

Child and Adults at Risk Protection Policy

September 2023

This policy provides guidance to all adults working within the college whether paid or voluntary or directly employed by the college or by a third party.

This policy should be read alongside Part 1, Annex A and Annex B of Keeping Children Safe in Education 2023, and in conjunction with our Safeguarding Induction handbook which is available in sharepoint

1. Introduction

Pinc College and its governing body recognises its duty towards safeguarding and promoting the welfare of children as set out in The Apprenticeships, Skills, Children and Learning Act 2009 (as amended) and the Care Act 2014 which sets out the aims and objectives of adults safeguarding activity. For the purposes of this policy references made to 'child' or 'children' also includes adult students at the College. However there are different procedures for the reporting of incidents to external agencies.

2. Legislation and Guidance

- Colleges must have regard for the DfE statutory guidance '[Keeping Children Safe in Education](#) (DfE 2023). **This child and vulnerable adults' protection policy should be read alongside this statutory guidance and all staff must read and understand at least Part 1 and Annex A and B of this guidance.**
- [Working Together to Safeguard Children](#) (DfE 2018)
- [CSE Definition and guidance for practitioners](#) DfE 2017
- [Criminal Exploitation of children and vulnerable adults: County Lines Guidance](#) DfE 2017
- [Disqualification under the Childcare Act](#) DfE 2006
- [Information sharing: Advice for practitioners providing safeguarding services](#) HMG 2018
- [The Prevent Duty - Departmental advice for schools and childcare providers](#) DfE 2015
- [How social media is used to encourage travel to Syria and Iraq](#) DfE 2015 (Briefing note for schools)
- [What to do if you are worried a child is being abused: Advice for practitioners](#) DfE 2015
- [Sharing nudes and semi-nudes: advice for education settings working with children and young people](#) DDCMS / UKCIS 2020
- [Serious Violence Duty: statutory guidance](#) Home Office 2022
- [Domestic Abuse: statutory guidance](#) Home Office 2022
- [Working together to improve school attendance](#) DfE 2022
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3. Policy Aims and Ethos

- To ensure college takes appropriate action, in a timely manner, to safeguard and promote the welfare of all students

- To ensure responsibilities and procedures are fully understood and that everyone can recognise signs and indicators of abuse or neglect and respond to them appropriately.
- To ensure that the college's policy and practice meets local and national guidance, and all statutory requirements are in place.

Our college will prevent and respond to abuse and neglect by ensuring that the ethos and atmosphere of the college is conducive to a safe environment. Students and parents/carers will feel supported and able to report safeguarding concerns to any member of staff or volunteer. Staff and volunteers will feel they are supported by colleagues and the senior leadership team, including the governing body, and are able to report and seek advice and guidance on any safeguarding concerns, including those regarding colleagues or themselves.

As part of our safeguarding ethos, we encourage students to respect the fundamental British values of democracy, the rule of law, individual liberty and mutual respect and tolerance of those with different faiths and beliefs. We will ensure that partisan political views are not promoted in the teaching of any subject in the college and where political issues are brought to the attention of the students, reasonably practicable steps will be taken to offer a balanced presentation of opposing views to students. We will ensure that reasonable steps are taken to ensure visitors to the college do not share messages with the college community which are contrary to our college ethos and beliefs.

Safeguarding is everybody's responsibility and, as such, this policy applies to all staff and volunteers working in the college. An allegation, disclosure or suspicion of abuse, or an expression of concern about abuse, could be made to any member of staff, not just those with a teaching or welfare-related role. Similarly, any member of staff may observe or suspect an incident of abuse.

4. Children and Adults at Risk Protection Statement

Pinc college is committed to safeguarding students and promoting their welfare and expects all staff, governors, volunteers and visitors to share this commitment and maintain a vigilant and safe environment. Everyone has a responsibility to act, without delay, to protect children and adults at risk by reporting anything that might suggest a student is being abused or neglected. It is our willingness to work safely and challenge inappropriate behaviours that underpins this commitment. The college seeks to work in partnership with families and other agencies to improve the outcomes for students who are vulnerable or in need.

5. Definitions

Child:

A child includes students at the College under the age of 18.

Adult at Risk:

Adults at risk are persons over the age of 18 who are considered vulnerable if they are unable to look after themselves, protect themselves from harm or exploitation or are unable to report abuse.

Safeguarding Children:

'Safeguarding and promoting the welfare of children is defined 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.’ (DfE 2023)

Abuse:

Abuse is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. 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 another child or children.

Physical Abuse:

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

Emotional Abuse:

The *persistent* emotional maltreatment of a child such as to cause severe and 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

Neglect:

The persistent failure to meet a child’s basic physical and/or psychological needs, likely to result in the serious impairment of the child’s health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to:

- provide adequate food, clothing and shelter (including exclusion from home or abandonment)
- protect a child from physical and emotional harm or danger
- ensure adequate supervision (including the use of inadequate care-givers)
- ensure access to appropriate medical care or treatment

It may also include neglect of, or unresponsiveness to, a child’s basic emotional needs.

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. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

Further information regarding the signs and indicators of abuse are set out in the DfE guidance [Keeping Children Safe in Education](#). This includes amongst others, the definitions and indicators of Child Sexual Exploitation, Child Criminal Exploitation (including County Lines), Serious Violence, Female Genital Mutilation, Forced Marriage, Honour Based Abuse, child on child abuse, Sexual Violence and Sexual Harassment (including sexting and other related issues), Vulnerabilities to Extremism and Children Missing Education

6. Safeguarding Children and Adults: Key Principles

- The student's needs and welfare are paramount. All children have a right to be protected from abuse and neglect and have their welfare safeguarded.
- all staff will maintain an attitude of "*it could happen here*" where safeguarding is concerned.
- Students will be listened to and their views and wishes should inform any assessment and provision for them. Staff will always act in the interests of the child, in order to protect them.
- The college recognises that scrutiny, challenge and supervision are key to safeguarding children.
- The college is committed to working with other agencies to provide early help for children before they become at risk of harm or require a 'child in need' statutory assessment.
- All staff will ensure they are aware of the early help process and understand their role in it. This includes identifying emerging problems, liaising with the designated safeguarding lead, sharing information with other professionals to support early identification and assessment and, in some cases, acting as the lead professional in undertaking an early help assessment.
- All staff are 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.'
- Everyone has responsibility to escalate their concerns and 'press for reconsideration' if they believe a child's needs remain unmet or if the child is failing to thrive and in need or if the child is at risk of harm. Concerns about a child should always lead to help for a child at some point and the child's situation should improve.
- The college will work in partnership with other agencies to promote the welfare of children and protect them from harm, including the need to share information about a child in order to safeguard them.
- The college will work with other agencies to ensure any actions that are part of a multi-agency coordinated plan are completed in a timely way.
- The college will follow the Local Authority and the Local Safeguarding Children Partnership procedures and provide them with information as required.
- Staff, children and families will be supported following child protection processes being followed.
- Children have a right to learn ways to keep themselves safe from harm and exploitation.

The College will ensure its teachers adhere to [Teachers' Standards](#) (DfE 2013, updated 2021) to 'uphold public trust in the profession and maintain high standards of ethics and behaviour, within and outside college, including:

- treating students with dignity, building relationships rooted in mutual respect, and at all times observing proper boundaries appropriate to a teacher's professional position
- having regard for the need to safeguard students' well-being, in accordance with statutory provisions
- showing tolerance of and respect for the rights of others
- not undermining fundamental British values, including democracy, the rule of law, individual liberty and mutual respect, and tolerance of those with different faiths and beliefs
- ensuring that personal beliefs are not expressed in ways which exploit students' vulnerability or might lead them to break the law.

In addition, the **Sexual Offences Act 2003** makes it clear that all members of staff are in a position of trust and would therefore be committing a criminal offence to have a sexual relationship with a young person below the age of 18, even if that pupil is over the age of consent. In addition, it would be a breach of trust to have a relationship with any college student over the age of 18.

The **Human Rights Act 1998** sets out fundamental rights and freedoms that everyone is entitled to and contains the Articles and protocols of the **European Convention on Human Rights** that are deemed to apply within the UK. It compels public organisations to protect and respect an individual's human rights when they make decisions about them. Under the human Rights Act it is unlawful for colleges and staff to act in a way that is incompatible with the Convention. The specific convention rights applying to colleges and colleges are:

- Article 3: the right to freedom from inhuman and degrading treatment (an absolute right)
- Article 8: the right to respect for private and family life (a qualified right) includes a duty to protect individuals' physical and psychological integrity
- Article 14: requires that all of the rights and freedoms set out in the Act must be protected and applied without discrimination, and
- Protocol 1, Article 2: protects the right to education

We recognise that being subjected to harassment, violence and or abuse, including that of a sexual nature, may breach any or all of these rights, depending on the nature of the conduct and the circumstances.

Colleges also have obligations under the **Equality Act 2010** whereby colleges must not unlawfully discriminate against students because of their sex, race, disability, religion or belief, gender reassignment, pregnancy and maternity, or sexual orientation (protected characteristics). The College has a separate Equality, Diversity and Inclusion policy which also references Safeguarding duties.

7. Communicating with parents and visitors

The college is committed to the principles of Working Together to Safeguard Children which states that a *'child centred approach is fundamental to safeguarding and promoting the welfare of every child. A child centred approach means keeping the child in focus when making decisions about their lives and working in partnership with them and their families.'*

The following statement will be provided to parents and carers via the College's Management Information System (MIS) Databridge so they are aware of the college's responsibilities:

'The college ensures students learn in a safe, caring and enriching environment. Students are taught how to identify risky, unsafe or problematic situations, how and when to seek help, how to develop positive and healthy relationships and how to avoid situations where they might be at risk including by being exploited.'

The college also has a statutory responsibility to share any concerns it might have about a child in need of protection with other agencies and in particular police, health and children's services. Colleges are not able to investigate child protection concerns but have a legal duty to refer them. In most instances the college will be able to inform the parents/carers of its need to make a referral. However, sometimes the college can in certain circumstances share information without the consent of the family and may be advised by children's services or police that the parent/carer cannot be informed whilst they investigate the matter or make enquires. We understand the anxiety parents/carers understandably feel

when they are not told about any concerns from the outset. The college follows legislation that aims to act in the interests of the child.

The college will always seek to work in partnership with parents and other agencies to ensure the best possible outcomes for the child and family.'

8. Roles and responsibilities

Chief Executive Officer: Lisa Alberti (lisa.alberti@pinccollege.co.uk)
Principal: Rebecca Bromley-Woods (Rebecca.bromley-woods@pinccollege.co.uk)
Vice Principal for Student Experience and Safeguarding: Alison Twomey(alison.twomey@pinccollege.co.uk)
Safeguarding Governor:

North West

Regional College Lead:

Alice Giles: alice.giles@pinccollege.co.uk

Manchester Museum

Campus Lead: Natalie Linney (natalie.linney@pinccollege.co.uk)

Bolton Museum

Campus Lead: Tracey Banks (tracey.banks@pinccollege.co.uk)

Rochdale: Touchstones

Campus Lead: Leona Armstrong (Leona.armstrong@pinccollegelco.uk)

Salford Art Gallery

Campus Lead: Nicola Platt (Nicola.platt@pinccollege.co.uk)

Macclesfield Heritage Centre

Campus Lead: Kylie Simpson (kylie.simpson@pinccollege.co.uk)

Yorkshire

Regional College Lead:

Jessica Watson jessica.watson@pinccollege.co.uk

Bradford: Cartwright Hall

Campus Lead: Kirsty Denman (Kirsty.denman@pinccollege.co.uk)

Halifax: Dean Clough

Campus Lead: Lee Clough (lee.clough@pinccollege.co.uk)

Leeds: The Tetley

Campus Lead: Janet Vinci (janet.vinci@pinccollege.co.uk)

York: Yorkshire Museum

Campus Lead: Kirste Gregory (kirste.gregory@pinccollege.co.uk)

Midlands

Regional College Lead:

Rachel Newman (rachel.newman@pinccollege.co.uk)

Stoke The Potteries

Campus Lead: Stacey Rowell (Stacey.rowell@pinccollege.co.uk)

Stoke: Middleport Potteries

Campus Lead: Rachael Hogan (Rachael.hogan@pinccollege.co.uk)

Birmingham: Aston Hall

Campus Lead: Caroline Rhodes (caroline.rhodes@pinccollege.co.uk)

Wales

Regional College Lead

Rachel Newman (rachel.newman@pinccollege.co.uk)

Cardiff, National Museum

Campus Lead: Oana Warren (oana.warren@pinccollege.co.uk)

All staff (and volunteers) should:

- Contribute to ensuring students learn in a safe environment.
- Maintain the belief that *'it could happen here'*.
- Be particularly alert to the potential need for early help for a child who:
 - is disabled or has certain health conditions and has specific additional needs
 - has special educational needs (whether or not they have a statutory education, health and care plan)
 - has a mental health need
 - is a young carer
 - is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines
 - is frequently missing/goes missing from care or from home
 - is at risk of modern slavery, trafficking, sexual or criminal exploitation
 - is at risk of being radicalised or exploited
 - has a family member in prison, or is affected by parental offending
 - is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health problems and domestic abuse
 - is misusing alcohol or other drugs 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 showing early signs of abuse and/or neglect
 - is a privately fostered child
 - is persistently absent from education, including persistent absences for part of the college day
- Be aware that safeguarding incidents and/or behaviours can be associated with factors outside of the college and/or can occur between children outside of these environments. All staff should consider whether students are at risk of abuse or exploitation in situations outside of their family home. Extra-familial harms take a variety of different forms and students can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation and serious violence.
- Be aware that mental health problems can, in some cases, be an indicator that a student has suffered or is at risk of suffering abuse, neglect or exploitation. Staff are well placed to observe students day to day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.

- Understand that where students have suffered abuse or neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. All staff should be aware of how these experiences can impact on a child's mental health, behaviour and education.
- Understand that all staff play an important part in working to prevent sexual harassment, online sexual abuse and sexual violence between students. Staff will assume that these behaviours are happening in our college and will work as part of a whole college approach to address such issues, including via the curriculum. Staff must understand how to handle reports of sexual violence or harassment.
- Staff must ensure that they appropriately challenge any form of derogatory and sexualised language or behaviour to ensure that everyone is respectful at all times.

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.

- Report any concerns about a student's welfare without delay to the Designated Safeguarding Lead or in their absence the Regional College Lead or Vice Principal for Student Experience and Safeguarding.
- Ensure that they record their concerns using the college's agreed reporting procedure in a contemporaneous fashion. Records will note the difference between fact and opinion. The student's voice will be made clearly evident. At Pinc College, our team use Databridge to record all safeguarding concerns.
- Ensure that concerns relating to students remain confidential and are only shared with the appropriate safeguarding staff.
- Understand that any member of staff can make a referral to children's or adult's services should that be required, informing the Designated Safeguarding Lead of any action taken.
- Understand their responsibility to escalate their concerns and 'press for reconsideration' if a student remains at risk or their needs are not met or if it appears that the college is not taking effective action in line with expected procedures. This includes the understanding that any member of staff can make a referral to Children's or Adult's Services if required to do.
- Teachers and those providing teaching **must** personally report to the police cases where they discover that an act of FGM appears to have been carried out.
- Be aware safeguarding issues can manifest themselves via child on child or peer on peer abuse.
- Understand that it may be appropriate to discuss with the Vice Principal Student Experience and Safeguarding matters outside of work, which may have implications for the safeguarding of children and vulnerable adults in the workplace. This includes information about themselves. Staff will ensure that they are aware of the circumstances where this would be applicable.
- Report any concerns (including those which might be considered to be low level concerns) about the behaviour of an adult towards a child without delay to the Vice Principal Student Experience and Safeguarding, Safeguarding Governor or if required the Local Authority Designated Officer for Allegations against Staff.
- Follow the college's policies including this child and adults at risk protection policy and the college's code of conduct for adults and the [Guidance for safer working practice for those working with children and young people in education settings](#) (2022)
- Understand the circumstances where it may be necessary to 'self-report' incidents where they could have found themselves in a situation which could be misinterpreted, or may appear compromising

to others, or if they have behaved in a manner which, on reflection, they consider to fall below the standards set out within the code of conduct for staff.

- Be aware that behaviour by themselves, those with whom they have a relationship or association, or others in their personal lives (in or out of college or online), may impact on their work with children.
- Be aware that they should inform their Chief Executive Officer of any cautions, convictions or relevant order accrued during their employment, and/or if they are charged with a criminal offence.
- Understand that some children, including those with Special Educational Needs or Looked After, may be more vulnerable to abuse.

'Children with special educational needs and disabilities (SEND) or certain health conditions can face additional safeguarding challenges. This can include:

- *assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration;*
- *these children being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children;*
- *the potential for children with SEND or certain medical conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs; and*
- *communication barriers and difficulties in overcoming these barriers.'* (DFE 2023)

The DFE has provided additional practice guidance '[Safeguarding Disabled Children](#)' DFE 2009.

- Have access to the college's managing allegations against adults procedures and whistle blowing policy. In addition, the NSPCC whistleblowing helpline is available for staff who do not feel able to raise concerns regarding child protection failures internally. Staff can call: 0800 028 0285 – line is available from 8:00 AM to 8:00 PM, Monday to Friday and Email: help@nspcc.org.uk.
- Have access to [What to do if you are worried a child is being abused 2015: Advice for practitioners](#) DFE 2015
- Understand that any indication of failure to follow any of the procedures set out within this policy will lead to a formal investigation by the college.

The Governing Body responsibilities are to ensure:

- The college meets the statutory responsibilities set out in Keeping Children Safe in Education (DFE 2023) and Working Together to Safeguard Children (DFE 2018).
- The child and vulnerable adults protection policy is reviewed at least annually by the full governing body and available to parents and carers, via the college's website.
- There is a named Designated Safeguarding Lead who is a member of the college leadership team. Governors will ensure that this person has the appropriate status and authority within the college to carry out the duties of the post. They will be given the time, funding, training, resources and support to provide advice and support to other staff on child welfare and child protection matters, to take part in strategy discussions and inter-agency meetings, and/or to support other staff to do so, and to contribute to the assessment of children. There are colleagues trained to provide cover for the role.
- The college has procedures in keeping with the LSCP for dealing with any allegations made against any adult working within or on behalf of the college.
- There is a nominated governor who is the case manager for managing any allegations against the Chief Executive Officer and Principal.
- The college follows safer recruitment procedures, including the statutory pre-employment checks on all staff working with young people.
- The college itself is a safe environment where the views of students and families are listened to and where students are taught about safeguarding and how to keep themselves safe, including on the internet or when using new technology. Any complaints about services lead to improvements in practice.

- There is effective analysis of safeguarding data including bullying, attendance, behaviour logs, incidents of sexual violence or harassment, students taken off roll, the views and progress and participation of vulnerable students.
- There are clear systems and processes in place to identify and respond to issues of sexual violence, sexual harassment or harmful sexualised behaviours between students, including a curriculum designed to specifically address sexual harassment, online abuse, sexual violence and issues of consent in an appropriate way.

Governing bodies are accountable for ensuring the college has effective policies and procedures in place in line with local and national guidance, and for monitoring the college's compliance with them. Neither the Governing Body nor individual governors have a role in dealing with individual child protection cases or the right to know the detail of cases (except when exercising their disciplinary functions in respect of allegations against a member of staff or investigating a complaint brought to their attention).

The Vice Principal Student Experience and Safeguarding will ensure that:

- There is a listening culture within the college where both staff and children are able to raise concerns about poor or unsafe practices.
- Referrals are made to the Disclosure and Barring Service and/or the Teaching Regulation Agency as appropriate.
- They liaise with the Local Authority Designated Officer where an allegation is made against a member of staff.
- They liaise with the "case manager" and the designated officer(s) at the local authority for child protection concerns in cases which concern a staff member;
- 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
- They liaise with the designated safeguarding lead in respect of any concerns raised about staff or volunteers which do not meet the harm threshold and are dealt with by means of the low level concerns policy or procedure.
- The Designated Safeguarding Lead has a job description in keeping with the requirements of Keeping Children Safe in Education (DFE 2023) and that sufficient time, training and support are allocated to this role, including the appointment of colleagues able to deputise for the Designated Safeguarding Lead who have undertaken the same training and who also have the role explicitly referenced within their job description.
- The curriculum provides opportunities to help students stay safe including when online. Students should be aware of the support available to them.
- The PSHE / safeguarding curriculum is appropriately sequenced to ensure students are taught about key issues in a planned and age/stage appropriate way, building on previous knowledge as they move through the college.
- They quality assure the college's child and vulnerable adults protection practices including the auditing of safeguarding records and the supervision of the safeguarding team to ensure that actions and decisions are reviewed appropriately and that staff's emotional needs are met.
- The college meets its responsibilities under the Prevent Duty (see Prevent Policy) including ensuring there are reasonable checks made on visiting speakers and monitoring and filtering is in place across the college's IT systems.

Raise Awareness

The Vice Principal Student Experience and safeguarding will:

- ensure each member of staff has access to, and understands, the college's child and vulnerable protection policy and procedures, especially new and part-time staff;
- ensure the college's child and adults at risk protection policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with the governing body regarding this;
- ensure the child and adults at risk protection policy is available publicly and parents/carers are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the college in this; and
- 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.

The Campus Leads (delegated responsibility of Designated Safeguarding Lead), under the supervision of the Vice Principal Student Experience and Safeguarding will:

Manage referrals

The designated safeguarding lead (Campus Lead) is expected to:

- refer cases of suspected abuse to the local authority children's/adult's social care as required;
- support staff who make referrals to local authority children's/adult'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 crime may have been committed to the Police as required. The NPCC document [When to call the Police: Guidance for colleges and colleges](#) can support with this.

Work with others

The designated safeguarding lead (Campus Lead) will:

- act as a point of contact with the safeguarding partners;
- liaise with the Vice Principal student Experience and Safeguarding to inform her of issues - especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations. This should include being aware of the requirement for children to have an Appropriate Adult when in contact with Police Officers who suspect them of an offence. The DSL will communicate any vulnerabilities known to the college to a police officer who wishes to speak to a student about an offence and this communication will be recorded on Databridge
- liaise with their team on matters of safety and safeguarding (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies so that student's needs are considered holistically;
- promote supportive engagement with parents and/or carers in safeguarding and promoting the welfare of students, including where families may be facing challenging circumstances;
- act as a source of support, advice and expertise for their campus team;

Personal Development

- raise any areas of learning with the Vice Principal Student Experience and Safeguarding;
- attend safeguarding supervision with the Vice Principal Student Experience and Safeguarding.

The Regional College Leads will:

- provide cover for the Campus Lead;
- provide support and guidance to the campus teams;

- collate safeguarding data from their campuses and present to the Vice Principal Student Experience and Safeguarding, identifying any key areas of concern;
- complete, on a termly basis, a safeguarding SEF that includes all reportable safeguarding data for their region;
- attend safeguarding supervision with the Vice Principal Student Experience and Safeguarding;
- raise any areas of learning with the Vice Principal Student Experience and Safeguarding.

Holding and sharing information

The designated safeguarding lead :

- understands the importance of information sharing with the safeguarding partners, other agencies, organisations and practitioners;
- understands relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR); and
- ensures that detailed, accurate, secure written records of concerns and referrals are maintained and understands the purpose of this record-keeping.

Child/Adult protection file

The Campus Lead is responsible for ensuring that child/adult protection files are kept up to date. Information is kept confidential and stored securely. Records include a clear and comprehensive summary of the concern; details of how the concern was followed up and resolved; and a note of any action taken, decisions reached and the outcome. Files are only accessed by those who need to see it and any sharing of information happens in line with information sharing advice set out in Keeping Children Safe in Education.

Where students leave the college (including for in year transfers) the Campus Lead will ensure their child/adult protection file is transferred to the new educational provider as soon as possible, and within 5 days for an in-year transfer or within the first 5 days of the start of a new term. The file will be transferred separately from the main student file, ensuring secure transit, and confirmation of receipt should be obtained.

In addition to the child/adult protection file, the Campus Lead will also consider if it would be appropriate to share any information with the new educational provider in advance of a student leaving to help them put in place the right support to safeguard the child/vulnerable adult and help the student thrive in the new setting.

Availability

During term time the designated safeguarding lead will always be available (during college hours) for staff in the college to discuss any safeguarding concerns Any member of the team who requires safeguarding advice can either speak with the student's Campus Lead or ring Alison Twomey, Vice Principal Student Experience and Safeguarding, on 07398 796055

9. Training and Induction

All staff and volunteers working in the college must be given a copy of the Child and Adults at Risk Protection policy immediately upon starting work at the college as part of their induction. All staff and volunteers working in the college must complete safeguarding training appropriate to their role as part of their induction and at a minimum of annually thereafter. As part of the requirement for all staff to

undergo regular updated safeguarding training (including online safety which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring), safeguarding training will be integrated, aligned and considered as part of the whole college safeguarding approach and wider staff training and curriculum planning. The college's safeguarding training plan will build upon existing staff knowledge, in addition to refreshing key knowledge, and will be pertinent to the needs of the college community.

The Designated Safeguarding Lead must complete safeguarding training relevant to their role. This level of training must be refreshed at least every two years, with further safeguarding training to be accessed on a minimum of an annual basis as best practice. This is to ensure designated staff have appropriate, up to date knowledge and skills which will enable them to identify concerns and make decisions that support the safety of the college community.

The governing body should receive appropriate safeguarding and child/adult at risk protection (including online safety) training at the point of induction. This training should equip them with the knowledge to provide strategic challenge to test and assure themselves that policies and procedures are effective and will support the delivery of a robust whole college approach to safeguarding. The Link Governor for Safeguarding should attend appropriate training to enable them to fulfil the expectations of the role.

All staff have had opportunity for Prevent training either through face to face training or access to online resources: <https://www.support-people-vulnerable-to-radicalisation.service.gov.uk/>

The college will keep a safeguarding training log evidencing the training attended by the different groups of staff/governors and will seek to evidence the ongoing impact of this training.

10. Procedures for reporting child protection, child welfare or vulnerable adult concerns:

- All members of the college community have a statutory duty to safeguard and promote the welfare of children, young people and vulnerable. Staff and governors should not investigate possible abuse or neglect themselves.
- All concerns should be reported **without delay** directly to the Designated Safeguarding Lead, Regional College Lead or Vice Principal Student Experience and Safeguarding. This should be followed by a written account of the concerns completed on Databridge.
- Consideration will need to be given to immediately protecting the child/adult at risk and contacting the police and/or ringing for an ambulance if the child is injured.
- The Designated Safeguarding Lead will take immediate action without delay and will make a referral to children's/adult at risk services by telephone if a student is believed to be suffering or likely to suffer significant harm. This referral will always be followed up in writing
The Designated Safeguarding Lead will follow the the Local Safeguarding Children Partnership or Local Adult Safeguarding Board (LSCP/LSAB) and Local Authority multi-agency procedures and consider the student's needs alongside the LSCP' Levels of Needs/Responding to Needs Framework (Threshold document) and consider whether an early help assessment or referral to children's services is needed.
- Concerns about a child should always lead to help for a child. The college may need to escalate its concerns with Children's/Adults Services to ensure a referral is accepted or work with other agencies to ensure an Early Help Assessment is completed.
- The college will always seek to follow the LSCP/LSAB procedures which can be found on their website.

- If college does not receive feedback within one working day regarding the outcome of a referral made to Children's/Adult's Services, the Designated Safeguarding Lead will contact them immediately to determine the outcome of the referral.
- If college disagrees with the outcome of a referral, the Designated Safeguarding Lead will ask to speak to the social worker and/or manager who made the decision. Following this conversation, if they remain dissatisfied, they will follow the Local Safeguarding Children Partnership or Local Safeguarding Adult Board Escalation and Resolution Procedures.

Part 1 of Keeping Children Safe in Education (DFE 2023) provides key flowcharts and guidance to support staff and volunteers' understanding and decision making. This will support staff to make a referral themselves should that become necessary. The Designated Safeguarding Lead should be informed, as soon as possible, following the need for another member of staff to make a referral.

Guidance is also available on the NSPCC website: www.nspcc.org.uk/keeping-children-safe/

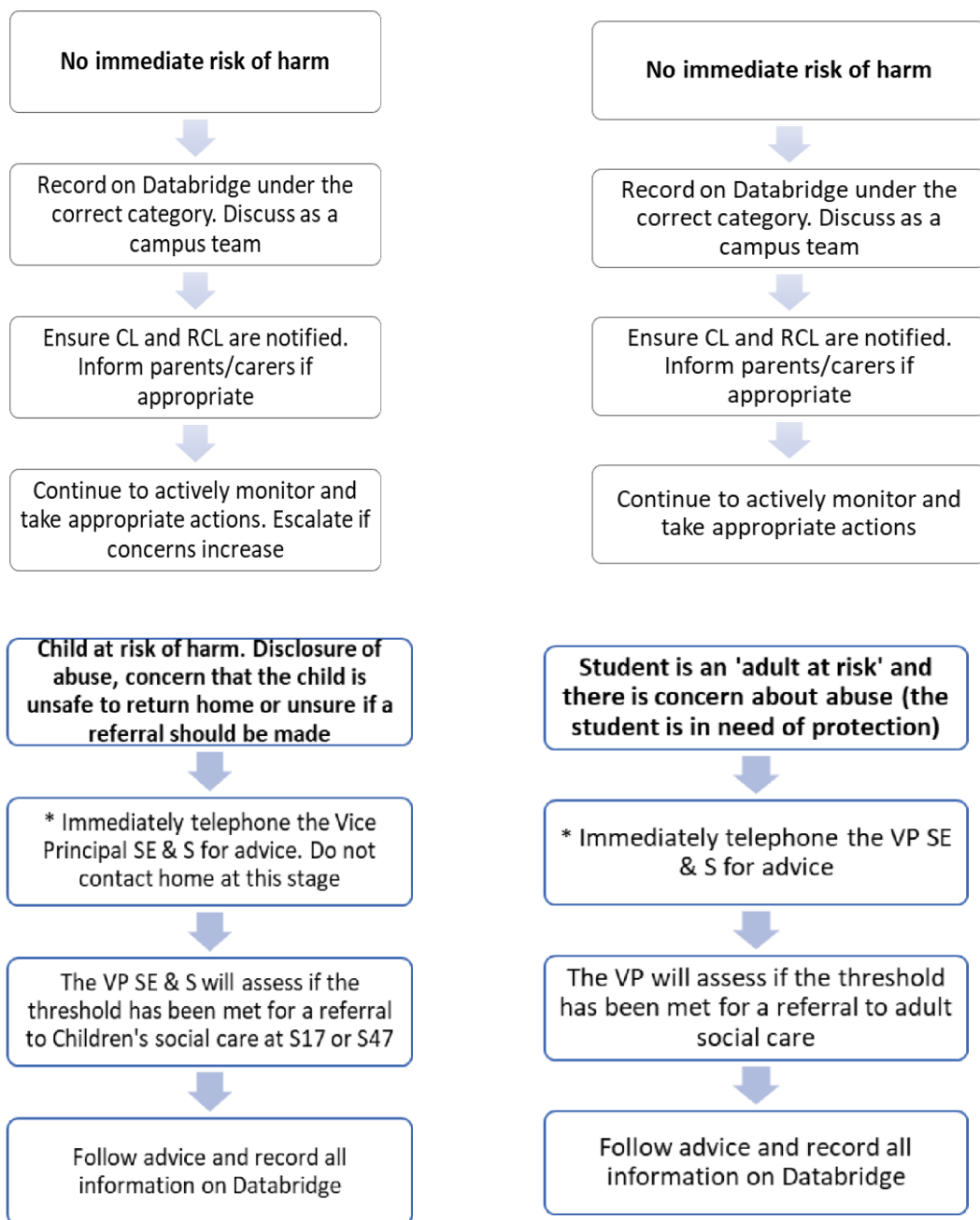
If a teacher in the course of their work in the profession, discovers that an act of Female Genital Mutilation appears to have been carried out on a girl under the age of 18 the teacher must report this to the police. Keeping Children Safe in Education provides additional guidance.

Concerns that a child is being radicalised should follow the normal safeguarding referral mechanism with an additional Channel or Prevent referral being made to the Local Authority's Prevent and Channel team. Contact details can be found in the College's Safeguarding Handbook.

All members of the team are required to follow the safeguarding flow charts below. If in any doubt about the correct route to take, please contact Alison Twomey, Vice Principal Student Experience and Safeguarding on 07398 796055

Recording concerns about a child

Recording concerns about an adult student



* If the VP SE & S is not available to take your call, contact Children’s Social Care for advice. You will contact the local authority where the child lives. Their telephone number / advice line is available in this document and online

*If the VP SE & S is not available to take your call, contact Adult’s Social Care for advice. You will contact the local authority where the student lives. Their telephone number / advice line is available online

11. Process to follow if a student makes a disclosure

If a student makes a disclosure of abuse, staff should:

- Listen and keep calm. Do not interrupt
- Not promise the student that they will keep the matter confidential. Explain to the student who they will need to tell and why
- Observe visible bruises and marks, but should not ask a student to remove or adjust their clothing to view them
- Keep questions to a minimum as their role is not to investigate. If staff need to ask questions in order to ascertain whether this is a safeguarding concern, they should ensure they are open questions
- Use the “TED” model for asking open ended questions: “Tell me about that”, “Explain that to me”, “Describe that”
- Make a record of what has been said immediately afterwards in words used by the student and the member of staff to the best of their memory. Use capital letters for the student’s words to help distinguish between the two.
- Note anything about the student which is connected i.e. any visible injuries including the position and description, the demeanour of the student i.e. crying, withdrawn etc.
- Clearly indicate whether fact, opinion or third party information
- Report the matter immediately to the Designated Safeguarding Lead who will take over responsibility for any referrals or actions arising
- Seek advice from the Designated Safeguarding Lead if in doubt
- Record the incident on Databridge as soon as possible following the incident and always on the same day

Staff should not:

- Ask leading questions, put words into the student’s mouth or press for details
- Rush the student
- Examine the student
- Investigate
- Promise confidentiality
- Summarise or use your own words to describe events
- Delay sharing the information with the Designated Safeguarding Lead

All staff should also be aware that students 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, students may feel embarrassed, humiliated, or being threatened. This could be due to their vulnerability, disability and/or sexual orientation or language barriers. This should not prevent staff from having a professional curiosity and speaking to the DSL if they have concerns about a student. It is also important that staff determine how best to build trusted relationships with students which facilitate communication.

12. Confidentiality, information sharing, record transfer and record keeping and retention

Information sharing is vital in identifying and tackling all forms of abuse and neglect, and in promoting children’s and vulnerable adult’s welfare, including their education outcomes. Colleges have clear powers to share, hold and use information for these purposes.

The college recognises that all matters relating to child and vulnerable adult protection are confidential. The Designated Safeguarding Lead will disclose any information about a student to other members of staff on a ‘need to know basis’ only. Guidance about sharing information can be found in the 2018

document [Information Sharing: Advice for Practitioners providing safeguarding services to children, young people, parents and carers 2018](#) and the [Data protection: toolkit for colleges](#). The college understands the need to keep safeguarding records securely.

Staff cannot promise students confidentiality but must always act in the best interests of the child or vulnerable adult and share disclosures made by the student or others with the Designated Safeguarding Lead. All staff are aware that they have a professional responsibility to share information with other agencies in order to safeguard students.

The college will aim to seek consent of parents of children under the age of 18 before sharing information with other agencies, however legislation states that colleges and other agencies can share information without the consent of a parent/carer in particular circumstances.

The college pays due regard to the relevant data protection principles which allow us to share personal information, as provided for in the [Data Protection Act 2018](#) and the [General Data Protection Regulation](#) (GDPR). The college is aware of the processing conditions under the Data Protection Act 2018 and the GDPR which allow college to store and share information for safeguarding purposes, including information which is sensitive and personal, and this is treated as 'special category personal data'. Where college would need to share special category personal data, we are aware that the Data Protection Act 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows us to share information. This includes allowing college to share information without consent, if it is not possible to gain consent, it cannot be reasonably expected that we can gain consent, or if to gain consent would place a child at risk.

*'The Data Protection Act 2018 and UK GDPR **do not** prevent the sharing of information for the purposes of keeping children safe and promoting their welfare...
...Fears about sharing information **must not** be allowed to stand in the way of the need to safeguard and promote the welfare of children' (DfE 2023)*

The college will retain records in keeping with Local Authority guidance and NSPCC guidelines: <https://learning.nspcc.org.uk/research-resources/briefings/child-protection-records-retention-storage-guidance>. <https://irms.org.uk/page/SchoolsToolkit>

13. Managing allegations against adults (including all staff, supply teachers and volunteers) working at or on behalf of the college

All college staff and other adults working at or on behalf of the college are made aware of and work within the college's Code of Conduct and other relevant policies and procedures. The Staff Code of Conduct includes guidance for staff regarding the college expectations of the use of mobile phones, electronic equipment and social media.

All staff and volunteers must report any concerns about a member of staff's behaviour towards children (including supply staff and volunteers) to the Vice Principal Student Experience and Safeguarding who will act as the case manager. Concerns can also be discussed with the Designated Safeguarding Lead. Concerns about the Vice Principal Student Experience and Safeguarding should be raised with the Chief Executive Officer. Concerns about the Chief Executive Officer or the Principal should be raised with the nominated safeguarding governor.

Local Safeguarding Children Partnership multi-agency procedures will be followed in all cases where it is alleged that a member of staff has:

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

In some circumstances, the college will have to consider an allegation against an individual who is not directly employed by the organisation and where our disciplinary procedures do not fully apply (for example supply teachers). Whilst the college is not the employer of the individual, we still have responsibility to ensure allegations are dealt with properly and will liaise where appropriate with relevant parties. The college will not cease to use the services of a supply teacher as a result of safeguarding concerns, without finding out the facts and liaising with the the Local Authority Designated Officer (LADO) to determine a suitable outcome.

Concerns can also be taken directly to LADO, if needed, via Children's Services.

Part 4 of the DFE guidance Keeping Children Safe in Education provides further guidance. In addition to the college's own procedures, multi-agency procedures can be found on the college's website.

There are occasions when a person who works with children behaves in a way that is concerning and raises questions about their ability to recognise and take steps to safeguard children in their care that may not always meet the threshold of LADO. As an employer the college has a duty to consider whether the issue indicates that they are unsuitable to continue in their role for the immediate future or indefinitely. These are known as issues of suitability and if they do not meet the harm threshold for allegations they, would be dealt with via the college's disciplinary and low level concerns procedures. Issues of suitability can include:

- Where an employee is being investigated for an offence against an adult, or
- Their behaviour in their personal lives brings into question their suitability to work with children

However if an adult who works with children has involvement from Children's Services in respect of their own child, or a child that they live with or have contact with, it is the responsibility of Children's Services to assess the immediate concern and inform the LADO of whether the adult poses a risk to children. Examples of this may include:

- Allegations of assault, physical or emotional, on their own child or on a child they live with or have contact with
- Domestic abuse
- Substance misuse
- Lives with or is in a relationship with a person who is identified as a risk to children

The situation would meet the threshold of LADO should the child in question be made subject to a Child Protection plan. This is because Children's Services has determined that the adult presents a risk to the associated child either directly or due to a failure to protect.

If college are made aware of any of the circumstances detailed above, they will have a consultation with the LADO in order to determine whether the threshold is met for a referral under the managing allegations process.

All staff should ensure that they disclose information about themselves relating to the above to the Chief Executive Officer as soon as possible. Pinc College will create an environment and culture where staff are supported and empowered to be able to do this.

14. Low Level Concerns

Our college recognises that there may be times when there are concerns about a professional's behaviour which do not meet the harm threshold as set out in section 15 of this policy. This includes third party staff and volunteers. Concerns such as this may arise in several ways and from a number of sources. Examples of this may be:

- suspicion, complaint or disclosure made by a student, parent/carer or other adult within or outside of our college; or
- as a result of vetting checks undertaken during recruitment

Our college promotes an open and transparent culture in which all concerns about adults working in or on behalf of the college are dealt with promptly and appropriately. Creating this culture in which all concerns are shared responsibly, in a timely way with the right person, and are recorded and dealt with appropriately is critical to effective safeguarding practice. This culture enables the college to identify concerning, problematic or inappropriate behaviour at the earliest possible stage, minimises the risk of abuse and ensures that all adults working in or on behalf of the college are clear about professional boundaries and act within these, in accordance with our ethos and values. This culture also empowers individuals to share concerns with key staff about their own behaviour at the earliest possible opportunity.

The term 'low level concern' does not mean that the behaviour is insignificant. It means a behaviour towards a child which does not meet the threshold set out in section 15 of this policy and part 4 of Keeping Children Safe in Education 2023. A low level concern is any concern (no matter how small, and even if no more than causing a sense of unease) that an adult working in or on behalf of the college may have acted in a way that:

- is not consistent with the staff code of conduct, including conduct outside of the workplace, and/or
- does not meet the allegations threshold or is otherwise not considered serious enough for a referral to the LADO.

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

- being over friendly with students;
- having favourites;
- taking photographs of students on their mobile phone;
- engaging with a student on a one-to-one basis in a secluded area or behind a closed door; or,
- humiliating students.

Behaviours which are not consistent with the standards and values of our college, and which do not meet the expectations set out in our code of conduct for staff, must be addressed. Behaviours such as this, can exist on a spectrum from inadvertent or thoughtless, or behaviour that may look to be inappropriate, but might not be in specific circumstances, through to that which is ultimately intended to enable abuse.

It is essential that concerns such as this are shared responsibly and with the right person, and that they are recorded and dealt with appropriately. Effective reporting and management of such concerns also protects staff from potential false allegations of misunderstandings. Concerns should be shared as soon as is reasonably possible, and ideally within 24 hours of becoming aware of a problem, however it is never too late to share a concern.

Occasionally a member of staff may find themselves in a situation which could be misinterpreted, or may appear compromising to others. Equally, a member of staff may have behaved in a manner which, on reflection, they consider to fall below the standards set out within our code of conduct for staff. Self-reporting such circumstances is actively encouraged as it allows issues to be dealt with at the earliest opportunity and it is an important means of maintaining our culture of everyone aspiring to have the highest standards of conduct and behaviour.

Staff do not need to be able to determine whether their concern is a low level concern, or if it would be dealt with under our managing allegations policy. Staff must simply be empowered to share their concern. The determination regarding process will be made by the Vice Principal Student Experience and Safeguarding

Low level concerns should be reported in writing to the Vice Principal Student Experience and Safeguarding. Where a low level concern is in relation to the Vice Principal, it should be shared with the College Principal. Concerns about the College Principal or Chief Executive Officer should be reported to the nominated safeguarding governor.

If a report of a low level concern is received, it will be dealt with responsively, sensitively, and proportionately. Where a concern is reported, the Principal should collect as much evidence as possible by speaking directly with the person who raised the concern (unless it has been raised anonymously), and by speaking to the individual involved along with any witnesses. The information collected will help to categorise the behaviour and determine what further action may needed to be taken. Support and advice will be provided to ensure any identified behaviours can be corrected at an early stage.

All low level concerns will be recorded in writing and this record should include the details of the concern, the context and the action taken, including the rationale for any decisions. Records must be kept confidential and held securely on Databridge, in line with the Data Protection Act 2018 and the UK General Data Protection Regulation. Records will be kept in individual personnel files and will be retained for the duration of the individual's employment.

Records should be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, college will decide on a course of action either through our disciplinary procedures or where a pattern of behaviour moves from a concern to meeting the harms threshold, referral to LADO.

The Vice Principal will regularly review all low level concerns reported to them, along with the outcome of the concern. This is to ensure there is appropriate scrutiny and analysis of information in order to agree at what point a series of low level concerns or a pattern of behaviour would escalate and meet

the threshold set out in section 15 of this policy and part 4 of Keeping Children Safe in Education 2023. Data, and outcomes, relating to low level concerns will be shared with the Governing Body

Low level concerns will not be included in references unless they relate to an issue which would normally be included in a reference. Paragraph 441 of Keeping Children Safe in Education specifies:

15. Allegations of abuse against another student (child on child or peer on peer abuse), including issues of sexual violence and harassment

Staff recognise that students are capable of abusing other students, and that not all students will find it easy to tell staff about their abuse verbally. Students can show signs or act in ways that they hope adults will notice and react to. In some cases, the victim may not make a direct report, for example a friend may make a report or a member of staff may overhear a conversation. It is essential that all victims are reassured that they are being taken seriously, regardless of how long it has taken them to come forward, and that they will be supported and kept safe. Victims will never be given the impression that they are creating a problem by reporting an incident and they will never be made to feel ashamed or their experience minimised.

Staff must act on the assumption that students may be experiencing sexual violence or harassment, even if there are no specific reports of such behaviour. Staff must ensure that they challenge any form of derogatory and sexualised language or behaviour. Staff are vigilant to recognise sexualised/aggressive touching/grabbing, particularly towards girls or other vulnerable groups of children. Behaviours by students will never be passed off as ‘banter’, ‘having a laugh’ or ‘part of growing up’ as this can lead to an unsafe culture which normalises abuse and inappropriate behaviours and can lead to students accepting it as normal and therefore not reporting such issues. Our college will prevent sexual harassment, online sexual abuse and sexual violence through its carefully planned and sequenced PSHE curriculum alongside effective challenge and response to specific issues when they arise. All staff will reassure victims that they are being taken seriously and that they will be supported and kept safe.

All concerns are reported and discussed with the Designated Safeguarding Lead, or senior member of staff. Behaviours can happen in college, online or in the community and are most likely to include, but not limited to:

- abuse within intimate personal relationships between peers;
- bullying (including cyber bullying, prejudice-based and discriminatory bullying);
- serious violence;
- 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”, taunting and online sexual harassment which may be standalone or part of a broader pattern of abuse;
- sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names;
- physical behaviour, such as: deliberately brushing against someone, interfering with someone’s clothes;
- displaying pictures, photos or drawings of a sexual nature;
- causing someone to engage in sexual activity without consent;
- online sexual harassment including consensual and non-consensual sharing of nude and semi-nudes images and/or videos, sharing of unwanted explicit content, sexualised online bullying, unwanted sexual comments and messages including on social media, sexual exploitation, coercion and threats

and coercing others into sharing images of themselves or performing acts they are not comfortable with online;

- upskirting, which typically involves taking a picture under a person's clothing without their permission (this is a criminal offence);
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm; and
- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and many also include an online element).

When responding to reports of child on child or peer on peer abuse, the Designated Safeguarding Lead will respond to each report on a case-by-case basis. If an allegation is potentially criminal in nature, a report will be made to the Police. This will generally be in parallel to a referral to children's services. College can refer to the NPCC guidance [When to call the Police](#) for additional support.

The college will also handle reports which include an online element carefully. This includes being aware of [Searching, screening and confiscation: advice for colleges](#) and [UKCIS Sharing nudes and semi-nudes: advice for education settings working with children and young people](#).

Children and vulnerable adults with special educational needs and disabilities are more vulnerable to sexual violence and harassment and staff should be aware that additional barriers can exist when recognising abuse in this cohort. The fact that a student may be LGBT is not in itself an inherent risk factor for harm however children, young people and young adults who are LGBT+ or perceived to be, may also be targeted by their peers and harassed or assaulted. Risks can be compounded where students who are LGBT lack a trusted adult with whom they can be open. It is therefore vital that all staff endeavour to reduce the additional barriers faced, and provide a safe space for students to speak out or share their concerns.

Being subjected to harassment, violence and or abuse, including that of a sexual nature, may breach any or all of the protections set out under the **Human Rights Act 1998**, depending on the nature of the conduct and the circumstances.

Victims of child on child sexual harm will be supported by the college's pastoral system and referred to specialist agencies including, for example, 'CAMHS', 'Brook' and 'Barnardo's'. When there has been a report of sexual violence, the designated safeguarding lead will make an immediate risk and needs assessment. Where there has been a report of sexual harassment, the need for a risk assessment will be considered on a case-by-case basis. Risk assessments will be recorded on Databridge and will be kept under regular review.

Additional guidance is available on the NSPCC website:

<https://learning.nspcc.org.uk/child-abuse-and-neglect/online-abuse>

16. Students at risk of Serious Violence and/or Child Criminal or Sexual Exploitation

All staff are made aware of the indicators which may suggest a student is at risk from, or is involved with serious violent crime or sexual exploitation. The indicators may include:

- appear with unexplained gifts, money or new possessions;
- associate with other children involved in exploitation;
- have been the victim or perpetrator of serious violence (e.g. knife crime);

- suffer from changes in emotional well-being;
- misuse drugs and alcohol;
- go missing for periods of time or regularly come home late and are found in areas away from their home;
- are found in accommodation that they have no connection with; and
- regularly miss college or education or do not take part in education.
 - A change in friendships or relationships with older individuals or groups;
- A significant decline in performance;
- Signs of self harm or a significant change in wellbeing; or
- Signs of assault or unexplained injuries

All staff are aware of the range of risk factors which increase the likelihood of involvement in serious violence, such as being male, having been frequently absent or permanently excluded from college, having experienced abuse or neglect and having been involved in offending such as theft or robbery.

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

There are a range of other factors that could make a child more vulnerable to exploitation, including gender, sexual identity, cognitive ability, learning difficulties, communication ability, physical strength, status, and access to economic or other resources.

The experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same. Both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

Child sexual exploitation is child sexual abuse. Exploitation of this nature can be a one off occurrence and may happen without the child's immediate knowledge e.g. through the sharing of videos or images. It can also affect any child who has been coerced into engaging in sexual activities. This includes 16 and 17 year olds who can legally consent to have sex. Some children may not realise they are being exploited e.g. because they believe they are in a genuine relationship.

Our college understands that children who have been exploited or are at risk of serious violence, will need additional support to help maintain them in education. Further guidance is provided to staff in Section 1 of the Colleges' Safeguarding Handbook.

17. Domestic Abuse

All staff and volunteers are aware that domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional. Children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn.

The [Domestic Abuse Act 2021](#) recognises children as victims of Domestic Abuse in their own right and sets out statutory multi-agency responsibilities, including specific responsibilities on education providers. Amongst other things, these include how colleges deliver an effective PSHE / RSHE curriculum which supports children to recognise and report feelings of being unsafe, and covers the concepts of, and laws relating to, sexual consent, sexual exploitation, abuse, grooming, coercion, harassment, rape, domestic abuse, forced marriage, 'honour'-based abuse and FGM, and how these can affect current and future relationships.

18. Students requiring mental health support

Our college recognises that it has an important role to play in supporting the mental health and wellbeing of our students. We also recognise that in some cases, mental health problems can be an indicator that a student has suffered, or is at risk of suffering abuse, neglect or exploitation. Within our college we adopt a whole college approach to mental health and wellbeing, which includes promoting positive mental health, wellbeing and resilience across the whole college community.

19. Monitoring attendance

A child missing from an education setting is a potential indicator of abuse or neglect, including exploitation. Local Authority guidance and procedures will be followed for dealing with a child who is missing from education, particularly on repeated occasions or if a child suddenly stops attending. Pinc College will ensure that our response is in line with [Working together to improve college attendance](#) DFE 2022.

Attendance will be closely monitored. In line with the college's attendance and engagement policy, the attendance of children with known welfare and attendance concerns will be monitored closely, particularly those with chronic poor attendance or severe or persistent absentees, or if a child suddenly stops attending. Similarly, the attendance of children who are vulnerable or with known welfare and safeguarding concerns such as children who have a child protection plan, a child in need, are Children Looked After and/or SEN will be rigorously monitored on a daily and weekly basis. The child's social worker will be informed immediately when there are unexplained absences or attendance concerns.

The college will seek to ensure it has at least three emergency contacts for each family and consider what urgent action it may need to take when a child/vulnerable adult and family are not contactable, and the student has not attended college. Where necessary, this may include reporting the child or vulnerable adult missing to the police.

Staff understand the signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns such as travelling to conflict zones, Female Genital Mutilation and forced marriage.

20. Private fostering

Colleges have a mandatory duty to report to the local authority if they believe a child is subject to a private fostering arrangement. (This does not include close family relatives e.g. grandparent, brother, sister, uncle or auntie.) This means making a referral to children's services. A private fostering arrangement is made without the knowledge of the local authority for the care of a child under the age of 16 years (under 18 for children with disabilities) whereby the child is in the care of someone other than their parent or close relative.

21. Safer recruitment

The college ensures that all appointments follow its recruitment policy and the guidance set out in Keeping Children Safe in Education (DFE 2023). At least one member of the appointments panel will have undertaken safer recruitment training. The college undertakes the required DFE pre-employment checks and where appropriate records these checks on the single central record and retains evidence in personnel files. The college's Safer Recruitment Policy and Procedures set out the processes in more detail.

22. The Safeguarding Curriculum

The college has a curriculum map which sets out how to help students keep themselves safe from harm. Students are provided with skills, knowledge and understanding to help them recognise and respond to issues such as consent and healthy relationships. Students are supported to develop their understanding of risks including: when using technology, the internet, and risks associated with grooming and radicalisation, gang and criminal exploitation and misusing drugs and alcohol. The curriculum includes specific learning to address sexual harassment, online abuse, sexual violence and issues of consent in an age and stage appropriate way. Our college recognises that a one size fits all approach may not be appropriate for all students, and a more personalised approach for more vulnerable students and victims of abuse may be necessary. The college curriculum promotes an understanding of the values needed to live within a democratic society including the rule of law, and individual liberty. It will promote tolerance and respect for all faiths (and those of no faith), races, genders, ages, disability and sexual orientations.

23. Escalation

If any member of staff is unhappy with the response they have received in relation to a safeguarding concern they have raised, it is their responsibility to ensure they escalate their concern within the organisation. All members of staff are aware of their responsibility to escalate and refer concerns on to Children's or Adult's Services when it is appropriate to do so.

Where professional disagreement occurs and the Designated Safeguarding Lead are unhappy with the actions or decisions of another agency, they will escalate their concern in line with the Local Safeguarding Children Partnership's formal escalation policy to ensure a timely resolution.

24. Proactive Safeguarding

Our college recognises that college plays a significant part in the prevention of harm to our children by providing them with opportunities to learn, good lines of communication with trusted adults, supportive peers and an ethos of protection. As a result, safeguarding and child protection is at the heart of everything and underpins all policy and procedures within our college.

Our college recognises that we may provide the only stability in the lives of children who have been abused or who are at risk of harm.

Our college recognises that safeguarding incidents and/or behaviours can be associated with factors outside the college or can occur between children outside the college. All staff, but especially the Designated Safeguarding Lead should consider the context within which such incidents or behaviours occur. This is known as contextual safeguarding, or extra-familial harm, which means assessments of children should consider whether wider environmental factors are present in a child's life that are a threat to their safety and/or welfare.

In order to maintain a whole college approach to safeguarding, our college community will:

- Work to establish and maintain an ethos where children feel secure and are encouraged to talk and are always listened to. This ethos will be modelled and replicated by staff and governors.
- Promote a caring, safe and positive environment within the college.
- Ensure that the college site is a safe, secure and welcoming place to learn and grow.
- Encourage self-esteem and self-assertiveness through the curriculum as well as through personal relationships, whilst not condoning aggression or bullying.
- Include regular consultation with students e.g. through safety questionnaires, participation in anti-bullying week, etc.
- Ensure that all students know there is an adult in the college whom they can approach if they are worried or in difficulty.
- Offer a positive college experience.
- Ensure all staff are aware of college guidance for their use of mobile technology and have discussed safeguarding issues around the use of mobile technologies and their associated risks
- Ensure that all staff, volunteers, governors, policies and procedures operate with the best interests of the child at their heart.

25. Monitoring and Quality Assurance

Monitoring and evaluation is carried out throughout the year by the Vice Principal Student Experience and Safeguarding by checking whether the standards from the child and vulnerable adults protection policy are implemented and whether safeguards are working. Findings will be included in the Principal's report to the Governing Body. Activities which may form part of the ongoing monitoring of effectiveness are:

- Scrutiny of the Single Central Record and personnel files to ensure pre-employment checks are robust and up-to-date, and that job descriptions for new positions include reference to child protection
- Confirmation that training has been undertaken according to planned schedule and that all relevant staff and volunteers have participated
- There is effective analysis of safeguarding data including bullying, attendance, exclusions, behaviour logs, students taken off roll, the views and progress and participation of vulnerable students. In particular, the college will monitor the link between attendance and safeguarding and those persistently absent, frequently late, missing college (including part of the college day) or those who suddenly stop attending.
- Regular meetings with staff, volunteers and students which include the opportunity to discuss safeguarding and child protection, or use of questionnaires to evidence this
- Safeguarding learning walks designed to evidence and test out key safeguarding standards
- Adapting and amending the policy and procedures outside of their annual review date to reflect current issues which may have recently arisen in order to ensure that all students are protected at all times.

Version number	
SLT Member responsible for policy	Alison Twomey
Board approval Date	PENDING
Date of Next Review	