Safeguarding Procedures 2026/27

Essential information for all staff.

We all need to play our part in creating and maintaining a safeguarding culture by:

- Reporting concerns when we have them.
- Assuming that it can happen here.
- Being aware of the signs that someone might be at risk.
- Taking responsibility for our own conduct.

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Key Government and external references that all staff should be aware of:

Keeping Children Safe in Education – Revised September 2026
https://www.gov.uk/government/publications/keeping-children-safe-in-education--2
Working Together to Safeguard Children – Revised March 2026
https://www.gov.uk/government/publications/working-together-to-safeguard-children--2
Prevent Duty Guidance – Revised March 2024
https://www.gov.uk/government/publications/prevent-duty-guidance
Equality Act Guidance – Revised May 2026
https://www.gov.uk/guidance/equality-act-2010-guidance
Care and Support Statutory Guidance -related to safeguarding adults
https://www.gov.uk/government/publications/care-act-statutory-guidance/care-and-support-statutory-guidance

Key Contacts

The safeguarding team – who to go to for further advice and guidance

Louise Knott (Vice Principal) – Senior Designated Safeguarding Lead (DSL) and out of hours safeguarding contact
louise.knott@wnc.ac.uk

Sian Geeson (HR Director) – Deputy Senior DSL and lead for concerns related to staff.
sian.geeson@wnc.ac.uk

Kate Truscott – Link Governor for Safeguarding
Contact via the head of governance eloise.hopkinson@wnc.ac.uk

Rebecca Broomhead (Head of Safeguarding) – Deputy DSL and operational lead for responding to safeguarding concerns.

Rebecca Smith (Lead Safeguarding Officer) – Deputy DSL

Kelly McGranaghan (Lead Safeguarding Officer) – Deputy DSL

Cora Bennett (Safeguarding Officer) – Deputy DSL

Danielle Blower (Safeguarding Officer) – Deputy DSL

Jasmine Clay (Safeguarding Officer) – Deputy DSL

Laura Smith (Safeguarding Officer) – Deputy DSL

Contact the safeguarding team on: safeguarding@wnc.ac.uk

Definitions

1. Within Keeping Children Safe in Education (KCSiE) **safeguarding** is defined as:

    - providing help and support to meet the needs of children as soon as problems emerge;
    - protecting children from maltreatment, whether that is within or outside the home, including online;
    - preventing the impairment of children's mental and physical health or development;
    - ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and
    - taking action to enable all children to have the best outcomes.

2. For the purposes of this guidance, a **child** is defined as anyone under the age of 18.

3. The college also provides education and training to individuals over the age of 18, as such we carry safeguarding responsibilities for **vulnerable adults** who are defined as anyone that:

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

4. Safeguarding vulnerable adults is defined in the care and support statutory guidance as:

    - protecting the rights of adults to live in safety, free from abuse and neglect;
    - people and organisations working together to reduce the risks of abuse or neglect, and to stop them where they are occurring;
    - people and organisations making sure that those adults' well-being is promoted including, where appropriate, taking fully into account the adults' views, wishes, feelings and beliefs in deciding on any action; and
    - recognising that adults sometimes have complex interpersonal relationships and may be ambivalent, unclear or unrealistic about their personal circumstances and therefore about the potential risks to their safety or well-being.

5. For the purposed of these procedures a **student** is defined as anyone who is engaged in a programme of training or learning at the college. This includes full-time study, apprenticeships and part-time programmes of study.

Key Responsibilities

6. **All staff** whether employed directly by the college or through an external agency have a responsibility for safeguarding children and vulnerable adults. This means that staff must ensure they take responsibility for reporting concerns in a timely manner, for reading and understanding these procedures and part 1 of KCSiE and for their attendance at mandatory safeguarding training at appointment and annual safeguarding updates thereafter.

7. **All staff** whether employed directly by the college or through an external agency have a responsibility to ensure their own behaviour and conduct is in line with the college's employee code of conduct and does not place a student at risk of harm. All staff must report concerns about colleagues in line with the college's processes for staff concerns (see paragraph 47 and appendix 4).

8. **The senior DSL** carries statutory accountability for ensuring that the college's safeguarding processes and procedures are robust and in line with KCSiE. They carry specific accountability for the oversight of safeguarding referrals, for ensuring the college works effectively with other agencies and for the outcomes of young people who are known or previously known to social care.

9. **Deputy DSLs** are responsible for responding in a timely fashion to safeguarding concerns raised by staff. They are responsible for liaising with parents/carers for students under the age of 18, for liaising with employers where appropriate and where concerns relate to a college apprentice and for referring concerns to the appropriate external agencies where necessary.

10. **The governing body** is responsible for ensuring that the college's policies, procedures and training related to safeguarding is effective and compliant with the requirements of legislation. The governing body discharge this duty through the appointment of a **link governor for safeguarding.**

11. Safeguarding is a proactive duty and **all staff** have a responsibility for ensuring that the college proactively educates all learners about known and emerging risks so that learners are better able to protect themselves.

12. **Parents and carers** for students under the age of 18 - parents and carers carry the primary responsibility for protecting children.

Creating a positive safeguarding culture.

13. All staff must work on the principle that **it can happen here.** All staff must exercise appropriate **professional curiosity** and must act in the best interests of students and their safety and well-being at all times.

14. Safeguarding concerns may arise through a formal **disclosure** – that is a student telling us that they feel at risk of harm, or a **concern,** that is something that you feel may be placing a student at risk of harm. Disclosures must be reported to the safeguarding team immediately, whereas you may choose to report a concern immediately or seek further advice and guidance. **If in doubt report concerns immediately.**

15. All concerns raised by students should be listened to and taken seriously, the college actively encourages students to share concerns with the college and operates on the principle of open engagement with them. We will always **seek to understand**, to listen very carefully to the views and wishes of students and parents/carers and always act in the best interests of students.

16. Students may not feel ready or know how to tell someone that they are being harmed, abused, exploited or neglected and may not necessarily recognise their experience as harmful. Staff should build **trusting professional relationships** with students that may eventually help them to share their experiences and should always exercise professional curiosity and act appropriately if they feel a student is at risk of harm.

17. There are certain indicators that might suggest a student may be at risk of harm, these might be:

    - **Attendance/absence** – can often be the first indicator that a student is at risk of a range of harms including neglect, child sexual and criminal exploitation. Particularly vulnerable students (those known to social care and those with significant safeguarding risks) are indicated as 'high risk' on the college's register system. Where staff have concerns that absence may be related to a safeguarding risk this should be reported through the college's processes.
    - **Appearance** – we should be aware that appearance may provide us with an indicator that a student may be at risk of harm. For example, students who self-harm may try and hide evidence by covering up; unexplained or unusual marks or bruising may be an indicator of physical abuse and students who appear unkempt may be at risk of neglect.
    - **Attitude** – behaviour can often be a form of communication and may be an indicator that a student is at risk of harm. Behaviour can manifest in many ways and could be angry or aggressive behaviour but similarly students who appear withdrawn may be equally at risk of harm. Staff should also be aware that risk taking behaviours linked for example to drug taking, alcohol abuse, involvement with criminal activity and the sharing of self-generated intimate images (including those generated using AI), may be indicators that a student is at risk of harm.

18. Staff need to be aware that **students can abuse other students (child on child/student on student abuse)** this could take the form of online abuse as well as face to face and abuse and can happen both inside and outside of college. We are all

responsible for creating an environment which is safe and free from such abuse. It is essential that we do not 'downplay' such behaviours and/or dismiss them as banter. We must challenge such behaviours when we see them, not doing so can lead to a culture of unacceptable behaviour with students accepting it as the 'norm' and not coming forward to report it. Child on child/student on student abuse is a safeguarding issue for both victim and alleged perpetrator. Child on child or student on student abuse is often preventable and can involve serious physical harm or threats involving weapons. Child on child/student on student abuse can take different forms such as:

- Bullying including cyber-bullying and prejudice-based bullying;
- Abuse in intimate personal relationships;
- Physical abuse including kicking, hitting, shaking and biting;
- Physical assault and harm or the threat of harm with a weapon;
- Harmful sexual behaviour, sexual violence and sexual harassment;
- Consensual and non-consensual sharing of nudes and semi-nudes including those generated by AI;
- Causing someone to engage in sexual activity without consent;
- Upskirting; and
- Initiation/hazing type violence or rituals.

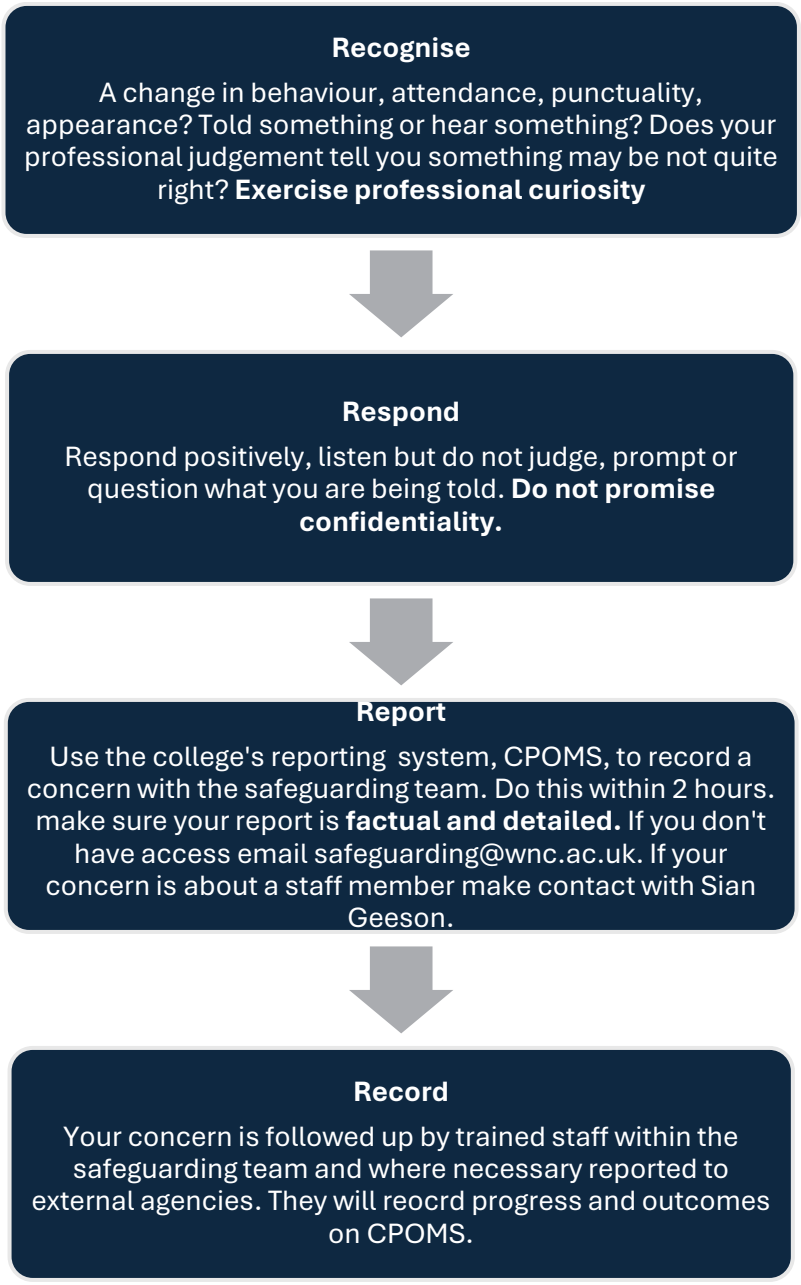
19. Students may be put at risk of harm by factors outside the home environment, this is known as **contextual safeguarding**. Extra-familial harm takes a variety of different forms and students can be vulnerable to multiple harms including sexual harms, domestic abuse in their own intimate relationships, (including physical, sexual and emotional abuse, stalking) criminal exploitation (including financial exploitation) and serious violence. It is important, therefore, that staff provide as much factual information as possible when reporting concerns.

20. All staff should be aware that often specific safeguarding issues overlap and can put children at risk of harm. The following behaviours and indicators can be signs that a student is at risk of harm:

    - Drug and/or alcohol misuse;
    - Unexplainable and/or persistent absences from college;
    - Involvement with serious violence, criminal exploitation (including county lines), radicalisation; and
    - Consensual and non-consensual sharing of self-generated intimate images including those generated by AI e.g deep fakes and/or videos.

Reporting safeguarding concerns – what staff need to do.

21. Staff must respond quickly to any concern, concerns should be reported through the CPOMS system **immediately and no longer than two hours from the initial concern. All safeguarding or prevent concerns should be reported in this way.** Our processes for reporting concerns are detailed below:



22. **Out of hours urgent** safeguarding concerns should be reported to the senior DSL, Louise Knott, on her mobile contact number, published on the college's staffnet. Out of hours concerns are those assessed to be urgent which come to staff's attention after 5pm in the evening (4.30pm on a Friday) and at weekends. We expect staff to make an assessment of the urgency of the situation but as a general guide it would be any

concern that would put that individual at significant and serious risk of harm/serious injury. **If in doubt make contact with the senior DSL.**

23. There may be occasion where the senior DSL is not available. In this case we would expect staff to make contact with the relevant agency and report their concerns directly. This could include making a referral to the relevant social care duty teams In Nottinghamshire - the multi-agency safeguarding hub (MASH) team themselves at the following web link https://www.nottinghamshire.gov.uk/care/safeguarding/childrens-mash, for students residing in Derbyshire referrals should be to the Starting Point service https://www.derbyshire.gov.uk/social-health/children-and-families/support-for-families/starting-point-referral-form/starting-point-contact-and-referral-service.aspx . Other concerns may be more appropriately dealt with by emergency services such as the police or ambulance service and these should be reported by dialling 999. Staff should let the safeguarding team know that a referral has been made.

24. Concerns raised via the CPOMS system will be assessed using a triage system, with the team responding to the most urgent concerns first. Detailed records of action taken will be kept in the system including any referrals to external agencies.

25. For students under the age of 18, there is an expectation that where a young person is at risk of harm parents will be informed, **the consent of the student is not required before parents are contacted**. Parents would not be informed where this may place the young person at greater risk of harm and this decision making will be logged on the system.

26. The safeguarding team would **usually seek consent** to inform next of kin where students are over the age of 18, however, consent can be overridden if there is a risk of significant and serious harm, in such cases, the senior DSL or head of safeguarding will authorise over-riding consent.

27. **Sharing information** is essential to effective safeguarding practice and is enshrined within Working Together to Safeguard Children and KCSiE. Whilst the college is compliant with relevant data protection legislation, this should never be used as an excuse to not share information where this is in the best interests of the student. Safeguarding of children and individuals at risk is a GDPR processing condition that allows practitioners to share special category data. This includes allowing practitioners to share information without consent where there is good reason to do so. The safeguarding team are normally the ones to share data and information staff should seek their advice about about sharing information with other professionals if they are in doubt. Any information shared with an external agency must be done so in a secure way.

Community Based Early Help/Family Support

28. Students under the age of 18 and their families may benefit from early intervention through community based early help or family support hubs. All college staff should be able to identify young people who might benefit from Early Help and should be particularly alert to the potential need for early help for a young person who:

    - is disabled or has certain health conditions and has specific additional needs;
    - has special educational needs whether or not they have an education health and care plan;
    - has a mental health need;
    - is a young carer;
    - is pregnant or is a parent themselves;
    - is showing early signs of abusive, violent and/or harmful behaviour;
    - is showing signs of being drawn into anti-social or criminal behaviour, including gang involvement, and association with organised crime groups or county lines;
    - is frequently missing/goes missing from home or from care;
    - has been repeatedly removed from the classroom, has experienced multiple suspensions, is at risk of being permanently excluded from college;
    - is at risk of exploitation, modern slavery, trafficking or exploitation;
    - is at risk of being radicalised into terrorism;
    - has a parent or carer in custody, or is affected by parental offending;
    - is in a family circumstance presenting challenges for the young person such as substance misuse, adult mental health problems or domestic abuse;
    - is mis-using drugs or alcohol themselves;
    - is at risk of honour or faith based abuse, such as Female Genital Mutilation or Forced Marriage; and/or
    - is a privately fostered child or is living outside of parental accommodation but not in the care of the local authority.

29. Staff should seek advice from the welfare, inclusion or safeguarding team where they feel a student under the age of 18 may benefit from such support. The college may be best placed to act as lead practitioner in any early help intervention, and, where this is the case, the safeguarding team will lead this for the college. Regardless of who performs the role of lead practitioner, the college will be expected to play a full part in team around the child/family meetings, all staff should respond in a timely manner to requests for information to support this process.

Factors that may indicate heightened risk.

30. **Special educational needs and disabilities (SEND).** Students with SEND needs are more likely to be isolated physically, geographically and socially and to experience feelings of rejection because of this. They are less likely to use mainstream facilities and resources and they are more likely to have communication difficulties. They may have little confidence and low self-esteem. There exists the potential for exploitation by more able peers and the misinterpretation of the nature of behaviour between young people themselves. We must not assume that indicators of possible abuse such as behaviour, mood and injury relate to the student's disability without further exploration. Students may come to college with an Education, Health and Care Plan (EHCP) in some cases the

EHCP might detail factors that make a student inherently more vulnerable to safeguarding concerns.

31. **LGBT**. The fact that a student is LGBT is not in itself a safeguarding issue, however, LGBT students can be targeted by their peers. Risks can be compounded where students do not have a trusted adult with whom they can open up to. It is therefore vital that staff endeavour to reduce the additional barriers faced and provide a safe space for them to speak out about any concerns and be themselves in college. As with all other forms of bullying and child on child abuse the college operates a zero-tolerance policy.

32. **Students known or previously known to social care including care experienced students.** Where students need a social worker, this may indicate heightened safeguarding risks. A young person's experience of adversity and trauma can leave them vulnerable to further harm as well as facing barriers to attendance, learning, behaviour and mental health. The safeguarding team will keep on file a record of all students with a social worker, whether or not they are placed on a formal plan for protection. We will work closely with the social care team to promote and protect the best interests of that student and will inform the college's procedures in relation to unauthorised absence and promoting welfare. Every student with a social worker will automatically receive pastoral support from either the safeguarding or welfare teams. College staff should be aware of the circumstances surrounding students who are care experienced, the most common reason for children becoming looked after is as a result of abuse and/or neglect. The college employs a specialist care experienced team and all staff should liaise with them regarding our care experienced students and some of the heightened safeguarding risk. A previously looked after child remains at risk and all staff should work together to keep care experienced young people safe. The college will work proactively with other agencies to take prompt action where necessary to safeguard these young people.

33. **Domestic Violence.** Students can be the victim of abuse and may see, hear or experience the effects of domestic abuse at home and/or suffer domestic abuse in their own intimate relationships. All of which can have a detrimental impact on their health, well-being, development and ability to learn.

34. **Mental health.** Mental health problems can, in some cases, be an indicator that a student has suffered or is at risk of suffering abuse, neglect or exploitation. The college works with external statutory mental health agencies, only staff that are appropriately trained should make a diagnosis of mental health issues but all staff are well placed to observe students day to day and identify those whose behaviour may suggest that they are experiencing a mental health difficulty.

Responding to specific statutory guidance and responsibilities

35. **Gender questioning children.** KCSiE introduced statutory guidance for schools and college in terms of how they respond to children who may be questioning their gender. As such when a student under the age of 18 discloses they may be questioning their gender the college will:

    - Take time to consider the thoughts and feelings of the student questioning their gender.
    - Remain aware of the potential vulnerabilities of students questioning their gender.
    - Be aware of the heightened risk of bullying and take appropriate and timely action to prevent such bullying occurring.

36. When considering requests for social transition (name changes and a change of pronouns), the college will consult the parents/carers of students under the age of 18. Where students are reluctant to speak to parents or carers, the college will explore how it may support such conversations and will only consider such requests without parental engagement where such consultation would put the student at significant risk of harm.

37. Where a student confides in a member of staff about their feelings around gender but does not ask the college to make changes, there is no reason for the college to break confidence and speak to parents/carers unless there is a related safeguarding risk.

38. The college will consider what is in the best interest of the student when considering request for social transition, as such, decisions around social transition may not be the same as the wishes of the student. The college will take a very careful approach when agreeing to requests for social transition and will discuss fully with the student the implications of such changes. The college maintain a level of flexibility that enables the student to keep their options open.

39. The college will not allow students into toilets and changing rooms designated for the opposite biological sex. Similarly, students on overnight trips and visits will not be allowed to share residential accommodation with someone of the opposite biological sex. Where the college is supporting a student who has requested social transition and this has been agreed, alternative arrangements will be considered such as single use toilets and single room if on a residential trip.

40. Staff should seek support from the welfare or safeguarding teams in relation to how to support students who may be questioning their gender.

41. **Child on child/student on student sexual harassment and violence.** The college will take account of Government advice when considering how to respond to allegations of child-on-child sexual violence and sexual harassment. Reports of sexual violence or sexual harassment are likely to be complex and will require difficult professional decisions to be made. It is important to assure all victims that their concerns are being

taken seriously and that they will be supported and kept safe. The safeguarding team will make an immediate risk assessment and will take into account both the victim and the alleged perpetrator, for issues that suggest serious sexual assault or rape the college will complete a specialist risk assessment related to sexual harassment and violence. The college will also consider:

- The wishes of the victim.
- The nature of the alleged incident and whether any crime has potentially been committed.
- The ages of the people involved.
- Any power imbalance between victim and perpetrator.
- Risk factors and vulnerabilities of both victim and perpetrator.
- If the alleged incident is a one off or a substantiated pattern.
- Any ongoing risks to the victim, other students or college staff.
- Other related issues and the wider context.

42. For more detailed guidance on definitions of sexual harassment, sexual violence and harmful sexual behaviour see appendix 2.

43. All staff should be able to reassure victims that they are being taken seriously and that their concerns will be reported and they will be kept safe. A victim should never be given the impression that they are creating a problem by reporting abuse, sexual harassment or sexual violence. Victims should never be made to feel ashamed for making a report.

44. **Online safety.** An important part of the college's safeguarding approach is safeguarding students from potentially harmful online material. The college utilises monitoring software, Smoothwall, to detect potential online harms or harmful online communication on college devices and has deployed web filtering and monitoring software to ensure that students cannot view harmful content on a college device or through the college's Wi-Fi systems. The college consider online risk in four broad categories:

    - Content – being exposed to illegal, inappropriate or harmful content for example pornography, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism, misinformation, disinformation (Including fake news) and conspiracy theories;
    - Contact – being subjected to harmful online contact and interaction with other users or generative AI applications that simulate this, for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom and exploit them for sexual, criminal, financial and other purposes.
    - Conduct – online behaviour that increases the likelihood of harm for example, making and sharing of nudes/semi-nudes, pornography, sharing explicit images, including those generated by AI and online bullying; and
    - Commerce – risks such as online gaming, inappropriate advertising, phishing and or financial scams.

45. The college's approach to online safety extends to the use of artificial intelligence (AI) and generative AI.

46. The college's online safety policy is attached to these procedures at appendix 3.

47. **Child criminal exploitation (CCE) and child sexual exploitation (CSE)** are forms of abuse that occurs where an individual takes advantage of an imbalance of power to coerce, manipulate or deceive a child into taking part in criminal or sexual activity. This type of exploitation can be facilitated by organised gangs and victims may identify as part of this group. Children can become trapped as perpetrators can threaten victims and their families. It is not possible for a child to give informed consent to engage in criminal, sexual or other exploitative activity even though they may feel they are engaging in such activity willingly.

48. **Preventing students from being drawn into terrorism – the prevent duty.** Staff should have an understanding of the local risks in relation to prevent and be able to identify the key risks that may suggest that a student is being radicalised into terrorism. Concerns of this nature should be reported through the college's safeguarding procedure. An assessment will be undertaken by the safeguarding team in relation to whether the concern would meet threshold for a prevent referral. External guidance and support is provided to the college by Nottinghamshire Emerging Threats Team and the regional prevent coordinator. The college's prevent risk assessment will be updated on at least an annual basis and reviewed every term.

49. **Female Genital Mutilation (FGM)**. Staff need to be aware of the mandatory reporting duty in relation to FGM. Any staff member, who in the course of their work, discovers that an act of FGM appears to have been carried our on a girl under the age of 18 they must make a report to the police. Concerns of this nature should be reported to the safeguarding team who will support the member of staff to make the necessary and appropriate referral to the police.

Reporting concerns about the conduct of staff members

50. Detailed guidance on our processes for reporting concerns about staff members are attached at appendix 4.

51. Any suspicion, allegation or actual abuse of a student by a member of staff, including supply staff, volunteers and contractors, **must be reported to the Deputy Senior DSL, Sian Geeson** immediately.

52. In the event of a concern about a senior post holder (the principal, vice principals and chief finance officer), **the head of governance** should be informed and should consider at what stage the Corporation Board must be notified, with full consideration at all times of the alleged victim.

53. Staff can also make direct contact with the local authority designated officer (LADO) should they wish to raise concerns about senior staff members or wider safeguarding practice.

54. All staff should be aware of professional boundaries and **must** not cross them, they also need to be aware that their relationships and associations (including online) may have a safeguarding implication. Staff should be familiar with the staff code of conduct and follow guidelines within them.

55. The college has a duty to ensure that all staff and volunteers who work with children under the age of 18 are suitable to work with children. Staff may behave in a way that may call into question their suitability to work with children and these allegations or actions may take place outside of the college environment and may not directly involve children, for example a member of staff may be accused of a domestic violence incident where no children were involved. The college will consider what triggered such action and the potential for such triggers to be present within the college (transferability of risk). The college reserves the right to attend any court proceedings related to incidents with staff members where there is some question, as a result of the incident, that the individual may no longer be suitable to work with children and young people. Staff should report where they may be involved with ongoing police investigations or with social care for their own children as this may need to be referred to the LADO for further investigation.

56. Staff may receive concerns or allegations related to the conduct of staff employed by a third party, for example, a partner, community group, employer or work placement provider. As with any concerns about staff members, these concerns should be reported to the senior or deputy senior DSL as soon as possible so that escalation to the LADO and the third party can be managed appropriately.

Raising concerns about safeguarding practice

57. An important part of establishing and maintaining a robust safeguarding culture is creating an environment where staff feel able to raise concerns about safeguarding practice. The college encourages staff to raise concerns where they feel that our response to a safeguarding concern has not been as robust as it should be. In the first instance staff can make contact with the senior DSL to raise such concerns or can make contact with the safeguarding link governor via the head of governance. Concerns will be responded to in an open and transparent manner.

58. Where staff feel unable to contact the senior DSL they can use the college's whistleblowing procedures available on staffnet or can make direct contact with the local authority designated officer LADO.

Appendices

Appendix 1

Safeguarding Policy Statement

Introduction, Scope and Purpose

1. Safeguarding is an all-encompassing term used to describe many aspects of keeping our students safe, which includes:
   - Student health, safety and wellbeing
   - Child protection
   - Protection of adults at risk
   - Bullying, harassment and discrimination including racial abuse
   - Self-harm
   - Child on child/student on student abuse including sexual harassment and sexual assault
   - Abuse and neglect
   - Domestic violence
   - Safety from sexual exploitation, criminal exploitation, female genital mutilation and forced marriage
   - Criminal exploitation and county lines
   - Alcohol, drug and substance misuse
   - E-safety including all aspects of electronic communication
   - Financial exploitation
   - Protecting people from radicalisation and extremism
   - The security and safety of the College campus or place of learning

2. The policy covers all College students whether they are based on campus, on a visit, at a work placement or in workplace learning; it covers all aspects of a student's programme regardless of where it takes place. It is the responsibility of all staff to understand their role in supporting safeguarding across all aspects of provision and for familiarising themselves with the appropriate procedures and other policies that support this overarching document.

Key Principles

3. The College will operate within the following key principles when it relates to safeguarding:

   - All people will be treated with respect and with courtesy by staff and students in an environment that is free from harassment or discrimination.
   - All training rooms, communal areas, facilities and equipment will comply with legislative health and safety standards.
   - The College will work with students and other agencies to promote a safe and healthy culture.

- The College will develop partnerships to proactively protect students at risk of abuse, neglect or at risk of radicalisation.
- The college will have procedures in place to identify and respond to those students who might benefit from early help, recognising that the earlier help is in place the more effective it is for the individual.
- Staff will be trained and will have a clear understanding of personal safety and good safeguarding practices as well as what factors may make students vulnerable to a range of safeguarding concerns.
- The College will work with students to promote their own personal health, well-being and safety including their safety online.
- The College will work proactively to raise awareness of radicalisation and extremism in order to prevent people from being drawn into terrorism.
- Students will receive confidential advice, guidance and support for a range of issues that they may face. They will be signposted to external agencies where specialist support is required.

The College will support students to have personal resilience and be able to make informed and sensible decisions about their safety and wellbeing in an attempt to prevent them from being exploited and or abused.

Students' Entitlement

4. In order to promote a healthy and a safe environment, our students will be entitled to the following:

    - The right to make a disclosure to any member of staff and know that the disclosure will be dealt with quickly, sensitively and appropriately.
    - To learn in an environment free from bullying or harassment.
    - To be made aware of strategies and actions that to keep themselves safe whether in college, outside college or online.
    - To be made aware of the basic principles of safe learning and safeguarding relevant to the programme that the student is completing.
    - To be made aware of how to access support on personal health and safety issues either within the College or from outside agencies.
    - To be provided with up to date information around personal safety issues.
    - The opportunity to comment and feedback on the extent to which the College and courses promote and maintain well-being and personal safety.
    - Learn about interpersonal and communication skills that promote and establish a welcoming, safe and respectful environment.

Strands of Activity

5. The safeguarding efforts of the College are supported by the following core strands of activity, where relevant, working procedures and other policy documents have been signposted within this section.

    Safe learning

6. The principles of the 'Keeping children safe in education' and safeguarding agendas will be embedded within the College's teaching and learning practices and within the College's quality assurance and quality improvement frameworks. Safe recruitment practices will be implemented as outlined in the relevant section of this policy.

7. The College is committed to engaging students on issues related to financial health, mental health and physical health – in order to improve their quality of life. The aim is to provide students with the tools to make healthy and safe decisions.

8. The College's commitment to safe learning is enshrined within the following policies and procedural documents: guide to outstanding teaching, learning, training and assessment; the tutorial policy; the quality assurance and quality improvement strategy; the teaching, learning, training and assessment observation policy; student code of conduct and disciplinary procedure and as appropriate HR policies and procedures.

Safe environment

9. The College will provide an environment that is safe and secure for all users, whilst at the same time is friendly and welcoming. Robust systems and processes will be in place for staff and student identification and for visitor registration. A culture of respect that is free from bullying and harassment will be engendered. Health and safety is of paramount importance and must never be compromised or short cut; as such all facilities and resources will comply with legislative requirements for health and safety.

10. The College's commitment to the safe environment is enshrined within the following policy and procedure documents: the health and safety policy and manual; the IT acceptable use policy for students and the incident reporting procedures.

Safe recruitment

11. The College will comply with best practice in the recruitment and training of its staff, in line with legislative requirements. Staff will undergo the appropriate pre-employment checks including DBS checks for their role where applicable, and undertake mandatory safeguarding training appropriate to their role. Staff will understand the principles of safe working practices, as outlined in the Safe Working Practices at West Nottinghamshire College document and the Code of Conduct, and how not to put themselves in situations that compromise themselves or students. All new starters will receive an appropriate induction, including safeguarding training.

Safeguarding students

12. The College has a legal obligation to protect young people and vulnerable adults from abuse. The College has an appropriately trained safeguarding manager, DSL and other staff that form a 'safeguarding team' who will ensure that disclosures made by students are dealt with quickly, sensitively and appropriately. All staff will be trained in the appropriate response to a student disclosure and the correct procedure for dealing with concerns about a student. Teams will work with students to proactively protect them from abuse and neglect and prevent students being placed in an abusive situation.

13. The College's commitment to the protection of young people and vulnerable adults is enshrined within the Safeguarding Procedure.

Preventing people from being drawn into terrorism

14. The College has certain duties enshrined within the Counter Terrorism and Security Act 2015. All staff are aware of their *Prevent* duties and the College has robust processes in place to respond to concerns about students and staff members. There is a proactive and positive tutorial programme that enables students to explore and discuss issues in a safe and open environment.

15. The College's commitment to *Prevent* is encapsulated within the *Prevent* policy, risk assessment and action plan and has been incorporated into the Speakers and Events Policy, IT acceptable use policy and safeguarding procedures.

Governance and reporting

16. The College has an established safeguarding steering group to oversee its work in this area. The steering group is chaired by a member of the Executive Team and meets at least once per term. A governor is a member of this steering group.

17. The Standards Committee of the Corporation Board receives a safeguarding update at each of its meetings; this report outlines progress against the College's development plan for safeguarding as well as providing anonymous reports of safeguarding incidents.

Key Responsibilities

The Corporation Board – will have overall responsibility for ensuring that the College meets its obligations within this area. They will be responsible for the approval of relevant safeguarding policy.

The Senior DSL – will be the Vice Principal: Communications, Engagement and Student Experience. They will be responsible for ensuring that the safeguarding processes and procedures are robust and consistently applied and that the College fulfils its legal duties as enshrined within legislation. They will be the first point of contact for complaints made against staff and will liaise with the Local Area Designated Officer on all such matters.

The Chair of the Safeguarding Steering Group – will be the Vice Principal: Communications, Engagement and Student Experience. They will be responsible for ensuring that the College is proactive in the promotion of safeguarding, the production and monitoring of a safeguarding development plan and for providing regular reports to the College's Executive Team, Standards Committee and Corporation Board.

The Director of Human Resources – is responsible for ensuring that safe recruitment practice is embedded and implemented across the College, that the single central record is accurately maintained and that all staff have received appropriate training and development. As Deputy Senior DSL they have specific responsibility for responding to concerns about staff.

The College Leadership Team and the Executive Team – will be responsible for ensuring that all staff have an understanding of safeguarding and have received appropriate training and development and that the staff recruitment and selection procedure is followed at all times. They will ensure that safeguarding is given high priority within their teams.

All employees - will have a responsibility for completing their training, familiarising themselves with *Keeping children safe in education: safeguarding information for all staff* the Safeguarding Procedure, and any other related safeguarding policies and procedures. They are also responsible for ensuring they understand their own role in the promotion of safeguarding and the appropriate action to be taken should they receive a disclosure or have concerns about a student.

Further Information, Advice and Guidance

Information, advice and guidance can be sought from any of the following:

- Vice Principal: Communications, Engagement and Student Experience
- Vice Principal: Curriculum and Quality
- Head of safeguarding
- Safeguarding Officers
- The Health and Safety team
- Staffnet contains all of the documents mentioned within this policy

Appendix 2

Procedure for dealing with allegations of child on child sexual violence and sexual harassment (including online)

Introduction

1. Sexual violence and sexual harassment can occur between two students of any age and sex. It can occur through a group of children sexually assaulting or harassing a single young person or a group of young people. Issues exist on a continuum and can occur face to face and online. The college maintains an attitude of **it can happen here**.

2. Addressing inappropriate behaviour (even if it appears relatively low level) is important in developing a culture where harassment of any kind is not tolerated, where concerns are taken seriously and appropriate action taken to keep young people safe.

3. Students who are victims of sexual violence and sexual harassment are likely to find the experience stressful and distressing. This may adversely affect their educational attainment and these factors are likely to be exacerbated if the alleged perpetrator also attends college.

4. Along with providing support to victims, the college will weigh the need to provide the alleged perpetrator with an education, with welfare support and the need to implement any disciplinary sanctions.

5. The college has a zero tolerance to any form of abuse or harassment and this extends to sexual violence and sexual harassment. The college recognises that abuse is abuse and will never be tolerated or passed off as 'banter', 'having a laugh' or 'just part of growing up'. The college recognises the gendered nature of child on child abuse but will take all forms of peer on peer abuse seriously.

6. Children with special educational needs and disabilities (SEND) are three times more likely to be abused by their peers. Additional barriers can exist to identifying abuse and this may include dismissing indicators of abuse as part of an individual's identified need. It is therefore essential that we never dismiss concerns raised by young people with SEND.

Definitions

7. **Sexual violence**, these are largely offences under the Sexual Offences Act 2003 and include:

    - Rape – intentional sexual penetration of the vagina, anus or mouth of the victim with the perpetrator's penis without consent.
    - Assault by penetration – intentional sexual penetration of the vagina or anus with a part of his/her body or other object without consent.
    - Sexual assault - intentionally touching another person in a sexual way without consent, this covers a wide range of behaviour in that a single act of kissing or touching of the bottom or breast without consent can still be considered sexual assault.

- Causing someone to engage in sexual activity without consent – this can include forcing someone to strip, to touch themselves sexually, or to engage in sexual activity with a third party.

8. **Sexual Harassment** – this relates to unwanted conduct of a sexual nature that can occur online and both inside and outside of college. Sexual harassment is likely to violate a student's dignity and/or make them feel intimidated, degraded and/or humiliated. Sexual harassment can include but is not limited to:

    - Sexual comments – telling stories, making lewd comments, making sexual remarks about clothes or appearance and calling someone sexualised names;
    - Sexual jokes or taunting;
    - Physical behaviour such as deliberately brushing against someone, interfering with someone's clothes, displaying pictures, photos, or drawings of a sexual nature; and/or
    - Online sexual harassment, this may be standalone or part of a wider pattern and may include consensual or non-consensual sharing of nudes or semi-nudes, sharing explicit and unwanted content, upskirting, sexualised online bullying, unwanted sexual comments and messages and sexual coercion or threats.

9. **Harmful sexual behaviour** – sexual behaviour exists on a wide continuum from normal and developmentally appropriate to problematic abusive or violent. Figure 1 below provides more detail. Harmful sexual behaviour is an umbrella term widely used in child protection that deals with behaviour that is developmentally inappropriate and may cause developmental damage.

Figure 1

Normal	Inappropriate	Problematic	Abusive	Violent
- Developmentally expected - Socially acceptable - Consensual, mutual, reciprocal - Shared decision-making	- Single instances of inappropriate sexual behaviour - Socially acceptable behaviour within peer group - Context for behaviour may be inappropriate - Generally consensual and reciprocal	- Problematic and concerning behaviour - Developmentally unusual and socially unexpected - No overt elements of victimisation - Consent issues may be unclear - May lack reciprocity or equal power - May include levels of compulsivity	- Victimising intent or outcome - Includes misuse of power - Coercion and force to ensure victim compliance - Intrusive - Informed consent lacking or not able to be freely given by victim - May include elements of expressive violence	- Physically violent se - Highly intrusive - Instrumental violenc psychologically and/c arousing to the perpe - Sadism

Source: Hackett, S, 'Children, young people and sexual violence' in 'Children behaving badly? Exploring peer violence between children and young people', 2010.

10. **Consent -** Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another, e.g.to vaginal but not anal sex or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity and each time activity occurs. Someone consents to vaginal, anal or oral penetration only if s/he agrees by choice to that penetration and has the freedom and capacity to make that choice.
    - A child under the age of 13 can never consent to any sexual activity
    - The age of consent is 16
    - Sexual intercourse without consent is rape.

Creating a culture of zero tolerance

11. **All** staff have a responsibility to challenge inappropriate sexual comments and actions whenever they observe them. This enables the college to foster a culture where students feel confident that whilst this behaviour may happen, swift action is taken to address it.

12. At induction all students will be made aware of our expectations, where firm ground rules are set and students understand what constitutes abuse and harassment and the actions that will be taken to address issues.

13. Visual displays in corridors and classrooms will highlight our zero tolerance approach and signpost students to where they can go to report a concern, which includes an online reporting mechanism.

14. Within our tutorial programme students will be provided information about healthy relationships, sexual violence, harassment and consent as well as wider advice and guidance on how to keep themselves safe.

15. A student is likely to disclose abuse to an adult that they trust and it is therefore important that all staff are aware that they may receive a disclosure from a student. **All** staff have a responsibility to report concerns to the safeguarding team, using our safeguarding procedures where they feel those concerns or issues are putting a young person at risk of harm, if in doubt staff should seek advice from the safeguarding team. It is important that the staff member receiving the initial disclosure reassures the student they have done the right thing in coming forward but should never promise confidentiality as it may well be in the best interests of the victim to share information with parents and report concerns to external agencies.

Responding to an allegation of sexual violence or harassment

16. The safeguarding team and in serious or complex cases the Senior DSL will take the lead in response to allegations of sexual violence or harassment.

17. It is important that victims are assured that they are being taken seriously and they will be supported and kept safe. Abuse that occurs outside of college should not be downplayed and be treated equally as seriously.

18. The safeguarding team will consider the wishes of the victim in terms of how they want to proceed. Victims will be given as much control as reasonably possible but this will be balanced against the college's legal duty to act to protect children and vulnerable adults.

19. The safeguarding team will be responsible for putting in place a risk assessment that considers the proximity of victim and alleged perpetrator and steps and safeguards that need to be taken to keep both parties separate from each other. Where there is an allegation of sexual violence (especially rape or assault by penetration) and both students share the same classes, immediate steps will be taken to remove the alleged perpetrator from the class and alternative arrangements made for them to continue with their studies. Risk assessments will be done using the template attached to this procedure and will be shared with the Senior DSL.

20. The safeguarding manager, with, if necessary advice from the Senior DSL, will make an assessment, in consultation with the victim, about whether a crime has been committed and therefore the allegation needs reporting to the police. If this is the case the victim will be supported to do so. If it is not clear whether a crime has been committed but allegations meet thresholds for social care intervention then a referral will be made to the relevant social care team for the student.

21. Consent would be sought prior to making the referral, however, for young people aged between 16-18 referrals can be made without consent, parents would usually be informed of allegations for young people aged 16-18. For allegations made for students over the age of 18 the college **would not** make referral or reports to external agencies without the consent of the individual.

22. The safeguarding team will make an assessment of when to inform the alleged perpetrator of the allegations. Where a report is going to be made to either the police or social care advice would be sought from the relevant agency and next steps considered and led by that agency. This does not stop the college taking steps to safeguard students (e.g. separating the victim from alleged perpetrator).

23. There are largely four routes through which the college may choose to manage allegations:

    - Internal investigation – where incidents are one-off, are relatively low-level and where no crime has been committed. Students are not in need of early help and no referral is necessary to external agencies. Outcomes of the investigation will be recorded and investigations conducted in line with a zero tolerance approach. Disciplinary sanction where necessary will be used.
    - Early help – this can link to the internal investigation and may include early help from within the college or more formally through an early help referral to social care. Decisions, discussions and reasons for decisions should be recorded.
    - Referral to children's social care – where a child has been harmed, is at risk of harm or is in immediate danger a referral should be made to children's social care. At the point of referral the college will work alongside the statutory agencies. Steps to minimise risk to student in college will still be taken by the college in liaison with social care with care taken that any measures put in place by the college do not jeopardise the investigation. The investigation will be led by social care with the support of the college. Details of reports, concerns will be logged by the safeguarding team.

- Reporting to the police – Any report to the police is likely to be in parallel to a report to social care and will be made when a crime has been committed. The team will consult with police and what information can be shared with staff and others. They will also discuss the best ways to protect the victim and their anonymity. The police will consider what action to take and this may be the imposition of bail conditions that limits the alleged perpetrator's access to the college. Consideration will need to be given as to how to enable the alleged perpetrator to continue with their studies.

24. When concerns are referred to external agencies the college will be led by them in terms of the information the alleged perpetrator is given of concerns raised. It is often the case that the police or social care want to take the lead in communicating with the perpetrator. In this case agencies will keep the college informed and advise on any additional measures that need to be put in place to protect the victim.

25. On conclusion of the investigation, even where statutory agencies report no further action, the college will consider what steps it needs to take to continue to support and protect the victim. Considerations will include what ongoing support they need to come to terms with what is likely to be a traumatic incident. Consideration should be given to the victim's wishes and a desire wherever possible to keep them in the college and learning.

26. The college will also consider what action needs to be taken to support the alleged perpetrator. Consideration should be given as to whether the perpetrator themselves could be a victim of abuse and what can and should be done to stop reoffending behaviour. It is likely that a risk assessment will remain in place, the safeguarding team will meet with the parents of the alleged perpetrator (for students under the age of 18) to explain the risk assessment and any measures that have been put in place.

27. If allegations are found to be malicious, unfounded or false the safeguarding team will consider whether the victim may need support, whether the allegation was a cry for help or where clear evidence exits that allegations were deliberately invented or malicious whether any disciplinary action needs to be taken.

28. Finally, the college will consider what support and action needs to be taken to protect and safeguard other students who may have witnessed incidents or may have been supporting either the victim or alleged perpetrator.

For further advice guidance

29. Please make contact with the safeguarding team.

Serious Sexual Violence and Sexual Harassment – Assessment of risk

Date risk assessment completed: **Name of student (victim):** **Student Reference number:** **Age:** **Other student involved:** **Student Reference number:** **Age:**	
Considerations	**Summary of considerations, risks and mitigations.**
The wishes of the victim. How do they want to proceed?	
What is the nature of the alleged incident – has a crime been committed and does it involve HSB?	
Developmental stages of the young people involved – are there any signs of developmental delay?	
Any power imbalances?	
Does either student have a disability or learning difficulty?	
Are victim or alleged perpetrator known to social care or have any other vulnerabilities?	
Is the incident one off or sustained abuse?	
Are the students in a relationship?	
Do the students study within the same area or classroom – how easy is it to keep students separate?	
Are external agencies or the police involved?	

Are there any bail conditions that impact on the college's decision making?	
Are there ongoing risks to the victim and potentially other college students?	
Links to CCE or CSE?	
Links to intra-familial harm – any support needed for siblings at the college as a result of the incident?	
Other considerations	

Summary of key risks and any mitigating factors:

College actions – to be reviewed on:

Appendix 3

Online Safety Policy 2025-2026

Introduction

1. West Nottinghamshire College recognises the opportunities that technology offers to teaching, learning, engagement and communication. Our technology enhanced learning and digital strategy (TELD) sets out our ambition to fully utilise the potential of technology to enhance skills and promote achievement.

2. However, the accessible and global nature of the internet and the variety of technologies available mean that we are also aware of potential risks and challenges associated with such use. Our approach is to implement safeguards within the College and to support staff and learners to identify and manage risks independently. We believe this can be achieved through a combination of security measures, training and guidance and the implementation of our associated policies. Our online safety policy extends to the use of generative AI and other emerging technologies.

3. Our duties enshrined within keeping children safe in education require us to do all we can to ensure that our students stay safe online and further, ensure they are equipped with an understanding of risk, resilience and personal strategies to keep themselves safe online.

4. Our online safety policy should be read in conjunction with the following policies, procedures and guidance notes: safeguarding policy and procedure; bullying and harassment policy (students); IT acceptable use policy; positive behaviour management pack and student code of conduct; email etiquette guidance (staff); staff code of conduct; and staff social media policy.

Scope

5. This policy covers:

    - Anyone logging into any network, service, website or portal associated with West Nottinghamshire College.
    - Connecting a device via the West Nottinghamshire College network.
    - Any electronic communication with a West Nottinghamshire College student, member of Staff or contractor.
    - From any geographic location both on Campus and off Campus.

Definitions

6. In setting out the definitions related to online safety the college uses the 4 Cs outlines within keeping children safe in education which have been incorporated into the college's safeguarding processes and procedures:

    - Content – being exposed to illegal, inappropriate or harmful content for example pornography, , racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism, misinformation, disinformation (including fake news) and conspiracy theories;
    - Contact – being subjected to harmful online contact and interaction with other users, for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom and exploit them for sexual, criminal, financial and other purposes;
    - Conduct – online behaviour that increases the likelihood of harm for example, making and sharing of nudes/semi-nudes, pornography, sharing explicit images and cyber bullying; and
    - Commerce – educating students to the range of online risks including gambling, inappropriate advertising, phishing and scams.

Responsibilities

7. **All staff** are responsible for ensuring the safety of students online and for ensuring their own conduct is appropriate and does not put students at risk of harm.

8. **All staff** are responsible for reporting any concerns about students to the safeguarding team in line with the college's procedures;

9. **The designated safeguarding lead** is responsible for ensuring that appropriate training is provided to all staff in relation to online safety and that appropriate action is taken to safeguard students when concerns arise;

10. **The vice principal curriculum and quality** is responsible, through the tutorial programme for ensuring students have appropriate and meaningful training around online safety;

11. **The director of IT, estates and learning resources** is responsible for ensuring appropriate and effective filtering and monitoring systems are in place;

12. **Governors** are responsible for ensuring that appropriate measures are in place and are effective in keeping students and staff safe online; and

13. **All students** are responsible for ensuring their own conduct does not put others at risk or harm and for reporting any concerns they may have about online safety.

Monitoring

14. West Nottinghamshire College actively monitor, log and report on students and staff use of IT systems and IT network usage as part of our safeguarding and prevent duties. This

includes the use of filtering systems and the use of Smoothwall to monitor activity on college devices.

15. An attempt to interfere or avoid the monitoring or logging of any IT systems will be referred to the college's disciplinary process. Where requested this information will be securely shared with appropriate local authorities and external support agencies.

Training

16. Students will be provided with online safety guidance at induction by personal tutors, this includes the proper use of college systems. Tutorial planning will include appropriate and relevant online guidance for students. Tutorials will also ensure students consider their digital footprint in both a personal and professional context.

17. Issues associated with online safety apply across the curriculum and students should receive guidance on what precautions and safeguards are appropriate when making use of the internet and mobile technologies. Students should also know what to do and who to talk to where they have concerns about inappropriate content, either where that material is directed to them, or where it is discovered as part of a random search. Within classes, students will be encouraged to question the validity and reliability of materials researched, viewed or downloaded. They will also be encouraged to respect the copyright of other parties and to cite references properly.

18. Staff will receive an introductory session for digital learning/working systems and environments within the induction period. This introductory session will signpost appropriate policies and procedures. Any new or temporary users will also be asked to sign the college's IT acceptable use policy.

Behaviour

19. Communications by staff and learners should be courteous and respectful at all times whether offline or online. Any reported incident of bullying or harassment or other unacceptable conduct will be treated seriously and in line with the Anti-Bullying and Harassment processes (staff and students).

20. Cyber bullying is a form of bullying. As it takes place online, it is not confined to college buildings or college hours. Cyber bullies can communicate their messages to a wide audience with speed and often remain anonymous or unidentifiable.

21. Cyber bullying includes bullying via:

    - Text message and messaging apps e.g. sending unwelcome texts or messages that are threatening or cause distress.
    - Picture/video-clips e.g. using mobile device cameras to bully someone, with images usually sent to other people, social media sites/apps or websites.
    - Phone call e.g. silent calls or abusive messages. The bully often disguises their number.

- Email e.g. emailing upsetting messages, often using a different name for anonymity or using someone else's name to deflect the blame on them.
- Chat room e.g. sending upsetting responses to people when they are in a web-based chat room.
- Instant Messaging (IM) e.g. sending unpleasant messages in real-time conversations online.
- Websites e.g. insulting blogs, personal websites, social networking sites and online personal polling sites.

22. Where conduct is found to be unacceptable, the College will deal with the matter internally and refer to relevant policies such as the staff and student code of conduct and disciplinary procedures. Where conduct is considered illegal, the college will report the matter to the police

Online Communication

23. The bullet points below offer some guidance for both students and staff in their online communications:

- Do not create, store, exchange, display, print or circulate any message or media which may cause offense to others.
- Do not post or circulate any message which may be considered harassment
- Do not send messages at random or excessively, also referred to as "spamming", consider carefully the reply all function in email.
- Staff should not use personal social media accounts as a method of communicating with students.
- Staff should not give personal contact details to students.
- Student contact details must never be stored on a staff members' personal device(s), including computers, laptops, mobile phones, tablets, personal cloud or personal storage devices.
- College devices may, on occasion, be used to gather either video or photographic evidence in order to support students' course requirements provided that the college hold a signed authorisation form for the student in question.
- Do not give out log on details and passwords to anyone, the college will never ask you to disclose your password.
- Do not open files or emails from people you do not know. They may contain viruses or offensive material.
- If you see something abusive or upsetting online, you report it to a member of staff and/or the safeguarding team.
- Do not save your log-on details on shared computers as some people may use your name to cause harm to others.
- Make sure that your computer is locked when not in use so that others cannot act inappropriately using your profile.
- Do not post any confidential information to any online platform.
- Students should not send friend requests to members of staff, they are unable to accept them. Similarly staff should not seek to add students as friends on their personal social media accounts. Social media presences established in the interests

of teaching and learning must be established in line with the college's social media policy.

Feedback and review

24. Staff and students are actively encouraged to review and feedback on this policy document. This is a working document and as such changes can be made throughout the year, the policy will be formally reviewed on an annual basis.

Appendix 4

Responding to concerns about staff

Guidance and procedures

Introduction

The college sets out it expectations related to staff behaviour within its code of conduct. This includes all colleagues' responsibility for creating a safe, secure and trusting environment for our students where safeguarding is an integral part of our culture. This culture takes account of our responsibilities under Keeping Children Safe in Education (KCSiE). Our safeguarding procedures and employee code of conduct ensure that colleagues behave in a way that maintains public confidence in their ability to safeguard the welfare and best interests of our students.

Our role as a member of staff

As a college with students under the age of 18, all staff at the college are deemed to be in a 'position of trust'. It is a criminal offence for anyone in a position of trust to engage in a sexual relationship or grooming for such a relationship with a child under the age of 18. Concerns about the abuse of a position of trust should be reported immediately to the senior designated safeguarding lead (DSL), Louise Knott, who will seek advice from the Local Authority Designated Officer (LADO). Such instances are likely to be managed through local authority managing allegations processes and reported to the police.

Whilst concerns about inappropriate relationships with students over the age of 18 may not trigger a referral to the LADO or police, they will still be fully investigated by the college and may result in disciplinary proceedings. If founded, the college would deem such relationships to be gross misconduct.

Concerns that meet the harm threshold

Keeping children safe in education outlines instances where concerns about colleagues would meet the harm threshold, these concerns are where colleagues have:

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

For the avoidance of doubt a child is defined as anyone under the age of 18.

The last bullet point includes behaviour that may have happened outside of college that might make an individual unsuitable to work with children, this is known as transferable risk.

In all cases where the DSL judges that a concern about a staff member meets the harm threshold, issues will be escalated to the LADO. Next steps both in terms of escalation to the managing allegations process or any investigation by the college will be guided by the LADO and may result in the college invoking its disciplinary processes. Where allegations are substantiated this may result in dismissal and referral to the DBS service. It is worth noting that a substantiated allegation through the managing allegations process does not automatically result in dismissal, the college through its own investigation, would consider risk and how such risk can be mitigated to enable it to discharge its duty to keep children safe. In all cases where concerns have been substantiated through the managing allegations process, the DSL will act as investigating manager within the college's disciplinary processes.

Concerns related to the DSL should be escalated to the clerk to the corporation who will refer to the LADO, however, colleagues can make contact with the LADO directly.

Low level concerns

The college encourages and promotes a culture whereby staff feel enabled to report concerns about a colleague's conduct and have confidence that those concerns will be taken seriously. All concerns whether or not they meet the harm threshold will therefore be recorded to enable the college to build a picture of suitability over time.

Low level concerns are those that do not meet the harm threshold. It does not mean that these concerns are not significant, a low level concern is any concern, no matter how small, and even if no more than a 'nagging doubt', that an adult working on behalf of the college may have acted in a way that is inconsistent with the staff code of conduct, examples can include but are not limited to:

- Being over friendly with young people;
- Having favourites;
- Taking photographs of young people on their personal mobile phones;
- Engaging with a young person on a 1:1 basis, behind closed doors or in a secluded area; and/or
- Using inappropriate, intimidating, offensive or overly sexualised language.

Such behaviour exists on a spectrum from inadvertent/thoughtless or behaviour that may look to be inappropriate but may not be in the specific circumstances through to what is ultimately intended to enable abuse. It is important therefore that concerns are shared with the DSL who will make a judgement about seriousness and where necessary seek advice from the LADO. Concerns raised about contractors and supply staff will be shared with the individual's employer and may be escalated to the LADO.

Low level concerns will be recorded in a confidential spreadsheet by the HR team. Where necessary appropriate advice and guidance will be given to staff members in respect of how they behaviour may be interpreted by others and support offered to enable colleagues to perform their duties in line with the college's code of conduct. The advice given and by whom will be recorded confidentially.

Low level concerns will be reviewed on a half-termly basis by the DSL and the Head of HR and reported to the principal. This enables the DSL and HR team to identify concerning patterns of behaviour which may need to be escalated through college disciplinary processes or escalated to the LADO. This action will be recorded.

Low level concerns will not be referred to in references unless they have been escalated through formal disciplinary procedures or escalated to the LADO.

Whenever staff leave the college, consideration will be given as to whether or not that information needs to be kept. In making this consideration the college will make a judgement about whether any or all of the information contained may have any reasonable value in terms of historic employment or abuse claims. Where this is not the case records will be destroyed/deleted.

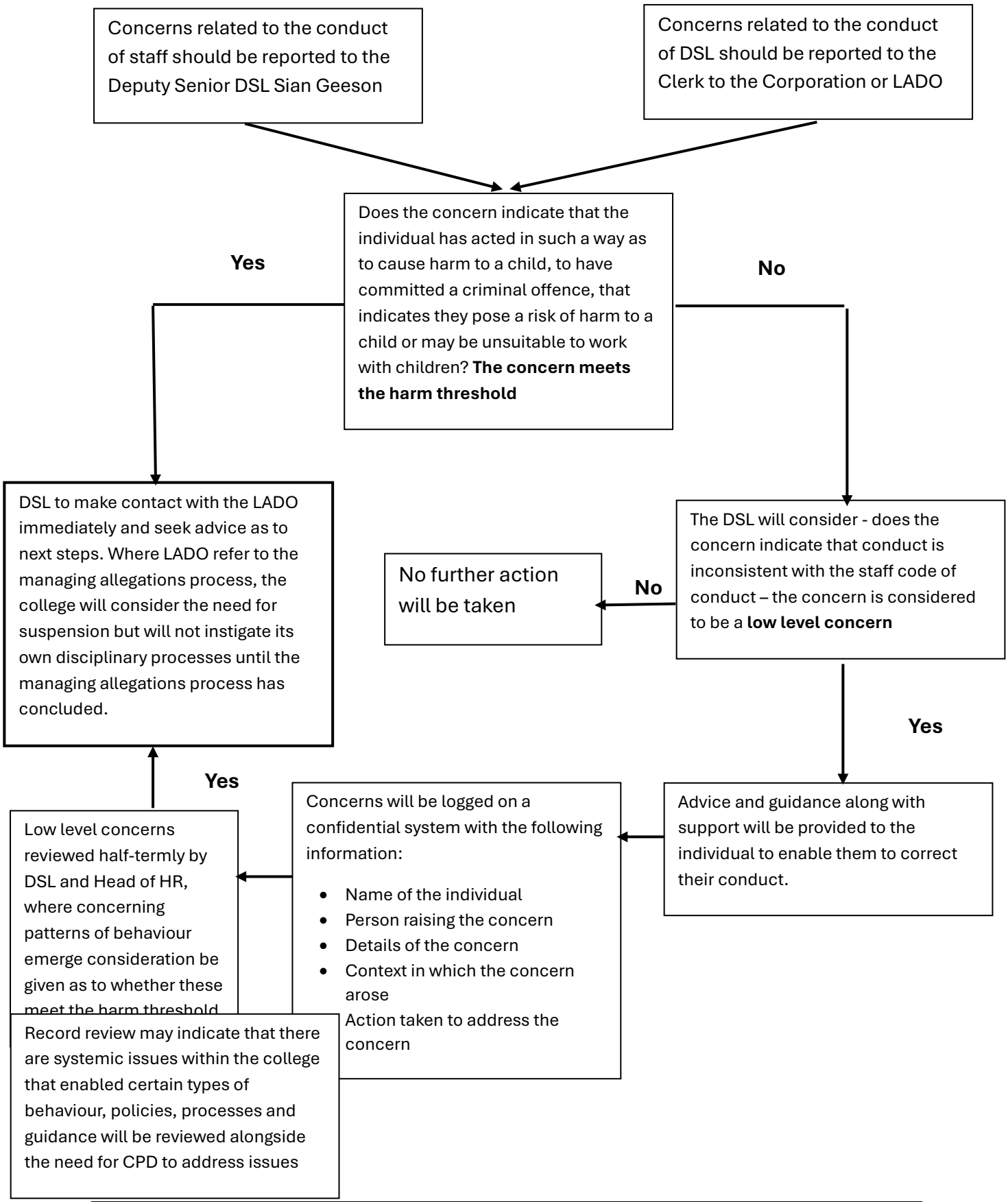
Legitimate relationships with students

The college recognises that due to the age group of students colleagues may have legitimate relationships with students (e.g. parent, friend, partner, and spouse). Such relationships should be logged with HR in the interests of protecting the individual from unfounded allegations.

Further information and guidance

Can be sought from the senior DSL or the HR team. Staff should refer to the employee code of conduct, safeguarding procedures and Keeping Children Safe in Education for further information.

Flowchart for managing concerns about staff.



Appendix 5

Neglect, physical abuse, sexual abuse and emotional abuse.

Physical Abuse

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

May be recognised by: Children with frequent injuries, injury such as bruising, bite marks, burns and scalds, fractures but also by aggressive behaviour. It may also be an indicator of concern where a parent gives an explanation inconsistent with the injury or gives several different explanations for the injury.

Emotional Abuse

The persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another, for example, domestic abuse. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

This may be recognised by: aggressive behaviour, appeasing behaviour, watchfulness or stillness, low self-esteem, withdrawn or a loner, or having difficulty in forming relationships. Emotional abuse may be difficult to recognise as signs are usually behavioural rather than physical. Signs of emotional abuse may be associated or similar to other forms of abuse so presence of emotional abuse may indicate other abuse is prevalent as well.

Sexual Abuse

Involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

This may be recognised by: Inappropriate sexualised conduct, age inappropriate sexualised play or conversation, sexually harmful behaviour – contact or non-contact, self-harm, eating disorders, continual, inappropriate or excessive masturbation, anxiousness or unwillingness to remove clothes – sports / PE etc., pain or itching in genital area, blood on underclothes, bruising in genital region and / or inner thighs etc.

Neglect

The persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may 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); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

This may be recognised by: Being constantly hungry; constantly tired; have a poor state of clothing; be emaciated; have untreated medical problems; be frequently late or have poor or non-attendance at college; have low self esteem; display neurotic behaviour and/or have poor social relationships, have poor personal hygiene. A neglected child may also be apathetic, fail to thrive, or be left with or in the care of adults under the influence of alcohol or drug misuse

Children with Special Educational Needs

Children with special educational needs (SEN) and or disabilities can face additional safeguarding challenges. Children with SEN and or disabilities are especially vulnerable when identifying concerns due to their impaired capacity to resist or avoid abuse. They may have speech, language and communication needs which may make it difficult to tell others what is happening. They may also sometimes not be believed because of their special educational needs or disabilities. We can never allow this to happen.

Additional barriers can therefore exist when recognising abuse and neglect in this group of children which include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration;
- children with SEN and disabilities can be disproportionally impacted by things like bullying- without outwardly showing any signs.
- Communication barriers and difficulties in overcoming these barriers.

Racist, disability, homophobic, biphobic or transphobic abuse

Abuse of any form on the basis of any of these will not be tolerated; staff and volunteers need to be alert to link between differing types of abuse and behaviours, for example racism and extremist behaviour, particular in our region.

Staff need to be aware of what they need to do if they are concerned this is happening (ie complete a part one form) and what support will need to be put in place.