



Policy/Procedure/ Guideline:	Safeguarding Children and Vulnerable Adults Policy and Procedures
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Safeguarding Children and Vulnerable Adults Policy

1. Introduction

1.1 At Nelson and Colne College Group safeguarding permeates all aspects of college life and is everyone's responsibility; the college forms part of a wider safeguarding system. In order to fulfil our responsibilities, we adopt a student-centred approach. This means that:

- Safeguarding systems and procedures are oriented around the wishes, feelings and best interests of students;
- We seek to give students a 'voice', listen to what they say, take them seriously and work collaboratively in order to meet their needs.

Our college aims to provide a positive, stimulating, caring and safe environment which promotes the social, physical, emotional and moral development of each student. We work hard to maintain a safeguarding ethos and culture whereby students feel safe and are safe whilst at college.

2. Purpose

2.1 An effective safeguarding policy is one which that provides clear direction to staff and others about expected codes of behaviour in dealing with child protection and vulnerable adult issues. An effective policy also makes explicit the college commitment to the development of good practice and sound procedures. This ensures that child protection and vulnerable adult concerns and referrals may be handled sensitively, professionally and in ways that prioritise the needs of the student.

3. Legislative/Quality Framework

3.1 This policy and procedures have been written and will be implemented in-line with the safeguarding and child protection procedures established by Lancashire Children's Safeguarding Assurance Partnership (<https://www.safeguardingpartnership.org.uk/>). It is also written in accordance with legislation established by the Children Acts 1989 and 2004, the Education Act 2002 and other core legislation and guidance listed in 3.3.

3.2 The protection of vulnerable adults contributes to the wider safeguarding agenda and this policy operates in conjunction with statutory guidance for reporting concerns (<http://www.lancashire.gov.uk/health-and-social-care/adult-social-care/safeguarding-adults.aspx>).

3.3 Additional Legislation and Guidance (please note this list is not exhaustive).

- Working Together to Safeguard Children (2018)
- Keeping Children Safe in Education (2022)
- Sexual violence and sexual harassment between children in schools and colleges (2021)
- What to do if you're worried a child is being abused (2015)
- Information sharing advice for practitioners providing safeguarding services to children, young people, parents and carers (2018)
- Disqualification under the Childcare Act 2006
- Counter Terrorism and Security Act 2015 (inc. the 'Prevent Duty' 2019)
- Modern Slavery Act 2015
- Education inspection framework 2019 (Inspecting safeguarding in early years, education and skills settings 2019)
- Care and Support statutory guidance 2022
- Mental Capacity Act 2005
- Human Rights Act 1998
- Care Act 2014
- ADSS 2005 (Safeguarding Adults National Framework of Standards)
- The Equality Act 2010 (Including the Public Sector Equality Duty)

4. **Scope**

- 4.1 This policy applies to everyone in our college including all students, staff and subcontractors and it should be read, understood and adhered to, alongside the policies and procedures listed in Section 12.

5. **Definitions**

5.1 **Children**

Child(ren) means everyone under the age of 18.

5.2 **Vulnerable Adults**

Vulnerable adults are those 18 years or over who are or may be eligible for community care services, and whose independence and well-being would be at risk if they did not receive appropriate health and social care support.

Adult safeguarding is about preventing and responding to concerns of abuse, harm or neglect of adults.

5.3 Safeguarding & Welfare

National statutory guidance 'Working Together to Safeguard Children' (2018) defines safeguarding and promoting welfare as:

- Protecting children from maltreatment;
- Preventing impairment of children's mental and physical health or development;
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and
- Taking action to enable all children to have the best outcomes

Therefore, 'safeguarding' includes but is about much more than 'child and vulnerable adult protection'. However, all staff are aware of our responsibility to act in order to **protect** children and vulnerable adults from various potential sources and types of harm:

- Neglect
- Physical abuse
- Sexual abuse
- Emotional abuse
- Bullying, including online bullying and prejudice based bullying
- Racist, disability and homophobic or transphobic abuse
- Gender based violence/violence against women and girls
- Child-on-child abuse, such as sexual violence and harassment
- Radicalisation and/or extremist behaviour
- Child sexual exploitation and trafficking
- Child criminal exploitation, including county lines
- Serious violent crime
- Risks linked to using technology and social media, including online bullying; the risks of being groomed online for exploitation or radicalization; and risks of accessing and generating inappropriate content, for example 'sexting'
- Teenage relationship abuse

- Upskirting
- Substance misuse
- Issues that may be specific to a local area or population, for example gang activity and youth violence
- Domestic abuse
- Female genital mutilation
- Forced marriage
- Fabricated or induced illness
- Poor parenting
- Homelessness
- So-called honour-based violence
- Other issues not listed here but that pose a risk to children, learners and vulnerable adults

All staff should be aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. For example, children may feel embarrassed, humiliated, or being threatened. This could be due to their vulnerability, disability and/or sexual orientation or language barriers. This should not prevent staff from having a professional curiosity and speaking to the Safeguarding Team if they have concerns about a child. It is also important that staff determine how best to build trusted relationships with children and young people which facilitate communication.

5.4 What college staff should look out for - Early help

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

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

has special educational needs (whether or not they have a statutory Education, Health and Care Plan);

- has a mental health need;
- is a young carer;
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines;
- is frequently missing/goes missing from care or from home;
- is at risk of modern slavery, trafficking, sexual or criminal exploitation;
- is at risk of being radicalised or exploited;
- has a family member in prison, or is affected by parental offending;
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse;

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

5.5 Abuse

Abuse is a form of maltreatment of a child or vulnerable adult, by another person or persons in a way that causes significant harm, or affects health, development or wellbeing. Somebody may abuse or neglect a child or vulnerable adult by inflicting harm, or by failing to act to prevent harm. Children or vulnerable adults may be abused in a family or in an institutional or community setting, by those known to them or, more rarely, by others (e.g. via the internet). They may be abused by an adult or adults, or another child or children. This also includes child-on-child abuse, sexual violence and sexual harassment.

5.6 Child-on-child Abuse

All staff should be aware that children can abuse other children (previously referred to as peer on peer abuse) and that it can happen both inside and outside of college and online. It is important that all staff recognise the indicators and signs of child-on-child abuse and know how to identify it and respond to reports. All staff should understand, that even if there are no reports in college that it does not mean it is not happening, it may be the case that it is just not being reported. As such it is important if staff have any concerns regarding child-on-child abuse they should speak to their designated safeguarding lead (or deputy).

It is essential that all staff understand the importance of challenging inappropriate behaviours between peers, many of which are listed below, that are actually abusive in nature. Downplaying certain behaviours, for example dismissing sexual harassment as "just banter", "just having a laugh", "part of growing up", or "boys being boys", can lead to a culture of unacceptable behaviours, an unsafe environment for children and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it.

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

- bullying (including cyberbullying, prejudice-based and discriminatory bullying);
- abuse in intimate personal relationships between peers;
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse);
- sexual violence, such as rape, assault by penetration and sexual assault; (this may include an online element which facilitates, threatens and/or encourages sexual violence)

- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse;
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party;
- consensual and non-consensual sharing of nudes and semi nudes images and or videos (also known as sexting or youth produced sexual imagery);
- upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm;
- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

5.7 Sexual violence and sexual harassment

Sexual violence and sexual harassment can occur between two learners of any age and sex. It can also occur through a group of learners sexually assaulting or sexually harassing a single learner or group of learners. Learners who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment.

Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and offline (both physically and verbally) and are never acceptable. It is important that all victims are taken seriously and offered support via the Safeguarding and Welfare Team. Reports of sexual violence and sexual harassment are extremely complex to manage and must be reported directly to the Designated Safeguarding Lead. It is essential that victims are protected; offered support by the Safeguarding and Welfare Team and every effort is made through liaising with curriculum to ensure their education is not disrupted. It is also important that other learners including adult learners and college staff are supported and protected as deemed appropriate by the Designated Safeguarding Lead.

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.

It is important to explain that the law is in place to protect children and young people rather than criminalise them, and this should be explained in such a way that avoids alarming or distressing them.

(refer to NCCG Bullying and Harassment Policy)

6. Roles and Responsibilities

College staff have no investigative role where child and vulnerable adult protection is concerned. This is a matter for police and children's and adult's social care. However, all college staff have a responsibility to provide a safe environment in which children and vulnerable adults can learn and all staff, including volunteers, have a responsibility to act to safeguard and promote children and vulnerable adult welfare.

Some people have specific and/or additional safeguarding responsibilities.

6.1 Governors

Governors take seriously their responsibility under section 175 of the Education Act 2002 to safeguard and promote the welfare of children. Governors ensure they facilitate a whole school or college approach to safeguarding. This means ensuring safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development. Ultimately, all systems, processes and policies will operate with the best interests of the child at their heart. Where there is a safeguarding concern, governors and college leaders will ensure the child's wishes and feelings are taken into account when determining what action to take and what services to provide. Systems should be in place, and they should be well promoted, easily understood and easily accessible for children and vulnerable adults to confidently report abuse, knowing their concerns will be treated seriously, and knowing they can safely express their views and give feedback.

The Governing Body monitors compliance with statutory requirements and identifies areas for improvement. At least annually the Designated Safeguarding Lead (DSL) will prepare a safeguarding report to be tabled at a full Governing Body meeting. Discussions will be recorded and any agreed and/or remedial action(s) documented and followed-through, formally and without delay.

The Governors have a responsibility to:

- The Governing Body must ensure that they comply with their duties under legislation. They must have regard to 'Keeping Children Safe in Education 2022', ensuring that policies, procedures and training in the college are effective and comply with the law at all times.
- The Governing Body should have a senior board level (or equivalent) lead to take leadership responsibility for the college's safeguarding arrangements.
- The Governing body should ensure that there are appropriate policies and procedures in place in order for appropriate action to be taken in a timely manner to safeguard and promote children's welfare.
- Ensure that a senior leader is appointed as the DSL and that this is explicit in the role holder's job description and that there is always cover for this role.

- Ensure appropriate safer recruitment policies in accordance with Part three of KCSIE 2022 are in place
- The designated safeguarding lead should take lead responsibility for safeguarding and child protection (including online safety). This should be explicit in the role holder's job description
- Governing bodies and proprietors should be doing all that they reasonably can to limit children's exposure to risks from the school's or college's IT system. As part of this process, governing bodies should ensure the college has appropriate filters and monitoring systems in place and regularly review their effectiveness.
- Ensure that the DSL and any deputies access and complete appropriate training which is regularly updated in-line with statutory and LSCB guidance.
- Ensure that sufficient resources and time are allocated to enable staff to discharge their responsibilities, including support and supervision as required.
- Ensure all staff undergo safeguarding training at induction, updated regularly in line with Statutory guidance and Local Safeguarding Children Board (LSCB) guidance.
- Ensure appropriate monitoring and recording systems are in place.
- Ensure they undertake and complete their own mandatory training which includes online Level 1 Child Protection, ETF Prevent for Governors and Keeping Children Safe in Education.

A more detailed breakdown of Governor duties is available in KCSIE 2022

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1080047/KCSIE_2022_revised.pdf

6.2 The Principal

The Principal should ensure that:

- The policies and procedures adopted by the Governing Body, particularly concerning referrals of cases of suspected abuse and neglect, are fully implemented and followed by all staff.
- The Principal receives appropriate child protection training which is regularly updated.
- Sufficient resources and time are allocated to enable the staff to discharge their responsibilities which will help to create an environment where all staff and volunteers feel able to raise concerns about poor or unsafe practice in regard to children and will

address any concerns sensitively and effectively in a timely manner in accordance with the agreed whistle blowing policies.

6.3 Designated Safeguarding Lead (DSL) & Deputies

The college Designated Safeguarding Lead is the Deputy Principal Quality and Curriculum: Tracey Baron

During term time the DSL or Deputies will always be available (in college hours) for staff in the college to discuss any safeguarding concerns. The DSL and Deputy DSLs undertake training and refresher training in-line with statutory requirements and CSAP recommendations.

The Designated and Deputy Safeguarding Lead role is described in Keeping Children Safe in Education 2022, Part two and detailed below:

Deputy designated safeguarding leads

All deputies are trained to the same standard as the designated safeguarding lead and the role should be explicit in their job description. Whilst the activities of the Designated Safeguarding Lead can be delegated to appropriately trained deputies, the ultimate lead responsibility for child protection (including online safety), remains with the Designated Safeguarding Lead, this lead responsibility should not be delegated.

Manage referrals

The Designated Safeguarding Lead is expected to:

- Refer cases of suspected abuse to the local authority children's social care as required;
- Support staff who make referrals to local authority children's social care;
- Refer cases to the Channel programme where there is a radicalisation concern as required;
- Support staff who make referrals to the Channel programme;
- Refer cases where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service as required; and
- Refer cases where a crime may have been committed to the Police as required.

Work with others

The Designated Safeguarding Lead is expected to:

- Act as a point of contact with the safeguarding partner;
- Liaise with the principal to inform her of issues- especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations;
- As required, liaise with the "case manager" (as per Part four) and the designated officer(s) at the local authority for child protection concerns in cases which concern a staff member;
- Liaise with staff (especially pastoral support staff, college nurse, IT Technicians, and SENCOs or the named person with oversight for SEN in a college) on matters of safety and

safeguarding (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies; and

- Act as a source of support, advice and expertise for all staff.

Training

The Designated Safeguarding Lead (and any deputies) undergo training to provide them with the knowledge and skills required to carry out the role. This training should be updated at least every two years. The Designated Safeguarding Lead should undertake Prevent awareness training.

In addition to the formal training set out above, their knowledge and skills should be refreshed at regular intervals, as required, and at least annually, to allow them to understand and keep up with any developments relevant to their role so they:

- Understand the assessment process for providing early help and statutory intervention, including local criteria for action and local authority children's social care referral arrangements.
- Understand the lasting impact that adversity and trauma can have, including on children's behaviour, mental health and wellbeing, and what is needed in responding to this in promoting educational outcomes;
- Have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so;
- Ensure each member of staff has access to, and understands, the college's child protection policy and procedures, especially new and part time staff;
- Understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the General Data Protection Regulation.
- Understand the importance of information sharing, both within the college, and with the three safeguarding partners, other agencies, organisations and practitioners.
- Are able to keep detailed, accurate, secure written records of concerns and referrals;
- Understand and support the college with regards to the requirements of the Prevent duty and are able to provide advice and support to staff on protecting children from the risk of radicalisation;
- Are able to understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online at school or college;
- Are alert to the specific needs of children in need, those with special educational needs and disabilities (SEND), those with relevant health conditions and young carers
- Can recognise the additional risks that children with SEN and disabilities (SEND) face online, for example, from online bullying, grooming and radicalisation and are confident they have the capability to support SEND children to stay safe online;

- Obtain access to resources and attend any relevant or refresher training courses; and encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the school or college may put in place to protect them.

Raise Awareness

The Designated Safeguarding Lead should:

- Ensure the college's child protection policies are known, understood and used appropriately
- Ensure the college's child protection policy is reviewed annually and the procedures and implementation are updated and reviewed regularly, and work with governing bodies or proprietors regarding this
- Ensure the child protection policy is available publicly and parents are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the college in this;
- Link with the safeguarding partner arrangements to make sure staff are aware of any training opportunities and the latest local policies on local safeguarding arrangements.
- Help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children, including children with a social worker, are experiencing, or experienced, with teachers and college leadership staff. Their role could include ensuring that the college, and their staff know who these children are, understand their academic progress and attainment, and maintain a culture of high aspirations for this cohort; supporting teaching staff to identify the challenges that children in this group might face, and the additional academic support and adjustments they could make to best support these children.

6.4 Individual Staff Responsibilities

The role of college staff

- College staff are particularly important as they are in a position to identify concerns early, provide help for children, and prevent concerns from escalating.
- All staff have a responsibility to provide a safe environment in which children can learn.
- All staff should be prepared to identify children who may benefit from early help. Early help means providing support as soon as a problem emerges at any point in a child's life, from the foundation years through to the teenage years.
- Any staff member who has a concern about a child's welfare should follow the referral processes set out by the college. Staff should expect to support social workers and other agencies following any referral.
- Every college should have a designated safeguarding lead who will provide support to staff to carry out their safeguarding duties and who will liaise closely with other services such as children's social care.

- The Designated Safeguarding Lead (and any deputies) are most likely to have a complete safeguarding picture and be the most appropriate person to advise on the response to safeguarding concerns.
- The Teachers' Standards 2012 state that teachers (which includes headteachers) should safeguard children's wellbeing and maintain public trust in the teaching profession as part of their professional duties.

What college staff need to know

- All staff should be aware of systems within their college which support safeguarding and these should be explained to them as part of staff induction. This should include the:
 - Child protection policy;
 - Behaviour policy;
 - Staff behaviour policy (called the staff code of conduct);
 - Safeguarding response to children who go missing from education; and
 - Role of the designated safeguarding lead (including the identity of the designated safeguarding lead and any deputies)
- Copies of policies and a copy of Part One of this document should be provided to staff at induction
- All staff should receive appropriate safeguarding and child protection training which is regularly updated. In addition, all staff should receive safeguarding and child protection updates (for example, via email, e-bulletins and staff meetings), as required, and at least annually, to provide them with relevant skills and knowledge to safeguard children effectively
- All staff should be aware of their local early help process and understand their role in it
- All staff should be aware of the process for making referrals to children's social care and for statutory assessments under the Children Act 1989, especially section 17 (children in need) and section 47 (a child suffering, or likely to suffer, significant harm) that may follow a referral, along with the role they might be expected to play in such assessments
- All staff should know what to do if a child tells them they are being abused or neglected. Staff should know how to manage the requirement to maintain an appropriate level of confidentiality. This means only involving those who need to be involved, such as the Designated Safeguarding Lead (or a deputy) and children's social care. Staff should never promise a child that they will not tell anyone about a report of abuse, as this may ultimately not be in the best interests of the child.

Breaching these rules may lead to appropriate disciplinary action.

7. **Reporting a Concern**

Anyone who is concerned about a child's or vulnerable adult's welfare, or who believe that a child or vulnerable adult may be at risk of abuse, should pass any information to the Safeguarding and Welfare Team as soon as possible and no longer than 24 hours after the initial concern.

Details of how to do this are included in the accompanying procedures (Appendix 1).

If a member of the Safeguarding and Welfare Team is not immediately available you should contact the Designated/ Deputy Safeguarding Lead (DSL) or any member of the senior leadership team, including the Principal.

*If contact cannot be made with any of the above, staff should contact Lancashire County Council **Children's Social Care Team**. Telephone **0300 123 6720** (8am - 8pm) or out of hours 0300 123 6722 (8pm - 8am) or Lancashire County Council **Adult and Community Care Services**, Telephone **0300 123 6721**, online:*

<https://www.lancashire.gov.uk/health-and-social-care/adult-social-care/safeguarding><https://www.lancashire.gov.uk/health-and-social-care/adult-social-care/safeguarding-adults/adults/>

If a child or vulnerable adult is in immediate danger, the Police should be notified or if they are in need of urgent medical attention an ambulance should be called.

8. **Allegations Against a Member of Staff**

- 8.1 Any allegation of abuse made against a member of the college staff will be dealt with under guidelines contained in Part 4 of the document 'Keeping Children Safe in Education' September 2020. (Please refer to the flow chart in Appendix 3)
- 8.2 All allegations should be reported to the Human Resources Manager who will notify the designated safeguarding lead. An initial assessment of the allegation will be made in consultation with the Local Authority Designated Officer (LADO), Tim Booth; tim.booth@lancashire.gov.uk / 01772 536694
- 8.3 Any allegations of abuse made against the Principal will be dealt with by the Chair of the Governing Board.
- 8.4 The college whistleblowing policy will also be accessible to all staff so that they can raise concerns about poor or unsafe practice, attitudes or actions of colleagues should the need arise.

8.5 Concerns may arise which do not meet the harm threshold in several ways and from a number of sources. For example: suspicion; complaint; or disclosure made by a child, parent or other adult within or outside of the organisation; or as a result of vetting checks undertaken.

It's important to share low level concerns to create and embed a culture of openness, trust and transparency in which the college's values and expected behaviour which are set out in the staff code of conduct are constantly lived, monitored and reinforced by all staff.

A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' - that an adult working in or on behalf of the college may have acted in a way that:

- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work, and
- does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.

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

- being over friendly with children;
- having favourites;
- taking photographs of children on their mobile phone;
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door; or,
- using inappropriate sexualised, intimidating or offensive language.

Low-level concerns about a member of staff should be reported to the HR Director/ designated safeguarding lead (or deputy). Where a low-level concern is raised about the designated safeguarding lead, it should be shared with the principal.

All low-level concerns should be recorded in writing by the HR Director in consultation with the designated safeguarding lead (or deputy). The record should include details of the concern, the context in which the concern arose, and action taken. The name of the individual sharing their concerns should also be noted, if the individual wishes to remain anonymous then that should be respected as far as reasonably possible. Records will be kept confidential, held securely and comply with the Data Protection Act 2018 and GDPR.

If the concern has been raised via a third party, the designated safeguarding lead/HR Director will collect as much evidence as possible by speaking:

- directly to the person who raised the concern, unless it has been raised anonymously;
- to the individual involved and any witnesses.

The information collected will help to categorise the type of behaviour and determine what further action may need to be taken. All of this will be recorded along with the rationale for their decisions and action taken.

Further guidance regarding low level concerns against a member of the college staff will be dealt with under guidelines contained in Part 4 of the document 'Keeping Children Safe in Education' September 2022

9. Recording Action Taken, Feedback and Follow Up:

- 9.1 All concerns, discussions and decisions made and the reasons for those decisions will be recorded centrally by the Safeguarding Team. Following the raising of a concern or a referral, the Safeguarding Team will provide feedback to staff in college on a **need to know** basis.
- 9.2 Everyone must take responsibility for following-up concerns that have been raised with the Safeguarding Team wherever:
- No feedback is forthcoming from them
 - You do not feel listened to or taken seriously
 - You are unhappy with the Safeguarding Team's response
 - Nothing tangible changes for the better and/ or the situation deteriorates.

10. Information Sharing

- 10.1 The College adopts the information sharing protocols recommended in local and national guidance. Any requests for information sharing will be considered by the Designated Safeguarding Lead or Deputies who will comply with relevant guidance and college policies and procedure.
- 10.2 The designated safeguarding lead should be equipped to:
- understand the importance of information sharing, both within the college, and with other schools and colleges on transfer including in-year and between primary and secondary education, and with the safeguarding partners, other agencies, organisations and practitioners;
 - understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR); and
 - be able to keep detailed, accurate, secure written records of concerns and referrals and understand the purpose of this record-keeping.
- 10.3 The College will retain safeguarding and child protection records for children and vulnerable adults for a 10-year period following the academic year the initial referral was received.

11. Children Missing in Education

- 11.1 The college has a responsibility to ensure that all staff are aware that children going missing, particularly repeatedly, can act as a vital warning sign of a range of safeguarding possibilities. 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 should be aware of and follow the college unauthorised absence and children missing from education procedures.

- 11.2 In addition, the college has a responsibility to work collaboratively with local schools, partner organisations and the Local Authority to safeguard students.
- 11.3 On occasions where 14 to 16 year old students are on a programme of study at the college, the college has a responsibility to inform named schools when the attendance or absence of a 14 to 16-year-old students becomes a cause for concern so that the school can implement their own attendance or missing in education procedures.

12. Work Experience and Work/ Industry Placement

- 12.1 Where students are undertaking work and/or industry placements, the college are required to take reasonable steps to assess the suitability of the placement and the effectiveness of the employer's risk management arrangements.
- 12.2 It is the responsibility of all staff working with employers who provide training for our learners to report any concerns regarding their suitability as placement providers, regardless of the learner's age or mode of study.
- 12.3 These checks must be conducted in a timely manner and should be monitored throughout with any safeguarding concerns reported as described in this policy.

13. Operation Encompass

Domestic abuse is any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 and over who are, or have been, intimate partners or family members regardless of gender or sexuality.

The abuse can encompass, but is not limited to:

- Psychological
- Physical
- Sexual
- Financial
- Emotional

Exposure to domestic abuse and / or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

All staff and volunteers understand what domestic abuse is and the potential impact upon children and how this might be displayed.

The DSLs will: -

- Ensure that the college has suitably trained Key Adult/s in order to fulfil its obligations under Operation Encompass

- Ensure that the college's commitment to Operation Encompass is known throughout the college community via the means of staff training, parental, letters, posters and the college website
- College should provide an overview of Operation Encompass with the names of the Op Encompass leads and a link to the Op Encompass website (<https://www.operationencompass.org/>)

Operation Encompass is a police and education early information sharing partnership, enabling colleges to offer immediate support for children and young people experiencing domestic abuse and other traumatic experiences. The police with a college's trained Key Adult (DSL) share information prior to the start of the next college day after officers have attended a domestic abuse incident thus enabling appropriate support to be given, dependent upon the needs and wishes of the child.

Children experiencing domestic abuse are negatively impacted by this exposure; Domestic abuse has been identified as an Adverse Childhood Experience and can lead to emotional, physical and psychological harm. Operation Encompass aims to mitigate this harm by enabling immediate support, making a child's day better and giving them a better tomorrow. Children Missing from Education can be a potential sign of abuse or neglect including sexual exploitation, undergoing female genital mutilation, forced marriage or travelling to conflict zones. All staff and volunteers follow college procedures when a child misses education, particularly on repeat occasions to help identify the risk of abuse and neglect.

Operation Encompass provides an advice and helpline service for all staff members from educational settings who may be concerned about children who have experienced domestic abuse. The helpline is available 8AM to 1PM, Monday to Friday on 0204 513 9990 (charged at local rate).

14. Monitoring and Review

14.1 The policy will be reviewed annually by Deputy Principal Quality and Curriculum.

15. Management Responsibility

The Deputy Principal Quality and Curriculum has overall management responsibility for this policy. Day to day management responsibility for this policy has been devolved to the Safeguarding and Prevent Manager and the Director of Learner Services.

16. Related Policies/Procedures

- Student Bullying and Harassment policy (Including sexual harassment, sexual violence and sexually harmful behaviour)
- Acceptable Use of IT Policy
- E-Safety Policy
- Recruitment and Selection procedure
- DBS and Rehabilitation of Offenders procedures
- Equality Diversity and Inclusion Policy
- Personal Care policy
- Behaviour Policy
- Student Disciplinary Policy
- Whistleblowing procedure
- Social media policy
- Staff Code of Conduct
- Trips and Visits Policy
- Health and Safety Policy
- Student Medication Policy
- Criminal Convictions Policy
- Visitor Policy

17. Dissemination

17.1 Nelson and Colne College Group Staff Hub

17.2 Nelson and Colne College, Lancashire Adult Learning and Accrington and Rossendale College Websites

18. Additional Advice and Support

Below provides links to additional guidance for all staff so that they can develop a wider understanding of safeguarding issues or concerns.

Abuse

[Supporting practice in tackling child sexual abuse - CSA Centre](#) Centre of Expertise on Child Sexual Abuse has free evidence-based practice resources to help professionals working with children and young people to identify and respond appropriately to concerns of child sexual abuse.

[What to do if you're worried a child is being abused](#) – DfE advice

[Domestic abuse: Various Information/Guidance](#) - Home Office (HO)

[Faith based abuse: National Action Plan](#) - DfE advice

[Disrespect NoBody campaign - GOV.UK](#) - Home Office website

[Tackling Child Sexual Abuse Strategy](#) – Home Office policy paper

[Together we can stop child sexual abuse](#) – HM Government campaign

Bullying

[Preventing bullying including cyberbullying](#) - DfE advice

Children missing from education, home or care

[Children missing education](#) - DfE statutory guidance

[Child missing from home or care](#) - DfE statutory guidance

[Children and adults missing strategy](#) - Home Office strategy

Children with family members in prison

[National Information Centre on Children of Offenders](#) - Barnardo's in partnership with HM Prison and Probation Service

Child Exploitation

[Trafficking: safeguarding children](#) - DfE and Home Office guidance

[Care of unaccompanied and trafficked children](#) – DfE statutory guidance

[Modern slavery: how to identify and support victims](#) – HO statutory guidance

[Child exploitation disruption toolkit](#) - HO statutory guidance

[County Lines Toolkit For Professionals](#) - The Children's Society in partnership with Victim Support and National Police Chiefs' Council

Confidentiality

[Gillick competency Fraser guidelines](#) - Guidelines to help with balancing children's rights along with safeguarding responsibilities.

Drugs

[Drug strategy 2021](#) - Home Office strategy

[Information and advice on drugs](#) - Talk to Frank website

[Drug and Alcohol education — teacher guidance & evidence review](#) – PSHE Association

(so called) “Honour Based Abuse” including FGM and forced marriage

[Female genital mutilation: information and resources-](#) Home Office guidance

[Female genital mutilation: multi agency statutory guidance](#) - DfE, Department for Health, and Home Office

[Forced marriage](#) - Forced Marriage Unit (FMU) resources

[Forced marriage](#) - Government multi-agency practice guidelines and multi-agency statutory guidance

[FGM resource pack](#) – HM Government guidance

Health and Well-being

[Rise Above: Free PSHE resources on health, wellbeing and resilience](#) - Public Health England

[Supporting pupils at schools with medical conditions](#) - DfE statutory guidance

[Mental health and behaviour in schools](#) - DfE advice

[Overview - Fabricated or induced illness](#) - NHS advice

Homelessness

[Homelessness code of guidance for local authorities](#) – Department for Levelling Up, Housing and Communities guidance

Information Sharing

[Government information sharing advice](#) - Guidance on information sharing for people who provide safeguarding services to children, young people, parents and carers.

[Information Commissioner's Office: Data sharing information hub](#) - Information to help schools and colleges comply with UK data protection legislation including UK GDPR.

Online safety-advice

[Childnet](#) provide guidance for schools on cyberbullying

[Educateagainsthate](#) provides practical advice and support on protecting children from extremism and radicalisation

[London Grid for Learning](#) provides advice on all aspects of a school or college's online safety arrangements

[NSPCC E-safety for schools](#) provides advice, templates, and tools on all aspects of a school or college's online safety arrangements

[Safer recruitment consortium](#) "guidance for safe working practice", which may help ensure staff behaviour policies are robust and effective

[Searching screening and confiscation](#) is departmental advice for schools on searching children and confiscating items such as mobile phones

[South West Grid for Learning](#) provides advice on all aspects of a school or college's online safety arrangements

[Use of social media for online radicalisation](#) - A briefing note for schools on how social media is used to encourage travel to Syria and Iraq

[Online Safety Audit Tool](#) from UK Council for Internet Safety to help mentors of trainee teachers and newly qualified teachers induct mentees and provide ongoing support, development and monitoring

[Online safety guidance if you own or manage an online platform](#) DCMS advice

[A business guide for protecting children on your online platform](#) DCMS advice

[UK Safer Internet Centre](#) provide tips, advice, guides and other resources to help keep children safe online

Online safety- Remote education, virtual lessons and live streaming

[Case studies](#) for schools to learn from each other

[Guidance Get help with remote education](#) resources and support for teachers and school leaders on educating pupils and students

[Departmental guidance on safeguarding and remote education](#) including planning remote education strategies and teaching remotely

[London Grid for Learning](#) guidance, including platform specific advice

[National cyber security centre](#) guidance on choosing, configuring and deploying video conferencing

[UK Safer Internet Centre](#) guidance on safe remote learning

Online Safety- Support for children

[Childline](#) for free and confidential advice

[UK Safer Internet Centre](#) to report and remove harmful online content

[CEOP](#) for advice on making a report about online abuse

Online safety- Parental support

[Childnet](#) offers a toolkit to support parents and carers of children of any age to start discussions about their online life, and to find out where to get more help and support

[Commonsensemedia](#) provide independent reviews, age ratings, & other information about all types of media for children and their parents

[Government advice](#) about protecting children from specific online harms such as child sexual abuse, sexting, and cyberbullying

[Internet Matters](#) provide age-specific online safety checklists, guides on how to set parental controls, and practical tips to help children get the most out of their digital world [How Can I Help My Child?](#) Marie Collins Foundation – Sexual Abuse Online

[Let's Talk About It](#) provides advice for parents and carers to keep children safe from online radicalisation

[London Grid for Learning](#) provides support for parents and carers to keep their children safe online, including tips to keep primary aged children safe online

[Stopitnow](#) resource from [The Lucy Faithfull Foundation](#) can be used by parents and carers who are concerned about someone's behaviour, including children who may be displaying concerning sexual behaviour (not just about online)

[National Crime Agency/CEOP Thinkuknow](#) provides support for parents and carers to keep their children safe online

[Net-aware](#) provides support for parents and carers from the NSPCC and O2, including a guide to social networks, apps and games

[Parentzone](#) provides help for parents and carers on how to keep their children safe online

[Talking to your child about online sexual harassment: A guide for parents](#) – This is the Children's Commissioner's parent guide on talking to your children about online sexual harassment

[#Ask the awkward](#) – Child Exploitation and Online Protection Centre guidance to parents to talk to their children about online relationships

Private fostering

[Private fostering: local authorities](#) - DfE statutory guidance

Radicalisation

[Prevent duty guidance](#)- Home Office guidance

[Prevent duty: additional advice for schools and childcare providers](#) - DfE advice

[Educate Against Hate website](#) - DfE and Home Office advice

[Prevent for FE and Training](#) - Education and Training Foundation (ETF)

[Extremism and Radicalisation Safeguarding Resources](#) – Resources by London Grid for Learning

Serious Violence

[Serious violence strategy](#) - Home Office Strategy

[Factors linked to serious violence and how these factors can be used to identify individuals for intervention](#) – Home Office

[Youth Endowment Fund](#) – Home Office

[Gangs and youth violence: for schools and colleges](#) - Home Office advice

[Tackling violence against women and girls strategy](#)- Home Office strategy

[Violence against women and girls: national statement of expectations for victims](#) - Home Office guidance

Sexual violence and sexual harassment

Specialist Organisations

[Barnardo's](#) - UK charity caring for and supporting some of the most vulnerable children and young people through their range of services.

[Lucy Faithful Foundation](#) - UK-wide child protection charity dedicated to preventing child sexual abuse. They work with families affected by sexual abuse and also run the confidential Stop it Now! Helpline.

[Marie Collins Foundation](#) – Charity that, amongst other things, works directly with children, young people, and families to enable their recovery following sexual abuse.

[NSPCC](#) - Children's charity specialising in child protection with statutory powers enabling them to take action and safeguard children at risk of abuse.

[Rape Crisis](#) - National charity and the umbrella body for their network of independent member Rape Crisis Centres.

[UK Safer Internet Centre](#) - Provides advice and support to children, young people, parents, carers and schools about staying safe online.

Harmful sexual behaviour

[Rape Crisis \(England & Wales\)](#) or [The Survivors Trust](#) for information, advice, and details of local specialist sexual violence organisations.

[NICE guidance](#) contains information on, amongst other things: developing interventions; working with families and carers; and multi-agency working.

[HSB toolkit](#) The Lucy Faithfull Foundation - designed for parents, carers, family members and professionals, to help everyone play their part in keeping children safe. It has links to useful information, resources, and support as well as practical tips to prevent harmful sexual behaviour and provide safe environments for families.

[NSPCC Learning: Protecting children from harmful sexual behaviour](#) and [NSPCC - Harmful sexual behaviour framework](#)- free and independent advice about HSB.

[Contextual Safeguarding Network – Beyond Referrals \(Schools\)](#) provides a school self assessment toolkit and guidance for addressing HSB in schools.

[Preventing harmful sexual behaviour in children - Stop It Now](#) provides a guide for parents, carers and professionals to help everyone do their part in keeping children safe, they also run a free confidential helpline.

Support for Victims

[Anti-Bullying Alliance](#) - Detailed information for anyone being bullied, along with advice for parents and schools. Signposts to various helplines and websites for further support.

[Rape Crisis](#) - Provide and signpost to a range of services to support people who have experienced rape, child abuse or any kind of sexual violence.

[The Survivors Trust](#)- UK-wide national umbrella agency with resources and support dedicated to survivors of rape, sexual violence and child sex abuse.

[Victim Support](#) - Supporting children and young people who have been affected by crime. Also provides support to parents and professionals who work with children and young people – regardless of whether a crime has been reported or how long ago it was.

[Childline](#) provides free and confidential advice for children and young people.

Toolkits

[ask AVA](#) - The Ask AVA prevention platform has been created to support education practitioners across the UK to develop and deliver a comprehensive programme to stop Violence Against Women and Girls.

[NSPCC](#) - Online Self-assessment tool to ensure organisations are doing everything they can to safeguard children.

[NSPCC](#) - Resources which help adults respond to children disclosing abuse.

NSPCC also provides free and independent advice about HSB: [NSPCC - Harmful sexual behaviour framework](#)

[Safeguarding Unit, Farrer and Co. and Carlene Firmin, MBE, University of Bedfordshire](#) - Peer-on-Peer Abuse toolkit provides practical guidance for schools on how to prevent, identify early and respond appropriately to peer-on-peer abuse.

[Contextual Safeguarding Network](#) – self-assessment toolkit for schools to assess their own response to HSB.

[Childnet - STAR SEND Toolkit](#) equips, enables and empowers educators with the knowledge to support young people with special educational needs and disabilities.

[Childnet - Just a joke?](#) provides lesson plans, activities, a quiz and teaching guide designed to explore problematic online sexual behaviour with 9-12 year olds.

[Childnet - Step Up, Speak Up](#) a practical campaign toolkit that addresses the issue of online sexual harassment amongst young people aged 13-17 years old.

[NSPCC - Harmful sexual behaviour framework](#) An evidence-informed framework for children and young people displaying HSB.

[Contextual Safeguarding Network – Beyond Referrals - Schools](#) levers for addressing HSB in schools.

Sharing nudes and semi-nudes

[London Grid for Learning-collection of advice](#) - Various information and resources dealing with the sharing of nudes and semi-nudes.

[UKCIS Sharing nudes and semi-nudes: advice for education settings working with children and young people](#) - Advice for schools and colleges on responding to incidents of non-consensual sharing of nudes and semi-nudes.

Nelson and Colne College - General Business Document

18. Appendices

Appendix 1: Procedures for staff who are reporting a safeguarding concern

Appendix 2: Procedures for Safeguarding Team who are reporting a concern to the Local Authority.

Appendix 3: Procedure for managing allegations against staff.



Appendix 2: Procedure for Referral by Safeguarding and Welfare Team to the Local Authority

Safeguarding and Welfare Team considers:

- Current concern/incident/events and any relevant historical information
- Possible explanations and any contemporaneous events
- The need to seek further, external information / advice
- Actions / options (including discussion with parents as relevant)
- Recording

Need for Early Help/ Support Identified

- Discuss with SWT/
Pastoral Team
- Discuss with parents
- Agree ongoing monitoring/
in-college support
- Obtain consent
- Follow locally agreed
protocols including
Continuum of Need and
Thresholds and Early
Help guidance
- Possible Channel
- Referral
- Record
- SWT monitors and
reviews. May consider
need for Child in Need/
Section 17 referral

Child Protection/ Section 47 Referral to Children's Social Care

- Where it is clear that
a child protection referral
is necessary then the
matter should be
reported to Children's
Social Care without delay
0300 123 6720
- Out of hours referral
should be made to the
duty team **0300 123 6722**;
and/or
- Notify police if a crime has
been committed;
- Inform parents (as and
when appropriate and
in-line with any advice
from CSC/Police)
- SWT records responses
from (within 24 hrs)/
seeks one where none is
received/escalates where
unhappy with response

Vulnerable Adult Concern/Alert

- Once it's been established
that a vulnerable adult is at
risk, the matter should be
referred to Adult Social Care
Services **0300 123 6721**
- Notify police if the adult is
in immediate danger or if a
crime has been committed
- If there is uncertainty
as to whether abuse has
occurred advice can also
be sought from the
0300 123 6721
- SWT records, responses
from ASC/seeks one
where none is received/
escalates where unhappy

Appendix 3: Procedure for Managing Allegations Against Staff

It is alleged that:

A member of staff or volunteer in college has:

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

CONFIDENTIALITY REMINDER

Report to Assistant Principal/HR Manager who acts as Case Manager (or Chair of Governors if Allegation is against the Principal)

- Case Manager begins timeline/record and ensures any immediate risk managed
- Without speaking to anyone else at this stage or investigating the matter, Case Manager contacts the local authority Designated Officer (LADO) to establish whether LADO notification and/or children's social care/ or adult's social care/police referral is required (LADO: **Tim Booth**, tim.booth@lancashire.gov.uk, 01772 538694). Case Manager gathers any additional information as advised by LADO

CONFIDENTIALITY REMINDER

The Management of Allegations Against Staff

Keeping Children Safe in Education (Part four) defines an allegation as follows:

NFA/College Action

- Update and proceed with any in-college action
- Ensure appropriate support for all
- Case Manager records, including formal outcome on HR file
- Consider any learning and share with HR, staff and parents as appropriate

Or

- Case Manager completes LADO notification and ensures any onward consultation/ referral(s) to children's/adult's social care and Police
- Discuss with HR

