



education  
training  
collective

## **Safeguarding Policy including Prevent, Anti-bullying, Child and Vulnerable Adult Protection**

Date approved:	September		Review Date:		
Approved by:	FE Corporation				
Relevant to (please ✓):	✓ Vocational	✓ A Level	✓ HE	✓ NETA	✓ WBL
Signed (Lead Manager):	Peter Wood				
Print Name:	Peter Wood				

## **1 PURPOSE**

The purpose of the Safeguarding Policy is to provide a clear set of guidelines to learners, their parent/carers, staff and other workers within the College community, together with wider stakeholders, regarding how the College will discharge its safeguarding responsibilities, including with respect to the Prevent duty.

Please note that the term 'College' is used throughout this document and appendices, as a generic term that encompasses all organisations within the Education Training Collective 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 used throughout the policy and all appendices as a generic term that encompasses all groups of workers associated with the College group in any capacity, whether paid or unpaid.

## **2 Definitions**

A child is, any person under the age of 18.

Any person up to the age of 25 with a current Educational Health and Care Plan (EHCP) in place is treated as a child for the purposes of safeguarding & child protection legislation and for this policy and appendices. Learners age 18 or over are supported by adult services when making a safeguarding referral.

A vulnerable adult is deemed to be 'a person who is or may be in need of community care services by reason of mental or other disability, age or illness; and who is or may be unable to take care of him or herself, or unable to protect him or herself against harm or exploitation', The Care Act 2014..

All references to staff consist of teaching staff, other staff including agency staff and volunteers working in the organisation, visitors and includes contractors, regardless of position, role or responsibilities.

### **Legislation and statutory guidance**

- This policy is based on the Department for Education statutory guidance, Keeping Children Safe in Education 2023, Working Together to Safeguard Children 2018, updated 2022, and sexual violence and sexual harassment between children in schools and colleges. We comply with this guidance and the procedures set out by our Local Safeguarding Children partnerships and safeguarding adults board.

- The policy conforms to locally agreed multi-agency procedures. It is available to all interested parties on our website. It should be read in conjunction with other relevant policies and procedures and Keeping Children Safe in Education 2023.

This policy is also based on the following legislation:

- Section 175 of the Education Act 2002, which places a duty on colleges, schools and local authorities to safeguard and promote the welfare of pupils
- The School Staffing (England) Regulations 2009, which sets out what must be recorded on the single central record and the requirement for at least one person on a school interview/appointment panel to be trained in safer recruitment techniques
- The Children Act 1989 (and 2004 amendment), which provides a framework for the care and protection of children
- General Data Protection Act 2018
- Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the Serious Crime Act 2015, which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18
- Statutory guidance on FGM, which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM
- The Rehabilitation of Offenders Act 1974, which outlines when people with criminal convictions can work with children
- Schedule 4 of the Safeguarding Vulnerable Groups Act 2006, which defines what 'regulated activity' is in relation to children
- Statutory Guidance on the Prevent duty, which explains schools' duties under the Counter Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism
- Guidance for safer working practice for those working with children and young people in education settings (GSWP) (Safer Recruitment Consortium May 2019)
- South Tees Safeguarding Children Partnership and Hartlepool & Stockton Safeguarding Children's Partnership and Procedures
- Children Missing Education – Statutory guidance for local authorities (DfE September 2016) <https://www.gov.uk/government/publications/children-missing-education>

### **Safeguarding and promoting the welfare of children**

In relation to learners under the age of 18 years old, and classed as a child in law, the College has a statutory duty, as set out in the Education Act 2002 and Children Act 2004, to promote and safeguard the welfare of children and have due regard to guidance issued by the Secretary of State at all times. Safeguarding and promoting children and young people's welfare is:

- protecting children from maltreatment
- preventing the impairment of children's mental and physical health or development
- ensuring that children grow up in circumstances consistent with the provision of

- safe and effective care, and
- taking action to enable all children to have the best outcomes. (KCSiE 2023).

**Child protection** is part of this definition and refers to activities undertaken to prevent children suffering, or being likely to suffer, significant harm.

### **Safeguarding Adults**

In relation to learners 18 years and over, and classed as an adult in law, the College has a statutory safeguarding duty, as set out in the Care Act 2014, which must be seen in conjunction with Mental Capacity Act 2005 and the Human Rights Act 1998. The College must have regard to guidance issued by the Secretary of State at all times.

### **Vulnerable Adult**

The adult safeguarding duties under the Care Act 2014 apply to an adult, aged 18 or over, who:

- has needs for care and support (whether or not the Local Authority is meeting any of those needs) and
- is experiencing, or at risk of abuse or neglect; and
- as a result of those care and support needs is unable to protect themselves from either the risk of, or the experience of abuse or neglect.

### **All learners**

While a concern may not meet the threshold for a referral to and/or support of these external agencies, the College is committed to the safeguarding and supporting all learners as appropriate.

### **Equality statement**

Some learners have an increased risk of abuse, and additional barriers can exist for some learners with respect to recognising or disclosing it. At the ETC, we are committed to anti-discriminatory practice and recognise learners' diverse circumstances. We give special consideration to pupils who:

- Have special educational needs or disabilities
- Are young carers
- May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
- Have English as an additional language
- Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence
- Are at risk of Female Genital Mutilation (FGM), sexual exploitation, criminal exploitation, forced marriage, or radicalisation
- Are asylum seekers, refugees or migrants

- Are children in the care of the local authority or are Care Experienced Learners
- Have a Child Protection Plan, or Child in Need Plan
- May benefit from Early Help support.

### **3 Statement of Intent**

- The College will ensure that:
- Appropriate action is taken in a timely manner to safeguard and promote learners' welfare
- All staff are aware of their statutory responsibilities with respect to safeguarding
- Staff are properly trained in recognising and reporting safeguarding issues
- The Governing Body and staff take as our first priority the responsibility to safeguard and promote the welfare of our learners, to minimise risk and to work together with other agencies to ensure rigorous arrangements are in place within our College to identify, assess and support those children who are suffering harm and to keep them safe and secure whilst in our care.
- The responsibilities set out in this policy apply (as appropriate) to all members of the College community including learners, staff, governors, visitors/contractors, volunteers and trainees working within the College.

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Safeguarding is fully incorporated into the whole College ethos and is underpinned throughout the teaching of the curriculum, within the tutorial programme and within the safety of the physical environment provided for learners.

Safeguarding can involve a range of potential issues such as (but not limited to):

- Neglect, physical abuse, sexual abuse and emotional abuse.
- Contextualised abuse.
- Homelessness
- Bullying, including online bullying (by text message, on social networking sites, and prejudice-based bullying).
- Racist, disability- based, homophobic, bi-phobic or transphobic abuse.
- Gender based violence/violence against women and girls.
- Extremist behaviour and/or radicalisation.
- Child sexual exploitation (CSE), human trafficking, modern slavery or other forms of exploitation.
- Online abuse
- Child on Child Sexual Violence and Sexual Harassment (defined in KCSiE 2023 Part Five).
- Issues which may be specific to a local area or population, for example knife crime, youth violence, criminal child exploitation (CCE) and County Lines.
- Parental vulnerabilities such as substance /alcohol misuse, mental health issues and domestic abuse.
- Risk of or from serious violence and violent crime

- Particular issues affecting learners including domestic abuse and violence within their own relationships, female genital mutilation, so called honour-based abuse and forced marriage.
- 'Upskirting' - The Voyeurism (Offences) Act, which is commonly known as
- Upskirting Act, came into force on 12th April 2019. Upskirting is a criminal offence and reportable by all staff.

**Please see appendix A for Definitions and Indicators of abuse.**

The College recognises the links between the Teachers Standards (2011) which sets out the expectation that, *all teachers manage behaviour effectively to ensure a good and safe educational environment and requires teachers to have a clear understanding of the needs of all pupils.*

The College fully recognises its responsibilities to safeguard and promote the welfare of children, young people and adults, including the responsibilities of its Governors, staff and volunteers regarding the protection of young people and adults from abuse; and to have due regard to the need to prevent people from being drawn into radicalised behaviour and potential acts of terrorism.

*The College is committed to safeguarding and promoting the welfare of young people and adults and expects all learners and all staff (including agency and hourly paid staff), irrespective of anyone's position or role in the College, together with Governors, any workers who are at the College on an agency, voluntary/placement/other professional basis and any subcontractors or partners of the College, to share this commitment.*

- We believe that everyone should be safe, and feel safe; and we want everyone who attends or has contact with the College to enjoy what the College has to offer in safety.
- We want to make sure that our learners know this and are empowered to tell us if they have suffered, or are suffering, from any form of harm or abuse, if they feel at risk of being drawn into terrorism or extremism, or if they have concerns about any other College user in respect of these matters.
- We want organisations who work with, or commission work from the College, to have confidence and recognise that we are a safe organisation.
- We believe that children who may be LGBT+ should have a trusted adult who they can be open with, including having a LGBT+ group within the college trust.
- We want all learners studying with us to see themselves as a valued part of the College community and to understand how this community operates within the wider UK community, including the importance of promoting, and abiding by, the fundamental British values of:
  - Democracy: your vote and voice counts; *you can make a difference.*
  - The rule of law: *laws apply to everyone.*
  - Individual liberty: *you are entitled to your view and to your freedom of expression and thought, and so is everyone else.*

- Mutual respect and tolerance for those with different faiths and beliefs. We are an inclusive organisation where everyone is respected.
- We enable learners, through the Personal Development curriculum and other support activities, to develop the skills they need to stay safe from harm. We aim to help them to develop the confidence they need to speak up for themselves and others. We provide effective support, guidance and care if a learner shares a concern with us.
- We will ensure that all contractors or their employees who undertake work at the College will have a Disclosure barring service (DBS) check in place. Where that work falls into the scope of regulated activity the DBS will be enhanced. In circumstances where no checks are in place, the contractor and/or employee(s) will be appropriately supervised and will not be allowed to take part in any regulated activity. Where a contractor is self-employed the College will consider making its own DBS check (KCSiE 2023).
- The College will maintain an effective Safeguarding Policy which brings together all aspects of safeguarding and child protection, and includes the College's Prevent duty. The policy, and all appendices, will be updated at least yearly, or in line with changes in legislation and guidance, to make sure it is current and effective.

**The College has clear objectives:**

- To provide a safe environment for children, young people and adults in which to work, learn and take part in social and recreational activity.
- To identify people who are experiencing, or likely to experience significant harm, providing support and taking appropriate action with the objective of producing positive outcomes for those people.
- To foster, promote and maintain a genuine feeling of safety throughout the College via the curriculum, pastoral support, and appropriate working practices through the promotion of a college ethos where everyone feels safe, secure, valued and listened to.
- To act where appropriate to safeguard the person through working in partnership with other agencies.
- To educate all learners and staff in safeguarding and child protection issues so that they become more aware and confident in dealing with issues relating to those matters.

**The College has processes which:**

- Identify children, young people and adults at risk of significant harm, or where there are concerns for a person's welfare, and provide procedures for reporting and addressing such concerns.
- Prevent unsuitable people from working with children, young people and adults.
- Identify procedures for reporting unsuitable people to the DBS and other relevant agencies where appropriate.
- Maintain channels for reporting and dealing with all allegations of abuse.
- Work in partnership with local agencies including the sharing of information.
- Provide a safe environment for children, young people and adults within the College.
- Appropriately filter and monitor student internet usage.

- Identify low level concerns.

**The College will ensure that:**

- There is a named Senior Management Team Lead who is responsible for college safeguarding arrangements, together with the named Designated Safeguarding Lead (DSL). There is cross College safeguarding team led by the Safeguarding & Welfare Manager with a named officer for Safeguarding on each College site (Deputy DSLs) (see table – page 10).
- The Designated Safeguarding Lead leads on all matters pertaining to safeguarding and child protection, and will ensure that appropriate and robust systems are in place to coordinate reporting, monitoring, referral and support procedures. Name, role and contact details will be available to all staff, learners and parents/carers on the College website.
- All staff are trained to Recognise, Respond, Record, Report and Refer in regard to Safeguarding procedures with training updates provided on an annual basis. Induction training that includes safeguarding procedures and Part One of Keeping Children Safe in Education September 2023. In addition to this, staff induction will include, as a minimum, the student Relationships & Behaviour policy, the Staff Code of Conduct and the role and identities of the Safeguarding team and will be mandatory for all new staff working in the College.
- Accurate and secure records of concerns about individuals are made, even when there is no need for immediate referral to outside agencies.
- There is a systematic means of monitoring children, young people and adults known, or thought to be, at risk of harm, and the College contributes to assessments/support plans with other agencies.
- Sources of help and support are accessible for anyone who may experience abuse.
- There are effective working relationships with other agencies, and in particular the South Tees Safeguarding Children Partnership and the Hartlepool & Stockton Safeguarding Children's Partnership.
- Staff are trained in safe practices to protect children, young people and adults in the learning environment, and also to protect themselves from false allegations of abuse, including raising awareness of sexual violence and sexual harassment in college, by peers. Please see Appendix L.
- Safe recruitment practices are in place by implementing enhanced checks on all new and existing staff in accordance with the DBS, taking of references, and training interviewers in accordance with Department of Education guidance to effectively establish suitability for role at the time of employment.
- Effective induction, tutorial and enrichment opportunities are provided for learners. The curriculum (both formal and informal) will be used to help children, young people and adults to develop their self-esteem, assertiveness, problem-solving skills, raise awareness of risk, including sexual violence and sexual harassment from peers, and local threats. This to promote their resilience, confidence, self-esteem and self-awareness and to be able to ask for help if it is needed.



## **Roles and Responsibilities**

### **The Governing Body is responsible for:**

Strategic leadership of the College's safeguarding arrangements and ensuring that they comply with their duties under legislation.

Ensuring policies, procedures and training are effective and comply with the law at all times.

Ensuring a senior board level (or equivalent) holds leadership responsibility for the College's safeguarding arrangements.

Ensuring that all governors and staff receive appropriate safeguarding and child protection (including online) training at induction. Their training should be regularly updated.

### **The Governing Body should:**

Appoint a Lead Governor with responsibility for safeguarding, child and adult protection.

Be aware of their obligations under the Human Rights Act 1998 21, the Equality Act 2010/22, (including the Public Sector Equality Duty), and their local multi-agency safeguarding arrangements, that is the South Tees Safeguarding Children's Partnership and Hartlepool & Stockton Safeguarding Children's Partnership.

Be aware that the Data Protection Act 2018, and the UK General Data Protection Regulation (UK GDPR) place duties on organisations and individuals to process personal information fairly and lawfully and to keep the information they hold safe and secure.

Ensure they facilitate a whole College approach to safeguarding. Ultimately, all systems, processes and policies should operate with the best interests of the child at their heart.

To support schools and colleges to meet the Prevent duty, the Department for Education has published filtering and monitoring standards.

Governing bodies and proprietors should:

Review the standards and discuss with IT staff and service providers what more needs to be done to support schools and colleges in meeting this standard. (Para 142)

Ensure their school or college has appropriate filtering and monitoring systems in place and regularly review their effectiveness. (Para 141)

Ensure that all staff undergo safeguarding and child protection training (including online safety which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring. (KCSiE 2023, Para 124)

Where there is a safeguarding concern, the governing body should ensure the child's wishes and feelings are taken into account when determining what action to take and what services to provide.

Ensure there are appropriate policies and procedures in place in order for appropriate action to be taken in a timely manner to safeguard and promote children's welfare.

These policies should include the College having:

An effective child protection policy, a behaviour policy, a staff behaviour policy and appropriate safeguarding arrangements in place to respond to children who are absent from education, particularly on repeat occasions and/or for prolonged periods.

Systems should be in place, and they should be well promoted, easily understood and easily accessible for children to confidently report, any form of abuse or neglect, knowing their concerns will be treated seriously, and knowing they can safely express their views and give feedback.

**In addition, the governing body should ensure:**

- Child protection files are maintained
- Appropriate safer recruitment policies in accordance with Part three of this guidance are in place, embedded and effective and,
- Where reasonably possible, colleges hold more than one emergency contact number for each pupil or student

Full responsibilities of the governing body are set out in Keeping Children Safe in Education 2023, part two.

**The Group Executive Principal should ensure through the Senior Management Team that:**

- There is a consistent and high profile lead on all safeguarding issues.
- Promote the College's approach to safeguarding inside and outside the College.
- All staff undertake appropriate safeguarding and child protection training and are informed of this policy at induction.
- The safeguarding policy and supporting policies and procedures are understood and fully implemented and followed by all staff
- This policy is communicated to parents and carers via the College website.
- Sufficient resources and time are allocated so that the DSL and Deputy DSL's can attend strategy discussions, interagency meetings, contribute to assessments etc
- Make referrals to the Local Authority Designated Officer where allegations of abuse by staff are brought forward, or delegate that responsibility to the HR Manager or DSL where required
- Staff/volunteers feel able to raise concerns about poor/unsafe practices by addressing these sensitively and effectively in a timely manner in accordance with public interest disclosure policies
- The operation of safe recruitment and checks on new staff and volunteers is completed
- The reporting of cases to the Secretary of State. In cases where a person ceases to work in an education setting and there are grounds for believing he/she may be unsuitable to work with children or may have committed misconduct the employer must consider whether to refer the case to the Secretary of State (via the Teaching Regulation Agency). The Secretary of State will consider whether to prohibit the person from working with children in the future or place restrictions on their employment in educational establishments. FE institutions have a statutory duty to make reports, and to provide relevant information to the Secretary of State.
- There must be procedures in place to make a referral to the Disclosure and Barring Service (DBS) if a person in regulated activity has been dismissed or removed due to safeguarding concerns or would have been had they not resigned. This is a legal duty and failure to refer when the criteria are met is a criminal offence.

Please see Appendix M

### **Role of the College Safeguarding Management Group**

Oversight of all College safeguarding arrangements is through the College Safeguarding Management Group. This group is chaired by the College Group Director of Quality and includes representation from the Governing Body. The group has a diverse membership and provides an effective forum for the monitoring, review and shaping of College safeguarding arrangements.

### **Role of the Designated Safeguarding Lead:**

- Take lead responsibility in all safeguarding and child/ adult protection matters, including online safety and understanding the filtering and monitoring systems that are processes in place. This should be explicit in the job description. (KCSiE 2023, Para 103). Provide advice and support to other staff on child welfare, safeguarding and child and adult protection matters.
- Take part in inter-agency meetings, and/or supporting other staff to do so, and contributing to the assessment of children, such as in Strategy meetings, Initial and Review Child Protection Conferences, Planning/ Core Group Meetings and Team Around the Family meetings.
- Be available to discuss any safeguarding concerns alongside the Deputy DSLs.
- Refer cases of suspected abuse or allegations to the relevant investigating agencies including Multi-agency Children's Hubs, Adult Social Care, Channel, Police – this responsibility can be delegated to the Advanced Safeguarding Practitioner at each College site.
- Act as a source of support, advice and expertise within the College and a point of contact with safeguarding partners.
- Liaise with Group Principal and Link Governor to inform of any issues/ongoing investigations.
- Act as the Group Principal's/ HR Manager's delegate with Local Authority Designated Officer in reporting and managing cases of alleged staff abuse as appropriate and when required.
- Liaise with staff including SENDCO/ High Needs team, Senior Mental Health Lead, on matters of safety and welfare (including online and digital safety) and when deciding to a referral to relevant agencies.
- Promote supportive engagement with parents/ carers.
- Promote educational outcomes by ensuring managers know the names of their cohort of vulnerable learners and the welfare, safeguarding and child protection issues that children are experiencing. Train staff in how to recognise signs of abuse, including sexual violence & sexual harassment between peers, and when it is appropriate to make a referral. Training should be updated on an annual basis.
- Liaise with t Group and College Principals to inform them of issues - especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations. This should include being aware of the requirement for children to

have an Appropriate Adult. Further information can be found in the Statutory guidance - PACE Code C 2019.

- Ensure all staff have access to and understand the College Safeguarding policy, and to make it available in a range of formats
- Ensure that child protection and all other safeguarding written records of referrals/concerns are kept up to date, are kept confidential and stored securely.
- Raise awareness ensuring that all staff have access to and understand the safeguarding and child protection policy, that the policy is reviewed annually,
- Provide support and advise staff and help them feel confident on welfare, safeguarding and child protection matters.
- Ensure learners/parents/carers have access to copies of the College Safeguarding policy, which alerts them to the fact that referrals may be made and the role of the College in this. Also that contact details for the Safeguarding Team, and the role of the establishment are available on the College website.
- Designated safeguarding leads (and deputies) should be supported in developing knowledge and skills to understand the views of children.
- Ensure that Safeguarding team members involved in direct case work with vulnerable learners have access to regular safeguarding supervision.
- Where a young person leaves an establishment, ensure the file/information is transferred to a new establishment in line with the Working Together to Safeguard Children Guidance.
- Provide an annual report to Board of the Corporation
- Have access to resources and attend relevant or refresher training courses, including Prevent awareness training, and to update training annually.

The full responsibilities of the DSL are set out in Appendix C of Keeping Children Safe in Education 2023.

### **The Designated Teacher for Care Experienced Learners (previously known as Looked After Children):**

The Children and Social Work Act of 2017, places responsibilities for 'designated teachers' to have responsibility for promoting the educational achievement of children who have left care through adoption, special guardianship or child arrangement orders or who were adopted from state care outside England and Wales. The DSL holds responsibility for promoting the educational achievement of children who are Care Experienced. They will have the appropriate training to carry out this role effectively and will work with the Virtual School to ensure that the progress of each student is supported. We recognise those learners who were previously children in the care of the local authority (Children in Our Care, CiOC), potentially remain vulnerable and all staff will be informed of the importance of maintaining support for them through their time in college. PEP meetings with the Virtual Schools for all Care Experienced learners will be attended and progress / concerns discussed and logged.

- **All Staff** Safeguarding and promoting the welfare of children is everyone's responsibility. Everyone who comes into contact with children and their families has a role to play.
- All staff have responsibility to provide a safe environment in which children can learn.
- All staff should be aware of systems within College which support safeguarding.
- All staff should be prepared to identify children who may benefit from Early Help, or who are suffering or likely to suffer significant harm.
- All staff should be aware of the early help process and understand their role in it.
- All staff have a responsibility to take appropriate action as described in this policy, working with other services as needed.
- All staff should receive appropriate safeguarding and child protection training (including online safety which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring, at induction. The training should be regularly updated.) (KCSiE 2023, Para 124)
- All staff should know the signs of abuse and neglect, as well as specific safeguarding issues such as signs of radicalisation.
- All staff should know what to do if a child tells them they are being abused, exploited, or neglected.
- All staff should be able to reassure victims that they are being taken seriously and that they will be supported and kept safe.
- All staff should be aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. This should not prevent staff from having a professional curiosity and speaking to the designated safeguarding lead if they have concerns about a child. KCSiE 2023.
- All staff working directly with children must read at least Part one, those staff who do not work directly with children must read Annex A, of KCSiE 2023.

Please see Annex A For Definitions and Signs of Abuse.

#### **Responding to a concern.**

- All staff are responsible for safeguarding one another and our learners.
- Staff must have an attitude of 'it could happen here' where safeguarding is concerned.
- Staff must remain vigilant to concerns rather than waiting for a disclosure, recognising that learners may not always make a direct disclosure and information may come from overhearing conversations or observing behaviour changes.
- Staff must act immediately on any concerns they have and always in the best interests of the learner by sharing concerns with a member of the Safeguarding Team.

#### **Where a student makes a disclosure to a member of staff they should do the following:**

- Stay calm, do not express shock or embarrassment
- **Listen carefully to what they say and how they say it**
- **Allow the learner to explain in their own words and do not ask leading questions**
- **DO NOT** offer confidentiality, but be clear that you will explain what will happen next.

- Explain that you will need to share this information with a member of the Safeguarding Team.
- **GIVE REASSURANCE** that you are taking the information seriously
- **DO NOT** examine any physical injuries
- If sexualised images are included in the disclosure, do not ask to view them or ask the learner to send them. Report this to the safeguarding team member when you share the disclosure.
- **DO NOT** attempt to investigate the allegations yourself
- **NEVER JUDGE** – even if the allegation is against a colleague
- **RECORD** what was said, also time, date and place.
- **CONTACT** a member of the Safeguarding Team as soon as is reasonably possible
- **Once the Safeguarding Team are informed, do not discuss the issue any further with the student or any other staff member.**

#### KEY SAFEGUARDING CONTACTS

Nominated Governor for safeguarding	<b>Gary Wright</b> Contact via Sarah Thompson (Clerk to the Governors) <ul style="list-style-type: none"> <li>• Email <a href="mailto:sarah.thompson@the-etc.ac.uk">sarah.thompson@the-etc.ac.uk</a></li> <li>• Telephone – 01642 865415</li> </ul>
Senior Board Lead responsible for college safeguarding arrangements	<b>Grant Glendenning</b> Group Principal and Chief Executive Officer Contact via Cath Turner (Executive Team and Secretariat Manager) <ul style="list-style-type: none"> <li>• Email <a href="mailto:Catherine.turner@the-etc.ac.uk">Catherine.turner@the-etc.ac.uk</a></li> <li>• Telephone – 01642 865401</li> </ul>
Senior Leadership Team member with oversight of college safeguarding arrangements (Chair of the College Safeguarding Management Group)	<b>Peter Wood</b> Group Director of Quality Contact via Alice May Appleby (Group Quality Coordinator) <ul style="list-style-type: none"> <li>• Email – <a href="mailto:alice-may.appleby@the-etc.ac.uk">alice-may.appleby@the-etc.ac.uk</a></li> <li>• Telephone – 01642 865401</li> </ul>
Designated Lead for Safeguarding	<b>Sue Everton</b> Group Head of Student Support & Wellbeing <ul style="list-style-type: none"> <li>• Email – <a href="mailto:sue.everton@the-etc.ac.uk">sue.everton@the-etc.ac.uk</a></li> <li>• Tel: 01642 865400 M: 07860860986</li> </ul>
Student Support and Wellbeing Manager - Safeguarding and Welfare	<b>Daniel Mahmoodshahi</b> Student Support and Wellbeing Manager - Safeguarding and Welfare <ul style="list-style-type: none"> <li>• Email – <a href="mailto:daniel.mahmoodshahi@stockton.ac.uk">daniel.mahmoodshahi@stockton.ac.uk</a></li> <li>• Telephone - M: 07395795711</li> </ul>
Safeguarding Practitioner – Stockton Riverside College	<b>Alice Reid</b> Advanced Safeguarding Practitioner

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Advanced Safeguarding Practitioner - Redcar and Cleveland College	<p><b>Tracy Williams</b> Advanced Safeguarding Practitioner</p> <ul style="list-style-type: none"> <li>Email – <a href="mailto:tracy.williams@cleveland.ac.uk">tracy.williams@cleveland.ac.uk</a></li> <li>Telephone – 01642 777230 / 07702 515472</li> </ul>
Advanced Safeguarding & Welfare Practitioner – The Skills Academy	<ul style="list-style-type: none"> <li><b>Katie Todd</b></li> <li>Advanced Safeguarding Practitioner</li> <li>Email – <a href="mailto:katie.todd@stockton.ac.uk">katie.todd@stockton.ac.uk</a></li> <li>Telephone – 07590 864913</li> </ul> <p><b>Daniel Mahmoodshahi</b> Student Support and Wellbeing Manager - Safeguarding and Welfare</p> <ul style="list-style-type: none"> <li>Email – <a href="mailto:daniel.mahmoodshahi@stockton.ac.uk">daniel.mahmoodshahi@stockton.ac.uk</a></li> <li>Telephone - M: 07395795711</li> </ul>
Safeguarding – NETA Training Group	<p><b>Leanne Keane-Barker</b> Advanced Safeguarding and Welfare Practitioner</p> <ul style="list-style-type: none"> <li>Email - <a href="mailto:Leanne.keane-barker@stockton.ac.uk">Leanne.keane-barker@stockton.ac.uk</a></li> <li>M: 07702521009</li> </ul> <p><b>Katie Todd</b> Advanced Safeguarding Practitioner</p> <ul style="list-style-type: none"> <li>Email – <a href="mailto:katie.todd@stockton.ac.uk">katie.todd@stockton.ac.uk</a></li> <li>Telephone – 07590 864913</li> <li></li> </ul>
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Cross College Lead – Learners with Education and Health Care Plans and/or High Needs	<p><b>Alexa Lang</b> High Needs Manager</p> <ul style="list-style-type: none"> <li>Email – <a href="mailto:alexa.lang@the-etc.ac.uk">alexa.lang@the-etc.ac.uk</a></li> <li></li> </ul>

## Safeguarding Out of Hours and Holiday Cover Arrangements

All and any safeguarding concerns should be reported to the Safeguarding Team throughout the academic year. Cover arrangements are in place for holiday periods during college hours (with the exception of college closure periods). During which time the safeguarding inbox will be periodically checked.

In a case where a learner may be in imminent danger outside of regular working/College hours, the Police, Social Care or NSPCC should be contacted using the links specified below. The safeguarding team should be made aware of any such actions to ensure that the College is able to record and follow up on safeguarding concerns.

For concerns about personal safety, contact the Police 999 (emergency) or 101 (non-emergency). For concerns regarding health and wellbeing, contact your out of hours Doctors or call the NHS Direct on 111.

For out of hours Social Care support for children (under 18) and adults, contact the out of hours service on 01642 524552, making sure to contact the out of hours Social Care service from the area where they live.

For safeguarding concerns relating to learners under the age of 18, staff can also contact the NSPCC on 0808 800 5000 or [help@nspcc.org.uk](mailto:help@nspcc.org.uk).

Please Appendix J

### Early Help

Early help means providing support as soon as a problem emerges at any point in a child's life. Where a child would benefit from co-ordinated early help, an early help inter-agency assessment should be arranged. The Safeguarding Team will be responsible for identifying and implementing any Early Help measures which are required.

Any child may benefit from early help, but all college staff should be particularly alert to the potential need for early help for a child who:

is disabled or has certain health conditions and has specific additional needs

- has special educational needs (whether or not they have a statutory Education, Health and Care plan)
- has a mental health need
- is a young carer
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines
- is frequently missing/goes missing from care or from home
- is at risk of modern slavery, trafficking, sexual or criminal exploitation
- is at risk of being radicalised or exploited
- has a family member in prison, or is affected by parental offending
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse



- is misusing alcohol and other drugs themselves
- has returned home to their family from care
- is at risk of so-called 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage
- is a privately fostered child, or
- is persistently absent from education, including persistent absences for part of the school day.

Please see Appendix I

### **Multi-agency working and Information Sharing**

In accordance with the requirements of "Working Together to Safeguard Children (2022)" and 'The Care Act Statutory Guidance (2014)' and GDPR, we will share information about safeguarding concerns with other relevant agencies on a need to know basis. In addition, other relevant agencies may contact us for information that we hold in relation to a learner. Any requests around learner details or information in relation to a safeguarding concern should be referred immediately to the central Safeguarding Team so that a prompt decision can be made about what information can and will be shared.

We will work in partnership with Hartlepool and Stockton Safeguarding Children's Partnership and South Tees Safeguarding Children's Partnership, in accordance with the requirements of the Children Act 1989 amended 2004. We will share information appropriately and contribute to Strategy meetings, Section 17 and Section 47 assessments, Initial Child Protection Conferences and Review meetings, Core groups and Team Around the Family meetings. In the best interests of our learners, we will work with all relevant professionals and agencies as required to safeguard children and adults, and promote their welfare. All safeguarding referral protocols will reflect the guidance laid down in Part 1 of KCSiE 2023, including Prevent referrals to Channel.

### **Record Keeping and GDPR**

- Timely information sharing is essential for effective safeguarding.
- All concerns, discussions and decisions made, and the reasons for those decisions, will be recorded electronically. Information will be kept confidential and stored securely. Records will include; 1. A clear comprehensive summary of the concern 2. Details of how the concern was followed up and resolved 3. A note of any action taken, decisions reached and the outcome
- The storing and processing of personal data is governed by the General Data Protection Regulations 2017 (GDPR) and Data Protection Act 2018.

Staff may have access to special category personal data about pupils and their families which must be kept confidential. Records should only be shared with those who have a legitimate professional need to see them.

### **Working with parents and other agencies to protect children**

Parents/carers should be aware that our College will take any reasonable action to safeguard the welfare of its learners. In cases where the College has reason to be concerned that a student may be suffering significant harm, ill treatment or neglect or other forms of harm, staff have no alternative but to follow the local Safeguarding Children's Partnership procedures.

See Tees Safeguarding Children website for more details:  
<https://www.teescpp.org.uk>

In line with Keeping Children Safe in Education 2023 (KCSiE) we will endeavour wherever possible to obtain at least two emergency contacts for every child in the College in case of emergencies, and in case there are welfare concerns at the home.

In general, we will discuss concerns with parents/carers before approaching other agencies and will seek to inform parents/carers and receive their consent when making a referral to another agency. The exception to this rule will be in situations where a member of staff has reasonable cause to believe that informing parents/carers of a referral to another agency may increase the risk of significant harm to the learner.

Parents/carers are informed about the College safeguarding policy on the College website. Safeguarding, child protection and Prevent posters are displayed in throughout the College.

### **Student and parent access to child protection files**

Under Data Protection legislation (General Data Protection Regulation & Data Protection Act 2018) a student or their nominated representative have several legal rights in respect of information relating to them. These rights include the right to access and the right to rectification of inaccurate data. Therefore, it is important to remember that all information should be accurately recorded, objective in nature and expressed in a professional manner.

### **Our role in the prevention of abuse**

The College plays a crucial role in preventative education. Preventative education is most effective in the context of a whole College approach that prepares learners for life in modern Britain and creates a culture of zero tolerance of sexism, misogyny/misandry, homophobia, biphobic and sexual violence/harassment, discrimination and prejudice linked to fundamental values. We identify and provide opportunities for learners to develop skills, concepts, attitudes and knowledge to promote their safety and well-being through the Personal Development Curriculum.

### **Risk assessments**

The College uses risk assessments to inform the planning of safeguarding activities. This may include individual learner risk assessments where the needs or circumstances of the individual dictate that completion of a risk assessment would be beneficial. There may be occasions when the College assesses the risk of an individual as too high for the College to manage the risk at that time. If this is the case, this will be communicated to the individual along with the reason(s). If the individual wishes to appeal the decision, they may do so by following the College's complaints procedure. In some cases, the risk assessment may indicate that it is possible for the learner to be engaged in an online learning programme. Risk assessments are reviewed and updated on a regular basis as needs demand and at least once every year.

### **Abuse and neglect**

All staff should be aware of indicators of abuse and neglect, understanding that children can be at risk of harm inside and outside of the school/college, inside and outside of home, and online.

Abuse can take many forms including emotional, physical, sexual and mental. Whilst it is more common for there to be a perceived disproportionate power differential between abuser(s) and abusee(s), child on child abuse is a significant issue. It must never be tolerated or treated as 'banter' or just 'part of growing up.'

Please see Appendix A for Definitions and Indicators of Abuse.

### **Children Potentially at Greater Risk of Harm**

Some learners are potentially at greater risk of harm than others, both online and offline. This includes those belonging to groups below. It also includes learners living with domestic abuse at home or it might be due to parental substance or alcohol misuse.

### **Children with a social worker (Child in Need and Child Protection plans) and Children in the care of the Local Authority, referred to Children in Our Care (CiOC), Care Leavers and Care Experienced learners.**

We recognise that this group of learners are more vulnerable than other learners, often having poorer educational outcomes. The College will work in close collaboration with local authorities to ensure that all learners with a social worker are identified and we use this information to ensure that decisions are made in the best interests of the learners' safety, welfare and educational outcomes.

The College will work in close collaboration with the Virtual School Headteachers and Children's Social Services to ensure all CiOC and Care Experienced children are identified and offered appropriate support mechanisms.

Governing bodies of maintained schools and proprietors of academies must appoint a designated teacher and should work with local authorities to promote the educational achievement of registered pupils who are looked after. The Designated Teacher for Children in the Care of the Local Authority and care leavers, is the Group Head of Student Support & Wellbeing.

Please see Appendix F.

### **Children 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. It is important College's response to persistently absent pupils and children missing education supports identifying such abuse, and in the case of absent pupils, helps prevent the risk of them becoming a child missing education in the future. (KCSiE 2023, Para 175)

Where learners age 19 or under, or 25 or under with an EHCP, are displaying erratic attendance, regular absences, or other unusual attendance patterns, the College will ensure that staff follow up with parent/carers to ensure a full understanding of the underlying reasons is gained, acted upon, and recorded where appropriate.

**Please see Appendix B.**

**Curriculum Teams must maintain contact with learners.**

Where learners are absent for two weeks without contact and all methods of contact have been unsuccessful, staff will complete the Risk of NEET form and forward to the Safeguarding Team. This is in addition to any safeguarding actions that will already have been taken.

In cases where a safeguarding concern is known or suspected, the Safeguarding Team will undertake the appropriate referrals to relevant external agencies. All such cases will be recorded and monitored using the existing referral and case management procedure.

**Attendance Monitoring**

To enable safe and effective safeguarding processes, registers of attendance should be completed for each appropriate session; this should be done in a timely fashion (ideally in the first 15 minutes of that session). Where a digital register is not possible (such as remote or outdoor working), a paper record may be used temporarily. Recurrent absence, patterns of absence, absence without notification and absence where a learner leaves their learning activity part way through the day, can all be indicators of possible safeguarding issues. Curriculum areas should monitor and follow-up on attendance following Attendance Policy.

**Children requiring mental health support.**

The College has an important role to play in supporting the mental health and wellbeing of learners. Mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. The Safeguarding & Welfare Manager is the Mental Health Lead for the College Group. He is supported by the Designated Safeguarding Lead/ Group Head of Student Support & Wellbeing. The safeguarding team support learners and refer to mental health support for planned and crisis support.

**Children with special educational needs, disabilities or health issues**

Learners with SEND are more likely to be abused and/or neglected. The College will monitor and support these learners in order to ensure they are appropriately identified and supported.

The College will ensure that all staff have an awareness that:

- Behaviour, mood and injury may relate to potential abuse, and may not be as a result of the learner's condition
- Learners with SEND needs or certain medical conditions are more prone to peer group isolation and bullying, without outwardly showing any signs
- Communication difficulties may impact learners with SEND or certain medical needs from reporting these challenges
- Cognitive understanding – being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in schools or colleges or the consequences of doing so.

Where learners with special educational needs, disabilities or health issues are identified as needing support from the Safeguarding Team, the High Needs/ SEND Team (who can provide additional information about specialist organisations) will be informed and consulted to ensure needs are fully met. (KCSiE 2023 Para 202).

### **Children who identify as lesbian, gay, bi, or trans (LGBTQ+)**

The fact that a child or a young person may be LGBTQ+ is not in itself an inherent risk factor for harm. However, children who are LGBTQ+ can be targeted by others. In this College, we, therefore, endeavour to reduce the additional barriers faced, and provide a safe space for learners who identify as LGBT+ to speak out or share their concerns with members of staff.

### **Private Fostering.**

The college will ensure that responsibilities in terms of private fostering are met in full. Private fostering occurs when a child under the age of 16 (under 18 for children with a disability) is provided with care and accommodation by a person who is not a parent, person with parental responsibility for them or a relative in their own home. for more than 28 days and where the care is intended to continue. It is a statutory duty for us at the College to inform the Local Authority Children's Services where we are made aware of a young person who may be subject to a private fostering arrangement.

### **14 – 16s in College**

Some learners studying at College are aged between 14-16 years old and will be in the equivalent to Years 10 & 11 of secondary school. The College will ensure that all 14–16-year-olds are cared for and have their wellbeing needs met appropriately.

Where children are on the roll of another education establishment it is agreed that there will be strong communication between the College Designated Safeguarding Lead and the Designated Safeguarding Lead at these establishments regarding unexplained absence or other concerns. There will also be liaison with the parent(s)/carer and the schools.

Young people will be supervised at all times during timetabled sessions and a designated area made available to them during other periods.

The College will ensure that all staff have an effective understanding of the local context, and all safeguarding training will acknowledge and reference the local context to ensure that staff are adequately prepared to manage such issues that arise from this.

### **Online safety**

The College's approach to online safety is reflected in this policy which, includes appropriate filtering and monitoring on College devices networks. (KCSiE 2023, Para 138).

At the ETC we believe that an effective whole College approach to online safety empowers us to protect and educate learners, and staff in their use of technology and establishes mechanisms to identify, intervene in, and escalate any concerns where appropriate. The

breadth of issues classified within online safety is considerable and ever evolving, but can be categorised into four areas of risk:

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

**Contact:** being subjected to harmful online interaction with other users; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.

**Conduct:** online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images (e.g. consensual and nonconsensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying, and

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

Some online risks may lead to the learner being harmed and/or becoming involved in illegal activity including, but not limited to, radicalisation, cyberbullying, hate crime, non/consensual sharing of semi-nude and nude images and/or videos, revenge pornography, harassment, cybercrime, selling and distributing illegal drugs.

We use the Department for Education's filtering and monitoring standards which set out that colleges should:

- Identify and assign roles and responsibilities to manage filtering and monitoring systems
- The designated safeguarding lead should take lead responsibility for safeguarding and child protection (including online safety and understanding the filtering and monitoring systems and processes in place). This should be explicit in the role holder's job description.
- Review filtering and monitoring provision at least annually.
- Block harmful and inappropriate content without unreasonably impacting teaching and learning.
- Have effective monitoring strategies in place that meet their safeguarding needs, (KCSiE 2023, Para 142).

We filter and monitor all internet usage within the College in a responsible and transparent way in order to ensure and maintain the safety of staff and learners. We constantly review our processes and methods of filtering and monitoring. We ensure that all staff receive appropriate safeguarding and child protection training (including online safety which,

amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring.  
(KCSiE 2023 Para 14)

Learners receive information about keeping safe online in lessons held in the LRC and via tutorials.

We ensure that staff and learners are aware of and adhere to the protocols for online working.

We ensure staff and learners know how to work safely online.

Please see Appendix E.

### **Social Media**

The College recognises that the use of social media by young people has grown exponentially, and that social media has become a focus for a number of issues including cyber-bullying, sharing of nudes and semi-nudes, sharing of inappropriate images, the promotion of radical and extreme viewpoints, grooming, Child Sexual Exploitation (CSE) and Child Criminal Exploitation) CCE). All staff will be trained to be vigilant of and sensitive to this area of activity and the College will ensure that suitable IT policies are in place to address access and monitoring of social media activity.

**It is expressly forbidden for staff to either share their personal contact details with existing learners or seek to befriend/accept friend requests from existing learners on any social media platform.** This includes the sharing of personal mobile telephone details, personal e-mail addresses and any personal contact information. Any member of staff found to be in breach of this will be liable to disciplinary action. Please see Staff Code of Conduct.

### **Cybercrime**

Cybercrime is criminal activity committed using computers and/or the internet. It is broadly categorised as either 'cyber-enabled' (crimes that can happen off-line but are enabled at scale and at speed on-line) or 'cyber dependent' (crimes that can be committed only by using a computer). Cyber-dependent crimes include:

- Unauthorised access to computers (illegal 'hacking'), for example accessing a College's computer network to look for test paper answers or change grades awarded
- 'Denial of Service' (Dos or DDoS) attacks or 'booting'. These are attempts to make a computer, network or website unavailable by overwhelming it with internet traffic from multiple sources, and,
- Making, supplying or obtaining malware (malicious software) such as viruses, spyware, ransomware, botnets and Remote Access Trojans with the intent to commit further offence, including those above.

If there are concerns about a child in this area, the designated safeguarding lead (or a deputy), will consider referring into the Cyber Choices programme.

As recommended in KCSiE 2023, the College meets the Cyber security standards for schools and colleges.GOV.UK.

### **Bullying**

Bullying is behaviour by an individual or group, repeated over time, that intentionally hurts another individual or group either physically or emotionally. Bullying can take many forms (for instance, cyber-bullying via text messages, social media or gaming, which can include the use of images and video) and is often motivated by prejudice against particular groups, for example on grounds of race, religion, gender, sexual orientation, special educational needs or disabilities, or because a child is adopted, in care or has caring responsibilities. It might be motivated by actual differences between children, or perceived differences.

Cyber-bullying is a different form of bullying and can happen at all times of the day, with a potentially bigger audience, and more accessories as people forward on content at a click.

**The College adopts an antibullying approach, and procedures to follow if bullying occurs are detailed in the Relationships and Behaviour Policy.**

The College Induction programme and mandatory tutorials detail the need for respectful, safe behaviour and positive relationships.

The learner contract and staff code of conduct both state clearly the importance of respectful behaviour and reflect a whole College anti-bullying approach.

College staff have all taken part in trauma informed practice CPD and 'When Adults Change' CPD, both of which advocate the use of College being a calm, safe place to be.

All bullying, whatever the motivation or method, is unacceptable and will not be tolerated. If an incident of bullying outside the College premises or online is reported to College, it is important that it is investigated and appropriate action is taken. This will send a strong signal to learners that bullying will not be tolerated and perpetrators will be held to account. The College record incidents of bullying so that we can monitor incident numbers and identify where bullying is recurring between the same learners.

It is essential that all adults in the College know what to do when they suspect that a child is being bullied and which member of staff to contact. In the first instance a Curriculum Manager should be contacted. Where safeguarding concerns are raised, this should be reported to the Safeguarding team.

The Relationships and Behaviour Policy details the disciplinary sanctions which reflect the seriousness of an incident and convey a deterrent effect (strong sanctions such as being withdrawn from College may be necessary in cases of severe and persistent bullying).

[Preventing and tackling bullying \(publishing.service.gov.uk\)](https://publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/821222/Preventing_and_tackling_bullying.pdf)  
[Anti-bullyingalliance.org.uk/](https://anti-bullyingalliance.org.uk/)



### **Child-on-child abuse**

All staff should be aware that children can abuse other children (often referred to as child-on-child abuse), and that it can happen both inside and outside of College and online.

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

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

### **Child on child sexual violence and sexual harassment**

Where any reports are made of child-on-child sexual violence or sexual harassment they will be dealt with seriously and quickly. The normal disclosure protocols apply. Where such an allegation is made, the DSL will conduct a thorough separate risk assessments that considers:

- The victim, especially their needs, protection and support
- The alleged perpetrator, and their support needs protection and support
- All the other children (and, if appropriate, adult learners and staff) at the college, especially any actions taken that are appropriate to protect them.

This will be recorded and communicated to all staff that are required to know. Children displaying harmful sexual behaviour have often experienced their own abuse and trauma. It is important that they are offered appropriate support. Both victim and (alleged) perpetrator will receive appropriate support from the College and other services, on a case-by-case basis.

Please see Appendix D.

### **Child abduction and community safety incidents**

Child abduction is the unauthorised removal or retention of a minor from a parent or anyone with legal responsibility for the child. Child abduction can be committed by parents or other family members; by people known but not related to the victim (such as neighbours, friends and acquaintances); and by strangers.

Other community safety incidents in the vicinity of a school can raise concerns amongst children and parents, for example, people loitering nearby or unknown adults engaging children in conversation.

Any concerns regarding child abduction or people loitering near the College must be reported to the College Safeguarding team or a manager immediately so that action can be taken, including referral to police and other agencies where appropriate.

### **Contextual safeguarding & local circumstances**

Contextual safeguarding seeks to identify and respond to harm and abuse posed to young people outside their home, either from adults or other young people. As individuals move from childhood and into adolescence they spend increasing amounts of time socialising independently of their families. During this time the nature of young people's schools, neighbourhoods, and social media platforms and the relationships that they form in these settings, inform the extent to which they encounter protection or abuse. These extra-familial threats might arise at College, from within peer groups, or more widely from within the wider community and/or online.

### **Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE).**

Both CSE and CCE are forms of abuse that occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in sexual or criminal activity, in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. CSE and CCE can affect children, both male and female and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation.

### **Child Criminal Exploitation (CCE)**

Some specific forms of CCE can include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting, or pickpocketing. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others

Given the local context and the issues surrounding County Lines, the College recognises that so called 'initiation ceremonies' and 'hazing' (defined as: any activity expected of someone joining or participating in a group that humiliates, degrades, abuses, or endangers them regardless of a person's willingness to participate) could pose a significant risk to learners.

### **Child Sexual Exploitation (CSE)**

CSE is a form of child sexual abuse. Sexual abuse may involve physical contact, including assault by penetration (for example, rape or oral sex) or nonpenetrative acts such as masturbation, kissing, rubbing, and touching outside clothing. It may include noncontact

activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse including via the internet. CSE can affect any child who has been coerced into engaging in sexual activities. This includes 16- and 17-year-olds who can legally consent to have sex. Some children may not realise they are being exploited for example they believe they are in a genuine romantic relationship.

Please see Appendix H

### **Child on Child Abuse College Action**

The College will seek to minimise instances of child-on-child abuse (including sexual violence & sexual harassment), by ensuring that:

- Staff receive training to recognise the indicators of child-on-child abuse across its spectrum, including its gendered nature, and know how to refer cases and support learners
- The Safeguarding team works directly with staff and learners in a pro-active manner to inform awareness of child-on-child abuse and provide guidance and support on how to manage and address it, including the consistent challenge and management of so-called 'banter'.
- The Safeguarding Team will work closely with curriculum staff, learners and parent/carers to ensure that both victims and perpetrators have access to support and guidance mechanisms
- All cases of child-on-child abuse will be recorded and managed through the existing safeguarding and child protection procedure.
- Multi-agency practice principles for responding to child exploitation and extra-familial harm – non-statutory guidance for local areas, developed by the Tackling Child Exploitation (TCE) Support Programme, funded by the Department for Education and supported by the Home Office, the Department for Health and Social Care and the Ministry of Justice. (KCSiE 2023, Annex B).

### **Serious violence**

All staff should be aware of the indicators, which may signal children are at risk from, or are involved with, serious violent crime. These may include increased absence from College, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation. This is a safeguarding concern and should be reported to the Safeguarding team so that appropriate action and any referrals can be made.

### **Domestic Abuse**

The Domestic Abuse Act 2021 now creates a statutory definition of domestic abuse. In summary, the Act emphasises that domestic abuse is not just physical violence or

threatening behaviour, but can also be coercive or controlling, emotional, sexual and/or economic abuse. As part of this definition, children are explicitly recognised as victims if they see, hear or otherwise experience the effects of abuse.

They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn.

### ***Operation Encompass***

Operation Encompass is the notification from Cleveland Police to the College that a child (under 18) may have been affected by a domestic incident. Operation Encompass ensures that the safeguarding team are informed. The safeguarding team can then use the information, in confidence, to ensure the wellbeing of the learner. The College will look to make provisions or adjustments to assist the learner.

### **Homelessness**

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The designated safeguarding lead (and any deputies) keep contact details and referral routes into the Local Housing Authority so they can raise/progress concerns at the earliest opportunity.

[Homelessness-reduction-bill-policy-factsheets](#)

### **Female Genital Mutilation (FGM)**

Female Genital Mutilation 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.

Whilst all staff should speak to the designated safeguarding lead (or a deputy) with regard to any concerns about female genital mutilation (FGM), there is a specific legal duty on teachers.

If a teacher, in the course of their work in the profession, discovers that an act of FGM appears to have been carried out on a girl under the age of 18, the teacher must report this to the police.

There is a 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.

### **'Honour – based' abuse (including forced marriage)**

The College recognises that so-called 'honour-based' violence (HBV) encompasses incidents of crimes which have been committed to protect or defend the honour of the family and/or the community. Abuse committed in this context often involves a wider network of family or community pressure and can involve multiple perpetrators.

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 into a marriage.

If staff in our College have a concern regarding a student that might be at risk of HBV or who has suffered from HBV they will immediately speak to the Designated Safeguarding Lead who will follow the Colleges safeguarding procedures.

It is now illegal and a criminal offence to exploit vulnerable children by arranging for them to marry, under any circumstances whether or not force is used. The Marriage and Civil Partnership (Minimum Age) Act 2022, came into force in February 2023. It means that 16 and 17 year olds will no longer be allowed to marry or enter a civil partnership, even if they have parental consent. (KCSiE 2023, Annex B).

Please see Appendix C.

### **Mental Health**

All staff should be aware that mental health problems can in some cases be an indicator that a student has suffered or is at risk of suffering abuse, neglect or exploitation. Where learners have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence, and adulthood. Such experiences, can impact mental health, behaviour, and education. If staff have mental health concerns about a student that is also a safeguarding concern immediate action will be taken and the concern will be reported to a member of the Safeguarding team.

The College will take a proactive approach to supporting learners who declare a mental health need by offering guidance and signposting to appropriate agencies in line with safeguarding procedures and referral processes. The college has a commitment to developing resilience and positive mental wellbeing for all learners through the curriculum, tutorial and enrichment programmes.

### **Modern Slavery and the National Referral Mechanism**

Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs. Further information on the signs that someone may be a victim of modern slavery, the support available to victims and how to refer them to the NRM is available in Statutory Guidance

[Modern-slavery-how-to-identify-and-support-victims. GOV.UK](#)

### **Prevent Strategy**

All schools and colleges are subject to a duty under section 26 of the Counter-Terrorism and Security Act 2015 (the CTSA 2015), in the exercise of their functions, to have “due regard to the need to prevent people from being drawn into terrorism”. This is known as the Prevent duty.

Children and adults may be susceptible to extremist ideology and radicalisation. Similar to protecting children and adults from other forms of harms and abuse, protecting them from this risk is a part of the College's safeguarding duty.

- **Radicalisation:** refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups
- **Extremism:** is the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces in the UK or abroad.
- **Terrorism:** is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.
- **Channel:** A programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. The programme uses a multi-agency approach to protect vulnerable people by:
  - Identifying individuals at risk
  - Assessing the nature and extent of that risk
  - Developing the most appropriate support plan for the individuals concerned

If staff are concerned about a change in the behaviour of an individual or see something that concerns them (this could be a colleague too) they should seek advice appropriately with the Designated Safeguarding Lead and HR if a staff member is the source of concern.

To ensure that the College effectively safeguards learners and staff, manages risks and is able to deal appropriately with issues around radicalisation and extremism, the College will;

- Understand the nature of the threat from extremism and how this may impact directly or indirectly on the College
- Ensure that staff and learners understand the nature of the local threats
- Encourage staff and learners to respect and adhere to fundamental British values
- Ensure staff receive awareness training in recognising and preventing extremism and radicalisation
- Understand and manage potential risks within the College and from external influences including the display of extremist materials and the hiring of college premises
- Respond rapidly and appropriately to events in local, national or international news that may impact on the College community
- Ensure measures are in place to minimise the potential for acts of extremism within the College
- Ensure plans are in place to respond appropriately to a threat or incident within the College.
- Work with sub-contractors, employers and work placement providers to ensure they are compliant with the Prevent Duty and the College's safeguarding procedures

- Adopt effective ICT security and responsible user policies and promote these to all staff and learners
- Please see Appendix G for further information on the Prevent duty.

### **Serious Violence**

All staff should be aware of the indicators, which may signal children are at risk from, or are involved with, serious violent crime. These may include increased absence from College, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation. Staff should speak to the College safeguarding team regarding any concerns.

### **Student safety at College sites.**

#### **Wearing of Identity Badges**

In order to ensure that anyone accessing the College site is provided with a safe environment, it is a requirement that all staff, learners and visitors visibly wear ID badges with the College lanyards provided on all College sites unless directed otherwise. In addition to ensuring safety, this is a way to encourage a sense of belonging to College.

#### **Learners working with employers, external trainers or subcontractors**

The College is committed to ensuring that all learners in our subcontracted provision are safeguarded. Through due diligence, quality audits and unannounced visits we gather evidence to provide assurance and intervene if necessary.

Where college learners are working with employers or external trainers, for example on apprenticeships, traineeships, work experience placements, use of visiting speakers or during college visits, the College has a responsibility to ensure safeguarding policies and procedures are in place. In the case of apprenticeships, traineeships or work experience placements, this will involve the assessor, work placement officer or employability team conducting an assessment of the placement which will include a check on their safeguarding policy and procedures. Placement employers will be provided with information about college safeguarding teams including contact details. Virtual Work Experience placements should be sourced and offered through 'reputable' organisations, with learners made aware of how to report online safeguarding concerns.

Learners attending these placements will be provided with safeguarding information including how to report any concerns they have related to a placement.

- In the case of use of visiting speakers, an external speaker form needs to be completed by the organising member of staff, signed off by their manager and DSL, detailing checks completed on the visitor and oversight/supervision by a member of college staff. Where a visiting speaker or employer is introduced to the classroom 'virtually', this should be through Microsoft Teams, with a member of staff present in the room.

- In the case of college visits where an external trainer or speaker is involved, appropriate checks will be included in the visit risk assessment.

### **Use of Reasonable Force by staff on learners:**

KCSiE 2023 states that there are circumstances when it is appropriate for staff to use 'reasonable force' to safeguard learners. The term 'reasonable force' covers the broad range of actions used by staff, that involve a degree of physical contact to control or restrain.

This can range from guiding a student to safety by the arm, to more extreme circumstances such as breaking up a fight or where a young person needs to be restrained to prevent violence or injury. 'Reasonable' in these circumstances means 'using no more force than is needed'.

The use of force may involve either passive physical contact, such as standing between pupils or blocking a pupil's path, or active physical contact such as leading a pupil by the arm out of the classroom.

Staff should recognise the additional vulnerability of learners with SEN, disabilities or medical conditions when reasonable force is used in response to risks presented by incidents involving these learners.

The College has adopted the Department for Education's guidance on the use of reasonable force in schools which is made available to all members of staff within the College <https://www.gov.uk/government/publications/use-of-reasonable-force-in-schools>

### **Staff Training**

All staff receive adequate training to familiarise themselves with Safeguarding issues and responsibilities at induction, and at a minimum on an annual basis. All staff working with children must read and understand Part One and Annex, B of KCSiE 2023. Those staff **who do not work directly with children must** read Annex A

### **Safer Recruitment**

The College's approach to Safer Recruitment is included in the Recruitment & Selection Policy. The college will undertake online searches prior to shortlisting. Shortlisted candidates are informed of this. (KCSiE 2023, Para 221).

Please see Appendix N

### **Public Interest disclosure**

The Public Interest Disclosure Act Updated 2020, protects workers from detrimental treatment or victimisation from their employer if, in the public interest, they blow the whistle on wrongdoing. Staff should refer to Appendix P - Allegations and Whistleblowing and can also use the NSPCC whistle-blowing helpline number 0800 028 0285, if required.



### **Duty of Care**

Staff are accountable for the way in which they exercise authority, use resources, and actively take reasonable steps to protect children and adults from discrimination and foreseeable risks, including physical and emotional harm. Staff should develop respectful, caring and professional relationships between themselves and all other users of the College. Staff behaviour should demonstrate integrity, maturity, good judgement and management of risk in external visits/residential visits.

### **Breach of Trust**

'Position of trust' is a legal term that refers to certain roles and settings where an adult has regular and direct contact with children.

Under the Sexual Offences Act 2003, it is against the law for someone in a position of trust to engage in sexual activity with a child in their care, even if that child is over the age of consent (16 or over). This applies when the young person is in full time education and the person works in the same establishment as the young person, even if he/she does not teach the child.

### **Allegations made against/ concerns raised in relation to staff, governors, volunteers, contractors, sub-contractors, employers.**

There are two levels of allegation/concern that may arise against those working in or on behalf of College in a paid or unpaid capacity;

- Allegations that may meet the harms threshold

This relates to any allegation that might indicate a person would pose a risk of harm if they continue to work in their present position, or in any capacity with children/ learners in College.

- Allegations/concerns that do not meet the harms threshold – referred to as 'low level concerns'.

### **A 'low level concern' does not mean that it is insignificant, it just means that it does not meet the harms threshold.**

All concerns, regardless of whether they meet the harms threshold or not, should be reported into the Manager of Human Resources, who will then decide on the next steps. Concerns may arise as a result of face to face and/or online behaviour. 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 for Safeguarding must be informed of all allegations that raise concerns about child and/or vulnerable adult protection to ensure safeguarding measures are put in place.

Employers have a duty of care to their employees. If an allegation is raised against a person in a position of trust, it is important that an employer offers appropriate welfare support at such a time and recognises the sensitivity of the situation, KCSiE 2023.

### **Unsubstantiated, unfounded, false, or malicious reports**

If a safeguarding report is determined to be unsubstantiated, unfounded, false, or malicious, College will first consider if the learner making the allegation has done so as a cry for help, needs other help or may have been abused or harmed in some other way by someone else. If appropriate, a referral to social care will be made.

If a report is determined to be deliberately malicious or invented, the College may decide to follow its own Relationship & Behaviour Policy as a mechanism to respond to such a report.

### **Use of school or college premises for non-school/college activities**

Where College facilities/premises are rented to organisations or individuals (for example to community groups, sports associations, and service providers to run community or extra-curricular activities) Governors should ensure that appropriate arrangements are in place to keep children safe. This responsibility is delegated to Group Head of Estates.

When services or activities are provided by the governing body under the direct supervision or management of College staff, the College arrangements for child protection apply.

However, where services or activities are provided separately by another body this is not necessarily the case. The governing body should therefore seek assurance that the provider concerned has appropriate safeguarding and child protection policies and procedures in place (including inspecting these as needed); and ensure that there are arrangements in place for the provider to liaise with the College on these matters where appropriate. This applies regardless of whether or not the children who attend any of these services or activities are children who attend the College. The governing body should also ensure safeguarding requirements are included in any transfer of control agreement (i.e. lease or hire agreement), as a condition of use and occupation of the premises; and that failure to comply with this would lead to termination of the agreement.

The guidance on Keeping children safe in out-of-school settings details the safeguarding arrangements that schools and colleges should expect these providers to have in place. (KCSiE 2023, Para 167).

### **Organisations or Individuals using school premises.**

We are aware that as a College we may receive an allegation relating to an incident that happened when an individual or organisation was using College premises for the purposes of running activities for children (for example community groups, sports associations, or service providers that run extra-curricular activities). As with any safeguarding allegation, we would follow our safeguarding policies and procedures, including informing the LADO. (Para 377 KCSiE 2023)

[Keeping-children-safe-in-out-of-school-settings-code-of-practice](#)

### **Relevant Statutory Legislation and Guidance**

The College will ensure that all staff and learners are aware of and adhere to the relevant legislation and guidance both statutory and non-binding that attaches to all aspects of the Safeguarding agenda.

**Review** – This policy statement will be reviewed annually or sooner, in response to changes in legislation or College organisation. This will be initiated by the DSL.

### **Guidance and legal framework underpinning this safeguarding policy.**

‘Keeping Children Safe in Education’ 2023

Working Together to Safeguard Children’ 2023

Data Protection Act 2018 and the UK GDPR

Teacher standards.

The Care Act 2014

Counter-Terrorism and Security Act 2015

The Human Rights Act 1998

Equality Act 2010

The Children Act 1989 (and 2004 amendment).

The Education Act 2002

Adoption and Children Act 2002

Sexual Offences Act 2003

Female Genital Mutilation Act 2003. (Amended by Serious Crime Act 2015 to include mandatory reporting)

The Children Act 2004

The guidance on Keeping children safe in out-of-school settings details the safeguarding arrangements that schools and colleges should expect these providers to have in place

[Domestic-abuse-act statutory-guidance](#)

[nspcc.org.uk/harmful-sexual-behaviour-framework/](https://nspcc.org.uk/harmful-sexual-behaviour-framework/)

[Promoting-the-education-of-looked-after-children](#)

[Virtual-school-head-role-extension-to-children-with-a-social-worker](#)

[Meeting-digital-and-technology-standards-in-schools-and-colleges/filtering-and-monitoring-standards-for-schools-and-colleges](#)

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/614441/Prevent-duty-departmental-advice Gov.UK](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/614441/Prevent-duty-departmental-advice-Gov.UK)

[Sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people](#)

[Searching-screening-and-confiscation](#)

[Use-of-reasonable-force-in-schools](#)

[Keeping-children-safe-in-out-of-school-settings-activities-after-school-clubs-and-tuition-non-statutory-guidance-for-providers-running-out-of-school-settings](#)

[Full-time-enrolment-of-14-to-16-year-olds-in-further-education-and-sixth-form-colleges](#)

[Promoting-children-and-young-peoples-emotional-health-and-wellbeing](#)

[Mental-health-and-wellbeing-support-in-schools-and-colleges](#)

[Designated-teacher-for-looked-after-children](#)

[Government/publications/dbs-filtering-guidance](#)

<http://www.thinkuknow.co.uk/>