

Safeguarding Policy

Children/Young People, Apprentices & Adults at Risk

Issue 3

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TO BE A BEACON OF **EDUCATIONAL EXCELLENCE**,
TRANSFORMING THE LIVES OF THE **INDIVIDUALS**
AND **COMMUNITIES** WE SERVE.

SCC Group Safeguarding Children and Adults At Risk

1 Introduction

The college has a statutory and moral duty to ensure that it safeguards and promotes the welfare of all its learners specifically ensuring it protects those who are suffering or are likely to suffer significant harm. This policy has been developed to address the legal duties set out in: 'Working Together to Safeguard Children 2018' "Keeping Children Safe in Education 2023" and the "Care Act 2014".

College staff are required to do all that is reasonable to protect the health, safety and welfare of learners. These legal responsibilities derive from three sources:

- Common law duty of care (in loco parentis)
- Statutory duty of care
- Duty arising from the contract of employment

In relation to **children/young people/young apprentices**, our policy adopts the definition of safeguarding used in the Department for Education guidance "Keeping Children Safe in Education, updated September 2023":

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

"Children" as defined in the Children Acts of 1989 and 2004 is **"any person who has not reached their 18th birthday"**

The legal framework for responding to concerns regarding the safeguarding and welfare of adults at risk is different from that of children/young people. In relation to **adults at risk and adults at risk apprentices**, our policy adopts the definition used in the "Care Act 2014":

The Care Act came into force in May 2014. Sections 42-46 relate to Safeguarding Adults, it extended the definition of an adult at risk for safeguarding purposes from someone 'who is or may be in need of community care services' to an adult who:

- 'Has needs for care and support (whether or not the local authority is meeting any of those needs);
- 'Is experiencing, or is at risk of, abuse or neglect; and
- 'As a result of those needs is unable to protect themselves from either the risk of, or the experience of abuse or neglect.'

Everyone who comes into contact with children/young people, adults at risk and their families has a role to play in safeguarding and understand their role and responsibilities to provide a safe environment. College staff are particularly important as they are in a position to identify concerns early and provide help in order to prevent concerns from escalating. Schools and colleges and their

staff form part of the wider safeguarding system for children. As a college, we are committed to working with social care, the police, health services and other services to promote the welfare of our learners and protect them from harm.

We are proud to foster an ethos throughout our organisation of “Safeguarding is everyone’s responsibility”. We are committed to creating a culture of listening to and engaging in dialogue with learners in a manner appropriate to their age, understanding and individual needs. All staff should be able to reassure victims that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

2 Objectives

- Ensure we have a clear commitment to safeguarding and promoting the welfare of our learners and apprentices by complying with our legal duty in addition to a “duty of care” to all learners
- Contribute to inter-agency working in line with statutory guidance and provide a “co-ordinated” offer of early help where needs are identified
- Ensure that our safeguarding arrangements take into account the procedures and practices set up by local safeguarding boards
- Ensure that a member of the governing body/link governor is nominated to liaise with the local authority and/or partner agencies on issues of child protection/safeguarding adults at risk and in the event of allegations being made against the principal
- Provide appropriate training in relation to safeguarding procedures ensuring that all staff are aware of their safeguarding responsibilities and duty to report concerns
- To nominate a senior lead with responsibility for safeguarding with operational responsibility overseen by the Safeguarding Managers
- Make the appropriate referrals in the event that there is **a risk of immediate or serious harm**
- Ensure that the Safeguarding Manager and Safeguarding Team undergo updated child protection training every two years in line with advice from the local safeguarding board
- Make effective provision to teach children/young people/ adults at risk about safeguarding and promote ways in which they might access help and support
- Filtering and monitoring
- Prevent
- Ensure the safe recruitment of all staff working with learners across the organisation
- Ensure that there is a robust and transparent system in place to manage allegations against staff members and/or other learners, specifically making referrals to the LADO/DBS
- Ensure the learner’s wishes or feelings are taken into account when determining what action to take and what services to provide to protect individuals. In doing this however, we will also ensure that staff members do not promise confidentiality and always act in the interests of the learner.
- Ensure that we promote the education and achievement of children/young people who are cared for by the local authority
- Ensure a dedicated Apprenticeship Safeguarding Officer is in place

3. The role of college and apprenticeship staff

- All staff members have a responsibility to provide a safe environment in which all our learners can learn.
- All staff members have a responsibility to identify children/young people/adults at risk who may be in need of extra help or who are suffering, or are likely to suffer, significant harm. All

staff then have a responsibility to take appropriate action, working with other services as needed.

- In addition to working with the designated Safeguarding Team, staff members are aware that they may be asked to support other agencies in making decisions about promoting the welfare of the individual concerned
- All staff members have a responsibility to identify emerging concerns and provide early intervention with support from the safeguarding team.

4. What college and apprenticeship staff need to know

- All staff members are made aware of systems within the college which support safeguarding and these are explained to them as part of staff induction, where they undertake their 'Introduction to Safeguarding' training course. This training specifically includes: the college's Code of Conduct policy for staff, this Safeguarding Policy and the latest Keeping Children Safe in Education document.
- Staff are then required to complete the 'Advanced Safeguarding' Course within 12 months of the commencement of their employment.
- Staff members receive subsequent safeguarding training which is regularly updated. Our Safeguarding introduction training provides specific detail about types of abuse/case studies and how and when to report concerns to the Safeguarding Team.
- All staff should be aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. For example, children may feel embarrassed, humiliated, or being threatened. This could be due to their vulnerability, disability and/or sexual orientation or language barriers. This should not prevent staff from having a professional curiosity and speaking to the DSL if they have concerns about a child. It is also important that staff determine how best to build trusted relationships with children and young people which facilitate communication.
- It is important that schools and colleges recognise that not everyone who has been subjected to abuse considers themselves a victim or would want to be described in this way. Ultimately, schools and colleges should be conscious of this when managing any incident and be prepared to use any term with which the individual child is most comfortable
- Alleged perpetrator(s) and where appropriate perpetrator(s) are widely used and recognised terms. However, staff should think very carefully about terminology, especially when speaking in front of learners, because in some cases the abusive behaviour will have been harmful to the perpetrator as well
- All staff should be aware of their local early help process and understand their role in it.
- All staff should be familiar with the safeguarding implication of a learner who is absent from education and refer to the attendance policy as appropriate.

5. What college and apprenticeship staff should look out for

- Staff members are made aware of the signs of abuse and neglect so that they are able to identify cases of children/young people/ adults at risk who may be in need of help or protection
- Staff members working with children/young people/adults at risk are advised to maintain an attitude of 'it could happen here' where safeguarding is concerned
- There are various expert sources of advice on the signs of abuse and neglect. Our Local Safeguarding Boards can advise on useful material, another good source of advice is provided on the NSPCC website. Types of abuse and neglect, and examples of specific safeguarding issues, are described on pages six and seven of this policy

- Knowing what to look for is vital to the early identification of abuse and neglect. If staff members are unsure they should always speak to a member of the Safeguarding Team who can contact adult or children's social care where appropriate
- A child (if under 18) absent from an education setting is a potential indicator of abuse or neglect. College staff should act to identify any risk of abuse and neglect, including sexual abuse or exploitation and immediately notify the Safeguarding Team.

6. What all college staff should do if they have concerns about a child/young person, apprentice or adult at risk

Staff working with children are advised to maintain an attitude of 'it could happen here' where safeguarding is concerned. When concerned about the welfare of a child, staff should always act in the best interests of the child. If staff members have concerns about a learner they should raise these with the most immediate member of the **college's designated safeguarding team**. This will usually be the Head of Pastoral Studies responsible for the welfare of that particular learner. Details of team members are on notice boards across the college and include details of whom to contact in an emergency/out of hours. Also on this page is a list of "Useful Safeguarding Contact Numbers".

The safeguarding team member will usually decide whether to make a referral to children's or adult social care in the relevant local authority area. It is important to note however: any staff member or member of the public can refer their concerns directly using the local authority referral process or seek advice from the NSPCC. However, we would only expect this to occur in exceptional circumstances or where a member of the safeguarding team is not available.

Where a child/young person/adult at risk and family would benefit from co-ordinated support from more than one agency (for example education, health, housing, police) the college will work with other agencies. This should identify what help that individual and family require to prevent needs escalating to a point where intervention would be needed via a statutory assessment.

If, at any point, there is a risk of immediate serious harm to a child/young person/adult at risk a referral should be made to social care immediately and/or contact made with the police.

It is important that learners at risk receive the right help at the right time to address risks and prevent issues escalating. Research and Serious Case Reviews have repeatedly shown the dangers of failing to take effective action.

In all cases, if staff are unsure, they should always speak to the designated safeguarding lead or any member of the safeguarding team.

See referral flow chart below: a similar process applies where adults at risk are concerned however the referral would be made via adult services.

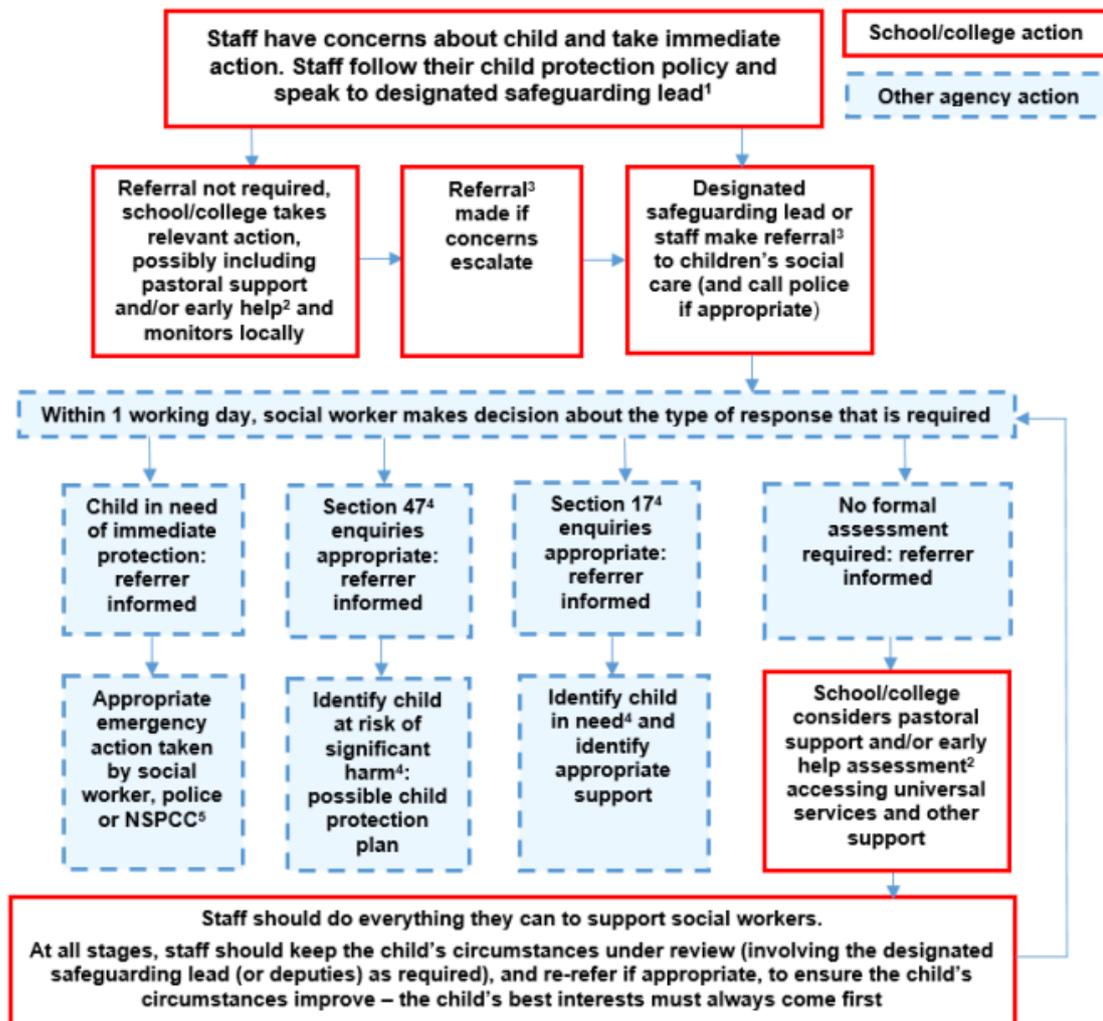
Please note the reference to "safeguarding lead" in this diagram refers to the appropriate "safeguarding team member" in the context of SCC Group

The Use of 'Reasonable Force'

There are circumstances when it is appropriate for staff in colleges to use 'reasonable force' to safeguard children. The term 'reasonable force' covers the broad range of actions used by staff that involve a degree of physical contact to control or restrain learners. This can range from guiding a learner to safety by the arm, to more extreme circumstances such as breaking up a fight or where a learner needs to be restrained to prevent violence or injury. 'Reasonable' in these circumstances means 'using no more force than is needed'. The use of force may involve either passive physical contact, such as standing between pupils or blocking a pupil's path, or active physical contact such

as leading a pupil by the arm out of the classroom. The decision on whether or not to use 'reasonable force' to control or restrain a child is down to the professional judgement of the staff concerned within the context of the law and should always depend on individual circumstances

Actions where there are concerns about a child



7. Early Help

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

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

alcohol misuse, adult mental health issues and domestic abuse

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

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-nude 12 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 school or college and online. All staff should be clear as to the school or college's policy and procedures with regard to child-on-child abuse and the important role they have to play in preventing it and responding where they believe a child may be at risk from it. All staff should understand that even if there are no reports in their schools or colleges it does not mean it is not happening, it may be the case that it is just not being reported. As such it is important if staff have any concerns regarding child-on-child abuse they should speak to their designated safeguarding lead (or a deputy). 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 for children and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it.

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 videos¹¹ (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 CCE and CSE 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. Children can become trapped by this type of exploitation, as perpetrators can threaten victims (and their families) with violence or entrap and coerce them into debt. 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. 39. 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 non-penetrative acts such as masturbation, kissing, rubbing, and touching outside clothing. It may include non contact 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 do not realise they are being exploited and may believe they are in a genuine romantic relationship.

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, wellbeing, 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 teachers¹³. 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 to follow their school or college's child protection policy, and by 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 educational 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.

In relation to adults at risk and adults at risk apprentices the Care Act also specifies:

“Abuse” includes financial abuse; and for that purpose “financial abuse” includes:

having money or other property stolen, being defrauded, being put under pressure in relation to money or other property, and having money or other property misused.

Other Safeguarding Issues

Expert and professional organisations are best placed to provide up-to-date guidance and practical support on specific safeguarding issues. For example NSPCC offers information for schools and colleges on its website www.nspcc.org.uk. Schools and colleges can also access broad government guidance on the issues listed below via the GOV.UK website:

- bullying including cyberbullying
- county lines
- domestic violence
- drugs
- fabricated or induced illness
- faith abuse
- forced marriage
- gangs and youth violence
- gender-based violence/violence against women and girls (VAWG)
- private fostering

- sexting
- teenage relationship abuse
- trafficking

Children who are LGBTQIA+

The fact that a child or a young person may be LGBTQIA+ is not in itself an inherent risk factor for harm. However, children who are LGBTQIA+ can be targeted by other children. In some cases, a child who is perceived by other children to be LGBTQIA+ (whether they are or not) can be just as vulnerable as children who identify as LGBTQIA+. Risks can be compounded where children who are LGBTQIA+ lack a trusted adult with whom they can be open. It is therefore vital that staff endeavour to reduce the additional barriers faced and provide a safe space for them to speak out or share their concerns with members of staff.

Children with special educational needs and disabilities or health issues

Children with special educational needs or disabilities (SEND) or certain medical or physical health conditions can face additional safeguarding challenges both online and offline. Governing bodies and proprietors should ensure their child protection policy reflects the fact that additional barriers can exist when recognising abuse and neglect in this group of children. These can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration
- these children being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children
- the potential for children with SEND or 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 challenges
- cognitive understanding – being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in schools or colleges or the consequences of doing so.

Any reports of abuse involving children with SEND will therefore require close liaison with the designated safeguarding lead (or deputy) and the named person with oversight for SEND in a college.

Radicalisation

Children may be susceptible to extremist ideology and radicalisation. Similar to protecting children from other forms of harms and abuse, protecting children from this risk should be a part of a schools or colleges safeguarding approach.

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.

Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.

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.

Although there is no single way of identifying whether a child is likely to be susceptible to an extremist ideology, there are possible indicators that should be taken into consideration alongside other factors and contexts. Background factors combined with specific influences such as family and friends may contribute to a child's vulnerability. Similarly, radicalisation can occur through many

different methods (such as social media or the internet) and settings (such as within the home). However, it is possible to protect people from extremist ideologies and intervene to prevent those at risk of radicalisation being drawn to terrorism. As with other safeguarding risks, staff should be alert to changes in children's behaviour, which could indicate that they may be in need of help or protection. Staff should use their judgement in identifying children who might be at risk of radicalisation and act proportionately which may include the designated safeguarding lead (or deputy) making a Prevent referral. Although not a cause for concern on their own, possible indicators when taken into consideration alongside other factors or context may be a sign of being radicalised.

The Prevent duty

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

The school or college's designated safeguarding lead (and any deputies) should be aware of local procedures for making a Prevent referral

8. On-line Safety

It is essential that children are safeguarded from potentially harmful and inappropriate online material. An effective whole college approach to online safety empowers a college to protect and educate learners, and staff in their use of technology and establishes mechanisms to identify, intervene in, and escalate any concerns where appropriate. The breadth of issues classified within online safety is considerable and ever evolving, but can be categorised into four areas of risk:

- **content:** being exposed to illegal, inappropriate, or harmful content, for example: pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation, and extremism.
- **contact:** being subjected to harmful online interaction with other users; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.
- **conduct:** online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images (e.g. consensual and 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

Governing bodies and proprietors should ensure online safety is a running and interrelated theme whilst devising and implementing their whole college approach to safeguarding and related policies and procedures. This will include considering how online safety is reflected as required in all relevant policies and considering online safety whilst planning the curriculum, any teacher training, the role and responsibilities of the designated safeguarding lead (and deputies) and any parental engagement.

Filtering and Monitoring

Whilst considering their responsibility to safeguard and promote the welfare of children and provide them with a safe environment in which to learn, governing bodies and proprietors should be doing all that they reasonably can to limit children's exposure to the above risks from the college's IT system. As part of this process, governing bodies and proprietors should ensure their school or college has appropriate filtering and monitoring systems in place and regularly review their effectiveness. They should ensure that the leadership team and relevant staff have an awareness and understanding of the provisions in place and manage them effectively and know how to escalate concerns when identified. Governing bodies and proprietors should consider the number of and age

range of their children, those who are potentially at greater risk of harm and how often they access the IT system along with the proportionality of costs versus safeguarding risks. The appropriateness of any filtering and monitoring systems are a matter for individual schools and colleges and will be informed in part, by the risk assessment required by the Prevent Duty.

The College will:

- identify and assign roles and responsibilities to manage filtering and monitoring systems
- 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.

9. Local Partnerships and information sharing

- A college representative is a member of both the Local Safeguarding Children and Adult Board. As a college, SCC follows working practices/guidance agreed by the local Children and Adult Safeguarding Boards.
- The college has working partnerships with the police both in Salford and Greater Manchester through our Safeguarding and Wellbeing & Health and Safety groups. Community Police Officers regularly attend college and are well known to staff and learners and apprentices.
- The College also works with local schools and the local authority and supports transition arrangements for vulnerable learners as they come to college or take up an apprenticeship.
- The college has a commitment to inter-agency working and the sharing of information in accordance with the principles outlined in government guidance: Information Sharing 2018. We have regard for the sharing of information to be “necessary, proportionate, relevant, adequate, accurate, timely and secure”
- The college has procedures in place to refer to the Local Authority Designated Officer (LADO) in the event that there is an allegation made against a staff member
- The college has a “joint protocol” with Salford Next Steps (Leaving Care Service) to promote the educational achievement of children who are cared for.
- Information sharing is vital in identifying and tackling all forms of abuse and neglect, and in promoting children’s welfare, including their educational outcomes. Schools and colleges have clear powers to share, hold and use information for these purposes
- School and college staff should be proactive in sharing information as early as possible to help identify, assess and respond to risks or concerns about the safety and welfare of children, whether this is when problems are first emerging, or where a child is already known to local authority children’s social care.
- Where learners leave the college (including in year transfers) the designated safeguarding lead should ensure their child protection file is transferred to the new school or college as soon as possible, and within 5 days for an in-year transfer or within the first 5 days of the start of a new term.
- It is important that governing bodies and proprietors are aware that among other obligations, the Data Protection Act 2018, and the UK General Data Protection Regulation (UK GDPR) place duties on organisations and individuals to process personal information fairly and lawfully and to keep the information they hold safe and secure.
- Governing bodies and proprietors should ensure relevant staff have due regard to the relevant data protection principles, which allow them to share (and withhold) personal information, as provided for in the Data Protection Act 2018 and the UK GDPR. This includes:

- being confident of the processing conditions which allow them to store and share information for safeguarding purposes, including information, which is sensitive and personal, and should be treated as 'special category personal data'
 - understanding that 'safeguarding of children and individuals at risk' is a processing condition that allows practitioners to share special category personal data. This includes allowing practitioners to share information without consent where there is good reason to do so, and that the sharing of information will enhance the safeguarding of a child in a timely manner. It would be legitimate to share information without consent where: it is not possible to gain consent; it cannot be reasonably expected that a practitioner gains consent; and, if to gain consent would place a child at risk, and
 - for schools, not providing pupils' personal data where the serious harm test under the legislation is met.³⁴ For example, in a situation where a child is in a refuge or another form of emergency accommodation, and the serious harm test is met, they must withhold providing the data in compliance with schools' obligations under the Data Protection Act 2018 and the UK GDPR. Where in doubt schools should seek independent legal advice.
- Parents/carers do not have an automatic right to access a learner's educational record. We deal with this through consent. We ask learners to provide us with contact details of parents /carers and staff must check that the person requesting information is on the contact list. Security questions must be asked, using information provided on the college system, to ascertain the identity of the person making the request before any information is shared. If in doubt, the request should be referred to the safeguarding team.
 - **The Data Protection Act 2018 and UK GDPR do not prevent the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children.**

11. Use of college premises for non college activities

Where governing bodies or proprietors hire or rent out school or college facilities/premises to organisations or individuals (for example to community groups, sports associations, and service providers to run community or extra-curricular activities) they should ensure that appropriate arrangements are in place to keep children safe.

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

10. Safer Recruitment

It is vital that the college creates a culture of safe recruitment and, as part of that, adopt recruitment procedures that help deter, reject or identify people who might abuse children. As such, all recruitment and appointment processes and practices at the College are carried out in accordance with Part 3 of the Keeping Children Safe in Education 2023.

An offer of appointment to a successful candidate, including one who has lived or worked abroad, is conditional upon satisfactory completion of relevant pre-employment checks including overseas' checks where appropriate. The level of DBS check required, and whether a prohibition check is required, will depend on the role and duties of an applicant to work in the college.

DBS Checks:

For appropriate appointments, an enhanced DBS check with barred list information is obtained as the majority of staff will be engaging in regulated activity. The definition of "regulated activity" can be found in the Keeping Children Safe in Education 2023 Guidance. The same approach is applied to volunteers, visitors (if unsupervised), governors, contractors and work placement officers depending on "regulated activity".

All applicants are required to have had a DBS check before they take up post or as soon as practicable afterwards. Alternatively, if the applicant has subscribed to it and gives permission, the college may undertake an online update check through the DBS Update Service. If the college allows an individual to start work in regulated activity before the DBS certificate is available then we will carry out a risk assessment to ensure that the individual is appropriately supervised and that all other checks, including a separate barred list check, have been completed satisfactorily.

Teacher Prohibition Checks:

In addition to the DBS checks described, anyone who is appointed to carry out teaching work will require an additional check to ensure they are not prohibited from teaching.

Single central record: The college keeps a single central record covering the following people:

- all staff (including supply staff) who work at the college, this means those providing education to children;
- all others who work in regular contact with children in the college, including volunteers and contracted staff.

The information recorded on these individuals is whether or not the relevant checks have been carried out or certificates obtained, and the date on which the checks were completed.

For Individuals who have lived or worked outside the UK the college will implement the same checks as all other staff in college. In addition, where appropriate overseas criminal records checks may be made so that any relevant events that occurred outside the UK can be considered.

For agency and third-party staff, the college will obtain confirmation that the relevant checks have been carried out and similarly with trainee teacher's if they are not salaried by the college.

If the college has concerns about an existing staff member's suitability to work with children, we will carry out all relevant checks as if the person were a new member of staff. Similarly, if a person working at the college moves from a post that was not regulated activity, into work which is regulated activity, the relevant checks for the regulated activity must be carried out.

Online Checks:

Applicants will be informed that as part of the shortlisting process, line managers will consider carrying out an online search as part of their due diligence on the shortlisted candidates. This may help identify any incidents or issues that have happened, and are publicly available online, which the college might want to explore with the applicant at interview. Online checks will be carried out on appointed candidates prior to confirming the offer.

11. Allegations of Abuse made against teachers and other staff

The college uses the guidance from "Keeping Children Safe in Education 2023" in respect of all cases in which it is alleged that a teacher or member of staff (including volunteers, agency staff and contractors) has:

- behaved in a way that has harmed a child, or may have harmed a child and/or;
- possibly committed a criminal offence against or related to a child and/or;
- behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children; and/or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children

The guidance relates to members of staff who are currently working at the college regardless of whether the college is where the alleged abuse took place or how small the allegation may be. This guidance should be read in conjunction with the College's Disciplinary Procedure. Where appropriate, allegations against a teacher who is no longer teaching at the College are referred to the police.

The following definitions are used when determining the outcome of allegation investigations:

- **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 to prove or disprove the allegation. The term, therefore, does not imply guilt or innocence.
- **Unfounded:** to reflect cases where there is no evidence or proper basis which supports the allegation being made.

Initial considerations

Many cases may well either not meet the criteria set out above, or may do so without warranting consideration of either a police investigation or enquiries by local authority children's social care services. In these cases, local arrangements are followed to resolve these low-level cases without delay.

Some allegations will be so serious they require immediate intervention by children's social care services and/or police. The Local Authority Designated Officer (LADO) is informed of all allegations that come to a college's attention and appear to meet the criteria so they can consult police and children's social care services as appropriate. This includes allegations against ex-members of staff.

If a member of college staff has a concern (even a low-level concern) that a person may have behaved inappropriately (including another member of college staff) they should:

- Report this directly to their Centre Principal and the Safeguarding Lead
- Make a written record of their concerns, observations or the information received
- Maintain confidentiality and guard against publicity while an allegation is being considered or investigated
- Give consideration to the college's Whistleblowing Policy where applicable

They should not:

- Keep the concern to themselves, promise confidentiality or attempt to deal with the situation themselves
- Make assumptions, offer alternative explanations or diminish the seriousness of the behaviour or incident
- Discuss the allegation/incident with colleagues other than the Centre Principal /Safeguarding Lead
- Take any action that might undermine any future investigation or disciplinary procedure, such as interviewing the alleged victim(s) or potential witness(es), or inform the alleged perpetrator or parents/carers

All staff and volunteers should feel able to raise any concerns about poor or unsafe practice and potential failures in the college's Safeguarding practice. They should feel able to raise concerns with the Senior Leadership Team. If staff need further advice regarding a concern about Safeguarding practice they can also seek support from the NSPCC whistleblowing helpline: 0800 028 0285 or help@nspcc.org.uk

The Centre Principal must immediately be informed of any allegation (even low-level concerns) regarding a staff member. If there is any indication, however small that the staff member has behaved in any of the ways described overleaf the Centre Principal must immediately inform HR who will in the first instance consult the LADO.

Initial LADO Discussion:

The purpose of an initial discussion is for the LADO and HR to consider the nature, content and context of the allegation and agree a course of action. The Safeguarding Lead will provide support if required at this point to help determine the level of risk in child protection terms. The LADO may ask for relevant additional information, such as previous history, whether the child or their family have made similar allegations previously and the individual's current contact with children/young people.

There may be situations when HR / Centre Principal will want to involve the police immediately, for example if the person is deemed to be an immediate risk to children/young people or there is evidence of a possible criminal offence. Where there is no such evidence, HR should discuss the allegations with the LADO in order to help determine whether police involvement is necessary.

No Further Action:

The initial sharing of information and evaluation may lead to a decision that no further action is to be taken in regard to the individual facing the allegation or concern; in which case this decision and a justification for it should be recorded by both HR and the LADO, and agreement reached on what information should be put in writing to the individual concerned and by whom. HR should then consider with the LADO what action should follow both in respect of the individual and consult with the Centre Principal, as case manager, in regards to those who made the initial allegation.

Strategy Meeting:

If there is cause to suspect a child is suffering or is likely to suffer significant harm, a strategy discussion would be convened in accordance with *Working Together to Safeguard Children*. In a strategy discussion or the initial evaluation of the case, the agencies involved will share all relevant information they have about the person who is the subject of the allegation, and about the alleged victim.

Disciplinary Procedure:

If the matter requires investigation via the College's Disciplinary Procedure, HR in conjunction with the Centre Principal will inform the employee facing the allegation as soon as possible after consulting the LADO. The college will consider carefully whether the circumstances of a case warrant a person being suspended from contact with children in their role or whether alternative arrangements can be put in place until the allegation or concern is resolved / investigated in line with the College's Disciplinary Procedure. All options to avoid suspension will be considered prior to taking that step (see further information on suspension which follows below).

Confidentiality

When an allegation is made, the college will make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered. The Education Act 2011 introduced reporting restrictions preventing the publication of any material that may lead to the identification of a teacher who has been accused by, or on behalf of, a pupil from the same school or college (where that identification would identify the teacher as the subject of the allegation). The reporting restrictions apply until the point that the accused person is charged with an offence, or until the Secretary of State or the General Teaching Council publishes information about an investigation or decision in a disciplinary case arising from the allegation. The reporting restrictions also cease to apply if the individual to whom the restrictions apply effectively waives their right to anonymity by going public themselves or by giving their written consent for another to do so or if a judge lifts restrictions in response to a request to do so. The provisions commenced on 1 October 2012.

HR will take advice from the LADO, police and children's social care services and consult with the Centre Principal to agree the following:

- who needs to know and, importantly, exactly what information can be shared;
- how to manage speculation, leaks and gossip;
- what, if any information can be reasonably given to the wider community to reduce speculation; and
- how to manage press interest if and when it should arise.

Suspension

The possible risk of harm to children/young people posed by an accused person will be evaluated and managed in respect of the child(ren) involved in the allegations. Suspension is not an automatic response when an allegation is reported; all options to avoid suspension will be considered prior to

taking that step. If HR in consultation with the Centre Principal /Safeguarding Lead is concerned about the welfare of other children in the community or the teacher's family, those concerns should be reported to the LADO or police.

In cases where the college is made aware that the Secretary of State has made an interim prohibition order in respect of an individual at the school or college it will be necessary to immediately suspend that person from teaching pending the findings of the Teaching Regulation Agency (TRA) investigation.

Resignations

If the accused person wishes to resign, or ceases to provide their services, this should not prevent an allegation being followed up in accordance with this guidance. Any investigation regarding Safeguarding will be concluded regardless of whether the employee/worker resigns from their role or not. **A referral to the DBS *must* be made, if the criteria are met.**

It is important that every effort is made to reach a conclusion in all cases of allegations bearing on the safety or welfare of children/young people, including any in which the person concerned refuses to cooperate with the process. Wherever possible the accused should be given a full opportunity to answer the allegation and make representations about it.

Following a criminal investigation or a prosecution

The police will inform the employer and LADO immediately when a criminal investigation and any subsequent trial is complete, or if it is decided to close an investigation without charge, or not to continue to prosecute the case after person has been charged. In those circumstances the LADO should discuss with HR whether any further action, including disciplinary action, is appropriate and, if so, how to proceed. The information provided by the police and/or children's social care services should inform that decision. The options will depend on the circumstances of the case and the consideration will need to take into account the result of the police investigation or the trial, as well as the different standard of proof required in disciplinary and criminal proceedings.

On conclusion of a Disciplinary Process:

If the allegation is substantiated and the person is dismissed or the college ceases to use the person's services, or the person resigns or otherwise ceases to provide his or her services, the LADO should discuss with HR whether the college will decide to make a referral to the DBS for consideration of inclusion on the barred lists is required and in the case of a member of teaching staff whether to refer the matter to the Teaching Regulation Agency (TRA) to consider prohibiting the individual from teaching.

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 if there is reason to believe the member of staff has committed one of a number of listed offences, and who has been removed from working (paid or unpaid) in regulated activity, or would have been removed had they not left. The DBS will consider whether to bar the person. A referral would be made as soon as possible after the resignation or removal of the individual.

Where it is decided on the conclusion of a case that a person who has been suspended can return to work, HR / Centre Principal will consider how best to facilitate that. Consideration will also be

given to the person's contact with the child/young person or children/young people who made the allegation.

In respect of malicious or unsubstantiated allegations: If an allegation is determined to be unsubstantiated or malicious, the LADO should refer the matter to the children's social care services to determine whether the child/young person concerned is in need of services, or may have been abused by someone else. If an allegation is shown to be deliberately invented or malicious, the Centre Principal should consider whether any disciplinary action is appropriate against the learner who made it; or whether the police should be asked to consider if action might be appropriate against the person responsible, even if he or she was not a learner.

Learning lessons: At the conclusion of a case in which an allegation *is* substantiated, the LADO will review the circumstances of the case with HR /Safeguarding Lead to determine whether there are any improvements to be made to the college's procedures or practice to help prevent similar events in the future. This will include issues arising from the decision to suspend the member of staff, the duration of the suspension and whether or not suspension was justified. Lessons should also be learnt from the use of suspension when the individual is subsequently reinstated.

Leaders and Managers with Safeguarding Responsibility

Overall strategic responsibility:
Centre Principal

Responsibility for Safeguarding learners:
Safeguarding Lead

Overall responsibility for Safer Recruitment and Employee Allegations:
Director of Human Resources

Author: K. Cash
Date: September 2023

Appendix 1

Actions following a disclosure (child on child abuse)

- **Manage Internally** – In some cases of child on child abuse, for example, one-off incidents, the College may take the view that the children/ adults at risk concerned are not in need of early help or that referrals need to be made to statutory services, and that it would be appropriate to handle the incident internally, through utilising their behaviour policy and by providing pastoral support.
- **Early Help** – The College may decide that the children/ adults at risk involved do not require referral to statutory services but may benefit from early help. Early help means providing support as soon as a problem emerges, at any point in a learner's life. Providing early help is more effective in promoting the welfare of children/ adults at risk than reacting later.
- **Referrals to children's (or adult) social care** - Where a child has been harmed, is at risk of harm, or is in immediate danger, the College will make a referral to local children's (or adult) social care. At the point of referral to children's (or adult) social care, the College will generally inform parents or carers, unless there are compelling reasons not to (if informing a parent or carer is going to put the child/ an adult at risk at additional risk). Any such decision should be made with the support of children's (or adult) social care. If a referral is made, children/adult social care will then make enquiries to determine whether any of the children/ adults at risk involved are in need of protection or other services.
- Where statutory assessments are appropriate, the College (especially the designated safeguarding lead or a deputy) will work alongside, and cooperate with, the relevant lead social worker. The College will be mindful that early information sharing is vital for the effective identification, assessment, and allocation of appropriate service provision, whether this is when problems first emerge, or where a child/ adults at risk is already known to local authority children's/adult social care (such as a child in need, a child with a protection plan, Look after Children).
- Providing Safeguarding Services to Children, Young People, Parents and Carers supports staff who must make decisions about sharing information. For further information see:

<https://www.gov.uk/government/publications/safeguarding-practitionersinformation-sharing-advice>

Considerations with regard to the Data Protection Act 2018 (DPA) and UK General Data Protection Regulation (UK GDPR). DPA and UK GDPR do not prevent the sharing of information for the purposes of keeping children/ adults at risk safe and promoting their welfare. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare of children/ adults at risk. Collaborative working will help ensure the best possible package of coordinated support is implemented for the victim and, where appropriate, the alleged perpetrator(s) and any other children/ adults at risk that require support.

- **Reporting to the Police** - Any report to the police will generally be in parallel with a referral to children's/adult social care (as above). Where a report has been made to the police, the College will consult the police and agree what information can be disclosed to staff and others, in particular, the alleged perpetrator(s) and their parents or carers. The College will also discuss the best way to protect the victim and their anonymity. In some cases, it may become clear very quickly that the police (for whatever reason) will not take further action. In such circumstances, the College continue to engage with specialist support for the victim and alleged perpetrator(s) as required.