Safeguarding, Child Protection and Adults at Risk Policy 2025-26

1 Overview Information

Lead Responsible:	Designated Safeguarding Lead
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Content

1. Legislative Framework

Safeguarding Young People (Children)

1.1 In June 2004 Section 175 of the Education Act 2002 came into force, this in conjunction with the Education and Training (Welfare of Children) Act 2021, places an explicit responsibility on governing bodies for safeguarding and promoting the welfare of children as part of fulfilling their common law duty of care towards the children for whom their organisation is responsible. In addition, appropriate arrangements must be made in accordance with any guidance and legislation issued by the Secretary of State as detailed in Appendix1.

1.2 Keeping Children Safe in Education (KCSIE) is statutory guidance from the Department for Education issued under Section 175 of the Education Act (2002) under this and the Education

and Training (Welfare of Children) Act 2021 means that Schools and colleges must have regard to it when carrying out their duties to safeguard and promote the welfare of children. KCSIE is updated annually, this policy is in line with the September 2025 version.

- KCSIE (2025) defines safeguarding and promoting the welfare of children as:
- Providing help and support to meet the needs of children as soon as problems emerge
- protecting children from maltreatment whether that is inside or outside of the home, including online
- 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;
- Taking action to enable all children to have the best outcomes.

1.3 This policy and procedure has been developed in response to KCSIE and the associated Statutory legislation. This includes Working Together to Safeguard Children 2023.

1.4 The Children Act (1989) defines a child as any person under the age of 18 years. This includes all 14–16 year old children attending College campuses.

Safeguarding Adults at Risk

1.5 This policy and the associated procedures have been developed in response to guidance issued on the protection of adults considered vulnerable in the DfES/NIACE publication "Safer Practice, Safer Learning "(2007). The guidance applies to all education providers of post-16 learning and skills.

1.6 The Care Act (2014) Section 14.2 states: The safeguarding duties apply to an adult who: is over the age of 18, have needs for care and support (whether or not the local authority is meeting any of those needs) whether or not these have been formally assessed,; 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.

The term 'Adult at Risk' is used to describe a vulnerable adult.

Keeping Children Safe in Education – (KCSiE) Statutory Guidance for schools and colleges Information for all school and college staff

1.7 The Department for Education revised the guidance KCSiE which will come into force for schools and colleges from 1st September 2025. The guidance not been significantly changed this year most changes are technical. Below are the most significant changes:

- Specific inclusion of misinformation, disinformation and conspiracy theories as safeguarding harms (para 128)
- Reference to AI and links to guidance on safe use (para 143)
- Reference to the extended role of the Virtual Head in supporting educational achievement in kinship care (para 199)
- Reference is made to new guidance that is expected to be published this summer in relation to gender questioning children

2. Purpose of Policy

2.1 The College is committed to safeguarding all students, apprentices and staff. There are policies and procedures in place to ensure this occurs to maintain a safe environment. The purpose of this policy is to:

- Set out the framework to safeguard children, vulnerable adults and any students to promote their welfare and safety.
- Outline the responsibilities within the College in relation to safeguarding children and vulnerable adults in line with current legislation, guidance and best practice.

3. Policy Statement and Scope

3.1 The College always aims to create and maintain a safe environment for all students, staff, volunteers and visitors. This policy is one of a suite of policies and procedures intended to ensure that the College fulfil their safeguarding responsibilities. This policy is consistent with all other policies adopted by the College and should be read in conjunction with the policies identified in **(Appendix 1).**

3.2 The College's core safeguarding standards and principles are:

The College fully recognises its responsibility for safeguarding and protecting all students at each campus. The Governing Body holds responsibility for ensuring that the safety of students is at all times of paramount importance and safeguarding arrangements are effective in practice, monitored carefully and any deficiencies promptly remedied. This policy sets out the clear and consistent framework for delivering these responsibilities in line with safeguarding legislation and statutory guidance.

- The welfare and safety of our students is paramount, and this principle underpins all safeguarding work.
- All our students have the right to access their College (on site or remotely) free from fear of harm and be protected from mistreatment, abuse, discrimination and exploitation.
- Students are encouraged to talk and are listened to when they have a worry or concern and are aware of who to approach
- Disclosures about concerns made by students or staff will be taken seriously and prompt actions taken to support and protect them.
- A commitment to the health, safety and wellbeing of students, underpinning a successful learning experience.
- A commitment to ensure a safe and secure environment through safe recruitment practice and procedures and compliance with Health and Safety requirements.
- A commitment to deliver an effective safeguarding curriculum that is tailored to meet the specific needs and vulnerabilities of all learners but also including those that are the victims of abuse, or with special educational needs or disabilities as well as learners from the LGBTQ+ communities or any other identified vulnerable group. This is

delivered through the vocational curriculum, induction, tutorial programme and enrichment activities, supported by the safeguarding team

- A commitment to ensure that ongoing safeguarding training and support is in place for all staff and volunteers across the College to ensure that everyone is aware of their responsibilities in relation to safeguarding and follow the necessary policy and procedures to protect young people and promote their welfare

3.3 Whilst the Governing Body holds the overall statutory responsibility for the child protection and safeguarding functions of the College, the day-to-day operational responsibility rest with the Principal. The statutory duty to ensure action to safeguard and promote the welfare of young people and adults receiving education and training within the college will be delegated to a senior manager and designated person responsible for safeguarding to lead on local arrangements and at all campuses

3.4 This policy sets out the College's safeguarding framework, standards and commitment to ensure that all its students are protected from abuse and the risk of harm including Radicalisation and Extremism as expressed in the Prevent Duty.

3.5 The policy is applicable to all on-site, off-site and online activities undertaken by our students whilst they are the responsibility of the college.

3.6 Our policy applies to all staff employed within the College regardless of contract type staff working on site employed by other services and agencies and those working with students on placements, governors, external visitors, consultants and volunteers working for each of our college's campuses.

3.7 The College supports the procedures set out by each local safeguarding children's board where our campuses are located.

3.8 The College reserves the right to refuse admission to any student who may pose a risk to other students and has appropriate student admissions procedures in place.

Trauma Informed Practice

3.9 Trauma-informed practice develops from the understanding of how trauma exposure can affect our neurological, biological, psychological and social development. Trauma-informed approaches are founded on the understanding and acceptance that symptoms and experiences related to trauma are coping strategies established by people to manage traumatic experiences. Trauma-informed practice seeks to avoid re-traumatisation by using the principles of safety, trustworthiness, choice, collaboration, empowerment and cultural consideration. There is a natural crossover with this approach from the principles of adult safeguarding, which are empowerment, prevention, proportionality, protection, partnership and accountability.

3.10 Some of our students will have experienced trauma and to support these students' staff have undergone training to understand better the effects of trauma. In the event of traumatic incidents happening in the year the Safeguarding team and wider well-being team will help students to reflect and give further support if this is required.

4. Safeguarding Procedure and Guidance on Reporting Concerns

4.1 The College has a set procedure and guidance to follow if staff receive a disclosure, are concerned a student is at risk of harm or worried about their wellbeing. These can be found in Appendix 2, 3 and 6 of this policy and includes the identification of:

- Nominated College Strategic Safeguarding Lead who is a member of the SLT with a responsibility to ensure the College meets its statutory duty
- Nominated College Designated Safeguarding Lead with an operational responsibility for safeguarding issues with the College
- Nominated Deputy Designated Safeguarding Lead who works with and deputises for the DSL when they are not on site or available
- College Designated Safeguarding Officers who have day to day operational responsibility for safeguarding and ensure that safeguarding concerns are actioned by the college

4.2 All staff should know how to recognise types of abuse and neglect Appendix 4 and what steps they should take to raise a safeguarding concern Appendix 6 with a Designated Person at the college, how to record concerns and respond to students in need or at risk. Guidance in Managing disclosures can be found in Appendix 2 of this policy and will be included as part of staff induction and ongoing support is available from the Designated Safeguarding Officers located on each campus Appendix 6.

4.3 The safeguarding Roles and Responsibilities of all members of staff at the college are detailed in Appendix 7. All Staff must ensure they read and understand the role they undertake in safeguarding Students and how the Designated Safeguarding Lead at the college will deal with a concern they could raise and what happens if a referral is made to a social care agency.

4.4 All staff must read and understand Part 1 of 'Keeping Children Safe in Education' statutory guidance for schools and colleges. (DfE)

4.5 All new staff and governors are given an Executive copy of the Safeguarding, Child Protection, Adults at Risk and Code of conduct and Ethical Framework Policy as part of the College's induction process and are expected to read and sign to confirm that they have read and will adhere to the full policy.

5. Restraint and Reasonable Force

5.1 Section 93 of the Education and Inspections Act 2006 enables College staff (including support staff, non-teaching staff and voluntary staff) to use such force as is reasonable in the circumstances to prevent a student from committing an offence, causing personal injury to any person (including themselves) or damage to any property or prejudicing the maintenance of good order and discipline. This includes occasions when the student is not on College premises e.g. on College visits.

5.2 Section 45 of the Violent Crime Reduction Act 2006 gives authorised staff the right to search students for weapons without their consent, where they have reasonable cause to suspect they are carrying a weapon. If resistance is expected the police MUST be called.

5.3 Guidance is given to staff on appropriate behaviour including the use of reasonable force. Further guidance to staff can be found in the Force to Control Students Policy which is informed by the DfE document 'Use of Reasonable Force' 2012.

5.4 There should be a rigorous recording system and procedures at the College and reporting to the Local Authority. There is a model recording form in the DCSF Guidance.

5.5 Parents/carers should be informed when reasonable force has been used and protocols agreed with parents/carers if use of reasonable force is thought likely. It is good practice for the member of staff with responsibility for child protection to check the record and to give the member of staff involved in the incident a copy. Students displaying extreme behaviour in relation to a learning disability, autistic spectrum condition challenges, behavioural, emotional and social difficulties or with severe behavioural difficulties should be handled according to the guidance in www.teachernet.gov.uk/wholeschool/sen/piguide.

5.6 S548 Education Act 1996 states that the use of force as a punishment is unlawful. Also under Part 4 of the Disability Discrimination Act 1995 (as amended by the Special Educational Needs and Disability Act 2001), it is a requirement:

- Not to treat a disabled child unfavourably without justification.
- To take reasonable steps to avoid putting disabled students at a substantial disadvantage.

6. Recording and Referral

6.1 Concerns and confidential comments are to be recorded in Pro Monitor. These comments can be related to safeguarding or other issues, the safeguarding comments automatically get sent to the safeguarding team to pick up, in the same way they do if issues are reported via the safeguarding email or telephone reporting systems. Safeguarding cases and concerns are logged on My Concern: these are monitored and referrals to Children's Social care, Child Protection Conferences and any other relevant documentation relating to the safeguarding concern are recorded here and are held confidentially and separately from the learners' other records

6.2 Recording is a tool of professional accountability and is central to safeguarding and protecting students. It is not always possible to know whether a small or vague concern held today may increase as the days or weeks pass and later form the substance of a child or vulnerable adult protection referral. For this reason, it is vital that concerns are recorded accurately so that they can be monitored and emerging patterns noticed. Records should be signed, dated and kept in chronological orders. College actions minuted in child protection conferences or strategy meetings must be implemented.

6.3 If a student discloses that they have been subjected to abuse to any staff member, the staff member must follow the agreed protocol as outlined in Appendix 2, 3 and 6. The Designated person or a nominated officer will then respond within an hour, confirm the next steps and if necessary make a referral to the appropriate agency e.g. Children's Social Care in the student's home borough.

6.4 Where a student is transferring to another college or establishment, the College's Designated Safeguarding Lead should liaise with the college or establishment and forward them copies of the student's safeguarding records.

6.5 Students under 16 years' old who are enrolled at Schools or other organisations are, in normal circumstances, also subject to the policy of the referring organisation, however, in urgent situations the College safeguarding staff will contact external agencies without delay and then coordinate with the sending institution.

7. Supporting Students: Mental Health and Well Being

7.1 The College has in place pastoral support systems that reflect the governing body's legal obligation and commitment to safeguard and promote the welfare and wellbeing of all students as outlined in KCSIE 2025. The College recognises the value of early help, early intervention and coordinated support through full cooperation with interagency working arrangements. This means ensuring that support is provided as soon as the concern arises.

7.2 In line with KCSIE 2024, Early help relies upon local agencies working together to:
- Identify children and families who would benefit from early help
- Undertake an assessment of the need for Early help
- Working together with targeted early help services to ensure that appropriate support is in place in order to improve outcomes for the child
- This includes timely responses to section 17 and 47 requests

7.3 All children benefit from early help but staff are to pay particular attention to the need for early help for a child who:
- Is disabled or has specific additional needs
- Has special educational needs
- Has a mental health need
- Is a young carer or looked after child
- Is at risk of CSE or shows signs of being drawn into criminal behaviour
- Has experienced multiple suspension or is at risk of permanent exclusion
- Is frequently missing or goes missing from education
- Is the child affected by parental offending or has family circumstances presenting challenges for the child such as domestic violence or parental drug/alcohol misuse

7.4 The College will support students to be successful and feel confident in terms of their:
- Physical, mental health and emotional wellbeing
- Protection from harm and neglect
- Education, training and recreation
- Contribution to society
- Social and economic wellbeing

7.5 The College provides clear guidance on how best to meet the varied needs of different Student groups, including the engagement and support to those deemed as vulnerable.

7.6 In the case where learners are facing a severe mental health challenge or there is a real and imminent risk of suicide or significant harm. The safeguarding team will implement the Suicide Safety plan (annexe 13). The college will ensure that all necessary parties are informed so that they may act to try and ensure the most appropriate form of treatment. Where the is a significant decline in the mental health of a learner, irrespective of age, the learners' Next of Kin will be informed.

8. Complaints and Allegations against Staff, Agency Workers and Volunteers

8.1 The College takes seriously all complaints made against adults in positions of trust. Procedures are in place at the College for students, parents/carers and staff to share any concern that they may have about the actions of any member of staff or volunteer to a Designated Safeguarding Lead, they will then ensure that the DMAASV is informed in a timely and accurate manner. Allegations made against staff, agency workers and volunteers will be dealt with according to the process laid out in DFE guidance and local social care/police arrangements where each campus is located will be followed to investigate and resolve complaints without delay. This includes notifying the individual's employer and reporting to LADO as appropriate

8.2 The College's Strategic Designated Safeguarding Lead is the identified Designated Member for Allegations against Staff, Agency Workers and Volunteers (DMAASV) who will deal with issues of staff (Agency or Volunteer) inappropriate conduct towards a student. They will work with the Colleges' Designated Safeguarding lead and Head of Human Resources to confirm the details of individual cases and to reach a decision on the way forward, including reporting the matter to the Local Authority Designated Officer as appropriate or seeking advice. Written statements, that are signed and dated by the complainant should be obtained as part of this investigation

8.3 Should the threshold of harm be met i.e. that a member of staff, (including agency or volunteers)

- Have behaved in a way that has harmed a child or vulnerable adult
- Possibly committed an offence against/relating to a child or vulnerable adult
- Behaved in a way towards a child that suggests they may be a risk
- Behaves in a way to suggest that they are not suitable to work with children then this will be referred to LADO and HR will take instruction from them and proceed with the appropriate course of action

8.4 If the Chief Executive or Chair of Governors is the subject of the allegation or concern, this should also be reported to Strategic Designated Safeguarding Lead in order that they may activate the appropriate procedures.

8.5 Staff will not investigate cases of suspected abuse themselves. The College will cooperate fully with the Police and Children's Social Care. Please refer to the procedures detailed in Appendix 6 and refer to the Staff Code of Conduct (Appendix 1).

8.6 Learning from all investigations against staff and volunteers should be incorporated by the College into its' procedures and not only those that are concluded and substantiated (KCSIE 2023).

8.7 All staff need to be aware of how to handle low level concerns and allegations against staff and volunteers. Allow level concern is defined as (KCSIE 2024) any concern, no matter how small and even if no more than causing a sense of unease or a "nagging doubt", that an adult working for the college may have acted in a way that is:

- Inconsistent with the staff code of conduct
- But does not meet the threshold of harm required for a LADO referral.

  Examples of such behaviour include but are not limited to:
- Being over friendly with students, including engaging with a young person on a 1:1 basis behind closed doors or in a secluded area
- Having favourites
- Taking photographs of a student on a personal mobile phone
- Humiliating a student
- Using inappropriate, intimidating, offensive or overly sexualised language

8.8 If this is witnessed or suspected, the member of staff should report the concern to the DSL and head of HR, whilst completing the Low level concern form. Concerns, however small can also be shared with any member of the Senior Leadership Team (SLT) This allegation will then be investigated and the appropriate sanction or training for the staff member will be put in place. Records of low level concern allegations will be recorded in a confidential spreadsheet by the HR team. Where necessary appropriate advice and guidance will be given to the staff member in respect of how their behaviour may be interpreted by others and support offered to enable colleagues to perform their duties in line with the staff code of conduct.

9. Safe Recruitment and Staff Appointments

9.1 The College is committed to the process of maintaining a culture of safer recruitment and adopting recruitment processes that will help to deter, reject or identify unsafe adults who might abuse students or who are unsuitable to work with them. The College is committed to evidencing this practice in relation to all staff working with students. Recruiting managers will undertake safer recruitment training and this will be refreshed every 3 years

9.2 All staff recruited will be subject to appropriate identity, qualification and health checks. References will be verified and appropriate Disclosure and Barring Services (DBS), barred/prohibited persons list checks will be undertaken in accordance DfE guidance "Keeping Children Safe in Education: Statutory guidance for schools and colleges, DfE Regulated activity in relation to children and the relevant regulations and codes of practice as issued by the DBS. It is the policy of the College to undertake DBS re-checks. In line with the advice from the AOC (August 2019) this will include the introduction of annual self-declaration and a DBS re-check every 3 years. The College will continue to uphold best practice in safer recruitment as outlined in KSCIE 2025.

9.3 All applicants for employment are required to complete an application form which requires them to declare if they have a criminal conviction. The College reserves the right to decline any applicant who fails to answer the question. The College shall consider taking disciplinary action in accordance with the staff disciplinary procedures if it is discovered that a member of staff has provided false or incomplete information as part of the recruitment process.

9.4 Relevant members of staff and governors who are involved in recruitment will undertake online safer recruitment training. All recruitment panels must have at least one member who has successfully completed this training and individuals who are in charge of recruitment, will also have successfully completed this training within the past 3 years.

9.5 The College will only use employment agencies which can demonstrate that they have carried out pre-employment checks on their supply staff and will report the misconduct of temporary or agency staff to the agency concerned and to the Local Authority's Designated Officer (LADO). Staff joining the College on a permanent or temporary basis will be given a copy of this policy. Additionally, induction briefings will include safeguarding procedures, the Staff Code of Conduct and the allegations against staff procedures.

9.6 All students and applicants for admission to a programme of study offered by the College are required to complete either an application form or an enrolment form, which requires them declare if they have a criminal conviction. As applicants are required to disclose details of criminal convictions, the College reserves the right to decline any applicant who fails to answer the question. The College shall consider taking disciplinary action in accordance with the student disciplinary procedures if it is discovered that a student has provided false or incomplete information as part of the enrolment process and in conjunction with the colleges' Criminal Convictions Declaration policy. This includes declaring a criminal conviction once the course of study or employment has commenced

9.7 Where it is revealed that during a course a student has obtained a criminal record and not disclosed this, the College may consider appropriate disciplinary action, dependent on the severity and impact of the disclosure.

9.8 In the process of recruiting, online searches will be undertaken by HR as part of due diligence in the process. This may help identify incidents or issues which have taken place publically or online, which the recruiting manager may wish to discuss as part of the recruitment process (KCSIE 2024)

10. Work Experience, Placements, Work Based Learning and Educational Trips

10.1   The College will ensure that:

- Risk Assessment Health and safety checks are undertaken prior to establishing work experience placements or before taking students out on educational trips or visits
- Employers and providers are aware of and are carrying out their responsibilities in relation to Safeguarding and the protection of Children and Adults at Risk, ensuring that providers have appropriate policies and procedures in place which are followed by all staff
- Staff, volunteers, employers and work placement providers are aware of the action to be taken and by whom, should a safeguarding issue be raised before, during or after the placement.
- Staff are appropriately trained to carry out the health and safety work placement audit.

11. Staff Code of Conduct and Ethical Framework

11.1   The College recognises that positive professional relationships with students will support and promote the best outcomes for them. All staff (paid, including agency and voluntary and for the purposes of this policy this also includes Apprentices but not students on work placement) are expected to adhere to the College's 'Code of conduct and Ethical Framework Policy' (Appendix 1) in respect of their contact with students and their families, on site, off site and online. Adherence to this code will ensure that members of staff can appreciate clear boundaries in order to protect both themselves and their students and prevent them from engaging in any activities that could be misinterpreted, be deemed illegal or be harmful to students.

11.2   Staff must ensure that they fully understand and maintain the professional boundaries explicit in these policies and that any relationship between a professional and a student under the age of 19 or a student who is a vulnerable adult may result in an immediate referral to the Local Authority Designate Officer (LADO). Should a personal relationship already exist when a student joins the College, the member of staff must inform their line manager so appropriate arrangements can be made to secure safe practice.

11.3   The College recognises that in certain disciplines contact with a student to improve their understanding of their motor skills may occur through touch. All staff tutoring these curriculum areas must ensure they have consent from the student before making contact and from the parent/guardian if the student is a child or vulnerable.

12. Information Sharing and Confidentiality

12.1   The College respects the right of students and families to have their personal information treated respectfully and confidentially in line with General Data Protection Regulations (2018) and local statute and guidance. Confidential Child Protection information regarding students in our College will be shared with staff on a strictly need to know basis. A member of staff will 'need to know' information when it will demonstrably benefit the student and maintain appropriately agreed confidentially at all times.

12.2   All staff must be aware of their responsibility to share information with the Safeguarding Team and with other agencies in order to protect and safeguard students. This must be done in accordance with the College's Safeguarding, Child Protection Policy and Adults at Risk Policy. If there is uncertainty about the need to share information advice will be sought by the appropriate Safeguarding Team of the designated Data Protection Officer on this issue and where necessary from the appropriate local authority.

12.3   No one in the College may guarantee confidentiality to a student and must make it clear that information will be shared if there are concerns about the welfare of a student, even if they do not consent to the sharing of information. Where a student has refused consent for information to be shared, the reason for refusal must be recorded. Refusing consent should never prevent information being shared to safeguard or protect the student.

12.4   No one in the College may guarantee to a student that they will keep a secret or confidence and must always make it clear to a student in language that is appropriate, that any information which

leads a member of staff to be concerned that a student is suffering or is at risk of suffering harm will be shared with the Safeguarding Team in order to take measures to safeguard the student at risk.

12.5   Disclosing confidential information should always take place if it is a proportional response to meet the need to safeguard and promote the welfare of a student.

13. E-Technology and E-Safety

13.1   The College has identified and appointed members of staff with the responsibility for monitoring the safe and appropriate use of E technology and to deal with any concerns about inappropriate use. Refer to Appendix 1 - ICT Acceptable Use Policy and Protocols for Online Learning Appendix 12.

13.2   The College promotes E-safety in the delivery of the curriculum. E-safety refers to the safe use of internet and other electronic forms of communication such as e-mail, text messages, Face-book and other social media platforms that can expose young people and vulnerable adults to risks. The College will support students to recognise and manage risks associated with online activity that can be harmful such as online grooming, and the inappropriate use of social media for sexting, hazing and cyber bullying and other abusive acts that intimidate, threaten or lead to physical, emotional or psychological harm of any student at the College. Students through their tutorial programme undertake various tutorials around safeguarding and Prevent whilst at the college and this includes a unit on keeping safe online.

13.3   The College will ensure the effective monitoring, filtering and blocking of material deemed harmful to learners and or staff, on college devices or networks, this includes but is not limited to material that is deemed to harass, bully, share consensual or non-consensual explicit images and the viewing and sharing of pornography. It also includes the use of generative artificial intelligence

13.4   The responsibility for ensuring the effective monitoring and filtering of online activity lies with the Designated Safeguarding lead in conjunction with the Safeguarding link Governor and Vice Principal.

13.5   This provision will be reviewed annually to ensure it effectively safeguards young people and vulnerable adults.

13.6   SLT will be provided will a monthly report that outlines any harmful online activity, the type of concern raised, and actions taken.

14. Extended Services and Activities

14.1   The Governing Body of the College is responsible for controlling the use of the College premises both during and outside normal hours, except where a trust deed allows a person other than the Governing Body to control the use of the premises, or a transfer of control agreement has been made. Where services are provided directly under the supervision and management of the College, the College's safeguarding policies and procedures will apply.

14.2   Where activities and services are provided separately, the Governing Body will seek assurances and evidence that the body concerned has appropriate safeguarding and child protection policies and procedures in place and that there are agreed arrangements to liaise with the College on these

matters where appropriate. Evidence of appropriate policies and procedures must be provided to the Governing Body. The Governing Body will only work with providers that can demonstrate that they have effective child protection policies in place, provide appropriate training for staff and that the vetting arrangements for their staff are compatible with those of the local authorities and government guidance.

14.3   All staff providing services to students whether on site or in the community on behalf of the College must adhere to the College's Safeguarding, Child Protection and Adults at Risk policy.

14.4   Staff from partner agencies working with students off site will follow the referral procedures of their own agency and will inform the Safeguarding Team they have made a child or vulnerable adult protection referral as a matter of priority.

15. Site Security, Contractors and Agency Staff

15.1   All students and staff should be able to feel safe when they are on the campus. All staff and students are expected to have appropriate ID at all times. Visitors will be asked to show their ID where appropriate (for example Ofsted and other professionals who are visiting the site), and to sign in and wear a visitor's badge/lanyard at all times. No visitor will be allowed access to a site unless they are met and accompanied by a member of staff Appendix 1 Health & Safety Policy & External Visitors Guidance.

15.2   Regular contractors who work on site will be DBS checked as part of their service level agreement/contract and will be expected to read and sign this policy and adhere to the Staff Code of Conduct and Ethical Framework Policies. Occasional contractors who have not undergone DBS checks will be supervised at all times while they are on site.

15.3   Agency staff and those who work within the College for one or two days will be asked to provide their DBS check before they can begin work. They will be given a copy of this policy and will be asked to sign to confirm that they have read and will adhere to it.

16. Working in Partnership with Parents and Carers

16.1   The College is committed to creating and maintaining a culture of openness and honesty and strive at all times to work in partnership with parents and carers. We believe that this is in the best interests of students and their families. Staff working for the College will engender an environment which develops co-operative working relationships within which parents and carers feel respected.

16.2   Parents and carers will be encouraged to access the safeguarding policy, and a summary of it is included in the literature given to students and families on admission which links to the appropriate page on the College web site.

16.3   The College believe it is important that parents and carers are aware of our statutory duty to safeguard and promote the welfare of students and that the College will, where necessary, share concerns about students with Children's Social Care or appropriate agencies.

16.4 Wherever possible and appropriate the College will aim to discuss concerns about students with their parents or carers and inform them if we intend to make a referral to Children's Social Care. The College will be alert to the needs of parents/carers who do not have English as their first language and use translation services as necessary.

16.5 There may be instances, when we judge that it is not appropriate to speak to a parent or carer before contacting Children's Social Care. This would happen when the College's Safeguarding Team judges that a student's wellbeing will be imperilled if the parent or carer is aware that a referral to Children's Social Care is to be made. We will also bear in mind 'Fraser Gillick competence' and this will inform judgements and decisions.

17. Monitoring and Review

17.1 A full safeguarding child protection and vulnerable adult report will be submitted to the Governing Body for the College annually. This will include monitoring information in relation to staff training, number of concerns raised regarding students including e-safety, record keeping, interagency referrals and outcomes in order to measure the effectiveness of this policy and strengthen practice where needed. In addition, a monthly report is submitted to the Senior Leadership Team.

17.2 This policy will be reviewed and updated annually by the College's Designated Safeguarding Lead and approved by the Senior Leadership Team and Academic Board. In addition, the policy will be reviewed annually by the Governors', specifically the safeguarding link Governor.

17.3 The Deputy Principal and DSL will monitor all incidents and cases that fall within the scope of this policy to ensure that staff are acting promptly in regards to safeguarding concerns and that the concerns are being monitored and reviewed in a timely and accurate way.

18. Safeguarding Training for Capel Manor College Staff

18.1 Safeguarding our learners is a key priority for the Group and we are committed to ensuring that all staff are well trained and feel confident to carry out their safeguarding duties and responsibilities.

18.2 The College's nominated designated safeguarding team undergo a dedicated induction course and refresher training annually. Ongoing safeguarding training as new guidance and local and national priorities emerge will be undertaken to ensure they are aware of current safeguarding issues and best practice.

18.3 All staff will undertake Safeguarding, Child Protection and Prevent as part of induction. They will refresh this training annually, ensuring that they have read and understood KCSIE part 1. The DSL will ensure that training is conducted to respond to both local and national concerns and that all staff are fully briefed to deal with concerns as the arise

18.4 The responsibility of ensuring that all staff employed by the Group receive appropriate training rests with the Director Human Resources and DSL

18.5 A central record of mandatory Safeguarding staff training is held with the HR team.

18.6   Staff with specific roles to ensure support for learners with a mental health difficulty will ensure that their training is relevant and up to date. Mental health First aid training will also be delivered to all staff that are in contact with learners with a mental health challenge to ensure that appropriate support is in place and students are fully supported and kept safe.

APPENDIX 1: Legal Framework, Statutory Guidance and Linked Capel Policies

The Safeguarding, Child Protection and Adults at Risk Policy and Procedures has considered and is compliant with the following legislation.

Legislation

- Children Act 1989 &2004
- Education Act 2002
- Education and Inspection Act 2006
- Serious Crimes Act (2015)
- The Education (Health Standards) (England) Regulations 2003
- Safeguarding Vulnerable Groups Act 2006
- School Staffing (England) Regulations 2009 (as amended)
- Equality Act 2010
- Protection of Freedoms Act 2012 • The Education (School Teachers' Appraisal) (England) Regulations 2012 (as amended)
- Children and Families Act 2014
- Sexual Offences Act 2003
- The Education (Pupil Registration) (England) Regulations 2006 (as amended)
- Mental Capacity Act 2005
- Human Rights Act 1998
- Safeguarding Vulnerable Groups Act 2006
- Care Act 2014
- Rehabilitation of Offenders Act 1974 and Legal Aid, Sentencing and Punishment of Offenders Act 2012)
- Data Protection legislation.
- Education and Training(Welfare of Children) Act 2021
- The Counter Terrorism and Security Act (2015)

Statutory guidance

- HM Government (2014) 'Multi-agency practice guidelines: Handling cases of Forced Marriage'
- DfE (2023) 'Working together to safeguard children: A guide to inter-agency working to safeguard and promote the welfare of Children' (2023)
- DfE Regulated activity in relation to children: scope (2018)
- 'Safeguarding Children and Safer Recruitment in Education' (Dept for Children, Schools and Families 2010).
- DfE (2015) 'What to do if you're worried a child is being abused'
- DfE (2015) 'Information sharing: advice for practitioners'
- DfE (2015) 'The Prevent duty'
- DfE (2018) 'Keeping children safe in education' September 2018
- DfE (2016) 'Disqualification under the Childcare Act 2006'
- DfE (2017) 'Child sexual exploitation'
- DfE (2017) 'Sexual violence and sexual harassment between children in schools and colleges'
- London Safeguarding Children Board multi agency procedures (version 5) 2017

- Protecting Adults at risk: London multi-agency policy and procedures for protecting adults at risk from abuse
- DfE The Designated teacher for looked-after and previously looked-after children (Statutory guidance on their roles and responsibilities) February 2018
- DfE "Coronavirus (COVID-19): safeguarding in schools, colleges and other providers" and the "Guidance for FE and Providers" on Safeguarding May 2020.
- Special Education Needs or Disability (SEND) Code of Practice (2015)
- DFE(2021) 'Keeping children safe in education' September 2021
- DFE (2022) Keeping children safe in education September 2022
- DFE (2023) Keeping Children safe in Education 2023
- DFE (2024) Keeping Children safe in Education 2024
- DFE (2025) Keeping Children Safe in Education 2025

Capel policies and procedures that relate to this policy include:

- Student Code of Conduct and Disciplinary Policy
- Ethical Framework Policy and Procedure
- Health and Safety
- Whistle Blowing Policy
- Code of Conduct for Staff
- College's External Visitors Guidance
- Bullying and Harassment (Students)
- Equity, Diversity & Inclusion policy
- Students Complaints Procedure
- Educational Visits with forms
- ICT Acceptable Use policy – (including E-Safe)
- Declaration & Barring Service
- Recruitment Policy
- Criminal Convictions Declaration Policy
- 14-16 Policy

APPENDIX 2: Summary Procedure for Reporting Disclosures

This procedure **must** be followed whenever any member of College staff hears an allegation from a child or vulnerable adult that abuse has, or may have, occurred or where there is a significant concern that a child or vulnerable adult may be abused, or where there are concerns that there has been a vocal or active expression of extremist views or behaviour:

RECEIVE

Open the conversation.
- Ask the *Safeguarding Question. - E.g. how are you, are you okay?*
- Set aside any judgments you may hold.
- Resist the temptation to give advice, argue or deny their feelings/experience
- Accept what you are told – you do not need to decide whether or not it is true
- Listen without interrupting, shock or disbelief.
- Encourage the student to talk.
- Ask appropriate clarifying questions

REASSURE

- The person making the disclosure
- Acknowledge their courage in telling
- Do not promise confidentiality
- Remind them they are not to blame – avoid criticising the alleged perpetrator
- Do not promise that "everything will be alright now" (it might not be)
- Give reassurance but don't make promises.
- Do not ask the learner to repeat their disclosure.
- Reflect back what the learner has said using minimal prompts (Mmm, Ah, etc.).
- Silence can be supportive.
- Open body language.
- Comfortable eye contact.
- Don't offer glib advice e.g. cheer up, things could be worse

REACT

- Do not delay in registering your suspicions or concerns
- Respond to the person making the disclosure but do not interrogate
- Avoid leading questions but ask open ended ones
- Clarify anything you do not understand
- **Explain what you will do next, i.e. inform a Designated Safeguarding Officer, Director of Student Services, or HR and Vice Principal if the concern relates to a member of staff.**

RECORD

- Make brief notes as soon as possible, possibly during the meeting.
- Include: time, date, place, the individual's own words – do not assume – ask, e.g. "Please tell me what xxxxx means".
- Use the words spoken by the student not your interpretations or 'proper' words.
- Record other non-verbal behaviour which the student might exhibit, include appearance
- Write up the notes as soon after the meeting as possible you need to refer this concern to safeguarding as soon as possible, this can be done by calling 429, 01992707027 or by making a confidential safeguarding comment on pro monitor

- Cross out mistakes – do not use Tippex
- Do not destroy your original notes – they may be asked for at a later date. Scan these and store in the student's folder in the 'Confidential' area on the respective College area.
- **Please note:** Once the referral to safeguarding has been submitted or the case has been passed to one of the College's Safeguarding Officers, the member of staff does not need to take no further action unless the Safeguarding Officer requires them to.

SUPPORT

- Consider what support is needed for the person making the disclosure – you may need to give them a lot of your time or they may need to be referred, 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.
  - Ensure you are supported – such interviews can be extremely stressful and time consuming
  - Once reported to them, the Designated Safeguarding Officer will take responsibility for the matter and will take the necessary actions. However, if you have questions or need additional support then do ask.

APPENDIX 3: Safeguarding Referral Form

REPORTING ALLEGED OR SUSPECTED ABUSE OR OTHER CAUSE FOR CONCERN OF A CHILD, VULNERABLE ADULT OR OTHER STUDENT TO A DESIGNATED SAFEGUARDING OFFICER

To be completed by a member of safeguarding staff if the disclosure is considered is considered to be abuse or the learner is at risk of significant harm.

Form Completed by		Tel no.	
Position		Date	
Sector/Service		Manager	

1. Alleged Victim or Safeguarding Cause for Concern Student **If there is more than one student, please fill in a separate sheet for each person**			
Surname:			
Forenames:			
ID No:			
Current Address:			
Postcode:		**Tel:**	**Mobile:**
Date of Birth:			

Has the student consented to the referral?	**Yes**		**No**		
Has the student the capacity to consent to this?	**Yes**		**No**	**Not known**	
Is the student aware of this referral?	**Yes**		**No**	**Not known**	

2. Alleged Abuser or person creating the safeguarding cause for concern If there is more than one person please give details of each			
Surname:			
Forenames:			
Current Address:			
Postcode:		**Tel:**	**Mobile:**
More than one alleged individual? (Please specify)			

3. The Abuse/Safeguarding Cause for Concern

Type of suspected safeguarding concern:

(Please tick all that apply)			
Child in Need (CIN) Plan		Forced Marriage	
Child Missing from Education		Gangs and Youth Violence	
Child Missing/Absent from Home/Care		Harmful Sexual Behaviour	
Child Protection - Emotional Abuse		Hate Incident	
Child Protection - Physical Abuse		Historical Concern	
Child Protection - Sexual Abuse		Human Trafficking	
Child Protection Plan		Mental Health	
Child Sexual Exploitation		Modern Slavery	
County Lines		Neglect	
Criminal Exploitation (Children & Adults)		Peer on Peer Abuse	
Cyber-bullying		Personal Hygiene	
Dangerous Behaviour		Self-harm	
Discrimination		Sexual Abuse	
Domestic Abuse		Sexual Violence	
Drug Misuse		Suicidal Thoughts	
Extremism & Radicalisation		Weapon(s)	
Financial/Economic or Material Abuse		Other	
Child Criminal Exploitation			

Cause for concern (please specify)

Place where suspected safeguarding concern took place: (Please specify):

Alleged victim's own home		Alleged victim's parent's home		Residential care home	
Alleged victim's relative's home		Alleged perpetrator's own home		College (give details)	
Adult placement scheme		Other (please specify)			
Address where suspected safeguarding concern took place (if known)					

Are there witnesses? If yes, provide contact details.

Name and address of witness		
	Tel:	Mobile:

Name and address of witness		
	Tel:	Mobile:

4. Additional Information: Please provide as much detail as possible about the abuse/safeguarding cause for concern you are reporting.
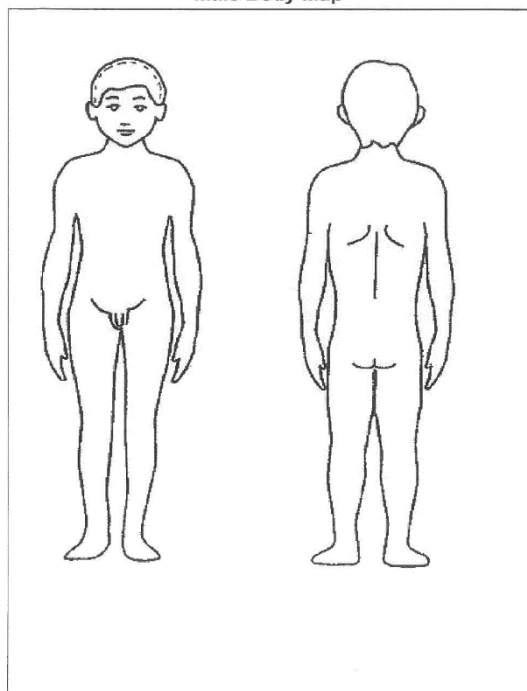
5. Actions taken

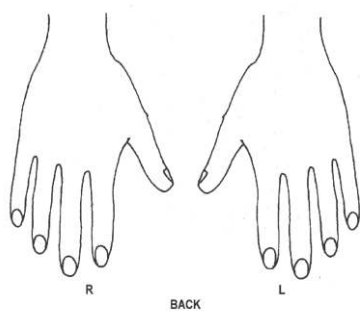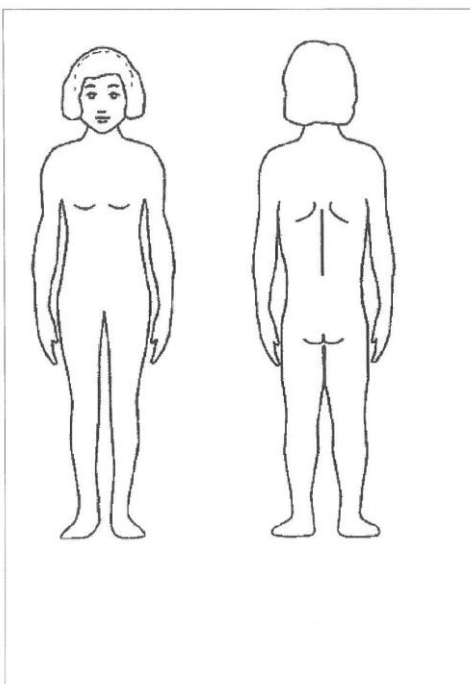**Have you taken any actions other than completing this form?** (Please specify)

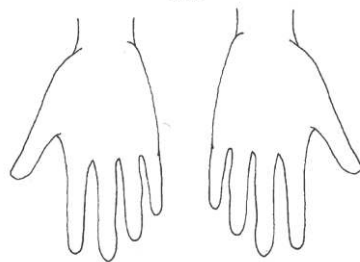**If appropriate please use a body map**

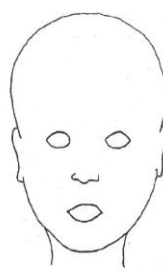Male Body Map

Female Body Map

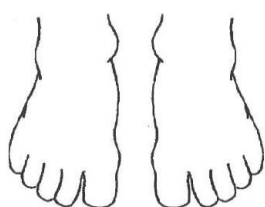R BACK L

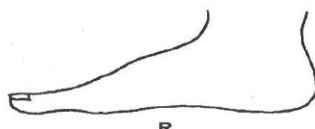R PALM L

FRONT BACK

RIGHT LEFT

R TOP L

R BOTTOM L

R INNER L

R OUTER L

APPENDIX 4: Types of Abuse and Neglect and Other Indicators

Abuse is defined within Keeping children safe in education as any form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. 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. Abuse can take place in the following ways:

Physical abuse: is 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 persistent 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 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 participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyber bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, though it may occur alone.

Sexual abuse: Involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (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 (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

Child Sexual Exploitation: is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology. CSE can occur over time or be a one-off occurrence, and may happen without the child's immediate knowledge e.g. through others sharing videos or images of them on social media.

Child Criminal Exploitation (Including County Lines): This is a form of abuse where due to an imbalance of power an individual or group, groom, bully or coerce a young person to complete a criminal act

Neglect and Acts of Omission: is when a vulnerable adult or child does not have their basic needs met through a persistent failure to address their physical or psychological needs, this can include failure to provide adequate food or warmth or help with personal hygiene. It may also include inadequate shelter including exclusion from home or abandonment, failure to ensure adequate supervision including the use of

inadequate carers, or the failure to ensure access to appropriate medical care or treatment. Signs might include deteriorating health, appearance or mood.

Psychological Abuse: such as threats of harm or abandonment, humiliation, blaming or controlling behaviour, verbal insults, enforced isolation, intimidation and coercion.

Discriminatory Abuse: this includes any sort of abuse based on a vulnerable adults or child's race, gender or impairment such as their mental or physical health

Domestic Abuse: This can be psychological, physical, financial or emotional and impacts on children through what they are seeing hearing or experiencing. The Domestic Abuse Act 2021 recognises children as victims of domestic abuse in their right. Incidents where students disclose domestic abuse should be reported to the DSO immediately

Institutional Abuse: this is poor professional practice in an institution designed to safeguard both children and adults, including neglect, and can take the form of isolated incidents right through to ill treatment or gross misconduct.

Financial or Material Abuse: this is when a child/vulnerable adult are exploited for financial gain. It includes theft, fraud, exploitation, misuse or misappropriation of property/finance etc.

Child on Child Abuse: Staff must be aware of child on child on peer abuse and how this can manifest itself through bullying, including cyber bullying, physical abuse, initiation or hazing, sexual harassment/violence, up skirting, sexting and the sharing of consensual or non-consensual nude or semi-nude pictures or videos. Staff must be familiar with their respective Learning and behaviour policy which addresses the factors associated with child on child abuse abuse. Upskirting refers to a form of peer on peer abuse, which 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.

It is essential that **all** staff understand the importance of challenging inappropriate behaviours between peers, 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. Staff should also be aware that children identifying as LGBT can be targeted by other children and whilst being LGBT does not make them automatically vulnerable it can be a contributing factor

Children who are absent from education
All staff should be aware that children being absent from school or college, particularly repeatedly and/or for prolonged periods, and children missing education can act as a vital warning sign of a range of safeguarding possibilities. This may include abuse and neglect such as sexual abuse or exploitation and can also 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, socalled 'honour'-based abuse or risk of forced marriage. 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 their school's or college's unauthorised absence procedures and children missing education procedures.

Children with family members in prison
Approximately 200,000 children in England and Wales have a parent sent to prison each year. These children are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. Www.nicco.org.uk provides information designed to support professionals working with offenders and their children, to help mitigate negative consequences for those children. Child Criminal Exploitation (CCE) and Child Sexual Exploitation (CSE

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. Children can be targeted and recruited into county lines in a number of locations including schools (mainstream and special), further and higher educational institutions, pupil referral units, children's homes and care homes.

Children are also increasingly being targeted and recruited online using social media. Children can easily become trapped by this type of exploitation as county lines gangs can manufacture drug debts which need to be worked off or threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

Some 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 'traphouse 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.

Further information on the signs of a child's involvement in county lines is available in guidance published by the Home Office

Radicalisation, Extremism and Terrorism: in respect of safeguarding individuals from radicalisation, the College works to the Prevent element of the Government's Counter Terrorism Strategy, and where deemed appropriate seeks external support for students through referrals to the Channel Programme. This programme aims to work with the individual to address their specific vulnerabilities, prevent them becoming further radicalized and possibly entering the criminal justice system because of their actions. It is recognized that radicalisation can occur to an individual from any section of society and is not particular to any racial, ethnic or social group. It is further recognised that in many instances the process of radicalisation is essentially one of grooming by others.

Extremism: The Government has defined extremism in the Prevent strategy as; "vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. We also include in our definition of extremism calls for the death of members of the armed forces"

Safeguarding issues may also be recognised in the specific circumstances identified below:

• Child pornography and the Internet

• Forced marriage of a child

• Young carers

• Looked after children and children living away from home

• Pregnancy of a child

• Self-harming and suicidal behaviour

• Bullying

This list is not exhaustive.

Operation Encompass

Operation Encompass operates in the majority of police forces across England. It helps police and schools work together to provide emotional and practical help to children. The system ensures that when police are called to an incident of domestic abuse, where there are children in the household who have experienced the domestic incident, the police will inform the key adult (usually the designated safeguarding lead) in school before the child or children arrive at school the following day. This ensures that the school has up to date relevant information about the child's circumstances and can enable support to be given to the child according to their needs. Police forces not signed up to operation encompass will have their own arrangements in place

APPENDIX 5: Safeguarding and Guidance for Remote Teaching and Learning

WHAT ARE THE SIGNS TO LOOK FOR?

- **Poor attendance –** learners are expected to attend their online lessons and/or produce assessments. Poor attendance to online learning can look like:
    - Learner isn't logging on Teams/Google Classroom
    - Learner isn't replying to emails/texts from the teaching and pastoral team - Learner isn't engaging with the work set by teaching team.

- **Hostile home environment** – to allow us to check on our learners' wellbeing appropriately, video calls or phone calls are essential. Staff should look out for:
    - Busy background noise i.e. Shouting, screaming, crowd noises.
    - Student refusing to answer phone calls or video calls – can be a sign of feeling unsafe with family/carers around.

- **Poor mental health and wellbeing –** although we are missing essential cues from face-to-face interactions, mental health struggles can be spotted in:
    - Student sound as if woken up by phone call, regardless of time of the day
    - Student isn't keeping in touch with friends and family regularly
    - Student gets overwhelmed by assignments and miss deadlines often
    - Student missing appointments for 1:1 with teaching/pastoral team regularly

GOOD PRACTICE TO SAFEGUARDING:

- **Attendance –** staff should attend appointments and classes on time to keep the students engaged.

- **Work/Home environment –** lessons should take place in a quiet room, ideally with bare walls. Avoid interruptions from family members, and family photos on walls, as it can trigger strong emotions in some of our learners.

- **Online interactions –** staff must **never** share their personal details with students - Always use college/work email to make contact with students and external agencies - Use Teams or Google Meetup to call students.
    - If using personal phone to make calls, set phone on Hidden caller ID.

- **External Speakers**
    - Staff must ensure they follow the External Visitors Guidance when inviting external speakers to talk with students on line.
    - Under no circumstances should a speaker be left unsupervised with a group of students
    - Staff must ensure that the session is recorded

- **Report any safeguarding concern to Safeguarding Officer as promptly as possible.**
    Give as much detail as possible, asking yourself the following questions:

- **What are we worried about?**
- **What is working well?**
- **What needs to happen?**

If you think that a student is a high risk of harm, **get in touch directly with the safeguarding team: 01992 707027or email at safeguarding@capel.ac.uk**

APPENDIX 6: How to Report a Concern

How to Report a Concern

If you have a concern that a young person or a vulnerable adult is being abused, or is at risk of being abused, it is important that the steps below are followed:

NAME	CAMPUS	TEL	ROLE
Rochelle Arthoon/ Simon Caffrey	Gunnersbury Park		Designated Safeguarding Officer and student counsellor
James Bryon	Crystal Palace		
Caroline Howard	Enfield	Ext 1172 / 07894 169293	Designated Safeguarding Officer and Student Mentor
Jo Lam	Enfield	Ext 1302 / 07526326870	Designated Safeguarding Officer
Tracey Gordon	Enfield	Ext 1172 / 07894 169293	Designated Safeguarding Officer and Student Mentor
Luiza Negura	Enfield	Ext 1392 /07917081836	Designated Safeguarding Officer and Counsellor
Nichola Williams	Enfield	Ext 1392 07485 342 525	Designated Safeguarding Officer and Counsellor
Jeremy Wilson	Crystal Palace		Designated Safeguarding Officer and Mentor
Jeremy Wilson	Mottingham		Designated Safeguarding Officer and Mentor
Andrew Jackson	Regents Park	Ext 1401 /07872062026	Designated Safeguarding Officer
Cynthia Amos	Enfield	Ext 1332 / 07973844744	Deputy Designated Safeguarding Lead Wellbeing Manager
Amanda Evans	Enfield	Ext 1339 01992 707207 07939049033	Designated Safeguarding Lead
Heather Marks	Enfield	Ext 1103/ 07545 208 892	Strategic Designated Safeguarding Lead

- Immediately contact a member of the safeguarding team on 01992 707027 or) or the dial the campus Designated Safeguarding Officer leaving your name and contact details, availability, the nature of your concern and if appropriate the date you were notified of the concern.
- Email safeguarding@capel.ac.uk
- Complete a confidential comment on pro monitor
- Safeguarding will then carry out any further investigations before entering the concern on MyConcern and where appropriate will refer the case for internal support or to an external agency.
- It is important to report any concern immediately.

Please note:
- The Safeguarding Team line operates between 08:30 – 17:00. After 17:00 all messages left will be actioned the following day

- In case of an emergency in out of office hours call the emergency services (999) and also report the matter via the Safeguarding Line on 01992 707027.

Keeping You Safe

All staff must observe appropriate professional boundaries with all students at all times in accordance with the Colleges Code of Conduct and Ethical Framework policies. It is compulsory for all staff to confirm they have read, understood and agree to abide by the contents of the agreement. In summary:

- Staff must not give their phone number, email or any other social networking information to a student. Staff should not disclose personal information to students, give them gifts, provide a lift, touch without consent and should behave in a way which is professionally appropriate at all times.
- Action will be taken by the College should any staff member behave in a way which indicates that appropriate boundaries have not been observed.
- Staff must immediately report the inappropriate conduct or behaviour of a member of staff (or volunteer) towards a student to the Strategic Designated Safeguarding Lead for Allegations against Staff and Volunteers
- Action will be taken by the College should any staff member behave in a way which indicates that Appropriate boundaries have not been observed.

General Guidance

Although it may be tempting, no member of staff should ever guarantee to a student that they can keep a concern raised as confidential. If there is any suggestion that the student may be suffering or at risk of suffering harm it must be made clear to the student that the appropriate Centre based Safeguarding Officers will be contacted in order to keep them safe.

If a student discloses that they are being physically or sexually abused or exploited it is important for staff to ask questions for clarification only. This is to avoid asking questions to generate a particular answer.

All staff are expected to be familiar with the following protocol for inviting external speakers, groups or organisations to speak to Students either on site or remotely.

- Organiser (e.g. Lecturer) must read the External Visitor's Guidance and complete an External Visitor's Risk Assessment

APPENDIX 7: Roles and Responsibilities

Safeguarding is everyone's responsibility, and all staff carry out safeguarding roles and responsibilities. This appendix sets out the statutory roles and responsibilities of staff that hold specific safeguarding responsibilities reflected in their job descriptions and for which they are accountable.

All Staff

- Fully comply with the requirements of the College's safer recruitment training.
- Safeguard students' wellbeing and maintain public trust in the College and in the teaching profession as part of the professional standards for teaching.
- Adhere to the College's Safeguarding, Child Protection and Adults at Risk Policy and ensure that they understand the reporting procedures in the college.
- Ensure they complete Safeguarding Induction training and ongoing training events, briefing and workshops that they are requested to attend.
- Comply with the College's staff Code of Conduct and Ethical Framework policies at all times that makes clear the appropriate boundaries for communicating with students and their families.
- Remain vigilant and report any safeguarding concerns **immediately** following the procedures in place at the college.
- Report any concerns immediately to the **Designated Safeguarding Officer and for Allegations against Staff to the DeputyPrincipal/ Strategic Designated Safe Guarding Lead and Central Support** regarding inappropriate behaviour or conduct of a member of staff to a student.
- Do not promote any form of extremist or radical view that endorses or support the use of violent or non-violent acts.

Principal and Chief Executive Officer (Principal)

- The Principal is responsible for ensuring that the Safeguarding, Child Protection and Adults at Risk policy and procedures adopted by the Governing Body are effectively implemented, followed by all staff and monitored for quality assurance in each of the colleges.
- It is the Principal's responsibility to allocate sufficient resources and time to enable the College's Strategic Safeguarding Lead and the Operational Safeguarding Leads to effectively carry out their lead responsibilities and ensure that relevant staff are able to attend strategy discussions, child protection, child in need conferences and other interagency meetings and to contribute fully to the assessment of students.
- The Principal is responsible for ensuring that all staff are confident in their safeguarding role and able to raise concerns about poor or unsafe practice regarding students, and that concerns will be addressed sensitively and in a timely manner in accordance with the College's Whistle Blowing policy. We recognise that it is not the responsibility of students to raise concerns. It is the responsibility of all staff to share concerns about the actions or attitudes of colleagues with the Principal who will deal with the concerns appropriately.

Strategic Designated Safeguarding Lead

The Strategic Safeguarding Lead will ensure the College meets its statutory duty by:

- Ensuring the College safeguarding and child protection and adults at risk policies are up to date and consistent with the appropriate laws and regulations and that policies are reviewed annually.
- Being appropriately trained and undertaking regular training updates to ensure they are able to act as a source of support and expertise to the College.
- Overseeing the implementation of the policy and procedures, and ensuring there is appropriate record keeping across the College.
- Ensuring all staff receive appropriate safeguarding training at induction and refresher safeguarding training, including all Senior Leadership Team members and governors
- Ensuring that there are appropriate referral and liaison mechanisms to external partners and agencies, particularly the local authorities.
- Ensuring there is appropriate support, monitoring and liaison with partner organisations for young people with child protection plans.
- Ensuring that College staff receive appropriate safeguarding training and appropriate training is provided for Governors.
- Ensuring that safeguarding issues are brought to the attention of the governing body as required.

Designated Safeguarding Lead

This person will be responsible for:

- Being appropriately trained and undertaking regular training updates to ensure they are able to act as a source of support and expertise to the College.
- Overseeing the implementation of the policy and procedures and ensuring there is appropriate record keeping across the College.
- Ensuring all staff are vigilant to harm and abuse, are able to identify those children for whom there are child protection concerns and can make appropriate referrals
- Ensuring that there are appropriate referral and liaison mechanisms to external partners and agencies, particularly the local authorities.
- Ensuring there is appropriate support, monitoring and liaison with partner organisations for young people with child protection plans.
- Ensuring that there are appropriate referral and liaison mechanisms to external partners and agencies, particularly the local authorities.
- Ensuring there is appropriate support, monitoring and liaison with partner organisations for young people with child protection plans.
- Providing the Strategic Designated Safeguarding Lead and SLT with reports on safeguarding alerts and cases as required.
- Providing a termly Safeguarding Report to the respective College Education Board and the Training Board.
- ensuring all staff receive appropriate safeguarding training at induction and on an annual basis refresher safeguarding training
- Ensuring the College offers a safe environment for staff and students to learn and work
- Ensuring there is appropriate arrangements in place to identify, follow up and report on Missing Children.
- Ensuring College Procedures as outlined in Part 2 of the Policy are reviewed each term and updated to reflect any changes of staff including Local Authority contacts.
- Ensure that there are effective filtering and blocking systems to monitor online usage and that these reports are monitored and actioned as appropriate when on line activity is considered likely

to cause harm. This includes ensuring that SLT are aware of any concerns raised through online usage

Designated Safeguarding Officers

These posts will act as the first line source of support and guidance on all matters of child protection and safeguarding within the College at each Campus.

Staff must report any concerns to a Designated Safeguarding Officer (DSO). Staff are also able to discuss safeguarding, child protection and adults at risk issues with a DSO.

They are responsible for:

- Ensuring there is a system for monitoring and recording concerns about students at an early stage which is implemented across the College and adhered to by all staff.
- Managing child protection concerns and making referrals to Children's Social Care for the borough in which the child is resident when it is appropriate to do so and seeking advice and guidance on these matters when appropriate.
- Attending and providing reports to 'child in need' meetings, child protection conferences and core meetings and contributing to child protection and 'child in need' plans.
- Monitoring the attendance and progress of students who are the subject of 'child in need' or child protection plans and implementing the College part of the plan.
- Informing Children's Social Care of any proposed change of College of a child who is subject to a 'child in need' or child protection plan and alerting them if a child who is subject to a protection plan is absent from College without reasonable justification.
- Ensuring that relevant information about students is shared with staff on a 'need to know basis'.
- Maintaining accurate child protection records which are held securely and confidentially.
- Ensuring all staff are aware of the need to record concerns about students and enabling them to do this as part of a College wide process, such as in tutorial records, individual/personal learning plans. These would include bullying and racial issues.
- Ensuring complete and accurate records are forwarded to receiving Colleges, such as tutorial records and the individual/personal learning plan.
- Ensuring students, parents and carers have access to the Colleges safeguarding policies and procedures.
- Having a working knowledge of the role and function of the appropriate Safeguarding Children Board.
- Training for staff with designated child protection and safeguarding responsibility occurs every year.
- Undertaking the role of LAC Designated Teacher, as outlined in the revised DfE (2018)

'https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/683561/The_designated_teacher_for_looked-after_and_previously_looked-after_children.pdf

APPENDIX 8: Supporting Students

The College recognises that a student who is abused or neglected may find it difficult to develop and maintain a sense of self-worth. The College also recognises that a student may feel helpless and humiliated and may blame themselves for what has or is happening to them. The College helps to provide a vital source of stability in the life of a student who has been abused or is at risk of harm. The College recognises that the behaviour of a student in these circumstances may range from that which is perceived to be 'normal' to aggressive or withdrawn.

The College also acknowledge that young people/adults at risk who are affected by abuse or neglect, may demonstrate their needs and distress through their words, actions, behaviour, demeanour, academic work or other young people. The College has a strong commitment to an anti-bullying and harassment policy and will consider all coercive acts and inappropriate child-on-child/student-on-student behaviour and unlawful sexual activity within a Child Protection context.

The College's aim is to support students by:

- Encouraging a sense of self-worth and assertiveness whilst not condoning bullying and aggression. Bullying in itself may result in the threshold of significant harm being met and we take seriously our responsibility to challenge bullying behaviours in accordance with our Student Code of Conduct; all allegations of bullying must be recorded.
- Promoting a caring and safe environment for all our students.
- Providing an environment where students are able to make positive relationships with staff and are better able to talk to staff about their lives; in so doing staff 'hear the voice of the child'.
- Providing opportunities through the curriculum for students to learn strategies to protect themselves, ask for help and support and gain confidence in standing up for their rights and valuing and respecting others. e.g. through awareness raising activities and workshops including sexual health and relationship education, anti-bullying, drug and alcohol support, gang prevention and health and wellbeing.
- Working in partnership with other services involved in safeguarding students and notifying Children's Social Care or the Adults at Risk Team as soon as there are significant concerns about a student.

Safeguarding is promoted through a students' course (tutorial, enrichment and curriculum) and students are encouraged to recognise their own responsibilities to safeguard themselves and others. Guidance and support for students is available through a range of student support services. These aims are underpinned by the College's Policies detailed in **Appendix 1.**

The College will also be vigilant to the attendance and particular needs of students who might be at risk due to:
- Female genital mutilation (FGM)
- Forced marriage
- Radicalisation
- Involvement in gang activity and or serious violence activities
- Relationship abuse
- Sexual exploitation and bullying linked to race, gender or sexual orientation.
- Risk of offending

- Homelessness
- Refugee/asylum seeker status
- The effects of substance abuse within the family
- Being Children in care
- Child criminal exploitation
- Mental health
- Honour based abuse
- Requiring a social worker

Please refer to **Appendix 9** Local and National Safeguarding Priorities **Appendix 10:** The Prevent Duty/Radicalisation.

All staff will be made aware of children missing from or absent from education and how this can act as a vital warning sign of a range of safeguarding possibilities. This may include abuse and neglect, which may include sexual abuse or exploitation and child criminal exploitation. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation or risk of forced marriage. Early intervention is necessary to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child going missing in future. Staff will be made aware of their College's unauthorised absence and children missing from education procedures. Attendance will be closely monitored and where children are missing from education through habitual non-attendance or one-off absence, this will be followed up by contact with the learner, carer or parent and reasons for the absence recorded on pro monitor

Students with Learning Difficulties and/or Disabilities and those with medical needs. Research suggests that students with disabilities and/or learning difficulties are more vulnerable to abuse. The risks may be increased by their need for practical assistance and physical dependency including intimate care which may be delivered by a number of different carers, by possible communication difficulties and lack of access to strategies to keep themselves safe, or by the increased risk that they may be socially isolated or may not understand that they are being abused.

The College acknowledges the legal obligation to support students with medical needs and will work with students, parents and the health authorities to implement health care plans that support the attendance, inclusion and attainment of students with acute or chronic medical conditions.

Staff who work with students in any capacity must be particularly aware of and sensitive to how the effects of abuse or harm may present and be able to pick up on any changes in behaviour or presentation that might indicate a concern that should be shared immediately with the Colleges Designated Safeguarding Officers or in their absence another member of the safeguarding team.

If a student has particular needs which require intimate care or the administration of medication, a meeting will be held with the student, their parents, carers and relevant health professionals to ensure that an individual support plan is drawn up to meet those needs appropriately. The student's wishes and feelings will be taken in to account and respected throughout this process.

Students aged under 16 who are taken to **Hospital** must be accompanied by a member of staff. The member of staff must make direct contact with the parent /carer/relative to make them aware of the situation. It is expected that the member of staff will accompany the student in the ambulance, and remain at the hospital until the parent/carer/relative arrives. If a student age 16-18 is taken to hospital,

the member of staff must make direct contact with the parent carer/relative to make them aware of the situation. As a general rule the member of staff is not required to accompany the student in the ambulance, where parent/carer/ relative has been made aware of the situation.

Where the student is over 18 and is a vulnerable adult the member of staff must also make direct contact with the parent /carer/ relative to make them aware of the situation. It is expected that the member of staff will accompany the student in the ambulance and remain at the hospital until the parent/relative arrives.

In all cases, an appropriate Designated Safeguarding Officer or in their absence a Designated Lead should be made aware as soon possible of the situation.

Staff must report any students who are living alone or without parental or guardian support to the Safeguarding team.

If a member of staff becomes aware of a student under the age of 18 who is 'privately fostered' and are cared for by someone other than a parent or close relative (e.g. step parents, siblings, siblings of a parent and grandparents) for 28 days or more must make a referral to the appropriate Designated Safeguarding Officer or in their absence a Designated Lead who will notify Children's Social Care if:

- They become aware of a private fostering arrangement which is not likely to be notified to the local authority
- They have doubts about whether a child's carers are actually their parents, and there is evidence to support these doubts, including concerns about the child's welfare

Further information about private fostering arrangements can be found at www.baaf.org

The College acknowledges that some students are likely to be young carers whose responsibilities at home may adversely affect their education **Appendix 10.** The College works to ensure that all students are given every opportunity to achieve their chosen qualification.

APPENDIX 9: Local and National Priorities

It is acknowledged some of the areas below have become more prominent such as Child Sexual Exploitation (CSE), The College has in place (See 1.1) a range of initiatives to help students who may be experiencing any of the vulnerabilities outlined.

Modern Day Slavery

Modern Day Slavery is a crime and a violation of a person's fundamental human rights. This can be done through bullying, harassment and coercing a person into doing something they do not want to do. Modern Day Slavery, takes on various forms such as forced labour, human trafficking, and is closely linked to Gangs, Children Missing in Education, Child Criminal Exploitation and Child Sexual Exploitation. Colleges have had a duty since November 2015 to report anyone they believe is a suspected victim of slavery or human trafficking.

Trafficked and Exploited Students

A trafficked student is coerced or deceived by the adult who brings them into the country.

Trafficked students are denied their human rights and are forced into exploitation e.g. domestic servitude, forced marriage, criminal activity, begging, benefit fraud, acting as a drug mule, sweatshop or restaurant work. Students may appear to submit willingly through fear for themselves or their family, because their parents have agreed to the situation or because of bribes. Recognition of trafficked and exploited students will normally rely on a combination of general signs of abuse and neglect and issues concerned with the student's immigration status. These students may not be in possession of their own travel documents, be excessively afraid of being deported, be in possession of false papers, being cared for by an adult who is not their parent, presenting with a history of missing links and unexplained moves. Staff should make a referral to their Safeguarding Team if they suspect a student is a victim of modern slavery or human trafficking.

Children Missing in Education

Some young people are pushed away from their home by factors that make an environment difficult to live in, such as problems at home, difficult relationships, family breakdown and maltreatment or abuse, problems at the College including bullying and personal problems including mental health issues. Other young people are pulled away to be near friends and family or following grooming by adults for sexual exploitation or trafficking.

The College will support students by enabling them to understand the dangers of running away and encourage them to seek support rather than run away; some students run away because they feel there is no other option. Students need to know where they can access help if they are thinking of running away and what alternatives are open to them. As a College we are well placed to advise young people about the dangers of running away and to point them to available support. If staff become aware of a young runaway, they should inform their Safeguarding Team.

Honour–based Abuse (HBA) including Forced Marriage and Female Genital Mutilation

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 female genital mutilation

(FGM), forced marriage, and practices such as breast ironing. Abuse committed in the context of preserving "honour" often involves a wider network of family or community pressure and can include multiple perpetrators.

It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take. All forms of HBA are abuse (regardless of the motivation) and should be handled and escalated as such.

Forced Marriage

A 'forced' marriage is distinct from a consensual 'arranged' marriage because it is without the valid consent of both parties and where duress is a factor. A student who is forced into marriage is at risk of significant harm through physical, sexual and emotional abuse. Information about a forced marriage may come from the student themselves, or the student's peer group, a relative or member of the student's local community or from another professional.

Forced marriage may also become apparent when other family issues are addressed, e.g. domestic violence, self-harm, child abuse or neglect, family/young person conflict, a student absent from the College or a missing/runaway. Forced marriage may involve the student being taken out of the country for the ceremony, is likely to involve non- consensual and or under-age sex and refusal to go through with a forced marriage has sometimes been linked to 'honour killing'. Young men as well as women are victims of forced marriage. Honour based abuse is an ancient cultural tradition that encourages violence towards family members who are considered to have dishonoured their family. It is rooted in domestic abuse and is often a conspiracy of family members and associates meaning victims are a risk from their parents and families.

Staff should respond to suspicions of a forced marriage or honour based abuse by making a referral to their respective Safeguarding Team. Staff should not treat any allegations of forced marriage or honour based abuse as a domestic issue and send the student back to the family home. It is not unusual for families to deny that forced marriage is intended, and once aware of professional concern, they may move the student and bring forward both travel arrangements and the marriage.

For this reason, staff should not approach the family or family friends, or attempt to mediate between the student and family, as this will alert them to agency involvement.

Further information and advice can be obtained from the Forced Marriage Unit www.fco.gov.uk/forcedmarriage or 020 70080151 and the Honour Based Violence Helpline 0800 599 9247.

Female Genital Mutilation

It is illegal in the UK to subject a child to female genital mutilation (FGM) or to take a child abroad or aid or abet someone to take a child out of the country to undergo the procedure – Female Genital Mutilation Act 2003.There is a statutory duty (section 74 of the Serious Crime Act 2015) for teachers to report to the police incidences where they suspect that FGM has occurred to a girl under the age of 18. Despite the harm it causes, FGM practicing communities consider it acceptable to protect their cultural identity.

The age at which girls are subject to FGM varies greatly from shortly after birth to any time up to adulthood. The average age is thought to be 6 - 12 years but it is also thought that the age at which girls are mutilated is dropping.

Although the age of students at Capel is such that they are not necessarily in the 'high risk' category for FGM, a student may disclose that she is at risk of FGM, has suffered FGM or that she has a sister or family member who is at risk of mutilation.

Staff should be alert to the following indicators:

- The family comes from a community that is known to practice FGM
- A student may talk about a long holiday to a country where the practice is prevalent.
- A student may confide that she or a sister or family member is to have a 'special procedure' or to attend a special occasion
- A student may request help from a teacher or another adult
- Any female student born to a woman who has suffered FGM or has a sister or relative who has been subjected to FGM must be considered to be at potential risk. Any information or concern about a student or member of her family being at risk of FGM must be reported to Safeguarding Team and will be treated as an immediate child protection referral to the student's home borough.

Domestic Abuse

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

- Psychological
- Physical
- Sexual
- Financial
- Emotional

Controlling behaviour is: a range of acts designed to make a person subordinate and/or dependent by isolating them from sources of support, exploiting their resources and capacities for personal gain, depriving them of the means needed for independence, resistance and escape and regulating their everyday behaviour.

Coercive behaviour is: an act or a pattern of acts of assault, threats, humiliation and intimidation or other abuse that is used to harm, punish, or frighten their victim.

Forced marriage, 'honour-based abuse' and female genital mutilation are included in this definition.

It important to note that the definition includes young people aged 16 or over, therefore staff must be vigilant to domestic violence within young people's relationships and refer this as a child protection concern to the CPVA.

Living with domestic violence is a form of emotional abuse and is included in the definition of emotional abuse as, 'seeing or hearing the ill treatment of another'. If staff are aware that a student is witnessing, hearing, living with or experiencing domestic violence, they should inform a Safeguarding

Officer or in their absence a Designated Lead, who will in turn refer the matter to or to Children's Social Care for the borough in which the student lives.

Gang Violence and Gang Grooming

(Adapted from "Safeguarding children affected by gang activity and/or serious Youth violence"– London safeguarding children's board section14.5) www.londonscb.gov.uk

As part of the teaching and tutorial process staff are well placed to pick up signs of antisocial behaviours, aggression, and bullying and gang activity amongst young people and identify those at risk of harm as victims and/or the perpetrators. Poor academic achievement is one of the most consistently- reported risk factors found to increase the likelihood of violent behaviour and crime. If necessary work collaboratively with external bodies such as Reality around Gangs.

Child Criminal Exploitation (CCE)

CCE is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial or other advantage of the perpetrator or facilitator and/or (c) through violence or the threat of violence. The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact; it can also occur through the use of technology.

CCE can include children being forced to work in cannabis factories, being coerced into moving drugs or money across the country (county lines, see page 85 for more information), forced to shoplift or pickpocket, or to threaten other young people.

Some of the following can be indicators of CCE:
* children who appear with unexplained gifts or new possessions;
* children who associate with other young people involved in exploitation;
* children who suffer from changes in emotional well-being;
* children who misuse drugs and alcohol;
* children who go missing for periods of time or regularly come home late; and
* children who regularly miss school or education or do not take part in education.

Child Sexual Exploitation (CSE)

'Sexual exploitation of children and young people under 18 involves exploitative situations, contexts and relationships where young people (or a third person or persons) receive something (e.g. food, accommodation, drugs, alcohol, cigarettes, affection, gifts, money) as a result of them performing and/or others performing on them sexual activities. The victim may have been sexually exploited even if the sexual activity appears consensual.

CSE does not always involve physical contact; it can also occur through the use of technology, without the child's immediate recognition; for example, being persuaded to post sexual images on the internet/mobile phones without immediate payment or gain. In all cases, those exploiting the child/young person have power over them by virtue of their age, gender, intellect, physical strength and/or economic or other resources. Violence, coercion and intimidation are common, involvement in

exploitative relationships being characterised in the main by the child or young person's limited availability of choice resulting from their social /economic and/or emotional vulnerability.'

Sexual exploitation may be organised or opportunistic. It may take place when a student is groomed using technology or is encouraged to think that they are entering into a relationship. It may be linked to gang membership. Boys as well as girls are sexually exploited. Young people are vulnerable to sexual exploitation in many ways and the vigilance of staff is key in identifying possible signs or indicators. The Rochdale Serious Case Review into the sexual exploitation of a group of young people highlighted the importance of FE Groups in identifying and meeting the needs of vulnerable young people who might be at risk of this form of abuse.

The CCE indicators can also be indicators of CSE, as can:
- children who have older boyfriends or girlfriends; and
- children who suffer from sexually transmitted infections or become pregnant.

Staff must be vigilant to any signs or concerns that a student may be sexually exploited and report concerns as a matter of urgency.

APPENDIX 10: The Prevent Duty

Under section 26 of the Counter Terrorism and Security Act 2015 (the CTSA 2015), Schools and Colleges have a statutory to prevent young people and vulnerable adults from being drawn into radicalised and extremism by extremists from religious, political and other extremist groups. This is known as the Prevent duty and is seen as part of College's wider safeguarding obligations to protect children and vulnerable adult.

The governments definition of Extremism Radicalisation and Terrorism (these are currently under review by the government).

Extremism is the promotion or advancement of an ideology based on violence, hatred or intolerance, that aims to:

- (1) negate or destroy the fundamental rights and freedoms of others; or
- (2) undermine, overturn or replace the UK's system of liberal parliamentary democracy and democratic rights; or
- (3) intentionally create a permissive environment for others to achieve the results in (1) or (2).

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

2. **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.

3. **Awareness of the Prevent Agenda**
4. All schools and colleges are subject to a duty under section 26 of the Counter-Terrorism and Security Act 2015 (the CTSA 2015), in the exercise of their functions, to have "due regard to the need to prevent people from being drawn into terrorism." This is known as the Prevent Duty.
5. Prevent is one of the four elements of 'CONTEST', the government's counter terrorism strategy. The 4 elements are: Pursue, Protect, Prepare and Prevent. It aims to safeguard people from becoming terrorists or supporting terrorism. The recent Contest 3.0 strategy states "Protecting pupils and students from radicalisation is part of the wider safeguarding duties of teachers, tutors and academics. The Prevent duty requires education providers to have clear policies in place to safeguard students and build their resilience to radicalisation in schools, further and higher education institutions.

6. The Prevent strategy has 3 key objectives:
   • Tackle the causes of radicalisation and respond to the ideological challenge of terrorism
   • Safeguard and support those most at risk of radicalisation through early intervention, identifying them and offering support
   • Enable those who have already engaged in terrorism to disengage and rehabilitate

7. The College has in place an IT Acceptable Use Policy which applies to all use of all IT facilities. We set out in that policy a range of activities that would be of concern to us including issues that arise from the FE statutory duty under the Counter Terrorism and Security Act 2015. Partnership Working. The College places a priority on working with partners to ensure we provide a safe environment. We work in

collaboration with our local HE and FE Prevent Coordinator and local police and key external agencies to share information, intelligence and best practice.

8. External Speakers and Events Existing procedures for the management of external speakers and events are outlined in the Guest Speaker Protocol.

9. Staff training All staff receive Prevent awareness training as part of their induction and three yearly refreshers.

10. Student Awareness Mandatory components of our tutorial programme include British Values, e-Safety,. This is also included in our Induction modules that all students are expected to complete. Posters have been distributed around the College to raise students' awareness of what to do if they have any concerns as well as posters on the ways British values are embedded in different aspect of the student experience at the college.

11. Equality and Diversity: Our work on Equality and Diversity within the curriculum and Enrichment contribute to good community relations and reduces the risk of radicalisation.

12. Prevent Duty Risk Assessment and Action Plan: In order to effectively support the implementation of the Prevent agenda the College has developed a Prevent Action plan which is reviewed and updated termly by the DSL and shared with SLT.

Understanding and recognising risks and vulnerabilities and radicalisation

13. Background factors combined with specific influences such as family and friends may contribute to a child's vulnerability. However, it is possible to protect vulnerable people from extremist ideology and intervene to prevent those at risk of radicalisation being radicalised. As with other safeguarding risks, staff should be alert to changes in behaviour which could indicate that they may be in need of help or protection. Staff should use their judgement in identifying students who might be at risk of radicalisation and act proportionately which may include the designated safeguarding lead making a referral to the. There is no single way of identifying whether a student is likely to be susceptible to an extremist ideology or radicalisation.

14. The ways in which young people can be influenced include

    • via family members or friends
    • direct contact with extremist groups
    • contact via the internet.

15. Examples of extremist causes that have used violence to achieve their ends include:
    • animal rights
    • the far right
    • internal terrorism
    • international terrorist organisations

16. Additional indicators for vulnerability to radicalisation:
    • family tensions
    • sense of isolation
    • migration
    • distance from cultural heritage

- experience of racism or discrimination
- feeling of failure.

17. Other behaviours to be aware of:
    - involved with a new group of friends
    - searching for answers to questions about identity, faith and belonging,
    - possessing extremist literature
    - advocating violent actions
    - changing behaviour and language
    - seeking to recruit others to an extremist ideology

18. It is important to note that children and young people experiencing these situations or displaying these behaviours are not necessarily showing signs of being radicalised. There could be many other reasons for the behaviour, and it is important to be cautious in assessing these factors to avoid inappropriately labelling or stigmatising individuals because they possess a characteristic or fit a specific profile.

19. Channel is a voluntary, confidential support programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into radicalisation and extremism. Prevent referrals may be passed to a multi-agency Channel panel, which will discuss the individual referred to determine whether they are vulnerable to being drawn into terrorism and consider the appropriate support required. A representative from the school or college may be asked to attend the Channel panel to help with this assessment. An individual's engagement with the programme is entirely voluntary at all stages.

20. The College will fulfil its obligations under the 'Counter Terrorism and Security Act' (2015), to prevent young people and vulnerable adults from being drawn into radicalised and extremism by extremists from religious, political and other extremist groups through positive curriculum delivery building self-esteem and self-belief. **In addition, we will:**

    - Train staff to recognise radicalisation and extremism
    - Refer vulnerable people to 'Channel' risk assessment Panels ⸢SEP⸣
    - Prohibit extremist speakers and events ⸢SEP⸣
    - Manage access to extremist material ⸢SEP⸣
    - Have regard to published DfE advice ⸢SEP⸣
    - Ensure we have a Prevent Risk assessment based on the CTLP that is shared with staff
    - Ensure appropriate CPD to staff is relevant and up to date
    - Tackle the ideologies associated with radicalisation and extremism

21. Staff have a responsibility to familiarise themselves with the Prevent Duty and British/Our Values and undertake the relevant training provided by the College.

22. The College recognises the positive contribution it can make towards protecting its students from radicalisation to violent extremism. The College will continue to empower its students to create communities that are resilient to extremism and protect the wellbeing of particular students who may be vulnerable to being drawn into violent extremism or crime. It will also continue to promote the development of spaces for free debate where shared values can be reinforced.

23. Radicalisation is the process by which individuals come to support terrorism or violent extremism. There is no typical profile for a person likely to become involved in extremism, or for a person who moves to adopt violence in support of their particular ideology. Staff should use their professional judgment and discuss with other colleagues if they have any concerns:

24. If staff have any significant concerns about a student beginning to support terrorism and/or violent extremism they should discuss this immediately with the Safeguarding Team and DSL.

APPENDIX 11: Young Carers

The College works to ensure that all students are given every opportunity to achieve their chosen qualification. The College acknowledges that some students are likely to be young carers whose responsibilities at home may adversely affect their education. The College has in place a range of initiatives to help students who may become a carer.

What are young carers?

Young carers are children or young people under 18 who are responsible on a regular basis for a family member who has an illness or a disability. Whilst within many families, children and young people helping out around the house is seen as a normal part of family life, young carers have added responsibilities which may include sole or main responsibility for:

- Emotional and physical support for the family member
- Carrying out their personal care (bathing, dressing and feeding)
- Administrating medication
- Taking to medical appointments
- Looking after younger siblings
- Financial support to the family

How can you identify a young carer?

- The student seems tired and lacks concentration
- Illness or disability in the family
- Frequent lateness or absence
- Poor academic achievements, failure to complete assignments on time
- Isolation or difficulty in forming friendships
- Failure to engage in enrichment activities outside of college
- Behavioural problems
- Victims of bullying
- Parents not engaging with the college, e.g. attending meetings
- Unusual levels of maturity and responsibility

It is important to note that the above includes **possible** indicators that a student might be young carer.

The College's Approach

- The College's Designated Safeguarding Officer will let all new students know who they are and what they can do to help. Each YAC or LAC will be assigned a "trusted" adult from the safeguarding team who will check in on them to ensure that are attending and making good progress as their course progresses
- The College will liaise directly with parents who have mobility and communication difficulties, to provide information on meetings concerning their 16-18-year-old child.
- In the event that a member of staff has a safeguarding concern about a young carer, the concern must be immediately reported to the Safeguarding Team.
- The College will respect the rights of young carers' privacy, only sharing information about the young person and their family on a need to know basis.

APPENDIX 12: Protocols for Online Learning

Online Protocols - Staff

Staff using online technologies for teaching and learning and communication must ensure the following:

1. College policies apply including Safeguarding, Staff Code of Conduct, Ethical Framework and the Student Code of Conduct

2. College staff take part in training/coaching and have the use of Help Guides to ensure the agreed platform is used effectively and safely when setting up and delivery lessons/meetings

3. Staff should maintain professional boundaries and avoid disclosure of personal information

4. Meetings should only be held during normal teaching hours and according to the normally timetabled sessions

5. Staff must dress appropriately for the online lesson

6. When recording or live streaming lessons, make sure staff are in a neutral area where nothing personal or inappropriate can be seen or heard in the background.

7. Staff should consider their location carefully to minimise disruption and consider what is in the background (it is best to blur the background so that your private home is not shared and it is essential when teaching under 19s)

8. Record any live classes and share on Moodle so students unable to attend can catch up.

9. Prior agreement for recording lessons must be obtained prior to recording. Where recordings are made, they should not be uploaded to social media or shared with third parties (exception is Teacher Training partners)

10. The online teaching platform must not be used by the parties for any other purpose than teaching & communication with students/parents/guardians or to carry out other work related duties

11. Images/film/personal details of young people will be stored in accordance with organisational privacy policies and the Data Protection Act.

12. Online 1:1's/tutorials must be planned and communicated with the student and their parent/guardian (for under 18's) before the event and information added to ProMonitor in Student Meetings as Online Tutorial

13. Online lessons must only use College email addresses

14. If parents do not give permission students will join session with no camera

Section Two - Online Protocols – Students

1. Where possible all students should set up the home computer in a quiet space

2. Under 19 students to set up the home computer in a quiet yet shared space, or at least a space that can be monitored by parents/guardians

3. Student must dress appropriately for the online lesson

4. On Line lesson must only use College email addresses

5. When you log onto the College eLearning platform (MS TEAMS, Google or Moodle) on or off site, you are agreeing to The College ICT Acceptable Use policy and statement when you enrol. This is set out in the Student Handbook. Please be aware that the safe use of ICT is monitored on college equipment for all learners' safety.

6. We ask that you do not disclose your location online and not to give away personal details for example in a chat facility – whilst your teacher will explain the importance of this to you, it is to safeguard you.

7. Where lessons are recorded, they must not be shared with third parties or uploaded to social media without consent and organisational approval.

8. There is to be no live streaming of online lessons

9. Do not take photos of others while you are engaged in learning including using photos online in any context unless directed by your teacher.

10. Do not share the online lesson meeting links with anyone

11. Students know how to report if they have an issue or a concern about the sessions

12. The online learning platform must not be used by the parties for any other purpose than learning e.g. sharing photos or general messaging.

13. Please keep password login safe and do not disclose them to anyone.

14. Always conduct yourself in a professional manner

15. Respecting others' work and property online.

16. Any defamatory, offensive or illegal material aired online by the Student, or inappropriate behaviour by the student, will result in disciplinary and intervention as detailed in the Student Code of Conduct.

Section Three - for students under 19 years of age

Process sending Permission Request

1. This <u>must be</u> sent out prior to using 2-way web cam for teaching & learning
2. Teacher to email Permission Request to parent/guardian
3. Parent/guardian to email response back to Teacher which can be accepted as agreement
4. Teacher to add a note to ProMonitor

Parent/Guardian Permission for Online Learning

Dear Parent/Guardian,
The college has put a number of interventions and safeguards in place to protect your daughter/son when learning online.

The College requests that you provide permission for your daughter/son to take part in on line learning using two way web cam functionality.

Student name	
Vocational School or Course name	
Please sign to give consent for: • *Home devices can be used for online learning* • *Recording of sessions and for the college to store recordings on college only systems for this academic year.* • *Any Safeguarding concerns to follow the Student Safeguarding process* *I give consent for my daughter/son to take part in two way on line learning*	
Parent/Guardian Name	
Parent/Guardian Signature	
Date	

APPENDIX 13: Suicide Safety Plan

Suicide
Safety
Plan

When thoughts of suicide are overwhelming, staying safe for even short periods takes a great deal of strength. This plan is to use during those crisis times.
It is not a plan of how to rid yourself of thoughts of suicide. This plan looks at staying safe for now so that you still have the chance to get through the moment and access long-term support. Thoughts and feelings can change; it does not mean you will feel like this forever.
Let us concentrate on what you can do right now to give your thoughts and feelings the opportunity to change.

Reasons to stay safe?

We understand that you feel suicidal right now, but can you think of any reasons to live.

Are there any animals or people that you feel are worth living for?

Do you have a plan of how you are going to do it?

Do you hope that things may change?

Do you want to stay alive just for right now?

What can you do right now that will keep you safe?

What coping strategies can you use?

What has worked in the past?

Is there anywhere you can go that feels safe?

Making your environment safer

> **What can you do to make it harder to put into action any plans you might have for suicide?**
>
> **Where can you put things you could use to harm myself so they are harder to get to if you get overwhelmed?**
>
> *This does not mean having to get rid of them forever. It is because I am looking at staying safe right now, and if these things make it harder for me to do this, I want to make it harder to use them. This will give me time to connect to that part of me that does not want to die.*

What might make it harder for you to stay safe right now?

> **Do you use any drugs, alcohol or medication to cope?**
>
> **If you have acted on thoughts of suicide before, what made it harder to stay safe that you might need to consider while staying safe today?**
>
> **Do you have any mental health concerns or symptoms that make it harder to stay safe? How can we help with these?**

Checklist:

- **Ensure the student is in a safe place & not alone**

- **Discuss with another member of the Safeguarding Team and if you are their mentor/counsellor then preserve the relationship and ensure another safeguarding officer to contact the NOK**

- **Contact Next of Kin (NOK) or if the student does not want the NOK contacted then ask if there is another person we can speak to**

- **Note there is no age limit when informing the NOK**

- **Contact external agencies:**
    - **Social Worker**
    - **Social Services**
    - **Mental Health Team**
    - **CAMHS/Psychiatrist/GP**
    - **MASH**

- **Call 999**
- **Inform DSL**
- **Put on My Concern & the At Risk Register**

Long–term support plan
After staying safe-for-now from suicide, what longer-term support do you want & how might you access this?

What do I need to change for my thoughts of suicide to change?

Where might I start to get any help with this?

What strengths do you have that you can use to keep yourself safe?

What strengths do you have as a person and how might this keep you safe?

Are you creative, Determined, Caring?

Do you have a faith or any positive statements you could use for inspiration?

How can I use this in my plan to stay safe right now?

If I can't stay safe, who is available to help you?

Who has helped you in the past?

Who can you reach out to for help?

- **Your GP**
- **101 for non-emergency support**

- **999 for emergency support**
- **NHS 111 for medical advice**
- **HOPELINEUK (Call 0800 068 4141 or Text 07860 039967)**
- **https://www.stayalive.app**

NHS Mental Health Apps

- **Calm Harm**
- **Catch It**
- **iPrevail**
- **MeeTwo**
- **My Possible Self**
- **SilverCloud**
- **Thrive: Feel Stress Free**
- **Chill Panda**
- **Cove**
- **Cypher**
- **Blue Ice**