

### Child and Vulnerable Adult Protection

#### 1. Definitions

The key terms in this document are defined as:

- **Children:** Those under the age of eighteen and for the purposes of safeguarding 19-25 year olds with an EHCP.
- **Vulnerable Adult:** 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.

**All staff** should be aware of indicators of abuse and neglect (see below), understanding that children can be at risk of harm inside and outside of the College, inside and outside of home, and online.

Exercising professional curiosity and knowing what to look for is vital for the early identification of abuse and neglect so that staff are able to identify cases of children who may be in need of help or protection.

**All staff** should be aware that abuse, neglect and safeguarding issues are rarely standalone events and cannot be covered by one definition or one label alone. In most cases, multiple issues will overlap with one another.

#### 2. Indicators of abuse and neglect

**Abuse:** a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children.

**Physical abuse:** a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

**Emotional abuse:** the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child 11 opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning or preventing the child from participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

**Sexual abuse:** involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education and all staff should be aware of it and of their school or college's policy and procedures for dealing with it.

**Neglect:** the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy, for example, as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate caregivers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

## **Safeguarding issues**

**All staff** should have an awareness of safeguarding issues that can put children at risk of harm. Behaviours linked to issues such as drug taking and/or alcohol misuse, deliberately missing education, serious violence (including that linked to county lines), radicalisation and consensual

and non-consensual sharing of nude and semi-nudes images and/or videos can be signs that children are at risk.

**Below are some safeguarding issues all staff should be aware of.**

### **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.

It is essential that **all staff** understand the importance of challenging inappropriate behaviours between children, many of which are listed below, that are abusive in nature.

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 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.

They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others.

As children involved in criminal exploitation often commit crimes themselves, their vulnerability as victims is not always recognised by adults and professionals, (particularly older children), and they are not treated as victims despite the harm they have experienced. They may still have been criminally exploited even if the activity appears to be something they have agreed or consented to.

It is important to note that the experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however professionals should be aware that girls are at risk of criminal exploitation too. It is also important to note that both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

### **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 occur over time or be a one-off occurrence and may happen without the child's immediate knowledge for example through others sharing videos or images of them on social media.

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. Domestic Abuse.

## **Domestic abuse**

Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional. Children can be victims of domestic 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.

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

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.

## **Mental Health.**

All staff should be aware that 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. Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Education staff, however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one. Schools and colleges can access a range of advice to help them identify children in need of extra mental health support, this includes working with external agencies. If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following their child protection policy, and speaking to the designated safeguarding lead or a deputy.

## **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 school or 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.

**Keeping Children Safe in Education 2023 Annex B** contains important additional information about specific forms abuse and safeguarding issues.

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

[Keeping children safe in education 2023 \(publishing.service.gov.uk\)](https://publishing.service.gov.uk)

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

Designated Safeguarding Lead (DSL) and SSW Manager for Safeguarding & Welfare and all Advanced Safeguarding Practitioners are detailed below.

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

Designated Lead for Safeguarding (DSL)	<p><b>Sue Everton</b> Group Head of Student Support &amp; Wellbeing</p> <ul style="list-style-type: none"> <li>Email – sue.everton@the-etc.ac.uk</li> <li>Tel: 01642 865400 M: 07860860986</li> </ul>
Student Support and Wellbeing Manager - Safeguarding and Welfare – Deputy DSL (DDSL)	<p><b>Daniel Mahmoodshahi</b> Student Support and Wellbeing Manager - Safeguarding and Welfare</p> <ul style="list-style-type: none"> <li>Email – daniel.mahmoodshahi@stockton.ac.uk</li> <li>Telephone - M: 07395795711</li> </ul>
<p>Deputy DSL – line managed by Student Support and Wellbeing Manager – Safeguarding and Welfare</p> <p>Primary working site is identified next to everyone; however, each member of the team can support group wide.</p>	<p><b>Alice Reid</b> Advanced Safeguarding Practitioner (SRC)</p> <ul style="list-style-type: none"> <li>Email – alice.reid@stockton.ac.uk</li> <li>T: 01642 865530 M: 07970 982324</li> </ul> <p><b>Leanne Keane-Barker</b> Advanced Safeguarding and Welfare Practitioner (SRC/NETA) Email: Leanne.keane-barker@stockton.ac.uk</p> <ul style="list-style-type: none"> <li>M: 07702521009</li> </ul> <p><b>Katie Todd</b> Advanced Safeguarding Practitioner (SRC/NETA)</p> <ul style="list-style-type: none"> <li>Email – katie.todd@stockton.ac.uk</li> <li>Telephone – 07590 864913</li> <li></li> </ul> <p><b>Tracy Williams</b></p>

	<p>Advanced Safeguarding Practitioner (RCC)</p> <ul style="list-style-type: none"> <li>• Email – tracy.williams@cleveland.ac.uk</li> <li>• Telephone – 01642 777230 / 07702 515472</li> </ul> <p><b>Rachel O’Riordan</b> Advanced Safeguarding Practitioner (Bede)</p> <ul style="list-style-type: none"> <li>• Email – rachel.oriordan@stockton.ac.uk</li> <li>• Telephone – 07590 864913</li> </ul> <p><b>Christine Cook</b> Advanced Safeguarding and Welfare Practitioner (TSA)</p> <ul style="list-style-type: none"> <li>• Email – christine.cook2@stockton.ac.uk</li> <li>• Telephone – 07968107338</li> </ul>
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### **If a learner makes a disclosure to a staff member:**

- 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 say that the learner will be kept informed of any actions
- 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, as far as possible using the learner’s words, with time, date and place.
  - Contact an Advanced Safeguarding Practitioner immediately. If you do not think it is advisable to leave the learner on their own ask another member of staff to contact them for you
- Once the Safeguarding Team are informed, do not discuss the issue any further with the student or any other staff member.
- If an the Safeguarding Manager, Advanced Safeguarding Practitioner or DSL is not immediately available refer the concern to an appropriate manager by contacting:

- Stockton Riverside College (SRC) Reception during normal College hours and holiday periods by dialling 0 from any phone on the SRC site
  - Bede Sixth Form College Reception on 2001 from any phone on the Bede site
  - Redcar & Cleveland College (RCC) Reception during normal college hours and holiday periods by dialling 0 from any landline phone on the RCC site
  - Skills Academy staff should contact SRC Reception on 01642 865400 during normal College hours and holiday periods
  - NETA reception on 01642 616936
  - The SRC site Duty Manager can be contacted Tuesday – Wednesday on 07970844351 (Evenings 5.00-21.00 in term time)
  - The RCC site Duty Manager can be contacted Monday – Thursday on 07703733330 (Evenings after 5.00-21.00 in term time)
- Write down what you were told or saw as soon as possible afterwards. Record the date and the precise time of day s/he told you and the date and time.
  - Give any notes to the ASP or manager. Do not keep copies.
  - If you become aware of a Safeguarding concern outside of College opening hours, take all reasonable steps yourself to protect a young person or vulnerable adult from an immediate threat (e.g. contact Social Services/the Emergency Duty Team or the Police for advice) on the numbers below:

Children's Services	Office	Out of Hours	Email
Hartlepool	01429 284284 01642 130080	01642 524552	<a href="mailto:childrenshub@hartlepool.gov.uk">childrenshub@hartlepool.gov.uk</a>
Middlesbrough	01642 726004	01642 524552	<a href="mailto:MiddlesbroughMACH@middlesbrough.gov.uk">MiddlesbroughMACH@middlesbrough.gov.uk</a>
Redcar & Cleveland	01642 130700	01642 524552	<a href="mailto:RedcarMACH@redcar-cleveland.gov.uk">RedcarMACH@redcar-cleveland.gov.uk</a>
Stockton-on-Tees	01642 130080 01429284284	01642 524552	<a href="mailto:childrenshub@hartlepool.gov.uk">childrenshub@hartlepool.gov.uk</a>

- Where a child is suffering, or is likely to suffer from harm, it is important that a referral to local authority children's social care (and if appropriate the police) is made immediately. Referrals should follow the local referral process.
- You must follow a verbal referral to social services or the Police with a written referral form and then ring again to ensure the referral form has been received.
- Download the referral form from:
- [Home - Tees Safeguarding Children Partnerships' Procedures \(teescpp.org.uk\)](http://teescpp.org.uk)
- If an allegation is about contact parents/ carers, NO NOT inform them of the referral or any other person (e.g. friends of the learner). This is very important to prevent



potential further abuse or making immediate arrangements for a young person or adult to leave the country (e.g., for a forced marriage or to join an extremist organisation).

- Note. It can be very distressing to hear, what can be, very graphic details about abuse. Everyone is different and individual members of staff will be affected in different ways. Make sure you access support, when and as often as you need it, from HR. You must not share confidential information with those who do not have a need, or right, to know sensitive information.
- **Staff should not assume a colleague, or another professional will take action** and share information that might be critical in keeping children safe.

### 3. Designated Person

On notification of a safeguarding concern the ASP, Safeguarding Manager or DSL will:

- Manage any support for the learner internally via the College's own support processes
- Make an early help assessment, or
- Make a referral to statutory services, for example as the child might be in need, is in need or suffering, or is likely to suffer harm.

Act within the guidance provided within [Information Sharing – Advice for practitioners providing safeguarding services to children, young people, parents and carers July 2018](#)

If the Advanced Safeguarding Practitioner, Safeguarding Manager or Designated Safeguarding Lead decides a referral is required to the Adult or Children's Social Care Service, and/ or to the Channel they will:

- Ask for the views of the child/ adult concerned. However, whilst their view should be respected and considered, it remains the responsibility of the Designated Person to take whatever action is required to ensure the safety of the child/ adult involved and others who may be at risk. The protection of the child or adult must always be the most important consideration.
- Where appropriate, discuss concerns with the family/carers and seek agreement for a referral *unless* this may place the child or adult at risk of harm or compromise the safety of another person.
- Collate the details required for a referral as comprehensively as possible (including full address, date of birth, whether there are other children, young people or vulnerable adults in the setting, any special needs and other professionals involved) and document whether consent for referral was obtained from the person and their family/carers, or if not the reason for this decision.
- Refer to Social Care Services and/or Channel (see Appendix G - Prevent) in a timely way (reflecting the level of perceived risk but always within the working day) recording the name of the person referred to and the time of the call.
- Refer to the Social Care Services emergency duty team if out of hours.

- Confirm the referral to Social Care Services in writing as soon as possible by downloading and completing the current Safer Referral form from [Home - Tees Safeguarding Children Partnerships' Procedures \(teescpp.org.uk\)](https://www.teescpp.org.uk)
- Keep a written record of all discussions with the child/ adult and their parents/carers, discussions with others with the College, information provided to Social Care, their advice and any decisions taken (timed, dated and signed)
- Store the records in the appropriate secure location
- Inform the Designated Lead for Safeguarding
- Clarify with social services or the Police whether the referral has been accepted for action
- If the referral is accepted for action, comply with requests from Social Care Services and/ or Police for further involvement (e.g. strategy and case conference meetings or other contributions to child protection plans)
- If the referral is not accepted, clarify the reasons why not, and if you still consider that the person (or others) are at risk consult as appropriate (e.g. with College Designated Lead for Safeguarding) regarding the next steps
- If you consider that the matter can be dealt with by College services or those of another agency (excluding the Social Care services) follow the steps outlined below.

**If a referral to the Social Care Service is not required or not accepted for action:**

- If referral to external services is not accepted, ask Social Care to check the Early Help Assessment (EHA) database to see whether there is a current EHA open. If not refer to the service if appropriate.
- Consent for referral to external agencies *must be obtained* from the child/vulnerable adult and/or their parent or carer for an EHA.

### Children and Adults Absent from Education

#### 1. Purpose and content

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

#### Definitions

**Children:** Those under the age of eighteen and for the purposes of safeguarding 19-25 year olds with an EHCP.

**Vulnerable Adult:** 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.

#### Children who are absent from education

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

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

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

The College is committed to the protection of the most vulnerable and all staff must ensure action is taken when a learner's attendance record is poor and urgent action must be taken if a learner under the age of 18 or a learner aged 25 or under who is in receipt of an EHCP stops

attending College during their course without a legitimate reason. Action must also be taken if a vulnerable adult goes missing and the circumstances give cause for concern.

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

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

## **2. Legitimate reasons for non-attendance**

For the purpose of this guidance legitimate reasons include:

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

## **3. Actions to be taken in response to non-legitimate absences**

- All curriculum staff must monitor attendance and address it at the earliest opportunity with the learner, and their parent/carer or any professionals/schools involved, if it starts to decline
- Ongoing concerns about a learner's attendance must be referred by curriculum staff to the following managers:

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

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

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

#### 1. Purpose and content

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

#### 2. Definitions

The key terms in this document are defined as:

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

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

### 3. Relevant external guidance

#### 4. Female Genital Mutilation

Department for Education (DfE) September 2023: Keeping children safe in education; statutory guidance for schools and colleges outlines the **statutory duty on teachers, introduced in October 2015, under Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) to report to the police** where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. The guidance also outlines that those teachers failing to report such cases will face disciplinary sanctions.

[FGM Fact Sheet](#)

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

#### Forced Marriage.

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

College staff can contact the Forced Marriage Unit if they need advice or information: Contact: 020 7008 0151 or email [fmu@fcdo.gov.uk](mailto:fmu@fcdo.gov.uk).

### 5. Actions to be taken in response to FGM

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

- All staff must maintain an attitude of 'it could happen here' and be vigilant. Staff must respond immediately if there is any indication that HBA is taking place or FGM has been performed on any female, or if it appears that there is a risk of FGM being planned. This includes learners, staff, volunteers, learners on placements and any other female in the College or wider community.
- There are **no circumstances** in which any College staff member should examine a girl.
- Curriculum delivery staff (e.g. teachers and lecturers) must report the information they have become aware of directly to the Police if the female is under 18.
- It is recommended that you make a report orally by calling 101, the single non-emergency number. You will be given a reference number for the call and should ensure that you document this in your records.
- Ensure that you keep a comprehensive record of any discussions held and subsequent decisions made, and share this with the DSL or one of her deputies.
- This duty does not exist in at risk or suspected cases. College staff should report the concern to the DSL or one of her deputies following usual safeguarding procedure.
- The teacher/lecturer should then report the case to the College Designated Safeguarding Lead (DSL) Sue Everton, or one of the Deputy Designated Persons in her absence, following the referral routes as outlined in Making a referral Appendix J, of the Safeguarding Policy. The Safeguarding staff member will then make a referral to

Children's Social Care. In these cases, parents/ carers will not be informed before seeking advice.

- Teachers/lecturers must report information of FGM on a female aged 18+ to the College Designated Safeguarding Lead or one of the Deputy Designated Persons in her absence, following the referral routes as outlined in Making a referral Appendix J, of the Safeguarding Policy.
- All other staff should report information of FGM to the College Designated Safeguarding Lead (DSL) or one of the Deputy Designated Persons in her absence following the referral routes as outlined in Making a referral Appendix J of the Safeguarding Policy.

### **Actions to be taken in response to HBA**

**Forced marriage** – Colleges can play an important role in safeguarding children from forced marriage. Teachers/lecturers should report information to the College Designated Safeguarding Lead or one of the Deputy Designated Persons in her absence, following the referral routes as outlined in Making a referral Appendix J of the Safeguarding Policy. -

#### **Potential Indicators**

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



### **Child-on-child Abuse (including bullying, cyber-bullying, sexting (sharing nudes & semi-nudes), upskirting, sexual violence, and sexual harassment)**

#### **1. Purpose and content**

The purpose of this appendix of the College Safeguarding Policy is to provide a clear set of guidelines to staff regarding the actions they must take if they become aware that a learner is at risk of child-on-child abuse. 'Children' includes everyone under the age of 18.

All staff are advised to maintain an attitude of 'it could happen here'. All College staff should be aware of and respond appropriately to all reports and concerns about sexual violence and/or sexual harassment both online and offline, including those that have happened outside of the school/college.

It is essential that all staff understand the importance of challenging inappropriate behaviours between children, many of which are listed below, that are abusive in nature. Downplaying certain behaviours, for example dismissing sexual harassment as "just banter", "just having a laugh", "part of growing up" or "boys being boys" can lead to a culture of unacceptable behaviours, an unsafe environment.

Child-on-child abuse is most likely to include, but may not be limited to, bullying, including cyber bullying, prejudice-based bullying and discriminatory bullying, abuse in intimate personal relationships between peers, (teenage relationship abuse), physical abuse, sexual violence and sexual harassment (detailed in part 5 of KCSiE 2023), causing someone to engage in sexual activity without consent, consensual and non-consensual sharing of nudes and semi-nudes' images and/or videos, upskirting (which is a criminal offence), initiation / hazing rituals.

The College adopts a zero-tolerance approach to any form of sexual violence & sexual harassment alongside all forms of child-on-child abuse. We do, however, promote dialogue of all issues relating to safeguarding and in particular, sexual harassment and sexual violence, in order to provide a safe environment where children feel able to disclose concerns.

We accept and recognise that sexual violence and sexual harassment may be happening within our college. We are committed to ensuring the college is a safe place and awareness of these issues are raised overtly with learners and staff to ensure understanding and processes for alerting staff. All allegations of harm are taken seriously.

Child on child abuse should be addressed as a child protection concern when there is reasonable cause to suspect that a child or is suffering, or is likely to suffer, significant harm. Child on child abuse involving those under the age of 18 must always be referred to the Designated Safeguarding Lead or one of her deputies.. Staff should be aware that some groups are potentially more at risk. Evidence shows girls and children and young people with SEND and/ or who are LGBT+ children are at greater risk.

## 2. Definitions

The key terms in this document are defined as:

- **Child:** Those under the age of eighteen
- **Education and Health Care Plan (EHCP):** An education, health and care ( EHC ) plan is for children and young people aged up to 25 who need more support than is available through special educational needs support. EHC plans identify educational, health and social needs and set out the additional support to meet those needs.
- **Bullying:** Behaviour by an individual or group, repeated over time, that intentionally hurts another individual or group either physically or emotionally. This includes any repeated words or actions, which are aimed at causing someone to feel frightened, miserable and helpless. Bullying can take many forms, including:
  - Verbal: e.g. name calling, sarcasm, threatening & teasing
  - Physical: e.g. pushing, hitting, kicking, punching or any use of physical aggressive contact
  - Social: e.g. ignoring, spreading rumours or treating someone like an outsider
  - Psychological: e.g. stalking & intimidationBullying, including cyber-bullying) can be involved in any type of abuse and is often motivated by prejudice or ignorance due to actual or perceived differences between people or groups or people. People who are lesbian, gay, bisexual or transgender (LGBT), those from minority ethnic groups, or those with disabilities and/or learning difficulties can be more vulnerable to this form of abuse and the College takes it duty to protect more vulnerable learners very seriously.
- **Cyber-bullying:** ‘Virtual’ bullying using technology (e.g. chat rooms, instant messaging, email & mobile phone) which can occur in or outside College. Cyber-bullying can happen at all times of the day, with a potentially bigger audience, as people can forward on content very quickly and easily. See Appendix E, online safety. [Cyberbullying-guidance-for-schools](#)
- **Bullying:** (
- **Harmful Sexual Behaviour:** Refers to sexual behaviours expressed by children and young people that are developmentally inappropriate, may be harmful towards self or others or abusive towards another child, young person or adult. Staff should be aware that harmful sexual behaviour maybe an indicator that the child has been abused. An age or developmental difference should be an indicator of particular

concern where behaviour is potentially harmful. Any child or young person who exhibits harmful sexual behaviour may need a safeguarding response and must always be referred to the DSL.

- [Preventing Harmful Sexual Behaviour](#)
- [Contextual Safeguarding Network - addressing-harmful-sexual-behaviour-in-schools](#)
- **Sexting (sharing nudes or semi-nudes): Consensual and non-consensual sharing of nude and semi-nude images and/or videos<sup>11</sup> (also known as sexting or youth produced sexual imagery)**
- Creating, possessing and sharing sexual photos and videos of under-18s, including selfies, is illegal. See Appendix E, online safety. [Sharing nudes and semi-nudes advice for education settings](#)
- **Harassment:** Any conduct which is unwanted by a learner, which affects the dignity of the learner or group of learners in the College. Harassment may be repetitive or an isolated occurrence against one or more learners
- **Up skirting:** Up skirting typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification or cause the victim humiliation, distress or alarm. Since April 2019 Up skirting has been a criminal offence.
- **Initiation and / hazing type violence and rituals:**  
This could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element.
- **Sexual Harassment:** Sexual harassment means 'unwanted conduct of a sexual nature' that can occur online and offline, inside and outside of college. When we reference sexual harassment, we do so in the context of child-on-child sexual harassment. Sexual harassment is likely to: violate a child's dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment. Whilst not intended to be an exhaustive list, sexual harassment can include;
  - Sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names;
  - Sexual "jokes" or taunting;
  - Physical behaviour, such as: deliberately brushing against someone, interfering with someone's clothes (schools and colleges should be considering when any of this crosses a line into sexual violence - it is important to talk to and consider the experience of the victim).
  - Displaying pictures, photos or drawings of a sexual nature,
  - Upskirting (as above)
  - Online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence. It may include:

- Consensual and non-consensual sharing of nudes and semi-nude images and videos. (UKCCIS sexting advice provides detailed advice for schools and colleges);
  - Sharing of unwanted explicit consent
  - 
  - Sexualised online bullying
  - Unwanted sexual comments and messages, including, on social media
  - Sexual exploitation; coercion and threats
  - Coercing others into sharing images of themselves or performing acts they're not comfortable with online.
- **Sexual Violence:** Children can, and sometimes do, abuse other children in this way and it can happen both inside and outside of College
- Under the Sexual Offences Act 2003 sexual violence is describes as;
  - **Rape:** A person (A) commits an offence of rape if: he intentionally penetrates the vagina, anus or mouth of another person (B) with his penis, B does not consent to the penetration and A does not reasonably believe that B consents.
  - **Assault by Penetration:** A person (A) commits an offence if: s/he intentionally penetrates the vagina or anus of another person (B) with a part of her/his body or anything else, the penetration is sexual, B does not consent to the penetration and A does not reasonably believe that B consents.
  - **Sexual Assault:** A person (A) commits an offence of sexual assault if: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents. This includes outside of clothing.
  - **Causing someone to engage in sexual activity without consent**  
A person (A) commits an offence if: she / he intentionally causes another person (B) to engage in a n activity, the activity is sexual, (B) does not consent to engaging in the activity, and (A) does not reasonably believe that (B) consents. (This could include forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.)

### What is consent?

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

penetration only if s/he agrees by choice to that penetration and has the freedom and capacity to make that choice.

- A child under the age of 13 can never consent to any sexual activity
- The age of consent is 16
- Sexual intercourse without consent is rape.

### **3. External guidance**

**Keeping Children Safe in Education 2023, Part Five.**

[Working-together-to-safeguard-children](#)

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

The Equality Act 2010 requires the College to:

- Eliminate unlawful discrimination, harassment, victimisation and any other conduct prohibited by the act

### **4. Actions**

The following actions must be taken by all staff:

All staff must be aware that children and young people are capable of abusing their peers.

- All staff and learners have a responsibility to work together to ensure that abuse does not occur, or where it is found, action is taken
- Staff must ensure ground rules are set in induction and that learners are made aware of what constitutes abuse (including bullying and cyber-bullying) and how any incidents of abuse will be addressed through safeguarding procedures, (including reporting to police and Children's Social Care when appropriate) and/ or the Relationships and Behaviour Policy.
- Course leaders/personal tutors for under 18s, and those under the age of 25 in receipt of an EHCP and/or high needs funding, must ensure learners understand how to stay safe from abuse and how to report abuse, through the mandatory induction and tutorial programme.
- Staff receiving reports of abuse, including incidents that take place off College premises, must take appropriate action to report the abuse to the DSL or one of her deputies. Any allegations/incidents would be dealt with using the Relationships and Behaviour Policy Sanctions against alleged perpetrators may include suspension whilst an investigation takes place. Please see Relationships and Behaviour Policy.
- Staff must ensure appropriate managers are notified. This includes the 14-16 Manager or 14-16 Coordinator (RCC) for a learner who is under the age of 16 (e.g. Y10/11) at the start of the academic year and the High Needs Manager/SEND Co (RCC) for a learner up to the age of 25 who is in receipt of an EHCP and/or high needs funding
- All staff involved must carefully consider the potential impact of the abuse on both the alleged perpetrator/s and the alleged victim/s and refer those involved for

additional support from the Safeguarding team as appropriate. All concerns must be referred to the DSL or one of her deputies following the Making a referral Appendix J of the safeguarding policy.

- The DSL or deputy will take any actions deemed appropriate to ensure safeguarding needs are met. This may include referral to the Multi-Agency Children's Hub which includes Children's Social Care and police.
- All allegations/incidents must be recorded, and learners involved told what will happen next.
- Any incident of abuse must be discussed with the learners' parents/carers for under 18s and those under the age of 25 in receipt of an EHCP and/or high needs funding. It must be shared with the school DSL where appropriate (for Y10/Y11s) by the 14-16 Manager/14-16 Coordinator (RCC). (Please see below for exceptions to this rule). An agreement must be reached as to what action should be taken subject to compliance with safeguarding procedures and the Relationships and Behaviour Management Policy.

## **5. What to consider**

The designated safeguarding lead (or a deputy) is likely to have a complete safeguarding picture and be the most appropriate person to advise on the initial response by the school or college. Important considerations will include:

- the wishes of the victim in terms of how they want to proceed. This is especially important in the context of sexual violence and sexual harassment. Victims should be given as much control as is reasonably possible over decisions regarding how any investigation will be progressed and any support that they will be offered. This will however need to be balanced with the school's or college's duty and responsibilities to protect other children
- the nature of the alleged incident(s), including whether a crime may have been committed and/or whether HSB has been displayed
- the ages of the children involved
- the developmental stages of the children involved
- any power imbalance between the children. For example, is/are the alleged perpetrator(s) significantly older, more mature, confident and well-known social standing? Does the victim have a disability or learning difficulty?
- if the alleged incident is a one-off or a sustained pattern of abuse (sexual abuse can be accompanied by other forms of abuse and a sustained pattern may not just be of a sexual nature)
- that sexual violence and sexual harassment can take place within intimate 116 personal relationships between children
- importance of understanding intra familial harms and any necessary support for siblings following incidents

- are there ongoing risks to the victim, other children, adult students or school or college staff, and
- other related issues and wider context, including any links to child sexual exploitation and child criminal exploitation.

## 6. Useful contacts

- NSPCC Helpline 0808 800 5000
- NSPCC [Harmful Sexual Behaviour](#)
- ChildLine 0800 500 / [www.childline.org.uk](http://www.childline.org.uk)
- Kidscape [www.kidscape.org.uk](http://www.kidscape.org.uk)
- Anti-Bullying Alliance [www.antibullyingalliance.org](http://www.antibullyingalliance.org)
- Bullying UK [www.bullyinguk.org.uk](http://www.bullyinguk.org.uk)
- [Brook Sexual Behaviours Traffic Light Tool](#)
- <https://undressed.lgfl.net/> - LGFL 'Undressed' provided schools advice about how to teach young children about being tricked into getting undressed online in a fun way without scaring them or explaining the motives of sex offenders.
- Farrer & Co: Addressing child on child abuse: a resource for schools and colleges. This resource provides practical guidance for schools and colleges on how to prevent, identify early and respond appropriately to [child on child abuse](#)

### Online Safety

#### 1. Purpose and content

The purpose of this appendix of the College Safeguarding Policy is to provide a clear set of guidelines to staff regarding the actions they must take if they become aware that a learner is at risk of harm because of using the internet.

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

Whilst we aim to support the full use of the vast educational potential of communication technologies, we also have a responsibility to provide safeguards against risk, unacceptable material, and activities. These guidelines are designed to protect learners from online safety incidents and promote a safe e-learning environment.

The College believes that all students should be trusted and enabled to use digital technologies in a principled and productive way. All students should be given the opportunity to make productive decisions in the ways they decide to use digital technologies safely.

Any online abuse must be treated as a child protection/ learner protection and referred to the DSL or one of her deputies.

#### 2. Definitions

The key terms in this document are defined as:

- **Childre:** Those under the age of eighteen and for the purposes of safeguarding 19-25 year olds with an EHCP.
- **Vulnerable Adult:** 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.
- **Education and Health Care Plan (EHCP):** An education, health and care ( EHC ) plan is for children and young people aged up to 25 who need more support than is available through special educational needs support. EHC plans identify educational, health and social needs and set out the additional support to meet those needs**Cyber-bullying:** 'Virtual' bullying using technology (e.g. chat rooms, instant messaging, email & mobile phone) which can occur in or outside College. Cyber-bullying can



happen at all times of the day or night, with a potentially bigger audience, as people can forward on content very quickly and easily

- [Cyberbullying-guidance-for-schools](#)
- **Sending nude or semi-nude images:** Consensual and non-consensual sharing of nude and semi-nude images and/or videos (previously known as sexting) or youth produced sexual imagery.
- Creating, possessing and sharing sexual photos and videos of under-18s, including selfies, is illegal under the Sexual Offences Act 2003.
- **Online Harassment:** Any online conduct which is unwanted by a learner, which affects the dignity of the learner or group of learners in the College. Harassment may be repetitive or an isolated occurrence against one or more learners and may take place online.
- **Sexual Harassment:** Sexual harassment means 'unwanted conduct of a sexual nature' that can occur online and offline. When we reference sexual harassment, we do so in the context of child on child sexual harassment. Sexual harassment is likely to: violate a child's dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment. Whilst not intended to be an exhaustive list, sexual harassment can include;
  - Sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names;
  - Sexual "jokes" or taunting;
  - Online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence. It may include:
    - Consensual and non-consensual sharing of nudes and semi-nude images and videos.
    - Sharing of unwanted explicit content
    - Sexualised online bullying;
    - Unwanted sexual comments and messages, including, on social media; and
    - Sexual exploitation; coercion and threats
    - Coercing others into sharing images of themselves or performing acts they're not comfortable with online.

### 3. Online risks

Blended models of study increases the risks associated with online abuse. Advice for young people can be found here, [Childline](#), the [UK Safer Internet Centre](#) and [CEOP](#). Concerns must be passed to the Safeguarding and Welfare Team immediately.

This advice deals with the protection of all students and staff at the College when using ICT resources and articulates what is deemed to be acceptable and unacceptable use of those resources. Whilst we aim to support the full use of the vast educational potential of

communication technologies, we also have a responsibility to provide safeguards against risk, unacceptable material, and activities. These guidelines are designed to protect all users from online safety incidents and promote a safe e-learning environment for students.

The Breadth of Issues classified within online safety is considerable, but can be categorised into four areas of risk:

- **Content:** being exposed to illegal, inappropriate or harmful material; 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, pressure from other students, commercial advertising as well as adults posing as children and young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes
- **Conduct:** personal online behaviour that increases the likelihood of, or causes harm; for example, making, sending and receiving explicit images e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying; and
- **Commerce:** risks such as online gambling, inappropriate advertising, phishing and or financial scams. If you feel learners or staff are at risk, please report it to the Anti-Phising 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.

**Remote education** Guidance to support schools and colleges understand how to help keep pupils, students and staff safe whilst learning remotely can be found at Safeguarding and remote education - GOV.UK ([www.gov.uk](http://www.gov.uk)) and Providing remote education: guidance for schools - GOV.UK ([www.gov.uk](http://www.gov.uk)). The NSPCC also provide helpful advice - Undertaking remote teaching safely.

Virtual Work Experience placements should be sourced and offered through 'reputable' organisations, with students made aware of how to report online safeguarding concerns.

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. Other applications such as Zoom are not permitted.

#### **4. Education — Students**

Whilst regulation and technical solutions are very important, their use must be balanced by educating students to take a responsible approach. The education of students in online safety is therefore an essential part of the College's online safety provision. Students need the help and support of the College to recognise and avoid online safety risks and to build their resilience.

Online safety education will be provided in the following ways:

Induction and tutorials which enable learners to understand the potential dangers online and includes information about appropriate online behaviours.

- Students should be taught to be critically aware of the materials / content they access on-line and be guided to validate the accuracy of information on all relevant teaching programmes.
- Students should be helped to understand and adopt safe and appropriate use of IT, the internet, and mobile devices both within and outside College.
- Students should be taught to acknowledge the source of information used and to respect copyright when using material accessed on the internet.
- Through staff acting as good role models in their use of ICT, the internet, and mobile devices.
- Online safety should be a focus in all areas of the curriculum and staff should reinforce online safety messages in the use of ICT across the curriculum.
- Where students can freely search the internet, e.g. using search engines, staff should be vigilant in monitoring the content of the websites the people visit.
- It is accepted that from time to time, for good educational reasons, students may need to research topics (e.g. racism, drugs, and discrimination) that would normally result in internet searches being blocked. In such a situation, staff can request that IT Services Staff can temporarily remove those sites from the filtered list for the period of study. Any request to do so, should be auditable, with clear reasons for the need.
- The safe use of IT must be reinforced and supported in terms of ensuring appropriate and adequate measures are in place to mitigate the risk posed by extremist material and on-line radicalisation in line with Prevent Duty guidance.

*Whilst it is recognised that mobile communications technology (i-pads, tablets, I-phones, Androids etc.) can be of tremendous benefit to students within the teaching and learning environment it is also recognised that the unlimited and unrestricted usage of 3G and 4G internet access can pose a risk to the safety of students. The College will not seek to block access to the internet by these means but we do commit to a consistent teaching and awareness approach with students of the dangers presented by the internet and how they can be mitigated.*

## **5. Education — parents/carers**

Many parents and carers have only a limited understanding of on-line safety risks and issues, yet they play an essential role in the education of their children and in the monitoring/regulation of their sons' and daughters' on-line experiences. The College will therefore seek to provide information and awareness to parents and carers through the College website and awareness sessions offered at parents' evenings. We are in regular contact with parents and carers. Our communications will be used to reinforce the importance of children being safe online

## **6. Use of digital and video images**

When using digital images, staff should inform and educate students about the risks associated with the taking, use, sharing, publication and distribution of images. They should recognise the risks attached to publishing their own images on the internet e.g. on social networking sites.

Staff can take digital/video images to support educational aims, but must follow College policies concerning the sharing, distribution and publication of those images, where parental/student permission is given (on parental consent forms). Care should be taken when taking digital/video images that students are appropriately dressed and are not participating in activities that might bring the individuals or the College into disrepute.

Images must not be taken, shared, published or distributed without the permission of the subject.

Photographs published on the College website, or elsewhere that include students will be selected carefully and will comply with good practice guidance on the use of such images. Students' full names will not be used anywhere on a website or blog, particularly in association with photographs. Written permission from parents or carers will be obtained before photographs of students are published on the College website or prospectus. Student's work can only be published with the permission of the student and parents or carers.

## **7. Social Media**

Whilst valuing the use of social media (Facebook, Twitter etc.) as an educational and marketing tool, staff and students need to be aware of the risks associated with its use. Items published on social networks have the potential to remain available forever and may cause harm or embarrassment to individuals or the College in the short or longer term. Publishing negative or untrue items about an individual or organisation can lead to College disciplinary, civil action and/or criminal prosecution.

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 instances of cyber-bullying and/or harassment will be investigated thoroughly and addressed through the relevant policy. Sending 'nudes or semi-nudes' is an increasingly common activity among children and young people, where they take and share inappropriate or explicit images online or through mobile phones. It can also refer to written messages.

Sharing nudes or semi-nudes can leave children/ young people vulnerable to:

- Blackmail - An offender may threaten to share the pictures with the child's family and friends unless the child sends money or more images.
- Bullying - If images are shared with their peers or in school, the child may be bullied.
- Unwanted attention - Images posted online can attract the attention of sex offenders, who know how to search for, collect and modify images.

- Emotional distress – Young people can feel embarrassed and humiliated. If they are very distressed this could lead to [suicide](#) or [self-harm](#).

Staff using social media for educational or other College work purposes, are responsible for the monitoring of its content.

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 including WhatsApp, Snapchat etc. 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.

Advice for Staff in the event of a young person telling you that they have received indecent images:

- Do not ask to view the images
- Never copy, print or ask for them to be shared (it's illegal)
- Contact the DSL or one of her deputies to ensure any safeguarding needs are addressed and appropriate referrals made.
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The basic safeguarding principle is, if a child is at risk of harm, is in immediate danger, or has been harmed, speak to the DSL or one of her deputies.

## **8. External Guidance**

The Department for Education (DfE) KCSiE 2023, makes it clear that colleges should be aware of the risks and teach children and all learners, how to stay safe online.

Governing bodies, staff and learners can be assured that:

The college has appropriate filtering and monitoring systems in place and they are regularly reviewed their effectiveness.

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.

The College uses 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, this is now included in the Job description of the DSL.
- 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).

The College filters and monitors all student 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 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.

### **Information Security and Cyber Security**

Education settings are directly responsible for ensuring they have the appropriate level of security protection procedures in place in order to safeguard their systems, staff and learners and review the effectiveness of these procedures periodically to keep up with evolving cyber-crime technologies.

The College meets the Cyber security standards for schools and colleges.GOV.UK.

### **9. Actions**

The following actions must be taken by all staff :

- All staff and learners have a responsibility to work together to ensure that abuse does not occur, or where it is found, action is taken
- Staff must ensure ground rules are set in induction and that learners are made aware of the college response to online abuse, what constitutes abuse and how any incidents will be addressed through the Relationships and Behaviour Policy.
- Staff must ensure that all learners know how to stay safe on line. This particularly important for for under 18s, and those under the age of 25 in receipt of an EHCP and/or high needs funding.
- Staff receiving reports of online safety concerns, including incidents that take place off College premises, must take appropriate action to follow up all allegations/incidents and trigger an investigation which will be managed in line with the Relationships and Behaviour Policy. Sanctions against perpetrators may include suspension whilst an investigation takes place
- Staff must ensure appropriate managers are notified. This includes the 14-16 Manager for a learner who is under the age of 16 (e.g. Y10/11) at the start of the academic year and the Head of Foundation Skills for a learner under the age of 25 who is in receipt of an EHCP and/or high needs funding
- All staff involved must carefully consider the potential impact of the abuse on both the alleged perpetrator/s and the alleged victim/s and refer those involved for additional support from the Safeguarding team as appropriate. Significant concerns must be referred to the DSL or one of her deputiesfor safeguarding following the

referral routes outlined in Appendix A (child and adult protection) of the Safeguarding Policy.

#### 10. College expectations for 1:1 sessions:

- Ensure you have completed your annual safeguarding training. This training is sent from human resources and is a mandatory requirement
- All staff must read at least Part one of 'Keeping Children Safe in Education' 2023 (this is an appendix to the Safeguarding Policy that is available on the Gateway) and all staff who are working directly with students must read Annex B (also available on the Gateway as an appendix to the Safeguarding Policy).
- You are aware of the key areas of risk for students and ensure that they understand how to stay safe (reinforcement is key).
- You understand and have agreed the protocols and timing of all sessions including 1-1 online activities with under 18s, students under the age of 25 with EHCPs, or vulnerable adults with parents / carers prior to the session / 1-1 taking place
- 1-1 online sessions must only take place at the days / times agreed with parents/carers for under 18s, students under the age of 25 with EHCPs, or vulnerable adults
- Consent for 1-1 sessions (if parents cannot be present), should be gained prior to the session from parents/carers under 18s, students under the age of 25 with EHCPs, or vulnerable adults (consent form available on the Gateway)
- If at any time you feel uncomfortable with something done or said during a 1-1 session, you should end the contact as soon as possible and report any concerns to your line manager and / or safeguarding officer
- Consider appropriate location, dress, and conduct
- Be conscious of confidentiality between staff and students when working online
- Ensure that registers are completed for any online sessions
- Make students and parents/carers for under 18s, students under the age of 25 with EHCPs, or vulnerable adults, aware if any sessions are to be recorded
- Ensure any concerns identified during online teaching sessions are referred following normal safeguarding reporting procedures (Pro Monitor unless immediate risk of harm, in which case you would contact your safeguarding officer).

Make sure you do...	Make sure you don't...
<ul style="list-style-type: none"> <li>• Talk to students regularly about the benefits and risks of the online world and give them space to ask questions</li> <li>• If recording videos or live streaming lessons, make sure to film in a neutral area where nothing personal or inappropriate can be seen or heard in the background.</li> <li>• Ensure that all online sessions with students are conducted via Microsoft Teams, other platforms such as Zoom are not permitted (this includes 1:1 sessions)</li> </ul>	<ul style="list-style-type: none"> <li>• Use any personal accounts for communication with students and parents/carers</li> <li>• Position yourself with other people or pets in view; what is around and behind you can be seen</li> <li>• Leave applications open that may show personal or confidential information when you are sharing your screen</li> </ul>

<ul style="list-style-type: none"> <li>• Record any live classes (where appropriate) so that the video can be reviewed if any issues arise</li> <li>• Remind students that all audio / video may be recorded, to safeguard both parties and this would not routinely be shared</li> <li>• Use the 'blur background option' to hide any background if needed</li> </ul>	<ul style="list-style-type: none"> <li>•</li> </ul>
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Further information is included in the Student Services Induction, Tutorial resources and on the College Group Gateway website "Safeguarding (including Prevent)".

Useful further guidance:

<https://www.tes.com/news/coronavirus-10-safeguarding-rules-teachers-home>

<https://learning.nspcc.org.uk/news/2020/march/undertaking-remote-teaching-safely/>

<https://www.nspcc.org.uk/keeping-children-safe/online-safety/internet-connected-devices/>

### 11. Guidance for implementation

Any allegation or incidence of a breach of On-line safety for staff or students must be taken seriously and investigated appropriately. In the first instance the incident or allegation must be reported to a member of the Safeguarding Team and Curriculum Manager or to the reporting person's immediate line manager.

The allegation or incident will then be subject to a formal investigation with the findings recorded and subsequent actions taken as appropriate.

### 12. Useful Information

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

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

[UK safer internet centre](#) – Contains specialist helpline for UK Schools and Colleges

Internet matters – Help for parents on how to keep their children safe online

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

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

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

[Education for a Connected World](#) from the UK Council for Internet Safety supports the development of the curriculum and is of particular relevance to RSHE education and Computing. It is designed, however, to be usable across the curriculum and beyond (covering early years through to age 18) and to be central to a whole school or college approach to safeguarding and online safety

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

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

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



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

#### **1. Purpose and content**

The purpose of this appendix of the College Safeguarding Policy is to provide a clear set of guidelines to learners, their parent/carers; and staff and other workers within the College community; together with wider stakeholders regarding how the College will provide additional monitoring and support to ensure the protection of the most vulnerable. This includes Children in Our Care (CiOC) (previously referred to as Looked After Children), care leavers, care experienced learners, learners under the age of 16 at the start of the academic year (Y10/Y11 or 14-16s) and learners with Special Educational Needs or Disabilities.

The College Safeguarding Policy has been developed in line with statutory guidance and the locally agreed inter-agency procedures put in place by Hartlepool & Stockton Safeguarding Children's Partnership and South Tees Safeguarding Children's Partnership.

#### **2. Children in Our Care, Care Leavers and all care Experienced Children.**

The College recognises the particular vulnerability of Children in Our Care and those who have left care and has put the following actions in place:

The Children in Our Care Welfare Officer works specifically with learners identified as belonging to this group. She works alongside the Safeguarding Officer at each College location and together they have oversight of all CiOC and Care Leavers at their college campus.

- This includes maintaining a record for each learner that includes:
  - The name of their social worker or personal advisor as appropriate
  - The name and contact details of the local authority Virtual Headteacher for each learner
  - Course details
  - Details of all agencies involved
  - Information about care arrangements
- The College Safeguarding Officer and CiOC Welfare Officer will ensure all other relevant staff, including, personal tutors and managers are aware of CiOC and care leavers (where known to the College) on their site or provision by logging details centrally on Pro-Solution (for both groups). This information will then be imported to the relevant student information database.
- This information will also be shared at meetings with curriculum colleagues and with Principals in site specific meetings.

- The Safeguarding Officer for each site will review the progress of each CiOC learner care leaver through statutory meetings. Where concerns about progress are identified appropriate interventions must be implemented and reviewed in a timely way , including sharing of information with relevant agencies.
- The Safeguarding Officer or relevant High Needs manager for each site will ensure appropriate representation at Personal and Education Plan (PEP) or other meetings and the subsequent review of the online PEP system.
- Concerns about safeguarding issues should be referred following the usual referral routes in Appendix A Definition & Indicators of Abuse..

### **3. 14-16s**

- The 14-16 Manager has oversight of all Y10/Y11 learners. This includes maintaining a record for each learner covering:
  - The name and contact details of their school where appropriate
  - Course and personal tutor details
  - Details of all agencies involved
- The 14-16 Manager will ensure all personal tutors and managers are aware of learners on their provision who are aged less than 16 at the start of the academic year and will ensure all staff are aware of the guidance and procedures that must be followed for this group of learners
- A flag will be added to the learners ILP in Pro-Monitor indicating 'Under 16',
- All staff involved with Y10/Y11 learners must adhere to the guidance and procedures; and also provide additional monitoring and support where needed. It must be noted that no 14-16 learner may be educated in a class where a learner is 19 years old at the beginning of the academic year. Exceptions to this are where a learner who is 19 years old has an EHCP. Where a learner aged 19 or above with an EHCP is likely to be in class, a risk panel must be convened to establish if any risks are mitigated as a result of the support assigned to either learner. See Appendix K, Risk Assessment panels, for further information.

Concerns about safeguarding issues should be referred to the relevant Safeguarding Officer following the referral routes in Appendix A, Definitions and Indicators of Abuse the 14-16 Manager must also be notified at the earliest opportunity.

### **4. Learners with learning difficulties and/or disabilities**

Research demonstrates that children with a disability are four times more likely to be abused and all children with a disability are classified as children in need. It is also widely recognised that those with Special Educational Needs and Disabilities (SEND) can face additional safeguarding challenges. These include:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the learner's disability without further exploration
- These learners being more prone to peer group isolation or bullying (including prejudice-based bullying) than other learners

- The potential for learners with SEN, disabilities and certain medical conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs
- Communication barriers and difficulties in managing or reporting these barriers

All staff must be aware of, and consider, the above factors and any concerns about safeguarding issues should be referred to a The DSL or one of her deputies for safeguarding following the referral routes in Appendix A, Definitions and Indicators of Abuse.. If there is a safeguarding concern regarding a learner aged under 25 years of age who is in receipt of an Education and Health Care Plan and/or high needs funding, the High Needs Manager must also be notified at the earliest opportunity.

### Prevent

#### 1. Purpose and content

The purpose of this appendix of the College Safeguarding Policy is to provide a clear set of guidelines to staff regarding the actions they must take to contribute to the College duty to have due regard to preventing people from being drawn into terrorism or extremism. This includes those immediate actions they must take if they become aware that a learner or member of staff presents a threat to themselves and/or others.

Children and adults may be susceptible to extremist ideology and radicalisation and this should be treated as a safeguarding concern. Similar to protecting children and adults from other forms of harms and abuse, protecting children and adults from this risk is a part of the Whole College safeguarding approach. Staff should recognise the 'it could happen here'.

#### 2. Definitions

The UK Government (2015) define terms as:

- **Fundamental British Values:**
  - **Democracy**
  - **The rule of law**
  - **Individual liberty**
  - **Mutual respect and tolerance for those with different faiths and beliefs**
- **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.
- **Entryism:** Extremist individuals, groups and organisations consciously seeking to gain positions of influence to better enable them to promote extremist agendas
- **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
- **Silver Group:** A local multi-agency advisory forum to share information on and intelligence about current potential extremist risks in the local area and actions being taken by local agencies to reduce or remove extremism and terrorist activity
- **Disinformation:** Fake or misleading stories created and shared deliberately, often by a writer who might have a financial or political motive
- **Misinformation:** This also means fake or misleading stories, but in this case the stories may not have been deliberately created or shared with the intention to mislead
- **Conspiracy theories:** Conspiracy theories offer a simplifying model for all that cannot be explained or easily understood. They typically involve an 'alternative' explanation for an event or situation to those provided by governments and official international bodies, sometimes suggesting a group, individual or organisation is responsible or hiding information from the public.

### 3. Legislative framework and rationale

The Government deems that the UK is currently at 'Substantial' risk of international terrorism, meaning an attack is likely.

Section 26 of the Counter-Terrorism and Security Act 2015 (the Act) places a duty on certain bodies, including further education colleges, to have 'due regard to the need to prevent people from being drawn into terrorism', this is known as the Prevent duty.

The Prevent duty means the College needs to demonstrate an awareness and understanding of the risk of radicalisation; both within the College and locally; and put appropriate measures in place. This includes:

- establishing or using existing mechanisms for understanding the risk of radicalisation
- ensuring staff understand the risk and building College capability to deal with it
- communicating and promoting the importance of the duty
- ensuring staff implement the duty effectively.
- The duty also requires the College to 'actively promote' the British Values above.

### 4. College response

The Governing Body is responsible for ensuring clarity of culture, mission and values in the College and is committed to ensuring College safeguarding (including Prevent) arrangements are developed with reference to the policies and procedures of the local authority, all relevant legislation and guidance, as well as good practice identified in the sector; including that shared by Ofsted. The governing body has identified, amongst other risks, the particular risks associated with entryism and has actions in place to ensure this is prevented. This includes the vetting of potential governors and the suspension of governors in certain circumstances.

### 5. Other key College actions are:

- **Implementation of a Prevent risk assessment plan:**
  - Actions are fully reviewed and revised at least yearly by the College Designated Safeguarding Lead.
  - Progress on the plan is reported to, and evaluated by, the College Safeguarding Group which is chaired by the Strategic Lead for Safeguarding (Director of Quality) ) and to the Governing Body through FE Corporation
  - This risk assessment plan includes actions relating to external speakers, IT policies, the learner voice, subcontractors and the College tutorial system.
  
- **Training in Prevent:**
  - The College has established a mandatory safeguarding training schedule that includes a safeguarding (including Prevent) induction, annual update training on safeguarding (including Prevent) (see Appendix L, Arrangements for Safeguarding Training).
  - The training includes raising awareness of local threats and the following potential signs and symptoms that may indicate a person is at risk of being drawn into terrorism:
    - **Specific influences:** e.g. friends, family, online contacts and recent conversion to a cause/religion
    - **Personal vulnerability:** e.g. identity confusion, victim of/witness to hate crime and family conflict over beliefs/lifestyle
    - **Intolerance & rhetoric:** e.g. extremist views in relation to particular groups
    - **Changes in appearance or behaviour:** e.g. adopting the dress of particular groups, moving away from previous friends who are not connected to the group and spending much more time online
    - **Possession of material/symbols** that are associated with an extremist cause; e.g. swastika
  
- **Embedding of fundamental British Values into the College culture:**
  - All staff must promote the ethos of fundamental British values in their day to day work and curriculum staff must ensure these values are promoted to learners through teaching, learning and assessment.
  - Staff and learners need to have an understanding and appreciation of the culture and needs of others and understand how to ensure every learner feels they have a place in the College community. Curriculum staff must also ensure learners understand how to keep themselves safe from the risks of radicalisation and terrorism through the tutorial programme. Support and guidance in delivery of the tutorial programme in relation to fundamental British values and Prevent is available from Student Services
  - Staff and learners must promote fundamental British values. Poor behaviour will be dealt with in accordance with the Staff Code of Conduct and the learner

Relationships and Behaviour Policy and referral made to the Police and the Channel panel if appropriate

- College managers, who observe teaching, learning and assessment as part of their role, must ensure they monitor the promotion and embedding of fundamental British values and take necessary action in relation to concerns in a timely way
- **Co-operation with the police and local authorities:**
  - The College is represented on existing multi-agency forums and will cooperate with external bodies wherever appropriate
- **Information sharing and referral:**
  - The College has robust procedures both internally and externally for sharing information about vulnerable individuals:
  - Following a notice-check-share approach; all concerns, and queries relating to radicalisation and terrorism, must be urgently referred to the Designated Safeguarding Lead (DSL) or one of her deputies for safeguarding following the referral routes outlined in Appendix A (Definitions and Indicators of Abuse)) and Appendix P (Allegations and Whistleblowing) of the Safeguarding Policy.
  - The Designated Person will refer cases, as appropriate to Channel or the Police, and may also share, and receive, information with/from other institutions and key partners, such as the local Prevent Silver group and the Police community safety team
  - If a member of staff identifies someone may already be engaged in illegal terrorist-related activity this must be immediately referred to the Designated Lead for safeguarding or in their absence the Group Principal or the most senior member of staff available so the police can be immediately alerted.
- **College policies and procedures:**
  - Policy owners must review policies for inclusion of relevant Prevent actions and take appropriate action where needed in a timely way to ensure full compliance with the College Prevent duty
- **Learner voice:**
  - The Head of Quality will monitor learners' understanding of how to stay safe from the risks associated with radicalisation, terrorism and extremism through focus groups and surveys
- **Fundraising:**
  - The College takes its responsibility to ensure that fundraising does not provide funding to extremist groups or fund terrorist activities seriously
  - Fundraising activities are managed by either the by the Student Support & Wellbeing team, or by a Curriculum Department (for example the Prince's Trust) to support a community venture or charity

- All fundraising must include a review of the uses of the funds raised with any areas of concern referred to the Finance Director
- **Online and e-Safety**
  - The College has policies relating to the use of its IT systems and devices both on and off College premises. IT policies and procedures contain specific reference to the Prevent duty
  - The College uses filtering and monitoring as a means of restricting access to harmful content, this also ensures that learners who have accessed harmful content are identified and safeguarding risk is assessed and acted upon following safeguarding procedures..
  - Full guidance is available in the ILT and E-Safety Regulations and Social Media Policy. These are available on the ICLT section of the policies and procedures site on the staff gateway

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

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, this is now included in the Job description of the DSL.
- 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).

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. (Keeping Children Safe in Education 2023, Para 142)

We filter and monitor all student 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.

- **Outside organisation promotional materials**
  - The College takes seriously its responsibility to ensure that publications and promotional materials that are brought into its campuses do not promote extremist views, or are supportive of terrorist organisations
- **Subcontractors**
  - The College works with a number of subcontractors in its delivery of education
  - Subcontractors complete an annual application to work with the College. In this application they are required to provide assurance that they will adopt and



promote fundamental British values within their delivery, and that they will not promote or engage in extremist related activities or propaganda

- All aspects of subcontractor compliance with the Prevent duty are overseen by the Director of Business Development
- **Visitors and visiting speakers/events**
  - Staff must ensure all visitors to the College adhere to the requirements of the Visitors to College Premises policy. This policy is available on the facilities section of the policies and procedures of the staff Gateway/Share point site
  - Visiting speakers can provide a greatly enhanced experience to learners, and can contribute significantly to the College tutorial programme. Nevertheless, the College takes seriously its responsibility to balance the need to allow debate of controversial issues with the duty to prevent those promoting extremist views from influencing College learners
  - All staff organising a visiting speaker or event must carry out a risk assessment that includes an online search of publicly available information relating to both the speaker and the organisation they represent as appropriate. The risk assessment must be reviewed by the appropriate manager who will discuss any concerns with the DSL prior to approval/rejection by the manager and DSL
  - Visiting speakers who are deemed to have extremist views which pose a safeguarding risk must not be invited into the College
  - All visiting speakers must sign in as a visitor and be accompanied by a member of staff at all times. Staff must interject or stop an event if they feel that the speaker is promoting extremist views or inequality in any form.

## **6. Roles and responsibilities of specific College staff**

- **Designated Safeguarding Lead:**
  - Liaising with local Prevent Coordinators
  - Attending the Silver Group Partnership
  - Ensuring the effective use of the CHANNEL, and police, referral processes
  - Overseeing the training of staff
- **Safeguarding Officers:**
  - Referring concerns to appropriate agencies
  - Supporting individual learners who are working with agencies
  - Supporting groups of learners or individuals who have been impacted by or exposed to any activity which might provide an opportunity to any extremist group. This might take the form of mentoring, monitoring or providing access to other agencies
  - Supporting and delivering training to staff
- **Student Support & Wellbeing team:**
  - Providing resources to promote fundamental British values within the tutorial & enrichment programme

- Ensuring planned cultural and religious events are well conceived, effectively managed, and give consideration to the College Prevent duty
- Monitoring the College faith and contemplation room. This room is available for use by individuals of any denomination and accessible at all times. It is checked weekly by a member of the Student Services team to ensure that extremist literature is not displayed.
- Monitoring and oversight of the activity of the Students' Union
- Monitoring and oversight of other formal groups or societies within the student body
- Group Executive Director: Planning & Infrastructure:
  - Ensuring a robust disaster management/emergency plan is in place and will be responsive to a terrorist threat
  - Maintaining a proportionate and appropriate level of campus security including the enforcement of appropriate ID for staff, learners and visitors
  - Ensuring that the IT hardware and software provides filtering against, and monitoring of, extremist and terrorist activity
  - Ensuring external lettings of College premises adhere to Prevent duty requirements
- Group Executive Director: Finance
  - Ensuring funds raised or generated by the College are not used to fund terrorist activity
- Director of the Business Development Unit
  - Ensuring College sub-contractors discharge their Prevent duty in line with requirements

Linked Policies - Facilities – [External Lettings](#)

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

#### **1. Purpose and content**

The purpose of this appendix of the College Safeguarding Policy is to provide a clear set of guidelines to staff regarding the actions they must take if they become aware that a learner is at risk of or, is suspected of currently, being exploited by county lines gangs.

#### **Definitions**

##### **Child Criminal Exploitation and Child Sexual Exploitation**

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.

- **County Lines:** County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs using dedicated mobile phone lines or other form of “deal line”. This activity can happen locally as well as across the UK - no specified distance of travel is required. Children and vulnerable adults are exploited to move, store and sell drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims.
- **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.

- **Dead Lines:** Dedicated Mobile phones to take orders for drugs
- **Cuckooing:** When perpetrators take over homes belonging to vulnerable people to operate their criminal activity from
- **Plugging:** where drugs are concealed internally to avoid detection.

## 2. External guidance

[Child-sexual-exploitation-definition-and-guide-for-practitioners. Gov.UK](#)  
[Home Office and The Children's Society County Lines Toolkit For Professionals](#)

## 3. How County Lines Exploitation Affects Young People and Vulnerable Adults

Like other forms of abuse and exploitation, county lines exploitation:

- can affect any child or young person (male or female) under the age of 18 years
- can affect any vulnerable adult over the age of 18 years
- can still be exploitation even if the activity appears consensual
- can involve force and/or enticement-based methods of compliance and is often accompanied by violence or threats of violence
- can be perpetrated by individuals or groups, males or females, and young people or adults; and
- is typified by some form of power imbalance in favour of those perpetrating the exploitation. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, cognitive ability, physical strength, status, and access to economic or other resources.

One of the key factors found in most cases of county lines exploitation is the presence of some form of exchange (e.g. carrying drugs in return for something). Where it is the victim who is offered, promised or given something they need or want, the exchange can include both tangible (such as money, drugs or clothes) and intangible rewards (such as status, protection or perceived friendship or affection). It is important to remember the unequal power dynamic within which this exchange occurs and to remember that the receipt of something by a young person or vulnerable adult does not make them any less of a victim. It is also important to note that the prevention of something negative can also fulfil the requirement for exchange, for example a young person who engages in county lines activity to stop someone carrying out a threat to harm his/her family.

## 4. Who Is Vulnerable?

The national picture on county lines continues to develop but there are recorded cases of:

- children as young as 12 years old being exploited or moved by gangs to courier drugs out of their local area; 15-16 years is the most common age range
- Both males and females being exploited

- White British children being targeted because gangs perceive they are more likely to evade police detection but a person of any ethnicity or nationality may be exploited
- The use of social media to make initial contact with children and young people
- class 'A' drug users being targeted so that gangs can take over their homes (known as 'cuckooing').

County lines exploitation is geographically widespread operating throughout England, Wales and Scotland. Gangs are known to target vulnerable children and adults; some of the factors that heighten a person's vulnerability include:

- Having prior experience of neglect, physical and/or sexual abuse
- Lack of a safe/stable home environment, now or in the past (domestic violence or parental substance misuse, mental health issues or criminality, for example)
- Social isolation or social difficulties
- Economic vulnerability
- Homelessness or insecure accommodation status
- Connections with other people involved in gangs
- Having a physical or learning disability
- Having mental health or substance misuse issues;
- Being in care (particularly those in residential care and those with interrupted care histories), so this might be Children in Our Care (previously LAC) or adults in a care setting.
- Being excluded from mainstream education

**The Signs to Look Out For**  
5. Some of the following can be indicators of both child criminal and sexual exploitation where children:

- appear with unexplained gifts, money or new possessions
- associate with other children involved in exploitation
- suffer from changes in emotional well-being
- misuse alcohol and other drugs
- go missing for periods of time or regularly come home late, and
- regularly miss school or education or do not take part in education.

**Children who have been exploited will need additional support to help keep them in education.**

**Child Sexual Exploitation (CSE)** can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence.

**Some additional specific indicators that may be present in CSE** are children who:

- have older boyfriends or girlfriends; and
- suffer from sexually transmitted infections, display sexual behaviours beyond expected sexual development or become pregnant.

A number of the indicators for CSE and CCE as detailed above may be applicable to where children are involved in county lines.

**Some additional specific indicators that may be present where a child is criminally exploited through involvement in county lines are children who:**

- go missing and are subsequently found in areas away from their home

- have been the victim or perpetrator of serious violence (e.g. knife crime)
- are involved in receiving requests for drugs via a phone line, moving drugs, handing over and collecting money for drugs
- are exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection
- are found in accommodation that they have no connection with, often called a 'trap house or cuckooing' or hotel room where there is drug activity
- owe a 'debt bond' to their exploiters
- have their bank accounts used to facilitate drug dealing.

Any concerns regarding Criminal Exploitation and County Lines should be referred to the safeguarding team using the processes set out in Appendix A, Child and Vulnerable Adult Protection, of this policy.

### Early Help Referrals

#### 1. Purpose and content

The purpose of this appendix of the College Safeguarding Policy is to provide a clear set of guidelines to staff regarding identifying young people who would benefit from a multi-agency response to issues affecting the young person or their family.

#### 2. 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. Chapter one of 'Working Together to Safeguard Children 2023' provides detailed guidance on the Early Help process. The Safeguarding Team will be responsible for implementing any Early Help measures which are required.

#### 3. The Need for Early Help

**Any** child or young person may benefit from early help, but all college staff should be particularly alert to the potential need for early help for a young person 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, criminal or sexual exploitation;
- is at risk of 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 problems or domestic abuse;
- is misusing drugs or alcohol themselves;
- has returned home to their family from care;
- is at risk of so called, 'honour' based abuse such as Female Genital Mutilation (FGM) or Forced Marriage;
- is a privately fostered child;
- is persistently absent from education including persistent absences for part of the school day.

Early Help is useful where a child and family would benefit from co-ordinated support from more than one agency (e.g. education, health, housing, police) there should be an inter-agency assessment. These early assessments should identify what help the child and family require to prevent needs escalating to a point where intervention would be needed via a statutory assessment under the Children Act 2004 1989.

#### **4. Making an Early Help Referral**

If you suspect a young person would benefit from Early Help to prevent issues from escalating to a Child in Need at a later point, you should contact your site Safeguarding Officer or Welfare Team.

The Safeguarding or Welfare Team will work with you to complete an Early Help Assessment which will establish the level of need of the young person. If the level of need meets the requirement for referral an Early Help Assessment will be sent to the local Children's Hub.

If the level of need does not meet the threshold for an early help referral, the Safeguarding and Welfare Team will work with you to implement support to best suit the young person's needs. It is essential that the young person, the safeguarding and welfare team and you as the referrer work together to support the young person.

If the young person's circumstances change or the situation does not improve, consideration should be made to review using the early help assessment framework and take the necessary action.

#### **5. Effective Early Help**

**For an early help assessment to be effective:**

- The assessment should be undertaken with the agreement of the child and their parents or carers. It should involve the child and family as well as all the professionals who are working with them.
- A teacher or tutor, with the Safeguarding Officer or Welfare Team, GP, health visitor, early years' worker or other professional should be able to discuss concerns they may have about a child and family with a social worker in the local authority. Local authority children's social care should set out the process for how this will happen; and
- If parents and/or the child do not consent to an early help assessment, then the lead professional should make a judgement as to whether, without help, the needs of the child will escalate. If so, a referral into local authority children's social care may be necessary.

If at any time it is considered that the child may be a child in need as defined in the Children Act 1989, or that the child has suffered significant harm or is likely to do so, a referral should be made immediately to local authority children's social care. This referral can be made by any



professional, however, the Designated Safeguarding Lead, or deputies, in college should make the final decision and lead on the referral.

### Making a Safeguarding Referral

#### 1. Purpose and content

The purpose of this appendix of the College Safeguarding Policy is to provide a clear set of guidelines to staff regarding making a referral to the College Safeguarding Team.

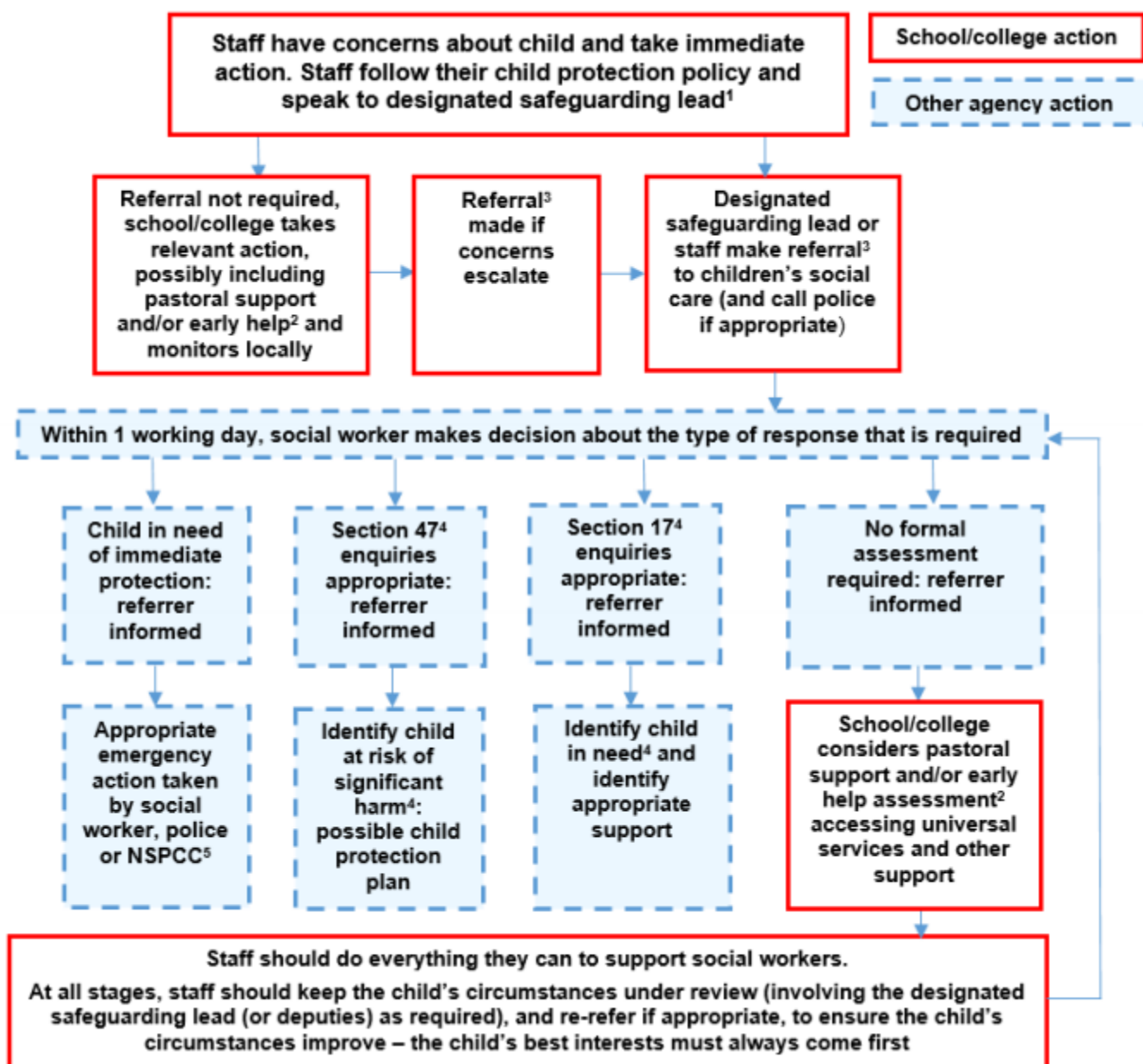
It also provides guidance for staff to make a referral to children's social care, adult services or the police. Staff should only consider making a direct referral when a young person or vulnerable adult is at immediate risk of serious harm and a designated safeguarding officer is not available or it would put the young person or vulnerable adult in more danger in the time taken to consult with the designated safeguarding officer. The exception is that curriculum staff should make a direct referral to police in the case of Female Genital Mutilation where they discover that FGM appears to have been carried out on a girl under 18 years of age.

It is important to note that any member of staff at the college is able to make a referral to children's social care, adult services or the police, however, the college has a team of trained staff who, under normal circumstances, are designated to make the final decision on when to refer and will make the referral on behalf of the college.

Designated Lead for Safeguarding (DSL)	<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 – Deputy DSL (DDSL)	<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>
Deputy DSL – line managed by Student Support and Wellbeing Manager – Safeguarding and Welfare  Primary working site is identified next to everyone; however, each member of the team can support group wide.	<b>Alice Reid</b> Advanced Safeguarding Practitioner (SRC) <ul style="list-style-type: none"> <li>Email – <a href="mailto:alice.reid@stockton.ac.uk">alice.reid@stockton.ac.uk</a></li> <li>T: 01642 865530 M: 07970 982324</li> </ul> <b>Leanne Keane-Barker</b> Advanced Safeguarding and Welfare Practitioner (SRC/NETA) Email: <a href="mailto:Leanne.keane-barker@stockton.ac.uk">Leanne.keane-barker@stockton.ac.uk</a> <ul style="list-style-type: none"> <li>M: 07702521009</li> </ul>

	<p><b>Katie Todd</b> Advanced Safeguarding Practitioner (SRC/NETA)</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> <p><b>Tracy Williams</b> Advanced Safeguarding Practitioner (RCC)</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> <p><b>Rachel O’Riordan</b> Advanced Safeguarding Practitioner (Bede)</p> <ul style="list-style-type: none"> <li>• Email – <a href="mailto:rachel.oriordan@stockton.ac.uk">rachel.oriordan@stockton.ac.uk</a></li> <li>• Telephone – 07590 864913</li> </ul> <p><b>Christine Cook</b> Advanced Safeguarding and Welfare Practitioner (TSA)</p> <ul style="list-style-type: none"> <li>• Email – <a href="mailto:christine.cook2@stockton.ac.uk">christine.cook2@stockton.ac.uk</a></li> <li>• Telephone – 07968107338</li> </ul>
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The information below is taken from the Keeping Children Safe in Education 2023 DfE Statutory Guidance and sets out actions to take if there are concerns about a young person.



Making a referral to the College Safeguarding Team

*Reporting Safeguarding Concerns*

### College objectives:

- To provide a safe environment for children, young people and vulnerable adults to learn and develop in
- To identify people who are experiencing, or likely to experience significant harm, or are at risk of being drawn into radicalisation/terrorism
- To provide support and take appropriate action, with the objective of producing positive outcomes for the affected student(s) through both internal and external support mechanisms
- To safeguard through the curriculum and pastoral support and by the promotion of a college ethos where students feel secure, valued and listened to.

### Reporting procedures

If a member of staff suspects or knows of concerns about a person, or if a person discloses matters that give rise to concerns, you have a responsibility to act on those concerns immediately. Where that allegation is against another member of staff it must be reported directly to the Principal, or if the allegation is about the Principal, directly to the Chair of Governors. The Designated Safeguarding Lead can advise on any concerns of this nature.

#### If someone makes a Safeguarding disclosure:

**LISTEN** carefully, stay calm; do not express shock or embarrassment

**DO NOT** guarantee confidentiality, but be clear that you will act sensitively and explain what will happen next

**GIVE REASSURANCE** that you are taking the information seriously

**DO NOT** ask leading questions

**DO NOT** examine any physical injuries

**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, as above.



#### Recognise the issue

Disclosure made to staff member or incident occurs



#### Respond

Reassure the person, but do not imply confidentiality



#### Record details of disclosure/incident

Write down specifics; do not ask leading questions. Do not be judgemental.



#### Report the matter to a member of the Safeguarding Team as soon as possible.

If the incident occurs out of hours, the Emergency Duty Team provides an out-of-hours response to emergency situations involving child protection and the care of a child. They can be contacted via telephone: **01642 524 552**, or telephone the Police.

#### Always err on the side of caution



**Safeguarding Team Officer(s)** review the record, consult with colleagues, and make judgement about next steps (internal/external support, referral to external agencies).



**Actions taken** are reported back to the initial referrer to be passed to the individual(s) concerned, if appropriate.



**Safeguarding Team** meets and reviews all cases.

## **Staff Referral Guide – Prevent (Please use the same referral process as for any safeguarding concern)**

There isn't a single profile of someone who may be at risk of being drawn into terrorism. People who are vulnerable to becoming involved in terrorism can be any age, from any group, faith, ethnicity or background. As well as religious extremism, the Prevent agenda is also very concerned with political extremism from both the far Left and the far Right, as well as some radical animal rights and environmental activists. There are many factors associated with a person who can become vulnerable to being drawn into extremist or terrorist activity. Prevent is about keeping our students safe from the risk of being drawn into radicalisation/terrorism and staff have a key role to play in this endeavour. All staff have a moral and legal duty to protect students from the risk of radicalisation.

As frontline staff in regular contact with students and members of the public, you may often be the first to feel some concerns. However, even though you might see some of the tell-tale signs, you may not always realise what they can indicate. Your vigilance is vital, and even small concerns may be of significance when put into a larger picture. If you have any concerns that somebody may be at risk of being drawn into extremist or terrorist activity, what would you do? How would you keep them safe?

### **You should pass it on!**

- The key consideration in making a referral to the Safeguarding Team with a Prevent concern, is that something has caused you to have that concern in the first place – no matter how small or insignificant.
- If in doubt, refer anyway - use the flowchart above. **Always err on the side of caution.**
- If you have any concern at all about an individual or group of individuals, no matter how trivial you think it might be, **always** refer onto a member of the Safeguarding Team or ask them for advice.
- If you are concerned that the College, students and/or other members of the public are at **imminent** risk of **harm**, then telephone the Police direct and alert the Duty Manager immediately.
- The Safeguarding team will review all referred cases and where appropriate make referrals onwards to external agencies. Referrals are designed to ensure that individuals receive the support and help they need to move away from radicalised, extremist behaviours.

### Conviction Disclosure & Safeguarding Risk Assessment Panels

#### 1. Purpose

The Education, Training Collective (Etc.) is committed to providing, creating and maintaining an atmosphere which is conducive to the academic and social well-being of the College community and each of its campuses or training centres.

The purpose of this appendix of the College Safeguarding Policy is to provide a clear set of guidelines to applicants, parent/carers, current students and staff regarding the need for potential and current students to declare unspent criminal conviction(s), cautions, pending charges, inclusion on the sex offenders register or police investigations. This appendix considers all applicants and students on all programmes.

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

The College has a duty of care to students, staff, visitors and clients. In order to discharge this duty it is incumbent upon the College to consider the impact of any unspent criminal conviction(s)<sup>1</sup> (see Appendix 1 for rehabilitation periods), cautions, pending charges, inclusion on the sex offenders register or police investigations.

The College defines relevant and un-spent convictions in line with the Rehabilitation of Offenders Act 1974 (ROA) (Exceptions) Order 1975 (amendment) Order 2019 Appendix 1.

This appendix of the Safeguarding Policy operates in consideration of relevant statutory legislation and professional body requirements.

#### 2. General Principles

There is a requirement for all students applying for courses and current students to declare unspent criminal conviction(s), cautions, pending charges inclusion on the sex offenders register or police investigations to the College at enrolment and throughout the duration of their course.

Having an unspent criminal conviction(s), caution, pending charges, inclusion on the sex offenders register or police investigations does not automatically exclude anyone from being a student at College. The admission of a student or a student continuing on a

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<sup>1</sup> An unspent conviction is a term from the British criminal justice system. When convicted of a crime in court, that conviction will be unspent for a certain period of time (called the rehabilitation period), meaning that **it remains against your personal record and must be declared whenever you are asked about criminal convictions**

course at college is, however, at the discretion of the College with due regard to the Safeguarding, Health, Safety, and Welfare of other members of the college community. In particular, there may be occasions where the nature of an applicant's criminal conviction poses a potential risk to the College community or makes them unsuitable for the chosen programme or to be in a college environment.

Some College Courses are exempt from the ROA and require full disclosure of spent criminal conviction(s), cautions, pending charges, inclusion on the sex offenders register or police investigations at the point of application. Potential students will be notified of the need to disclose information upon application for a Disclosure and Barring Check (DBS).

All information provided as part of this process will be considered objectively assessing any risk to etc. staff, students, visitors and clients.

Information provided will be treated as 'sensitive, confidential data' in line with College Policy and the General Data Protection Regulations (GDPR).

### **3. Disclosing Conviction(s) or Police Investigations**

#### **Students at application**

Students applying to courses at college must declare unspent criminal conviction(s), cautions, pending charges, inclusion on the sex offenders register or police investigations at enrolment.

#### **Current Students**

Students studying on a course are required to inform the Safeguarding Officer at their college location of any unspent criminal conviction(s), cautions, pending charges, inclusion on the sex offenders register or police investigations that have occurred since their start date.

#### **Declaration Form**

Once the unspent criminal conviction(s), cautions, pending charges, inclusion on the sex offenders register or police investigations is declared, an applicant or current student will be provided with a form to declare the nature of the offence or investigation. The form may be online as part of the application process, or a paper form given. Full details must be provided, including, dates of charges/allegations, conditions, probation officer/youth offending officer/social worker/investigating officer name and telephone numbers.

Advice can be given if applicants are unsure of information to include.  
NACRO 0300 123 1999 [helpline@nacro.org.uk](mailto:helpline@nacro.org.uk)

Paper declaration forms must be handed to the campus Safeguarding Officer within one working day of completion.



#### 4. **Failure to Disclose**

If a person applying to a programme fails to declare unspent criminal conviction(s), cautions, pending charges, inclusion on the sex offenders register or police investigations, the application may be considered 'fraudulent'.

Current students who fail to declare may be subject to disciplinary proceedings and may be withdrawn from their course.

#### 5. **Disclosure Levels**

Once the fully completed criminal disclosure form is received by the campus Safeguarding Officer, an initial review of content must take place within the same working day. The Campus Safeguarding Officer will review the disclosures and confirm with relevant probation officer/youth offending officer/social worker/investigating officer where appropriate that the details are correct.

The Campus Safeguarding Officer will assess the unspent criminal conviction(s), cautions, pending charges inclusion on the sex offenders register or police investigations and rate the offence as one of the following:

- **Low Risk**
- **Medium Risk**
- **High Risk**

Risk ratings are at the discretion of the College and made with due regard to the Safeguarding, Health and Safety and Welfare of other members of the college community.

The Designated Safeguarding Lead will be notified if a student is classed as medium or high risk the same working day. The Designated Safeguarding Lead (or designate) and the HOD will decide if suspension/delayed start date is required. The HOD will notify the student if suspension/delayed start is agreed.

##### **Low Risk**

The Campus Safeguarding Officer will review the initial declaration form and make the following recommendations:

- Approved and signed off, no risk assessment required
  - Approved, risk assessment required (unusual for low risk)
- The College Safeguarding Officer will share the declaration form and all details of their recommendations with the relevant Head of Department within 5 working days, who may:
  - Sign off and agree to the recommendations
  - Change the recommendation and sign off the form
  - Disagree with the outcome and convene a Criminal Disclosure Panel

### **Medium Risk or High Risk**

Where the Campus Safeguarding Officer and / or Designated Safeguarding Lead have rated the offences as Medium or High Risk, the HOD will be notified and a Criminal Disclosure Panel meeting will be convened. High risk criminal panel meetings will be convened within 48 hours.

### **5. Criminal Disclosure Panel**

The panel will consist of:

- Designated Safeguarding Lead (or nominee) (Chair)
- Head of Department / of the department where the student/potential student will be studying (HOD / Curriculum Manager are invited, however if unable to attend within the time frame, the panel meeting will still go ahead)
- Representatives from external partners e.g. Police, Probation, Youth Offending Team (if appropriate)

The Designated Safeguarding Lead will present the declaration, alerting the panel to any potential concerns they may have. During the meeting, the Admissions risk assessment form will be completed and signed by panel attendees.

The outcome of the meeting will be:

- Admit the applicant/continue on programme on the basis of the evidence presented
- Admit the applicant subject to agreed contract of conduct/other restrictions. (The student will be contacted by the curriculum team who will explain the details of the contract and the consequences of non-adherence. The student must sign the contract of conduct as a condition of being offered or maintaining a place at college).
- Admit the applicant with Careers guidance from Curriculum area (Secretariat inform Curriculum)
- Admit the applicant for this course only, future courses would require further consideration
- Recommend continued exclusion or non-admittance due to the risks presented to the institution Re: safeguarding. (Any student who is declined will be sent a letter advising that this is the case. Where a student is under the age of 18, parents/carers will also be informed in writing with appropriate consent. Where a student is currently working with the Youth Offending Team or the Probation Service, their assigned worker will be informed.)

Any decisions the college make to decline a learner can only be done on the basis where it is felt that the risks to the college community are too high.

### **6. Other Circumstances**

The College reserves the right to conduct a risk assessment on any applicant or any student at any time. This could include when an applicant has already been made an unconditional or conditional offer of a place on a course or when learners are already

on course. This may be in response to a range of circumstances including information on an EHCP, a Disclosure and Barring Service (DBS) certificate that was not disclosed at the application/enrolment stage and information received from social services, the police and other relevant agencies or organisations.

If the outcome is that an applicant is refused a place at the College, an offer of a place to an applicant is withdrawn or a learner on programme is withdrawn, the decision will be communicated in writing to the applicant or learner. This letter will be copied to the parent/carers for a learner under the age of 18, with appropriate consent.

## **7. Appeals**

Applicants who have been refused a place at the College or have had an offer of a place withdrawn and learners on programme who have been withdrawn due to a safeguarding risk assessment panel, may appeal against this decision. Appeals must be made in writing and must be received by the College within 15 working days of the date of the panel outcome letter.

The appeal should be sent to the Executive Team and Secretariat Manager Cath Turner at the main College address: Harvard Avenue, Thornaby, Stockton on Tees TS17 6FB or by email to [catherine.turner@the-etc.ac.uk](mailto:catherine.turner@the-etc.ac.uk). Appeals will be heard by a member of the Senior Management Team, usually the College Principal, who will consider each individual case and confirm their decision to the applicant or learner in writing.

For the purposes of this policy, an appeal is defined as a request for a formal review of the outcome of a safeguarding risk assessment panel. The appellant may appeal a decision regarding the outcome of the panel if they feel that the panel was not conducted in accordance with this policy or that the decision did not take account of the available evidence or was unreasonable, given the evidence available. In making an application for an appeal, the appellant must state on which of these grounds the appeal is being made.

## Appendix 1

### Guidance Notes for Students - Rehabilitation of Offenders Act 1974

The Rehabilitation of Offenders Act 1974 enables criminal convictions to become 'spent' or ignored after a specified 'rehabilitation period'. After this period, with certain exceptions, an ex-offender is not normally obliged to mention their conviction.

Students are not obliged to disclose Spent convictions if they are applying for or attend programmes that are not professionally validated programmes or do not require a DBS disclosure.

Full details of the rehabilitation of offenders act can be found here [Rehabilitation of Offender Act 1974](#)

<b>Sentence/disposal</b>	<b>Buffer period for adults (18 and over at the time of conviction or the time the disposal is administered). This applies from the <u>end date</u> of the sentence (including the licence period).</b>	<b>Buffer period for young people (under 18 at the time of conviction or the time the disposal is administered). This applies from the <u>end date</u> of the sentence (including the licence period).</b>
Custodial sentence* of over 4 years, or a public protection sentence	Never spent	Never spent
Custodial sentence of over 30 months (2 ½ years) and up to and including 48 months (4 years)	7 years	3½ years
Custodial sentence of over 6 months and up to and including 30 months (2 ½ years)	4 years	2 years
Custodial sentence of 6 months or less	2 years	18 months
Community order or youth rehabilitation order**	1 year	6 months

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

\*\*In relation to any community or youth rehabilitation order which has no specified end date, the rehabilitation period is 2 years from the date of conviction.

The following table sets out the rehabilitation period for sentences which do not have "buffer periods" and for which the rehabilitation period runs from the date of conviction:

<b>Sentence/disposal</b>	<b>Rehabilitation period for adults (18 and over at the time of conviction or the time the disposal is administered).</b>	<b>Rehabilitation period for young people (under 18 at the time of conviction or the time the disposal is administered).</b>
Fine	1 year	6 months
Conditional discharge,	Period of the order	Period of the order
Absolute discharge	None	None
Conditional caution and youth conditional caution	3 months or when the caution ceases to have effect if earlier	3 months
Simple caution, youth caution	Spent immediately	Spent immediately

Compensation order*	On the discharge of the order (i.e. when it is paid in full)	On the discharge of the order (i.e. when it is paid in full)
Binding over order	Period of the order	Period of the order
Attendance centre order	Period of the order	Period of the order
Hospital order (with or without a restriction order)	Period of the order	Period of the order
Referral order	Not available for adults	Period of the order
Reparation order	Not available for adults	None

**Important Note:** This is intended as general guidance only. It is not legal advice and must not be regarded as a definitive interpretation of the 1974 Act. Anyone in doubt should seek their own legal advice.

### College Arrangements for Safeguarding Training

#### 1. Purpose and content

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

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

Please note that the term 'College' is used throughout this appendix, as a generic term that encompasses all organisations within the wider College group; namely Stockton Riverside College, Redcar & Cleveland College, NETA Training Group and Tees Valley Catering.

### Disclosure and Barring Service Checks

#### 1. Purpose and content

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

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

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

#### 2. DBS checks

DBS checks enable organisations to make safer recruitment decisions by identifying those who may be unsuitable for work with children and/or vulnerable adults. The College deems itself to be a 'specified place' in line with the Department for Education (DfE) September 2020 statutory guidance; 'Keeping children safe in education' and as such the appointment of all College staff is subject to a satisfactory enhanced DBS check.

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

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

If the DBS disclosure certificate shows evidence that the individual is potentially a risk to children and/or vulnerable adults, the College reserves the right to withdraw any offer of employment/volunteering opportunity or an offer of a place on a course that requires the person to work with children and/or vulnerable adults. Decisions will be made in the light of the seriousness, date and circumstances relating to the offence/s.

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

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

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

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

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

### **3. External workers employed by other organisations**

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

### **4. Single Central Record**

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



A record of learner DBS checks is maintained separately and overseen by the College Designated Lead for safeguarding.

#### **5. Staff from outside the United Kingdom or who have worked abroad**

Prospective staff who have lived or worked overseas, (3 months +) within the last 10 years, may be subject to additional checks as considered appropriate. Such additional checks may include certificates of good conduct or checks of foreign police records. If these are unavailable (it is not possible to obtain these checks in every circumstance) the College will pursue other avenues such as additional references, so that safer recruitment is achieved. The College will also, where appropriate seek information from overseas teaching regulatory bodies to ascertain if any concerns have been raised against prospective teaching staff.

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

#### **6. People who do not require a Disclosure and Barring Service Check**

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

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

#### **7. Work experience placements – employer DBS checks**

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

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

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/534922/Post\\_16\\_work\\_experience\\_guidance.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/534922/Post_16_work_experience_guidance.pdf)

Keeping Children Safe in Education 2023 is below. The College will ensure that this guidance is followed.

330. Children's barred list checks via the DBS might be required on some people who supervise a child under the age of 16 on a work experience placement<sup>117</sup>. The school or college should consider the specific circumstances of the work experience. Consideration **must** be given in particular to the nature of the supervision and the frequency of the activity being supervised, to determine what, if any, checks are necessary.

331. These considerations would include whether the person providing the teaching/training/instruction/supervision to the child on work experience will be:

- unsupervised themselves, and
- providing the teaching/training/instruction frequently (more than three days in a 30-day period, or overnight).

332. If the person working with the child is unsupervised and the same person is in frequent contact with the child, the work is likely to be regulated activity relating to children. If so, the school or college could ask the employer providing the work experience to ensure that the person providing the instruction or training is not a barred person.

333. Schools and colleges are not able to request that an employer obtains an enhanced DBS check with children's barred list information for staff supervising children aged 16 to 17 on work experience<sup>118</sup>.

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Type of check	What the check involves	Positions eligible for this level of check
<b>Standard check</b>	Check of the Police National Computer records of convictions, cautions, reprimands and warnings.	The position being applied for must be covered by an exempted question in the Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975.
<b>Enhanced check</b>	Check of the Police National Computer records <b>plus</b> additional information held by police such as interviews and allegations. Additional information will only be disclosed where a chief police officer reasonably believes it to be relevant and considers that it ought to be disclosed.	The position being applied for must be covered by an exempted question in the Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975 and by provisions in the Police Act 1997 (Criminal Records) Regulations 2002.*
<b>Enhanced criminal record check with children's and/or adult's barred list information</b>	Check of the Police National Computer records <b>plus</b> additional information held by police <b>plus</b> check of the DBS Children's Barred List <b>plus</b> check of the DBS Adults' Barred List.	The position must be eligible for an enhanced level criminal record check as above and be for a purpose listed in the Police Act 1997 (Criminal Records) (No2) Regulations 2009 as qualifying for a barred list(s) check.

\*This legislation does not provide a list of job roles that are eligible for this check – such a list does not exist. Instead, the Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975 sets out the 'exempted questions' for which a standard check can be obtained. Similarly, the Police Act 1997 (Criminal Records) Regulations 2002 set out the purposes for which an enhanced check can be obtained, and the Police Act 1997 (Criminal Records) (No 2) Regulations 2009 list the circumstances in which an enhanced check will automatically include a barred list check. It is important to note that the Regulations can also remove roles, duties or activities through the removal of an exempted question or of a particular purpose. The Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975, the Police Act 1997 (Criminal Records) Regulations 2002 and the Police Act 1997 (Criminal Records) (No 2) Regulations 2009 can all be found on the [legislation website](#).

Any individual (including an applicant for a job which does not involve working with children) can be asked to apply for a basic criminal record check. This will show only unspent convictions and cautions. This service is currently provided via the Disclosure and Barring Service. Further details can be found on [gov.uk](#).

### Safer Recruitment of Staff and Volunteers

#### 1. Purpose and content

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

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

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

#### 2. Definitions

The key terms in this document are defined as:

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

#### 3. Relevant external guidance

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

- 'Keeping Children Safe in Education'; Department for Education, September 2023
  - 'An employer's guide to right to work checks'; Gov.uk, Jan 2019
- The Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975 (amendment) Order 2019

The College defines itself as a 'specified place' in accordance with the guidance outlined in 'Keeping Children Safe in Education' September 2023 and staff working within the College as in 'regulated activity' as their positions could involve regular contact with children under the

age of 18. Therefore the College is legally entitled to ask all applicants to disclose any convictions and cautions that are not protected under the Rehabilitation of Offenders Act (ROA) 1974 (Exceptions) Order 1975 (amendments) 2013 and 2020.

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

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

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

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

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

#### **4. College requirements**

In line with the GDPR, The College no longer requires all applicants to confirm on their application form whether or not they have any non-protected convictions and cautions.

Instead, shortlisted candidates are now required to complete a Criminal Record Self Disclosure form before attending for interview. If this is not received, the candidate will not be allowed to attend the interview. During the interview the recruiting manager will ensure that an open and measured discussion takes place on the subject of any offences or other matters that might be relevant to the position. Applicants are not protected by the Rehabilitation of Offenders Act 1974 if they fail to disclose relevant information and will be warned that failure to reveal information could lead to the withdrawal of an offer of employment or the termination of employment if an appointment has already taken place.

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

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

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

The table in section 19 shows the pre-employment checks that must be undertaken for different groups of staff and volunteers before they start work at the College. The relevant information, and the date of the check will be entered on the SCR and a copy of relevant documents (e.g. copies of photographic ID and qualifications) will be included on the individual's personnel file.

It is the responsibility of the recruiting manager to ensure that HR are aware of all planned appointments, including hourly paid staff, agency staff, placements and volunteers in

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

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

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

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

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

## **5. Deterring unsuitable applicants from applying or volunteering to work at the College**

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

- All advertisements for posts carrying an explicit safeguarding statement
- The College does not accept CVs. Candidates must fully complete an application form, accounting for any gaps in employment.
- The application form containing a statement stating the College's commitment to safeguarding and a requirement for the applicant to disclose all non-protected convictions, cautions and pending prosecutions prior to interview.

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

## **6. Shortlisting and interviews**

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

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

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

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

## **7. ID and right to work in the UK checks**

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

Right to work in the UK checks for applicants for staff posts will be conducted in accordance with Home Office guidance. Applicants will need to provide acceptable documents in line with the guidance to establish either a permanent or temporary right to work in the UK. For example a standard UK passport that confirms British citizenship establishes a permanent right to work in the UK. Documents will be checked in the presence of the applicant and an



endorsed dated copy of the relevant part/s of the document/s retained on the applicant's HR file.

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

## **8. Qualification checks**

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

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

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

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

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

- The DBS certificate must have been applied for
- A risk assessment must have been completed by the Head of Department prior to employment commencing and approved by the Group HR Director
- A separate barred list check has been completed
- The risk assessment will clearly state the agreed arrangements for supervision

- The DBS certificate must be received by HR within 10 working days of being dispatched by the DBS service. If this does not happen the employee will be contacted by the HR department and invited to an interview with the Group Director of HR and informed that the DBS certificate must be received by the HR Department on the next working day
- If the DBS certificate is not received within the allotted time, the employee will be informed by the Group Director of HR and his/her Head of Department that he/she will not be permitted to work in the College until the DBS certificate is received and deemed satisfactory
- The Head of Department must review and update the risk assessment on a two weekly basis until HR confirm the DBS certificate has been received.

## **10. References**

Two written references are required for all applicants. One reference should be from the current employer and the other from another appropriate person in their current or most recent post wherever possible.

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

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

Where an applicant is not currently working with children or vulnerable adults, but has done so in the past a reference may also be obtained from the employer by whom the person was most recently employed in relevant work.

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

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

- The written references must have been requested by HR
- At least one written reference and one verbal reference, from a valid source such as the current/previous employer, must have been obtained with a clear and dated record of this noted on the member of staff’s file in HR
- A risk assessment must have been completed by the Head of Department and approved by the Group HR Director

- 
- The risk assessment must be reviewed every two weeks until the written references are received with rigorous action taken to secure them
- If the references are not received within one calendar month HR will notify the Group Director of HR who will provide advice on further actions

### **11. Further checks for applicants who have lived or worked outside the UK**

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

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

### **12. Volunteers**

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

### **13. Agency staff / partner organisations**

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

The College also needs to assure itself that staff from organisations that legitimately require access to College learners have been subject to appropriate checks. This includes staff from partner organisations such as the NHS, social services, Youth Directions and employers of apprentices. A letter from an appropriate department within each organisation (e.g. HR) that identifies each member of staff and confirms that all appropriate checks have been completed must have been received and logged with HR by Student Services (for welfare related aspects) or the Head of the relevant department (for employers) before access is allowed.

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

#### **14. Visitors to the College**

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

#### **15. Online update DBS checking service**

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

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

#### **16. Secure storage, handling use, retention and disposal of DBS information**

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

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

#### **17. Receiving a criminal record/conviction whilst in employment at the College**

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

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

Receiving a criminal record, or being the subject of an ongoing investigation, whilst employed or placed at the College does not automatically mean that the member of staff or volunteer

cannot continue in their role. Where necessary, any action taken by the College will be in line with the relevant provisions within the College's Disciplinary policy and procedure.

### **18. Referral to other agencies**

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

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

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

### **19. Table showing the checks required for each category of staff/volunteer**

## The Etc. Group Recruitment Matrix

Individual Type	Definition	Interview Notes	Successful Candidate/HP Assignment Sheet	Volunteer Assignment Sheet	Placement Assignment Sheet	Self-Employed Candidates Form	Agency Non-Employee Details Form	Photographic ID	Right to Work (Passport)	Two References	Enhanced DBS	Barred List	Criminal Record Self-Disclosure	Application Form	Qualifications	Medical Fitness Declaration	New Starter Form (Payroll)	TRN Prohibition Check	IR35/Employment Status S05 Questionnaire	Online Candidate Checks	S128 Check	Overseas Check
Staff	Salaried and Hourly Paid Staff	✓	✓					✓	✓	✓	✓	✓	✓	✓	✓ (If applicable)	✓	✓	✓ (Anyone with a TRN)		✓	✓ (Budget Holders Only)	✓
Volunteers	An individual who works for the organisation without being paid	✓		✓				✓		✓	✓	✓	✓	✓				✓ (Anyone with a TRN)		✓		✓
Placements	A trainee teacher from an education establishment				✓			✓	✓	✓	✓	✓								✓		✓
Self Employed Contractor	Individuals who work as a sole trader or via their own limited company and submit invoices					✓		✓	✓	✓	✓	✓	✓		✓ (If applicable)			✓ (Anyone with a TRN)	✓	✓		✓
Agency Staff	Staff employed via an agency/other company and submit invoices						✓	✓	✓	✓	✓	✓			✓ (If applicable)			✓ (Anyone with a TRN)	✓	✓	✓ (Budget Holders Only)	✓
Third Parties/Sub-Contractors	Individuals who are employed by an outside company who provide service to Etc							✓ (Viewed only - No copy kept - Only logged on SCR)			✓	✓										
Governors	Individuals responsible for overseeing the management of the Group							✓ (Sarah Thompson)	✓ (Sarah Thompson)	✓ (Sarah Thompson)	✓	✓	✓ (Sarah Thompson)	✓ (Sarah Thompson)						✓	✓	

Written Confirmation  
Only Required

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



# Policy Statement:

## Staff Code of Conduct

Date approved:	20 June 2023		Review Date:	June 2024	
Approved by:	Finance and Employment Committee				
Relevant to (please ✓):	<input checked="" type="checkbox"/> Vocational	<input checked="" type="checkbox"/> A Level	<input checked="" type="checkbox"/> HE	<input checked="" type="checkbox"/> NETA	<input checked="" type="checkbox"/> WBL
Signed (Lead Manager):	Kay Taylor				
Print Name:	KAY TAYLOR				

## **1 PURPOSE**

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

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

## **2 SCOPE**

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

## **3 STATEMENT OF ACTION**

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

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

## **4 LINKED POLICIES**

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

## **5 LOCATION AND ACCESS**

The Group Gateway site – Human Resources Policies and Procedures





education  
training  
collective

# **Procedure:**

## **Staff Code of Conduct**

## **1.0 Purpose**

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

## **2.0 Scope**

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

## **3.0 References and Related Documentation**

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

## **4.0 Professional boundaries / working with students**

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

else posts to your social media handles, you are responsible for this content, therefore privacy settings should be considered.

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

## **5.0 Additional professional responsibilities**

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

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

## **6.0 Gifts and Hospitality**

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

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

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

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

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

## **7.0 Bribes and inducements**

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

## **8.0 Working with Colleagues**

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

## **9.0 Professional Prejudice**

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

## **10.0 Representing The Group**

- 10.1 In order to preserve the reputation of The Group, staff must:

- Check with the relevant budget holder before committing resources other than those for which they have responsibility
- Take care over the use of Group/College headed notepaper and logo's, whether for use themselves or the use of learners they are supervising; in particular ensure that written communication they are sending outside The Group is in line with agreed branding standards which are available on the Gateway. In the event of any concern, seek assistance from a member of the Secretariat team
- Maintain professional standards of conduct at all times towards others when acting in a Group capacity
- Dress appropriately when acting in a professional capacity
- Not engage in activity that would bring The Group into disrepute
- Use appropriate language at all times

## **11.0 Group Property**

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

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

### Allegations and Whistleblowing (Safeguarding)

#### 1. Purpose and content

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

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

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

#### 2. Definitions

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

#### 3. Taking safeguarding seriously

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

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

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

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

- Principal Grant Glendenning
- Designated Safeguarding Lead Sue Everton
- Any member of the College Senior Leadership Team

Concerns about staff may be because:

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

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

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

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

#### **5. Whistleblowing**

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

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

- Email – [sarah.thompson@stockton.ac.uk](mailto:sarah.thompson@stockton.ac.uk)
- Telephone – 01642 865415

If the situation is not rapidly resolved follow the guidance available via the link on page 9 of the Department for Education (DfE) September 2023: Keeping children safe in education;

statutory guidance for schools and colleges. This document is available on the staff gateway on the home page of the College Safeguarding (including Prevent) site.

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

- general guidance on whistleblowing can be found via: [Advice on Whistleblowing](#); and
- the [NSPCC's what you can do to report abuse](#) dedicated helpline is available as an alternative route for staff who do not feel able to raise concerns regarding child protection failures internally or have concerns about the way a concern is being handled by their school or college. Staff can call 0800 028 0285 – line is available from 8:00 AM to 8:00 PM, Monday to Friday and email: [help@nspcc.org.uk](mailto:help@nspcc.org.uk).

## 6. College duty of care to staff

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

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

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