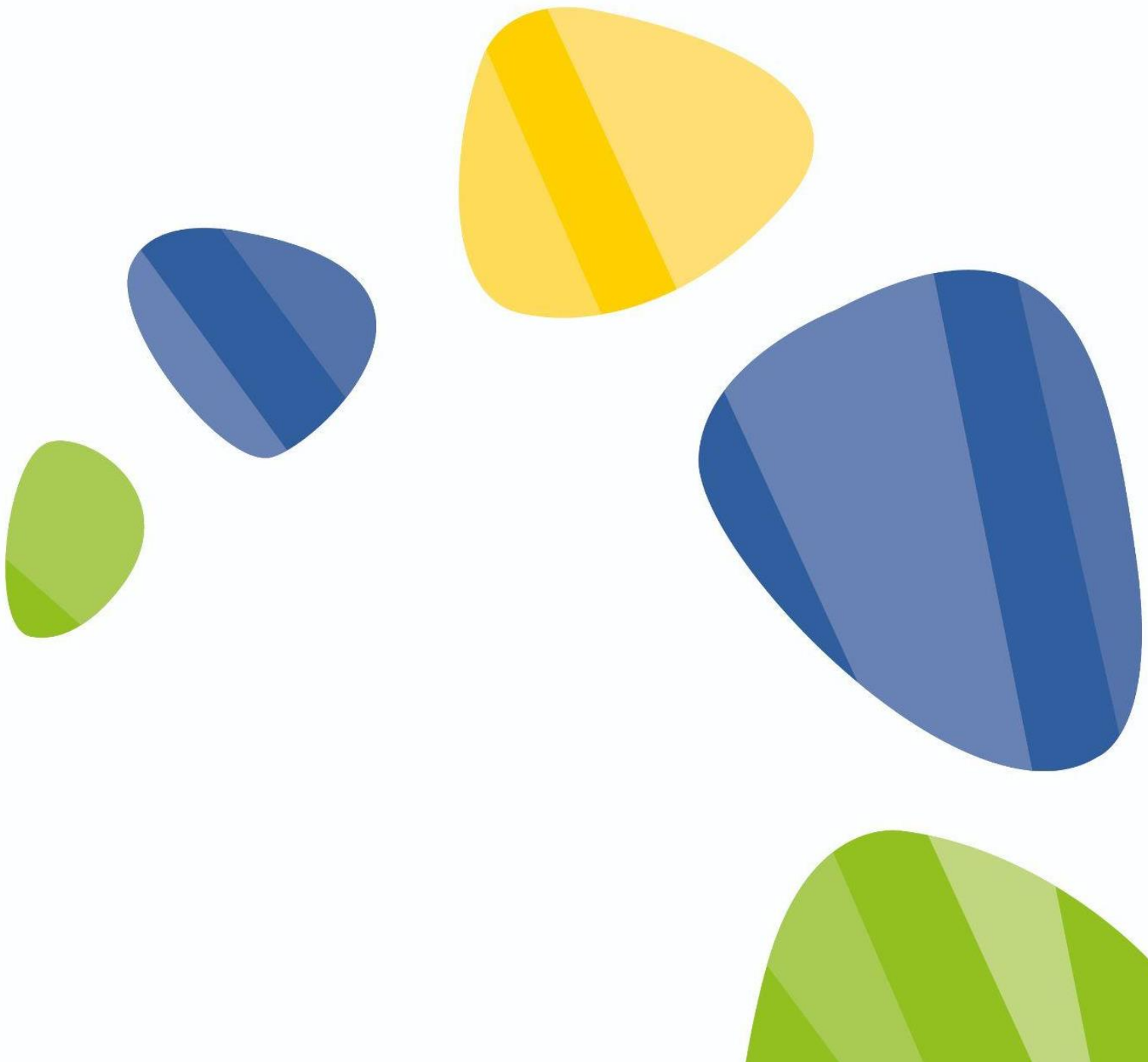




Vulnerable Adult, Child Protection and Safeguarding Policy and Procedures



About this document:

Purpose

This policy is written to ensure all students, staff, parents, Governors, Inspectors, the LA and other relevant stakeholders are fully aware of the purpose, nature of the Child Protection and Safeguarding Policy to ensure that everyone is aware of how we safeguard student/interns to identify possible signs of abuse and to help keep themselves safe.

Complied by: Kevin Latham & Gareth Ivett	Date: August 2023
Committee: Board of Directors	Date agreed by Directors: September 2023
Review Cycle: Annually	Review Date: August 2024

Wellbeing in our Trust

We are all affected by poor physical and mental health at times during our lives and it is important the appropriate support is available in a timely manner.

Health and wellbeing is everyone's responsibility and we encourage an open and honest culture whereby anyone can discuss any issues they may have.

The Trustees of Creating Tomorrow take the health and wellbeing of all employees seriously and are committed to supporting our staff. The Trustees ensure that support for staff is available through:

- Effective line management
- Commitment to reducing workload
- Supportive and professional working environments
- Employee support programs
 - Health Assure (confidential counselling support available through Perkbox account).
 - Education Support: telephone number 08000 562561 or website www.educationsupport.org.uk

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**Throughout this policy the terms ‘trustees’ and ‘governors’ are used. For this policy:
* trustees refers to Directors of the College who have governance responsibility.
* executive directors refers to the senior management team of the college.**

1. Key Safeguarding Contacts

At *Creating Tomorrow College*, the named personnel with designated responsibility for safeguarding are:

Name	Contact Details
Carole Wilson-Frizzell Director of College (performance & Standards), Lead Designated Safeguarding Lead	cwilsonfrizzell@creatingtomorrowcollege.co.uk 07485 303128
Gareth Ivett Principal, Deputy Designated Safeguarding Lead	givett@creatingtomorrowcollege.co.uk 07990 012330
Asia Malinowska Operations Manager, Deputy Designated Safeguarding Lead	amalinowska@creatingtomorrowcollege.co.uk 07485314289
Sarah Grist Campus Leader, Deputy Designated Safeguarding Lead	sgrist@creatingtomorrowcollege.co.uk 07483 037970
Kevin Latham Deputy DSL CEO	KLatham@creatingtomorrowtrust.co.uk 01536 856467 / 07825915272

The named personnel with Designated Responsibility regarding allegations against staff are:

Designated Senior Manager	Deputy Designated Senior Manager	Chair of Trustees (in the event of an allegation against the Principal or Trust Leadership Team)
Gareth Ivett Principal	Carole Wilson-Frizzell, Director of College	Jeanette Payne jpayne@creatingtomorrowtrust.co.uk <i>*Numbers can be obtained from Ellie Edwards</i>

Name and contact details of the link governor/s for safeguarding

Name	Contact Details
<i>Chair of Governors</i>	Frank Shore fshore@isebrookschoo.co.uk
<i>Safeguarding Governor</i>	Andrew Green agreen@creatingtomorrowcollege.co.uk
<i>Janet Duggan</i> <i>Safeguarding Trustee</i>	JDuggan@creatingtomorrowtrust.co.uk
<i>Jeanette Payne</i> <i>Chair of Trustees</i>	JPayne@creatingtomorrowtrust.co.uk <i>*Numbers can be obtained from Ellie Edwards</i>

Our Data Protection Officer is:	Our Lead for Mental Health is:	Our Prevent SPOC is:
Ali Jones (IT Infrastructure Manager / GDPR Info Manager) ajones@creatingtomorrowtrust.co.uk	Asia Malinowska Contact details above.	Carole Wilson-Frizzell Contact details above

Name and contact details of the Designated Officer (DO)

Name	Contact Details
Andy Smith <i>Designated Officer (West Northants)</i>	07850 854309 LADOConsultations@nctrust.co.uk
Sheila Kempster Designated Officer	07831 123193 LADOConsultations@nctrust.co.uk

Other contact Numbers

Name	Contact Details
<i>Northants - MASH Multi Agency Safeguarding Hub (option 1, option 1)</i>	<i>North 0300 126 3000 West 0300 126 7000</i>
<i>Prevent Engagement Officers at Northamptonshire Police</i>	prevent@northants.pnn.police.uk
<i>Prevent - Action Counters Terrorism (ACT)</i>	https://actearly.uk/ 0800 0113 764
<i>Channel Helpline</i>	020 7340 7264

2. Aim of policy

Creating Tomorrow College recognises our statutory responsibility to safeguard and promote the welfare of all student/interns. We will endeavour to provide a safe and welcoming environment where student/interns are respected and valued. All support for student/interns and young people will be based on their individual needs and rights, this is a person-centered approach to safeguarding (authentic safeguarding), with the child/young person at the heart. When working to safeguard student/interns and young a person-centred approach will be used which means that any procedures consider the rights, feelings, and experience of the individual young person.

We will be alert to the signs of abuse and neglect and follow our procedures to ensure that student/interns receive effective support, protection and justice.

Safeguarding is everyone's responsibility. We recognise that our college is part of a wider safeguarding system and work closely with the Northamptonshire Safeguarding Children Partnership and Northamptonshire Safeguarding Adults Board and other agencies to promote the welfare of student/interns. We maintain an attitude of 'it could happen here' and will consider the wishes of, and at all times, what is in the best interests of each young person.

We understand that student/interns can be abused by adults or by other student/interns. We are committed to creating a culture of safety, that minimises the opportunity for any form of abuse (including all forms of peer on peer abuse) through training, education and robust response procedures.¹

The aim of this policy is to;

- promote safeguarding and vulnerable adult/child protection and to provide information about how we work to keep student/interns safe;
- ensure that all staff are aware of and clearly understand their statutory safeguarding responsibilities;
- provide all members of staff with the information required to meet their safeguarding duty and protect student/interns from harm;
- provide stakeholders with clear information relating to the college's

¹ For full details about how we work to prevent and respond to child on child abuse, please see Appendix B.

- safeguarding and vulnerable adult/child protection procedures; and to
- ensure that we are protecting student/interns from maltreatment or harm.

#Creating Tomorrow Academies Trust is an education charity that run schools and aims to make sure that all children have the opportunity to succeed. Creating Tomorrow College is a subsidiary of the trust.

3. Scope

This policy applies to all teaching, non-teaching, support, supply, peripatetic, contract staff, governors, volunteers and trustees working in or on behalf of **college**. All references in this document to 'staff' or 'members of staff' should be interpreted as relating to the aforementioned unless otherwise stated.

4. Definitions

Safeguarding and promoting the welfare of children is defined in Keeping Children Safe in Education (KCSIE) 2023 as;

(for the purpose of this policy the term child or children will also relate to vulnerable adults)

- protecting children from maltreatment;
- preventing impairment of child'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.

For the purposes of this policy, the term 'safeguarding' refers to everything that the college does to keep student/interns safe and promote their welfare, including (but not limited to):

- Supporting student/interns' health, safety and well-being, including their mental health.
- Meeting the needs of student/interns with special educational

needs and/or disabilities.

- The use of reasonable force.
- Meeting the needs of student/interns with medical conditions.
- Providing first aid.
- Educational visits.
- Intimate care and emotional wellbeing.
- Online safety and associated issues.
- Appropriate arrangements to ensure college security, taking into account the local context.
- Keeping student/interns safe from risks, harm and exploitation.
- Child protection.

Child protection is part of safeguarding and refers to activities undertaken to prevent student/interns suffering, or being likely to suffer, significant harm. This includes vulnerable adults.

Abuse is a form of maltreatment of a child or vulnerable adult, and may involve inflicting harm or failing to act to prevent harm. It can be perpetrated by an adult or adults known or unknown to a child/vulnerable adult, or a child known or unknown to the child/vulnerable adult. It can happen in person or online. Where abuse is perpetrated by another child, it is known as or 'child on child' abuse (please see Appendix B for further explanation of types of abuse).

Neglect is a form of abuse and is the persistent failure to meet a child/vulnerable adult's basic physical and/or psychological needs, likely to result in the serious impairment of the child/vulnerable adult's health or development².

Child on child abuse refers to the abuse of a child or children perpetrated by another child or children. 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);

² See Appendix C for more information about abuse and neglect.

- 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-nude images and or videos (also known as sexting or youth produced sexual imagery);
- Upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm; and
- Initiation / hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).³

Children includes everyone under the age of 18.

Safeguarding Partners are the 3 identified bodies in Keeping Children Safe in Education (and defined in the Children Act 2004, as amended by chapter 2 of the Children and Social Work Act 2017). They will make arrangements to work together to safeguard and promote the welfare of local children, including identifying and responding to their needs:

- The local authority (LA)
- Integrated care boards (previously known as clinical commissioning groups) for an area within the LA
- The chief officer of police for a police area in the LA area

Within this policy:

- **'Parent'** refers to birth parents and other adults in a parenting role for example adoptive parents, step parents and foster carers.
- **'Staff'** or **'members of staff'** refers to all teaching, non-teaching, support, supply, peripatetic, contract staff, governors, volunteers and **trustees** working in or on behalf of the college.
- Keeping Children Safe in Education (2023) may be abbreviated to

³ Keeping Children Safe in Education (2021)

'KCSIE'.

Victim is a widely understood and recognised term, but we understand that not everyone who has been subjected to abuse considers themselves a victim, or would want to be described that way. When managing an incident, we will be prepared to use any term that the child involved feels most comfortable with.

Alleged perpetrator(s) and **perpetrator(s)** are widely used and recognised terms. However, we will think carefully about what terminology we use (especially in front of children) as, in some cases, abusive behaviour can be harmful to the perpetrator too. We will decide what's appropriate and which terms to use on a case-by-case basis.

5. Legislation and statutory guidance

Creating Tomorrow Trust adheres to all relevant safeguarding legislation, statutory guidance and guidance from the local Safeguarding Children and Adult Boards. This includes:

This policy is based on the Department for Education's (DfE's) statutory guidance [Keeping Children Safe in Education \(2023\)](#) and [Working Together to Safeguard Children \(2018\)](#), and the [Governance Handbook](#). We comply with this guidance and the arrangements agreed and published by our 3 local safeguarding partners (see section 4).

This policy is also based on the following legislation:

- Part 3 of the schedule to the [Education \(Independent School Standards\) Regulations 2014](#), which places a duty on academies and independent schools to safeguard and promote the welfare of student/interns at the school
- Part 1 of the schedule to the [Non-Maintained Special Schools \(England\) Regulations 2015](#), which places a duty on non-maintained special schools to safeguard and promote the welfare of student/interns at the school
- [The Children Act 1989](#) (and [2004 amendment](#)), which provides a framework for the care and protection of children
- Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the [Serious Crime Act 2015](#), which places a statutory duty on tutors to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18
- [Statutory guidance on FGM](#), which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM
- [The Rehabilitation of Offenders Act 1974](#), which outlines when people with criminal convictions can work with children
- Schedule 4 of the [Safeguarding Vulnerable Groups Act 2006](#), which defines what 'regulated activity' is in relation to children
- [Statutory guidance on the Prevent duty](#), which explains colleges' duties under the Counter-Terrorism and Security Act 2015 with

respect to protecting people from the risk of radicalisation and extremism

- [The Human Rights Act 1998](#), which explains that being subjected to harassment, violence and/or abuse, including that of a sexual nature, may breach any or all of the rights which apply to individuals under the [European Convention on Human Rights](#) (ECHR)
- [The Equality Act 2010](#), which makes it unlawful to discriminate against people regarding particular protected characteristics (including disability, sex, sexual orientation, gender reassignment and race). This means our governors and Principal should carefully consider how they are supporting their student/interns with regard to these characteristics. The Act allows our college to take positive action to deal with particular disadvantages affecting student/interns (where we can show it's proportionate). This includes making reasonable adjustments for disabled student/interns. For example, it could include taking positive action to support girls where there's evidence that they're being disproportionately subjected to sexual violence or harassment

Guidance from the Northamptonshire Safeguarding Children Partnership (NSCP) can be found here: <http://www.northamptonshirescb.org.uk/>

Guidance from the Northamptonshire Safeguarding Adults Board can be found here:
<https://www.northamptonshiresab.org.uk/Pages/default.aspx>

The college also has regard relevant to non-statutory guidance relating to safeguarding, including:

- What to do if you are worried a child is being abused (2015)
- Guidance for safer working practice for those working with children and young people in education settings (2023)
- Sexual violence and sexual harassment between children in schools and colleges (2021)

This policy also complies with our funding agreement.

6. Equality Statement

We are committed to anti-discriminatory practice and recognise student/interns' diverse circumstances. Some student/interns are at an increased risk of abuse, both offline and online, and additional barriers can exist for some student/interns with respect to recognising or disclosing it. We ensure that all student/interns have the same protection, regardless of any barriers they may face.

All of our student/interns have special educational need and disabilities (SEND), and we are fully aware that our student/interns, due to their additional vulnerabilities are particularly at risk of abuse. Please see Section 12 for further details about how we work to support student/interns with special educational needs and disabilities (SEND).

We give special consideration to student/interns who:

- Are young carers.
- May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
- Have English as an additional language.
- Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence.
- Are at risk of FGM, sexual exploitation, forced marriage, or radicalisation.
- Are asylum seekers.
- Are at risk due to either their own or a family member's mental health needs.
- Are looked after or previously looked after (see section 14)
- Are missing or absent from education for prolonged periods and/or repeat occasions.
- Whose parent/carer has expressed an intention to remove them from college to be home educated.

7. Confidentiality and Information Sharing

Information sharing is vital in identifying and tackling all forms of abuse and neglect, and in promoting student/interns' welfare, including their educational outcomes. Schools and colleges have clear powers to share, hold and use information for these purposes. The General Data Protection Regulation (GDPR) does not prevent, or limit, the sharing of information for the purposes of keeping student/interns safe. Lawful and secure information

sharing between colleges, Children or adult social care, and other local agencies, is essential for keeping student/interns safe and ensuring they get the support they need.

The college adheres to the Data Protection Act (2018) and the General Data Protection Regulation (2018). Please see the Data Protection Policy and Privacy Notice for more information.

7.1 Sharing information with parents

Creating Tomorrow College will ensure the Vulnerable Adult, Child Protection & Safeguarding Policy is available publicly via the college website and paper copies can be made available on request to the college.

Where appropriate, we will discuss any concerns about a child/vulnerable adult with the young person's parents/carers. The Designated Safeguarding Lead (DSL) will normally do this in the event of a concern, suspicion or disclosure. Other staff will only talk to parents/carers about any such concerns following consultation with the DSL.

If we believe that notifying the parents/carers would increase the risk to the child/vulnerable adult, we will discuss this with the local authority children or adult social care team before doing so (see Section 6.2 for more details). In the case of allegations of abuse made against other student/interns, we will normally notify the parents/carers of all the children/vulnerable adults involved.

7.2 Consent

The Data Protection Act 2018 introduced 'safeguarding' as a reason to be able to process sensitive, personal information, even without consent (DPA, Part 2, 18; Schedule 8, 4). All relevant information can be shared without consent if to gain consent would place a child/vulnerable adult at risk. Fears about sharing information **must not be allowed** to stand in the way of promoting the welfare and protecting the safety of student/interns. All professionals responsible for student/interns should not assume that someone else will pass on information that they think may be critical to keeping a child/vulnerable adult safe.

As with all data sharing, appropriate organisational and technical safeguards are in place and will be adhered to when processing safeguarding and child protection information.

When considering whether, or not, to share safeguarding information (especially with other agencies), Creating Tomorrow College will record who they are sharing that information with and for what reason. If we have taken a decision not to seek consent from the data subject and/or parent/carer that should also be recorded within the safeguarding file.

All staff in college will be made aware of their duties in relation to Data Protection and safeguarding, particularly in respect of confidentiality. This includes the following:

- Staff should never promise a child/vulnerable adult that they will not tell anyone about an allegation, as this may not be in the child/vulnerable adult's best interests.
- Staff who receive information about student/interns and their families in the course of their work should share that information only within appropriate professional contexts.
- Timely information sharing is essential to effective safeguarding.
- Information must only be shared on a 'need-to-know' basis, but consent is not required to share information if a child/vulnerable adult is suffering, or at risk of, serious harm.⁴
- If a victim asks the college not to tell anyone about the sexual violence or sexual harassment:
 - There's no definitive answer, because even if a victim doesn't consent to sharing information, staff may still lawfully share it if there's another legal basis under the UK GDPR that applies
 - The DSL will have to balance the victim's wishes against their duty to protect the victim and other student/interns
 - The DSL should consider that:
 - Parents or carers should normally be informed (unless this would put the victim at greater risk)
 - The basic safeguarding principle is: if a child/vulnerable adult is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to local authority student/interns's social care
 - Rape, assault by penetration and sexual assault are crimes. Where a report of rape, assault by penetration or sexual assault is made, this should be referred to the police. While the age of criminal responsibility is 10, if the

⁴ See Working Together to Safeguard Children (2018), pages 18-22 for more information.

alleged perpetrator is under 10, the starting principle of referring to the police remains

- Regarding anonymity, all staff will:
 - Be aware of anonymity, witness support and the criminal process in general where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system
 - Do all they reasonably can to protect the anonymity of any student/interns involved in any report of sexual violence or sexual harassment, for example, carefully considering which staff should know about the report, and any support for student/interns involved
 - Consider the potential impact of social media in facilitating the spreading of rumours and exposing victims' identities
- The government's [information sharing advice for safeguarding practitioners](#) includes 7 'golden rules' for sharing information, and will support staff who have to make decisions about sharing information
- If staff are in any doubt about sharing information, they should speak to the DSL (or deputy)
- Confidentiality is also addressed in this policy with respect to record-keeping in section 15, and allegations of abuse against staff in section 18

8. Roles and responsibilities

Safeguarding and child protection is everyone's responsibility. This policy applies to all staff, volunteers and governors in the college and is consistent with the procedures of the 3 safeguarding partners. Our policy and procedures also apply to extended college and off-site activities.

The college plays a crucial role in preventative education. This is in the context of a whole-college approach to preparing student/interns for life in modern Britain, and a culture of zero tolerance of sexism, misogyny/misandry, homophobia, biphobia, transphobia and sexual violence/harassment. This will be underpinned by our:

- Student Conduct policy
- Pastoral support system
- Planned tutorial programme which is inclusive and delivered regularly, tackling issues such as:

- Healthy and respectful relationships
- Boundaries and consent
- Stereotyping, prejudice and equality
- Body confidence and self-esteem
- How to recognise an abusive relationship (including coercive and controlling behaviour)
- The concepts of, and laws relating to, sexual consent, sexual exploitation, abuse, grooming, coercion, harassment, rape, domestic abuse, so-called honour-based violence such as forced marriage and FGM and how to access support.

What constitutes sexual harassment and sexual violence and why they're always unacceptable

8.1 Governing bodies and Trustees

Governing bodies and Trustees have a strategic leadership responsibility for the college's safeguarding arrangements. The governing body will appoint a senior board level (or equivalent) Governor Safeguarding Lead to monitor the effectiveness of this policy in conjunction with the full governing board. This is always a different person from the DSL. The Governor Safeguarding Lead is Andrew Green. The Trustees will appoint a Safeguarding Trustee (at Creating Tomorrow this is Janet Duggan, JDuggan@creatingtomorrowtrust.co.uk)

Governors/Trustees will ensure that there are mechanisms in place to assist staff in understanding and discharging their statutory safeguarding roles and responsibilities. Governors will ensure that the college is working with local safeguarding partners and that the college contributes to multi-agency working, adhering to Working Together to Safeguard Children (2018). All governors will read KCSIE (2023) and a record will be kept of this.

Part 2 of KCSIE (2023) sets out the responsibilities of governing bodies and our Trustees and governors will adhere to this guidance at all times. As part of these responsibilities the governors will;

- ensure that they comply with their duties under statutory guidance and legislation; including its obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty), and our college's local multi-agency safeguarding arrangements;
- work to facilitate a whole college approach to safeguarding, by ensuring that safeguarding and child protection underpin all relevant aspects of policy and process;
- ensure that policies, procedure and training at the college are effective and comply with the law at all times and that they allow

- concerns to be responded to in a timely manner;
- ensure that safeguarding training for staff, including online safety training, is integrated, aligned and considered as part of the whole college or college safeguarding approach and wider staff training and curriculum planning;
 - ensure that the college takes into account local criteria for action and protocol for assessment and supply information as requested by the three safeguarding partners;
 - ensure that the college has an effective child protection policy, which is published on the college website and/or available by other means and review this annually;
 - ensure that the college has systems in place to allow student/interns to raise concerns, which are well-promoted, well-understood and easily accessible;
 - ensure that the college takes safeguarding concerns seriously and takes the wishes and feelings of student/interns into account;
 - ensure that there are systems in place for young people to safely express their views and give feedback on safeguarding practice;
 - ensure that the college has a suitable behaviour policy for student/interns and a staff behaviour policy or Code of Conduct;
 - ensure that all staff undergo safeguarding and child protection training on induction;
 - consider a whole-college approach to online safety, including the use of mobile technology in college;
 - ensure that there are clear systems and processes in place for identifying when student/interns may be experiencing mental health problems;
 - ensure that student/interns are taught about safeguarding, including online safety. See section 12 of this policy for further information;
 - ensure that an appropriate safeguarding response for student/interns who go missing from education is in place;
 - appoint an appropriate member of staff from the senior leadership team to the role of Designated Safeguarding Lead and ensure that the DSL has the appropriate status and authority to carry out their job, including additional time, funding, training, resources and support
 - ensure that appropriate filters and monitoring systems are in place to keep student/interns safe online and *that governing bodies and proprietors should regularly review the effectiveness of college filters and monitoring systems (against DfE filtering and monitoring standards). They should ensure that the leadership team and relevant staff are:*
 - aware of and understand the systems in place

- *manage them effectively*
- *know how to escalate concerns when identified*
- *Ensure regular training includes online safety.*
- ensure that there are appropriate procedures in place to manage safeguarding concerns, or allegations against staff including allegations that do not meet the harm threshold (low-level concerns) about staff members (including supply staff, volunteers and contractors). Appendix C of this policy covers this procedure.
- respond to allegations of abuse against the Principal or the Trust Leadership Team. The Chair of Trustees will act as the ‘case manager’ in the event that an allegation of abuse is made against the Principal or the Trust Leadership Team, where appropriate (see section Appendix D).

8.2 The Principal

The Principal is responsible for the implementation of this policy. The Principal will:

- ensure that this policy is reviewed annually and ratified by the governing body;
- ensure that this policy and associated procedures are adhered to by all staff and take action as necessary if not;
- ensure that staff (including temporary staff) and volunteers are informed of our systems that support safeguarding, including this policy, as part of their induction.
- ensure that all staff are made aware of the named governor for safeguarding and the Designated Safeguarding Lead;
- ensure that the role of ‘Designated Safeguarding Lead’ is explicit in the role-holder’s job description, that they have appropriate time, funding, training and resources and that there is always adequate cover if the DSL is absent;
- decide whether to have one or more deputy safeguarding leads and ensure they are trained to the same standard as the Designated Safeguarding Lead;
- organise appropriate cover for the role of Designated Safeguarding Lead for any out of hours/out of term activities;
- appoint a ‘Designated Teacher for Looked After and Previously Looked After Children’ to promote the educational achievement of student/interns looked after and previously looked after, at Creating Tomorrow College this is Carole Wilson-Frizzell;
- appoint a lead for online safety – at college this is Carole Wilson-Frizzell (usually the DSL – see KCSIE 2023 Paragraph 103)
- Ensure online safety training is included in staff safeguarding and

- child protection training
- ensure that all recruitment follows the safer recruitment guidance (see Part 3 of KCSIE) and a single, central record is maintained with details of all members of staff who are in contact with student/interns;
 - respond to allegations of abuse against all other members of staff and act as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate (see section 18 in this policy);
 - make decisions regarding all low-level concerns,
 - refer cases where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service as required;
 - ensure that college works with social care, the police, health services and other services to; promote the welfare of student/interns; provide a co-ordinated offer of early help when need is identified; contribute to inter-agency plans for student/interns subject to children protection plans and to protect children from harm;
 - safeguard student/interns' wellbeing and maintain public trust in the teaching profession as part of their professional duties (Teaching Standards, 2012);
 - ensure that children or adult social care (from the host local authority or placing authority) have access to the college to conduct, or to consider whether to conduct a section 47 or section 17 assessment, as per Keeping Children Safe in Education (September 2023);

8.3 The Designated Safeguarding Lead (DSL)

The full responsibilities of the DSL are set out in Annex C, KCSIE (2023).

The DSL is a member of the leadership team. Our Lead DSL is Carole Wilson-Frizell The DSL takes lead responsibility for child protection and wider safeguarding.

During term time, the DSL will be available during college hours for staff to discuss any safeguarding concerns.

Designated Safeguarding Leads at Creating Tomorrow College

DO YOU HAVE A SAFEGUARDING CONCERN?

If you are worried about a student or member of staff, you must share your concern with a designated safeguarding lead, without delay.

Please include:

Date Time Who Concern

WHO SHOULD I CONTACT?

				
CAROLE WILSON-FRIZZELL Designated Safeguarding Lead	SARAH GRIST Deputy Safeguarding Lead	ASIA MALINOWSKA Deputy Safeguarding Lead	GARETH IVETT Deputy Safeguarding Lead	KEVIN LATHAM Deputy Safeguarding Lead
cwilson-frizzell@creatingtomorrowcollege.co.uk	sgrist@creatingtomorrowcollege.co.uk	jmalinowska@creatingtomorrowcollege.co.uk	givett@creatingtomorrowcollege.co.uk	klatham@creatingtomorrowtrust.co.uk

Creating Tomorrow College
Celebrating Differences. As Equals.

POSTER ISSUE DATE
September 2023

All DSL's have a college email and work phone as shown in the table below and are contactable both in and outside of college hours.

Name	Contact Details
Carole Wilson-Frizzell Director of College (performance & Standards), Lead Designated Safeguarding Lead	cwilsonfrizzell@creatingtomorrowcollege.co.uk 07485 303128
Gareth Ivett Principal, Deputy Designated Safeguarding Lead	givett@creatingtomorrowcollege.co.uk 07990 012330
Asia Malinowska Operations Manager, Deputy Designated Safeguarding Lead	amalinowska@creatingtomorrowcollege.co.uk 07485314289
Sarah Grist Campus Leader, Deputy Designated Safeguarding Lead	sgrist@creatingtomorrowcollege.co.uk 07483 037970
Kevin Latham Deputy DSL CEO	KLatham@creatingtomorrowtrust.co.uk 01536 856467 / 07825915272

When the DSL is absent from college or off site attending meetings, the deputies will act as cover. There will always be at least one DSL / Deputy on site at all times.

During out-of-hours/out-of-term activities there will be a DSL rota made available to all staff so that staff can access a DSL at any time.

Whilst the activities of the designated safeguarding lead can be delegated to appropriately trained deputies, the ultimate **lead responsibility** for vulnerable adult/child protection, as set out above, remains with the designated safeguarding lead; this **lead responsibility** should not be delegated.

The Designated Safeguarding Lead will;

- Act as a source of support and expertise on matters relating to safeguarding and child/vulnerable adult protection to ensure that other members of staff can carry out their safeguarding duty;
- Advise on the response to safeguarding concerns;
- Liaise with the Local Authority and work with other agencies in line with 'Working Together to Safeguard Children (2018);
- Identify if student/interns may benefit from early help;
- Refer suspected cases, as appropriate, to the relevant body (local

authority children or adult social care, Channel programme, Disclosure and Barring Service, and/or police), and support staff who make such referrals directly

- Make referrals to the Channel programme where there is a radicalisation concern and/or support staff that make a referral to Channel;
- Support the college with regards to their responsibilities under the Prevent duty and provide advice and support on protecting student/interns from radicalisation;
- Refer cases to the police where a crime may have been committed;
- Be available during college hours for staff to discuss any safeguarding concerns. In the event that they are not available, a deputy will be made available;
- Undertake training to equip them with the skills to carry out the role and update this every two years;
- Ensure all staff that work directly with student/interns have read and understood Part 1 and Annex B of Keeping Children Safe in Education (September 2023);
- Ensure all staff that do not work directly with student/interns have read either Part 1 or Annex A (as appropriate) of Keeping Children Safe in Education (2023);
- Update their knowledge and skills regularly and keep up with any developments relevant to their role;
- Provide staff in college with the knowledge, skills and support required to safeguard student/interns;
- Take responsibility for the accurate and timely recording of safeguarding and child protection concerns and take overall responsibility for safeguarding and child protection files;
- Take responsibility for the transfer of safeguarding files when a child/vulnerable adult leaves the college;
- Attend or ensure an appropriate representative attends multi-agency safeguarding or child protection meetings;
- Work closely with other relevant education professionals (e.g. SENCOs, Virtual School Head) to ensure student/interns with additional vulnerabilities are safeguarded;
- Unless delegated to member of the leadership team, take responsibility for online safety and understanding the filtering and monitoring systems and processes in place;
- Help to promote educational outcomes of student/interns who have experienced or are experiencing safeguarding or child protection issues by sharing relevant information with tutors and the college leadership team; The DSL(s) will take lead responsibility for promoting educational outcomes by knowing the welfare, safeguarding and

child protection issues that student/interns in need are experiencing, or have experienced, and identifying the impact that these issues might be having on student/interns' attendance, engagement and achievement. This will include understanding their academic progress and attainment and maintaining a culture of high aspirations for this cohort and supporting teaching staff to provide additional academic support or reasonable adjustments to help student/interns who have or have had a social worker reach their potential.

- We recognise that a child/vulnerable adult's experiences of adversity and trauma can leave them vulnerable to further harm, as well as educationally disadvantaged in facing barriers to attendance, learning, behaviour and mental health. The DSL will use the information that they hold about student/interns with a social worker to make decisions in the best interests of the child/vulnerable adult's safety, welfare and help promote educational outcomes. The DSL will ensure that staff, know who these student/interns 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 student/interns in this group might face and the additional academic support and adjustments that they could make to best support these student/interns.
- Promote a 'culture of safeguarding', in which every member of the college community acts in the best interests of the child/vulnerable adult;
- Regularly meet with the safeguarding link governor and/or Chair of Governors to review safeguarding at the college; and
- Liaise with the Principal regarding safeguarding cases and issues.
- Have a good understanding of harmful sexual behaviour
- Know what local specialist support is available to support all student/interns involved (including victims and alleged perpetrators) in sexual violence and sexual harassment and be confident as to how to access this support.
- Be aware that student/interns must have an 'appropriate adult' to support and help them in the case of a police investigation or search.

8.4 All staff

Staff play a particularly important role because they are in a position to identify concerns in order to provide help for student/interns. All staff;

- have a responsibility to provide a safe environment, where student/interns can learn;

- will be trained so that they know what to do if a child/vulnerable adult tells them that he/she is being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals;
- will be able to identify indicators of abuse and neglect;
- will be made aware of systems in the college that support safeguarding and child protection;
- will be made aware of safeguarding issues that put student/interns at risk of harm and behaviours associated with these risks;
- should ensure that they know what to do if a child /vulnerable adult makes a disclosure of abuse and never promise confidentiality when a child makes a disclosure;
- will be made aware of and should be clear on the school's or college's policy and procedures with regards to peer-on-peer abuse and the important role they have to play in preventing it and responding where they believe a child/vulnerable adult may be at risk from it;
- will be made aware of the early help process and understand their role in it;
- should be prepared to identify student/interns who may benefit from early help and will discuss early help requirements with the safeguarding lead in the first instance;
- may be required to support social workers and other agencies following a referral;
- will be made aware of the process for making referrals to children or adult social care (through the MASH), understand statutory assessments and the role that they may be expected to play in such assessments;
- should be prepared to make referrals to the MASH if they have concerns about a child/vulnerable adult's welfare and understand the role that they may be expected to play in such assessments;
- will receive regularly updated safeguarding and child protection training to cover all of the above, as well as online safety;
- will receive safeguarding updates throughout the year as part of continuous professional development;
- will be encouraged to contribute to the development of safeguarding policy and practice;
- should always seek advice from the Designated Safeguarding Lead if they are unsure; and
- all tutors should safeguard student/interns wellbeing and maintain public trust in the teaching profession as part of their professional duties (Teaching Standards, 2012).
- Reinforce the importance of online safety when communicating with parents. This includes making parents aware of what we ask children

to do online (e.g. sites they need to visit or who they'll be interacting with online)

- Provide a safe space for student/interns who are LGBTQ+ to speak out and share their concerns.

All staff will be aware of:-

- The fact that student/interns can be at risk of harm inside and outside of their home, at college and online
- The fact that student/interns who are (or who are perceived to be) lesbian, gay, bi or trans (LGBT) can be targeted by other student/interns
- What to look for to identify student/interns who need help or protection

All staff will be made aware of our systems and documents that support safeguarding, including this policy, the staff code of conduct, the role and identity of the designated safeguarding lead (DSL) and any deputies, the behaviour policy and the safeguarding response to student/interns who go missing from education.

All staff that are employed to work within Creating Tomorrow Trust, Governors and Trustees will be provided with a copy of, and must read, Part 1 and Annex B of Keeping Children Safe in Education (September 2023) annually and will receive annually updated training on their safeguarding roles and responsibilities.

All staff will sign a declaration at the beginning of each academic year to say that they have reviewed the guidance.

Although there are extensive mechanisms in place to support staff understanding in relation to safeguarding and child protection, there is an expectation that if staff are unclear on any aspects of college safeguarding policy or practice, they speak to the Designated Safeguarding Lead without delay, so that additional training can be put in place.

9. Recognising Abuse: Training

The college is committed to continuous professional development and all staff undergo rigorous and ongoing safeguarding training. We strive to ensure that staff fully understand their safeguarding responsibilities, that training promotes a culture of safeguarding and equips staff with the skills to identify any signs of abuse, neglect or harm.

9.1 All staff

- All staff members will undertake safeguarding and child protection training at induction (including whistle-blowing procedures) to ensure they understand the college's safeguarding systems, their responsibilities and can identify signs of possible abuse or neglect. This training will be regularly updated and will be in line with advice from the three safeguarding partners.
- All staff training should include online safety, including an understanding of the expectations, roles and responsibilities in relation to filtering and monitoring
- All staff will have training on the government's anti-radicalisation strategy Prevent, to enable them to identify student/interns at risk of being drawn into terrorism and to challenge extremist ideas.
- Staff will also receive regular safeguarding and child protection updates (for example, through emails, e-bulletins and staff meetings) as required, but at least annually.
- Contractors who are provided through a private finance initiative (PFI) or similar contract will also receive safeguarding training.
- Volunteers will receive appropriate training, as applicable.

Tutors will receive training to ensure that they can manage behaviour effectively to ensure a good and safe educational environment and they should have a clear understanding of the needs of all student/interns.

9.2 The DSL and Deputy DSLs

- The DSL and Deputy DSLs will undertake child protection and safeguarding training at least every 2 years.
- In addition, they will update their knowledge and skills at regular intervals and at least annually (for example, through e-bulletins, meeting other DSLs, or taking time to read and digest safeguarding developments).
- They will also undertake Prevent awareness training and online safety training.

9.3 Governors and Trustees

- All governors receive safeguarding training (including online safety) at induction, which is regularly updated, to make sure they have the knowledge and information needed to perform their functions and understand their responsibilities including providing strategic challenge and ensuring there is a whole college approach to safeguarding.
- As the Chair of Trustees may be required to act as the 'case manager' in the event that an allegation of abuse is made against the Principal or a member of the Trust Leadership Team, they should receive training in managing allegations for this purpose.

9.4 Recruitment – interview panels

At least one person conducting any interview for a post at the college will have undertaken safer recruitment training. This will cover, as a minimum, the contents of the Department for Education's statutory guidance, KCSIE (2023), and will be in line with local safeguarding procedures.

9.5 Supervision

- All staff who have contact with student/interns and families will have supervision which will provide them with support, coaching and training, promote the interests of student/interns and allow for confidential discussions of sensitive issues.
- Staff at Creating Tomorrow Trust will be offered supervision depending upon their role and needs. Some staff will be offered regular individual supervision to manage their workload, whereas others may be offered supervision as a group or when particular issues may arise.

9.6 Specific safeguarding issues

Staff will also receive specific training on the following issues and action will be taken if the college suspects that a child/vulnerable adult is at risk of or is the victim of;

- physical abuse;
- sexual abuse;
- child sexual exploitation;
- emotional abuse;
- neglect;
- child criminal exploitation (including involvement in county lines);
- domestic abuse;
- fabricated or induced illness;

- faith-based abuse;
- female genital mutilation;
- forced marriage;
- gangs or youth violence;
- gender-based violence;
- hate;
- online safety;
- child on child abuse;
- radicalisation;
- relationship abuse;
- serious violence;
- sexual violence or sexual harassment (including peer on peer abuse);
- sexting or sharing of youth produced sexual imagery;
- so-called 'honour-based' abuse;
- trafficking and modern slavery.

All staff will be made aware that safeguarding incidents and/or behaviours can be associated with factors outside the college and/or can occur between student/interns outside of these environments. All staff will be expected to consider whether student/interns are at risk of abuse or exploitation in situations outside their families (extra-familial harm).

Staff will also be made aware of the additional safeguarding vulnerabilities of;

- student/interns in the court system;
- student/interns absent from education;
- student/interns with family members in prison;
- student/interns who are homeless;
- child who have or have had a social worker;
- student/interns who are young carers;
- student/interns looked after or previously looked after; and
- student/interns with mental health problems.

10. Recognising and responding to abuse: How to take action

10.1 Reporting systems for our student/interns

Where there is a safeguarding concern, we will take the child/vulnerable adult's wishes and feelings into account when determining what action to take and what services to provide.

We recognise the importance of ensuring student/interns feel safe and comfortable to come forward and report any concerns and/or allegations.

To achieve this, we will:

- Put systems in place for student/interns to confidently report abuse.
- Ensure our reporting systems are well promoted, easily understood and easily accessible for student/interns.
- Make it clear to student/interns that their concerns will be taken seriously, and that they can safely express their views and give feedback

10.2 Concerns about a child/vulnerable adult's welfare

If a member of staff, parent or member of the public is concerned about a student/intern's welfare, they should report it to the DSL as soon as possible. On occasions when the DSL is not available, it should be reported to the deputy safeguarding lead/s without delay. If in exceptional circumstances, the DSL (or deputy) is not available, this should not delay appropriate action being taken. Staff should consider speaking to a member of the senior leadership team and/or take advice from local children or adult social care.

Although any member of staff can make a referral to children or adult social care, where possible there should be a conversation with the DSL. All staff must follow the procedures set out below in the event of a safeguarding issue.

All staff will be alert to indicators of abuse (including peer on peer abuse) and will report any of the following to the Designated Safeguarding Lead immediately;

- any concern or suspicion that a child/vulnerable adult has sustained an injury outside what is reasonably attributable to normal play;
- any concerning behaviours exhibited by student/interns that may indicate that they have been harmed or are at risk of harm, including unusual changes in mood or behaviour, concerning use of language and/or concerning drawings or stories;
- any significant changes in attendance or punctuality;
- any significant changes in a child/vulnerable adult's presentation;
- any indicators that a child/vulnerable adult may be experiencing peer on peer abuse;

- any concerns relating to people who may pose a risk of harm to a child/vulnerable adult; and/or
- any disclosures of abuse that student/interns have made.

More information about our approach to child on child abuse (including sexual violence and sexual harassment) can be found at Appendix A.

The following procedures are in line with statutory guidance (see Section 4) and the Northamptonshire Safeguarding Children Partnership's Threshold Guidance (2018)⁵. Referral procedures can be found in section 9.5.

10.2 If a child/vulnerable adult discloses that they are suffering or at risk of suffering abuse

If a child/vulnerable adult discloses that he or she has been abused in some way, the member of staff/volunteer will:

- listen to what is being said without displaying shock or disbelief;
- accept what is being said;
- allow the child/vulnerable adult to talk freely;
- reassure the child/vulnerable adult, but do not make promises which it might not be possible to keep;
- never promise a child/vulnerable adult that they will not tell anyone - as this may ultimately not be in the best interests of the child/vulnerable adult;
- reassure them that what has happened is not their fault;
- stress that it was the right thing to tell;
- listen, only asking questions when necessary to clarify;
- not criticise the alleged perpetrator;
- explain what has to be done next and who has to be told;
- make a written record (see Record Keeping) using My Concern, or if not able to access a computer make a written note and transfer to My Concern as soon as possible; and
- pass the information to the Designated Safeguarding Lead without delay Alternatively, if appropriate, make a referral to children or adult social care and/or the police directly (see 10.2), and tell the DSL as soon as possible that you have done so.

All staff will 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

⁵ <https://www.nctrust.co.uk/help-and-protection-for-children/Documents/NSCB%20Thresholds%20Guidance.pdf>

violence or sexual harassment, nor should a victim ever be made to feel ashamed for making a report.

Bear in mind that some student/interns may:

- Not feel ready or know how to tell someone that they are being abused, exploited or neglected.
- Not recognise their experiences as harmful
- Feel embarrassed, humiliated or threatened. This could be due to their vulnerability, disability, sexual orientation and/or language barriers.

None of this should stop you from having a 'professional curiosity' and speaking to the DSL if you have concerns about a child/vulnerable adult.

10.3 If a child/vulnerable adult is suffering or likely to suffer harm, or in immediate danger

If you think that a child/vulnerable adult is suffering or at risk of suffering significant harm, you must report this to the designated safeguarding lead immediately. On occasions when the designated safeguarding lead is not available, it should be reported to the deputy safeguarding lead without delay or a senior member of staff.

Where possible, there should be a conversation with the Designated Safeguarding Lead but a referral must be made if a child may be suffering or at risk of suffering harm. **Anyone can make a referral to children or adult social care.** If anyone other than the DSL makes a referral to children or adult social care or to the police, they should inform the DSL as soon as possible.

10.4 If you have concerns about a child/vulnerable adult (as opposed to believing a child/vulnerable adult is suffering or likely to suffer from harm, or is in immediate danger)

Figure 1 on page 20 illustrates the procedure to follow if you have any concerns about a child/vulnerable adult's welfare. Where possible, speak to the DSL first to agree a course of action (see 9.2).

The DSL will decide on the most appropriate course of action and whether the concerns should be referred to children or adult social care, using the [Northamptonshire Thresholds Guidance](#). If it is decided to make a referral to children or adult social care the parent will be informed, unless to do so

would place the child at further risk or undermine the collection of evidence. See Section 6.1 for more details.

All concerns, discussions and decisions will be recorded in writing.

The DSL will provide guidance on the appropriate action. Options will include:

- managing any support for the child/vulnerable adult internally via the college's own pastoral support processes;
- seeking advice from the local early help co-ordinator/s;
- an Early Help Assessment; or
- a referral for statutory services where the child is or might be in need or suffering or likely to suffer significant harm.

10.5 Early help

All staff should be prepared to identify student/interns who may benefit from early help. Early help means providing support as soon as a problem emerges at any point in a child/vulnerable adult's life, from the foundation years through to the teenage years.⁶ If early help is appropriate, the DSL will generally lead on liaising with other agencies and setting up an inter-agency assessment as appropriate. Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead practitioner. Any such cases should be kept under constant review and consideration given to a referral to children or adult social care for assessment for statutory services if the child/vulnerable adult's situation does not appear to be improving or is getting worse. Timelines of interventions will be monitored and reviewed.

All staff will be made aware of the early help process, and understand their role in identifying emerging problems, sharing information with other professionals to support early identification and assessment of a child/vulnerable adult's needs. It is important for student/interns to receive the right help at the right time to address risks and prevent issues escalating. This also includes staff monitoring the situation and feeding back to the Designated Safeguarding Lead any ongoing/escalating concerns so that consideration can be given to a referral to children or adult social care if the child/vulnerable adult's situation does not appear to be improving.

⁶ For more information about Early Help, please see: <https://www.nctrust.co.uk/help-and-protection-for-children/protecting-children-information-for-professionals/Pages/early-help.aspx>

We recognise that any child /vulnerable adult can be the victim of abuse and may benefit from early help. However, we will be particularly vigilant to potential need for early help if a child/vulnerable adult;

- 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/vulnerable adult, 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 so-called '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 college day.

10.5 Referrals

If it is appropriate to refer the case to local authority children or adult social care or the police, the DSL will make the referral or support you to do so. If you make a referral directly (see Section 9), you must tell the DSL as soon as possible. Children or adult social care assessments should consider where student/interns are being harmed in contexts outside the home, so the college will provide as much information as possible as part of the referral process. This will allow any assessment to consider all the available evidence and enable a contextual approach to address such harm.

The local authority will make a decision within 1 working day of a referral about what course of action to take and will let the person who made the referral know the outcome. The DSL or person who made the referral must

follow up with the local authority if this information is not made available, and ensure outcomes are properly recorded.

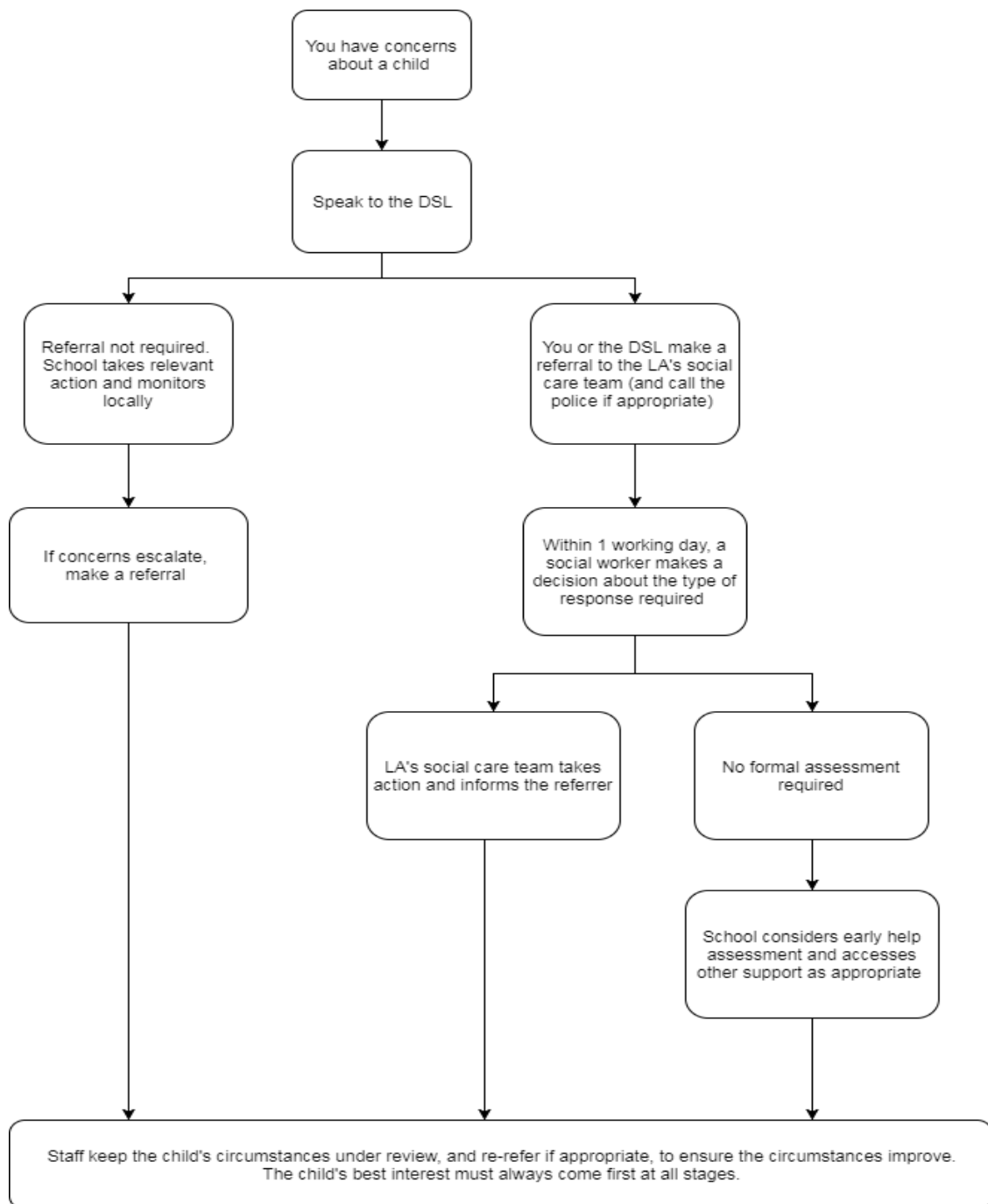
If the child/vulnerable adult's situation does not seem to be improving after the referral, the DSL or person who made the referral must follow local escalation procedures to ensure their concerns have been addressed and that the child/vulnerable adult's situation improves.⁷

The DSL should refer all cases of suspected abuse or neglect to the Multi Agency Safeguarding Hub (MASH), police (cases where a crime may have been committed) and to the Channel programme where there is a radicalisation concern. Safeguarding Referrals must be made in one of the following ways:

- By telephone contact to the Multi-Agency Safeguarding Hub (MASH):
 - North 0300 126 3000 / Out of hours: 01604 626938
 - West 0300 126 7000 / Out of hours: 01604 626938
- By using the online referral form found at:
 - Northamptonshire [MASH ONLINE REFERRAL](#)
- In an emergency outside office hours, contact children or adult social care out of hours team or the Police
- If a child is in immediate danger at any time, left alone or missing, you should contact the police directly and/or an ambulance using 999.

⁷ The NSCP Case and Conflict Resolution Protocol can be found here: <http://www.northamptonshirescb.org.uk/schools/case-conflict-resolution-protocol/>
https://northamptonshire-self.achieveservice.com/en/service/Make_a_children_s_referral_to_Northamptonshire_s_MASH
https://m.luton.gov.uk/Page/Show/Health_and_social_care/safeguarding/safeguarding_children/Pages/default.aspx

10.6 Figure 1: Reporting and responding to concerns flowchart



11. Specific safeguarding issues

For more information relating to specific safeguarding issues, please see Appendix B. For more information child on child abuse please see Appendix A.

11.1 Female Genital Mutilation (FGM)

Keeping Children Safe in Education explains that FGM comprises “all procedures involving partial or total removal of the external female genitalia, or other injury to the female genital organs”.

Any tutor who discovers (either through disclosure by the victim or visual evidence) that an act of FGM appears to have been carried out on a student under 18 must immediately report this to the police, personally. This is a statutory duty, and tutors will face disciplinary sanctions for failing to meet it. Unless they have good reason not to, they should also discuss the case with the DSL and involve children or adult social care as appropriate. Any other member of staff who discovers that an act of FGM appears to have been carried out on a student under 18 must speak to the DSL and follow our local safeguarding procedures.

The duty for tutors mentioned above does not apply in cases where a student/intern is *at risk* of FGM or FGM is suspected but is not known to have been carried out. Staff should not examine student/interns.

Any member of staff who suspects a student/intern is *at risk* of FGM or suspects that FGM has been carried out or discovers that a student/intern age 18 or over appears to have been a victim of FGM must speak to the DSL and follow our local safeguarding procedures.

11.2 Radicalisation and extremism

All colleges are subject to a duty under section 26 of the Counterterrorism and Security Act 2015 in the exercise of their functions to have “due regard” to the need to prevent people from being drawn into terrorism. In the event that concerns are raised relating to radicalisation and extremism, the DSL should be informed immediately.

If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or seek advice from local authority children or adult social care. Make a referral to local authority children or adult social care directly, if appropriate (see 'Referral' above). Inform the DSL or deputy as soon as practically possible after the referral.

Where there is a concern, the DSL will consider the level of risk and decide which agency to make a referral to. This could include [Channel](#), the government's programme for identifying and supporting individuals at risk of being drawn into terrorism, or the local authority children or adult social care team.

The DfE also has a dedicated telephone helpline, 020 7340 7264, which college staff and governors can call to raise concerns about extremism with respect to a student/intern. You can also email counter.extremism@education.gov.uk. Note that this is not for use in emergency situations.

In an emergency, call 999 or the confidential anti-terrorist hotline on 0800 789 321 if you:

- Think someone is in immediate danger
- Think someone may be planning to travel to join an extremist group
- See or hear something that may be terrorist-related

11.3 Children/vulnerable adult potentially at greater risk of harm

The college recognises that some student/interns need a social worker due to abuse, neglect or family circumstances and that abuse and trauma can leave student/interns vulnerable to further harm, as well as educational disadvantage.

The DSL will hold information relating to social workers working with student/interns at the college. This information will inform decisions about safeguarding and promoting welfare (including the provision of pastoral and/or academic support).

We will also take action to promote the educational outcomes of and to protect;

- Student/interns missing education;
- Student/interns missing from home or care.

There are other familial issues that can have a detrimental impact on student/interns. We work with other agencies in line with Keeping Children Safe in Education (2023) to support student/interns and families in the following circumstances:

- Student/interns facing the court procedures and/or student/interns in the court system.
- Student/interns with family members in prison.
- Student/interns who are homeless.
- Student/interns who need a social worker.

11.4 Mental health

Mental health problems can, in some cases, be an indicator that a child/vulnerable adult has suffered or is at risk of suffering abuse, neglect or exploitation.

Staff will be alert to behavioural signs that suggest a child/vulnerable adult may be experiencing a mental health problem or be at risk of developing one. Where student/interns have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these student/intern's experiences, can impact on their mental health, behaviour and education.

If staff have a mental health concern about a child/vulnerable adult we will respond to the concern, inform and discuss our concerns with parents/carers and seek ways to support the child/vulnerable adult in and out of college.

If you have a mental health concern about a child/vulnerable adult that is also a safeguarding concern, take immediate action by following the steps in Section 9.

If you have a mental health concern that is not also a safeguarding concern, speak to the DSL to agree a course of action.

Only appropriately trained professionals should attempt to make a diagnosis of a mental health concern. However, college will provide information and signposting services to student/interns and parents and assist with the

teaching of emotional health and wellbeing to student/interns in our curriculum.

Refer to the Department for Education guidance on [mental health and behaviour in schools](#)⁸ for more information.

11.5 Child on child abuse

The college takes all reports and concerns about peer on peer abuse, including child on child sexual violence and harassment, very seriously. This includes any reports or concerns that have occurred outside of the college premises, or online.

In order to ensure that our policy on child on child abuse is well-promoted, easily understood and accessible, we have included information about our approach to minimising and responding to child on child abuse as an appendix. Full details of how the college prevents, responds to and supports victims of child on child abuse can be found at Appendix A.

11.6 Online safety

Our E- Safety Policy is set out in a separate document and more information can be found in Section 12 of this policy. We ensure that we have effective mechanisms to identify, intervene in, and escalate any incident where appropriate. Online safety is included in our curriculum at all levels and information is also provided to parents/carers.

All staff are made aware of the college policy on Online Safety which sets our expectations relating to:

- creating a safer online environment – including training requirements, filters and monitoring;
- giving everyone the skills, knowledge and understanding to help student/interns and young people stay safe on-line;
- inspiring safe and responsible use and behaviour;
- safe use of mobile phones both within college and on college trips/outings;
- safe use of camera equipment, including camera phones; and
- what steps to take if you have concerns and where to go for further help.

⁸ <https://www.gov.uk/government/publications/mental-health-and-behaviour-in-schools--2>

Staff must read the *Online Safety Policy* in conjunction with our Code of Conduct in relation to personal online behaviour.

Student/intern mobile phones

As students are adults, therefore they are allowed to keep their mobile phones on them throughout the day. The college has multiple methods of supporting students/interns to keep themselves safe on mobile phones:

- 🔗 Education on the safe use of the internet, when accessing via mobile phone
- 🔗 Students are allowed to use their mobile phones during classtime if it is to support the planned learning and under the guidance of staff.

If a student/intern is found to be inappropriately or unsafely using mobile technology during college hours then the college will support by:

- 🔗 Providing further education on safe usage on a 1:1 basis
- 🔗 Involve supporters of the young person, if appropriate to enhance safe usage
- 🔗 Follow any process deemed necessary by a designated safeguarding lead to protect the young person and others
- 🔗 Involve third party agencies if deemed necessary.
- 🔗 For persistent offenders; confiscate the phone during college hours.
- 🔗 For persistent offenders; ban the student/intern bringing mobile technology to college and consider a breach of this ban as misconduct as outlined in the Student Conduct Policy

11.7 Sharing of nudes and semi-nudes (sexting)

Responsibilities when responding to an incident

If you are made aware of an incident involving the consensual or non-consensual sharing of nude or semi-nude images/videos (also known as 'sexting' or 'youth produced sexual imagery'), you must report it to the DSL immediately.

You must **not**:

- View, copy, print, share, store or save the imagery yourself, or ask a student/intern to share or download it (if you have already viewed the imagery by accident, you must report this to the DSL)
- Delete the imagery or ask the student/intern to delete it
- Ask the student/intern(s) who are involved in the incident to disclose information regarding the imagery (this is the DSL's responsibility)
- Share information about the incident with other members of staff, the student/intern(s) it involves or their, or other, parents and/or carers.
- Say or do anything to blame or shame any young people involved.

You should explain that you need to report the incident and reassure the student/intern(s) that they will receive support and help from the DSL.

Initial review meeting

Following a report of an incident, the DSL will hold an initial review meeting with appropriate college staff – this may include the staff member who reported the incident and the safeguarding or leadership team that deals with safeguarding concerns. This meeting will consider the initial evidence and aim to determine:

- Whether there is an immediate risk to student/intern(s)
- If a referral needs to be made to the police and/or children or adult social care
- If it is necessary to view the image(s) in order to safeguard the young person (in most cases, images or videos should not be viewed)
- What further information is required to decide on the best response
- Whether the image(s) has been shared widely and via what services and/or platforms (this may be unknown)
- Whether immediate action should be taken to delete or remove images or videos from devices or online services
- Any relevant facts about the student/interns involved which would influence risk assessment.
- If there is a need to contact another school, college, setting or individual.
- Whether to contact parents or carers of the student/interns involved (in most cases parents/carers should be involved)

The DSL will make an immediate referral to police and/or children or adult social care if:

- The incident involves an adult
- There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example, owing to SEN)
- What the DSL knows about the images or videos suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent
- The imagery involves sexual acts and any child in the images or videos is under 13
- The DSL has reason to believe a student/intern is at immediate risk of harm owing to the sharing of nudes and semi-nudes (for example, the young person is presenting as suicidal or self-harming)

If none of the above apply then the DSL, in consultation with the Principal and other members of staff as appropriate, may decide to respond to the

incident without involving the police or children or adult social care. The decision will be made and recorded in line with the procedures set out in this policy.

Further review by the DSL

If at the initial review stage a decision has been made not to refer to police and/or children or adult social care, the DSL will conduct a further review to establish the facts and assess the risks.

They will hold interviews with the student/interns involved (if appropriate). If at any point in the process there is a concern that a student/intern has been harmed or is at risk of harm, a referral will be made to children or adult social care and/or the police immediately.

Informing parents/carers

The DSL will inform parents/carers at an early stage and keep them involved in the process, unless there is a good reason to believe that involving them would put the student/intern at risk of harm.

Referring to the police

If it is necessary to refer an incident to the police, this will be done through [insert details of your existing arrangements, e.g. a safer schools officer, a police community support officer, local neighbourhood police, dialing 101.

Recording incidents

All incidents of sharing of nudes and semi-nudes, and the decisions made in responding to them, will be recorded. The record-keeping arrangements set out in section 15 of this policy also apply to recording these incidents.

Curriculum coverage

Student/interns are taught about the issues surrounding the sharing of nudes and semi-nudes as part of our tutorial programme. Teaching covers the following in relation to the sharing of nudes and semi-nudes:

- What it is
- How it is most likely to be encountered
- The consequences of requesting, forwarding or providing such images, including when it is and is not abusive and when it may be deemed as online sexual harassment
- Issues of legality
- The risk of damage to people's feelings and reputation
- Student/interns also learn the strategies and skills needed to manage:
- Specific requests or pressure to provide (or forward) such images
- The receipt of such images

This policy on the sharing of nudes and semi-nudes is also shared with student/interns so they are aware of the processes the college will follow in the event of an incident.

12. Online safety and the use of mobile technology

We recognise the importance of safeguarding student/interns from potentially harmful and inappropriate online material, and we understand that technology is a significant component in many safeguarding and wellbeing issues.

To address this, our college aims to:

- Have robust processes (including filtering and monitoring systems) in place to ensure the online safety of student/interns, staff, volunteers and governors
- Protect and educate the whole college community in its safe and responsible use of technology, including mobile and smart technology (which we refer to as 'mobile phones')
- Set clear guidelines for the use of mobile phones for the whole college community
- Establish clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate.

The 4 key categories of risk

Our approach to online safety is based on addressing the following categories of risk:

- **Content** – being exposed to illegal, inappropriate or harmful content, such as pornography, fake news, racism, misogyny, self-harm, suicide, antisemitism, radicalisation and extremism
- **Contact** – being subjected to harmful online interaction with other users, such as peer-to-peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes
- **Conduct** – personal online behaviour that increases the likelihood of, or causes, harm, such as making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography), sharing other explicit images and online bullying; and
- **Commerce** – risks such as online gambling, inappropriate advertising, phishing and/or financial scams

To meet our aims and address the risks above, we will:

- Educate student/interns about online safety as part of our curriculum. For example:
- The safe use of social media, the internet and technology
- Keeping personal information private

- How to recognise unacceptable behaviour online
- How to report any incidents of cyber-bullying, ensuring student/interns are encouraged to do so, including where they're a witness rather than a victim
- Train staff, as part of their induction, on safe internet use and online safeguarding issues including cyber-bullying, the risks of online radicalisation, and the expectations, roles and responsibilities around filtering and monitoring. All staff members will receive refresher training as required and at least once each academic year.
- Educate parents/carers about online safety. We will also share clear procedures with them so they know how to raise concerns about online safety
- Make sure staff are aware of any restrictions placed on them with regards to the use of their mobile phone and cameras, for example that:
- Staff are allowed to bring their personal phones to college for their own use, but will limit such use to non-contact time when student/interns are not present
 - Staff will not take pictures or recordings of student/interns on their personal phones or cameras.
 - Make all student/interns, parents/carers, staff, volunteers and governors / trustees aware that they are expected to sign an agreement regarding the acceptable use of the internet in college, use of the college's ICT systems and use of their mobile and smart technology
 - Explain the sanctions we will use if a student/intern is in breach of our policies on the acceptable use of the internet and mobile phones
 - Make sure all staff, student/interns and parents/carers are aware that staff have the power to search student/interns' phones, as set out in the [DfE's guidance on searching, screening and confiscation](#)
- Put in place robust filtering and monitoring systems to limit student/interns' exposure to the 4 key categories of risk (described above) from the college's IT systems.
- Carry out an annual review of our approach to online safety, supported by an annual risk assessment that considers and reflects the risks faced by our college community
- Provide regular safeguarding and children protection updates including online safety to all staff, at least annually, in order to continue to provide them with the relevant skills and knowledge to safeguard effectively.

- Review the vulnerable adult, child protection and safeguarding policy, including online safety, annually and ensure the procedures and implementation are updated and reviewed regularly

This section summarises our approach to online safety and mobile phone use. For full details about our college's policies in these areas, please refer to our online safety policy and mobile phone policies which can be found on our website, www.creatingtomorrowcollege.co.uk

13. Student/interns with special educational needs and disabilities (SEND)

We recognise that student/interns with special educational needs (SEN) and disabilities can face additional safeguarding challenges. Additional barriers can exist when recognising abuse and neglect in this group, including;

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration;
- student/interns being more prone to peer group isolation than other student/interns;
- the potential for student/interns with SEN and disabilities being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs; and/or
- communication barriers and difficulties in overcoming these barriers.

More information can be found about local support for student/interns with SEND here:

- [Northamptonshire's Local Offer: SEND Local Offer](https://www.northamptonshire.gov.uk/councilservices/children-families-education/SEND/local-offer)⁹

14. Student/interns with a social worker and those that have previously needed a social worker

Student/interns may need a social worker due to safeguarding or welfare needs. We recognise that a child/vulnerable adult's experiences of adversity and trauma can leave them vulnerable to further harm as well as potentially creating barriers to attendance, learning, behaviour and mental health. We

⁹ <https://www.northamptonshire.gov.uk/councilservices/children-families-education/SEND/local-offer>

work with the local authority to ensure that we are providing effective support for this group of student/interns.

The role of virtual school head now includes a non-statutory responsibility for oversight of the attendance, attainment and progress of student/interns with a social worker.

The DSL and all members of staff will work with and support social workers to help protect vulnerable student/interns.

Where we are aware that a student/intern has a social worker, the DSL will always consider this fact to ensure any decisions are made in the best interests of the student/intern's safety, welfare and educational outcomes. For example, it will inform decisions about;

- responding to unauthorised absence or missing education where there are known safeguarding risks; and
- the provision of pastoral and/or academic support.

We have contact plans for student/interns with a social worker, and other student/interns who we have safeguarding concerns about, for circumstances where they won't be attending college.

15. Looked after and previously looked after children

We will ensure that staff have the skills, knowledge and understanding to keep looked-after children and previously looked-after children safe. In particular, we will ensure that:

Appropriate staff have relevant information about student/interns' looked after legal status, contact arrangements with birth parents or those with parental responsibility, and care arrangements. The DSL has details of student/interns' social workers and relevant virtual school heads.

- We have appointed a designated teacher, Carole Wilson-Frizzell, who is responsible for promoting the educational achievement of looked-after children and previously looked-after children in line with [statutory guidance](#).¹⁰
- The designated teacher is appropriately trained and has the relevant qualifications and experience to perform the role.

¹⁰ <https://www.gov.uk/government/publications/designated-teacher-for-looked-after-children>

As part of their role, the designated teacher will:

- Work closely with the DSL to ensure that any safeguarding concerns regarding looked-after and previously looked-after children are quickly and effectively responded to.
- Work with virtual school heads to promote the educational achievement of looked-after and previously looked-after children, including discussing how student/intern premium plus funding can be best used to support looked-after children and meet the needs identified in their personal education plans.

16. Record-keeping

All safeguarding concerns, discussions and decisions made and the reasons for those decisions must be recorded in writing using My Concern. If in doubt about recording requirements staff should discuss this with the DSL.

When a child/vulnerable adult has made a disclosure, the member of staff/volunteer should;

- record as soon as possible after the conversation.
- Do not destroy the original notes in case they are needed by a court, hand to the DSL who will ensure they are uploaded to the as a file to the concern;
- record any noticeable non-verbal behaviour and the words used by the child/vulnerable adult;
- Use a body map to indicate the position of any injuries if relevant and attach as a file;
- record statements and observations rather than interpretations or assumptions

All records need to be given to the DSL promptly. No copies should be retained by the member of staff or volunteer.

The Designated Safeguarding Lead will ensure that all safeguarding records are managed in accordance with the Education (Student/Intern Information) (England) Regulations 2005. All concerns, discussions and decisions made, and the reasons for those decisions, should be recorded in writing. Information should be kept confidential and stored securely.

Records will 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.

Non-confidential records will be easily accessible and available. Confidential information and records will be held securely and only available to those who have a right or professional need to see them. We will hold records in line with our records retention schedule.

If a child/vulnerable adult for whom the college has, or has had, safeguarding concerns moves to another college, the DSL will ensure that their child protection file is forwarded promptly and securely, and separately from the main student/intern file.

To allow the new college to have support in place when the child/vulnerable adult arrives, this should be within:

5 days for an in-year transfer, or within

The first 5 days of the start of a new term

In addition, if the concerns are significant or complex, and/or social services are involved, the DSL will speak to the DSL of the receiving organisation and provide information to enable them to have time to make any necessary preparations to ensure the safety of the child/vulnerable adult.

Appendix C sets out our policy on record-keeping specifically with respect to recruitment and pre-employment checks. Appendix D sets out our policy on record-keeping with respect to allegations of abuse made against staff.

17. Relationships, sex and health education (RSHE)

Promoting safeguarding and welfare in the curriculum

Safety is at the heart of the curriculum for all learners in our Trust.

To be successful our learners need to feel safe and build trusting relationships. Only when we enable this will our learners be able to engage in learning activities and develop the skills necessary.

Our curriculum is based around 3 themes of safety:

- Of self – the ability to self-regulate and manage own emotions and so engage in learning experiences
- For self – the ability to be independent and autonomous (do things not only by yourself but for yourself)
- With others – the ability to manage and develop positive relationships

The college plays a crucial role in preventative education. This is in the context of a whole-college approach to preparing student/interns for life in modern Britain, and a culture of zero tolerance of sexism, misogyny/misandry, homophobia, biphobia and sexual violence/harassment. This will be underpinned by our:

Student Conduct Policy

Pastoral support system

Tutorial Programme, tackling issues such as:

- o Healthy and respectful relationships
- o Boundaries and consent
- o Stereotyping, prejudice and equality
- o Body confidence and self-esteem
- o How to recognise an abusive relationship (including coercive and controlling behaviour)
- o The concepts of, and laws relating to, sexual consent, sexual exploitation, abuse, grooming, coercion, harassment, rape, domestic abuse, so-called honour-based violence such as forced marriage and female genital mutilation (FGM) and how to access support
- o What constitutes sexual harassment and sexual violence and why they're always unacceptable

18. Safer working practice

We work to create and embed a culture of openness, trust and transparency, in which our values and expected behaviour (as set out in the staff code of conduct) are constantly lived, monitored and reinforced by all staff.

We expect all staff to act with professionalism at all times. To reduce the risk of unsafe or harmful practice, all staff should receive training on safer working practice and should be familiar with the guidance contained in the staff code of conduct and Safer Recruitment Consortium document [Guidance for safer](#)

[working practice for those working with children and young people in education settings \(September 2022\)](#).¹¹

Governors/Trustees and senior leaders will ensure that this policy is adhered to by:

- ensuring staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others through effective training;
- empowering staff to share any low-level safeguarding concerns;
- addressing unprofessional behaviour and supporting the individual to correct it at an early stage; and
- providing a responsive, sensitive and proportionate handling of such concerns when they are raised.

Governors/Trustees will help to identify any weakness in the college safeguarding system.

Staff are expected to adhere to the staff Code of Conduct at all times. In the event of any concerns or allegations, the college will deal with them promptly, in line with local guidance and KCSIE (2023).

17.1 Staff use of mobile phones

Staff are allowed to bring their personal phones to college for their own use, but will limit such use to non-contact time when student/interns are not present. Staff members' personal phones will remain in their bags or cupboards during contact time with student/interns. Staff will not take pictures or recordings of student/interns on their personal phones or cameras.

We will follow the General Data Protection Regulation and Data Protection Act 2018 when taking and storing photos and recordings for use in the college.

Please refer to the schools / college Acceptable Use of ICT Policy and Mobile Device Policy

¹¹ <https://www.saferrecruitmentconsortium.org/>

19. Safeguarding concerns about and allegations against members of staff

In the event that there is an allegation of abuse against a member of staff, we will adhere to Part 4, Section 1 (Allegations that may meet the harm threshold) and Section 2 (Concerns that do not meet the harm threshold) of KCSIE (2023) and Northamptonshire Safeguarding Children Partnership & Northamptonshire Safeguarding Adults Board guidance. See Appendix D for more details.

19.1 Allegations that may meet the harms threshold

Allegations that may indicate that a person would pose a risk of harm if they continue to work in their present position or in any capacity with student/interns in a college include:

- staff having behaved in a way that has harmed a child/vulnerable adult, or may have harmed a child/vulnerable adult;
- staff possibly committing a criminal offence against or related to a child/vulnerable adult;
- staff behaving towards a child/vulnerable adult a way that indicates they may not be suitable to work with children or vulnerable adults; and/or
- staff behaving or possibly behaving in a way that indicates they may not be suitable to work with children or vulnerable adults.

This includes behaviour or incidents that have occurred both in college and outside of college.

Allegations against the Principal, Chief Executive Officer, Chief Operating Officer or Chief Finance Officer

If an allegation is made against the Principal, CEO, COO or CFO (Trust Leadership Team), it must be reported to Jeannette Payne (Chair of Trustees) who would be the case manager. The Chair of Trustees can be contacted via email jpayne@creatingtomorrowtrust.co.uk.

Allegations against staff

If a concern or allegation of abuse arises against any member of staff, supply tutor or volunteer other than the Principal of Trust Leadership Team, it must be reported to the Principal without delay. This includes supply staff, volunteers and anyone working in or on behalf of the college, whether paid or unpaid. Allegations of abuse against staff must be reported to the Principal or Chair of Governors as appropriate and not discussed directly with the person involved.

The Principal or Chair of Governors should consider if the concern or allegation meets the threshold for Designated Officer intervention.

Allegations against staff relating to a position of trust issue will be referred to the Local Authority designated officer within 24 hours. If a child/vulnerable adult has suffered or may have suffered abuse or harm, a MASH referral will also be made and the police will be contacted if necessary.

A referral to the Disclosure and Barring Service will be made if a member of staff is dismissed or removed from their post as a result of safeguarding concerns, or would have been removed if they had not have resigned.

19.2 Safeguarding concerns that do not meet the harm threshold (low level concerns)

The term 'low-level' concern does not mean that it is insignificant, it means that the behaviour towards a child does not meet the harms threshold. 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.

It is essential that low level concerns are reported. Such behaviours can exist on a wide spectrum, from the 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.

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

Being overly friendly with student/interns

Having favourites

Taking photographs of student/interns on their mobile phone

Engaging with a child/vulnerable adult on a one-to-one basis in a secluded area or behind a closed door

Humiliating student/interns

We will act quickly, proportionately and appropriately in the event of a low level concern, to prevent abuse or harm of a child/vulnerable adult and to promote a culture of safeguarding. Dealing with low level concerns also protects those working in or on behalf of college from potential false allegations or misunderstandings.

Staff will receive training about what may constitute a low-level concern. More information can be found in Part 4 of KCSIE (2023).

Reporting low level concerns

Low level concerns should be reported to the Principal.

All low-level concerns should be recorded in writing. 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. These records will be kept securely within personal records in a sealed envelope.

The Principal may:

- Speak directly to the person who raised the concern (unless it has been raised anonymously).
- Speak to the individual involved and/or witnesses.

The Principal will then categorise the type of behaviour and decide on an appropriate course of action. This will be recorded, along with rationale for any decisions made and details of action taken.

Records will be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. In the event that patterns and/or wider cultural issues within college are identified, the college will either:

- take action through our disciplinary procedures;
- refer behaviour to the local authority designated officer/s where a pattern of behaviour moves from a concern to meeting the harms threshold; and/or
- revise policies or implement extra training as appropriate, to minimise the risk of behaviour happening again.

We will retain low level concerns information for a period of until the person is no longer employed by the college (this is recommended)

19.3 Supply staff

Although the college does not directly employ supply tutors, we will ensure that any concerns or allegations against supply tutors are handled properly. We will never cease to use a supply tutor for safeguarding reasons without finding out the facts and liaising with the Local Authority Designated Officer to reach a suitable outcome.

The Trustees will liaise with the supply agency to determine whether to suspend or redeploy the supply tutor whilst they carry out their investigation.

The college will inform supply agencies of its process for managing allegations and will take account of the agency's policies and their duty to refer to the DBS as personnel suppliers. Informing supply agencies of our process for managing allegations includes inviting the agency's human resource manager (or equivalent) to meetings and regularly updating agencies on relevant college policies.

Where you believe there is a conflict of interest in reporting a concern or allegation about a member of staff (including a supply tutor, volunteer or contractor) to the Principal, report it directly to the local authority designated officer (LADO).

20. Complaints and concerns about safeguarding policies

20.1 Complaints against staff

Complaints against staff that are likely to require a child protection investigation will be handled in accordance with our procedures for dealing with low level concerns or allegations of abuse made against staff (see Section 17).

20.2 Other complaints

When responding to complaints, we aim to:

- Be impartial and non-adversarial
- Facilitate a full and fair investigation by an independent person or panel, where necessary
- Address all the points at issue and provide an effective and prompt response
- Respect complainants' desire for confidentiality
- Treat complainants with respect and courtesy
- Ensure that any decisions we make are lawful, rational, reasonable, fair and proportionate, in line with the principles of administrative law
- Keep complainants informed of the progress of the complaints process
- Consider how the complaint can feed into college improvement evaluation processes
- We will try to resolve concerns or complaints by informal means wherever possible. Where this is not possible, formal procedures will be followed.
- Creating Tomorrow academies trust will aim to give the complainant the opportunity to complete the complaints procedure in full.
- Throughout the process we will be sensitive to the needs of all parties involved, and make any reasonable adjustments needed to accommodate individuals.

For more information please see Creating Tomorrow Complaints Procedures, these can be found on our website, or by contacting the college

20.3 Whistle-blowing

Creating Tomorrow Trust has a whistleblowing policy and this is to support all workers to be confident that their concerns will be taken seriously and that they will be protected from unfair treatment if they raise a concern.

The trust is committed to the highest standards of openness, probity and accountability. It encourages an open dialogue between staff, leaders, governors and trustees to ensure concerns are resolved at the earliest opportunity.

It is important to the college that any wrongdoing within the college is reported and properly dealt with. The college recognises that staff are valuable eyes and ears within the college, and therefore encourages all individuals with concerns to come forward and voice these.

If an individual has concerns about anything happening within the college they should read the policy, which sets out the way in which individuals may raise concerns and how they will be dealt with.

21. Use of college premises for non-college activities

Creating Tomorrow Trust is committed to working with the local community and this may include local groups / organisations using college facilities.

Use of facilities will be limited to communal areas, for example the college hall or sports gym, and no access will be given to areas where there may be access to more sensitive information, for example classrooms or the staffroom.

The college will ensure that the organisation is aware of all safety procedures, for example fire exits, and a point of contact will be given in case of emergency.

22. How we safeguard student/interns attending alternative provision

Learners at Creating Tomorrow College do not attend alternative provision.

23 Policy implementation, monitoring and review

The policy will be reviewed annually by the governing body. It will be implemented through the college induction and training programme, and as part of day to day practice. Compliance with the policy will be monitored by the Designated Safeguarding Lead and through staff performance measures.

This policy links with other college policies and procedures, including:

- Student Conduct Policy
- Staff Code of Conduct
- Whistleblowing Policy
- Anti-bullying Policy
- Complaints Policy
- Health and Safety Policy
- Attendance Policy
- E-Safety Safety Policy
- SEND Policy
- Single Equality Duty (Equality) Policy
- First Aid Policy
- Learning and Teaching Policy
- IT Acceptable Use Policy
- Privacy notices

Appendix A: Child on child abuse

(for the purpose of this policy, child on child also refers to vulnerable adults)

Child on child abuse is any abuse of a child or children that is perpetrated by another child or children. This includes all forms of sexual harassment, sexual violence and abuse. We strive to create a culture of safety, where children are free from harassment or abuse of any kind. We take a zero-tolerance approach to sexual violence and sexual harassment – it is never acceptable and it will not be tolerated.

We know that even if we do not receive any reports relating to child on child abuse, it does not mean that it is not happening. We support and encourage anyone – especially our student/interns – to come forward to share any concerns about child on child abuse so that we can take action to keep all student/interns safe.

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-nude images and or videos (also known as sexting or youth produced sexual imagery);
- upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm; and
- initiation/hazing type violence and rituals (this could include

activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).¹²

All student/interns are capable of abusing their peers and we recognise that girls are more likely to be the victims of peer on peer abuse and boys' perpetrators. All peer on peer abuse is unacceptable and will be taken seriously.

Staff training

All staff are made aware that children can abuse other children, that this can happen online or in person, at college or outside of college. All staff will receive training so that they can confidently recognise the indicators and signs of child on child abuse in order to identify it and respond appropriately to reports. All staff will be made aware of the college's policy and procedures with regards to child on child abuse and the crucial role that they play in preventing it and responding to it as necessary. It will be made clear that addressing inappropriate behaviour (even if it appears to be relatively innocuous) can be an important intervention that helps prevent problematic, abusive and/or violent behaviour in the future.

Procedures for minimising opportunities for child on child abuse

We recognise that a crucial part of our safeguarding responsibility is to minimise the opportunity for peer on peer abuse to occur. In order to do this, and to establish a safe environment for all student/interns, we:

- have a robust Student Conduct policy, which makes it clear that we have a zero tolerance approach to any kind of peer on peer abuse;
- Have communication and safety at the heart of everything we do, ensuring our student/interns and young people have a voice
- ensure staff understand what is meant by child on child abuse and the college policy on child on child abuse by ensuring part of annual staff safeguarding training, and regular safeguarding updates through the year;
- train staff thoroughly so that they challenge inappropriate behaviour (even if it appears to be relatively innocuous);
- train staff thoroughly so that they are confident to challenge

¹² Keeping Children Safe in Education (2022)

inappropriate behaviours between peers, that are actually abusive in nature;

- never downplay certain behaviours, for example dismissing sexual harassment as “just banter”, “just having a laugh”, “part of growing up” or “boys being boys”, as this can lead to a culture of unacceptable behaviours, an unsafe environment for student/interns and in worst case scenarios a culture that normalises abuse leading to student/interns accepting it as normal and not coming forward to report it; and
- recognise that sexual harassment and sexual violence, as well as other forms of child on child abuse, may be happening even if they are not reported.

How we address child on child abuse within the curriculum and across the college

Safety is at the heart of the curriculum for all learners in our Trust.

To be successful our learners need to feel safe and build trusting relationships. Only when we enable this will our learners be able to engage in learning activities and develop the skills necessary.

Our curriculum is based around 3 themes of safety:

- Of self – the ability to self-regulate and manage own emotions and so engage in learning experiences
- For self – the ability to be independent and autonomous (do things not only by yourself but for yourself)
- With others – the ability to manage and develop positive relationships

PSHE and RSE are integral elements of the college curriculum aiming to give our learners the skills to develop and maintain positive relationships. Sessions on Protective Behaviours are delivered to all students with the 2 key messages:

- We all have the right to feel safe all of the time
- We can talk with someone about anything, even if it feels awful or small

Elements of child on child abuse will be covered in an age and developmentally appropriate way such as online safety, ‘mate crime’, financial abuse, cuckooing etc.

We ensure that our systems for reporting all safeguarding concerns are well promoted, easily understood and easily accessible for learners to confidently report abuse, knowing their concerns will be treated seriously. We ensure

that student/interns are aware of our safeguarding and child protection procedures, including how to raise concerns about child on child abuse, by:

- speaking to a Trusted Adult
- having pastoral support
- highlighting who the safeguarding leads are

Additional Vulnerabilities

We recognise that some student/interns may be more vulnerable to child on child abuse than others. For example, student/interns who have already experienced abuse, those that have special educational needs or disabilities (SEND), student/interns living in care and student/interns who are LGBTQ+, may be more likely to face child on child abuse than other children/vulnerable adults. We recognise that girls are more likely to be the victims of child on child abuse than boys. Some student/interns may face additional barriers to telling anyone about abuse because of their vulnerability, disability, sex, ethnicity and/or sexual orientation. We work to protect student/interns with additional vulnerabilities by:

- Having a respectful, inclusive and open culture where discrimination is not tolerated and challenged at all levels
- Developing a Total Communication environment so those with communication difficulties have a way to be heard
- Delivering Protective Behaviours as a core theme to all learners
- Training staff to recognise signs and indicators and heighten awareness of the vulnerabilities faced by our learners

How to report concerns

Our learners

If a young person witnesses or experiences any form of child on child abuse, we strongly encourage them to speak to a trusted member of staff, parent or trusted adult about it.

If a child discloses to an adult outside of college, the adult should contact the Designated Safeguarding Lead without delay to report the issue.

All victims will be taken seriously, regardless of how long it has taken them to come forward and they will be supported and kept safe. Abuse that occurs online or outside of the college will be treated equally seriously. A victim will never be given the impression that they are creating a problem by reporting

peer on peer abuse, including sexual violence or sexual harassment. A victim will never be made to feel ashamed for making a report or have their experience minimised.

In college, learners can:

- Speak to a trusted adult
- Speak to a designated safeguarding lead
- Call a designated safeguarding lead
- Email a designated safeguarding lead

All of these methods can be used to report any form of harm or abuse can be used by students to share worried or concerns about any issue, including child on child abuse.

In the event that a student reports or discloses child on child abuse, we will take their report seriously, take prompt action to respond and to safeguard the student/interns involved and we will ensure that we are listening to the voice of the child when deciding on the best course of action to take. We will always act in the best interests of student/interns. Following any disclosures or reports of child on child abuse, we will review our college systems, training and policies to determine if any learning can be derived from the situation to further strengthen our approach to this issue. We will always encourage our student/interns to safely express their views and give feedback on how they have been supported following a safeguarding concern.

Our staff

Any member of staff that has concerns about child on child abuse should follow the procedure set out in Section 9 and must report concerns immediately.

Others

We encourage everyone to report any form of abuse or harm perpetrated by or against our student/interns. Any concerns should be reported to the Designated Safeguarding Lead, using the details on the front page of this policy.

Wider concerns

We strive to create a safe and welcoming environment for all student/interns. If you have any concerns about our culture of safeguarding, policy or

procedures, please direct these to the **safeguarding lead immediately**, or follow our college Complaints Policy.

What happens when an allegation of child on child abuse is made?

We will adhere to Keeping Children Safe in Education (2022) and the DfE guidance document 'Sexual violence and sexual harassment between children in colleges and colleges' (2021) (where applicable) when responding to incidents of child on child abuse. The college takes child on child abuse seriously and will respond to all concerns or disclosures of child on child abuse, including those that have occurred outside of college and online, immediately.

Upon receiving a concern, report or disclosure of abuse, the Designated Safeguarding Lead will decide what further action is necessary.

Our starting point regarding any report of child on child sexual harassment or violence should always be that there is a zero tolerance approach, it is never acceptable and it will not be tolerated. It is especially important not to pass off any sexual violence or sexual harassment as "banter", "just having a laugh", "part of growing up" or "boys being boys" as this can lead to a culture of unacceptable behaviours and an unsafe environment for student/interns.

The subsequent action taken will vary depending on the type of child on child abuse and the severity of the incident/s disclosed. The Designated Safeguarding Lead will take contextual factors into account when managing the report.

The Designated Safeguarding Lead will always consider the following;

- the wishes of the victim in terms of how they want to proceed. The victims will be given as much control as is reasonably possible over decisions regarding how any investigation will be progressed and any support that they will be offered;
- the nature of the alleged incident(s), including: the level of coercion or threat, whether a crime may have been committed and consideration of harmful sexual behaviour;
- both the chronological ages and developmental stages of the student/interns involved;
- any power imbalance between the student/interns, including consideration of the age of student/interns and whether student/interns have special educational needs or disabilities;
- the impact on the victim;

- that sexual violence and sexual harassment can take place in intimate personal relationships between peers;
- if the alleged incident is a one-off or a sustained pattern of abuse;
- if there are ongoing risks to the victim, other student/interns, adult students or college or college staff; and
- Other related issues and wider context, such as links to child criminal or child sexual exploitation.

Depending on the nature of the incident/s, the Designated Safeguarding Lead may

- Seek further information from those involved and witnesses.
- Undertake a risk assessment and needs assessment to ascertain steps necessary to safeguard the victim, alleged perpetrator, adults and other student/interns.
- Decide to manage the concern internally.
- Organise a meeting with relevant staff and agencies to assess risk and agree a safety plan.
- Refer the victim and/or the perpetrator to local services for Early Help.
- Refer the case to Children's or Adult Services via a MASH referral.
- Liaise with social workers working with student/interns involved (if applicable).
- Make a report to the police.
- Liaise with specialist services.

In the event of a disclosure of child on child sexual violence, we will make an immediate risk and needs assessment. The risk and needs assessment will consider:

- the victim, especially their protection and support;
- whether there may have been other victims,
- the alleged perpetrator(s); and
- all the other student/interns, (and, if appropriate, adult students and staff) at the college, especially any actions that are appropriate to protect them from the alleged perpetrator(s), or from future harms.

More information about these options in relation to sexual violence and sexual harassment can be found in Part 5 of KCSIE (2023).

Recording procedures

- Peer on peer abuse is recorded through My Concern and categorised as child on child abuse.
- College presents a Key Performance Indicator document to governors which includes specific information and analysis of

safeguarding concerns and categories

Where a case of peer on peer abuse has been identified the lead DSL, with another senior member of staff, will assess risk and put in place appropriate measures.

The risk assessment will be carefully monitored and formally reviewed monthly.

Members of staff will follow the procedures for recording a disclosure as outlined in Section 9 of this policy.

How we support victims of child on child abuse

The college recognises that child on child abuse has a significant impact on young people and victims are likely to need ongoing support. Student/interns who are victims of sexual violence and sexual harassment wherever it happens, will likely find the experience stressful and distressing. Appropriate support will be put in place for victims of child on child abuse whilst investigation is taking place and following the initial response. Support will continue for as long as it is needed and will be reviewed regularly to ensure the victim is receiving appropriate care. The college will do everything we can to maintain the victim's normal routine. We will do everything we can to protect the victim from further bullying, harassment or abuse as a result of their disclosure.

College will adhere to the following principles when support a victim of child on child abuse:

- The needs and wishes of the victim are paramount
- Consideration of the developmental stage of the victim, the nature of the allegations and risk of further abuse
- The victim should never be made to feel they are the problem for making a report or made to feel ashamed for making a report

Support that may be offered:

- In-college counselling / support
- Referral to Early Help and Social Care
- Referral to Children and Young People's Independent Sexual Violence Advisors
- Referral to Child / Teenage Adolescent Mental Health Service
- Access to NHS services
- Access / referral to Rape and Sexual Assault Centres (support to access GP or through 111)

- Childline / Internet Watch Foundation (to remove child sexual abuse online images and videos)

If a victim of child on child abuse moves to a new setting, the Designated Safeguarding Lead will share the necessary information to ensure that support for the child continues.

How we will support alleged perpetrators and perpetrators of child on child abuse

We have a responsibility to safeguard and support all student/interns. We will adhere to KCSIE (2023) when managing reports of child on child abuse and decide on action and support on a case by case basis.

The college has a responsibility to ensure that an alleged perpetrator continues to receive a suitable education and will consider a range of options in continuing educational provision if they are unable to attend college. Options may include

- Tutoring
- Access to remote education with appropriate face to face activities

We recognise that children who perpetrate child on child abuse may be being abused themselves. The college will continue to safeguard the alleged perpetrator and provide them with support.

A plan to reduce the risk posed by the alleged perpetrator will be put in place as part of the risk assessment made following the alleged abuse. The Designated Safeguarding Lead will take advice from children or adult social care, specialist services and the police as necessary.

The college may choose to impose a sanction or punishment on the alleged perpetrator following an incident of peer on peer abuse. In this case, we will follow the college Student Conduct Policy in determining the level and severity of sanction.

Where a child is cautioned or receives a conviction related to an incident of child on child abuse, the college will:

- update the risk assessment to ensure relevant protections are in place for all the learner at the college
- if not done already, consider any suitable action in line with the Relationship Policy
- If the perpetrator(s) remains in the same college as the victim, the college will be very clear as to the expectations regarding the perpetrator(s) now they have been convicted or cautioned. This could

include expectations regarding their behaviour and any restrictions the college thinks are reasonable and proportionate with regard to the perpetrator(s)' timetable.

- ensure both the victim and perpetrator(s) remain protected, especially from any bullying or harassment (including online).
- Continue to offer support to the victim and the alleged perpetrator(s) for as long as is necessary where cases are classified as “no further action” (NFA'd) by the police or Crown Prosecution Service, or where there is a not guilty verdict,

A not guilty verdict or a decision not to progress with their case will likely be traumatic for the victim. The fact that an allegation cannot be substantiated or was withdrawn does not necessarily mean that it was unfounded.

Colleges should discuss any decisions with the victim in this light and continue to offer support. The alleged perpetrator(s) is also likely to require ongoing support for what will have likely been a difficult experience.

If the alleged perpetrator moves to another setting, the Designated Safeguarding Lead will share information as necessary to safeguard the individual and other student/interns at the new setting.

If the incident is a criminal offence and there are delays in the criminal process, the DSL will work closely with the police (and other agencies as required) while protecting student/interns and/or taking any disciplinary measures against the alleged perpetrator. We will ask the police if we have any questions about the investigation.

How we will support other learners who may have been affected by child on child abuse

Even though all allegations of peer on peer abuse will be managed confidentially, we are aware that other learners, and staff, may be affected, especially if the outcome is a conviction and therefore in the public domain.

The college will offer any affected learners access to:

- Counselling, as appropriate
- Referral to external partners

The college will offer any affected staff access to:

- Supervision
- Counselling

Local Safeguarding Arrangements and making referrals

The college adheres to local safeguarding arrangements, as outlined by the Northamptonshire Safeguarding Children Partnership & Northamptonshire Safeguarding Adults Board

For further details of how the college works with partner agencies in responding to safeguarding incidents (including incidents of peer on peer abuse), please see the main body of this policy.

Parents / Carers

Parents / carers will be informed of incidents unless sharing information puts a child/vulnerable adult at greater risk of harm. Student/interns will always be encouraged to speak to parents about peer on peer abuse unless it puts them at greater risk of harm.

Whole college response

We will keep detailed records of any incidents of peer on peer abuse and will look out for potential patterns of concerning, problematic or inappropriate behaviour. Where a pattern is identified, we will take appropriate action. Consideration will be given to whether there are wider cultural issues that enabled the inappropriate behaviour to occur and in order to minimise it happening again, we may:

- Dedicate more teaching time to a particular issue or topic;
- Deliver additional staff training

Appendix B: Types of abuse

Abuse, including neglect, and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap.

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

Emotional abuse is the persistent emotional maltreatment of a child/vulnerable adult such as to cause severe and adverse effects on the child/vulnerable adult's emotional development. Some level of emotional abuse is involved in all types of maltreatment of a child/vulnerable adult, although it may occur alone.

Emotional abuse may involve:

- Conveying to a child/vulnerable adult that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person
- Not giving the child/vulnerable adult opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate
- Age or developmentally inappropriate expectations being imposed on the child/vulnerable adult. These may include interactions that are beyond a child/vulnerable adult's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child/vulnerable adult participating in normal social interaction
- Seeing or hearing the ill-treatment of another
- Serious bullying (including cyberbullying), causing the child/vulnerable adult frequently to feel frightened or in danger, or the exploitation or corruption of the child/vulnerable adult

Sexual abuse involves forcing or enticing a child/vulnerable adult to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child/vulnerable adult 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
- Non-contact activities, such as involving children/vulnerable adults in looking at, or in the production of, sexual images, watching sexual activities, encouraging the child/vulnerable adult to behave in sexually inappropriate ways, or grooming a child /vulnerable adult in preparation for abuse (including via the internet)

Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other student/interns.

Neglect is the persistent failure to meet a child/vulnerable adult's basic physical and/or psychological needs, likely to result in the serious impairment

of the child/vulnerable adult'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.

Student/interns absent from education

A student/intern being absent from education, particularly repeatedly, can be a warning sign of a range of safeguarding issues. This might include abuse or neglect, such as sexual abuse or exploitation or child criminal exploitation, or issues such as mental health problems, substance abuse, radicalisation, FGM or forced marriage.

There are many circumstances where a child/vulnerable adult may be absent or become missing from education, but some student/interns are particularly at risk. These include student/interns who:

- Are at risk of harm or neglect
- Are at risk of forced marriage or FGM
- Come from Gypsy, Roma, or Traveller families
- Come from the families of service personnel
- Go missing or run away from home or care
- Are supervised by the youth justice system
- Cease to attend a college
- Come from new migrant families

We will follow our procedures for unauthorised absence and for dealing with student/interns who are absent from education, particularly on repeat occasions, to help identify the risk of abuse and neglect, including sexual exploitation, and to help prevent the risks of going missing in future. This includes informing the local authority if a child/vulnerable adult leaves the college without a new college/organisation being named and adhering to

requirements with respect to sharing information with the local authority, when applicable, when removing a child/vulnerable adult's name from the admission register at non-standard transition points.

We will always follow up with parents/carers when student/interns are not at college. This means we need to have at least two, up to date, contacts for parents/carers. Parents/carers should remember to update the college as soon as possible where these contact details change.

Staff will be trained in signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns which may be related to being absent, such as travelling to conflict zones, FGM and forced marriage.

If a staff member suspects that a child /vulnerable adult is suffering from harm or neglect, we will follow local child protection procedures, including with respect to making reasonable enquiries. We will make an immediate referral to the local authority children or adult social care team, and the police, if the child/vulnerable adult is suffering or likely to suffer from harm, or in immediate danger.

Child criminal exploitation

Child criminal exploitation (CCE) is a form of abuse where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child/vulnerable adult into criminal activity, in exchange for something the victim needs or wants, and/or for the financial or other advantage of the perpetrator or facilitator, and/or through violence or the threat of violence.

The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse.

The victim can be exploited even when the activity appears to be consensual. It does not always involve physical contact and can happen online. Some specific forms of CCE can include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting or pickpocketing. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others.

Children/vulnerable adults can become trapped by this type of exploitation as perpetrators can threaten victims (and their families) with violence or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others. As children/vulnerable adult involved in criminal exploitation often commit crimes themselves, their vulnerability as victims is not always recognised by adults and professionals, (particularly older children), and they are not treated as victims despite the harm they have experienced. They may still have been criminally exploited even if the activity appears to be something they have agreed or consented to.

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

Indicators of CCE can include a child/vulnerable adult:

- Appearing with unexplained gifts or new possessions
- Associating with other young people involved in exploitation
- Suffering from changes in emotional wellbeing
- Misusing drugs and alcohol
- Going missing for periods of time or regularly coming home late
- Regularly missing college or education
- Not taking part in education

If a member of staff suspects CCE, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the local authority's children or adult social care team and the police, if appropriate.

County Lines

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one or more importing areas [within the UK], using dedicated mobile phone lines or other form of "deal line".

Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to move [and store] drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims.

Children/vulnerable adults can easily become trapped by this type of exploitation as county lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

Serious violence

Signs that a child/vulnerable adult is at risk from, or involved with serious violent crime include:

- include increased absence from college;
- a change in friendships or relationships with older individuals or groups;
- a significant decline in performance;
- signs of self-harm or a significant change in wellbeing;
- signs of assault or unexplained injuries; and/or
- unexplained gifts or new possessions, which could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation.

There are a range of risk factors which increase the likelihood of involvement in serious violence, such as

- being male;
- having been frequently absent from college; and/or
- having experienced maltreatment and having been involved in offending, such as theft or robbery.

If a member of staff suspects a child/vulnerable adult is involved in or at risk of serious violent crime, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the local authority's children or adult social care team and the police, if appropriate.

Child sexual exploitation

Child sexual exploitation (CSE) is a form of child sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity, in exchange for something the victim needs or wants and/or for the financial advantage or increased status of the perpetrator or facilitator. It may, or may not, be accompanied by violence or threats of violence.

The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse.

CSE can affect any child, who has been coerced into engaging in sexual activities. This includes 16 and 17 year olds who can legally consent to have sex. Some children may not realise they are being exploited e.g. they believe they are in a genuine romantic relationship.

Children and young people often trust their abuser and may be tricked into believing they are in a loving, consensual relationship.

CSE can include both physical contact (penetrative and non-penetrative acts) and non-contact sexual activity. It can also happen online. For example, young people may be persuaded or forced to share sexually explicit images of themselves, have sexual conversations by text, or take part in sexual activities using a webcam. CSE may also occur without the victim's immediate knowledge, for example through others copying videos or images.

In addition to the CCE indicators above, indicators of CSE can include a child:

- Having an older boyfriend or girlfriend
- Suffering from sexually transmitted infections or becoming pregnant

If a member of staff suspects CSE, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the local authority's children or adult social care team and the police, if appropriate.

Child abduction and community safety incidents

Child abduction is the unauthorised removal or retention of a minor from a parent or anyone with legal responsibility for the child. Child abduction can be committed by parents or other family members; by people known but not related to the victim (such as neighbours, friends and acquaintances); and by strangers. Other community safety incidents in the vicinity of a college can raise concerns amongst children and parents, for example, people loitering nearby or unknown adults engaging children in conversation.

In order to keep student safe on the way to and from college we (include safety education, information for parents)

- Have a register for students accessing local authority transport /

- parent transportation / independent travel
- Register students into / out of college
- High level of staffing at the beginning / end of the day
- Incorporate travel training into the curriculum

In order to keep learners safe at college we:

- High ratio of staff : learners
- Ability to 'lockdown' the site

In the event that anyone has concerns about child abduction or community safety incidents, they should speak to the Designated Safeguarding Lead immediately.

Cybercrime

Cybercrime is criminal activity committed using computers and/or the internet. It is broadly categorised as either 'cyber-enabled' (crimes that can happen off-line but are enabled at scale and at speed on-line) or 'cyber dependent' (crimes that can be committed only by using a computer).

Cyber-dependent crimes include;

- unauthorised access to computers (illegal 'hacking'), for example accessing a college's computer network to look for test paper answers or change grades awarded;
- denial of Service (Dos or DDoS) attacks or 'booting'. These are attempts to make a computer, network or website unavailable by overwhelming it with internet traffic from multiple sources; and,
- making, supplying or obtaining malware (malicious software) such as viruses, spyware, ransomware, botnets and Remote Access Trojans with the intent to commit further offence, including those above.

Student/interns with particular skill and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime. If we have concerns about a child and possible risk of being drawn into cyber crime, the designated safeguarding lead (or a deputy) will consider referring into the Cyber Choices programme. This is a nationwide police programme supported by the Home Office and led by the National Crime Agency, working with regional and local policing. We may also refer to children or adult social care if we think a child is suffering or is at risk of suffering harm.

Domestic abuse

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

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse (abuse in intimate personal relationships between student/interns) and child/adolescent to parent violence and abuse.

The abuse can encompass but is not limited to: psychological; physical; sexual; financial; and emotional.

All student/interns can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Domestic abuse can impact on children through seeing, hearing or experiencing the effects of domestic abuse and/or experiencing it through their own intimate relationships. 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.

Anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socioeconomic status, sexuality or background, and domestic abuse can take place inside or outside of the home. Children who witness domestic abuse are also victims.

Older learners may also experience domestic abuse and/or violence in their own personal relationships. See Appendix B: Child on child abuse for more details.

At Creating Tomorrow College, we work in partnership with North Northamptonshire Council & West Northamptonshire Council and Northamptonshire Police to identify and provide appropriate support to student/interns who have experienced domestic abuse in their household; nationally this scheme is called Operation Encompass. In order to achieve this, North Northamptonshire Council & West Northamptonshire Council will share police information with the Designated Safeguarding Lead(s) of all domestic incidents where one of our student/interns has been affected. On receipt of any information, the Designated Safeguarding Lead will

decide on the appropriate support the child/vulnerable adult requires, this could be silent or overt.

All information sharing and resulting actions will be undertaken in accordance with the '[NSCP Protocol for Domestic Abuse – Notifications to Schools](#)'. We will record this information and store this information in accordance with the record keeping procedures outlined in this policy.

The DSL will provide support according to the child/vulnerable adult's needs and update records about their circumstances.

Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare.

The DSL [and deputy/deputies] will be aware of contact details and referral routes in to the local housing authority so they can raise/progress concerns at the earliest opportunity (where appropriate and in accordance with local procedures).

Where a child has been harmed or is at risk of harm, the DSL will also make a referral to children or adult social care.

So-called 'honour-based' abuse (including FGM and forced marriage)

So-called 'honour-based' abuse (HBA) encompasses incidents or crimes committed to protect or defend the honour of the family and/or community, including FGM, forced marriage, and practices such as breast ironing.

Abuse committed in this context often involves a wider network of family or community pressure and can include multiple perpetrators.

All forms of HBA are abuse and will be handled and escalated as such. All staff will be alert to the possibility of a child/vulnerable adult being at risk of HBA or already having suffered it. If staff have a concern, they will speak to the DSL, who will activate local safeguarding procedures.

Female Genital Mutilation

The DSL will make sure that staff have access to appropriate training to equip them to be alert to student/interns affected by FGM or at risk of FGM.

Section 10 of this policy sets out the procedures to be followed if a staff member discovers that an act of FGM appears to have been carried out or suspects that a student/intern is at risk of FGM.

Indicators that FGM has already occurred include:

- A student/intern confiding in a professional that FGM has taken place
- A mother/family member disclosing that FGM has been carried out
- A family/student/intern already being known to social services in relation to other safeguarding issues
- A girl:
 - Having difficulty walking, sitting or standing, or looking uncomfortable
 - Finding it hard to sit still for long periods of time (where this was not a problem previously)
 - Spending longer than normal in the bathroom or toilet due to difficulties urinating
 - Having frequent urinary, menstrual or stomach problems
 - Avoiding physical exercise
 - Being repeatedly absent from college, or absent for a prolonged period
 - Demonstrating increased emotional and psychological needs – for example, withdrawal or depression, or significant change in behaviour
 - Being reluctant to undergo any medical examinations
 - Asking for help, but not being explicit about the problem
 - Talking about pain or discomfort between her legs

Potential signs that a student/intern may be at risk of FGM include:

- The girl's family having a history of practicing FGM (this is the biggest risk factor to consider)
- FGM being known to be practiced in the girl's community or country of origin
- A parent or family member expressing concern that FGM may be carried out
- A family not engaging with professionals (health, education or other) or already being known to social care in relation to other safeguarding issues
- A girl:
 - Having a mother, older sibling or cousin who has undergone FGM
 - Having limited level of integration within UK society
 - Confiding to a professional that she is to have a "special procedure" or to attend a special occasion to "become a woman"
 - Talking about a long holiday to her country of origin or another country where the practice is prevalent, or parents stating that they or a relative will take the girl out of the country for a prolonged period
 - Requesting help from a tutor or another adult because she is

- o aware or suspects that she is at immediate risk of FGM
- o Talking about FGM in conversation – for example, a girl may tell other children/vulnerable adults about it (although it is important to take into account the context of the discussion)
- o Being unexpectedly absent from college
- o Having sections missing from her 'red book' (child health record) and/or attending a travel clinic or equivalent for vaccinations/anti-malarial medication

The above indicators and risk factors are not intended to be exhaustive.

Forced marriage

Forcing a person into marriage is a crime. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats, or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological.

Staff will receive training around forced marriage and the presenting symptoms. We are aware of the 'one chance' rule, i.e. we may only have one chance to speak to the potential victim and only one chance to save them.

It is also illegal to cause a child under the age of 18 to marry, even if violence, threats or coercion are not involved.

If a member of staff suspects that a student/intern is being forced into marriage, they will speak to the student/intern about their concerns in a secure and private place. They will then report this to the DSL.

The DSL will:

- Speak to the student/intern about the concerns in a secure and private place
- Activate the local safeguarding procedures and refer the case to the local authority's designated officer
- Seek advice from the Forced Marriage Unit on 020 7008 0151 or fm@fco.gov.uk
- Refer the student/intern to an education welfare officer, pastoral tutor or college counsellor, as appropriate

Private Fostering

A private fostering arrangement is one that is made privately (without the involvement of a local authority) for the care of a child under the age of 16

years (under 18, if disabled) by someone other than a parent or close relative, in their own home, with the intention that it should last for 28 days or more.

A close family relative is defined as a 'grandparent, brother, sister, uncle or aunt' and includes half-siblings and step-parents; it does not include great-aunts or uncles, great grandparents or cousins.

Parents and private foster carers both have a legal duty to inform the relevant local authority at least six weeks before the arrangement is due to start; not to do so is a criminal offence.

Whilst most privately fostered children are appropriately supported and looked after, they are a potentially vulnerable group who should be monitored by the local authority, particularly when the child has come from another country. In some cases, privately fostered children are affected by abuse and neglect, or be involved in trafficking, child sexual exploitation or modern-day slavery.

Colleges have a mandatory duty to report to the local authority where they are aware or suspect that a child is subject to a private fostering arrangement. Although colleges have a duty to inform the local authority, there is no duty for anyone, including the private foster carer or social workers to inform the college. However, it should be clear to the college who has parental responsibility.

College staff should notify the designated safeguarding lead when they become aware of private fostering arrangements. The designated safeguarding lead will speak to the family of the child involved to check that they are aware of their duty to inform the LA. The college itself has a duty to inform the local authority of the private fostering arrangements.

On admission to the college, we will take steps to verify the relationship of the adults to the child who is being registered.

Preventing radicalisation

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

Extremism is vocal or active opposition to fundamental British values, such as democracy, the rule of law, individual liberty, and mutual respect and

tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces.

Terrorism is an action that:

- Endangers or causes serious violence to a person/people;
- Causes serious damage to property; or
- Seriously interferes or disrupts an electronic system

The use or threat of terrorism must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

Colleges have a duty to prevent student/interns from being drawn into terrorism. The DSL will undertake Prevent **awareness training** and make sure that staff have access to appropriate training to equip them to identify student/interns at risk.

We will assess the risk of student/interns in our college being drawn into terrorism. This assessment will be based on an understanding of the potential risk in our local area, in collaboration with our local safeguarding partners and local police force.

We will ensure that suitable internet filtering is in place and equip our student/interns to stay safe online at college and at home.

There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. Radicalisation can occur quickly or over a long period.

Staff will be alert to changes in student/interns' behaviour. The government website [Educate Against Hate](https://educateagainsthate.com/signs-of-radicalisation/)¹³ and charity [NSPCC](https://www.nspcc.org.uk/keeping-children-safe/reporting-abuse/dedicated-helplines/protecting-children-from-radicalisation/)¹⁴ say that signs that a student/intern is being radicalised can include:

- Refusal to engage with, or becoming abusive to, peers who are different from themselves
- Becoming susceptible to conspiracy theories and feelings of persecution
- Changes in friendship groups and appearance
- Rejecting activities they used to enjoy
- Converting to a new religion

¹³ <https://educateagainsthate.com/signs-of-radicalisation/>

¹⁴ <https://www.nspcc.org.uk/keeping-children-safe/reporting-abuse/dedicated-helplines/protecting-children-from-radicalisation/>

- Isolating themselves from family and friends
- Talking as if from a scripted speech
- An unwillingness or inability to discuss their views
- A sudden disrespectful attitude towards others
- Increased levels of anger
- Increased secretiveness, especially around internet use
- Expressions of sympathy for extremist ideologies and groups, or justification of their actions
- Accessing extremist material online, including on Facebook or Twitter
- Possessing extremist literature
- Being in contact with extremist recruiters and joining, or seeking to join, extremist organisations

Student/interns who are at risk of radicalisation may have low self-esteem, or may be victims of bullying or discrimination. It is important to note that these signs can also be part of normal teenage behaviour – staff should have confidence in their instincts and seek advice if something feels wrong.

If staff are concerned about a student/intern, they will follow our procedures set out in Section 9 of this policy, including discussing their concerns with the DSL. Staff should always take action if they are worried.

Further information on the college's measures to prevent radicalisation are set out in other college policies and procedures, including:

- Student Conduct Policy
- Online Safety Policy
- Learning and Teaching Policy

Missing student/interns

Our procedures are designed to ensure that a missing child/vulnerable adult is found and returned to effective supervision as soon as possible. If a child/vulnerable adult goes missing, we will:

If missing from college site:

- Contact police with full details of individual including description and clothing
- Contact parents / carers
- Staff members to make a sweep of local area in a vehicle

If missing from college care when on an off-site trip:

- Contact main college team site who will:
 - Contact police with full details of individual including

- o description and clothing
 - o Contact parents / carers
- Staff to reassure students in the group

If missing from home:

- Support parents / carers to contact police
- Follow-up conversation

All incidents will be recorded online either via My Concern or Arbor depending upon the context

[See link to NNC/WNC procedures for Children Missing Education¹⁵](#)

[See link to Luton BC procedures for Children Missing Education¹⁶](#)

Non-collection of student/interns

If a child is not collected at the end of the session/day (this may be local authority or parent pick-up), we will:

- Attempt to contact parents 1st and 2nd contacts
- Use all emergency contact phone numbers
- If no contact with parents / emergency contact notify social services:
 - o Named social worker,
 - o If no named social worker MASH
- Continue to try and contact parents

Once made contact negotiate time / mechanism for ensuring child gets home safely

Appendix C: Safer recruitment

We adhere to Part 3 of Keeping Children Safe in Education at all times. We consider safeguarding throughout the recruitment process, including when defining and advertising roles.

We will record all information on the checks carried out in the school's single central record (SCR). Copies of these checks, where appropriate, will be held in individuals' personnel files. We follow requirements and best practice in retaining copies of these checks, as set out below.

¹⁵ <https://www.northamptonshire.gov.uk/councilservices/children-families-education/schools-and-education/information-for-school-staff/pupil-support-and-inclusion/attendance-and-behaviour/Pages/children.aspx>

¹⁶ https://m.luton.gov.uk/Page/Show/Education_and_learning/Schools_and_colleges/parents-students/School_standards%20and%20attendance/Pages/Children%20missing%20in%20education.aspx

Pre-appointment safer recruitment

We will include the following in all job advertisements:

- our commitment to safeguarding and promoting the welfare of children/vulnerable adults;
- clear confirmation that safeguarding checks will be undertaken;
- the safeguarding responsibilities of the post as per the job description and personal specification; and
- whether the post is exempt from the Rehabilitation of Offenders Act 1974 and the amendments to the Exceptions Order 1975, 2013 and 2020.

Where a role involves engaging in regulated activity relevant to children/vulnerable adults, we will include a statement in the application form or elsewhere in the information provided to applicants that it is an offence to apply for the role if the applicant is barred from engaging in regulated activity relevant to children/vulnerable adults.

All applicants will be provided with a link to the Trust website and the:

- college Vulnerable Adult, Child Protection and Safeguarding Policy, and
- statement on the recruitment of ex-offenders

Applicants

We require applicants to provide:

- personal details, current and former names, current address and their national insurance number;
- details of their present (or last) employment and reason for leaving;
- full employment history, (since leaving school, including education, employment and voluntary work) including reasons for any gaps in employment;
- qualifications, the awarding body and date of award;
- details of referees/references; and
- a statement of the personal qualities and experience that the applicant believes are relevant to their suitability for the post advertised and how they meet the person specification.

We will not accept copies of curriculum vitae in place of an application form.

Shortlisting and selection

Shortlisted candidates will be asked to complete a self-declaration of their criminal record or information that would make them unsuitable to work with student/interns. For more details of what this will contain, please see Part 3 of Keeping Children Safe in Education (2023).

At least two people will carry out shortlisting and they will explore any potential concerns, including inconsistencies and/or gaps in unemployment.

We will seek references on all shortlisted candidates, including internal candidates, before interview. We will scrutinise these and resolve any concerns before confirming appointments. The references requested will ask specific questions about the suitability of the applicant to work with children.

When asked to provide references, we will ensure the information confirms whether we are satisfied with the applicant's suitability to work with children and provide the facts of any substantiated safeguarding allegations.

We will also inform candidates that we will carry out an online search on shortlisted candidates to help identify any incidents or issues that are publicly available online. (Specific guidance can be obtained from the Trust HR team)

New staff

When appointing new staff, we will:

- verify a candidate's identity. This includes demonstrating an awareness for the potential for individuals changing their name. Best practice is checking the name on their birth certificate, where this is available;
- obtain (via the applicant) an enhanced DBS check (including children's barred list information, for those who will be engaging in regulated activity with children);
- obtain a separate children's barred list check if an individual will start work in regulated activity with children before the DBS certificate is available;
- verify the candidate's mental and physical fitness to carry out their work responsibilities;
- verify the person's right to work in the UK, including EU nationals;
- If the person has lived or worked outside the UK, make any further checks the college consider appropriate;
- verify professional qualifications, as appropriate; and
- ensure that an applicant to be employed to carry out teaching work is

not subject to a prohibition order.

- Check that candidates taking up a management position are not subject to a prohibition from management (section 128) direction made by the Secretary of State.
- Carry out further additional checks, as appropriate, on candidates who have lived or worked outside of the UK. These could include, where available:
 - For all staff, including teaching positions: [criminal records checks for overseas applicants](#)¹⁷
 - For teaching positions: obtaining a letter from the professional regulating authority in the country where the applicant has worked, confirming that they have not imposed any sanctions or restrictions on that person, and/or are aware of any reason why that person may be unsuitable to teach

Regulated activity means a person who will be:

- Responsible, on a regular basis in a college, for teaching, training, instructing, caring for or supervising children; or
- Carrying out paid, or unsupervised unpaid, work regularly in a college where that work provides an opportunity for contact with children; or
- Engaging in intimate or personal care or overnight activity, even if this happens only once and regardless of whether they are supervised or not

Existing staff

If we have concerns about an existing member of staff's suitability to work with children, we will carry out all the relevant checks as if the individual was a new member of staff. We will also do this if an individual moves from a post that is not regulated activity to one that is.

We will refer to the DBS anyone who has harmed, or poses a risk of harm, to a child or vulnerable adult where:

- We believe the individual has engaged in [relevant conduct](#)¹⁸;
or
- The individual has received a caution or conviction for a relevant offence, or there is reason to believe the individual has committed a listed relevant offence, under the [Safeguarding Vulnerable Groups Act 2006 \(Prescribed Criteria and Miscellaneous Provisions\) Regulations 2009](#)¹⁹; or

¹⁷ <https://www.gov.uk/government/publications/criminal-records-checks-for-overseas-applicants>

¹⁸ <https://www.gov.uk/guidance/making-barring-referrals-to-the-dbs#relevant-conduct-in-relation-to-children>

¹⁹ <http://www.legislation.gov.uk/uksi/2009/37/contents/made>

- The 'harm test' is satisfied in respect of the individual (i.e. they may harm a child or vulnerable adult or put them at risk of harm); and
- The individual has been removed from working in regulated activity (paid or unpaid) or would have been removed if they had not left

Agency and third-party staff

We will obtain written notification from any agency or third-party organisation that it has carried out the necessary safer recruitment checks that we would otherwise perform. We will also check that the person presenting themselves for work is the same person on whom the checks have been made.

Contractors

We will ensure that any contractor, or any employee of the contractor, who is to work at the college has had the appropriate level of DBS check (this includes contractors who are provided through a PFI or similar contract). This will be:

- An enhanced DBS check with barred list information for contractors engaging in regulated activity
- An enhanced DBS check, not including barred list information, for all other contractors who are not in regulated activity but whose work provides them with an opportunity for regular contact with children
- We will obtain the DBS check for self-employed contractors.
- We will not keep copies of such checks for longer than 6 months.
- Contractors who have not had any checks will not be allowed to work unsupervised or engage in regulated activity under any circumstances.
- We will check the identity of all contractors and their staff on arrival at the college.

Volunteers

We will:

- Never leave an unchecked volunteer unsupervised or allow them to work in regulated activity.
- Obtain an enhanced DBS check with barred list information for all volunteers who are new to working in regulated activity.
- Carry out a risk assessment when deciding whether to seek an enhanced DBS check without barred list information for any volunteers not engaging in regulated activity. We will retain a record of this risk assessment.

Governance

- All trustees, local governors and members will have an enhanced DBS check without barred list information.
- They will have an enhanced DBS check with barred list information if working in regulated activity.
- The chair of the board will have their DBS check countersigned by the secretary of state.

All trustees, local governors and members will also have the following checks:

- A section 128 check (to check prohibition on participation in management under [section 128 of the Education and Skills Act 2008²⁰](https://www.legislation.gov.uk/ukpga/2008/25/section/128)). [Section 128 checks are only required for local governors if they have retained or been delegated any management responsibilities.]
- Identity
- Right to work in the UK
- Other checks deemed necessary if they have lived or worked outside the UK
- The Chair of Trustees will have their DBS check countersigned by the secretary of state.

Checking the identity and suitability of visitors

All visitors to the site will be required to sign in and wear a lanyard with an authorised visitor badge. Across our trust we operate a coloured lanyard system:

- Blue - staff, DBS cleared
- Black - Trustees / Governors DBS cleared
- Green - visitors (supply staff, contractors etc) DBS cleared
- Red - visitors, no DBS certificate - will be supervised at all times

All visitors will be required to verify their identity to the satisfaction of staff and either leave their belongings in a safe place. If keeping them with them then to ensure items such as mobile phone(s), are kept away from use.

If the visitor is unknown to the setting, we will check their credentials and reason for visiting before allowing them to enter the setting. Visitors should be ready to produce identification. Visitors are expected to sign in via visitor's book and wear a visitor's lanyard/badge.

²⁰ <https://www.legislation.gov.uk/ukpga/2008/25/section/128>

Visitors to the college who are visiting for a professional purpose, such as educational psychologists and college improvement officers, will be asked to show photo ID and the organisation sending the professional, such as the LA or educational psychology service, will provide annually written confirmation that an enhanced DBS check with barred list information has been carried out.

All other visitors, including visiting speakers, will be accompanied by a member of staff at all times. We will not invite into the college any speaker who is known to disseminate extremist views, and will carry out appropriate checks to ensure that any individual or organisation using college facilities is not seeking to disseminate extremist views or radicalise student/interns or staff.

Adults who supervise student/interns on work experience

When organising work experience, we will ensure that policies and procedures are in place to protect children/vulnerable adults from harm.

Appendix D: How the college responds to allegations that may meet the harms threshold

This section of this policy applies to all cases in which it is alleged that a current member of staff, including a supply tutor or volunteer or contractor, has:

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

It applies regardless of whether the alleged abuse took place in the college or elsewhere. Allegations against a tutor who is no longer teaching and historical allegations of abuse will be referred to the police.

If we're in any doubt as to whether a concern meets the harm threshold, we will consult our local authority designated officer (LADO).

We will deal with any allegation of abuse against a member of staff or volunteer quickly, in a fair and consistent way that provides effective child protection while also supporting the individual who is the subject of the allegation. Our procedures for dealing with allegations will be applied with common sense and judgement.

We will follow safeguarding procedures and inform the LADO if there's an allegation of an incident happening while an individual or organisation is using the college premises to run activities for children/vulnerable adults.

For more information about how the college responds to low-level concerns (concerns do not meet the harms threshold) please see Section 17 of this policy, please also see our Trust Complaints Procedures.

Suspension of the accused until the case is resolved

Suspension will not be the default position and will only be considered in cases where there is reason to suspect that a child/vulnerable adult or other children/vulnerable adults is/are at risk of harm, or the case is so serious that it might be grounds for dismissal. In such cases, we will only suspend an

individual if we have considered all other options available and there is no reasonable alternative. We will seek views from our Trust HR Business Partner, the local authority designated officer/s, the police and/or Children or adult social care (as appropriate).

Based on an assessment of risk, we will consider alternatives such as:

- Redeployment within the college so that the individual does not have direct contact with the child/vulnerable adult or children/vulnerable adults concerned.
- Providing an assistant to be present when the individual has contact with children/vulnerable adults
- Redeploying the individual to alternative work in the college so that they do not have unsupervised access to children/vulnerable adults.
- Moving the child/vulnerable adult or children/vulnerable adults to classes where they will not come into contact with the individual, making it clear that this is not a punishment and parents have been consulted.
- Temporarily redeploying the individual to another role in a different location, for example to an alternative college or other work for the Trust.

Definitions for outcomes of allegation investigations

- **Substantiated:** there is sufficient evidence to prove the allegation
- **Malicious:** there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive
- **False:** there is sufficient evidence to disprove the allegation
- **Unsubstantiated:** there is insufficient evidence to either prove or disprove the allegation (this does not imply guilt or innocence)
- **Unfounded:** to reflect cases where there is no evidence or proper basis which supports the allegation being made

Procedure for dealing with allegations

In the event of an allegation that meets the criteria above, the Principal (or Chair of Trustees where the Principal or Trust Leadership Team is the subject of the allegation) – the ‘case manager’ – will take the following steps:

- Immediately discuss the allegation with the designated officer at the local authority. This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and

whether it is necessary to involve the police and/or children or adult social care services. (The case manager may, on occasion, consider it necessary to involve the police *before* consulting the designated officer – for example, if the accused individual is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. In such cases, the case manager will notify the designated officer as soon as practicably possible after contacting the police).

- Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the designated officer (and the police or children or adult social care services, where necessary). Where the police and/or children or adult social care services are involved, the case manager will only share such information with the individual as has been agreed with those agencies.
- Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with student/interns at the college is justified or whether alternative arrangements such as those outlined above can be put in place. Advice will be sought from the designated officer, police and/or children or adult social care services, as appropriate.
- **If immediate suspension is considered necessary**, agree and record the rationale for this with the designated officer. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at the college and their contact details.
- **If it is decided that no further action is to be taken** in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the designated officer what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation.
- **If it is decided that further action is needed**, take steps as agreed with the designated officer to initiate the appropriate action in college and/or liaise with the police and/or children or adult social care services as appropriate.
- Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and considering what other support is appropriate. Further support is available through:
 - Trade Union representation
 - Employee support programs

- Health Assure (confidential counselling support available through Perkbox account).
 - Education Support: telephone number 08000 562561 or website www.educationsupport.org.uk
- Inform the parents or carers of the child/children/vulnerable adult/s involved about the allegation as soon as possible if they do not already know (following agreement with children or adult social care services and/or the police, if applicable). The case manager will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against tutors (where this applies) while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a tutor will be advised to seek legal advice
- Keep the parents or carers of the child/children/vulnerable adult/s involved informed of the progress of the case and the outcome, where there is not a criminal prosecution, including the outcome of any disciplinary process (in confidence)
- Make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child/vulnerable adult, or if the individual otherwise poses a risk of harm to a child/vulnerable adult
- If the college is made aware that the Secretary of State has made an interim prohibition order in respect of an individual, we will immediately suspend that individual from teaching, pending the findings of the investigation by the Teaching Regulation Agency.
- Where the police are involved, wherever possible the Trust will ask the police at the start of the investigation to obtain consent from the individuals involved to share their statements and evidence for use in the college's disciplinary process, should this be required at a later point.

Additional considerations for supply staff and all contracted staff

If there are concerns or an allegation is made against someone not directly employed by the college, such as supply staff provided by an agency, we will take the actions below in addition to our standard procedures.

We will never cease to use a supply tutor for safeguarding reasons without first finding out the facts and liaising with the Local Authority Designated Officer to reach a suitable outcome. The governing board will discuss with the agency whether it is appropriate to suspend the supply tutor, or redeploy

them to another part of the college, while the college carries out the investigation.

We will involve the agency fully, but the college will take the lead in collecting the necessary information and providing it to the local authority designated officer as required.

We will address issues such as information sharing, to ensure any previous concerns or allegations known to the agency are taken into account (we will do this, for example, as part of the allegations management meeting or by liaising directly with the agency where necessary).

When using an agency, we will inform them of our process for managing allegations, and keep them updated about our policies as necessary, and will invite the agency's HR manager or equivalent to meetings as appropriate.

Timescales

- Any cases where it is clear immediately that the allegation is unsubstantiated or malicious will be resolved within 1 week.
- If the nature of an allegation does not require formal disciplinary action, we will institute appropriate action within 3 working days.
- If a disciplinary hearing is required and can be held without further investigation, we will hold this within 15 working days.

Specific actions

Action following a criminal investigation or prosecution

The case manager will discuss with the designated officer whether any further action, including disciplinary action, is appropriate and, if so, how to proceed, taking into account information provided by the police and/or children or adult social care services.

Conclusion of a case where the allegation is substantiated

If the allegation is substantiated and the individual is dismissed or the college ceases to use their services, or the individual resigns or otherwise ceases to provide their services, the case manager and the college's personnel adviser will discuss with the designated officer whether to make a referral to the DBS for consideration of whether inclusion on the barred lists is required. If they think that the individual has engaged in conduct that has harmed (or is likely to harm) a child/vulnerable adult, or if they think the person otherwise poses

a risk of harm to a child/vulnerable adult, they must make a referral to the DBS.

If the individual concerned is a member of teaching staff, the case manager and personnel adviser will discuss with the designated officer whether to refer the matter to the Teaching Regulation Agency to consider prohibiting the individual from teaching.

Individuals returning to work after suspension

If it is decided on the conclusion of a case that an individual who has been suspended can return to work, the case manager will consider how best to facilitate this.

The case manager will also consider how best to manage the individual's contact with the child or children who made the allegation, if they are still attending the college.

Unsubstantiated or malicious allegations

If an allegation is shown to be deliberately invented, or malicious, the Principal, or other appropriate person in the case of an allegation against the Principal, will consider whether any disciplinary action is appropriate against the student/intern(s) who made it, or whether the police should be asked to consider whether action against those who made the allegation might be appropriate, even if they are not a student/intern.

Confidentiality

The college will make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered.

The case manager will take advice from the local authority's designated officer, police and children or adult social care services, as appropriate, to agree:

- Who needs to know about the allegation and what information can be shared.
- How to manage speculation, leaks and gossip, including how to make parents or carers of a child/children/vulnerable adult/s involved aware of their obligations with respect to confidentiality.
- What, if any, information can be reasonably given to the wider community to reduce speculation.
- How to manage press interest if, and when, it arises.

Record-keeping

The case manager will maintain clear records about any case where the allegation or concern meets the criteria above and store them on the individual's confidential personnel file for the duration of the case. Such records will include:

- A clear and comprehensive summary of the allegation.
- Details of how the allegation was followed up and resolved.
- Notes of any action taken and decisions reached (and justification for these, as stated above).

If an allegation or concern is not found to have been malicious, the college will retain the records of the case on the individual's confidential personnel file, and provide a copy to the individual.

References

When providing employer references, we will not refer to any allegation that has been proven to be false, unsubstantiated or malicious, or any history of allegations where all such allegations have been proven to be false, unsubstantiated or malicious.

Learning lessons

After any cases where the allegations are *substantiated*, we will review the circumstances of the case with the local authority's designated officer to determine whether there are any improvements that we can make to the college's procedures or practice to help prevent similar events in the future.

This will include consideration of (as applicable):

- Issues arising from the decision to suspend the member of staff
- The duration of the suspension
- Whether or not the suspension was justified
- The use of suspension when the individual is subsequently reinstated.
We will consider how future investigations of a similar nature could be carried out without suspending the individual

For referrals regarding adults in education and other information on the role of the Designated Officer please visit:

<http://www.northamptonshirescb.org.uk/schools/referrals-eha/designated-officer/>

Multi-Agency Safeguarding Hub: *North Northamptonshire 0300 126 3000 /
West Northamptonshire 0300 126 7000*

If it is decided that the allegation does not meet the threshold for safeguarding, it will be handed back to the employer for consideration via the college's internal procedures.