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Appendix A - Child and Vulnerable Adult Protection

Definitions

The key terms in this document are defined as:

- **Child:** Any individual under 18. For safeguarding purposes, this also includes learners aged 19–25 with an Education, Health and Care Plan (EHCP).
- **Vulnerable Adult:** An adult with care and support needs who is at risk of abuse or neglect and unable to protect themselves due to those needs.

All Learners: The College is committed to supporting and safeguarding all learners. Even where concerns do not meet thresholds for referral to external services, support must still be provided internally where appropriate.

All staff must be alert to potential signs of harm and understand that abuse can occur:

- In or outside the College
- At home or in the community
- Online or offline
- By adults or peers

Abuse and neglect often involve overlapping issues. Staff should use professional curiosity and be proactive in spotting signs of harm.

Indicators of abuse and neglect

Types of Abuse

All staff must be familiar with the different types of abuse, understand that abuse can take place in person or online, and know that it can be carried out by adults or by other children (child-on-child abuse). Abuse often involves more than one type and can occur at home, in education settings, or within the wider community.

Physical Abuse

This involves deliberately causing physical harm to a child or young person.

Examples include:

- Hitting, slapping, punching or kicking
- Burning or scalding
- Shaking or throwing
- Poisoning
- Drowning or suffocating
- Using excessive force or rough handling
- Fabricating or inducing illness (e.g. making a child appear ill by administering substances or interfering with medical treatment)

Signs to look for:

- Unexplained injuries or frequent bruising
- Injuries in unusual places (e.g. thighs, back, genitals)
- Children flinching when approached
- Wearing long sleeves in hot weather to cover injuries

Emotional Abuse

This is persistent maltreatment that damages a child's emotional wellbeing or development. It may occur on its own or alongside other types of abuse.

Examples include:

- Constant criticism, rejection, or belittling
- Not allowing the child to express themselves
- Overprotection or preventing age-appropriate independence
- Exposure to domestic abuse or violence
- Intimidation, threats, or scapegoating
- Bullying (including cyberbullying)

Signs to look for:

- Low self-esteem, anxiety, or depression
- Withdrawn or overly compliant behaviour
- Sudden speech disorders or developmental delays
- Difficulty forming relationships with peers or adults

Sexual Abuse

This includes any sexual activity with a child, whether they are aware of what is happening or not. It may involve physical contact or be non-contact, such as exposing a child to sexual content or encouraging sexually inappropriate behaviour.

Examples include:

- Touching a child in a sexual way
- Forcing or encouraging sexual acts
- Rape or sexual assault
- Making or sharing sexual images or videos
- Grooming – online or in person
- Exploitation through social media, messaging apps, or gaming platforms
- Child-on-child abuse (e.g. coercive sexual relationships or harassment between learners)

Signs to look for:

- Inappropriate sexual knowledge or behaviour for their age
- Fear of being alone with certain people
- Pain or injuries in private areas

- Sudden withdrawal or fearfulness
- Avoidance of changing clothes or medical examinations

Neglect

Neglect is the persistent failure to meet a child's basic physical, emotional, or medical needs, which harms their health or development.

Examples include:

- Not providing enough food, clean clothing, or warmth
- Leaving a child unsupervised or exposed to danger
- Failing to get medical help when needed
- Ignoring emotional needs
- Excluding a child from the home or abandoning them
- Allowing poor hygiene or unsafe living conditions
- Substance misuse during pregnancy that affects the child's development

Signs to look for:

- Poor hygiene or consistently dirty clothing
- Extreme hunger or stealing food
- Untreated medical conditions
- Frequent absences or lateness
- Fatigue, listlessness, or falling asleep in class

All staff have a duty to report any concerns or suspicions about abuse immediately. Even if you're unsure, it is better to share a concern than to overlook something potentially serious. Contact an Advanced Safeguarding Practitioner, Designated Safeguarding Lead or Deputy Designated Safeguarding Lead.

Safeguarding issues

Safeguarding is not just about identifying signs of abuse at home — it also includes recognising the wide range of risks that can affect learners inside and outside of college. All staff, regardless of their role, must understand that any child or vulnerable adult can be at risk, and must know how to respond to concerns.

Below are some of the most common safeguarding issues in education settings.

Child-on-Child Abuse

Abuse can be carried out by other children or young people. This is known as child-on-child abuse and can happen in person or online. It may be hidden or downplayed, especially if the individuals involved see it as "banter" or part of a relationship.

Types of child-on-child abuse include:

- Bullying – including cyberbullying (e.g. abusive messages or threats on social media or via group chats), and prejudice-based bullying (e.g. related to race, sexuality, gender identity, or disability)
- Intimate partner abuse between young people (e.g. controlling behaviour, threats, violence in relationships)
- Physical assault such as hitting, kicking, or other violence, including threats online
- Sexual violence or harassment – this could include unwanted touching, comments, sharing sexual jokes, or making threats
- Sharing of sexual images or videos without consent – often referred to as “sexting” or “youth-produced sexual imagery.” It may happen consensually at first, but can quickly become abusive
- Initiation rituals or hazing – where students are forced to go through humiliating or harmful tasks to join a group or team

Staff must never dismiss harmful behaviours as ‘just part of growing up’. All concerns should be passed on to an Advanced Safeguarding Practitioner, Designated Safeguarding Lead or Deputy Designated Safeguarding Lead.

Types of Exploitation

Child Criminal Exploitation (CCE)

CCE occurs when young people are manipulated or forced into criminal activity, often by older individuals or organised groups. This can include:

- County lines – transporting or selling drugs between towns or counties
- Carrying weapons or money
- Shoplifting, theft, or vandalism
- Committing violence or intimidation for others’ benefit

Children may not always realise they are being exploited and may appear to be making a choice, when they are being controlled, threatened, or coerced.

Signs of CCE might include:

- Being in possession of expensive items they can't explain
- Going missing or being absent without reason
- Changes in friendship groups or spending time with older individuals
- Carrying weapons
- Seeming anxious, withdrawn, or fearful

Child Sexual Exploitation (CSE)

CSE involves a child or young person being groomed or pressured into sexual activity, often in return for things like attention, affection, gifts, money, or drugs. It can happen in person or online and sometimes looks like a romantic relationship from the outside.

Key points:

- It can involve strangers, acquaintances, or even peers
- The child may not understand they are being abused
- Grooming can take place over days, weeks, or months

Signs might include:

- Inappropriate or sexualised behaviour or language
- Sudden changes in mood or appearance
- Unexplained money, clothing, or gifts
- Secretive behaviour or sudden withdrawal from others

Domestic Abuse

Domestic abuse doesn't only affect adults — children can be victims too, whether they witness violence or are directly harmed. Abuse may be emotional, physical, sexual, or financial, and it can happen in a family home or a young person's own relationship.

Warning signs may include:

- Fearfulness or anxiety
- Difficulty concentrating or sleeping
- Unexplained injuries
- Reluctance to go home

Abuse may occur once or be part of a long-term pattern. It can have serious, lasting effects on a child's health, behaviour, and learning.

Female Genital Mutilation (FGM)

FGM involves partial or total removal of external female genitalia for non-medical reasons. It is illegal in the UK and considered a serious form of child abuse.

Key facts:

- Usually carried out on girls between birth and age 15
- Often performed abroad but may also happen in the UK
- There is no medical reason or religious requirement for FGM
- FGM can cause lifelong physical and psychological harm

Staff responsibility:

If a teacher discovers that FGM has been carried out on a girl under 18, they have a legal duty to report it to the police immediately and must also inform the Designated Safeguarding Lead (DSL). Other staff should also report concerns immediately to the DSL.

Warning signs might include:

- A girl talking about a special ceremony or trip abroad
- Avoidance of medical exams or PE
- Difficulty sitting or walking
- Sudden withdrawal or distress

Mental Health

Poor mental health can sometimes be a symptom of abuse, neglect, or exploitation, though it can also be a separate issue requiring support.

Staff are not expected to diagnose mental health conditions, but you should:

- Be alert to changes in behaviour, mood, or academic performance
- Look for signs like self-harm, withdrawal, aggression, or excessive worry
- Report concerns promptly to an Advanced Safeguarding Practitioner, Designated Safeguarding Lead or Deputy Designated Safeguarding Lead
- Do not assume someone else will report it. Mental health concerns may be the first visible sign that something is wrong.

Serious Violence

Some young people may become involved in or at risk of violent crime. This often links to exploitation or gang activity.

Warning signs include:

- Unexplained injuries or frequent fights
- Carrying weapons or being fearful of being harmed
- Association with gangs or older individuals
- Changes in behaviour, attendance, or appearance
- Possession of unexplained money or new belongings

If you have any concerns about a learner – whether you're sure it's a safeguarding issue – always speak to an Advanced Safeguarding Practitioner, Designated Safeguarding Lead or Deputy Designated Safeguarding Lead. You do not need proof. Sharing a concern could prevent serious harm and protect a child or vulnerable adult from abuse.

Keeping Children Safe in Education 2025

Annex B contains important additional information about specific forms abuse and safeguarding issues.

College leaders and those staff who work directly with children should read Annex B.

[Keeping children safe in education 2025](#)

Further guidance on the above is available, and must be followed, in other appendices of the Child Protection and Safeguarding Policy.

Safeguarding team Contact details

The Designated Safeguarding Lead (DSL), the Deputy Designated Safeguarding Lead (DDSL) Managers for Student Experience and Wellbeing and all Advanced Safeguarding Practitioners are detailed below.

If the Advanced Safeguarding Practitioner (ASP) for a site is unavailable, any of the other ASPs can provide guidance on Teams.

Nominated Governor for safeguarding	Gary Wright Contact via Sarah Thompson (Clerk to the Governors) - Email sarah.thompson@the-etc.ac.uk - Telephone – 01642 865415
Senior Board Lead responsible for college safeguarding arrangements	Grant Glendenning Group Principal and Chief Executive Officer Contact via Cath Turner (Executive Team and Secretariat Manager) - Email Catherine.turner@the-etc.ac.uk - Telephone – 01642 865401
Senior Leadership Team member with oversight of college safeguarding arrangements (Chair of the College Safeguarding Management Group)	Jason Faulkner Deputy Chief Executive Officer Contact via Helen Carter-Smith (Senior Administrator) - Email – helen.carter-smith@cleveland.ac.uk - Telephone – 01642 777111
Designated Lead for Safeguarding	Alys Tregear Director of Student Experience and Wellbeing - Email alys.tregear@the-etc.ac.uk - Tel: 01642 865400
Student Experience and Wellbeing Manager - Safeguarding Deputy Designated Lead for Safeguarding	Helen Challinor - Email – helen.challinor@the-etc.ac.uk - Telephone - M: 07856 902970
Student Experience and Wellbeing Manager – Personal Development Lead for Safeguarding – Bede and Innersummit	Rachel O’Riordan - Email – rachel.oriordan@the-etc.ac.uk - Telephone – 07590 864913
Student Experience and Wellbeing Manager – Student Finance and Bursary Lead for Safeguarding – SRC & NETA	Emma Brown - Email – emma.brown@the-etc.ac.uk - Telephone – 07590 864901

Safeguarding Practitioner – Stockton Riverside College	Ferzana Ahmed Advanced Safeguarding Practitioner - Email – Ferzana.Ahmed@stockton.ac.uk - T: 01642 865530 M: 07970 982324 Katie Todd Advanced Safeguarding Practitioner - Email – katie.todd@stockton.ac.uk - Telephone – 07590 864913 Lesley Duffy Advanced Safeguarding and Welfare Practitioner - Email - lesley.duffy@stockton.ac.uk - Telephone – 07856902967
Advanced Safeguarding Practitioner - Redcar and Cleveland College	Tracy Williams Advanced Safeguarding Practitioner - Email – tracy.williams@cleveland.ac.uk - Telephone – 01642 777230 / 07702 515472
Advanced Safeguarding Practitioner – Bede Sixth Form College	Christine Cook Advanced Safeguarding and Welfare Practitioner - Email – christine.cook2@stockton.ac.uk - Telephone – 01642 631419 / 07968107338
Safeguarding – NETA Training Group	Katie Todd Advanced Safeguarding Practitioner - Email – katie.todd@stockton.ac.uk - Telephone – 07590 864913
Cross College Lead – Learners with Education and Health Care Plans and/or High Needs	Alexa Lang High Needs Manager - Email – alexa.lang@the-etc.ac.uk - T: 01642 865555 M: 07436 795893

When a Learner Discloses Abuse — Guidance for Staff

If a learner shares concerns or abuse with you, here's how to respond:

1. Listen and Stay Calm

- Speak softly and remain composed—don't show shock or embarrassment.
- Let the learner share in their own words; don't ask leading questions like "Did he hit you?"
- Avoid making promises of confidentiality but explain that you must share the information with an Advanced Safeguarding Practitioner, Designated Safeguarding Lead, or Deputy Designated Safeguarding Lead and that they will be kept updated.
- Reassure them that you take their disclosure seriously.

2. Do Not Investigate or Medical Examine

- Do not examine any injuries.
- If the disclosure mentions sexual images, do not ask to view or request them—simply report this to the Safeguarding Team.

3. Record the Details

As soon as possible, write down what the learner said, using their exact words if you can. Include:

- The time, date, and location of the disclosure
- Any direct quotes
- Factual observations (e.g. tears, hesitation)
- Give the record to a Safeguarding Team member (ASP, DSL, or Deputy DSL)—do not keep a copy yourself.

4. Report Immediately

- Contact an Advanced Safeguarding Practitioner (ASP), the Designated Safeguarding Lead (DSL), or a Deputy DSL right away. If you're unsure about being alone with the learner, ask another trusted staff member to assist.
- Do not discuss the disclosure with anyone else—not with the learner, other staff, or family members.

5. If No Safeguarding Team Member is Available

Contact the appropriate site reception or duty manager:

- Stockton Riverside College: Dial 0 internally
- Bede Sixth Form College: Dial 2001 internally
- Redcar & Cleveland College: Dial 0 internally
- NETA Reception: 01642 616936

Duty Managers:

- SRC Duty: 07970 844351 (Tue–Wed evenings, term time)
- RCC Duty: 07703 733330 (Mon–Thu evenings, term time)

6. Out-of-Hours or Emergency Situations

If the disclosure occurs outside college hours and there is an immediate risk, take all reasonable steps to ensure safety—this may include contacting Social Services, the Emergency Duty Team, or the Police (see local contact table below).

7. Later Follow-Up and Multi-Agency Action

The Advanced Safeguarding Practitioner, Designated Safeguarding Lead, or Deputy Designated Safeguarding Lead will:

- Assess whether to offer internal support, refer to Early Help, or make a statutory (SAFER) referral to Children’s or Adult Social Care or the Police.
- Talk with the learner and, if appropriate, their family—unless this could increase risk.
- Collect full details needed for referral (full address, date of birth, other known professionals involved, special needs, etc.) and record whether consent was given.
- Submit and confirm a written referral using the Safeguarding Referral form (available from Tees Safeguarding Children Partnerships).
- Keep a secure, dated record of all actions, advice, and outcomes (e.g. in CPOMS).
- Inform whether the referral was accepted and participate in any follow-up meetings or plans.
- If not accepted, revisit the decision with senior safeguarding leads and consider alternatives, like Early Help.

Support, Confidentiality, and Self-Care

- Hearing a disclosure can be distressing. If you need it, discuss feelings with HR or your line manager.
- Only share personal information on a need-to-know basis.
- Never assume others will report—safeguarding is everyone’s responsibility.

Why This Matters

Prompt and structured action ensures learner safety and compliance with legal frameworks (e.g. ‘Keeping Children Safe in Education’, Children Acts).

It protects learners, supports staff, and ensures consistent, professional handling of sensitive issues.

Local Children’s Services Contact Details

Children’s Services	Office	Out of Hours	Email
Hartlepool	01429 284284 01642 130080	01642 524552	childrenshub@hartlepool.gov.uk
Middlesbrough	01642 726004	01642 524552	MiddlesbroughMACH@middlesbrough.gov.uk
Redcar & Cleveland	01642 130700	01642 524552	RedcarMACH@redcar-cleveland.gov.uk
Stockton-on-Tees	01642 130080 01429284284	01642 524552	childrenshub@hartlepool.gov.uk

Appendix B - Children and Vulnerable Adults Absent from Education

Purpose and content

The purpose of this appendix of the College Safeguarding and Child Protection Policy is to provide a clear set of guidelines to staff regarding the actions they must take if a child or young person stops attending College during their course without a legitimate reason; or if a vulnerable adult goes missing and the circumstances give cause for concern.

Definitions

- **Child:** Any individual under 18. For safeguarding purposes, this also includes learners aged 19–25 with an Education, Health and Care Plan (EHCP).
- **Vulnerable Adult:** An adult with care and support needs who is at risk of abuse or neglect and unable to protect themselves due to those needs.
- **All Learners:** The College is committed to supporting and safeguarding all learners. Even where concerns do not meet thresholds for referral to external services, support must still be provided internally where appropriate.

Children who are absent from education

Children being absent from education for prolonged periods and/or on repeat occasions can act as a vital warning sign to a range of safeguarding issues including neglect, child sexual and child criminal exploitation - particularly county lines.

This may include being victims of abuse and neglect, sexual abuse including exploitation or radicalisation, or it may be a sign of child criminal exploitation including involvement in county lines. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation, so called 'honour-based' abuse or risk of forced marriage.

Children who are missing from education are also at risk of becoming Not in Education, Employment or Training, (NEET) and experiencing reduced life chances, including mental and physical health difficulties in later life.

The College is committed to the protection of the most vulnerable and all staff must ensure action is taken when a learner's attendance record is poor and urgent action must be taken if a learner under the age of 18 or a learner aged 25 or under who is in receipt of an EHCP stops attending College during their course without a legitimate reason. Action must also be taken if a vulnerable adult goes missing and the circumstances give cause for concern.

The risks are significantly higher for children who are absent from education on repeat occasions and all staff must act to help identify the risk of abuse and neglect, including sexual exploitation, and to help prevent the risks of learners going missing in the future.

Early intervention is essential to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child going missing in future. It is important that staff are aware of the College's unauthorised absence procedures, which are outlined in the Etc Attendance Strategy.

Legitimate reasons for non-attendance

For the purpose of this guidance legitimate reasons include:

- Authorised absences where there are no reasons to suspect abuse or neglect may be a contributory factor; and the parent/carer and any professionals/schools involved with the learner are fully aware of the absence
- Withdrawals due to:
 - Progression to employment; or alternative education or training provision
 - Moving out of the area or ill health where there are no reasons to suspect abuse or neglect may be a contributory factor; and the parent/carer and any professionals/schools involved with the learner are fully aware of the withdrawal
 - Stage 3 & 4 behaviour management issues; the Student Experience and Wellbeing Team must be informed for a learner under the age of 18 so they can alert external agencies as appropriate, the 14-16 Coordinator (at Redcar & Cleveland College or Stockton Riverside College) must be informed (and involved) for a learner who is under the age of 16 at the start of the academic year and the Group High Needs Manager must also be informed (and involved) for a learner aged 25 or under, who is in receipt of an EHCP and/or in receipt of high needs funding so they can liaise with the local authority.
 - The outcome of a safeguarding risk assessment panel.

Actions to be taken in response to non-legitimate absences

- All curriculum staff must monitor attendance and address it at the earliest opportunity with the learner, and their parent/carer (including the Local Authority as corporate parent for a Child In Our Care) or any professionals/schools involved, if it starts to decline
- Ongoing concerns about a learner's attendance must be referred by curriculum staff to the following managers:

Stockton Riverside College Bede Sixth Form College NETA Training Group	Relevant Curriculum manager 14-16 Coordinator (if the learner is Y10/11 school age) High Needs Manager (if the learner is aged 25 or under and in receipt of an EHCP and/or high needs funding)
Redcar & Cleveland College	Relevant Curriculum manager 14-16 Coordinator (if the learner is Y10/11 school age) Special Educational Needs Coordinator (if the learner is under the age of 25 and in receipt of an EHCP and/or high needs funding)

- Curriculum Managers, Heads of Department and Assistant Head of Sixth Form at Bede must ensure significant concerns are followed up by contacting parents/ carers (inc Local Authority corporate parent for a Child In Our Care) (e.g. unable to contact a learner who is under the aged 19 or under).
- If, after following absence procedures, the learner has not been contacted, the Student Experience and Wellbeing Team will be informed.
- The Student Experience and Wellbeing Team will use all reasonable means to contact the learner and their parent carer, or any professional/s involved, to determine the reason/s behind the lack of attendance and agree a plan of action to improve the learner's attendance or to get a child missing education (CME) back into education. Means of contact will include home visits where appropriate or where other methods have failed.
- The Student Experience and Wellbeing Team will alert the appropriate service in the relevant local authority, if they are unable to make contact and will also immediately refer any information that indicates the child, or adult is at significant risk of abuse or neglect following the referral routes outlined in the Safeguarding Policy.
- An urgent referral is required if there is any suspicion the absence is connected to radicalisation or terrorism (also see Appendix G on Prevent).
- The 14-16 Coordinator will undertake similar actions to those outlined in bullets 4 & 5 (above) for an Y10/Y11 learner, liaising closely with the appropriate school for learners on roll with the school and the Local Authority for electively home educated learners. These staff will inform the Local Authority immediately if an Y10/Y11 electively home educated learner is withdrawn or missing from College. The High Needs Manager and Special Educational Needs Coordinator will undertake similar actions to those outlined in bullets 4 & 5 (above) for a learner aged 25 or under who is in receipt of an EHCP and/or high needs funding, liaising closely with the Local Authority and other professionals as appropriate.

Appendix C - So-called 'Honour' Based Abuse Including Female Genital Mutilation and Forced Marriage

Purpose and content

The purpose of this appendix of the College Safeguarding Policy is to provide a clear set of guidelines to staff regarding the actions they must take if they become aware that so-called 'honour' based abuse is taking place or female genital mutilation has been performed, or is planned to be performed, or if some-one is at risk of forced marriage.

Definitions

The key terms in this document are defined as:

- **So-called 'Honour' Based Abuse:** (HBA) encompasses incidents or crimes, which have been committed to protect or defend the honour of the family and/or the community, including forced marriage, and practices such as breast ironing and female genital mutilation (FGM).
- **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 is a form of child abuse, for those aged under 18, with long-lasting harmful consequences.
- **Forced Marriage:** Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter a marriage. Threats can be physical, emotional or psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some perpetrators use perceived cultural practices to coerce a person into marriage. Colleges can play an important role in safeguarding children from forced marriage.
- In addition, **since February 2023 it has also been a crime to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday**, even if violence threats or another form of coercion are not used. As with the existing forced marriage law, this applies to non-binding, unofficial 'marriages' as well as legal marriages.

All forms of HBA are abuse (regardless of the motivation) and must be handled and escalated as such.

Female Genital Mutilation

Department for Education (DfE) September 2025: Keeping Children Safe in Education; statutory guidance for schools and colleges outlines the **statutory duty on teachers, introduced in October 2015, under Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) to report to the police** where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out

on a girl under 18. The guidance also outlines that those teachers failing to report such cases will face disciplinary sanctions.

[FGM Fact Sheet](#)

[Mandatory reporting of female genital mutilation -Guide](#)

Actions to be taken in response to FGM

Where there is a risk to life or likelihood of serious immediate harm, professionals should report the case immediately to police, including dialling 999 if appropriate.

- All staff must maintain an attitude of ‘it could happen here’ and be vigilant. Staff must respond immediately if there is any indication that HBA is taking place or FGM has been performed on any female, or if it appears that there is a risk of FGM being planned. This includes learners, staff, volunteers, learners on placements and any other female in the College or wider community.
- There are **no circumstances** in which any College staff member should examine a female.
- **Curriculum delivery staff (e.g. teachers and lecturers) must report the information they have become aware of directly to the Police if the female is under 18.** All other staff should report information of FGM to the College Designated Safeguarding Lead (DSL) or Deputy DSL in their absence following the referral routes as outlined in Making a referral Appendix J of the Safeguarding Policy.
- It is recommended that a report to police is made orally by calling 101, the single non-emergency number. The reference number for the call should be included in written records which comprehensively document all discussions held and subsequent decisions made. The case should then be reported to the College Designated Safeguarding Lead (DSL) or Deputy DSL in their absence, following the referral routes as outlined in Making a referral Appendix J, of the Safeguarding Policy. The DSL/Deputy DSL will then make a SAFER referral to Children’s Social Care. In these cases, parents/ carers will not be informed before seeking advice.
- The duty on teachers and lecturers to report FGM does not exist in at risk or suspected cases. College staff should report the concern to the DSL or the Deputy DSL following usual safeguarding procedure.

Forced Marriage

[The right to choose: Government guidance on-forced marriage](#)

College staff can contact the Forced Marriage Unit if they need advice or information: Contact: 020 7008 0151 or email fmu@fcdo.gov.uk or Halo Project Charity 01642 683045 or email info@haloproject.org.uk

Actions to be taken in response to Forced Marriage

Colleges can play an important role in safeguarding children from forced marriage. Teachers/lecturers should report information to the College Designated Safeguarding Lead or

Deputy DSL in their absence, following the referral routes as outlined in Making a referral Appendix J of the Safeguarding Policy. The DSL or Deputy DSL will liaise with external agencies, submitting a SAFER referral to child or adult Social Care as appropriate.

Potential Indicators

- Absence and persistent absence
- Request for extended leave of absence and failure to return from visits to country of origin
- Fear about forthcoming College holidays
- Surveillance by siblings or cousins at college
- Changes in behaviour, engagement, performance or punctuality
- Poor exam results
- Being withdrawn from college by those with Parental Responsibility
- Removal from a day centre of a person with a physical or learning disability
- Not allowed to attend extra-curricular activities
- Sudden announcement of engagement to a stranger
- Prevented from going on to further/higher education.

Appendix D - Child-on-child Abuse

(including bullying, cyber-bullying, sexting (sharing nudes & semi-nudes), up skirting, sexual violence, and sexual harassment)

Purpose

This appendix forms part of the College's Safeguarding Policy and provides clear guidance for all staff on the actions to take if they become aware that a learner is at risk of child-on-child abuse. This applies to any individual under the age of 18.

Staff must adopt a proactive attitude of "it could happen here" and respond appropriately to all concerns and reports—whether online or offline, within or outside of college settings.

It is essential that staff challenge inappropriate behaviours between learners. Dismissing behaviours such as sexual harassment as "just banter", "a laugh", "boys will be boys" or "part of growing up" contributes to a culture where abuse is normalised and tolerated.

Child-on-child abuse includes (but is not limited to):

- Bullying (including cyber, prejudice-based, and discriminatory bullying)
- Abuse in intimate personal relationships (teenage relationship abuse)
- Physical abuse

Sexual violence and harassment (as defined in Keeping Children Safe in Education (KCSiE) 2025):

- Sharing of nude/semi-nude images or videos (consensual or non-consensual)
- Upskirting (a criminal offence)
- Initiation or hazing-type rituals

The College maintains a zero-tolerance stance on all forms of child-on-child abuse, while also encouraging open dialogue around safeguarding, including sexual violence and harassment. We recognise that such behaviours may be occurring within our community and commit to responding robustly.

All cases involving those under 18 must be referred to the Designated Safeguarding Lead (DSL) or a Deputy DSL. Some groups—such as girls, LGBTQ+ learners, and those with SEND—may be at higher risk and must be supported accordingly.

Definitions

Child: Any individual under the age of 18.

Education, Health and Care Plan (EHCP): A statutory plan for children and young people up to age 25 who require more support than is available through SEND support.

Bullying: Repeated behaviour intended to hurt someone physically or emotionally. Forms include:

- Verbal: Name-calling, sarcasm, threats, teasing
- Physical: Hitting, kicking, punching, pushing
- Social: Exclusion, spreading rumours
- Psychological: Stalking, intimidation

Bullying may be motivated by prejudice related to race, disability, LGBTQ+ identity, or other perceived differences.

Cyber-Bullying: Online abuse using digital technologies, including messaging, social media, or mobile phones. It may occur anytime and be rapidly amplified.

Further guidance: [Cyber bullying: advice for headteachers and school staff](#)

Harmful Sexual Behaviour (HSB): Sexual behaviour that is inappropriate for the child's age or development and may be abusive. It may indicate the child has been abused and always requires referral to the DSL.

Sexting / Sharing Nudes or Semi-Nudes: This includes the consensual and non-consensual sharing of sexual images or videos. Creating, possessing, or sharing sexual images of under-18s is illegal, including selfies.

Guidance: [Sharing nudes and semi-nudes: advice for education settings working with children and young people - GOV.UK](#)

Sexual Harassment: Unwanted sexual conduct that violates dignity or creates a hostile environment. This can include:

- Sexual comments or jokes
- Inappropriate physical contact
- Online harassment
- Displaying sexual content
- Upskirting
- Coercive sexual behaviour or threats

Sexual Violence

As defined by the Sexual Offences Act 2003:

- Rape: Non-consensual penile penetration
- Assault by Penetration: Penetration with any object/body part without consent
- Sexual Assault: Non-consensual sexual touching
- Causing someone to engage in sexual activity without consent
- Consent means freedom and capacity to choose. It can be withdrawn at any time.
- A child under 13 cannot legally consent
- The age of consent is 16
- Sexual activity without consent is rape

Upskirting: Taking images under someone's clothing without their knowledge, intending to view genitals/buttocks. Criminal offence since 2019.

Initiation/Hazing: Rituals involving harassment or abuse as a means of initiating someone into a group. May involve online elements.

External Guidance

[Keeping children safe in education - GOV.UK](#)

[Working together to safeguard children - GOV.UK](#)

[Addressing child-on-child abuse: a resource for schools and colleges](#)

[Equality Act 2010: guidance - GOV.UK](#)

Required Actions for College Staff

All staff must:

- Recognise that child-on-child abuse is possible within any setting
- Reinforce safeguarding expectations at induction
- Educate learners through tutorials and lessons about identifying and reporting abuse
- Immediately report any concern to the DSL or Deputy DSL, even if the incident occurs off-site
- Refer to the Relationships and Behaviour Policy for potential sanctions
- Inform appropriate managers:
 - 14–16 Manager or Coordinator (for Y10/Y11 learners)
 - SENDCo/High Needs Manager (for learners with EHCPs aged up to 25)
- Support both alleged victims and perpetrators via referral to the Safeguarding Team
- Record all allegations and ensure learners are told what will happen next
- Involve parents/carers (including the Local Authority as corporate parent for a Child In Our Care) of under-18s or EHCP learners unless this places the learner at further risk
- Refer to Appendix J of the Safeguarding Policy for details on making a referral

Key Considerations (for DSL/Deputy)

When responding to an incident, DSLs should consider:

- The wishes of the victim regarding next steps
- Whether a crime has been committed
- The ages and developmental stages of those involved
- Any power imbalance, e.g. age, social status, SEND, or confidence
- Whether the behaviour is one-off or repeated
- Whether the incident occurred in a personal relationship
- Family dynamics and support for siblings
- Any wider safeguarding concerns such as child exploitation or trafficking
- Risks to others within the College community

Useful Resources and Support

- NSPCC Helpline 0808 800 5000
- NSPCC [Harmful Sexual Behaviour](#)
- ChildLine 0800 500 / www.childline.org.uk
- Kidscape www.kidscape.org.uk

- Anti-Bullying Alliance www.antibullyingalliance.org
- Bullying UK www.bullyinguk.org.uk
- [Brook Sexual Behaviours Traffic Light Tool](#)
- <https://undressed.lgfl.net/> - LGFL 'Undressed' provided schools advice about how to teach young children about being tricked into getting undressed online in a fun way without scaring them or explaining the motives of sex offenders.
- Farrer & Co: Addressing child on child abuse: a resource for schools and colleges. This resource provides practical guidance for schools and colleges on how to prevent, identify early and respond appropriately to [child on child abuse](#)

Appendix E - Online Safety

Purpose and Scope

This appendix outlines the College's guidance and expectations for staff where learners may be at risk of harm through online activity. It forms a key part of the College's overarching Safeguarding Policy and should be read in conjunction with it.

At the Etc, we recognise that a whole-college approach to online safety empowers staff to protect learners, educate them in safe digital practices, and act where risks arise.

While we support the full educational potential of digital technologies, we have a responsibility to safeguard learners from exposure to harmful content, contact, conduct, and commercial exploitation. These guidelines are intended to protect all learners from online safety incidents and ensure a safe, secure e-learning environment.

Any form of online abuse must be treated as a safeguarding issue and referred to the Designated Safeguarding Lead (DSL) or Deputy DSL in accordance with safeguarding procedures.

Definitions

- Children: Individuals under the age of 18; includes those aged 19–25 with an Education, Health and Care Plan (EHCP) for safeguarding purposes.
- Vulnerable Adult: A person with care and support needs who is at risk of abuse or neglect and unable to protect themselves due to those needs.
- All Learners: Regardless of age or background, any learner who experiences or is at risk of harm will be supported appropriately by the College.
- Cyberbullying: Bullying that takes place via digital devices or platforms.
- Nude or Semi-Nude Image Sharing: Previously referred to as sexting. Creating, possessing, or distributing such material of individuals under 18 is a criminal offence under the Sexual Offences Act 2003.
- Online Harassment: Unwanted online behaviour that affects an individual's dignity.
- Sexual Harassment: Unwanted sexual conduct, including online, which violates dignity or creates a hostile environment, often in the context of child-on-child abuse.

Online Risks

Blended and remote learning increase learners' exposure to online harm. All staff must be aware of the four key categories of online risk:

- Content: Exposure to illegal, harmful, or inappropriate material, e.g. pornography, extremism, or self-harm content. Exposure to illegal or harmful material—including misinformation, disinformation and conspiracy theories, as highlighted in KCSiE 2025
- Contact: Risk of grooming, exploitation, or manipulation by others online.

- Conduct: Learners' own behaviour, including sharing explicit content or engaging in bullying.
- Commerce: Risks such as phishing, online gambling, or scams.

It should be noted that KCSiE 2025 references guidance on generative AI issues.

Any concern must be reported to the Student Experience and Wellbeing Team immediately. Useful resources include Childline, CEOP, the UK Safer Internet Centre, and NSPCC.

Student Education and Prevention

Online safety education is a fundamental part of the College's safeguarding provision and is embedded into:

- Learner induction and tutorials, including discussion of online behaviour and digital decision-making.
- Teaching that promotes critical thinking and digital literacy, including fact-checking and respecting intellectual property.
- Staff acting as digital role models, reinforcing key messages across the curriculum.
- IT Services support for staff where temporary access to restricted content is needed for legitimate learning purposes (e.g. topics like extremism or discrimination).

Staff must also ensure learners are aware of the risks associated with unrestricted access to the internet on personal devices, especially 3G/4G or 5G-enabled devices.

Parental/Carer Engagement

Parents and carers play a crucial role in reinforcing online safety messages. The College will:

- Share relevant resources and information through the website
- Communicate regularly to support families in managing learners' digital activity and understanding emerging risks.

Use of Digital and Video Images

When capturing digital images:

- Ensure parental or student consent has been obtained.
- Only take images for educational purposes, with appropriate clothing and context.
- Images must not be shared, stored, or published without permission.
- Students' full names will not be used in conjunction with images online or in publications.
- Ensure the child in the image is not subject to restrictions with reference to being a Child In Our Care or under Child Protection
- All use must comply with data protection regulations and College policy.

Social Media and Staff Conduct

While social media can be used positively, staff and learners must be aware of associated safeguarding risks:

- Online abuse, bullying, image sharing, grooming, radicalisation, and exploitation must be reported and addressed under the appropriate policies.
- Sharing nude or semi-nude images, including via messaging apps, is a safeguarding concern. These incidents must be escalated to the DSL or Deputy DSL.

Staff must not:

- Share personal contact information with learners.
- Accept or send friend requests via social media platforms (e.g. WhatsApp, Facebook, Snapchat).
- Communicate via personal email accounts or mobile numbers.

Breaches will be treated as misconduct under the Staff Code of Conduct.

If a learner discloses receiving explicit content:

- Do not view or ask to view the image.
- Do not copy or forward the material.
- Immediately inform the DSL or Deputy DSL.

Filtering, Monitoring, and Cybersecurity

In accordance with Keeping Children Safe in Education (KCSiE) 2025, the College ensures:

- Filtering and monitoring systems are in place (Smoothwall) and meet the DfE Filtering and Monitoring Standards.
- These systems are reviewed annually and led by staff with clear responsibilities (included in the DSL's job role).
- Harmful content is appropriately blocked without impeding educational access.
- Staff receive regular safeguarding training, including online safety and cybersecurity awareness.
- The College complies with the Cyber Security Standards for Schools and Colleges (GOV.UK) and is aware of the DfE 'Plan technology for your school' self-assessment tool which may be used to review its filtering and monitoring systems against statutory expectations and proactively address any gaps.

Staff Responsibilities

All staff must:

- Promote online safety during induction and throughout the curriculum.
- Be alert to the signs of online abuse and respond promptly to concerns.
- Refer safeguarding issues using ProMonitor or directly to the Safeguarding Team.

- Notify relevant managers (e.g. 14–16 Manager, Head of Foundation Skills for EHCP learners).
- Consider the needs of both victims and alleged perpetrators, ensuring appropriate support is put in place.
- Significant concerns must be referred immediately to the DSL or Deputy DSL using the reporting processes in Appendix A of the Safeguarding Policy.

1:1 Online Sessions – Expectations

Staff must follow the following safeguarding expectations when conducting remote 1:1 sessions:

- Complete annual safeguarding training and read Part 1 (and Annex B if applicable) of KCSiE 2025.
- Gain prior consent from parents/carers for 1:1 sessions involving under 18s or vulnerable learners.
- Use only Microsoft Teams for virtual sessions. Use of Zoom or other platforms is not permitted.
- Ensure suitable locations, appearance, and professional conduct.
- Inform learners and parents/carers if a session is being recorded.
- Record attendance and report any concerns via safeguarding procedures.

Make sure you do:

- Educate students about online risks and safe behaviours.
- Use a neutral background or blur background.
- Conduct all online sessions through Microsoft Teams.
- Record sessions where required for safeguarding.

Make sure you don't:

- Use personal accounts or devices for communication.
- Stream from inappropriate or unprofessional environments.
- Leave personal/confidential applications open while screen sharing.
- Further training is available through Student Experience and Wellbeing, Tutorial Resources, and the College Gateway Safeguarding pages.

Implementation and Incident Handling

Any breach or allegation of online safety misconduct involving staff or students must be reported immediately to the Safeguarding Team and relevant Curriculum Manager or Line Manager.

All incidents will be subject to formal investigation, with outcomes recorded and appropriate action taken.

Further Resources and Guidance

Government and Official Guidance:

Keeping Children Safe in Education (KCSiE) 2025 – GOV.UK Statutory safeguarding guidance for all schools and colleges in England. Effective from 1 September 2025.

Filtering and Monitoring Standards – GOV.UK Sets out the Department for Education's expectations for managing internet filtering and monitoring systems in schools and colleges.

Cyber Security Standards for Schools and Colleges – GOV.UK DfE guidance outlining the minimum cyber security standards educational institutions should meet.

Safeguarding and Online Safety Support:

NSPCC – Online Safety Advice for parents, carers, and education professionals to help keep children safe online.

UK Safer Internet Centre provides online safety tips, resources, and tools to help young people stay safe online. Includes education materials, helplines, and guidance for schools and colleges.

CEOP Safety Centre Part of the National Crime Agency, CEOP allows young people and adults to report concerns about online grooming, abuse, or exploitation.

Useful Information:

[Thinkuknow](#) – NCA CEOPs advice on online safety

[Disrespectnobody](#) – Home Office advice on healthy relationships, including sexting and pornography

Internet Matters – Online Safety Advice for Families - A UK-based not-for-profit launched by major internet service providers. Offers practical guidance on topics like parental controls, cyberbullying, sexting, radicalisation, and device-specific internet rules. It includes interactive tools and personalised Digital Toolkits for families

[Parentzone](#) - Help for parents on how to keep their children safe online

[Childnet cyberbullying](#) – Guidance for schools on cyberbullying

[PSHE association](#) – Guidance and useful teaching resources covering online safety issues including pornography and the sharing of sexual images

[Sharing-nudes-and-semi-nudes-advice-for-education-settings](#)

[Education-for-a-connected-world: UK Council for Internet Safety](#)

[Teaching-online-safety-in-schools: DfE](#)

Appendix F - Care Experienced Children

(includes Children in our Care, care experienced and care leavers), 14-16s and learners with learning difficulties and/or disabilities

Purpose and content

This appendix clarifies how the College provides enhanced safeguarding and academic support for:

- Children in Our Care (CiOC)
- Care Leavers & Care Experienced Learners
- 14–16-year-olds (Year 10/11)
- Learners with SEND (Special Educational Needs & Disabilities)

It is part of the College Safeguarding Policy, aligned with statutory UK guidance and procedures from Hartlepool & Stockton and South Tees Safeguarding Children Partnerships.

Definitions:

Child in Our Care (CiOC)

Previously referred to as a Looked After Child (LAC), a child or young person who is being looked after by a local authority in accordance with the Children Act 1989. This can occur for various reasons, including neglect, abuse, family breakdown, or voluntary accommodation.

A Child is Considered "In Our Care" if they are:

- Subject to a care order made by a court (Section 31 of the Children Act 1989), or
- Voluntarily accommodated by the local authority (Section 20 of the Children Act 1989), with parental agreement.

Care Arrangements May Include:

- Foster care
- Residential children's homes
- Living with a relative or family friend under local authority supervision
- Living in semi-independent or supported accommodation (especially for older teens)

Key Points for Staff:

Children in Our Care are legally protected and have statutory entitlements, including an Independent Reviewing Officer (IRO), a Personal Education Plan (PEP), and support from a Virtual School Head.

They are often prioritised for additional support, such as:

- Pupil Premium Plus (PP+)
- 16–19 bursaries
- Designated staff member oversight in colleges

Their status is confidential and must be handled sensitively.

Care Leavers (Statutory Definition)

A young person aged 16–25 who:

- Has been looked after by a local authority for at least 13 weeks (in total) since age 14, and
- Was still in care on or after their 16th birthday.

Entitlements in FE and beyond:

- Statutory local authority support, including:
- A Personal Adviser (PA) until age 25
- A Pathway Plan setting out support for education, training, housing, and employment
- Financial help, e.g. the 16–19 Bursary Fund (vulnerable learner bursary) (up to £1,200 per year)
- Priority housing in some local authorities
- HE Care Leaver bursaries and access schemes (for those progressing to university)

Staff Considerations:

- Mark as a vulnerable learner in College systems (e.g. ProMonitor)
- Refer for Student Finance support and check eligibility for bursaries
- Prioritise access to pastoral, mental health, and mentoring services
- Work closely with the learner's Personal Adviser and Virtual School/Leaving Care Team

Care Experienced Learners (Wider Definition)

Any learner who has ever spent time in care, regardless of:

- Their age when they entered or left care
- The type of care they were in (foster care, residential care, kinship care, special guardianship, adoption)
- How long they were in care
- May be over 25, or not meet the 13-week threshold for care leaver status

Why this matters:

Although not eligible for all statutory support, many care experienced learners face similar challenges to care leavers — including trauma, mental health issues, disrupted education, and lack of family support.

Using this inclusive term helps remove stigma and ensures support is extended to all those affected by care experiences.

Staff Considerations:

- Ask sensitively in enrolment or tutorial conversations if a learner is care experienced
- Offer equivalent wellbeing and support services, even if they are not statutory care leavers
- Use trauma-informed approaches and avoid assumptions based on age or formal status
- Consider eligibility for discretionary bursaries or hardship funds

Why This Distinction Matters in FE

- Some learners may not disclose care experience unless they are directly asked — especially if they do not realise it qualifies for additional support.
- Being care experienced does not end at 18 or 25 — the impact can last into adulthood and across educational transitions.

Procedures & Support

Advanced Safeguarding Practitioners (ASPs) oversee care-experienced learners and will log the following on Pro-Solution, uploaded into ProMonitor:

- Social Worker / Personal Adviser contact
- Virtual School Head info
- Course and care history
- Agency involvement

Statutory Oversight: ASPs ensure that a college representative attends all PEP and Pathway Plan review meetings, ensuring that timely information from curriculum staff is shared, via a completed PEP form, with the Local Authority. DSLs or High Needs Managers may also represent the college, escalate concerns, and feed learnings back to staff when applicable.

Confidentiality & Referral: Care-experienced status is restricted to relevant staff. Any safeguarding concerns—academic, emotional, behavioral, or welfare-related—must be reported via ProMonitor Safeguarding Referral, per Appendix A procedures.

14–16-Year-Old Learners (Year 10/11)

Oversight & Enrolment

The 14–16 Manager maintains a registry of all under-16 learners, including:

- Home school and tutor contacts
- Course enrolment details
- Relevant agencies (e.g. social care)
- Learner ILPs in ProMonitor flagged “Under-16” to ensure staff are aware.

Class Placement and Risk

No learner aged 19 or above may be in a classroom with under-16s unless they hold an EHCP, in which case a Risk Assessment Panel (see Appendix K) must pre-assess placement suitability.

Monitoring & Procedure

Key staff (personal tutors, curriculum leads) receive training on 14-16 protocols during induction and annual refresher sessions.

Any safeguarding concern for a 14–16 learner must be referred using the Safeguarding Team referral process, with immediate notification to the 14–16 Manager.

Learners with SEND

Additional Vulnerabilities

Learners with SEND may face:

- Misinterpretation of behaviour or injury as disability-related
- Increased isolation or bullying
- Low visibility of distress
- Communication difficulties

Referral Protocols

All staff must be trained so they're able to:

- Correctly identify safeguarding indicators
- Make referrals using Appendix A
- For learners under 25 with EHCPs or high-needs funding, concerns must also be escalated to the High Needs Manager.

Key Responsibilities

Staff & Oversight

Director of Student Experience and Wellbeing:

- Oversees all safeguarding provision including CiOC and care-experienced systems.
- Ensures compliance with statutory reviews, intervention timetables, and risk panel assessments.

Designated Safeguarding Lead (DSL) & Deputy DSL:

- Authorise high-level action alongside Advanced Safeguarding Practitioners
- Manage escalation through Appendix A referral channels

Advanced Safeguarding Practitioners (ASPs):

- Maintain individual CiOC/care-leaver records.
- Liaise with personal tutors, curriculum managers, and local authority partners.
- Lead on all PEP attendance and feedback loops.
- Represent the College in statutory reviews (PEP)

14–16 Manager:

- Coordinates all processes and risk assessments around under-16 learners
- Ensures compliance with placement policies.

Personal Tutors & Curriculum Staff:

- Be aware of flagged statuses (care-experienced, under-16, SEND) in ILPs/profiles.
- Monitor learner wellbeing and progress.
- Raise concerns via ProMonitor referral and directly alert relevant managers (ASP or 14–16 Manager).
- Provide timely information upon request for PEP meetings.

Referral & Escalation Flow

- Concern detected → Staff member completes ProMonitor Safeguarding Referral
- Case allocated to Welfare Officer (Welfare) or Advanced Safeguarding Practitioner (safeguarding)
- If related to a care-experienced or CiOC learner → escalate to ASP and check/update learner file in ProMonitor
- If related to a 14–16 learner → notify 14–16 Manager immediately
- If learner is SEND with an EHCP → also inform High Needs Manager
- For statutory reviews (PEP/Pathway), ASP attends and writes College input; follow-up interventions monitored centrally

Appendix G – The Prevent Duty

Purpose and Content

This appendix forms part of the College Safeguarding Policy and sets out clear procedural guidelines for all staff to fulfil the College's statutory duty to prevent individuals from being drawn into terrorism or extremism, as required by the Counterterrorism and Security Act 2015 (the Prevent duty).

Staff are required to take immediate and appropriate action if they become aware that a learner or staff member may present a threat to themselves or others. Extremist ideology and radicalisation are safeguarding concerns and should be treated as such, in line with the College's whole-institution approach to safeguarding. Staff must remain vigilant and adopt the principle of 'it could happen here' to ensure all concerns are taken seriously and acted upon in accordance with college procedures and external legislative requirements.

Definitions

In line with UK Government guidance (2015):

- **Fundamental British Values:** Democracy, the rule of law, individual liberty, mutual respect and tolerance for those with different faiths and beliefs.
- **Radicalisation:** The process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.
- **Extremism:** 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. This includes calls for the death of members of the armed forces.
- **Terrorism:** Actions intended to endanger life or cause serious violence, damage property, or disrupt electronic systems, with the aim of influencing government or intimidating the public for political, religious, or ideological purposes.
- **Entryism:** Deliberate attempts by extremist individuals or groups to gain positions of influence to promote extremist agendas.
- **Channel:** A multi-agency programme supporting those vulnerable to being drawn into terrorism, involving risk identification, assessment, and tailored support plans.
- **Silver Group:** A local multi-agency forum sharing intelligence and coordinating action to reduce or remove extremist and terrorist activity.
- **Disinformation:** Deliberately created fake or misleading stories, often for financial or political motives.
- **Misinformation:** Fake or misleading stories not necessarily created or shared with the intent to mislead.
- **Conspiracy Theories:** Alternative explanations for events or situations, often suggesting hidden agendas by groups or organisations.

Legislative Framework and Rationale

The UK is currently assessed at a 'Substantial' risk of international terrorism. Section 26 of the Counterterrorism and Security Act 2015 places a legal duty on further education colleges to

have 'due regard to the need to prevent people from being drawn into terrorism' (the Prevent duty). The College must:

- Demonstrate awareness and understanding of the risks of radicalisation both internally and locally.
- Establish mechanisms to assess and mitigate these risks.
- Ensure all staff understand and implement the Prevent duty.
- Actively promote fundamental British values through all aspects of college life.

These requirements are reinforced by the Department for Education's guidance and Keeping Children Safe in Education (KCSiE) 2025.

College Response

The Governing Body ensures that the College's culture, mission, and values are clearly defined and that safeguarding arrangements, including those relating to Prevent, are developed with reference to local authority policies, all relevant legislation, and sector good practice (including Ofsted guidance). Specific risks, such as entryism, are actively mitigated through robust vetting and, where necessary, suspension of governors.

The College has established a mandatory safeguarding training schedule that includes a safeguarding (including Prevent) induction, annual update training on safeguarding (including Prevent) (see Appendix L, Arrangements for Safeguarding Training).

The training includes raising awareness of local threats and the following potential signs and symptoms that may indicate a person is at risk of being drawn into terrorism

Key College Actions

- **Prevent Risk Assessment Plan:** Reviewed annually by the Designated Safeguarding Lead (DSL), with progress reported to the Safeguarding Group and Governing Body. The plan covers external speakers, IT, learner voice, subcontractors, and the tutorial system.
- **Training:** Mandatory safeguarding (including Prevent) induction and annual update training for all staff, with a focus on local threats and signs of vulnerability to radicalisation (see Appendix L).
- **Embedding British Values:** All staff must promote British values in daily interactions and curriculum delivery. The tutorial programme covers safeguarding against radicalisation and terrorism, with support from the Student Experience and Wellbeing team. Behavioural concerns are addressed via the Staff Code of Conduct and learner Relationships and Behaviour Policy, with referrals to police or Channel as appropriate.
- **Co-operation with Authorities:** Active participation in multi-agency forums and cooperation with local authorities and police.
- **Information Sharing and Referral:** Internal and external referral procedures are robust, following a notice-check-share approach. All concerns must be reported to the DSL or deputy DSL, following Safeguarding Policy referral routes (see Appendices A and P).
- **Policies and Procedures:** Policy owners are responsible for ensuring Prevent actions are embedded and reviewed regularly for compliance.

- **Learner Voice:** Monitored by the Head of Quality through focus groups and surveys.
- **Fundraising:** Managed to ensure no funding is provided to extremist groups; all activities are subject to scrutiny and review.
- **Online and E-Safety:** IT systems are subject to filtering and monitoring, reviewed annually, and in line with Department for Education standards and KCSiE 2025. All internet usage is filtered and monitored, via Smoothwall, with clear processes for identifying and acting on safeguarding risks.
- **External Materials:** All promotional materials on campus are reviewed to ensure they do not promote extremist views.
- **Subcontractors:** Annual compliance checks are required, with oversight by the Director of Business Development.
- **Visitors and Speakers:** All visitors must adhere to the Visitors to College Premises policy. Risk assessments are mandatory for speakers/events, with approval by a manager and the DSL. Speakers with extremist views are not permitted, and staff must intervene if inappropriate content is delivered.

Roles and Responsibilities

- **Designated Safeguarding Lead / Deputy:** Liaison with Prevent Coordinators, participation in Bronze and Silver Groups, managing referrals to Channel/police, and overseeing staff training.
- **Advanced Safeguarding Practitioners:** Referral of concerns, support for individuals/groups, mentoring, and staff training.
- **Student Experience and Wellbeing Team:** Promotion of British values, management of cultural/religious events, oversight of the faith room, student groups, and the Students' Union.
- **Group Executive Director: Planning & Infrastructure:** Emergency planning, campus security, IT monitoring, and external lettings compliance.
- **Group Executive Director: Finance:** Oversight to prevent College funds being used for terrorist activity.
- **Director of Business Development Unit:** Ensuring subcontractor compliance with Prevent duty.

All staff must familiarise themselves with these procedures and their responsibilities under college policy and relevant legislation, ensuring their actions contribute to a safe and inclusive learning environment.

Appendix H – Exploitation

Child Criminal Exploitation (CCE), Child Sexual Exploitation (CSE), Adult Criminal Exploitation (including County Lines and gangs)

Purpose and Content

This appendix to the College Safeguarding Policy provides clear procedural guidance for staff on the actions required if they become aware that a learner is at risk of, or suspected to be currently experiencing, exploitation through county lines gangs, or other forms of criminal or sexual exploitation. All concerns must be referred in accordance with college safeguarding procedures and protocols, and in line with statutory duties under the Children Act 1989, the Care Act 2014, and the College's obligations under Keeping Children Safe in Education (KCSiE) 2025.

Definitions

- **Child Criminal Exploitation (CCE) and Child Sexual Exploitation (CSE):** Both are forms of abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate, or deceive a child into participating in criminal or sexual activity. This may be in exchange for something the victim needs or wants, for the financial benefit or status of the perpetrator, or through violence or threats. Both boys and girls can be affected, and exploitation can involve trafficking children for these purposes.
- **Child Criminal Exploitation (CCE):** Includes, but is not limited to, children being forced or manipulated into transporting drugs or money (county lines), working in illegal enterprises (e.g. cannabis factories), shoplifting, pickpocketing, vehicle crime, or committing/threatening serious violence.
- **County Lines:** Refers to gangs and organised criminal networks exporting illegal drugs using dedicated mobile phone lines ("deal lines"). Children and vulnerable adults are exploited to move, store, and sell drugs and money, often under coercion, intimidation, violence (including sexual violence), and threats.
- **Child Sexual Exploitation (CSE):** A form of sexual abuse involving physical or non-contact activities, including grooming, online abuse, and coercion into sexual acts. This can affect any child, including those aged 16 or 17 who can legally consent to sex, and may not always be recognised by the victim as exploitation.
- **Other Terms:**
 - **Deadlines:** Dedicated mobile phones used to take drug orders.
 - **Cuckooing:** When perpetrators take over the home of a vulnerable person to facilitate criminal activity.
 - **Plugging:** Concealing drugs internally to avoid detection.

External Legislation and Guidance

Staff must act in accordance with relevant external legislation and guidance, including:

- [Keeping children safe in education 2025](#)
- [Care Act 2014](#)
- [The Children Act 1989 guidance and regulations](#)
- [Child sexual exploitation: definition and guide for practitioners - GOV.UK](#)

- [County Lines Toolkit for Professionals | The Children's Society](#)
- [Criminal exploitation of children, young people and vulnerable adults - county lines](#)

How County Lines Exploitation Affects Young People and Vulnerable Adults

County lines and related exploitation:

- Can affect any child or young person under 18, or any vulnerable adult over 18.
- May still constitute exploitation even if the activity appears consensual.
- Can involve force, enticement, violence, or threats, and is often marked by a power imbalance (due to age, gender, cognitive ability, status, or access to resources).
- Involves some form of exchange (money, drugs, gifts, status, protection, friendship, or the prevention of harm).
- Victims remain victims regardless of any perceived reward or benefit received.

Vulnerability Factors

Recorded cases show:

- Children as young as 12, but most commonly 15–16, being exploited or moved by gangs.
- Both boys and girls, and individuals from any ethnic background, may be targeted.
- Social media is often used to make initial contact.
- Class A drug users may be targeted for ‘cuckooing’.
- Vulnerability is increased by factors such as prior abuse, unstable home environments, social isolation, economic hardship, homelessness, disabilities, mental health or substance misuse issues, being in care, or exclusion from mainstream education.

Signs to Look Out For

Indicators of CCE and CSE include learners who:

- Have unexplained gifts, money, or new possessions.
- Associate with others involved in exploitation.
- Show changes in emotional wellbeing.
- Misuse alcohol or drugs.
- Go missing or return home late.
- Frequently miss education or disengage from learning.

Specific indicators of CSE:

- Older boyfriends/girlfriends.
- Sexually transmitted infections, sexualised behaviour beyond age expectations, or pregnancy.

Specific indicators of CCE/county lines:

- Going missing and being found far from home.

- Being a victim or perpetrator of serious violence (e.g., knife crime).
- Involvement with drugs (receiving requests, moving, or handling money).
- Use of 'plugging' to conceal drugs.
- Being found in accommodation with no connection (trap houses/cuckooed addresses/hotels).
- Owing a 'debt bond' to exploiters.
- Having bank accounts used for criminal activity.

College Procedures and Protocols

Any concern regarding criminal exploitation, county lines, or sexual exploitation must be referred immediately to the College safeguarding team, following the processes outlined in Appendix A (Child and Vulnerable Adult Protection) of the College Safeguarding Policy. Staff must not investigate concerns themselves but must record and report all relevant information in line with college procedures and external safeguarding requirements.

All staff are required to:

- Be familiar with the signs of exploitation and the College's safeguarding protocols.
- Complete all mandatory safeguarding training, including updates on CCE, CSE, and county lines.
- Work in partnership with external agencies as appropriate, in line with legal and local safeguarding arrangements.

Failure to follow these procedures could result in disciplinary action and may place learners at further risk of harm. Staff must always act in the best interests of learners and vulnerable adults, ensuring compliance with both College policy and statutory safeguarding duties.

Appendix I - Early Help Referrals

Purpose and Scope

This appendix to the College Safeguarding Policy outlines clear procedures in identifying children or young people who may benefit from a multi-agency response to issues affecting them or their families. The guidance ensures alignment with college safeguarding procedures and is underpinned by statutory requirements and external guidance, including 'Working Together to Safeguard Children 2023' and the Children Act 1989.

Early Help

Early Help refers to providing support as soon as a concern is identified, at any stage in a young person's life. Where it is recognised that a young person would benefit from co-ordinated support, an inter-agency Early Help assessment should be initiated. Chapter one of 'Working Together to Safeguard Children 2023' gives comprehensive guidance on this process. Within the college, the Safeguarding Team is responsible for implementing any required Early Help measures.

Identifying the Need for Early Help

All staff should be vigilant to the possibility that any young person may require Early Help, but particular attention should be given to those who:

- Are disabled or have specific health conditions and additional needs.
- Have special educational needs (with or without an Education, Health and Care Plan).
- Have mental health needs.
- Are young carers.
- Are at risk of involvement in anti-social or criminal behaviour, including gang activity or county lines.
- Are frequently missing from home or care.
- Are at risk of modern slavery, trafficking, or exploitation.
- Are at risk of radicalisation or other forms of exploitation.
- Have a family member in prison or are affected by parental offending.
- Are in families experiencing challenges such as substance misuse, adult mental health problems, or domestic abuse.
- Are misusing substances themselves.
- Have returned home from care.
- Are at risk of so-called 'honour'-based abuse, including Female Genital Mutilation (FGM) or forced marriage.
- Are privately fostered.
- Are persistently absent from education, including partial absences.

Early Help is particularly important where a young person and their family would benefit from support from more than one agency (e.g. education, health, housing, police). An inter-agency assessment should clarify what support is needed to prevent escalation to statutory intervention under the Children Act 1989.

Making an Early Help Referral

If staff believe a young person would benefit from Early Help, they should contact an Advanced Safeguarding Practitioner or Welfare Officer. The Student Experience and Wellbeing Team will complete an Early Help Assessment to determine the level of need. If appropriate, a referral will be made to the local Children's Hub.

Where the threshold for Early Help is not met, the team will consider, and advise upon, implementing suitable interventions within college. It is essential that the young person, the safeguarding and welfare team, and curriculum staff work together in the best interests of the young person.

If circumstances change or concerns persist, the Early Help assessment framework should be reviewed and further action taken as necessary.

Ensuring Effective Early Help

To ensure Early Help is effective:

- Assessments must be carried out with the consent of the young person and their parents or carers, involving all relevant professionals.
- College staff, in partnership with the Student Experience and Wellbeing Team (safeguarding and welfare), should discuss concerns with local authority children's social care, following the procedures set by the local authority.
- Where consent is not given the lead professional must decide if, without support, the young person's needs are likely to escalate. If so, a referral to local authority children's social care may be required.

At any stage, if it is suspected that a young person may be a 'child in need' as defined by the Children Act 1989, or is at risk of significant harm, an immediate referral to local authority children's social care must be made. While any professional can make this referral, an Advanced Safeguarding Practitioner, the Designated Safeguarding Lead (DSL) or the Deputy DSL should take the lead in making and managing the referral.

Appendix J - Making a Safeguarding Referral

Purpose and Overview

This appendix to the College Safeguarding Policy provides staff with clear guidance on making safeguarding referrals.

It explains when and how to refer concerns to the College Safeguarding Team, children's social care, adult services, or the police. Staff should only make a **direct referral** when a young person or vulnerable adult is at **immediate risk of serious harm**, and either:

- A Designated Safeguarding Lead, Deputy Safeguarding Lead or Advanced Safeguarding Practitioner is not available, or
- Consulting with them would cause a delay that increases risk.

Exception: Curriculum staff must make a direct referral to the police if they discover that Female Genital Mutilation (FGM) appears to have been performed on a girl under 18.

While all staff can make referrals, normally the College's trained Safeguarding Team will decide and make referrals on behalf of the College.

Safeguarding Team Contacts

College Safeguarding Objectives

- Provide a safe environment where children, young people, and vulnerable adults can learn and develop.
- Identify those experiencing or at risk of significant harm, including radicalisation or terrorism.
- Take appropriate action and provide support to achieve positive outcomes for affected students, through internal and external services.
- Promote safeguarding through the curriculum, pastoral care, and a college ethos where students feel safe, valued, and heard.

Reporting Procedures

If you suspect or know of a safeguarding concern, or someone discloses information to you, you must act **immediately**.

- Allegations against staff should be reported to the Principal.
- Allegations against the Principal should be reported to the Chair of Governors.
- The Designated Safeguarding Lead can advise on such concerns.

When a Disclosure is Made:

- Try to ensure that you are in a private place
- **Listen carefully** and remain calm.

- **Do not promise confidentiality** but explain you will handle it sensitively and what will happen next.
- **Reassure** the person the concern is taken seriously.
- **Do not ask leading questions or investigate.**
- **Do not examine injuries.**
- **Never judge.**
- **Record the exact words, date, time, and place.**
- **Contact a Safeguarding Team member as soon as possible.**

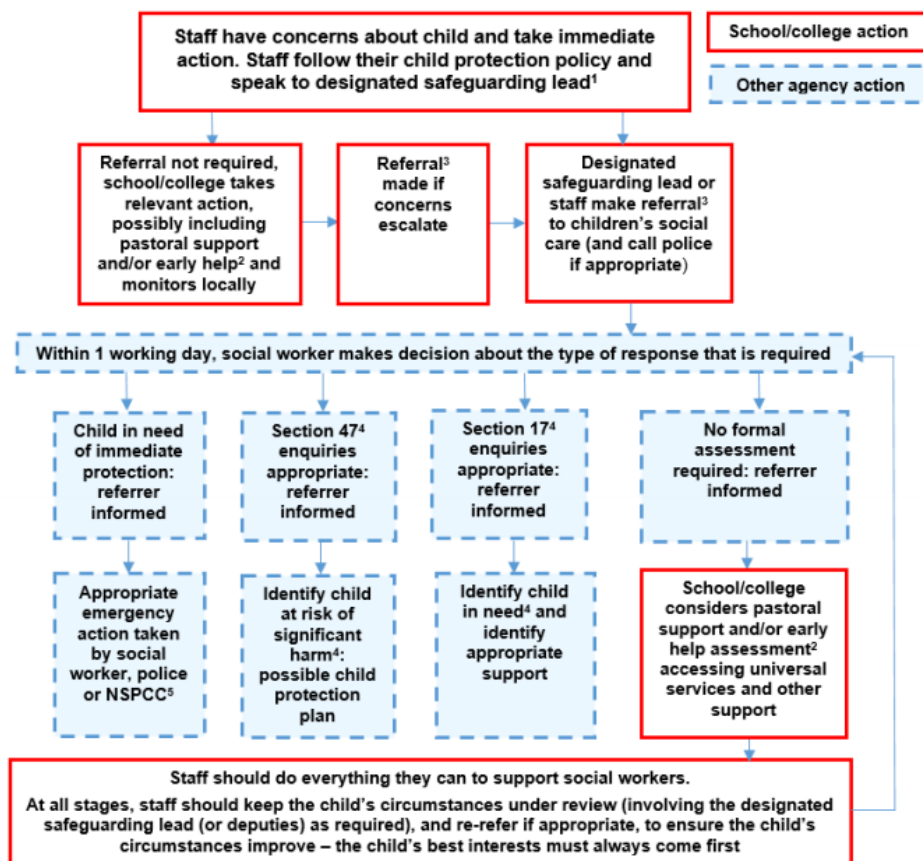
Reporting Safeguarding Concerns

Step	Action
Recognise	Disclosure made or concern arises
Respond	Reassure individual; do not promise confidentiality
Record	Write down facts only; avoid leading questions or judgments
Report	Notify Safeguarding Team or Principal immediately

*If concerns arise outside office hours, contact the Emergency Duty Team on **01642 524 552** or the Police for urgent situations.*

Always err on the side of caution.

The information below is taken from the Keeping Children Safe in Education 2025 DfE Statutory Guidance and sets out actions to take if there are concerns about a young person.



After Reporting

- Advanced Safeguarding Practitioners review all referrals and decide on next steps, including possible external referrals.
- Actions and outcomes will be reported back to the initial referrer when appropriate.

Staff Referral Guide – Prevent

Prevent focuses on protecting students from being drawn into terrorism or extremism.

There is no single profile of someone vulnerable to radicalisation. Risks apply to any age, background, or belief. People who are vulnerable to becoming involved in terrorism can be any age, from any group, faith, ethnicity or background. As well as religious extremism, the Prevent agenda is also very concerned with political extremism from both the far Left and the far Right, as well as some radical animal rights and environmental activists. There are many factors associated with a person who can become vulnerable to being drawn into extremist or terrorist activity. Prevent is about keeping our students safe from the risk of being drawn into radicalisation/terrorism and staff have a key role to play in this endeavour. All staff have a moral and legal duty to protect students from the risk of radicalisation.

- Staff may notice early signs but not always understand their significance. Vigilance is key.
- If you have concerns about radicalisation, **refer to the Safeguarding Team using the usual process.**
- If there is an imminent risk, call the Police immediately and alert the Duty Manager.
- The Safeguarding Team will review and, if appropriate, refer cases for specialist support.

Key Points for Prevent Referrals:

- Any cause for concern, no matter how small, is valid for referral.
- If unsure, always refer—better safe than sorry.
- Seek advice if needed from Safeguarding Team members.

Appendix K – Responses to Self-Harm

Definitions:

For this policy, references to 'child' or 'children' relates to anyone under the age of eighteen in line with Keeping Children Safe in Education (2024).

Suicide - Self-harm, resulting in death; The act of killing oneself deliberately

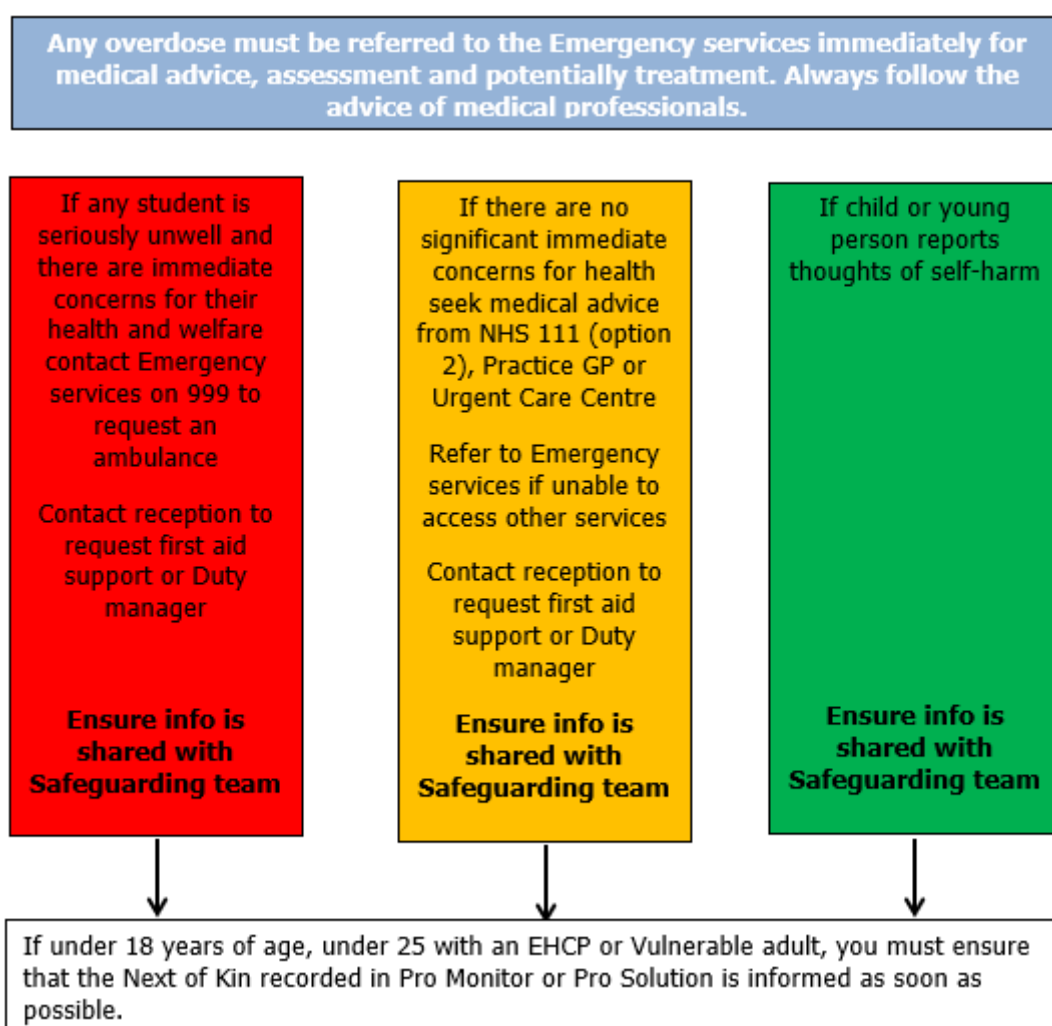
Attempted Suicide - Self-harm with intent to take life, resulting in non-fatal injury

Suicidal Ideation - Suicidal thoughts about how to kill oneself.

Suicide Plan - A clear suicide plan outlining the process to be followed.

Deliberate Self harm/Self-harm - In its broadest sense, self-harm describes a wide range of things that people do to themselves in a deliberate and usually hidden way, which are damaging.

Responding to incidents of Self-harm



If blades or sharp objects are used to self-harm, the Student Experience and Wellbeing Manager for the site must be contacted. They will arrange for storage and safe disposal.

Student Experience and Wellbeing Managers will liaise with relevant managers to agree if any further action (such as risk assessment or creation of safety plans) is required after incidents

of self-harm. Repeated incidents of self-harm may result in a fitness to study panel being called.

The Safeguarding and Welfare team will monitor and if appropriate make referrals for therapeutic support.

What is self-harm?

In this document the words “self-harm” is used to cover acts of self-poisoning or self-injury which may or may not be deliberate or include a wish to die. Most young people who self-harm do not intend to risk their lives and most self-harming behaviour is unlikely to lead to death. However, it is also important to note that some young people do die.

It can involve

- Cutting or scratching with knives, razor blades or other sharp implements
- Deliberately taking overdoses of drugs, or swallowing other substances
- Burning oneself with, for example, flames, heated metal, wax or chemicals
- Hitting or banging one’s arms, legs or head on walls, or with fists or objects
- Pulling out hair
- Putting objects under the skin or elsewhere in the body e.g. needles
- Taking risks with the intention of hurting oneself which may also increase the risk of exploitation
- Self-strangulation
- Eating disorders

It is the expression of and temporary relief from overwhelming, unbearable and often conflicting emotions and feelings. Self-harming behaviours can become addictive and compulsive.

Self-harm is often (but not exclusively) a way to cope with unbearable feelings.

Young people may self-harm to feel more in control. They may feel desperate about a problem and not know where to get help. It may help to relieve the tension of bottled-up feelings. It can be used as a way to punish themselves when feelings of guilt or shame become unbearable.

The behaviour can also be a way of expressing anger towards an adult they care deeply about. By directing their anger towards themselves they can express it without getting into an argument with their parents.

Inflicting self-injury can have an anti-suicide function. Self-injury can prevent a young person from acting on suicidal thoughts.

Self-harm may be used as a “grounding strategy”. Inflicting pain in the here and now can stop intrusive and painful memories and flashbacks and “ground” young people in the present moment.

Some young people have not developed an ability to ask for help or they may not feel comfortable to do so. Expressing their distress in a physical way can be a strategy to ask for comfort. We can think about this as care seeking, rather than attention seeking.

Why do people self-harm?

People self-harm for many reasons and everybody’s experience is different.

- Can be a method of coping or validating emotional pain or psychological trauma like abuse

- Can be a way of surviving overwhelming feelings of helplessness and powerlessness; feelings are numbed or released by self-harming in order to survive a deeper despair.
- Is not necessarily a precursor to suicide (but may be). Self-harm is often a means of staying alive, rather than trying to take one's life.
- Takes place across all ages, genders and backgrounds
- Is often hidden very carefully and many people do not seek medical care

Intent

This policy sets out the steps that the Etc expects all staff to adopt in responding to self-harm to ensure that all students are provided with a safe learning environment.

Scope

The Policy applies to all students at the Etc group. Where subcontractors have children or vulnerable adults it agrees to have a Self-harm Policy that fully recognises its responsibilities to safeguard and promote the welfare of children and vulnerable adults. The Self-harm Policy must ensure the health and safety of students. It will detail its approach to de-stigmatising mental health, support available and how it manages suspected self-harm in students. The subcontractor will ensure that all staff are familiar with the policy and consistent in its application.

The policy will recognise that all students can be at risk from self-harm, but it is important to consider that there are some students who may be particularly vulnerable.

Where subcontractors have children or vulnerable adults it must ensure that all staff are vigilant and consider the possibility of exploitation.

The subcontractor will provide a copy of the Self-harm Policy to the College and make records relating to training around the Policy available to the College for audit when requested.

It takes in consideration statutory guidance from Keeping Children Safe in Education (2024).

Approach

Self-harm and Stigma

Self-harm is often stigmatised because people find it difficult to understand and empathise with. While many mental health problems have an invisible label, people who self-harm often have scars or other visible signs that make them noticeable in public. Many people hide their scars obsessively to prevent the negative consequences of them being seen. People who do show their scars may do so as a reaction to the incredible secrecy, and one should not assume that they are attention seeking, although attention may well be needed.

The effect of public judgement can lead to a further reduction of confidence and self-esteem and promotes the cycle that leads to self-harm in the first place; preventing some young people from speaking out. It can be difficult for young people to seek help from the NHS or from those in positions of authority.

Equality & Diversity considerations

Cultural sensitivity and awareness of identity is important when working with young people who self-harm from different black and minority ethnic (BME) communities. Communities or groups that experience issues relating to a loss of cultural identity, racism and discrimination are more likely to experience mental distress than those who do not. Practitioners need to be sensitively aware of this diversity. General characteristics of cultural groups that can inform a culturally appropriate service delivery may include:

- language and religion (Interpreters or translation services should be used where required)
- individual or collective orientation of the family's cultural group

Education and Support

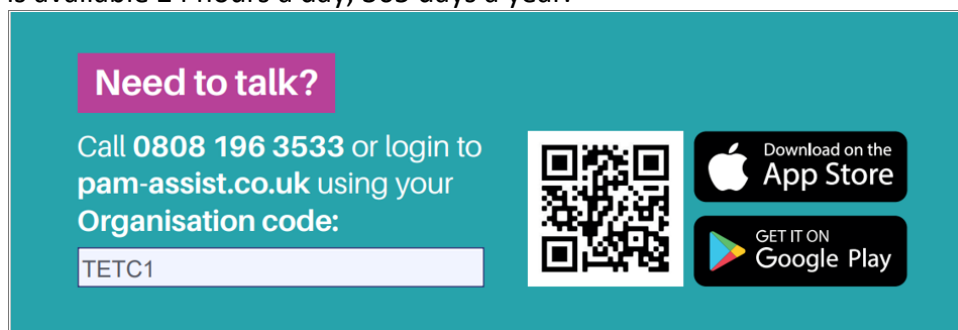
The Etc will approach self-harm by de-stigmatising mental health as a topic by delivering empathetic and sensitive education through tutorials, enrichment opportunities, welfare support and referrals to therapeutic support. It will promote self-help and challenge misconceptions about mental health.

Disclosures, Support and referrals

All staff within curriculum teams should be available to discuss any issues relating to self-harm. The Welfare and Safeguarding teams within Student Experience and Wellbeing are also able to offer a confidential support and advice service unless to do so would place an individual at significant risk of harm. In this scenario, College safeguarding procedures must be followed.

The Welfare and safeguarding team have a number of referral arrangements to support students to receive specialist support and guidance.

The PAM Wellbeing student assistance programme is available to all students within the College group. It provides a free, confidential helpline and digital platform on health and wellbeing that is available 24 hours a day, 365 days a year.



Possible signs of Self-harm

Potential indicators that a person is self-harming:

- Drug and/or alcohol misuse.
- Out of character behaviours.
- Frequent 'accidents' that result in physical injury.
- Keeping themselves fully covered even in hot weather.
- Not wanting to wear short sleeves or take off clothing for sports.
- Unexplained cuts, bruises, burns, usually on wrists, arms, thighs and chest.
- Unexplained blood stains on clothing or tissues.
- Signs that they have been pulling out their hair.
- Being withdrawn, anxious or depressed.
- Signs of low self-esteem, such as thinking they are not good enough.
- Talking about ending things or not wanting to go on.

N.B. It is important to recognise that none of these risk factors may appear to be present. Sometimes it is the outwardly happy, high-achieving person with a stable background who is suffering internally and hurting themselves in order to cope.

Supporting students who disclose self-harm

- Uncertainty in this area is common, and staff should adopt the following approach; where the young person is expressing suicidal thoughts and /or their mood is negative they should be treated as being at risk of suicide. Any communication of distress should be taken seriously.
- **Listening to young people** and trying to understand how life seems for the distressed person is the most important way of helping. Evidence shows that some teenagers may make a repeat suicide attempt when no one has really listened or where no help has been offered.
- Being heard and understood is clearly stated by young people as being the **most important and effective** way of helping them. When caring for people who repeatedly self-harm, professionals should be aware that the individual's reasons for self-harming may be different on each occasion and therefore each episode needs to be treated in its own right.
- Staff should provide a non-judgemental and confidential response; don't be influenced by personal emotions or by your own prejudice or bias.
- **STAFF SHOULD NOT REQUEST TO SEE SIGNS OF SELF-HARM.**
- DO NOT OFFER CONFIDENTIALITY, but say that the learner will be kept informed of any actions
- Explain that you will NEED TO SHARE INFORMATION with a member of the Safeguarding Team.

Appendix L – Drugs & Alcohol

Definitions

For the purpose of this policy references to ‘Drugs and Alcohol’ relate to illegal drugs, psychoactive (‘legal highs’ including THC vapes) or volatile substances, Alkyl nitrates (Poppers), prescribed medications outside of intended use/dosage, alcohol, other misuse/dependency related issues.

The definition of a drug given by the United Nations Office on Drugs and Crime is “a substance people take to change the way they feel, think or behave”.

Scope

The Policy applies to all students at the Etc group except NETA Training (which has its own Substance and Alcohol Misuse Policy (SAMP) with additional measures and protections relating to its operational functions). It takes in consideration statutory guidance from Keeping Children Safe in Education (2024).

It applies to any possession, use or supply of drugs at any Etc site, or College approved placement/employer defined as: anywhere on the premises at all times (up to and including any site boundaries and/or recreational areas), during offsite extra-curricular activities and on any College provided transport. The onus is on staff and students to report any concerns they may have or observe.

Where subcontractors have children or vulnerable adults it agrees to have a Drugs and Alcohol Policy that fully recognises its responsibilities to safeguard and promote the welfare of children and vulnerable adults. The Drug and Alcohol Policy must ensure the health and safety of students. It will detail its approach to drugs and alcohol education, support available and how it manages suspected drugs and alcohol misuse/possession. The subcontractor will ensure that all staff are familiar with the policy and consistent in its application.

All students can be at risk from drugs and alcohol, but it is important to consider that there are some students who may be particularly vulnerable to misuse.

Where subcontractors have children or vulnerable adults it must ensure that all staff are vigilant to the fact that people who harm use drugs or alcohol to disinhibit children which is part of their grooming behaviour. They must also be aware of using victim blaming language – this abuse is the responsibility of those who harm, and the focus should be on approaches to keep children and vulnerable adults safe.

The subcontractor will provide a copy of the Drug and Alcohol Policy to the College and make records relating to training around the Policy available to the College for audit when requested.

Approach

The Etc and Corporation do not condone any infringement of The Misuse of Drugs Act (1971). They require that firm action shall be taken against any individual or group contravening this legislation.

Drugs are a part of our everyday lives and most young people will, at some stage, use drugs for medicinal purposes. However, we now live in a society where young people face growing pressures to become involved in and experiment with controlled drugs and other legal substances such as alcohol and tobacco. Those who seek to cause harm to children may use drugs and alcohol to disinhibit children. The College group recognises its pastoral responsibilities in the general health, welfare and safeguarding of students and aims to reduce these pressures and educate students about the risks of involvement with drugs, where to seek help as well as to try to maintain an environment that is as free as we can make it of illegal or harmful substances.

Drugs & Alcohol education

Many students want drug education and particularly value the opportunity to explore attitudes and relate what they know and learn about drugs to their own life experiences. The aim of drug education will be to provide opportunities for students to develop their knowledge, understanding, skills and attitudes about drugs to help them make healthy and informed choices.

The College Group must accept that a large percentage of students are statistically likely to have already experimented with or used illegal recreational drugs. For these students a harm minimisation approach which aims to ensure students know where the dangers lie, and how they can be avoided, is more effective than a “Just say no” approach.

Colleges Group staff should never suggest that the abuse of alcohol or the use of illegal recreational drugs is condoned but should enable students to make informed choices about drugs, highlight the associated risks involved and inform students of appropriate support services.

The Colleges Group will use a variety of methods to educate students about the issues concerning drugs:

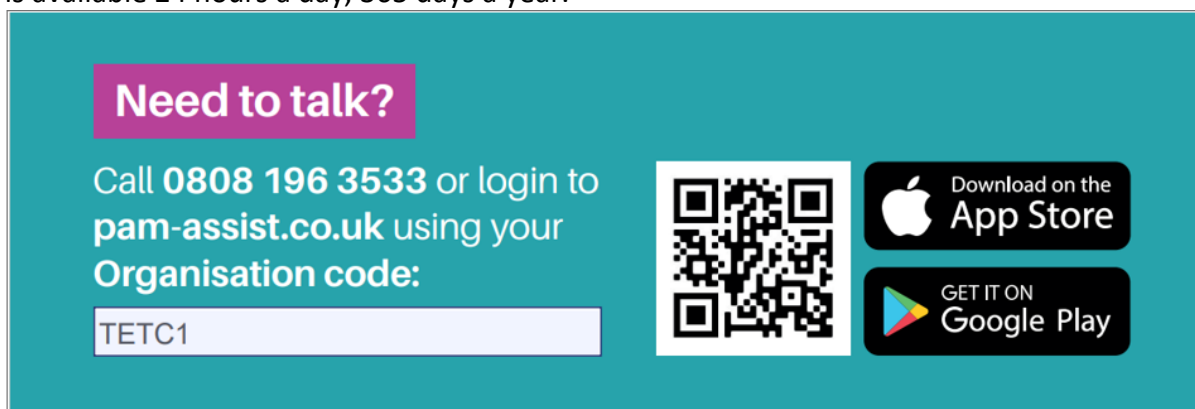
- Providing on-going access to information and advice, for example through displays throughout the Colleges Group sites, booklets and posters, access to resources and services of the VLE, Virtual Reality (VR) opportunities and signposting to appropriate online platforms.
- The tutorial system, where there will be the minimum of one session a year on drug-related issues which includes information on the local context and risks.
 - Promote the problematic risks associated with legal and illegal drug use related to vocational areas and professional life.
 - Enrichment activity around healthy lifestyles.
 - Bringing in external speakers to input into drug education.

Support and referrals

All staff within curriculum teams should be available to discuss any issues relating to drug and alcohol use. The Welfare and Safeguarding teams within Student Experience are also able to offer a confidential support and advice service unless to do so would place an individual at significant risk of harm. In this scenario, College safeguarding procedures must be followed.

The Welfare and safeguarding team have a number of referral arrangements to help students receive specialist support and guidance.

The PAM Wellbeing student assistance programme is available to all students within the College group. It provides a free, confidential helpline and digital platform on health and wellbeing that is available 24 hours a day, 365 days a year.

A teal banner for the PAM Wellbeing student assistance programme. On the left, a pink box contains the text 'Need to talk?'. Below this, white text reads 'Call 0808 196 3533 or login to pam-assist.co.uk using your Organisation code:'. A light blue box below the text contains the code 'TETC1'. To the right of the text is a QR code. Further right are two black buttons: the top one with the Apple logo and 'Download on the App Store', and the bottom one with the Google Play logo and 'GET IT ON Google Play'.

Action in the event of suspected Drugs or Alcohol Misuse

1. All students are made aware of college expectations with regards to Drugs and Alcohol during induction. They commit to following the student contract that establishes expected norms and patterns of behaviour. Possession, distribution or being under the influence of Drugs or Alcohol on site during college activities is prohibited. Where any student is suspected of any or all the above-mentioned prohibited activity the following action should be taken:
2. If a student is suspected to be intoxicated or under the influence of drugs whilst on Colleges Group premises staff must inform the Curriculum Manager, Alternative Provision Manager at Skills or at Bede, the Head of Faculty. If none of these staff are available, the duty manager should be contacted.
3. The priority must always be to ensure the safety of any student at risk from drugs and alcohol. This may be the individual(s) suspected of being under the influence or those at risk from their actions.
4. Once any risk has been managed, students that are suspected of being under the influence, having possession of or having distributed drugs or alcohol should be suspended while an investigation takes place and appropriate sanctions taken in line with the Relationships and Behaviour policy if required.
5. The safeguarding team must be notified of all incidents related to drugs and alcohol as soon as possible. They will also be able to give support and advice on whether the matter should be discussed with the Police.
6. For any student under the age of eighteen or 19+ with an EHCP, their next of kin should be notified of the incident as soon as reasonably possible when they suspect a student is under the influence of Drugs and Alcohol. Where contact cannot be made with the primary contact the 2nd contact should be called (where available).
7. For any child under 18, 19+ with an EHCP or a vulnerable adult who is suspected of being under the influence of drugs or alcohol, that the NOK is requested to collect them, arrange transport or consent to them travelling independently.
8. Or, if there is immediate risk to health or wellbeing, that the emergency services are called in line with college safeguarding policies

9. A suspension is then put in place pending the outcome of the college investigation. NOK should be notified for any student under the age of eighteen. For students over the age of eighteen, consent should be sought so that a wider network of support is available for the individual.
10. Any action taken as part of the Relationships and Behaviour Policy will take a holistic trauma, informed approach to the student's wellbeing.

Drugs searches and Confiscation

The College group reserves the right to request to investigate students' belongings if they have reason to suspect that they may possess drugs or alcohol. Refusal to comply to any request may result in a student being suspended while an investigation takes place and appropriate sanctions taken in line with the Relationships and Behaviour policy if required.

If a member of staff suspects that a student is in possession of drugs or alcohol, they must inform the Curriculum Manager, Alternative Provision Manager at Skills Academy or at Bede, the Head of Faculty. If none of these staff are available, the duty manager should be contacted. Two nominated members of staff can then find an appropriate room/space for the search and instruct the student to remove outer layer of clothing and 'turn out' their pockets or bag. **Staff members are not to physically search students' persons.** If the student refuses, the searcher will report directly to the Head of Department, or Deputy/Assistant Head of Sixth Form (Bede).

Trauma informed searching includes:

- Be aware that the student may have had previous distressing experiences of being searched
- Explaining clearly why the search is required, and make sure they understand what you have said.
- Remain calm. Even though somebody may be distressed and shouting – do not shout back - keep a low calm voice
- Keep a calm and reassuring manner and offer the student the opportunity to ask questions

A record must be made on Pro Monitor of:

- Why was the search conducted?
- Who authorised the search?
- What was searched?
- Who conducted the search?
- Place, date, time of the search
- What was found?
- Parent/carers is to be contacted and informed of the search/results
- If the student refuses to be searched, note why. Then call parents/ carers.
- Report must be made to safeguarding staff

If, during a search, the person carrying out the search finds any drugs or alcohol, a picture must be taken as evidence alongside the student ID card. The relevant manager should suspend the student(s) while an investigation takes place and appropriate sanctions taken in line with the Relationships and Behaviour policy if required.

Points 5, 9 & 10 should then be followed under section *Action in the event of suspected Drugs or Alcohol Misuse*

Disposal of Drugs, Alcohol and Paraphernalia

The Student Experience and Wellbeing Manager for the site must be contacted.

They will arrange for the safe removal, recording and storage (in labelled evidence bag) in a secure, locked storage area.

Staff are advised that it is not acceptable for them to remain in possession of any such substances for any period as to do so would constitute an offence under the Misuse of Drugs Act 1971.

The relevant Student Experience and Wellbeing Manager shall notify the Police without delay who will then collect the suspected drugs and then store or dispose of them in line with locally agreed protocols.

Students at risk

Whilst it is important to recognise that all students can be at risk from drugs and alcohol it is important to consider that there are some students who may be particularly vulnerable to misuse. All staff need to be vigilant to the fact that people who harm use drugs or alcohol to disinhibit children which is part of their grooming behaviour. They must also be aware of using victim blaming language – this abuse is the responsibility of those who harm, and the focus should be on approaches to keep children safe.

Vulnerable students may include:

Students who are looked after or who have recently left care

- Students who struggle to attend
- Students with severe special educational needs
- Students with mental health problems
- Students in contact with the criminal justice system
- Students who live in home environments where there is drug/alcohol misuse
- Students who are homeless
- Students that are exploited through trafficking and criminal networks
- Students who are affected by community violence
- Students who find it hard to engage with services
- Students who have been through recent trauma

All staff should take special care of these students to identify early signs of drug and/or alcohol misuse.

These signs might be:

- Changes in mood or outlook – may appear withdrawn/distant and/or erratic behaviour
- a sudden and rapid decline in attendance, performance, or punctuality at college
- deteriorating relationships with other students and staff
- borrowing or stealing money
- being unnecessarily secretive about actions and activities
- a sudden change of friends
- deterioration in personal hygiene and appearance.

If staff notice any of these signs, it is wise in the first instance not to jump to conclusions. They may have nothing to do with drugs and many of them can simply be symptomatic of adolescence.

However, they might also be signs of unhappiness for other reasons. If staff have any concerns, then they should always discuss them in the first instance with a member of the safeguarding team: it is better to be over-concerned than ignoring what may be a serious problem for the student's well-being.

It is the duty of all members of staff to inform the Student Experience & Wellbeing Manager for their site or the Director of Student Experience (DSL), if they believe that a student is actively at risk from drug and/or alcohol use/misuse. They will decide what actions should be taken in the interest of both the student and the College community.

Appendix M - Young Carers

Purpose

The Education Training Collective (Etc.) is committed to supporting students who have caring responsibilities. We recognise that young carers—students under the age of 25 providing unpaid care for a family member or friend—may face additional challenges that impact their education and wellbeing. Through our group of colleges and training centres, including Stockton Riverside College, Redcar and Cleveland College, NETA Training, Skills Academy, and Bede Sixth Form College, we aim to ensure that young carers are identified, respected, and fully supported throughout their educational journey.

Definition of a Young Carer

A young carer is someone under 25 who provides physical, emotional, or practical care to a family member or friend due to illness, disability, mental health condition, or substance misuse. Their responsibilities may include:

- Household management (cooking, cleaning, shopping)
- Personal care (bathing, dressing)
- Emotional support (listening, reassurance)
- Managing appointments or medication
- Supporting siblings or managing family finances

Aims

The Etc is committed to:

- Identifying and supporting young carers across all campuses and training sites
- Ensuring young carers have equitable access to education and personal development opportunities
- Promoting understanding among staff, students, and parents/guardians
- Providing clear procedures for disclosure and referral
- Working collaboratively with local services, including Stockton, Redcar and Cleveland Young Carers services, health professionals, and social care

Roles and Responsibilities

Group Leadership and Governors:

- Provide strategic oversight and champion support for young carers across the Etc.

Designated Young Carers Lead: Student Experience and Wellbeing Manager - Safeguarding

- Oversee implementation of the policy across the group
- Work closely with Student Experience and Wellbeing staff and curriculum staff
- Liaise with external agencies for additional support and referrals

Young Carer Champions:

The following staff members across the group are dedicated to supporting young carers and ensuring they receive the necessary support:

- Helen Challinor
- Katie Todd
- Christine Cook
- Natalie Brady

These individuals serve as the first point of contact for students with caring responsibilities at each college site. They are responsible for raising awareness, providing support, and liaising with other staff to ensure the needs of young carers are met.

Teaching and Support Staff:

- Be aware of the signs a student may be a young carer
- Foster an inclusive, supportive learning environment
- Make reasonable adjustments and refer to appropriate support services

Students:

- Respect and support peers who are carers
- Encourage disclosure where a peer may need support

Identification and Disclosure

Young carers may not always self-identify. To encourage disclosure:

- Young carer awareness will be built into induction, tutorials, and promotional materials
- Students will have regular opportunities to disclose through 1-to-1s, progress reviews, and pastoral meetings
- Disclosures will be treated with empathy and confidentiality

Support for Young Carers

Support available may include:

- Flexible timetabling, deadline extensions, part-time study options, placement hours including caring responsibility hours
- Access to counselling and mental health support
- Priority access to bursaries or hardship funds where financial pressure exists
- Pastoral support from named Young Carers Champions or Student Experience and Wellbeing teams
- Support with career planning, higher education access, and work experience
- Liaison with external agencies, including local authority Young Carers Services

Each case will be reviewed individually, and a support plan may be put in place with consent from the student.

Staff Training and Awareness**Training for Staff:**

Etc. is committed to raising awareness of young carers and ensuring that staff are equipped to provide appropriate support. All staff (academic, support, and administrative) will receive information on identifying and supporting young carers.

This will include:

- Understanding the Role of a Young Carer: Staff will recognise the signs that a student may have caring responsibilities and the potential challenges these may pose to their learning and wellbeing.
- Responding to Disclosure: Staff will know how to respond sensitively and appropriately when a student discloses that they are a young carer, maintaining confidentiality and offering support.

- **Signposting to Support:** Staff will be made aware of the resources available to young carers both within the college (e.g., the Young Carer Champions) and externally (e.g., local young carers services, mental health resources, and financial support).
 - **Reasonable Adjustments and Inclusivity:** Staff will implement reasonable adjustments for young carers, including flexible timetables, extended deadlines, and access to additional learning support.
 - **Safeguarding Considerations:** All staff will understand the potential safeguarding issues affecting young carers, ensuring that any concerns are reported and managed according to the college's safeguarding procedures.
- Ongoing Training and Development:
- Training on supporting young carers will be a part of the annual professional development program for all staff.
 - New staff will receive training on this policy as part of their induction process.
- Annual Awareness Campaign:
- There will be campaigns to raise awareness of young carers across all sites, featuring information sessions, posters, and opportunities for students to disclose their caring responsibilities in a supportive environment.

Informing Parents and Guardians about the Role of Young Carers

We recognize the importance of engaging with parents and guardians to ensure that young carers are supported both at home and in college. To achieve this, we will:

- **Provide Information:** Information about the role of young carers and available support will be included in parent/guardian communications.
- **Offer Support and Guidance:** Parents and guardians will be encouraged via information on college websites to contact relevant staff if they believe their child, is a young carer.
- **Encourage Dialogue:** Parents and guardians will be encouraged to have open conversations with their child about their caring role, ensuring that the child's needs are fully understood by both the family and the college.

Parents and guardians will be made aware that the college respects the confidentiality of their child and that information will only be shared with consent, except where there are safeguarding concerns.

Safeguarding

The Etc. Group recognises that young carers may be more vulnerable to safeguarding risks. All safeguarding concerns will be managed according to the Group's Safeguarding and Child Protection Policy, and staff will follow established reporting procedures.

Confidentiality and Information Sharing

All disclosures will be handled with sensitivity. Information will be shared only on a need-to-know basis, and with the student's informed consent—except where there are safeguarding concerns.

Monitoring and Review

This policy will be reviewed annually by the Designated Young Carers Lead in consultation with:

- Young carers within the Group
- Student Experience and Wellbeing staff

- Equality Diversity Inclusion and Belonging (EDIB) committee

Progress will be reported to the Senior Leadership Team and used to continuously improve the support the offer.

Appendix N - Conviction Disclosure & Safeguarding Risk Assessment Panels

Purpose

To support the application of the Admissions Policy specifically in relation to the assessment of risk posed by unspent criminal convictions. It is intended to promote fair and proportionate decision-making while ensuring the safety and well-being of the learning community.

This framework is intended as a guide; each case should be considered individually - considering all relevant factors and available information.

Statement of action

Principles:

Proportionality: Decisions should be balanced and proportionate to the risk posed, minimising adverse impact on individuals with past convictions whilst safeguarding others.

Fairness and transparency: With learners having the right to understand the information used in the decision-making process and enabled to challenge unfair outcomes.

Individualised approach: With the specific circumstances of each applicant considered carefully, including the nature and severity of the offence, time since conviction, rehabilitation efforts and the risk of re-offending – all of which should be informed by the relevant authorities.

Rehabilitation of Offenders Act (ROA) Status:

Spent Convictions: Under ROA, individuals are not obliged to disclose spent convictions for most purposes, including education. However, if spent convictions are disclosed, colleges may consider them in exceptional circumstances if relevant to risk assessment, e.g., safeguarding concerns (see Admissions Policy).

Unspent Convictions: Colleges can consider unspent convictions in assessing risk, but must do so proportionally and fairly, taking ROA eligibility timelines into account.

Cautions: A decision is to be made (April 2024) regarding the request for caution information.

Linked Policies

Admissions Policy

Location and Access

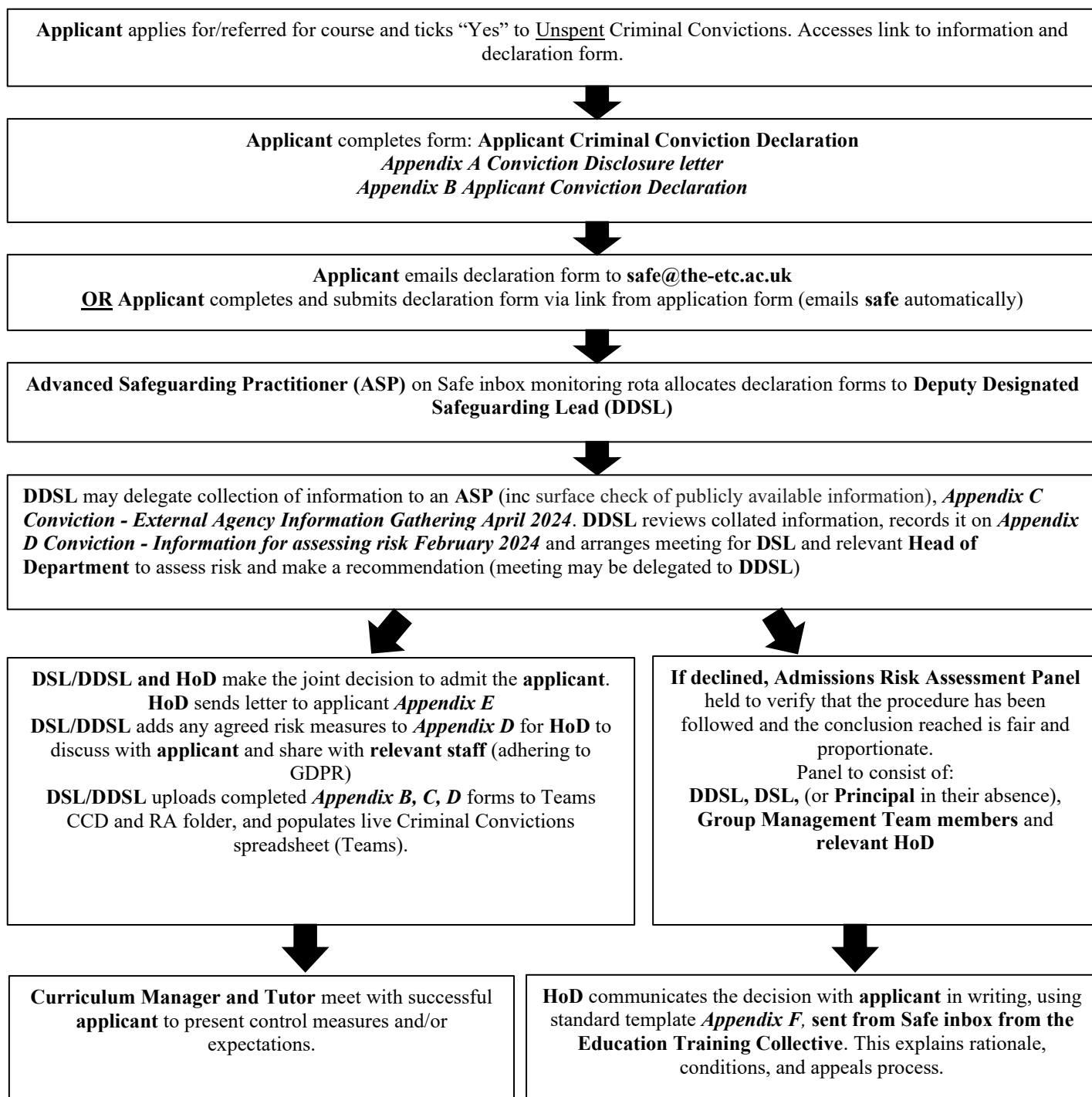
Roles and responsibilities: The Director of Student Experience and Wellbeing is the Designated Lead for Safeguarding (DSL). Student Experience and Wellbeing Managers are Deputy Designated Safeguarding Leads (DDSL).

Framework summary

The Convictions Flowchart below outlines in brief the procedure to be followed along with the roles and responsibilities of key personnel.

Greater detail regarding each stage of the process, with reference to the Admissions Policy, is contained within the Framework detail section of this document.

NO APPLICANT IS TO BE ENROLLED ON COURSES UNTIL THE ASSESSMENT PROCESS IS COMPLETE.
THIS SHOULD BE CONSIDERED WHEN ARRANGING/DISCUSSING COURSE START DATES



References to the Admissions Policy

4.2: Applicants for courses that will involve a placement working with children and/or vulnerable adults are required to disclose their full offending history and must also apply for DBS (Disclosure and Barring Service) disclosure. This will be made known to applicants as part of the application process, with a link from the enrolment form to a standard form for applicants to provide details of any offence/s and the circumstances arising at the time/s if appropriate.

4.3 All applicants are required to confirm whether they have any unspent criminal convictions on enrolment forms. Applicants for courses that will involve a placement working with children and/or vulnerable adults are required to confirm whether they have any criminal convictions that have not been filtered under the Rehabilitation of Offenders (ROA) Act 1974 (Exceptions) Order 1975 (as amended in 2014). Applicants who declare they have convictions will complete a standard form to provide details of the offence/s, the date the offence/s was committed and the circumstances arising at the time/s.

4.4 Applicants will also be provided with a letter via a link from the enrolment form that explains why the Group is asking for the information and the risk assessment process that will be undertaken.

Disclosures provided in hard copy format will be treated confidentially and placed in a sealed envelope and passed directly to an Advanced Safeguarding Practitioner who will log the information before passing it for review to the Group Designated Lead for Safeguarding.

See flowchart above for specific roles and responsibilities.

Step 1: Gather Information:

- Obtain applicant's written disclosure of unspent criminal convictions.
- Gather further details about the offence(s), sentence, rehabilitation efforts, risk assessments (if available) from the applicant, if necessary
- Verify information with relevant authorities (for example, Probation Service).
- Undertake a surface check of publicly available information (as per Keeping Children Safe in Education KCSIE guidance for recruitment of staff and adherence to GDPR)

Step 2: Assess Risk:

When assessing convictions as part of the risk assessment process, several factors need to be taken into consideration including:

- Spent convictions (if disclosed)
- Pending convictions (if disclosed)
- Placement on the Violent and Sex Offender Register (ViSOR) in line with the Rehabilitation of the Offenders Act
- Date conviction/s occurred
- Offending history
- Substance misuse
- Mental Health
- Circumstances surrounding conviction
- Sentence/s
- Rehabilitation
- Course appropriateness e.g., timetable, duration, health & safety factors, work placement etc.
- Engagement with external agencies
- Advice from specialist agencies i.e., Probation, YOS
- References e.g., employers, education etc.
- DBS requirement
- Risk of re-offending

- Bail restrictions, tag/curfew, other orders e.g., Harassment Order
- Organised Crime Groups/Street Gangs (OCG)
- Criminal exploitation
- Multi Agency Public Protection Arrangements (MAPPA)

(This list is not exhaustive)

Nature and Severity of Offence:

- **High Risk:**
 - Violent offences, (Grievous bodily harm (GBH), Actual bodily harm, (ABH),
 - Sexual offences
 - Drug offences, (supply)
 - Child abuse and exploitation
 - Serious harm to others (including arson)
 - In possession of a bladed article
 - Terrorism-related offences
 - Any offence resulting in a custodial sentence
- **Medium Risk:**
 - Dishonesty offences (fraud, theft)
 - Drug possession (personal use)
 - Vandalism or damage to property
 - Public order offences (disorderly conduct, harassment)
- **Low Risk:**
 - Minor offences (petty theft, nuisance)
 - Speeding offence

Time Since Conviction:

- Recent convictions (< 5 years) generally pose a higher risk than older ones. However, rehabilitation efforts can mitigate this.

Rehabilitation Efforts:

- Evidence of positive steps like community service, counselling, qualifications, or employment can demonstrate reduced risk.
- Consider the timeframe and relevance of rehabilitation efforts to the offence and course content.

Contextual Factors:

- Consider the specific course, learning environment, potential interaction with vulnerable individuals, and potential for harm related to the offence.
- Balance the applicant's right to education with the safety and well-being of the college community.

Step 3: Make a Recommendation:

The Designated Lead for Safeguarding (or delegated Deputy Designated Safeguarding Lead), in conjunction with the relevant Head of Department, will review the disclosure and make one of the following judgements:

Approved: The offence/s disclosed is judged to have no implications for safeguarding of the College's communities or others in any placement the learner may undertake as part of their programme

- **Approved with restrictions/Conduct Action Plan:** The offence/s disclosed may have implications for safeguarding of the College community or others in any placement the learner may undertake as part of their programme, however, with careful management and a comprehensive risk assessment, shared with relevant personnel (whilst adhering to GDPR), these risks are low
- **Approved for this course only:** The offence/s may be classed as a significant (e.g. sexual offences and those involving violence, terrorism and the supply of drugs) risk for safeguarding of the College community, however, the course allows for effective safeguards i.e. the management of learners, the experience of the staff, staffing levels, online access managed to prevent contact with other learners. *NB This would only be an option in a small number of circumstances and used with extreme caution.*
- **Approved with Careers Guidance:** The offence/s disclosed are judged to have no implications for safeguarding of the College community, however, there may be some placement considerations or possible implications when applying for jobs in the relevant sector (e.g. due to issues such as a history of theft).
- **Decline:** The offence/s disclosed is significant (e.g. sexual offences and those involving violence, terrorism and the supply of drugs) and is judged to have implications for safeguarding of the College community or others in any placement the learner may undertake as part of their programme

Note - The ultimate decision in relation to any applicant will be made by the DSL, or delegated DDSL, and relevant Head of Department that the applicant is applying to study with.

4.7: Where an 'Approved with Careers Guidance' rating has been applied, the applicant/learner will be informed that they can progress to the next stage of the application/enrolment stage as appropriate. They will be provided with appropriate IAG by the course team and the relevant head of department will review, and may amend, planned placements or transfer to another more suitable course.

4.8 Where a 'Decline' rating has been applied, the Group Designated Lead for Safeguarding, or the Principal, in the absence of the Group Designated Lead for Safeguarding, will invoke a Risk Assessment Panel. The panel will involve appropriate members of the Group management team, the relevant Head of Department (or equivalent post holder) and the Group Designated Lead for Safeguarding who will verify that the procedure has been followed and that the conclusion reached is fair and proportionate. Written records of the panel and outcomes will be maintained by the Group Designated Lead for Safeguarding. The applicant/learner will be informed of the outcome of the panel, by letter.

Step 4: Communication and Support:

- Clearly communicate the decision to the applicant using standard letter template, explaining the rationale, conditions, and any appeals process.
- Offer support services and resources for rehabilitation, reintegration, and understanding ROA rights, if appropriate.

Data Protection

'Personal data means any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person' Art 4 General Data Protection Regulation (GDPR)

The College will comply with the Data Protection Act 2018 and General Data Protection Regulation (GDPR) by ensuring that personal data collected in relation to this policy is: -

- Collected and processed lawfully, fairly, and transparently for only specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes.
- Adequate, updated, and relevant and not excessive for the purposes it was collected.
- Processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction, or damage, using appropriate technical or organisational measures. Including not being transferred to a country outside the European Economic Area unless that country has equivalent levels of protection for personal data.
- Kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed.

The Data Protection Act and GDPR are not barriers to disclosure* but place a duty on organisations to disclose personal information responsibly and in line with the law. The College's default position is not to disclose personal information unless the legislation permits it. This duty applies to manual records as well as information held electronically.

**'disclosure' means disclosure to internal agencies (departments and individuals) as well as external agents*

The Privacy Statement on our website states the following:

We may share personal information with a range of third parties. The categories of which are as follows:

- Local authorities (and their associated services)
- Schools (to support transitions)
- Employment agencies (to facilitate non-salaried staff)
- Employers (and potential employers, re: references, work experience, placements, etc)
- ESFA (funding body – attendance, achievement, actual destinations, etc – legal duty)
- The Police (prevention and detection of crime, investigations)
- DBS and background check agencies (for safeguarding)
- Exam boards (certification, results, access arrangements)
- Safeguarding and Security service / software providers
- Other agencies where the sharing is in the best interests of the data subject

Information which must be treated as confidential includes the names and addresses of students and any other information about them which is not publicly known, i.e., “personal data”. Accordingly, to ensure that the College does not breach its duty, no information, even if it only exists in printed form, should be disclosed unless all the relevant procedures in relation to information disclosure have been followed.

There may be occasion where the College is obliged to disclose information, notwithstanding that the learner has refused consent:

- Where the learner’s behaviour threatens their safety or safeguarding, and that of others.
- *Or* where the college would be liable to civil or criminal liability for failure to disclose.

Appendices

Appendix A - Conviction Disclosure letter

Please note that this should be on site specific branded letterhead

Dear applicant,

You have indicated on your application that you have, or have pending, a criminal conviction or caution.

Having a criminal record or a pending prosecution will not necessarily bar you from a place at college. We wish to provide every opportunity for you to access an appropriate course at the College.

We must balance this with our legal duty to provide a safe, secure environment for all students, staff and visitors, which is why we need to make this assessment.

If you fail to disclose any relevant information, then your offer of a place or enrolment on the course may be withdrawn.

Disclosures will be treated confidentially and passed directly to the appropriate member of the safeguarding team who will log the information before passing it for review to the Group Designated Lead for Safeguarding

The Designated Safeguarding Lead and Head of Department will decide if your criminal record is relevant to your course and to you being at the College. They will review the disclosure and any additional information from relevant agency such as Probation, and will make one of the following judgements:

- Approved – You can continue with your application.
- Approved with restrictions/Conduct Action Plan.
- Approved for this course only.
- Approved with Careers Guidance.
- Decline - We cannot offer you a place at this time.
-

Please note that the details requested are necessary for us to complete a mandatory risk assessment. Information provided will be treated as strictly confidential.

Please read the information on the Conviction Disclosure Form regarding convictions that you are required to tell us about.

If you are not satisfied with the decision, an appeal must be made in writing and must be received by Etc. within 15 working days. The appeal should be sent to 'Appeals' at the Etc. address, Harvard Avenue, Thornaby, Stockton on Tees TS17 6FB or by email to appeals@the-etc.ac.uk. Appeals are heard by a member of the Senior Management Team who will consider your case and confirm their decision to you in writing.

Thank you.

Yours faithfully,

Appendix B - Conviction Disclosure Form



To be completed by applicant and sent to: safe@the-etc.ac.uk

First Name:		Surname:		Date of Birth:	
Address:					
Contact Telephone Number:			Course Applied For/Studying:		
Campus:			Course Start Date:		
Pending/Offence/Caution Name	Date of offence	Convicted	Details		Sentence
<i>Example - Burglary</i>	<i>21/07/2016</i>	<i>Yes</i>	<i>Burglary of dwelling</i>		<i>3 years prison</i>
Are you working with any professionals in connection with any of the above?			Youth Offending Team		Yes / No
			Probation Service		Yes /No
			Other organisation		Yes / No
If yes please give contact details:		Name of worker: Telephone number: Email address:			
I give my permission for the Youth Offending Team, Probation Service or other organisation to disclose information as requested by the College (Please tick)			Yes		No
Student Signature:			Date:		
Or Verbal consent given over the phone:-					

If an offence is spent, you do not need to declare it.

Custodial sentence includes a sentence of imprisonment both an immediate custodial sentence and a suspended sentence), a sentence of detention in a young offender institution, a sentence of detention under section 91 of the Powers of Criminal Courts (Sentencing) Act 2000, a detention and training order, a sentence of youth custody, a sentence of corrective training and a sentence of Borstal training.

A community order, youth rehabilitation order or relevant order *which has no specified end date* has a default rehabilitation period of two years from the date of conviction or from the time the disposal is administered.

For custodial sentences, the rehabilitation period will start from the end of the total sentence imposed by the court (including the licence period) – not from the time served in custody (i.e. the day of release). The rehabilitation period includes an additional 'buffer period' that runs from the end of the sentence. This 'buffer period' is determined by the length of total sentence imposed. The 'buffer periods are halved for those aged under 18 at the date of conviction.

General Data Protection Regulation (GDPR) - We will gather specific personal information about you (the student) We will not use the data provided for any other purpose other than to make a decision about your eligibility to study at The ETC. and then to notify you about the decision. This data provided will be retained for the year that you enrol + 6 years.

Declaration of criminal convictions and pending convictions – Please declare all unspent criminal convictions or cautions, pending criminal convictions, or recent arrests, particularly if there are bail conditions, which could affect your ability to be around children or young people. Please see the reverse of this form for details of spent convictions.

The rehabilitation periods for custodial sentences (including suspended custodial sentences) are shown in Table A below:

Sentence/disposal	Buffer period for adults (18 and over at the time of conviction or the time the disposal is administered). This applies from the <u>end</u> date of the sentence (including the licence period).	Buffer period for young people (under 18 at the time of conviction or the time the disposal is administered). This applies from the <u>end</u> date of the sentence (including the licence period).
Imprisonment or detention in a young offender institution for over 48 months (4 years) following a conviction for any serious violent, sexual, or terrorist offences listed in Schedule 18 of the Sentencing Act 2020, or a public protection sentence (of any length)	Never spent	Never spent
Imprisonment or detention in a young offender institution for over 48 months (4 years)	7 years	3½ years
Imprisonment or detention in a young offender institution for over 12 months (1 year) and up to and including 48 months (4 years)	4 years	2 years
Imprisonment or detention in a young offender institution for 12 months (1 year) or less	1 year	6 months
Sentence/disposal	Rehabilitation period for adults (18 and over at the time of conviction or the time the disposal is administered).	Rehabilitation period for young people (under 18 at the time of conviction or the time the disposal is administered).
Fine	1 year	6 months
Community order or youth rehabilitation order	Period of the order	Period of the order
Conditional discharge order	Period of the order	Period of the order
Absolute discharge	None	None
Conditional caution and youth conditional caution	3 months or when the caution ceases to have effect if earlier	3 months
Simple caution, youth caution	Spent immediately	Spent immediately
Compensation order	On the discharge of the order (i.e. when it is paid in full)	On the discharge of the order (i.e. when it is paid in full)
Binding over order	Period of the order	Period of the order
Engagement and support order	Period of the order	Period of the order
Endorsements	5 years	2 ½ years
Hospital order/interim hospital order	Period of the order	Period of the order
Referral order	Period of the order	Period of the order
Reparation order	'Spent' Immediately	'Spent' Immediately
Remand (Home)	Period of the order	Period of the order
Supervision order	Period of the order	Period of the order
Relevant order	Period of the order	Period of the order

Appendix C - Criminal Conviction Disclosure – external agency information request



The below applicant has applied for a college place with the Education Training Collective and has declared on their application form that they have a **criminal conviction**.

In response to this declaration a Risk Assessment procedure has been implemented, the initial stage involving a request for further information from external agencies i.e. Police, Probation, Prison Service and Social Care (*this list is not exhaustive*).

The applicant has permitted for a request to be processed and has provided your contact details.

The information you provide will support the application of the Admissions Policy, specifically in relation to the assessment of risk posed by unspent criminal convictions. Our Decision-Making Framework is intended to promote fair and proportionate decision-making, whilst ensuring the safety and well-being of the learning community, and is conducted with reference to the following principles:

Proportionality: Decisions will be balanced and proportionate to the risk posed, minimising adverse impact on individuals with past convictions whilst safeguarding others.

Fairness and transparency: With learners having the right to understand the information used in the decision-making process and enabled to challenge unfair outcomes.

Individualised approach: With the specific circumstances of each applicant considered carefully, including the nature and severity of the offence, time since conviction, rehabilitation efforts and the risk of re-offending – all of which should be informed by the relevant authorities.

Our process is conducted with reference to the **Rehabilitation of Offenders Act (ROA):**

Spent Convictions: Under ROA, individuals are not obliged to disclose spent convictions for most purposes, including education. However, if spent convictions are disclosed, colleges may consider them in exceptional circumstances if relevant to risk assessment, e.g., safeguarding concerns (see Admissions Policy).

Unspent Convictions: Colleges can consider unspent convictions in assessing risk, but must do so proportionally and fairly, taking ROA eligibility timelines into account.

All information will be processed and stored with reference and adherence to GDPR.

Please note that the application for a college place cannot be processed until information has been received from all relevant external parties and your timely response will be much appreciated.

OFFICE USE:			
Applicant or Student Name		Date of Birth	
Course Applied For		College	
Disclosure made by applicant:			
Advanced Safeguarding Practitioner requesting information	Name: Contact info:	Date information requested	
INFORMATION PROVIDED BY EXTERNAL AGENCY			
Person providing information	Name: Job title: Contact details:	Date information provided	
Please answer all questions below			
	YES	NO	
Is the disclosure made by the applicant accurate?			
Does the applicant have any charges pending, criminal convictions, cautions (inc. verbal) reprimands final warnings bind over orders?			
Date of conviction			
For the purposes of the Rehabilitation of Offenders Act 1974, is the conviction (if applicable) 'spent'?			
Are bail restrictions, tag/curfew, other orders e.g., Harassment Order in place?			
Are Multi Agency Public Protection Arrangements (MAPPA) in place?			
Is there a history of offending?			
Has the applicant been placed on the Violent and Sex Offender Register (ViSOR) in line with the Rehabilitation of the Offenders Act?			
Has the applicant been involved with Organised Crime Groups/Street Gangs (OCG)			
Is the applicant at risk of criminal exploitation?			
Is there a high risk of the applicant re-offending?			
Has the applicant engaged positively with external agencies?			
Is there evidence of substance misuse?			
Does the applicant have difficulties with mental health?			
Do you consider the college course to be appropriate for the applicant?			
Does the applicant pose a risk to members of the college community?			
Should this applicant have unrestricted access to campus? If YES, please state below why you feel they should have unrestricted access. Please note that we may have students from 14 years of age and vulnerable adults on campus.			

Should this applicant have unrestricted access to the internet?		
Does the conviction/pending conviction relate to offences below?	YES	NO
Sexual or violent		
Drug related		
Arson		
Children or vulnerable adults		
Extremist behaviour		
Involve weapon or bladed article		
Relevant Notes i.e. circumstances surrounding conviction, sentence, rehabilitation:		
Further suggested actions to manage risk:		
Recommendation:		✓
Admit the applicant		
Admit the applicant subject to agreed contract of conduct/other restrictions		
Approved for this course only, future courses would require further consideration		
Do not approve due to the risks presented to the institution RE: safeguarding		

OFFICE USE:	Name	Date
Information received by		
Information sent to		

Appendix D - CONVICTION DISCLOSURE Information for assessing risk

Applicant or Student Name		Date of Birth		Date of Assessment	
Course Applied For					
SEND	If SEND, SEND staff need to be involved with the case. Does the student have additional needs? Y / N Does the student have an EHCP? Y / N				
Disclosure/Issue:					
		YES		NO	
Please answer all questions below					
Does the applicant have any charges pending, criminal convictions, cautions (inc. verbal) reprimands final warnings bind over orders?					
For the purposes of the Rehabilitation of Offenders Act 1974, is the conviction (if applicable) 'spent'?					
Has the applicant been sent and completed a disclosure form?					
Does the disclosure directly affect course application/Job Outcome?					
Does the disclosure relate to offences below?					
• Sexual or violent					
• Drug related					
• Arson					
• Children or vulnerable adults					
• Extremist behaviour					
• Involve weapon or bladed article					
Previous or Excluded Students		Yes		NO	
Has the learner been excluded previously?					
Has the learner had previous misconduct history?					
Relevant Notes:					
Statements					
Have statements been received from:		Yes		No	
• Learner					
• Parent					
• Carer					
• Probation Officer, Youth Offending Team.					
• Other – please state		Name:		Agency:	
Relevant Notes:					

Information shared by learner, parent or carer:

Information shared by Worker (may include information below)

Spent convictions

Placement on the Violent and Sex Offender Register (ViSOR) in line with the Rehabilitation of the Offenders Act

Date conviction/s occurred

Offending history

Substance misuse

Mental Health

Circumstances surrounding conviction

Sentence/s

Rehabilitation

Course appropriateness e.g., timetable, duration, health & safety factors, work placement etc.

Fitness to practise

Engagement with external agencies

Advice from specialist agencies i.e., Probation, YOS

References e.g., employers, education etc.

DBS requirement

Risk of re-offending

Bail restrictions, tag/curfew, other orders e.g., Harassment Order

Organised Crime Groups/Street Gangs (OCG)

Criminal exploitation

Multi Agency Public Protection Arrangements (MAPPA)

DBS requirement

Name of worker:

Role:

Service:

Contact Details:

RISK ASSESSMENT DECISION MAKERS

This must be Designated Safeguarding Lead and Head of Department

NAME:

NAME:

DSL

Head of Department

Recommended Actions to Reduce Risk	Yes	No
1. Restricted Campus Access (state below)		
2. Restricted Internet Use (state below)		
3. Other (state below)		
Further Actions to Manage Risk e.g. Learning Support, Welfare Check In, Careers Guidance from		

course team.
Summary of any Documents Reviewed by Decision Makers.

Decisions:	✓
Approved: Admit the applicant/continue on programme on the basis of the evidence presented	
Approved with restrictions: Admit the applicant subject to agreed contract of conduct/other restrictions as below	
Admit the applicant with Careers guidance from Curriculum area	
Approved for this course only, future courses would require further consideration	
Decline: Recommend continued exclusion or non-admittance due to the risks presented to the institution RE: safeguarding PANEL TO BE ARRANGED	
Actions: Outcome letter if successful Panel to be arranged if unsuccessful	

Actions	Yes	No
Outcome Letter to be sent		

	Name	Date
Designated Person: Safeguarding		
Curriculum		

Appeals must be made in writing and must be received by Etc. within 15 working days.

The appeal should be sent to 'Appeals' at the Etc. address Harvard Avenue, Thornaby, Stockton on Tees TS17 6FB or by email to appeals@the-etc.ac.uk.

Appeals will be heard by a member of the Senior Management Team, usually the College Principal, who will consider each individual case and confirm their decision to the applicant or learner in writing.

Appendix E - Assessing Risk from Unspent Criminal Convictions

Successful application letter (Please note that this should be on site specific branded letterhead)

Dear (name of applicant),

I am pleased to inform you that your application to undertake (insert name of course) at (insert name of college) has been successful.

In response to the Criminal Conviction Declaration form submitted as part of your application a Risk Assessment meeting was held on (insert date) when our Decision-Making Framework for Assessing Risk from Unspent Criminal Convictions was implemented by both Safeguarding and Curriculum Managers. They discussed in depth the content of your disclosure, along with information obtained from (insert probation / prison etc), in order to assess risk and make a well-informed decision as to whether your application could be approved.

The result of today's meeting was an agreement to support your application.

Due to the evidence presented, the offer of a place will be granted with the following conditions:

- (Insert whether applicant will have unlimited / limited access to IT, appropriate to an educational setting to complete any required course work).
- (Insert whether access would be limited/restricted away from site).
- (Insert any other conditions agreed at the meeting)
- Throughout the duration of the course, you will have access to Welfare Support and may be supported, if appropriate, by the Student Support & Wellbeing team should you wish to self-refer.

Please do not hesitate to contact either me (insert Head of Dept name and role) or (insert Course Leader name and role) should you require anything further at this stage.

We look forward to welcoming you into the Education Training Collective and wish you success with your course.

Yours sincerely,

Name

Title (Insert Head of Dept)

Appendix F - Assessing Risk from Unspent Criminal Convictions

Unsuccessful application letter (Please note that this should be on site specific branded letterhead)

Dear (name of applicant),

In response to the Criminal Conviction Declaration form submitted as part of your application for a place on (insert name of course) at (insert name of college), our Decision-Making Framework for Assessing Risk from Unspent Criminal Convictions has been implemented.

I regret to inform you that the College has declined your application.

The college has a legal duty to provide a safe, secure environment for all students, staff and visitors, with the Decision-Making Framework in place to support the application of the Admissions Policy specifically in relation to the assessment of risk posed by unspent criminal convictions. It is intended to promote fair and proportionate decision-making whilst ensuring the safety and well-being of the learning community.

The principles of this process are as follows:

- Proportionality: Decisions should be balanced and proportionate to the risk posed, minimising adverse impact on individuals with past convictions whilst safeguarding others.
- Fairness and transparency: With learners having the right to understand the information used in the decision-making process and enabled to challenge unfair outcomes.
- Individualised approach: With the specific circumstances of each applicant considered carefully, including the nature and severity of the offence, time since conviction, rehabilitation efforts and the risk of re-offending – all of which should be informed by the relevant authorities.

Due to the nature of the unspent conviction, you disclosed and additional information obtained from (insert external agency – police / probation etc)., it was deemed necessary to request that an Admissions Risk Assessment Panel be convened to discuss your declaration.

The Panel discussed in depth, and considered objectively, your conviction to assess risk and make a well-informed decision as to whether your application could be approved.

Due to the evidence presented and completion of a Risk Assessment, the nature of your unspent conviction is deemed to be of High Risk. The Panel made the decision, therefore, not to support your application to undertake (insert name of course) at (insert name of college).

I recognise that the decision of the Admissions Risk Assessment Panel will be disappointing and am obliged to inform you of your right to appeal this decision. Appeals must be made in writing and received by Etc. within 15 working days of receipt of this letter.

The appeal should be sent to 'Appeals' at the Etc. address Harvard Avenue, Thornaby, Stockton on Tees TS17 6FB or by email to appeals@the-etc.ac.uk.

Appeals are heard by a member of the Senior Management Team who will consider your case and confirm their decision to you in writing.

Yours sincerely,

Education Training Collective

Appendix O - College Arrangements for Safeguarding Training

Purpose and content

The purpose of this appendix of the College Safeguarding Policy is to provide a clear set of guidelines to learners, their parent/carers; and staff and other workers within the College community; together with wider stakeholders regarding how the College will ensure staff are trained in safeguarding by setting out the required mandatory training for different groups and the actions to be taken in the event of non-compliance.

The College Safeguarding Policy has been developed in line with statutory guidance and the locally agreed inter-agency procedures put in place by the Tees Safeguarding Children Partnership (Hartlepool, Stockton, Middlesbrough & Redcar) and the [Tees wide Safeguarding Adults Board](#). The policy applies to all learners and all staff (including agency and hourly paid staff) irrespective of anyone's position or role in the College, together with Governors and any workers who are at the College on a voluntary or placement basis.

Please note that the term 'College' is used throughout this appendix, as a generic term that encompasses all organisations within the wider College group, namely Stockton Riverside College, Redcar & Cleveland College, NETA Training Group, Bede Sixth Form College and Inner Summit.

Mandatory Training

Mandatory training is completed when employees, agency workers, self-employed contractors, volunteers and placement students join the college. The following training modules are required to be completed:

- Annual Safeguarding and Prevent Update
- Sexual Violence and Sexual Harassment
- Home Office Prevent Training
- Empowering Workplace Safety
- Equality and Diversity

Additional mandatory training is also required for employees in certain roles:

- Safer Recruitment Training (Only employees with line management responsibilities are required to complete this)
- Level 3 Designated Safeguarding Lead Training (applies to Student Experience and Wellbeing Manager, and Director of Student Experience and Wellbeing).

Mandatory Training Frequency

The below timescales indicate the frequency in which each mandatory training module should be completed by employees:

- Safeguarding and Prevent Update: Updated and completed annually at the start of each academic year in line with KCSIE updates.
- Sexual Violence and Sexual Harassment Training: Completed at induction
- Home Office Prevent Training: Completed at Induction
- Empowering Workplace Safety: 3 yearly
- Equality and Diversity: 3 yearly
- Safer Recruitment: 3 yearly
- Level 3 Safeguarding Lead: 2 yearly

Mandatory Training Completion and Monitoring

It is expected that all new starters of the College, complete their Safeguarding and Prevent training on their first day of work or volunteering. All other mandatory training modules should be completed as soon as possible, but no later than 14 days from a start date.

Employees are asked to send completed certificates for Home Office Prevent Training, and Level 3 Safeguarding Lead training through to the HR Department to be logged and marked as completed. HR will be notified of completion of all other modules.

Mandatory Training completion is RAG rated, green 1-14 days, amber 15-30 days, red 30+. HR will monitor training completion and contact employees and non-employees to follow up with outstanding training. When individuals reach amber and red in the RAG rating, line managers and Heads of Departments will also be notified to support in the completion of the training.

If an employee has received 3 reminders to complete their mandatory training and this remains outstanding after a further 2 weeks, they will be invited to a meeting with the Group Director of Human Resources and People Development, and the Director of Student Experience and Wellbeing to discuss why the training is outstanding and any support that may be needed to complete this.

Review

Content of the College's mandatory safeguarding training is regularly reviewed and updated as required in line with Keeping Children Safe in Education legislation.

The College's Safeguarding and Prevent training is reviewed, updated and renewed annually for all employees and non-employees.

Appendix P - Disclosure and Barring Service Checks

Purpose and content

The purpose of this appendix of the College Safeguarding Policy is to provide a clear set of guidelines regarding the College approach to Disclosure and Barring Service (DBS) checking within the statutory framework.

The College Safeguarding Policy has been developed in line with statutory guidance and the locally agreed inter-agency procedures put in place by the Tees Safeguarding Children Partnership (Hartlepool, Stockton, Middlesbrough & Redcar) and the Tees wide Safeguarding Adults Board. The policy applies to all learners and all staff (including agency and hourly paid staff) irrespective of anyone's position or role in the College, together with Governors and any workers who are at the College on a voluntary/placement/other professional basis.

Please note that the term 'College' is used throughout this appendix, as a generic term that encompasses all organisations within the wider College group; namely Stockton Riverside College, Redcar & Cleveland College, NETA Training Group, Bede Sixth Form College, and Inner Summit. The term 'staff' is also used as a generic term that encompasses all groups of workers as outlined in the paragraph above.

DBS checks

DBS checks enable organisations to make safer recruitment decisions by identifying those who may be unsuitable for work with children and/or vulnerable adults. The College deems itself to be a 'specified place' in line with the Department for Education (DfE) September 2025 statutory guidance; 'Keeping children safe in education' and as such the appointment of all College staff is subject to a satisfactory enhanced DBS check.

The enhanced DBS check will include a check of the barred lists and will show all offences not filtered under the Rehabilitation of Offenders (ROA) Act 1974 (Exceptions Order 1975, amendments 2013 & 2020). A DBS check is necessary because all College staff have the opportunity, daily, for contact with children and it is impracticable to always fully supervise volunteers.

Learners who will be undertaking work with children and/or vulnerable adults as part of their course will also be subject to an enhanced DBS check. This check will be undertaken by the College for those on placement and will already have been undertaken by the employer for those with employed status in that organisation.

If the DBS disclosure certificate shows evidence that the individual is potentially a risk to children and/or vulnerable adults, the College reserves the right to withdraw any offer of employment/volunteering opportunity or an offer of a place on a course that requires the

person to work with children and/or vulnerable adults. Decisions will be made in the light of the seriousness, date and circumstances relating to the offence/s.

Minor offences of a non-safeguarding nature committed some time ago will be considered to have little or no bearing on whether the individual is suitable to work with children or vulnerable adults.

More serious offences (e.g. those involving sex, violence, terrorism or the supply of drugs) may give rise to a reasonable belief that the individual is a potential risk to children or vulnerable adults.

Decisions for staff will be made in accordance with the Disciplinary policy and procedure and in consultation with the College Designated Lead for Safeguarding and the Group Director of Human Resources.

Decisions for learners will be made by a safeguarding risk assessment panel. This is normally chaired by the Designated Lead for Safeguarding.

Further details for staff and volunteers are outlined in the Safer Recruitment section (Appendix N –and for learners in the Safeguarding Risk Assessment Panels section (Appendix K) of the Safeguarding policy.

External workers employed by other organisations

Workers employed by certain identified organisations are sometimes able to work unsupervised with College learners, usually in relation to welfare issues. These organisations include the NHS and children's social care services. Screening for this group is organised by the Student Experience and Wellbeing team and recorded by the Human Resources (HR) Department. Screening includes receipt of written confirmation from each employer that safer recruitment practices have been adhered to, including a satisfactory enhanced DBS check. An ID check must be completed on the first visit.

Single Central Record

The HR Department maintains a single central record of employment checks for staff appointed by the College. The reference number of a DBS certificate will be recorded on the record, together with the date it was seen and the initials of the member of HR who saw the certificate.

Staff from outside the United Kingdom or who have worked abroad

Prospective staff who have lived or worked overseas, (3 months +) within the last 10 years, may be subject to additional checks as considered appropriate. Such additional checks may

include certificates of good conduct or checks of foreign police records. If these are unavailable (it is not possible to obtain these checks in every circumstance) the College will pursue other avenues such as additional references, so that safer recruitment is achieved. The College will also, where appropriate seek information from overseas teaching regulatory bodies to ascertain if any concerns have been raised against prospective teaching staff.

The College reserves the right to vary these parameters in certain situations, e.g. where an applicant worked abroad for a limited period or over 10 years ago. Where this work has been in certain settings (e.g. a children's home or hospital) the College may make such additional checks as it deems appropriate.

People who do not require a Disclosure and Barring Service Check

All visitors to the College must report to reception and sign in upon arrival and out upon leaving the premises. Visitors who are accompanied by a member of staff at all times are not required to have a DBS check. Other groups who do not require DBS checks include:

- People who are on site before or after normal College hours and when children are not present, e.g. local groups who hire premises for community or leisure activities
- Learners on placement in the College who are under the age of 16. This group are not eligible for a DBS check and must be fully supervised at all times.

Work experience placements – employer DBS checks

The College is committed to ensuring that all reasonable precautions have been taken to ensure learners under the age of 18 in placement are safe. For this reason, the following principles must be applied:

- The employer should not be a sole trader
- The employer should be able to provide supervision of an adequate nature to the learner on work experience. This would normally mean more than one member of staff was on hand at all times
- If there is a potential that an individual member of staff will be working closely with a learner under the age of 18 over an extended period, the employer should look to mitigate the risk, and if this is not possible the employer would need to comply with 'regulated activity' DBS requirements and carry out an enhanced DBS check
- Department for Education Advice on Work Experience Placements is available at

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/534922/Post_16_work_experience_guidance.pdf

The College will ensure that Keeping Children Safe in Education 2024 guidance is followed.

Appendix Q - Safer Recruitment of Staff and Volunteers

Purpose and content

The purpose of this appendix of the College Safeguarding Policy is to provide a clear set of guidelines to learners, their parent/carers; and staff and other workers within the College community; together with wider stakeholders regarding the College's recruitment procedures and how these will ensure people who might abuse children and/or vulnerable adults are deterred, rejected or identified to ensure inappropriate people do not work with College learners.

The College Safeguarding Policy has been developed in line with statutory guidance and the locally agreed inter-agency procedures put in place by the Tees Safeguarding Children Partnership (Hartlepool, Stockton, Middlesbrough & Redcar) and the Tees wide Safeguarding Adults Board. The policy applies to all learners and all staff (including agency and hourly paid staff) irrespective of anyone's position or role in the College, together with Governors and any workers who are at the College on a voluntary/placement/other professional basis.

Please note that the term 'College' is used throughout this appendix, as a generic term that encompasses all organisations within the wider College group; namely Stockton Riverside College, Redcar & Cleveland College, NETA Training group, Bede Sixth Form College and Inner Summit. The term 'staff' is also used as a generic term that encompasses all groups of workers as outlined in the paragraph above.

Definitions

The key terms in this document are defined as:

- **Children:** Those under the age of eighteen
- **Vulnerable Adults:** For the purpose of safeguarding, and the College duty of care, a vulnerable adult is defined as any adult considered to be at risk

Relevant external guidance

This document has been prepared with reference to statutory requirements, including:

- 'Keeping Children Safe in Education'; Department for Education, September 2025
 - 'An employer's guide to right to work checks'; Gov.uk, June 2025
- The Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975 (amendment) Order 2019

The College defines itself as a 'specified place' in accordance with the guidance outlined in 'Keeping Children Safe in Education' September 2025 and staff working within the College as in 'regulated activity' as their positions could involve regular contact with children under the age of 18. Therefore, the College is legally entitled to ask all applicants to disclose any convictions and cautions that are not protected under the Rehabilitation of Offenders Act (ROA) 1974 (Exceptions) Order 1975 (amendments) 2013 and 2020.

The ROA 1974 makes provision for most convictions and all cautions, reprimands and final warnings to be considered spent after a certain period for many types of employment. However, because all roles within the College are deemed to be 'regulated activity' the College is entitled to request details of all convictions and cautions that are not protected (i.e. eligible for filtering) under the amendments to the ROA Exceptions Order 1975 (amendments) 2013 and 2020.

The Group is committed to equality of opportunity for all job applicants and aims to select people for employment based on their individual skills, abilities, experience, knowledge and, where appropriate, qualifications and training. The Group is an 'exempt' employer as defined in the ROA 1974 (Exceptions Order 1975, amendments 2013 & 2020) and as such has a lawful basis for requesting an enhanced DBS disclosure certificate for employees. In addition, the Group is a regulated activity provider and for most posts, we have a statutory duty to check that the individual is not barred from regulated work with children and / or adults. The safeguarding of children and vulnerable adults is of paramount importance and the scrutiny of any unspent cautions or convictions and those which would not be protected under the Ministry of Justice filtering rules is an essential and non-negotiable part of the pre-employment check process.

The 2020 Amendments to the ROA 1974 introduced new criminal record filtering rules affecting the information that employers will now receive on DBS certificates. Certain offences will never be filtered, but some spent convictions and all youth cautions, warnings and reprimands will be filtered. It is important that prospective candidates are aware of the new filtering rules so that they only disclose what is legally required prior to obtaining full DBS certificates (See Appendix A – Nacro Criminal Record Filtering Flowchart).

The Group will consider ex-offenders for employment on their individual merits.

The enhanced Disclosure and Barring Service (DBS) certificate requested by the College will reveal all non-protected convictions and cautions recorded on the Police National Computer (PNC). Offences which are serious, relate to sexual or violent offending, or are relevant in the context of safeguarding will never be filtered and will always appear. The certificate will also show any information held on the barred lists for children and adults (when requested). The police may also provide additional information which a chief officer reasonably believes to be relevant and considers ought to be disclosed.

College requirements

In line with the GDPR, The College no longer requires all applicants to confirm on their application form whether they have any non-protected convictions and cautions. Instead, shortlisted candidates are now required to complete a Criminal Record Self Disclosure form before attending for interview. During the interview the recruiting manager will ensure that an open and measured discussion takes place about any offences or other matters that might

be relevant to the position. If this is not received, an application for a DBS certificate will not be made and an offer of employment will be withdrawn on this basis. Applicants are not protected by the Rehabilitation of Offenders Act 1974 if they fail to disclose relevant information and will be warned that failure to reveal information could lead to the withdrawal of an offer of employment or the termination of employment if an appointment has already taken place.

The Human Resources (HR) department will also check to see that appointed staff and those persons that wish to volunteer to work in the College are not barred from working with children, or vulnerable adults (where applicable) by undertaking a separate barred lists check prior to staff or volunteers starting work at the College. This will include a check against the Secretary of State's Prohibition Orders for teachers where relevant to the applicant's role.

The College is nevertheless committed to promoting equality of opportunity and will accept applications from candidates with criminal records where these offences are not relevant to employment at the College. The College undertakes to comply fully with the revised DBS Code of Practice (November 2015) and does not automatically exclude applicants based on convictions or other information received (unless there is a legal bar). Candidates are selected for interview and for appointment based on their overall suitability for the post, which considers skills, qualifications, experience and attitude to the job they have applied for.

To comply with statutory requirements, the HR department maintains a Single Central Record (SCR) of pre-employment checks that the College is required to carry out on staff and volunteers. It is essential that employees involved in the recruitment of staff work together to ensure that all the necessary checks are completed and recorded promptly to ensure that children and vulnerable adults are not put at risk and that the College complies fully with statutory requirements. Financial penalties and criminal action may be imposed on the College if a barred individual or someone who does not have the right to work in the UK is appointed to a post in the College. There are also penalties of up to five years in prison if a barred person is convicted of engaging, or attempting to engage, in work at the College.

The table on the last page of the appendix shows the pre-employment checks that must be undertaken for different groups of staff and volunteers before they start work at the College. The relevant information, and the date of the check will be entered on the SCR, and a copy of relevant documents (e.g. copies of photographic ID and qualifications) will be included on the individual's personnel file.

It is the responsibility of the recruiting manager to ensure that HR are aware of all planned appointments, including hourly paid staff, agency staff, self-employed contractors, placements and volunteers in sufficient time to ensure that the correct checks are carried out and recorded on the SCR before the planned start date. Staff and volunteers who have

had a 3 month+ break in service must complete all pre-employment checks as if they were a new appointment. It is the responsibility of the HR Department to ensure that the appropriate checks are carried out, and that employees are not permitted to start work with the College prior to this. Relevant guidance has been issued to all staff involved in recruitment and it is essential that they comply with the guidance. Failure to do so may have consequences for learners, the College and for the individual themselves if it can be demonstrated that he/she acted in contravention of the safer recruitment section of the safeguarding policy.

In all cases, an identity check, right to work in the UK check, qualification check, online search check, employment history, health declaration check and two written references (one of which must be the last employment working with children and, if not applicable, the present or last employer) must be completed prior to staff commencing employment. In all but exceptional cases, the DBS certificate should also have been received prior to employment. Please see section 9 and 10 below for circumstances whereby the DBS certificate has not been issued to the employee and presented for verification. This includes clear risk assessments which are reviewed every two weeks.

Note: Volunteers and Initial Teacher Education (ITE) students, or other learners, must not start their role/placement until all checks are complete.

Pre-employment recruitment checks do not, however, take away the need for ongoing safeguarding awareness. Recruitment checks are only likely to identify those people that have been convicted or who have come to the attention of the police. Some individuals who are unsuitable to work with children and/or vulnerable adults will not have any previous convictions or appear on the barred lists. Ongoing awareness during employment is essential, not only during the induction or probationary periods. All employees and volunteers must be aware of what is likely to constitute inappropriate conduct and their responsibilities to report it through the correct channels if they have a concern about a colleague.

A copy of the overarching College Safeguarding Policy, together with Appendix A (Child and Vulnerable Adult Protection) and Appendix P (Staff Code of Conduct) will be provided to all staff and volunteers by HR during induction. The role of the Designated Lead for Safeguarding will also be explained.

Deterring unsuitable applicants from applying or volunteering to work at the College

To discharge its obligations under safer recruitment requirements, the College has put in place several actions that will help to prevent unsuitable people applying for positions at the College. These include:

- All advertisements for posts carrying an explicit safeguarding statement

- The College does not accept CVs. Candidates must fully complete an application form, accounting for any gaps in employment.
- Safeguarding and Prevent are clearly set out as duties and responsibilities in each job description that is advertised.
- The application form containing a statement stating the College's commitment to safeguarding and a requirement for the applicant to disclose all non-protected convictions, cautions and pending prosecutions prior to interview.

Conditional offers of employment subject to the College receiving satisfactory DBS certificate, Identity check and references.

Shortlisting and interviews

All interview panels must have at least one panel member who has completed training in safer recruitment training within the previous 3-year period. HR will inform managers of appropriate safer recruitment training options and issue reminders.

Application forms must be scrutinised prior to interview and any issues such as gaps in employment or contradictory information noted for shortlisted candidates for discussion at interview.

A question to identify any potential safeguarding concerns or to test an applicant's attitude towards working with children and vulnerable adults must be incorporated into all interviews and it must also be established whether the applicant has the physical and mental capacity for the role. This will assess the applicant's ability to effectively contribute towards the College's commitment to safeguarding.

At least one panel member, who must have undertaken safer recruitment training, must ensure that any non-protected convictions, cautions or potential pending offences are fully explored (either before, during or after the interview as appropriate) to assess suitability for appointment.

All recruiting managers across the college are required to undertake mandatory Safer Recruitment training.

ID and right to work in the UK checks

Photo identification must be presented at interview to Recruiting Managers and again later to HR to support the applicant's DBS application. Once identity is confirmed an endorsed dated copy of the relevant document will be taken and retained on the applicant's HR file.

Right to work in the UK checks for applicants for staff posts will be conducted in accordance with Home Office guidance. Applicants will need to provide acceptable documents in line with the guidance to establish either a permanent or temporary right to work in the UK. For

example, a standard UK passport that confirms British citizenship establishes a permanent right to work in the UK. Documents will be checked in the presence of the applicant and an endorsed dated copy of the relevant part/s of the document/s retained on the applicant's HR file.

Further checks will be conducted at an appropriate later date/s for individuals with a temporary right to work in the UK to ensure College employment practice adheres to legislation.

Qualification checks

All shortlisted applicants are required to provide original certificates or academic transcripts (as appropriate) prior to, or at interview to provide proof of any qualifications which are deemed 'Essential' within the Person Specification for the role. and any level 2+ qualifications in English and maths.

The recruiting manager must review, verify and make a dated endorsed copy of any 'Essential or Desirable' qualifications as required by the Person Specification – these should be scanned and sent to HR, and copies will be retained on the individual's HR file. All managers, curriculum delivery and curriculum support staff must have the qualifications deemed to be essential for their role. Any exceptions to this must be justified by the Recruiting Manager and recorded on the Successful Candidate Form and signed off prior to appointment.

Some support staff may also not have any relevant qualifications. Each case will be assessed with reasons for why a decision to proceed with an appointment was made noted on the interview records and Successful Candidate Form by the relevant Recruiting Manager. A qualification check is not required for volunteers.

Disclosure and Barring Service (DBS) checks

DBS checks are initiated by HR, and the DBS certificate is returned from the DBS to the individual. It is essential that all new applicants provide their DBS certificate to HR as soon as they receive it to ensure that there are no unnecessary delays with the recruitment process. Where an offence is disclosed through the checking process HR will inform the Group Director of HR and the College Designated Lead for Safeguarding. The offence/s will be assessed to determine whether an appointment can be confirmed reviewing any potential safeguarding implications (e.g. offences involving violence, sexual activity or drugs) within the risk assessment.

In exceptional circumstances, the Head of Department may require a member of staff to commence in post prior to the DBS certificate being available. In these cases, the following must apply:

- A Self-Disclosure response form must have been completed and received by HR
- The DBS certificate must have been applied for

- All other safer recruitment and pre-employment checks must be completed and satisfactory
- A risk assessment must have been completed by the Head of Department prior to employment commencing and approved by the Group HR Director
- A separate barred list check has been completed
- The risk assessment will clearly state the agreed arrangements for supervision
- The DBS certificate must be received by HR within 10 working days of being dispatched by the DBS service. If this does not happen the employee will be contacted by the HR department and invited to an interview with the Group Director of HR and informed that the DBS certificate must be received by the HR Department on the next working day
- If the DBS certificate is not received within the allotted time, the employee will be informed by the Group Director of HR and his/her Head of Department that he/she will not be permitted to work in the College until the DBS certificate is received and deemed satisfactory
- The Head of Department must review and update the risk assessment on a two-weekly basis until HR confirm the DBS certificate has been received.

References

Two written references are required for all applicants. One reference should be from the candidates most recent employment with children, if they have no employment working with children the reference should come from the candidate's current employer and the other from another appropriate person in their current or most recent post wherever possible. Where the candidate has previous employment with children, which differs from their current employment, the college will endeavour to obtain references from both employments.

HR will endeavour to obtain written references directly from the referee for all shortlisted applicants, including internal applicants, so that any issues of concern can be discussed at interview. Referees must be contacted if the information provided is vague or incomplete and requested to provide further information.

Additional references may be requested at the discretion of the College.

References that appear to have been "agreed" and which may have been agreed as part of a settlement agreement with a previous employer should be fully explored prior to an appointment being made.

In exceptional circumstances, the Head of Department may require a member of staff to commence in post prior to two written references being received. In these cases, the following must apply:

- The written references must have been requested by HR
- All other pre-employment and safer recruitment checks must be completed and satisfactory
- At least one written reference and one verbal reference, from a valid source such as the current/previous employer, must have been obtained with a clear and dated record of this noted on the member of staff's file in HR
- A risk assessment must have been completed by the Head of Department and approved by the Group Director of HR
- The risk assessment must be reviewed every two weeks until the written references are received with rigorous action taken to secure them
- If the references are not received within one calendar month HR will notify the Group Director of HR who will provide advice on further actions

Further checks for applicants who have lived or worked outside the UK

HR will carry out any additional checks it is felt to be necessary for applicants who have lived or worked outside the UK so relevant events can be considered. Home Office guidance for checks in relevant countries will be consulted and considered in each case.

HR must be satisfied that an applicant is not, and has never been, the subject of a sanction, restriction or prohibition issued by the Teaching Regulation Agency (formerly National College for Teaching and Leadership), or any predecessor or successor body, or by a regulator of the teaching profession in any other country which prevents the applicant working within the Group.

Volunteers

Occasionally people may wish to volunteer to work at the College, for example to gain work experience. Volunteers are subject to the same level of scrutiny in terms of statutory checking as employed staff as the College deems them to be in 'regulated activity' as full supervision, at all times, is not always practicable. The required checks must be completed before the voluntary work begins.

Agency staff / partner organisations

The College needs to be confident that staff employed by agencies have been subject to the appropriate checks. Managers requiring this sort of provision must ensure that HR has been informed and that the relevant confirmation of pre-employment checks has been obtained from the agency prior to the appointment date. However, in all cases the agency worker must provide valid photographic evidence of identity prior to starting work.

The College also needs to assure itself that staff from organisations that legitimately require access to College learners have been subject to appropriate checks. This includes staff from partner organisations such as the NHS, social services, Youth Directions and employers of apprentices. A letter from an appropriate department within each organisation (e.g. HR) that

identifies each member of staff and confirms that all appropriate checks have been completed must have been received and logged with HR by Student Experience & Wellbeing (for welfare related aspects) or the Head of the relevant department (for employers) before access is allowed.

Similarly, managers may receive requests for vetting information about College staff that are engaged in activities with learners from partner organisations e.g. staff working with 14-16 learners in local schools. Any requests should be referred to HR who will provide a letter to confirm the checks which have been completed.

Self-Employed Contractors

Self-Employed Contractors are subject to the same level of scrutiny in terms of statutory checking as employed staff as the College deems them to be in 'regulated activity'. The required checks must be completed before the assignment begins.

Visitors to the College

Accompanied visitors to the College do not require DBS checks to be undertaken, however they must register their presence at reception on site upon arrival, obtain a visitor's lanyard which must be worn at all times during their time on the College premises and always be accompanied by a member of staff.

Online update DBS checking service

Where an applicant has an enhanced DBS certificate that details the relevant checks covering the appropriate workforce (e.g. children and or Adult) and they subscribe to the online DBS update service, they must provide HR with the original DBS certificate and details of their registration with the update service.

HR will conduct a check to confirm the certificate matches the applicant's identity. Where a status check online reveals a change(s) to the certificate then the applicant must apply for a new certificate.

Secure storage, handling use, retention and disposal of DBS information

DBS information is only used for the specific purpose for which it is requested and for which the applicant's full consent has been given. DBS information will be held on the Single Central Record which has strictly controlled access.

The College will not keep any photocopy or other image of the certificate or representation of the contents. The College will (as required by law) keep a record of the certificate unique reference number and the date of issue within the SCR.

The College is required to keep a copy of a DBS Certificate for any employee who is working for the College through a Skilled Worker Visa Sponsorship. This is a requirement of the UK Visa and Immigration legislation. Copies of certificates of these individuals will be stored in Electronic Personal Files which has strictly controlled access.

Receiving a criminal record/conviction whilst in employment at the College

Ongoing awareness during employment is vitally important in order to protect learners. As part of this the College reserves the right to request any member of staff or any volunteer to undergo repeat checks, including a DBS check, at any time.

The College also requires staff and volunteers to disclose to HR details of any criminal offences or police investigations into potential criminal offences that are acquired, or occur, during the period of employment or placement with the College. Failure to disclose this information may be deemed to be gross misconduct and lead to dismissal. HR will share the information disclosed only with those who have a need and right to know (e.g. the line manager) and the information disclosed will be discussed with the member of staff or volunteer before reaching a decision about any action to be taken.

Receiving a criminal record, or being the subject of an ongoing investigation, whilst employed or placed at the College does not automatically mean that the member of staff or volunteer cannot continue in their role. Where necessary, any action taken by the College will be in line with the relevant provisions within the College's Disciplinary policy and procedure.

Referral to other agencies

The College has a duty to refer any suspected safeguarding issues involving staff or a volunteer to the Local Authority Designated Officer for Safeguarding.

Where the College ceases to use the services of a teacher because of serious misconduct or would have dismissed them had they not left first, the College will consider whether to refer the case to the Secretary of State, as required by the Education Act 2002. The Secretary of State may investigate the case and may then decide to make a prohibition order in respect of the person.

The College has a legal duty to refer to the DBS anyone who has harmed, or poses a risk of harm, to a child or a vulnerable adult; where the individual has been removed from working (paid or unpaid) in regulated activity or would have been removed if they had not left.

Table showing the checks required for each category of staff/volunteer

The Etc. Group Recruitment Matrix

Individual Type	Definition	Interview Notes	Successful Candidate/VP Assignment Sheet	Volunteer Assignment Sheet	Placement Assignment Sheet	Self-Employed Candidates Form	Agency Non-Employee Details Form	Photographic ID	Right to Work (Passport)	Two References	Enhanced DBS	Banned List	Criminal Record Self-Disclosure	Application Form	Qualifications	Medical Fitness Declaration	New Starter Form (Payroll)	TEN Prohibition Check	HR35/ Employment Status SDS Questionnaire	Online Candidate Checks	S128 Check	Overseas Check
Staff	Salaried and Hourly Paid Staff	✓	✓					✓	✓	✓	✓	✓	✓	✓	✓ (If applicable)	✓	✓	✓ (Anyone with a TEN)		✓	✓ (Budget holders Only)	✓
Volunteers	An individual who works for the organisation without being paid	✓		✓				✓		✓	✓	✓	✓	✓				✓ (Anyone with a TEN)		✓		✓
Placements	A trainee teacher from an education establishment				✓			✓	✓	✓	✓	✓								✓		✓
Self-Employed Contractor	Individuals who work as a sole trader or via their own limited company and submit invoices					✓		✓	✓	✓	✓	✓	✓		✓ (If applicable)			✓ (Anyone with a TEN)	✓	✓		✓
Agency Staff	Staff employed via an agency/other company and submit invoices						✓	✓	✓	✓	✓	✓			✓ (If applicable)			✓ (Anyone with a TEN)	✓	✓	✓ (Budget holders Only)	✓
Third Parties/Sub-Contractors	Individuals who are employed by an outside company who provide service to Etc							✓ (Screened only - No copy kept - Only signed on SDS)			✓	✓										
Governors	Individuals responsible for overseeing the management of the Group							(Sarah Thompson)	✓ (Sarah Thompson)	✓ (Sarah Thompson)	✓	✓	(Sarah Thompson)	✓ (Sarah Thompson)						✓	✓	

Written Confirmation
Only Required

* Please note that HR need to sight all originals of ID and Right to Work along with written confirmation that they have been checked.



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Policy Statement:

Appendix R - Staff Code of Conduct

<u>Date approved:</u>	<u>18 June 2024</u>	<u>Review Date:</u>	<u>November 2025</u>
<u>Approved by:</u>	<u>People Committee</u>		
<u>Relevant to (please</u>	☒ <u>Bede</u>	☒ <u>Innersummit</u>	☒ <u>NETA</u> ☒ <u>RCC</u> ☒ <u>SRC</u> ☒ <u>Skills Academy</u>
<u>Signed (Lead Manager):</u>	<u>Kay Taylor</u>		
<u>Print Name:</u>	<u>KAY TAYLOR</u>		

1 PURPOSE

The purpose of this policy is to provide a clear set of principles to guide staff in how they are expected to conduct themselves in day to day work.

It is not possible to write an exhaustive list of rules governing staff conduct. Staff should be trusted in the discharge of their responsibilities, allowing room for initiative and professional judgement.

2 SCOPE

This Policy covers all staff, volunteers, governors, agency, students, visitors and contractors.

3 STATEMENT OF ACTION

Etc. is committed to providing clear employment policies and procedures that form a basis for treating all employees fairly and equally.

Etc. will regularly review all human resource policies and procedures in line with changes to employment law and where applicable best practice to support our Great Place To Work Strategy.

4 LINKED POLICIES

- Whistleblowing policy and procedure
- Disciplinary policy and procedure
- Harassment, discrimination and bullying policy and procedure

5 LOCATION AND ACCESS

The Group Gateway site – Human Resources Policies and Procedures



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Procedure:

Staff Code of Conduct

Purpose

- 1.1 The purpose of this policy is to provide a clear set of principles to guide staff in how they are expected to conduct themselves in day-to-day work.
- 1.2 It is not possible to write an exhaustive list of rules governing staff conduct. Staff should be trusted in the discharge of their responsibilities, allowing room for initiative and professional judgement.
- 1.3 This document, however, provides a consistent framework and guidelines.
- 1.4 Staff should seek advice from the Head of Human Resources (HR) in the first instance or a member of the Senior Management Team (SMT) if they have any queries about the content of this document, or if they require advice on how any aspect of conduct may be regarded.

2.0 Scope

- 2.1 This Policy covers all staff, volunteers, governors, agency, students, visitors and contractors.

3.0 References and Related Documentation

- 3.1 This Procedure should be read in conjunction with the following documentation:
 - Safeguarding policy
 - Disciplinary policy and procedure
 - Single equality scheme
 - Financial procedures, specifically anti bribery, procurement and gifts and hospitality
 - Whistleblowing policy and procedure
 - Harassment, discrimination and bullying policy and procedure

4.0 Professional boundaries / working with students

- 4.1 All members of staff are responsible for ensuring their relationships with learners are never of a kind that could compromise their professional responsibilities. This means professional boundaries must be maintained at all times. This includes:
 - Personal relationships with learners should not be sought out or conducted by staff members. If any staff member has an existing relationship (e.g. family member) with an under 18 learners, advice should be sought from the Safeguarding team to ensure the staff member and learner are safeguarded appropriately
 - Personal contact details should not be given to learners
 - Personal phone numbers and email should not be used to contact learners
 - Learners and staff should not be 'friends' on Facebook or in contact via other personal social media other than those approved such as 'Group Facebook groups' which are monitored. This includes using private messaging on group platforms. Staff should also be cognisant of public postings (e.g. Facebook/Instagram) and the potential implications of such posts being accessible to students. Staff should note that whether you or someone else posts to your social media handles, you are responsible for this content, therefore privacy settings should be considered.

- If a member of staff is thought or identified to be behaving in a way that is putting a young person at risk, or behaving inappropriately with any learner in a manner that could be seen to be subjecting them to harm or duress, this should be reported to the Group Designated Lead for Safeguarding or any member of SMT immediately

5.0 Additional professional responsibilities

5.1 Staff are reminded that they are expected at all times to:

- Not engage in any capacity with the media and if approached to advise the Group Director of Marketing and Business Engagement immediately. The only exception to this is where the person approached is a member of the senior management team in this case advice should still be sought from the Group Director of Marketing and Business Engagement in the first instance, as far as is reasonably practicable, but if this is not possible then personal professional judgement should be utilised.
- Preserve the confidentiality of information relating to the group's business which includes staff, learners, finances, marketing and strategic planning, together with any further information rightly to be judged the property of the group (except as outlined in Whistleblowing policy and procedure) and/or could reasonably be considered commercially sensitive.
- Always Wear their Group ID with the appropriate coloured lanyard when on group premises
- Support the monitoring of fundraising activities to ensure that monies raised are not used to fund extremism and so prevent a damaging effect on the safeguarding of learners and the group's reputation.

6.0 Gifts and Hospitality

6.1 It is an offence under the Bribery Act 2010 for members of staff to accept corruptly any gift or consideration as an inducement or reward for doing, or refraining from doing, anything in an official capacity or showing favour or disfavour to any person in an official capacity.

6.2 The guiding principles to be followed by all members of staff must be:

- The conduct of individuals should not create suspicion of any conflict between their official duty and their private interest
- The action of individuals acting in an official capacity should not give the impression (to any member of the public, to any organisation with whom they deal or to their colleagues) that they have been (or may have been) influenced by a benefit to show favour or disfavour to any person or organisation

6.3 Members of staff should not accept any gifts, rewards or hospitality (or have them given to members of their families) from any organisation or individual with whom they have contact in the course of their work that would cause them to reach a position whereby they might be, or might be deemed by others to have been, influenced in making a business decision as a consequence of accepting such

hospitality. The frequency and scale of hospitality accepted should not be significantly greater than the group would be likely to provide in return.

- 6.4 When it is not easy to decide between what is and what is not acceptable in terms of gifts or hospitality, the offer should be declined or advice sought from a member of the Senior Management Team or Director of Governance. For the protection of those involved, the Clerk to the Corporation will maintain a register of gifts and hospitality received where the value is in excess of £10. Members of staff in receipt of such gifts or hospitality are obliged to notify the Clerk to the Corporation promptly.

7.0 Bribes and inducements

- 7.1 The making or accepting of bribes or any other inducements, financial or non-financial, in respect of any transactions carried out on behalf of the group by any staff is forbidden and shall be a disciplinary offence.

8.0 Working with Colleagues

- 8.1 Staff must adhere to the group's policies and procedures, the 'Tone of Voice' and be aware their actions may have consequences for others.
- 8.2 Staff must attend meetings and other commitments on time and meet other deadlines on which their colleagues depend.
- 8.3 Staff must adhere to the group's policies and procedures because their actions have consequences for others. If staff have any doubts or concerns about their own or a colleague's actions, they should seek advice from their line manager. All group policies and procedures are on the staff gateway.

9.0 Professional Prejudice

- 9.1 The group always sets an expectation of mutual respect among all staff regardless of professional role and we therefore do our best to avoid 'professional prejudice'. Professional prejudice is the belief, based on presumption rather than evidence, that one part of an organisation's staff is in some way more professional than another part of its staff or that some skills within the organisation are more important or somehow superior to others. Professional prejudice harms the effectiveness of organisations because it attacks victims' self-esteem.
- 9.2 Professional prejudice is frequently unintentional and inadvertent and, for example, can show as:
- Not understanding the contribution of support staff to the group mission, vision and values.
 - Failing to act on instructions correctly or respond to a colleague's request with reasonable promptness
 - Careless use of language when referring to colleagues
 - Assuming that other colleagues are under less work pressure than oneself
 - Failing to treat a colleague's skills and abilities with the respect one would expect for one's own.

10.0 Representing the group

- 10.1 In order to preserve the reputation of the group, staff must:
- Check with the relevant budget holder before committing resources other than those for which they have responsibility

- Take care over the use of group/college headed notepaper and logos, whether for use themselves or the use of learners they are supervising; in particular ensure that written communication they are sending outside the group is in line with agreed branding standards which are available on the Gateway. In the event of any concern, seek assistance from a member of the Secretariat team
- Always maintain professional standards of conduct towards others when acting in a Group capacity
- Dress appropriately when acting in a professional capacity
- Not engage in activity that would bring the group into disrepute
- Use appropriate language at all times

11.0 Group Property

11.1 In order to preserve the quality of the group's environment and physical resources staff must ensure that:

- They, and learners for whom they are responsible, take reasonable care of the group premises and property which they use
- Procedures for borrowing group equipment are observed
- Energy is conserved wherever possible
- The security of group property is maintained as well as possible and not put at risk
- They pay the group for any costs incurred by the personal use of group equipment (for example phone, photocopier)
- Additionally, staff should also assist with the security of the group by directing/escorting to Reception anyone who they think might be a stranger on site

Appendix S - Allegations and Whistleblowing (Safeguarding)

1. Purpose and content

The purpose of this appendix of the College Safeguarding Policy is to provide a clear set of guidelines to staff regarding the actions they must take to raise concerns about staff; or about poor or unsafe practice and potential failures in the College's safeguarding arrangements.

The College Safeguarding Policy has been developed in line with statutory guidance and the locally agreed inter-agency procedures put in place by the Tees Safeguarding Children Partnership (Hartlepool, Stockton, Middlesbrough & Redcar) and the Tees wide Safeguarding Adults Board. The policy applies to all learners and all staff (including agency and hourly paid staff) irrespective of anyone's position or role in the College, together with Governors and any workers who are at the College on a voluntary/placement/other professional basis.

Please note that the term 'College' is used throughout this appendix, as a generic term that encompasses all organisations within the wider College group; namely Stockton Riverside College, Redcar & Cleveland College, NETA Training group, Bede Sixth Form College, The Skills Academy and Tees Valley Catering. The term 'staff' is also used as a generic term that encompasses all groups of workers as outlined in the paragraph above.

2. Definitions

- **Whistleblowing:** Whistleblowing is the term used when someone who works in, or for, an organisation wishes to raise concerns about malpractice, wrongdoing, illegality or risk in the organisation (e.g. neglect of safeguarding responsibilities) and/or the cover up of any of these.

3. Taking safeguarding seriously

All staff must be aware of, and avoid, poor practice:

- Failing to listen to the views of the child / vulnerable adult
- Failing to act on, and refer, the early signs of abuse and neglect or radicalisation /terrorism
- Sharing information too slowly
- Poor record keeping
- Failing to act or re-assess concerns when situations do not improve
- Lack of challenge to those who appear not to be taking action

4. Acting on safeguarding concerns and allegations made about staff, including supply teachers, volunteers and contractors

All staff are assured their concerns will be taken seriously by College senior leaders. Concerns about members of staff must be immediately reported to one of the following:

- Principal

- Designated Safeguarding Lead
- Any member of the College Senior Leadership Team

Concerns about staff may be because:

- They have behaved/are behaving in a way that has, or may, harm a learner, this to include any low level concerns
- They may have possibly committed an offence that may raise questions about their suitability to be in contact with children and/or vulnerable adults
- They have acted/are acting in an inappropriate way with learners

Concerns about staff may relate to current or historic behaviour and must be reported regardless of whether the alleged abuse took place in the College or another place. The College Designated Lead (DSL) for Safeguarding must be informed of all allegations that raise concerns about child and/or vulnerable adult protection. The DSL must liaise with the Head of HR so they can consult the Local Authority Designated Officer (LADO), police and social care services as appropriate. It is a statutory responsibility to inform the LADO of any concerns relating to staff potentially harming children, within one working day.

Concerns about College safeguarding practice must be immediately reported to one of the following:

- Group Principal
- Designated Safeguarding Lead
- Any member of the College Senior Leadership Team

5. Whistleblowing

If your concerns are about the Group Principal or you feel unable to raise your safeguarding concerns about a member of staff or College safeguarding practice or if you feel your genuine concerns are not being addressed:

Contact the nominated Governor, Gary Wright, via Sarah Thompson (Clerk to the Governors) by:

- Email – sarah.thompson@stockton.ac.uk
- Telephone – 01642 865415

If the situation is not rapidly resolved follow the guidance available in Keeping children safe in education 2024; statutory guidance for schools and colleges. This document is available on the staff gateway on the home page of the College Safeguarding (including Prevent) site.

Where a staff member feels unable to raise an issue with their employer, or feels that their genuine concerns are not being addressed, other whistleblowing channels may be open to them:

- general guidance on whistleblowing can be found via: [Advice on Whistleblowing](#); and
- the [NSPCC's what you can do to report abuse](#) dedicated helpline is available as an alternative route for staff who do not feel able to raise concerns regarding child protection failures internally or have concerns about the way a concern is being handled by their school or college. 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.

6. College duty of care to staff

The College is committed to dealing with any allegations or issues quickly, and in a fair and consistent way, that provides effective protection for whistle-blowers and any learners /others involved whilst at the same time supporting the member of staff who is the subject of an allegation. This will include providing a named contact to any member of staff who is suspended whilst an allegation is investigated. The following definitions will be used when determining the outcome of an allegation against a member of staff:

- **Substantiated:** there is sufficient evidence to prove the allegation
- **Malicious:** there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive
- **False:** there is sufficient evidence to disprove the allegation
- **Unsubstantiated:** there is insufficient evidence to either prove or disprove the allegation

Further information is available in the Staff Disciplinary policy. This document is available to staff on the policies and procedures section on the staff gateway under Human Resources.

Appendix T - Low-level concerns policy

1. Purpose and content

The purpose of this appendix of the College Safeguarding Policy is to provide a clear set of guidelines which enable all staff to share any concerns – no matter how small – about their own or another member of staff's behaviour.

It is important to share low level concerns to create and embed a culture of openness, trust and transparency in which the clear values and expected behaviour, as set out in the Staff Code of Conduct, are constantly lived, monitored and reinforced by all staff.

In line with Keeping Children Safe in Education (2025), all staff have a duty to report any low-level concerns relating to Etc. staff, agency workers, and/or visitors, recognising that even seemingly minor behaviours may be significant in ensuring the safety and wellbeing of children and in maintaining a culture of vigilance, transparency, and safeguarding across the Group.

Safeguarding and promoting the welfare of children and adult learners is everyone's responsibility.

2. Definitions

The key terms in this document are defined as:

- **All staff:** Anyone associated with the organisation – i.e. whether working in or on behalf of the organisation, engaged as a paid employee (including supply teacher), worker or contractor, or unpaid member of staff or volunteer. It also includes anyone who is part of the Governing Body.
- **Designated Safeguarding Lead (DSL):** Director of Student Experience and Wellbeing.
- **Deputy DSL:** Student Experience and Wellbeing Manager.
- **HR:** Human Resources Team.
- **LADO:** Local Authority Designated Officer.

'Low-level' concern: The term 'low-level' concern does not mean that it is insignificant.

Low level concerns are any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' - that an adult working in or on behalf of the college may have acted inappropriately and is inconsistent with the staff code of conduct, including inappropriate conduct outside of work.

Examples of such behaviour could include, but are not limited to:

- being over friendly with learners
- having favourites

- taking photographs of learners on their mobile phone, contrary to college policy
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door
- making inappropriate comments to learners
- humiliating children/ learners.

3. Actions to be taken in response to low level concerns.

General principles are:

- All low-level concerns will be responded to in a sensitive and proportionate way; such concerns when raised will be handled promptly and effectively, thus protecting staff from any potential false low-level concerns or misunderstandings.
- Where there are Low-level concerns which are shared about supply staff and contractors, advice is sought from the Local Area Designated Officer (LADO) and if appropriate they will notify the employer. Records of information sharing with the LADO are maintained by the Human Resources department.

Sharing low level concerns

- All low-level concerns must be shared confidentially with the DSL, Deputy DSL or Group Head of HR.
- Staff will be encouraged and supported to feel confident in self-referring, where, for example, they have found themselves in a situation which could be misinterpreted, might appear compromising others, and/or on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards.
- If staff do not feel confident to report concerns to the Group Director of HR, DSL, or Deputy DSL in their absence, they should report to the NSPCC Whistleblowing Advice Line: 0800 028 0285.

Responding to low level concerns (staff members)

The DSL / Deputy DSL will liaise with HR to ensure that it is a low-level concern and should not be reclassified as a higher-level concern/allegation. Once the level of concern has been established, guidance will be taken from HR.

Most low-level concerns will be dealt with by means of management guidance, training etc. In dealing with a low-level concern with a member of staff, this will be approached in a sensitive and proportionate way. The manager will seek and receive advice from HR regarding discussion of the low-level concern.

If it is deemed a higher level the Disciplinary Policy will be followed.

- If the College HR team is in any doubt as to whether the information which has been shared about a member of staff as a low-level concern in fact meets the harm threshold*, they will refer to their LADO.

** The Children Act 1989 introduced Significant Harm as the threshold that justifies compulsory intervention in family life in the best interests of children. Physical Abuse, Sexual Abuse, Emotional Abuse and Neglect are all categories of Significant Harm.*

Recording of low-level concerns

All low-level concerns will be recorded by the Human resources team. The record will include details of the concern, the context in which the concern arose, and action taken.

The name of the individual sharing their concerns should also be noted. However, if the individual wishes to remain anonymous, their wish will be respected as far as reasonably possible.

The record will be kept confidential and held securely in compliance with the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR). The record will be held by HR on the P File where it is a staffing matter.

Records will be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour may be identified.

Where a pattern of such behaviour is identified, the college will decide on a course of action, either through its disciplinary procedures or, where a pattern of behaviour moves from a concern to meeting the harm threshold, the college will take the necessary action and will refer to and liaise with the Local Authority Designated Officer (LADO).

Consideration will also be given to whether there are wider cultural issues within the college that enabled the behaviour to occur and where appropriate policies need to be revised, or extra training delivered, to minimise the risk of it happening again.

The record will be retained at least until the individual leaves their employment.

References

HR policy will be followed, but with reference to Keeping Children Safe in Education, which states that *'a low-level concern which relates exclusively to safeguarding (and not to misconduct or poor performance) will not be referred to in a reference. However, where a low-level concern (or group of concerns) has met the threshold for referral to the LADO and found to be substantiated, it should be referred to in a reference.'*



Low Level Concern Report

This form may be used to share any concern with the Designated Safeguarding Lead (DSL), Deputy DSL or Group Head of HR, no matter how small or seemingly insignificant, even if no more than causing a sense of unease or a 'nagging doubt' that an adult may have acted in a way that is inconsistent with the College Code of Conduct (including inappropriate conduct outside of work) and/or in a way that on first glance does not appear to meet the allegation, 'harm' threshold.

A concise, written, record is required, including brief context in which the low-level concern arose. Details should be chronological, precise and as accurate as possible, clearly outlining concern(s) and /or relevant incident(s). If the concern is about what an individual is alleged to have said, please use the exact words used, as far as possible. If the concern is about an action, please describe what was observed. The form should be signed and dated, with the time of completion recorded. Additional sheets may be used as necessary, and these should also be signed and dated.

Details of CONCERN:

Name of reporting Staff member:

Department, College site and Role:

Signed:

Time and Date:

Received by (Name and Role):

At (time):

Date:

HAVE YOU MENTIONED THE LOW-LEVEL CONCERN TO THE PERSON CAUSING CONCERN?

(Good practice will require a response).

NO ☐ - Give a brief but valid reason/explanation for not.

YES ☐ - Please complete detail below - STAFF MEMBER'S RESPONSE TO CONCERN :

ACTION TAKEN:

Was advice/guidance sought from the LADO and or Human Resources? Yes: ☐ No : ☐

Signed:

Date:

This record form will be held securely, either digitally or in paper form, in a central file within Human Resources in accordance with associated guidance regarding the management of concerns and or allegations and in accordance with Etc's Data Management practices/policies.

Low Level Concern reporting will be treated as confidential as far as possible, however in certain circumstances it may be necessary to share and or disclose the information with third parties for relevant and necessary reasons. This includes where a reporter has indicated they wish to remain anonymous.

