - unwanted sexual comments and messages, including, on social media; and
 - sexual exploitation; coercion and threats

WMUTC response to a report of sexual violence or sexual harassment

WMUTC will follow the guidance set out in part 5 Keeping Children Safe in Education and the DfE guidance Sexual violence and sexual harassment between children in schools and colleges -May 2018

- Any decisions made upon receipt of a concern will be made on a case-by-case basis by the designated safeguarding lead or deputy who will liaise with social care and or the police if necessary.
- All staff who have a concern regarding sexual violence or sexual harassment will speak with and report their concern to the designated safeguarding lead or deputy immediately
- All victims will be reassured that they are being taken seriously and they will be supported.
- All staff will act in the best interest of the student
- Our staff will be supportive and respectful of the student
- Our staff will listen carefully to the student, they will be non-judgemental and will not ask leading questions
- Our staff will not promise confidentiality and will explain that the information will be shared with those people who will be able to help and progress the report.
- A record of the report will be made. Best practice is to wait until the end of the report and immediately write up a thorough summary. It may be appropriate to make notes during the report however staff must remain engaged with the student, listen very carefully and not be distracted by note taking.
- The record will only include the facts as the student presents them. We understand that the notes should not reflect the personal opinion of the note taker and we are aware that the notes could become part of a statutory assessment by social care or part of a criminal investigation
- Where the concern includes an online element, we know we should not view or forward any images unless there is a valid reason to do so and we will follow the DfE guidance set out in Screening, searching and confiscation (January 2018) advice.
- Where possible we will try to manage and record an initial report with two members of staff present preferably one of them being the designated safeguarding lead or deputy.
- If the designated safeguarding lead or deputy is not involved in the initial report the staff member will speak to the designated safeguarding lead or deputy immediately.

Risk assessment

If we receive a report of sexual violence or harassment, the designated safeguarding lead or deputy will make an immediate risk and needs assessment. This will be considered on a case-by case basis

Our risk and needs assessment will consider:

- the victim, especially their protection and support;
- the alleged perpetrator; and
- all the other children (and, if appropriate, adult students and staff) at the UTC especially any actions that are appropriate to protect them

Our risk assessment will be an electronic record and will be reviewed and updated regularly. We will continually and actively consider the risks posed to all children/students and we will put adequate measures in place to protect and keep them safe.

Our designated safeguarding lead or deputy will engage with children's social care and specialist services as required. Where there has been a report of sexual violence, it is likely that professional risk assessments by social workers and or sexual violence specialists will be required. Any such professional assessments should be used to inform the UTC's approach to supporting and protecting our children/students and will be used to update our own risk assessment.

Actions to consider following a report of sexual violence and/or sexual harassment

Following a report of sexual violence and/or harassment we will consider:

- the wishes of the victim in terms of how they want to proceed (in an age appropriate way.) This is especially important in the context of sexual violence and sexual harassment. Victims will be given as much control as is reasonably possible over decisions regarding how any investigation will be progressed and any support that they will be offered;
- the nature of the alleged incident(s), including: whether a crime may have been committed and consideration of harmful sexual behaviour;
- the ages of the children involved;
- the developmental stages of the children involved;
- any power imbalance between the children. For example, is the alleged perpetrator significantly older, more mature or more confident? Does the victim have a disability or learning difficulty?
- if the alleged incident is a one-off or a sustained pattern of abuse;
- are there ongoing risks to the victim, other children, adult students or school or college staff; and
- other related issues and wider context e.g. contextual safeguarding.

Managing a report

We will consider every report on a case-by-case basis. When to inform the alleged perpetrator will be carefully considered. Where a report is going to be made to children's social care and/or the police, then, generally, our school/college will speak to the relevant agency and discuss next steps and how the alleged perpetrator will be informed of the allegations. However, as per general safeguarding principles, this will not stop our school/college taking immediate action to safeguard our children, where required.

The UTC will consider four likely scenarios when managing any reports of sexual violence and/or sexual harassment.

We will either manage the report:

1. Internally

2. Consider early help
3. Refer to social care
4. Report to the police

Considering bail conditions

Our school will have due regard for the information available in KCSiE part 5 and the DfE sexual violence and harassment guidance regarding bail conditions.

- When there is a criminal investigation, without bail conditions, the UTC will work with children's social care and the police to support the victim, alleged perpetrator and other children/students involved (especially potential witnesses). Where required, we will seek advice from the police to help the UTC manage our safeguarding responsibilities.
- The term 'Released Under Investigation' or 'RUI' will replace those previously on bail for offences in circumstances that do not warrant the application of bail to either re-attend on a particular date or to include conditions preventing activity or in some cases ensuring compliance with an administrative process.
- Where bail is deemed proportionate and necessary, the UTC will work with children's social care and the police to manage any implications and safeguard our students. An important consideration will be to ensure that the victim can continue in their normal routine, including continuing to receive a suitable education.

Managing any delays in the criminal process

- There may be delays in any case that is being progressed through the criminal justice system. The UTC will not wait for the outcome (or even the start) of a police investigation before protecting the victim, alleged perpetrator and other children in the school or college. We will use a risk assessment to help inform any decision.
- Whilst protecting children and/or taking any disciplinary measures against the alleged perpetrator, our designated safeguarding lead or deputy will work closely with the police (and other agencies as required), to ensure any actions our school/college take do not jeopardise the police investigation.
- If our school/college has questions about the investigation, we will ask the police.

The end of the criminal process

If a student is convicted or receives a caution for a sexual offence, the UTC will update our risk assessment, ensure relevant protections are in place for all the students at the UTC and we will consider any suitable action in light of our behaviour policy. If the perpetrator remains at the UTC with the victim, we will be very clear as to our expectations regarding the perpetrator now they have been convicted or cautioned. This could include expectations regarding their behaviour and any restrictions the UTC thinks are reasonable and proportionate regarding the perpetrator's timetable.

We will ensure both the victim and alleged perpetrator remain protected, especially from any bullying or harassment (including online).

Where cases are classified as “no further action” (NFA’d) by the police or Crown Prosecution Service, or where there is a not guilty verdict, we will continue to offer support to the victim and the alleged perpetrator for as long as is necessary. A not guilty verdict or a decision not to progress with their case will likely be traumatic for the victim. The fact that an allegation cannot be substantiated does not necessarily mean that it was unfounded. We will discuss any decisions with the victim in this light and continue to offer support. The alleged perpetrator is also likely to require ongoing support for what will have likely been a difficult experience.

Safeguarding and supporting the victim

The following principles are based on effective safeguarding practice and will help shape any decisions regarding safeguarding and supporting the victim.

- The age and the developmental stage of the victim
- The needs and wishes of the victim will be paramount (along with protecting the child) in any response. It is important they feel in as much control of the process as is reasonably possible. Wherever possible, the victim, if they wish, should be able to continue in their normal routine. Overall, the priority will be to make the victim’s daily experience as normal as possible, so that our school/college is a safe space for them.
- The victim should never be made to feel they are the problem for making a report or made to feel ashamed for making a report.
- Consider the proportionality of the response. Support should be tailored on a case-by-case basis. The support required regarding a one-off incident of sexualised name-calling is likely to be vastly different from that for a report of rape. Support can include: Children and Young People’s Independent Sexual Violence Advisors (ChISVAs), Rape Crisis, The Survivors Trust, CAMHS, Rape Crisis centres and the Internet Watch Foundation

Victims may not disclose the whole picture immediately. They may be more comfortable providing information on a piecemeal basis. It is essential that dialogue is kept open and encouraged. When ongoing support will be required, we will ask the victim if they would find it helpful to have a designated trusted adult (for example, their form tutor or designated safeguarding lead) to talk to about their needs. The choice of any such adult should be the victim’s. We will respect and support this choice.

We understand that a victim of sexual violence is likely to be traumatised and, in some cases, may struggle in a normal classroom environment. While we will avoid any action that would have the effect of isolating the victim, in particular from supportive peer groups, there may be times when the victim finds it difficult to maintain a full-time timetable and may express a wish to withdraw from lessons and activities. This should be because the victim wants to, not because it makes it easier to manage the situation. If required, we will provide a physical space for victims to withdraw.

We will do everything we reasonably can to protect the victim from bullying and harassment as a result of any report they have made.

Whilst the victim will be given all the necessary support to remain in the UTC, if the trauma results in the victim being unable to do this, alternative provision or a move to another school/college should be considered to enable them to continue to receive suitable

education. This should only be at the request of the victim (and following discussion with their parents or carers).

If the victim does move to another educational institution (for any reason), the new educational institution will be made aware of any ongoing support needs. The designated safeguarding lead will take responsibility to ensure this happens (and should discuss with the victim and, where appropriate their parents or carers as to the most suitable way of doing this) as well as transferring the child protection file.

Safeguarding and supporting the alleged perpetrator

The following principles are based on effective safeguarding practice and will help shape any decisions regarding safeguarding and supporting the alleged perpetrator:

The age and the developmental stage of the alleged perpetrator and nature of the allegations. Any child will likely experience stress as a result of being the subject of allegations and/or negative reactions by their peers to the allegations against them.

Consider the proportionality of the response. Support (and sanctions) will be considered on a case-by-case basis. An alleged perpetrator may potentially have unmet needs (in some cases these may be considerable) as well as potentially posing a risk of harm to other children. Harmful sexual behaviours in young children may be (and often are) a symptom of either their own abuse or exposure to abusive practices and or materials. We will seek advice, as appropriate, from children's social care, specialist sexual violence services and the police.

It is important that if the alleged perpetrator does move to another educational institution (for any reason), that the new educational institution is made aware of any ongoing support needs and where appropriate, potential risks to other children and staff. The designated safeguarding lead will take responsibility to ensure this happens as well as transferring the child protection file.

- **Child criminal exploitation: county lines**

Criminal exploitation of children is a geographically widespread form of harm that is a typical feature of county lines criminal activity: drug networks or gangs groom and exploit children and young people to carry drugs and money from urban areas to suburban and rural areas, market and seaside towns. Key to identifying potential involvement in county lines are missing episodes, when the victim may have been trafficked for the purpose of transporting drugs. A referral to the National Referral Mechanism will be considered by the UTC. Like other forms of abuse and exploitation, county lines exploitation:

- can affect any child or young person (male or female) under the age of 18 years;
- can affect any vulnerable adult over the age of 18 years;
- 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;
- can be perpetrated by individuals or groups, males or females, and young people or adults; and
- is typified by some form of power imbalance in favour of those perpetrating the exploitation. Whilst age may be the most obvious, this power imbalance can also be due to

a range of other factors including gender, cognitive ability, physical strength, status, and access to economic or other resources.

- **Children and the court system**

Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. WMUTC will use the age appropriate guides to support children, 12-17 year olds. Making child arrangements via the family courts following separation can be stressful and entrench conflict in families. This can be stressful for children. WMUTC will use the Ministry of Justice online child arrangements information tool to support this process and will make this information available to parents and carers if they require our assistance.

- **Children with family members in prison**

Some children who attend our school may have a parent who has been sent to prison. WMUTC will utilise the information NICCO provides designed to support professionals working with offenders and their children, to help mitigate negative consequences for those children.

- **Domestic Abuse**

Domestic violence and abuse is:

Any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass, but is not limited to:

- psychological;
- physical;
- sexual;
- financial; and
- emotional

Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result. Domestic abuse affecting young people can also occur within their personal relationships, as well as in the context of their home life. WMUTC will make use of the advice and links available in Keeping Children Safe in Education (Annex A) to identify children who are affected by domestic abuse and how they can be helped.

- **Homelessness**

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. When required our designated safeguarding lead or deputies will obtain contact details and know referral routes in to the Local Housing Authority so they can raise/progress concerns at the earliest opportunity. Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property. Whilst referrals and or discussion with the Local Housing

Authority should be progressed as appropriate, this does not, and will not, replace a referral into children's social care where a child has been harmed or is at risk of harm.

WMUTC staff will consider homelessness in the context of children who live with their families, and intervention will be on that basis. However, we will also recognise in some cases 16 and 17 year olds could be living independently from their parents or guardians, for example through their exclusion from the family home, and will require a different level of intervention and support. Children's services will be the lead agency for these young people and our designated safeguarding lead (or a deputy) will ensure appropriate referrals are made based on the child's circumstances.

- **Risk of Radicalisation**

Protecting children from the risk of radicalisation should be seen as part of UTCs' wider safeguarding duties, and is similar in nature to protecting children from other forms of harm and abuse. During the process of radicalisation, it is possible to intervene to prevent vulnerable people being radicalised. Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups. Extremism is the vocal or active opposition to our fundamental values, including the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces. There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. It can happen in many different ways and settings. Specific background factors may contribute to vulnerability which are often combined with specific influences such as family, friends or online, and with specific needs for which an extremist or terrorist group may appear to provide an answer. The internet and the use of social media in particular has become a major factor in the radicalisation of young people. Any member of staff who has concern regarding a child being at risk of radicalisation should speak with the Designated Safeguarding Lead, who will in collaboration with that member of staff complete a referral form and UTC risk assessment. The DSL will make a referral to Channel where a child is believed to be at risk of radicalisation.

The UTC is also aware of:

- bullying including cyberbullying (See Anti-Bullying and Harassment Policy)
- children missing from home or care
- drugs
- fabricated or induced illness
- faith abuse
- gangs and youth violence
- gender based violence / violence against women and girls (VAWG)
- hate
- mental health
- relationship abuse
- sexting
- trafficking
- Modern slavery

In all cases, if you are worried that a child is being abused, watch out for any unusual behaviour, including: being withdrawn; suddenly behaving differently, anxiety; depression; clinginess;

aggression; sleeping problems; eating disorders; bed wetting; soiled clothes; risk taking; school absence; changes in eating habits; obsessive behaviour; nightmares; drugs; alcohol; self-harm; thoughts about suicide.

Often the safeguarding team will refer children and their families for an Early Help Assessment (EHA). Early Help is a collaborative approach not a provision. Some children, either because of their needs or circumstances will require extra support to be healthy and safe and to achieve their potential. In Wolverhampton the Early Help approach has been developed on the basis that:

- A whole family assessment is the best way to meet the needs of any child that is identified as requiring additional support.
- A timely response is essential for families who need additional support and we seek to offer support quickly to reduce the impact of problems that may have already emerged.
- Early Help may be needed at any point in a child or young person's life
- Families are best supported by those who already work with them
- Additional support needs to be agreed with the family and co-ordinated efficiently to bring together a Team Around the Family from other local partners as needed.

For children whose needs and circumstances make them more vulnerable, a coordinated multi-disciplinary approach is usually best, based on an Early Help Assessment, with a Lead Professional to work closely with the child(ren) and family to ensure that each family member receives all the support they require. A range of Targeted Services are available to support these interventions. Where a child is subject to Early Help, the DSL (or deputy) of the school will normally be involved in supporting the child.

For Child Protection or Child in Need cases, the DSL will work in support of and under the guidance of the attached social services team. The DSL will ensure that the UTC attend as required all case conferences and other strategy meetings in supporting the best interests of the child.

6. Talking to and listening to children

WMUTC aims to operate a visible culture of listening. If a child chooses to disclose, staff should:

- be accessible and receptive;
- listen carefully and uncritically at the child's pace;
- take what is said seriously;
- reassure the child that they are right to tell;
- tell the child that the information will be passed on;
- make a careful record of what was said.

Staff must never:

- take photographs or examine an injury;
- investigate or probe aiming to prove or disprove possible abuse – never ask leading questions;
- make promises to children about confidentiality or keeping 'secrets';
- assume that someone else will take the necessary action;
- jump to conclusions or react with shock, anger or horror;
- speculate or accuse anybody;
- confront another person (adult or child) allegedly involved;

- offer opinions about what is being said or about the persons allegedly involved;
- forget to record what they have been told. Staff must always use the Safeguarding Concern Form in Appendix 2);
- fail to pass the information on to the Designated Safeguarding Lead or their Deputy;
- ask a child to sign a written copy of the disclosure.

For children with communication difficulties or who use alternative/ augmented communication systems, extra care must be taken to ensure that signs of abuse and neglect are identified and interpreted correctly, but concerns should be reported in exactly the same manner as for other children. A learner's Individual Learning Plan should be taken into account seeking guidance from the Vice Principal, Student Welfare Leader or the SENDCO if necessary without disclosing and details of the Safeguarding issue in hand.

7. Reporting and Record Keeping

7.1. Reporting of incidents

(See Appendix 2 and for further guidance available on the Wolverhampton Safeguarding Children website)

Well-kept records are essential in situations where it is suspected or believed that a child may be at risk from harm. Staff should be mindful that records may be used as evidence in Child Protection Conferences and be presented as legal evidence and hence:

Reports should:

- be entered into CPOMS (Child Protection Online Monitoring System) or on the template provided in Appendix 2.
- state who was present, time, date and place;
- use the child's words wherever possible;
- be factual/state exactly what was said;
- differentiate clearly between fact, opinion, interpretation, observation and/or allegation;
- be written in ink and signed by the recorder.
- Be completed and handed to the DSL or a deputy as a matter of urgency with any other related notes and / or diagrams attached

Staff wishing to report a possible child protection concern should use the CPOMS reporting and recording system which will immediately alert the Designated Safeguarding Leads.

There is also an appropriate proforma in the staffroom, as appendix 2 to this document, on Sharepoint (WMUTC/Governors/Policies/ Safeguarding Forms) or from any of the Safeguarding team if CPOMS is unavailable (Claire Gleeson, Simon Maxfield). Completed forms should be given in person to one of the above members of staff.

PLEASE REMEMBER where you consider a child is in immediate danger or at risk of harm (as opposed to having concerns about a child) then you should refer immediately to the DSL/DDSL, WSCB or the Police and then notify the DSL that you have done so.

7.2 Record Keeping

The DSL will keep clear detailed written records of concerns about learners (noting the date, event and action taken), even where there is no need to refer the matter to Social Care immediately. Records are stored securely on the CPOMS system.

Any existing or transferred written records will be kept in a folder in a meticulous chronological order- model and kept locked in a secure location. All relevant child protection records will be sent to the receiving school/UTC, college or other education establishment if a learner moves and a receipt obtained for their transfer in a timely manner. In all other cases, records of child protection will be maintained until the child's 25th birthday.

Upon receipt of an incident alert, the DSL will in the first instance have a conversation with the reporting member of staff to clarify and ensure that all details are adequately recorded and understood. The DSL will then determine if the child has a Safeguarding File or not. If the child does not have a Safeguarding File and the DSL considers that the incident is not a safeguarding matter, then it will be recorded as a 'Near-Miss' on CPOMS notifying the date (and possible subsequent dates) of the report for that child. Any information received from other agencies, meeting minutes or other notes will also be stored within the CPOMS system. Children who become CIN or CP, will be clearly categorised on CPOMS. Each incident report requires the DSL or a deputy to complete and outline what action has taken place and the decision (with reasons) for action taken.

All written files are locked in a secure storage area, separate from the child's main school file. Access to these files is limited to the DSL. Access for other designated staff can only be achieved through collaboration with the Principal's PA to gain access to the relevant office.

8. Communication With Parents

The UTC will:

- undertake appropriate discussion with parents prior to involvement of another agency unless the circumstances preclude this;
- ensure that parents have an understanding of the responsibility placed on the UTC and staff for child protection by setting out its obligations on the UTC website

9. Supporting The Learner At Risk

We recognise that children who are abused or witness violence may find it difficult to develop a sense of self-worth and to view the world as benevolent and meaningful. They may feel helplessness, humiliation and some sense of self-blame.

This UTC may be the only stable, secure and predictable element of the lives of children at risk. Nevertheless, when at the UTC their behaviour may be challenging and defiant or they may be withdrawn.

We recognise that some children actually adopt abusive behaviours and that these children must be referred on for appropriate support and intervention.

The UTC will endeavour to support the learner through the content of the curriculum to encourage self-esteem, self-motivation and Safeguarding Awareness. In addition, The UTC's PCR policy (UTC

behaviour policy) is aimed at supporting vulnerable learners. All staff will agree on a consistent approach, which focuses on the behaviour of the offence committed by the learner but does not damage the learner's sense of self-worth. The UTC will also seek to ensure that the learner knows that some behaviour is unacceptable but s/he is valued and is not to be blamed for any abuse which has occurred.

The UTC will liaise with other relevant Local Authority agencies which support the learner such as Social Care, Child and Adolescent Mental Health Services, the Educational Psychology Service, Behaviour Support Service and the Education Social Work Service. It will also ensure: a commitment to develop productive and supportive relationships with parents whenever it is in a learner's best interest to do so; recognition that children living in a home environment where there is a domestic violence, drug or alcohol abuse are vulnerable and in need of support and protection; that it vigilantly monitors children's welfare, keeping records and notifying Social Care as soon as there is a recurrence of a concern.

When a learner with a Child Protection Plan leaves, information will be transferred to the new provider immediately. The Independent Reviewing Officers Manager of the relevant Local Authority will also be informed. Where the learner's destination is unknown, the 'Missing Children' procedures for the relevant Local Authority must be followed. (Obtained from Principal Education Social Worker, LADO).

10. Whistleblowing Procedures

All staff, volunteers and parents at West Midlands UTC should feel able to raise concerns about poor or unsafe practice and potential failures in our safeguarding regime and such concerns will be taken seriously by our Principal, governing body and senior leadership team. Appropriate whistleblowing procedures, which are suitably reflected in staff training and staff behaviour policies, are in place for such concerns to be raised with our Principal, governing body or senior leadership team.

Whistleblowing is the mechanism by which staff can voice their concerns over a child protection failure that they feel they cannot raise internally, made in good faith, without fear of retribution or disciplinary action. Staff should acknowledge their individual responsibilities to bring matters of concern to the attention of senior management and/or relevant external agencies. This is particularly important where the welfare of children may be at risk.

Where a staff member feels unable to raise an issue with our Principal, governing body or senior leadership team or feels that their genuine concerns are not being addressed, other whistleblowing channels are open to them, for example:

The Local Authority Designated Officer (LADO) is involved with the management and oversight of cases dealing with allegations against people who work with children. Contact details can be found in Appendix 5.

The NSPCC whistleblowing helpline is available for staff who do not feel able to raise concerns regarding child protection failures internally. Staff can call: 0800 028 0285 – line is available from 8:00 AM to 8:00 PM, Monday to Friday and Email: help@nspcc.org.uk

11. Drug Use and Child Protection

The discovery that a young person is using illegal drugs or reported evidence of their drug use is not necessarily sufficient in itself to initiate child protection proceedings but the UTC will consider such action in the following situations:

When there is evidence or reasonable cause:

- to believe the young person's drug misuse may cause him or her to be vulnerable to other abuse such as sexual abuse;
- to believe the learner's drug related behaviour is a result of abusing or endangering pressure or incentives from others, particularly adults;
- where the misuse is suspected of being prompted by serious parent/carer drug misuse.

12. Children of Drug Using Parents

Further enquiries and/or further action will be taken when the UTC receives reliable information about drug and alcohol abuse by a child's parents/carers in the following circumstances:

- the parental misuse is regarded as problematic (i.e. multiple drug use including injection);
- a chaotic and unpredictable home environment exists which can be attributed to drug or alcohol misuse;
- children are not being provided with acceptable or consistent levels of social and health care;
- children are exposed to criminal behaviour.

13. Preventing Unsuitable People From Working With Children

The UTC will operate safer recruitment practices including ensuring appropriate DBS and reference checks are undertaken according to the DfE document 'Keeping Children Safe in Education, September 2018. These practices are described in detail as part of our **WMUTC Safeguarding and Safer Recruitment** document.

The UTC will maintain a Single Central Record of check including Enhanced DBS checks, Barred list checks, Prohibition order checks, Section 128 Direction checks (for UTC leadership positions) with dates of when each has been seen. All new employees must show their DBS before or on appointment or as soon as practicable afterwards. All UTC Governors will also complete DBS checks.

The UTC will consult with the relevant Education Safeguarding Children Manager in the event of an allegation being made against a member of staff and adhere to the relevant procedures set out in Keeping Children Safe in Education.

The UTC will ensure that all staff, business partners and volunteers are aware of the need for maintaining appropriate and professional boundaries in their relationships with learners and parents as advised by the relevant Local Authority's Code of Conduct (Wolverhampton as the initial point of reference for the UTC).

The UTC will also ensure that staff, business partners and volunteers are aware that sexual relationships with pupils aged under 18 are unlawful and could result in legal proceedings taken against them under the Sexual Offences Act 2003 (Abuse of position of trust).

The UTC Appendix: Safeguarding and External Contractors details the procedures for ensuring students are suitably safeguarded when external contractors are working on the UTC site

The UTC is a secure site and procedures describing the opening and closing of the site and arranging visitors to the site are contained within 'WMUTC Visitors Procedures'

14. Confidentiality and Information Sharing

Confidentiality is an issue that needs to be understood by all those working with children, particularly in the context of child protection. This is a complex area and involves consideration of a number of pieces of legislation.

Confidentiality should never be guaranteed to a child as some kinds of information may need to be shared with others. A suggested form of words that may help when talking to children is as follows: "I will keep our conversation confidential and agree with you that information I can share, unless you tell me something that will affect your personal safety or that is illegal, but I will tell you if I am going to pass information on and to whom."

Professionals can only work together to safeguard children if there is an exchange of relevant information between them. This has been recognised in principle by the courts. However, any disclosure of personal information to others, including social service departments, must always have regard to both common and statute law.

Normally, personal information should only be disclosed to third parties (including other agencies) with the consent of the subject of that information (Data Protection Act 2003 and The European Convention on Human Rights, Article 8). Wherever possible, consent should be obtained before sharing personal information with third parties. In some circumstances, however, consent may not be possible or desirable but the safety and welfare of the child dictate that the information should be shared.

The law requires the disclosure of confidential information necessary to safeguard a child or children. Under Section 47 of the Children Act 1989 statutory agencies have a duty to co-operate. Therefore, if the police or social care/services are conducting a Section 47 investigation under the 1989 Children Act, staff must share requested information relevant to the investigation. Legal advice should be sought if in doubt.

In general, the UTC require all staff to apply the 'seven golden rules' of information sharing as outlined in 'Information Sharing March 2015':

1. Remember that the Data Protection Act 1998 and human rights law are not barriers to justified information sharing, but provide a framework to ensure that personal information about living individuals is shared appropriately.
2. Be open and honest with the individual (and/or their family where appropriate) from the outset about why, what, how and with whom information will, or could be shared, and seek their agreement, unless it is unsafe or inappropriate to do so.
3. Seek advice from other practitioners if you are in any doubt about sharing the information concerned, without disclosing the identity of the individual where possible.
4. Share with informed consent where appropriate and, where possible, respect the

wishes of those who do not consent to share confidential information. You may still share information without consent if, in your judgement, there is good reason to do so, such as where safety may be at risk. You will need to base your judgement on the facts of the case. When you are sharing or requesting personal information from someone, be certain of the basis upon which you are doing so. Where you have consent, be mindful that an individual might not expect information to be shared.

5. Consider safety and well-being: Base your information sharing decisions on considerations of the safety and well-being of the individual and others who may be affected by their actions.

6. Necessary, proportionate, relevant, adequate, accurate, timely and secure: Ensure that the information you share is necessary for the purpose for which you are sharing it, is shared only with those individuals who need to have it, is accurate and up-to-date, is shared in a timely fashion, and is shared securely.

7. Keep a record of your decision and the reasons for it – whether it is to share information or not. If you decide to share, then record what you have shared, with whom and for what purpose.

The UTC are committed to complying with the principles laid out in 'Information Sharing March 2015' and in all cases of doubt advice in the document will supersede this policy.

15. Referrals

Referrals should initially be raised as a Safeguarding Concern via CPOMS (or appendix 2 in the event of CPOMS not being available) and then followed via the relevant Local Authority procedures detailed in Appendix 3.

16. Thresholds and types of referral

There are three thresholds for and types of referral that need to be considered:

1) Early Help Assessment (EHA)

The Early Help Assessment (EHA) is considered for when:

- there are concerns about how well a child is progressing in terms of their health, welfare, behaviour, progress in learning or any other aspect of their well-being;
- the child's needs are unclear or broader than a single service can address.

An EHA should be completed when a professional in any agency has concerns that a child will not progress/develop without additional services. Completing a common assessment should:

- enable the professional to identify the child's needs;
- provide a structure for systematic gathering and recording of information;
- record evidence of concerns and a base-line for measuring progress in addressing them;
- provide a framework for a referral discussion to Children's Social Care for a Children and Family assessment or to another service for a specialist assessment.

The guidance further outline that completing a Multi-Agency Referral Form (MARF) provides a standardised pro-forma to support a telephone referral to the appropriate Safeguarding Children

Board should it be necessary at a future stage. However, the guidance emphasises the need to take all disclosures as potentially serious and state that where there is an immediate need to protect a child, professionals must contact Children's Social Care and/or the police directly and make a referral, rather than completing an EHA in line with the interagency procedures. (See Appendix 3)

2) Children in Need

According to Section 17 of the Children Act 1989 a child is in need if:

- they are unlikely to achieve or maintain, or to have opportunity to achieve or maintain, a reasonable standard of health or development, without the provision of services by a local authority;
- their health or development is likely to be impaired, or further impaired without the provision of such services;
- they are disabled.

If this is a child in need, the issues must be discussed with the Designated Safeguarding Lead and then with parents/carers. The DSL will seek advice from the relevant Safeguarding Body that the child resides or any other agency.

3) Children At Risk

If this is a child protection matter, this should be discussed with the Designated Safeguarding Lead or his deputy and a safeguarding referral made as soon as possible.

According to Section 47 of the Children Act 1989 it is a child protection matter where:

- children are at risk or are suffering significant harm;
- children are suffering the effects of significant harm;
- children are suffering serious health problems.

It is the 'significant harm' threshold that justifies statutory intervention into family life. A professional making a child protection referral under S.47 must therefore provide information which clearly outlines that a child is suffering or likely to suffer significant harm.

It is not possible to rely on one absolute criterion when judging what constitutes significant harm. Consideration of the severity of ill-treatment may include the extent of the harm suffered, the context within which it occurred and its duration.

Significant harm may also arise from a combination of significant events which are both acute and long standing and which may impair the child's physical, psychological and social development. In order to both understand and establish significant harm, it is necessary to consider the family context, together with the child's development within their wider social and cultural environment. It is also necessary to consider any special needs, e.g. medical condition, communication difficulties or disability that may affect the child's development and care within the family. The nature of harm, in terms of ill-treatment or failure to provide adequate care also needs consideration alongside the impact on the child's health and development and the adequacy of care provided.

17. Making a children in need/children at risk referral

Where a child is registered at the UTC a written record of concerns should be made using the UTC's internal recording form (see Appendix 2). This should then be given to the Designated Safeguarding Lead or his deputy (see Appendix 1) who will then normally make the decision about whether a referral needs to be made.

The agency to whom a referral is made is dependent upon where the learner resides (See Appendix 3)

Contact with these agencies will normally be made by the Designated Safeguarding Lead or their deputy/ies. However, everybody has a responsibility for safeguarding learners and the right to make a referral but all should, as a matter of protocol, discuss concerns with the Designated Safeguarding Lead at WMUTC in the first instance.

Therefore, if the advice of the Designated Safeguarding Lead or their deputy/ies has been sought, and that advice is that a referral is not necessary, the person with the original concern may, if they deem it necessary, make a referral themselves.

Telephone referrals will need to be followed up with a multi-agency referral form. These forms can be downloaded from the appropriate Local Safeguarding Children Board website. (See Appendix 3)

18. Attendance at Child Protection Conferences

The Designated Person for Child Protection or their deputy/ies will be expected to attend the initial Child Protection Conference. If a child is made subject to a Child Protection Plan it may be more relevant for the child's mentor to attend the subsequent core group meetings.

19. E-safety

WMUTC allows learners to bring personal mobile devices into the UTC to support their learning and the acceptable usage of devices is outlined in the PCR policy (UTC behaviour policy) and E-Safety Policy. Our E-Safety Policy is set out in a separate document and is reviewed regularly by the governing body. It reflects that e-safety is not an ICT issue but a safeguarding issue and that we need to balance keeping children safe with allowing them the freedom to explore new technologies. Through our policy we intend limiting the risks that young people are subject to. Because it is a rapidly developing and moving issue the governors will review this policy on a regular basis.

The growth of different electronic media in everyday life and an ever developing variety of devices including personal computers, laptops, mobile phones, webcams and so on place an additional risk on our learners.

Internet chat rooms, discussion forums or social networks can all be used as a means of contacting children and young people with a view to grooming them for inappropriate or abusive relationships. The anonymity of the Internet allows adults, often pretending to be children, to have conversations with children and in some cases arrange to meet them.

Access to abusive images is not a 'victimless' act as it has already involved the abuse of children. The internet has become a significant tool in the distribution of indecent photographs of children and should be a concern to all those working with learners at the UTC.

If any member of staff is exposed to an image or images of a student from the UTC in any form of media, this must be reported immediately to an ICT Technician and Director of Finance and Operations and the Designated Safeguarding Lead (Claire Gleeson). If the image is on portable equipment it must be confiscated from the student and taken immediately to the ICT Technician. Under no circumstances must any member of staff give or receive any such images, even for opinion. In doing so there is a potential criminal offence of 'distribution'.

Learners can engage in or be a target of bullying using a range of methods including text and instant messaging to reach their target. Mobile devices can also be used to capture violent assaults of other children for circulation.

Learners will be made aware of the dangers through the curriculum, particularly in PSHCE, assemblies and tutor/company time.

Additional protection will be provided through:

1. Monitoring and filtering software in place to minimise access and to highlight any person accessing inappropriate sites or information;
2. The UTC will employ the use of specialist monitoring from an accredited agency employing highly trained staff to identify and forward concerns.
3. the encouragement of learners to discuss openly their use of technology and anything which makes them feel uncomfortable. (If this results in child protection concerns the Designated Safeguarding Lead should be informed immediately) ;
4. learners being encouraged not to give out their personal details, telephone numbers, home address, computer passwords, etc;

The police will be involved if there is any criminal element to misuse of the internet, telephones or any other form of electronic media. The threshold for involving the Police will be judged by the Designated Safeguarding Lead in consultation with the Principal or other member of The Senior Leadership Team.

20. Sexting (youth produced sexual imagery)

At WMUTC we know and understand that sharing photos and videos online is part of daily life for many of our learners, enabling them to share their experiences, connect with friends and record their lives. Photos and videos can be shared as text messages, email, posted on social media or increasingly via mobile messaging apps, such as Snapchat, Whatsapp or Facebook Messenger. Access to current apps and social media sites that allow 'live streaming' should also be considered.

The increase in the speed and ease of sharing imagery has brought concerns about young people producing and sharing sexual imagery of themselves. This can expose them to risks, particularly if the imagery is shared further, including embarrassment, bullying and increased vulnerability to sexual exploitation.

Although the production of such imagery will likely take place outside of our school, these issues often manifest in schools and organisations working with children and young people. Our school will respond swiftly and confidently to ensure that our learners are safeguarded, supported and educated.

Producing and sharing sexual images of under-18s is also illegal.

Our school will deal with all incidents of youth produced sexual imagery as a safeguarding concern. We will be guided by the principle of proportionality and our primary concern will be the welfare and protection of the young people involved. Our school may respond to incidents without involving the police in accordance with the guidelines set out in the UKCCIS- Sexting in schools and colleges: responding to incidents and safeguarding young people.

Our school will adopt the recommended procedures regarding the law and handling incidents outlined in UKCCIS- Sexting in schools and colleges: responding to incidents and safeguarding young people and DfE guidance – Searching, screening and confiscation (February 2014).

Whilst dealing with an incident our school will:

- Respond immediately to disclosures or incidents in line with our school's safeguarding procedures, staff will notify the Designated Safeguarding Lead (Claire Gleeson) immediately of any concern, incident or disclosure
- Handle devices and imagery according to DfE advice (Searching, Screening and confiscation- February 2014)
- Risk assess situations
- Involve other agencies, including escalation to the police and children's social care
- Record incidents
- Involve parents
- Seek to support our learners
- Support our learners to report youth produced sexual imagery online.
- Provide preventative education

21. Curriculum

Our UTC is committed to the delivery of a safeguarding curriculum as one of the most powerful ways to safeguard young people is through educating them about safe behaviour, risks and safeguarding issues. At WMUTC we believe that wherever appropriate, subject teachers should make reference to safeguarding issues within the wider context of subject curriculums, for example, discussing the issues surrounding social media in an ICT lesson. The UTC PSHE programme delivered through assemblies and classroom sessions on a Thursday addresses many of the issues surrounding safeguarding of young people, including radicalisation, religious tolerance, E-Safety, drugs and alcohol, sex and relationships, gang violence, British Values and bullying.

In combination with booked regular external speakers, the UTC PSHE sessions aim to engage the students actively in activities that explore each of the topics as it is introduced, with a student produced outcome in a future session. The UTC believes that this approach allows students to express their ideas more freely and engages them more than a typical approach to PSHCE might.

When arranging educational visitors to come into school, for example theatre companies, or charities, staff are required to follow the guidance contained within 'WMUTC Assembly Policy'.

From time to time students will engage in visits as part of their broader educational experience. Staff wishing to arrange an external visit should in the first instance speak with the EVC (Simon Maxfield) and then follow the guidance as described in 'Safeguarding Learners on Educational Visits'

22. Preventing Radicalisation (PREVENT)

The national PREVENT strategy 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. We also include in our definition of extremism calls for the death of members of our armed forces, whether in this country or overseas.'

Radicalisation is a very real threat to vulnerable individuals as well as our community on a local, national and global scale. WMUTC is committed to fulfilling its role defined in [The Counter Terrorism and Security Act 2015](#) and all members of staff will receive training in recognising possible risk of radicalisation (WRAP3).

Additionally, through both PSHE and the wider curriculum (which all staff are engaged in) we require staff to create an ethos where students can understand and discuss sensitive topics, including terrorism and the extremist ideas that are part of terrorist ideology, and learn how to challenge these ideas. The Prevent duty is not intended to limit discussion of these issues. WMUTC staff are expected to challenge Islamophobia, anti-Semitism and other prejudices and be mindful of their duties to forbid political indoctrination and secure a balanced presentation of political issues. Under no circumstances should staff promote partisan views, or knowingly allow others to do so.

If a member of staff identifies causes for concern linked to possible radicalisation to violent extremism, they will alert the designated senior person (Leader of Student Welfare and Safeguarding) immediately. If, when more information is gathered there is an immediate risk or emergency then the emergency services would be contacted. If there is no immediate risk but action is required then discussion with the nominated local police officer will take place and this would then determine the further response.

Where there is concern about an individual, the designated senior person (Leader of Student Welfare and Safeguarding) will liaise with the local PREVENT team to ensure an appropriate strategy is put in place to provide support. More information and referral forms (normally completed by the designated person) are available from [Wolverhampton's PREVENT website](#).

During the first school semester each year, a risk assessment will be carried out by the DSL (as designated senior person), supported by the local PREVENT team to identify and plan mitigation for any identified concerns.

In terms of being aware of potential risks and signal events which can impact on our students and out UTC community the UTC will:

- ensure that the UCT staff are aware of and manage potential risks to students and the wider community effectively.

- respond effectively to events, locally, nationally and globally, which could have an impact on individual students and the UTC community.
- regularly review emergency plans and procedures to prepare for future events and risks.

Any member of staff who has concerns regarding a child's risk of being radicalised should make an immediate referral to the DSL who will then complete a risk assessment proforma and seek advice from the Prevent team.

In order to support the effective identification or radicalisation, WRAP3 (Or superseding) training will be arranged each September for the staffing body. For staff beginning at alternate times, guidance on radicalisation will be part of the wider UTC safeguarding training.

23. The use of 'reasonable force' in schools and colleges.

WMUTC and its Governors know and understand there are circumstances when it is appropriate for our staff to use reasonable force to safeguard children and young people. The term 'reasonable force' covers the broad range of actions used by staff that involve a degree of physical contact to control or restrain children. This can range from guiding a child to safety by the arm, to more extreme circumstances such as breaking up a fight or where a young person needs to be restrained to prevent violence or injury. 'Reasonable' in these circumstances means 'using no more force than is needed'. The use of force may involve either passive physical contact, such as standing between pupils or blocking a pupil's path, or active physical contact such as leading a pupil by the arm out of the classroom.

Our school does not adopt a 'no contact' policy, we have a policy which allows and supports our staff to make appropriate physical contact that enables staff to fully support and protect our students. The decision on whether or not to use reasonable force to control or restrain a student is down to the professional judgement of the staff concerned and will always depend on individual circumstances. Staff will be encouraged to self-report to the DSL/DDSL their involvement in a situation where 'reasonable force' has been used.

When using reasonable force in response to risks presented by incidents involving children with SEN or disabilities or with medical conditions, our school/college will consider the risks carefully and recognise the additional vulnerability of these groups. We will also consider our duties under the Equality Act 2010 in relation to making reasonable adjustments, non-discrimination and our Public Sector Equality Duty. By planning positive and proactive behaviour support, for instance through drawing up individual behaviour plans for more vulnerable children, and agreeing them with parents and carers, our school/college can reduce the occurrence of challenging behaviour and the need to use reasonable force.

24. Further Advice

Further advice on safeguarding matters can also be obtained from the Wolverhampton Safeguarding Officer, Education Welfare Senior Practitioner and relevant Local Authority Referral Teams. (See Appendix 3)

25. Resources

Safeguarding is important to all staff. The Governing Body has to ensure that sufficient resources are made available to enable the necessary tasks to be carried out properly under Local Authority Safeguarding Children Board procedures, including the attendance at meetings, collating and writing assessment reports, and staff training. The Governing Body will also ensure that all governors have an understanding of safeguarding issues and that policy and procedures are in place in the UTC to safeguard and promote the welfare of all learners.

Safeguarding awareness will be addressed through the curriculum as appropriate to ensure all the learners understand what is meant by safeguarding and how they can be safe.

26. DfE Guidance and other documentation has been used to create this document. The specific guidance documents include:

- [Keeping children safe in education \(2018\)](#)
- [Working together to safeguard children \(2018\)](#)
- [What to do if you're worried a child is being abused \(2015\): advice for practitioners](#)
- [Prevent Strategy - HM Government](#)
- [Information sharing 2018: advice for practitioners providing safeguarding services to children, young people, parents and carers](#)
- [Guidance for Safer Working Practices 2015](#)

27. Other policies and Appendices relevant to this:

WMUTC Safeguarding and Safer Recruitment
WMUTC Safeguarding and External Contractors
WMUTC Safeguarding & Allegations of Abuse
WMUTC Safeguarding Learners on Educational Visits
Health and Safety
WMUTC First Aid and Medical Arrangements
WMUTC Administration of Medicines
Education of Students with Medical Needs
WMUTC Attendance
WMUTC Professional Conduct and Respect policy and appendices (the UTC Behaviour Policy)
WMUTC Visitors Procedure
WMUTC Extremism and Anti-Radicalisation Policy
E-Safety
WMUTC AUP for Staff, Students and Parents
WMUTC Use of Social Media by Staff
WMUTC Cover for Absent Colleagues
WMUTC LAC and Vulnerable Students Policy
WMUTC Anti-Bullying and Harassment
WMUTC SRE Policy
WMUTC SMSC Policy
WMUTC PSHCE Policy
WMUTC Assembly Policy

WMUTC PCR Appendix -Use of Reasonable Force
WMUTC PCR Appendix – Searching and Confiscation
WMUTC PRC Appendix – Drugs and Alcohol

Appendix 1

Flow Chart – What to do if you have safeguarding concerns about a WMUTC Learner

WMUTC staff member has a concern about a student's welfare



WMUTC staff will report a 'new incident' for the student on CPOMS and alert the safeguarding leads. WMUTC staff discusses concern with Designated Safeguarding Lead (Claire Gleeson) or DDSL (Simon Maxfield).
Or in the event of CPOMS being unavailable fill out referral form and pass to Claire Gleeson or Simon Maxfield as a matter of urgency. Forms are available in each staffroom, the general office, Sharepoint or DSL/DDSL



DSL/DDSL reviews reported incident and makes a decision about next steps.



DSL refers to LA Multi Agency Team (of the area that the child resides in) and in writing on the same day.



Decision made by Multi Agency Team within 24 hours of most appropriate action and DSL advised of outcome and in writing with 3 working days



Decision made to monitor concerns



No further child protection action although the DSL may consider engaging other agencies for support



Incident is reviewed and re-referred if appropriate or closed if circumstances improve.



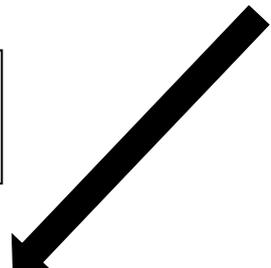
All outcomes will be recorded securely in CPOMS



No concern



DSL closes concern and records as 'near miss'.



Still Concerned? Use of Whistle Blowing Policy to raise concerns beyond the DSL.

Safeguarding Concern Form

CONFIDENTIAL - Not to be kept with curriculum records

Completed forms should be handed to CGL immediately. Hand to SMA if CGL is unavailable

Name of child	Tutor group
Member of staff raising concern	Relationship to the child
Who did you pass this information to?	On what date?

Nature of concern (Please include as much detailed information in this section as possible. Remember - of your information will inform the level of intervention initiated. If necessary, attach additional sheet)

Signature of member of staff raising concern	Date and time concern was raised
---	---

Details of all actions/ decisions taken in respect of this concern – To be completed by Designated Safeguarding Lead :-							
Number of Previous Records of Concern		Has child been the subject of a CAF/ Early Help Assessment		Is child known to other agencies		Previously on Child Protection Register	
						*Child protection Plan	
						*Child in Need Plan	
Action Taken				By who		Date & time Completed	
Outcome							
Action Taken				By who		Date & time Completed	
Outcome							
Action Taken				By who		Date & time Completed	
Outcome							
Action Taken						Date & time completed	
Outcome							
Name of Designated Safeguarding Lead				Signature			
Date							

Appendix 3

Body Map Guidance

Body Maps should be used to document and illustrate visible signs of harm and physical injuries.

Always use a black pen (never a pencil) and do not use correction fluid or any other eraser.

Do not remove clothing for the purpose of the examination unless the injury site is freely available because of treatment.

***At no time should an individual teacher/member of staff or school take photographic evidence of any injuries or marks to a child's person, the body map below should be used. Any concerns should be reported and recorded without delay to the appropriate safeguarding services, e.g. Social Care direct or child's social worker if already an open case to social care.**

When you notice an injury to a child, try to record the following information in respect of each mark identified e.g. red areas, swelling, bruising, cuts, lacerations and wounds, scalds and burns:

- Exact site of injury on the body, e.g. upper outer arm/left cheek.
- Size of injury - in appropriate centimetres or inches.
- Approximate shape of injury, e.g. round/square or straight line.
- Colour of injury - if more than one colour, say so.
- Is the skin broken?
- Is there any swelling at the site of the injury, or elsewhere?
- Is there a scab/any blistering/any bleeding?
- Is the injury clean or is there grit/fluff etc.?
- Is mobility restricted as a result of the injury?
- Does the site of the injury feel hot?
- Does the child feel hot?
- Does the child feel pain?
- Has the child's body shape changed/are they holding themselves differently?

Importantly the date and time of the recording must be stated as well as the name and designation of the person making the record. Add any further comments as required.

Ensure First Aid is provided where required and record

A copy of the body map should be kept on the child's concern/confidential file.

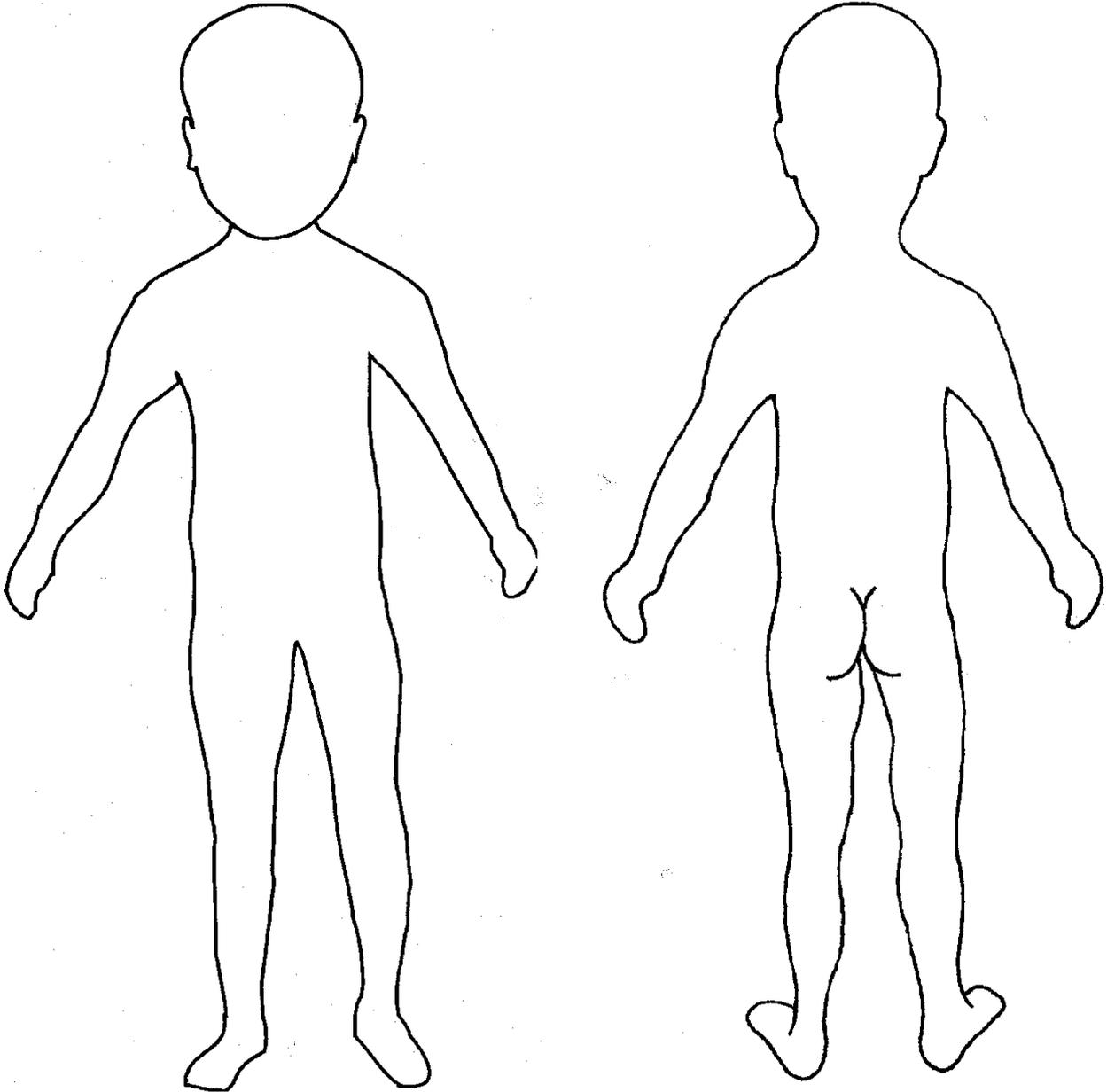
BODYMAP

(This must be completed at time of observation)

Name of Pupil: _____ Date of Birth: _____

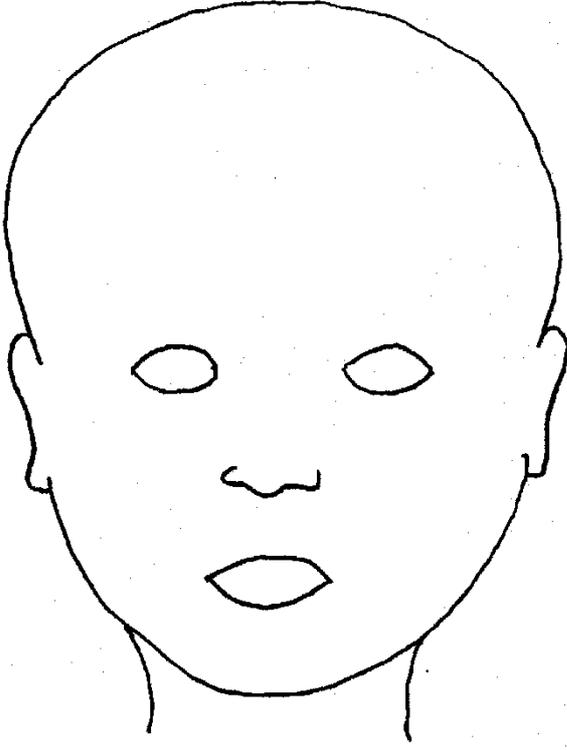
Name of Staff: _____ Job title: _____

Date and time of observation: _____

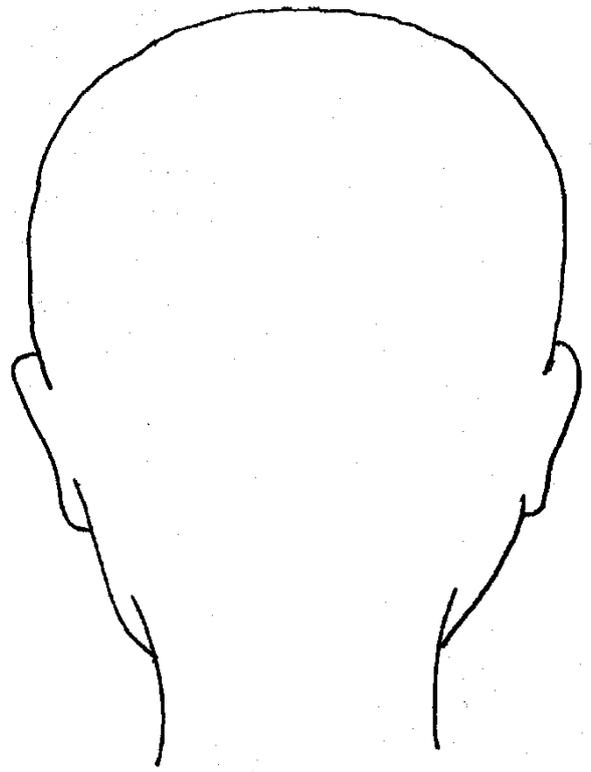


Name of pupil:

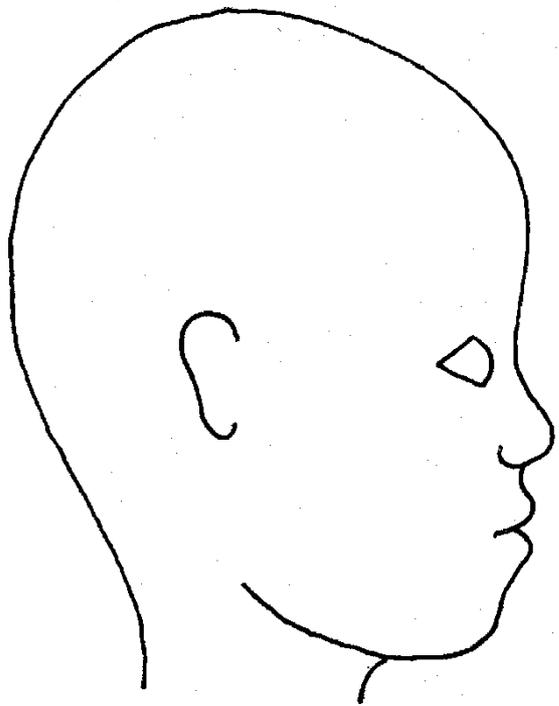
Date and time of observation:



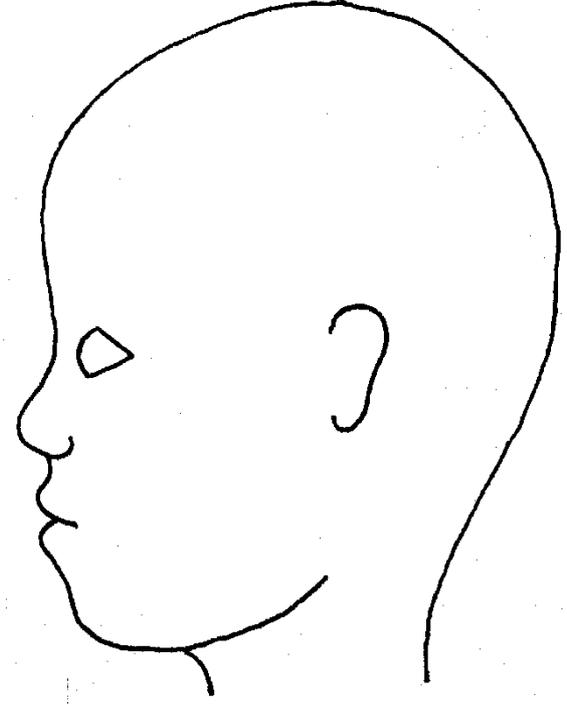
FRONT



BACK



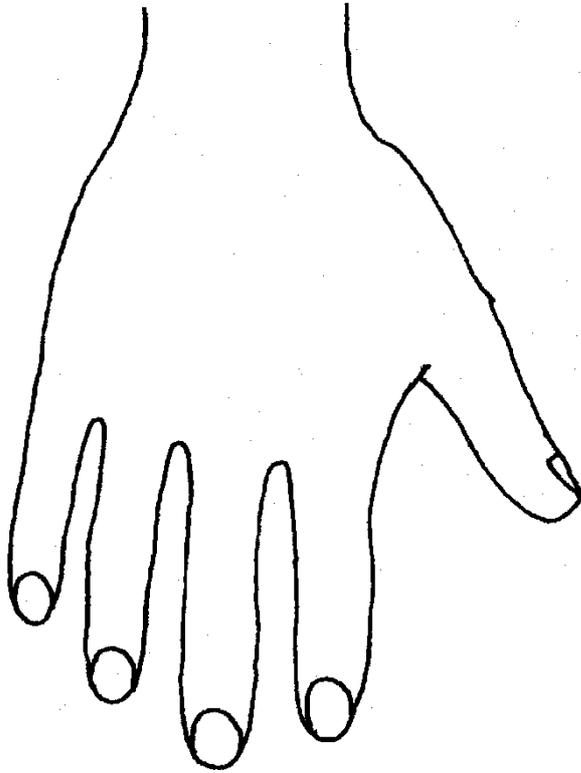
RIGHT



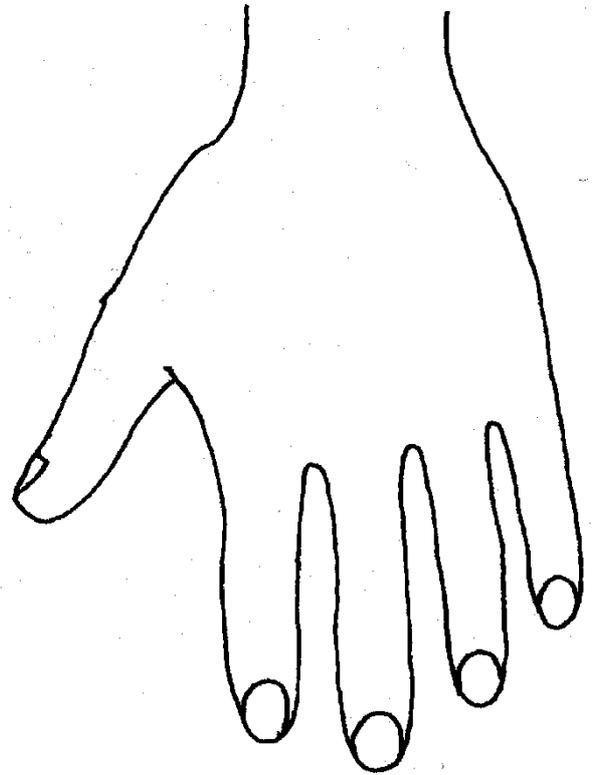
LEFT

Name of pupil:

Date and time of
observation:



R



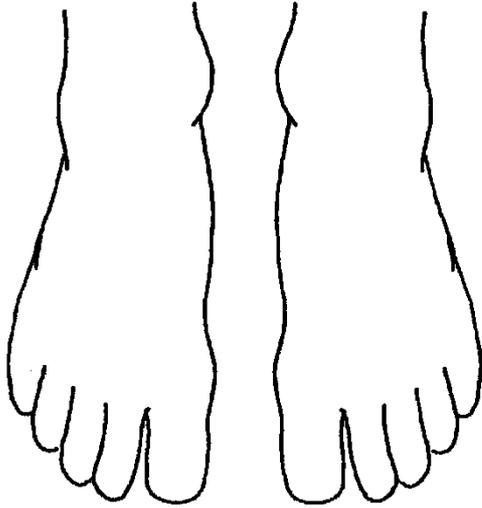
L

BACK

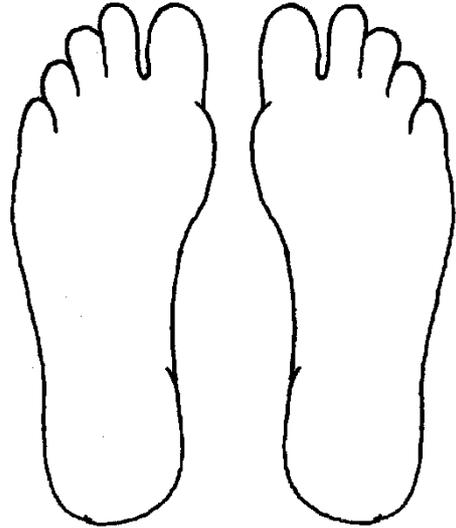


Name of Pupil: _____

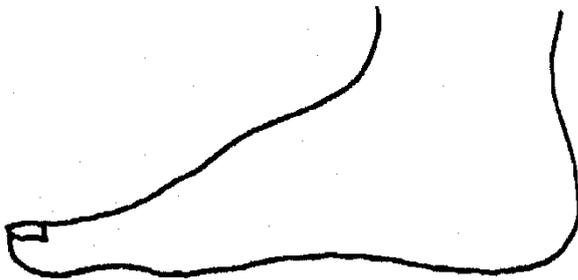
Date and time of observation: _____



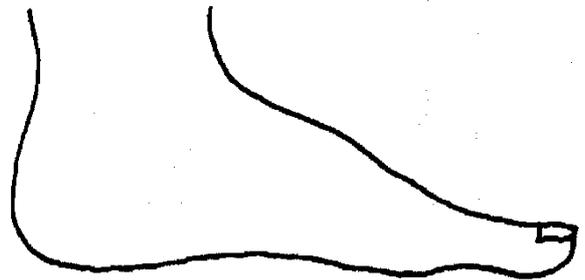
R TOP L



R BOTTOM L

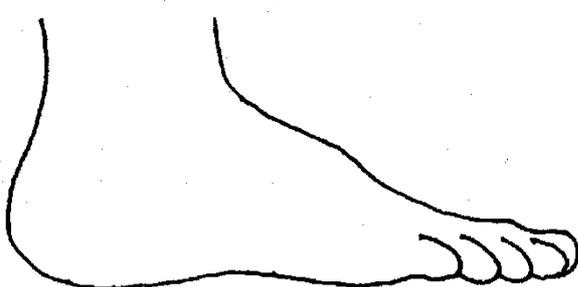


R

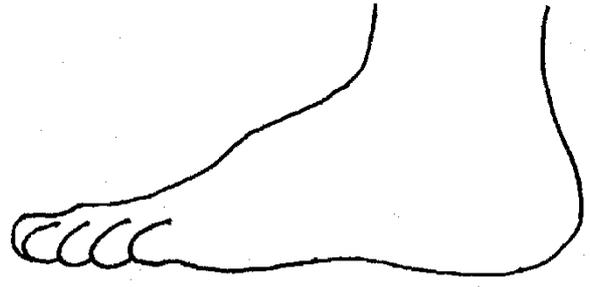


L

INNER



R



L

OUTER

Printed Name,
Signature and Job
title of staff:

Appendix 4

GUIDANCE ON HANDLING A DISCLOSURE FROM A CHILD

What should you do if a child comes to you and tells you that they are being abused? It's normal to feel overwhelmed and confused in this situation. Child abuse is a difficult subject that can be hard to accept and even harder to talk about. Children who are abused are often threatened by the perpetrators to keep the abuse a secret. Thus, telling an adult takes a great amount of courage. Children have to grapple with a lot of issues, including the fear that no one will believe them. So, care must be taken to remain calm and to show support to the child throughout the disclosure phase. The following guidelines will help lessen the risk of causing more trauma to the child and/or compromising a criminal investigation during the disclosure phase.

Receive:

Listen to what is being said without displaying shock or disbelief. A common reaction to news as unpleasant and shocking as child abuse is denial. However, if you display denial to a child, or show shock or disgust at what they are saying, the child may be afraid to continue and will shut down. Accept what is being said without judgement. Take it seriously.

Reassure:

Reassure the child, but only so far as is honest and reliable. Don't make promises that you can't be sure to keep, e.g. "everything will be all right now". Reassure the child that they did nothing wrong and that you take what is said seriously.

Don't promise confidentiality – never agree to keep secrets. You have a duty to report your concerns.

Tell the child that you will need to tell some people, but only those whose job it is to protect children.

Acknowledge how difficult it must have been to talk. It takes a lot for a child to come forward about abuse.

React:

Listen quietly, carefully and patiently. Do not assume anything – don't speculate or jump to conclusions.

Do not investigate, interrogate or decide if the child is telling the truth. Remember that an allegation of child abuse may lead to a criminal investigation, so don't do anything that may jeopardise a police investigation. Let the child explain to you in his or her own words what happened, but don't ask leading questions.

Do ask open questions like "Is there anything else that you want to tell me?"

Communicate with the child in a way that is appropriate to their age, understanding and preference.

This is especially important for children with disabilities and for children whose preferred language is not English.

Do not ask the child to repeat what they have told you to another member of staff. Explain what you have to do next and whom you have to talk to.

Refer directly to the named designated person, Simon Maxfield.
Do not discuss the case with anyone outside the child protection team.

Record:

Make some very brief notes at the time and write them up in detail as soon as possible.
Do not destroy your original notes in case they are required by Court.
Record the date, time, place, words used by the child and how the child appeared to you – be specific. Record the actual words used; including any swear words or slang.
Record statements and observable things, not your interpretations or assumptions – keep it factual.

Appendix 5

Safeguarding and Child Protection Further Guidance and Contact Information

WMUTC Designated Persons for Child Protection
Designated Safeguarding Lead for Child Protection: Leader of Student Welfare and Safeguarding (Claire Gleeson) 01902 872180; claire.gleeson@wmutc.co.uk
Designated Safeguarding Lead (Deputy) for Child Protection: Vice Principal (Simon Maxfield) 01902 872180; simon.maxfield@wmutc.co.uk
Chair of Governors: Kerrie Jones 01902 872180; Kerrie.jones@wmutc.co.uk
Designated Safeguarding Governor: Kerrie Jones 01902 872180; Kerrie.jones@wmutc.co.uk
Designated Teacher for LAC: Pip Shaw 01902 872180 philippa.shaw@wmutc.co.uk
E-Safety Lead Teacher: Simon Maxfield 01902 872180; simon.maxfield@wmutc.co.uk
Local Authority Designated Officer: Paul Cooper 01902 550661; paul.cooper@wolverhampton.gcsx.gov.uk (Secure email) Paul.Cooper@wolverhampton.gov.uk (non-secure email)
Multi Agency Service Team (Wolverhampton): 01902 555392 or 01902 552999(out of hours); https://www.wolverhamptonsafeguarding.org.uk/contact-us
PREVENT (Channel): 01902 551214; PC P.Lally; PC P.Sandhu; Safer@wolverhampton.gov.uk
Wolverhampton Virtual Head (looked after children): Darren Martindale 01902 551039 darren.martindale@wolverhampton.gov.uk
Wolverhampton CSE Lead: Sandeep Gill 01902 550523; Sandeep.gill@wolverhampton.gov.uk

Wolverhampton Safeguarding Children Board

Priory Green Building
Whitburn Close
Pendeford
Wolverhampton
WV9 5NJ.

Tel: 01902 550477

Fax: 01902 553048

Email: wscb@wolverhampton.gov.uk

The Head of Service (Safeguarding Children and Young People) is Dawn Williams.
The Local Authority Designated Officer is Paul Cooper.

Emergency

If a child is in immediate danger or left alone, you should contact the police or an Ambulance, when doing so, notify them that your concerns relate to a possible Child Protection issue.

Non Emergency

If there is no immediate danger or you need advice or information, you should call the Duty and Assessment Team based at Wolverhampton Civic Centre: **01902 555392**.

Outside office hours, contact our emergency service on **01902 552999**.

Walsall Safeguarding Children Board

The Hollies
Lichfield Road
Walsall
WS4 2DH
Telephone 01922 659520
Fax 01922 648258

Email wscb@walsall.gov.uk Birmingham Safeguarding Children's Board

Staffordshire Safeguarding Children Board

Wedgwood Building
Tipping Street
Stafford
ST16 2DH

Email: www.staffsscb.org.uk Office email address: sscb.admin@staffordshire.gov.uk Office
Administration Contact Number: 01785 277151
Training Administration contact number: 01785 854579 (see below for address)

SSCB Manager

Carrie Wain

Telephone: 01785 277151
Email: carrie.wain@staffordshire.gov.uk

SSCB Development Officer

Lynne Milligan Telephone: 01785 854572

Email: lynne.milligan@staffordshire.gov.uk

Telford & Wrekin Safeguarding Children Board

Safeguarding Advisory Service, 30 West Road, Telford, TF1 2BB | lscb@telford.gov.uk | 01952 385678

Sandwell SCB

Main Unit Contact No: 0121 569 4800 **Email:** lscb_sandwell@sandwell.gov.uk

Dudley Safeguarding

Council House
Priory Road
Dudley
DY1 1HF

0300 555 2345

Birmingham Safeguarding Children's Board

Room B54

Council House Extension

Margaret Street Birmingham B3 3BU

0121 464 2612

Additional Advice/Information

Guidance for professionals can be obtained from both of the organisations below:

- call Childline on 08001111
- call the NSPCC Helpline on 0808 800 5000

Appendix 6:

Allegations of abuse against staff and adults

Further guidance is contained within Safeguarding and Allegations of Abuse Policy

Protecting UTC staff against allegations of abuse

All staff should seek to keep personal contact with children under review and seek to minimise the risk of any situation arising in which misunderstandings can occur. Further guidance can be found in the DfE publication that is issued to all staff and signed for 'Safer Working Practices for Adults and Young People in Education Settings 2015. The following sensible precautions can be taken when working alone with children:

- work in a room where there is a glass panel in the door or leave the door open;
- make sure that other adults visit the room occasionally;
- avoid working in isolation with children unless thought has been given to safeguards;
- do not give out personal information or mobile phone numbers or private e-mail addresses;
- do not give learners lifts home in your car;
- do not arrange to meet learners outside of UTC hours;
- do not chat to learners on social websites or befriend them;
- do not put personal information or images on social net-working sites that can be accessed/viewed by learners or their parents/carers.

Under the Sexual Offences Act 2003 it is a criminal offence for anyone working in an education setting to have a sexual relationship with a student even when the learner is over the age of consent.

Physical Intervention

Any use of physical force or restraint against learners will be carried out and documented in accordance with the WMUTC PCR Appendix – Use of Reasonable Force. If it is necessary to use physical action to prevent a child from injury to themselves or others parents/carers will be informed.

Learners will not be punished by any form of physical contact or other degrading treatment.

Procedures for dealing with allegations of abuse against WMUTC staff/ adults

Children can be the victims of abuse by those who work with them in any setting. All allegations of abuse of children carried out by any member of staff or volunteer should therefore be taken seriously.

The 'safeguarding and allegations of abuse policy' details the UTCs approach to such allegations

Staff recruitment, supervision and training

When recruiting new staff, the UTC follows the guidance given in the UTCs 'Safeguarding and Safer Recruiting Appendix', and the relevant Local Authority Guidelines, (Wolverhampton in the first instance). The UTC ensures that enhanced DBS checks are undertaken, that references are taken up and obtained and that qualifications are verified. All members of the Senior Leadership Team and the Chair of Governors and at least one other governor will have up to date safer recruitment training. At least one member of each recruitment panel will have up to date Safer Recruitment training.

Business partners will not work with learners without another DBS checked adult in attendance.

Newly appointed staff will have initial training in child protection as part of their induction programme. They will be made aware of the Local Authority Safeguarding Children Board procedures as part of that induction programme, and be given a copy of the UTC's Safeguarding Policies and procedures, and "What to do if you are worried a child is being abused".

All staff and governors (invited) will also attend annual single agency safeguarding training delivered by the DSL and deputies. Training for the DSL and deputies will be by way of a 2-year renewal of the multi-agency training and annual updates delivered by the WSCB. Training for staff, governors and volunteers will include an annual update and regular short updates, delivered by staff, for staff on differing aspects of safeguarding. These training 'bites' will be coordinated and arranged by the DSL.

The Designated Safeguarding Lead and their deputy will attend multi agency training through a relevant Local Authority Safeguarding Children Board Training Programme. This training will be renewed every two years.