

Safeguarding and Child Protection Policy and Procedures

Developed to conform to: Keeping Children Safe in Education (KCSIE), effective from October 2023

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Primary person responsible for implementation and monitoring of this policy	Andy Lovatt, CEO. Digital Advantage.
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Governor	Diane Ainsworth, Chair of Governors

DISC welcomes interns with special educational needs and disabilities (SEND) and will do all that is reasonable to ensure that the college’s curriculum, ethos, culture, policies, procedures, and premises are made accessible to everyone.

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Key College Contacts

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Head of College/DSL

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Tel. No. 07702 230318

DDSLs:

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Fran Hilton
Kirsty Bradley Law
Clare O'Toole
Lizzie Northcote-Smith

Nominated Safeguarding Governor

Diane Ainsworth
dainsworth64@gmail.com

Key External Contacts

Designated Officer of Local Authority

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Manchester Town Hall
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Manchester M60 2LA
quality.assurance@manchester.gov.uk
Tel. No. 0161 234 1214

**Manchester Children's Social
Care Department**

Manchester Children's Services
102 Manchester Road
Chorlton
Manchester
Tel. No. 0161 234 5001
Out of Hours Tel. No. 0161 234 5001
mscreply@manchester.co.uk

Manchester Safeguarding Partnership

Manchester Safeguarding Partnership
Floor 4, Town Hall Extension
Albert Square, PO Box 532
Manchester M60 2LA

Tel. No. 0161 234 3330 / 0161 234 1505
manchestersafeguardingpartnership@
manchester.gov.uk

FGM Reporting

NSPCC FGM helpline Tel. No. 0800 028 3550
fgmhelp@nspcc.org.uk

Police

Emergency Contact No: 999
Non-Emergency contact no: 101 (use this no. to
report suspected FGM)

Prevent partners and advice about extremism

Channel Police Practitioner
Name: Samiya Butt
Tel. No. 020 7340 7264
Email: S.butt@manchester.gov.uk
Non-emergency DfE advice: 020 7340 7264
counter-extremism@education.gsi.gov.uk
NSPCC advice: 0808 800 5000
help@nspcc.org.uk

UK Safer Internet Centre Online Safety

Tel. No. 0344 381 4772 (10am – 4pm)
helpline@saferinternet.org.uk

NSPCC Advice Whistleblowing Helpline

Telephone: 0800 028 0285
Email: help@nspcc.org.uk
<https://www.nspcc.org.uk/what-is-child-abuse/types-of-abuse/>

Report Abuse in Education helpline

0800 136 663 or email help@nspcc.org.uk
A dedicated helpline for children and young people who have experienced abuse at college,
and for worried adults and professionals that need support and guidance, including for
non-recent abuse.

Disclosure & Barring Service (DBS)

Helpline: 03000 200190
Barring referrals: dbsdspatch@db.gov.uk

Bolton children Partnership

Bolton Safeguarding Children Partnership
Westhoughton Town Hall
Market Street
Westhoughton BL5 3AW
Tel. No: 01204 337479
boltonsafeguardingchildren@bolton.gov.uk

**Bury Integrated
Safeguarding Partnership**

18-20 St Mary's Place
Bury, BL9 0DZ
Phone: Bury Multi-Agency Safeguarding Hub
(MASH) Team on 0161-253-5678 or outside of
office hours the Emergency Duty Team on
0161- 253-6606

Email: childwellbeing@bury.gcsx.gov.uk

**Rochdale Borough Safeguarding
Children's Partnership (RBSCP)**

RBSCP
Floor 4, Number One Riverside Smith Street
Rochdale OL16 1XU
Tel: 0300 303 0350
rbsb.admin@rochdale.gov.uk

**Salford Safeguarding Children
Partnership**

Sutherland House
303 Chorley Road, Swinton
M27 6AY
Email: sscp@salford.gov.uk

Phone: Bridge Partnership
0161 603 4500
(Monday to Friday from 8:30am - 4:30pm)
Emergency Duty Team (EDT) - 0161 794 8888

**Stockport Safeguarding Children
Partnership**

Sanderling Building, Birdhall Lane
Cheadle Heath, Stockport SK3 0RF
Phone: 0161 217 6028
Out of Hours Phone: 0161 718 2118
<https://www.stockport.gov.uk/contacting-the-massh>

**Tameside Safeguarding Children
Partnership**

Phone: 0161 342 4101 (Mon-Friday office hours)
0161 342 2222 (outside office hours, weekends
& public holidays)
<https://www.tameside.gov.uk/childabuse>

**Trafford Strategic
Safeguarding Partnership**

Trafford Council
Trafford Town hall Talbot Road Stretford
M32 0TH
Safeguarding Manager: Sophie Triantafillou
Email: Sophie.Triantafillou@trafford.gov.uk
Tel: 0161 912 2089
Safeguarding Support Officer – Morgan Adams
Email: morgan.adams@trafford.gov.uk
Tel: 0161 911 8687
Fax: 0161 912 3424

1. Aims

1.1 This is the safeguarding and child protection policy and procedures of DISC Manchester.

1.2 The aims of this policy are as follows:

- a. to actively promote the well-being of interns;
- b. to safeguard and promote the welfare of interns, staff and others who come into contact with the college and to protect them from harm;
- c. to have clear procedures in place for dealing with and referring to concerns about the welfare of any individual and / or allegations of abuse, neglect and / or exploitation.
- d. to raise awareness about how to report concerns and how they will be investigated whether they are current or historic in nature;
- e. to raise staff awareness about the college 's safeguarding expectations.
- f. to ensure staff are competent to carry out their safeguarding responsibilities and feel supported in this role;
- g. to ensure consistent good safeguarding practice throughout the college, to include the promotion of a zero-tolerance approach to child-on-child sexual violence and harassment in which interns are confident to report it and staff are confident to identify and respond to it;
- h. to promote a whole college culture of safety, equality, and protection.
- i. to ensure the college works together effectively with parents, local authorities, partner organisations and agencies.

1.3 Every intern should feel safe and protected from any form of abuse and neglect.

1.4 All staff should understand the indicators of abuse and neglect and specific

safeguarding risks so that they can identify them and report any concerns. The indicators and key safeguarding risks for the college community are set out in [Appendix 1](#).

- 1.5 Members of the college community (including alumni) should also feel able to raise any safeguarding concerns, whether current or non-recent, safe in the knowledge that they will be supported, the matter will be handled sensitively and appropriate action taken.
- 1.6 Anyone about whom a concern is raised should feel confident that they will be supported, and the matter will be handled sensitively, and that appropriate action will be taken.
- 1.7 This policy forms part of the college's whole college approach to promoting intern safeguarding and wellbeing, which seeks to involve everyone at the college to ensure that the best interests of interns underpins and is at the heart of all decisions, systems, processes, and policies.
- 1.8 Although this policy is necessarily detailed, it is important to the college that our safeguarding policies and procedures are transparent, clear and easy to understand for staff, interns, parents and carers. The college welcomes feedback on how we can continue to improve our policies.

2. Scope and application

- 2.1 This policy applies to the whole college.
- 2.2 This policy always applies including where interns or staff are away from the college, whether they are on college -arranged activities or otherwise, and whether or not the college is open. It will therefore apply out of college hours and in the holidays.
- 2.3 This policy applies to core college activities and to out of hours and commercial activities run by the college. Where a third party is using the premises, the college will ensure that there is a written agreement in place confirming they have adequate safeguarding procedures.
- 2.4 This policy is designed to address the specific statutory obligations on the college to safeguard and promote the welfare of children and young people.
- 2.5 A child is someone who has not yet reached their 18th birthday, but in practice this policy applies to all young people studying within DISC.

3. Regulatory framework

3.1 This policy has been prepared to meet the college 's responsibilities under the following legislation:

- a. The Education (Independent college Standards) Regulations 2014;
- b. Education and Skills Act 2008;
- c. Children Act 1989.
- d. Children Act 2004.
- e. Childcare Act 2006.
- f. Safeguarding Vulnerable Groups Act 2006.

- g. Children and Social Work Act 2017
- h. Data Protection Act 2018 and UK General Data Protection Regulation (UK GDPR)
- i. Human Rights Act 1998; and
- j. Equality Act 2010.

3.2 This policy has regard to the following guidance and advice:

3.2.1 Statutory Guidance

- a. [Keeping children safe in education](#) (DfE, September 2023) (KCSIE);
- b. [Working together to safeguard children 2018](#) (HM Government, updated July 2022)
- c. [Revised Prevent duty guidance for England and Wales](#) (HM Government, April 2021);
- d. [Multi-agency statutory guidance on female genital mutilation](#) (HM Government, July 2020);
- e. [Children missing education](#) (DfE, September 2016);
- f. [Relationships education, relationships and sex education and health education guidance](#) (DfE, September 2021);
- g. [Channel duty guidance: protecting vulnerable people from being drawn into terrorism](#) (HM Government, February 2021);
- h. PACE Code C 2019

3.2.2 Non-Statutory Guidance

- a. [What to do if you're worried a child is being abused: advice for practitioners](#) (HM Government, March 2015);
- b. [Information sharing: advice for practitioners providing safeguarding services to children, young people, parents and carers](#) (HM Government, July 2018);
- c. [Behaviour in schools: advice for headteachers and college staff \(DfE, September 2022\)](#);
- d. [Working together to improve college attendance](#) (DfE, September 2022);
- e. [Sharing nudes and semi-nudes: advice for education settings working with children and young people](#) (DCMS and UKCIS, December 2020)
- f. [Searching, screening and confiscation: advice for colleges](#) (DfE, September 2022);
- g. [Teaching online safety in colleges](#) (DfE, June 2019);
- h. [Virginity testing and hymenoplasty: multi-agency guidance \(DHSC, July 2022\)](#);
- i. [Harmful online challenges and online hoaxes](#) (DfE, February 2021);
- j. [Child sexual exploitation: definition and a guide for practitioners local leaders and decision makers working to protect children from child sexual exploitation](#) (DfE, February 2017);
- k. [Educate Against Hate](#) (HM Government 2018);
- l. Equality Act 2010: advice for colleges (DfE, June 2018)

3.2.3 Manchester Safeguarding Children Partnership's referral / threshold procedures / guidance www.manchestersafeguardingpartnership.co.uk

3.3 The following college policies, procedures and resource materials are relevant to this policy:

1. Staff Conduct Policy
2. Behaviour, Discipline and Exclusion Policy
3. Anti-Bullying Policy which includes cyber-bullying
4. Acceptable Use Policy for Staff; Staff IT Acceptable Use Policy
5. Acceptable Use Policy for interns; IT Usage Policy

6. Health and Safety Plan
7. Online Safety Policy
8. Social Media Policy
9. Whistleblowing Policy
10. Recruitment Policy
11. Risk Assessment Policy
12. Child Supervision and Missing Child Policy
13. Special Educational Needs and Disability (SEND) Policy
14. Remote Working Policy
15. Sex and Relationship Education (SRE) Policy

4. Publication and availability

- 4.1 This policy is published on the college website and a hard copy is available on request.
- 4.2 A copy of the policy is available for inspection from Reception during the college day.
- 4.3 This policy can be made available in large print or another accessible format if required.

5. Definition

- 5.1 Where the following words or phrases are used in this policy:
 - 5.1.1. References to the Board of Governors or the Chair of Governors.
 - 5.1.2. References to Digital Advantage means the advisory council to the Board.
 - 5.1.3. References to the Digital Advantage means the proprietor.
 - 5.1.4. References to working days mean Monday to Friday when the college is open during term time. The dates of terms are published on the college website. If referrals to an external agency are required outside term time, references to working days are to the days on which the relevant external agency is working.

- 5.1.5. Safeguarding is the protection of people from harm.
- 5.1.6. Safeguarding and promoting the welfare of children is defined in WTSC and KCSIE as:
- a. protecting children from maltreatment.
 - a. Preventing impairment of children's mental and physical health or development.
 - b. Ensuring that the young people grow up in circumstances consistent with the provision of safe and effective care; and
 - c. Taking action to enable all young people to have the best outcomes.
- 5.1.7 Abuse is defined by KCSIE as a form of maltreatment of a child. Detailed descriptions of the categories of abuse and risk indicators to help staff to recognise them are included in Appendix 1.
- 5.1.8 CSC means Children's Social Care and includes, depending on the context, the team based in the local authority where the college is located and, where appropriate, the team based in the local authority where the child is resident.
- 5.1.9 DSL means the college 's Designated Safeguarding Lead. References to the DSL include the Deputy DSL (DDSL) where the DSL is unavailable.
- 5.1.10 Designated Officer means designated officer at the local authority (often referred to as the LADO). The designated officer(s) has overall responsibility for oversight of the procedures for dealing with allegations, for resolving any inter-agency issues, and for liaison with the three safeguarding partners.
- 5.1.11 Local Safeguarding Partners means the three safeguarding partners (local authority, Integrated Care Systems' (ICSs) and the chief officer of police for an area any part of which falls within the local authority area) who decide to work together with appropriate relevant agencies to safeguard and promote the welfare of local children, including identifying and responding to their needs. The local arrangements relevant to the college can be found in Appendix 5.
- 5.1.12 References to harmful sexual behaviour in this policy refer to problematic, abusive, and violent sexual behaviours expressed by children and young people under the age of 18 years old that are developmentally inappropriate and may cause developmental damage, may be harmful towards self or others, or abusive towards another child, young person or adult.
- 5.1.13 Reference to staff includes all those who work for or on behalf of the college, regardless of their employment status, including part-time staff, contractors, supply staff, volunteers and Governors unless otherwise indicated.

5.1.14 Senior Leadership Team (SLT) comprises the Head of College, Managing Director & CEO.

6. Responsibility statement and allocation of tasks: the college's approach to safeguarding leadership

6.1 Governance

- 6.1.1 Disc has overall responsibility for all matters which are the subject of this policy, including:
- a. Legal responsibility to ensure that arrangements are made to safeguard and promote the welfare of interns at the college.
 - b. Strategic leadership responsibility for the college's safeguarding arrangements.
 - c. Specific responsibilities to facilitate a whole college approach to safeguarding, set out in more detail in Part 2 of KCSIE; and
 - d. Establishing appropriate delegation arrangements at college level, led by the Head and DSL, to enable the college to discharge its safeguarding duties effectively.

6.1.2 Details of the DISC Governors can be found on the website (disc.ac.uk).

DISC

- a. Ensures that all Governors receive appropriate safeguarding and child protection (including online) training, both on induction and thereafter regularly updated. Training should be consistent with KCSIE and Local Safeguarding Partner guidance.
 - b. Ensures it discharges its legal responsibilities under the Human Rights Act 1998 and the Equality Act 2010, having regard for the implications for safeguarding that such responsibilities can have; and
 - c. Ensures that appropriate arrangements are in place for the whole Board to discharge its function, including appropriate consideration of safeguarding matters at Board meetings and a holistic annual review of safeguarding.
- 6.1.3 DISC has appointed a Nominated Safeguarding Lead Governor, Diane Ainsworth, whose contact details are set out in the college contacts list at the front of this policy.
- 6.1.4 The Nominated Safeguarding Governor receives advanced safeguarding training, which is regularly updated. Governors receive regular updates as required and through a quarterly Board report on safeguarding.
- 6.1.5 Safeguarding and the implementation of policies and procedures is monitored at the college through an annual cycle of governance visits. Each year the Nominated Safeguarding Governor holds an annual in-depth review with the DSL, looking at:
- a. Training
 - b. Child protection issues and safeguarding concerns raised in the last academic year.

- c. Incidents of bullying.
- d. Online safety incidents.
- e. Feedback from interns' reviews.
- f. The effectiveness of multi-agency working and
- g. Lessons learned

6.1.6 The Nominated Safeguarding Governor ensures safeguarding policies and procedures are kept up to date with the law and best practice, including a formal annual review.

6.2 Head of College

6.2.1 The Head is responsible for the overall management of the college and for the management of concerns and allegations about staff.

6.2.2 The Head ensures that the college's policies and procedures, adopted by the Governing Body (particularly those concerning referrals of cases of suspected abuse and neglect), are understood, and followed by all staff.

6.3 Designated Safeguarding Lead (DSL)

6.3.1 The DSL is a senior member of staff of the college's leadership team with necessary status and authority to take lead responsibility for all aspects of safeguarding and child protection (including online safety) throughout the college.

6.3.2 The DSL has the appropriate status and authority within the college to carry out the duties of the post, and the time, funding, training, resources and support to enable them to provide advice and support to other staff on child welfare and child protection matters, to take part in strategy discussions and inter-agency meetings (and / or to support other staff to do so) and to contribute to the assessment of young people. The name and contact details of the DSL are set out in the college contacts list at the front of this policy. The main responsibilities of the DSL are set out in Annex C of KCSIE.

6.3.3 The DSL will also liaise with the Chief Operating Officer to inform them of issues relating to any police investigations and the statutory requirements for children or young people to have an appropriate adult. The role of the appropriate adult is to safeguard the rights, entitlements, welfare of juveniles/vulnerable young people to whom the provisions of PACE code C and any other code of practice apply.

6.3.4 The DSL will take lead responsibility for interns who are looked after children.

6.3.5 An appointed member of staff - Kirsty Bradley-Law, with assistance from the DSL will undertake the role of senior mental health lead and is responsible for developing a holistic approach to promoting and supporting the mental wellbeing of interns and staff.

6.3.6 If the DSL is unavailable the activities of the DSL will be carried out by the Deputy DSLs, who are trained to the same level as the DSL. The Deputy DSLs' details are also set out in the college contacts list at the front of this policy.

7. Specific safeguarding duties in relation to children and young people

- 7.1 Safeguarding and promoting the welfare of children and young people is everyone's responsibility. Staff should speak with their DSL if they need clarification or further training about any of the contents or procedures outlined in this policy.
- 7.2 The college is committed to acting in the best interests of the young person to safeguard and promote the welfare of children and young people. The college requires everyone who encounters children, young people, and their families to share this commitment.
- 7.2.1 understand its role in the safeguarding partner arrangements www.manchestersafeguardingpartnership.co.uk and operate safeguarding procedures in line with locally agreed multi-agency safeguarding arrangements put in place by the Manchester Safeguarding Children Partnership, the key details of which are contained in Appendix 5;
- 7.2.2 be alert to signs of abuse whether in college, within the intern's family or from outside, and take steps to protect individuals from any form of abuse, or neglect whether from an adult or another child;
- 7.2.3 include opportunities within the curriculum for interns to develop the skills they need to recognise, and stay safe from abuse.
- 7.2.4 promote the systems in place for young people to confidently report abuse, ensuring they know their concerns will be treated seriously, they can safely express their views and give feedback.
- 7.2.5 take active steps to promote college attendance:
- 7.2.6 allow staff to determine how best to build trusted relationships with interns which facilitate communication within the parameters of the staff code of conduct.
- 7.2.7 deal appropriately with every suspicion or complaint of abuse and support young people who have been abused in accordance with appropriate education, child protection and / or welfare plans.
- 7.2.8 design and operate procedures which, so far as possible, ensure that staff, interns and others who are innocent are not prejudiced by malicious, false, unsubstantiated or unfounded allegations.
- 7.2.9 prepare staff to identify and support young people who may benefit from early help and encourage them to be particularly alert to the potential need for early help for young people with the indicators listed in KCSIE or WTSC.
- 7.2.10 be alert to young people who are at potentially greater risk of harm including young people who need a social worker and young people requiring mental health support.
- 7.2.11 be alert to the needs of interns with physical or mental health conditions, special educational needs or disabilities, which could be an indicator that a young person has suffered or is at risk of suffering

abuse, neglect or exploitation, and where additional barriers can exist when detecting abuse or neglect.

- 7.2.12 encourage a culture of listening to interns and victims of abuse and taking account of their wishes and feelings in any measure put in place and actions taken by the college to protect them, for example through the review process.
 - 7.2.13 operate robust and sensible health and safety procedures and operate clear and supportive policies on drugs, alcohol and substance misuse.
 - 7.2.13 assess the risk of interns being drawn into terrorism, including support for extremist ideas that are part of terrorist ideology, based on an understanding of the potential risk in the local area.
 - 7.2.14 identify interns who may be vulnerable to radicalisation and know what to do when they are identified; and
 - 7.2.15 consider and develop procedures to deal with any other safeguarding issues which may be specific to individual interns in the college or in the local area. See Appendix 5 - Local arrangements for more details.
- 7.3 Staff may follow the college 's whistleblowing policy to raise concerns about poor or unsafe safeguarding practices at the college or potential failures by the college or its staff to properly fulfil its safeguarding responsibilities. Such concerns will be taken seriously. The NSPCC whistleblowing helpline is available for staff who do not feel able to raise concerns about child protection failures internally (see the front of this policy for the relevant contact details). Staff may also report concerns direct to the college 's Local Authority if they consider that the college has failed to deal with concerns appropriately.

8.Reporting obligations of staff

8.1 Reporting obligations generally

- 8.1.1 Staff members should be vigilant and maintain an attitude of "it could happen here" where safeguarding is concerned. When concerned about the welfare of an intern, staff members should always act in the best interests of the intern.
- 8.1.2 Staff should be aware that interns may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful e.g., a young person may feel embarrassed, humiliated, or being threatened due to their vulnerability, disability and/or sexual orientation or language barrier. Exercising professional curiosity and knowing what to look for is vital for the early identification of abuse and neglect so that staff can identify cases of young people who may need help or protection.
- 8.1.3 All staff have a duty to:

- a. report any concerns they may have about the safety and / or well-being of interns.
- b. report any concerns they may have about the safety and / or well-being of other persons associated with the college.
- c. report any safeguarding concerns about staff or anyone else associated with the college; and
- d. follow up on any such reports to ensure that appropriate action is or has been taken

8.1.4 The procedures for doing so are set out below. If staff are unsure about the appropriate process to use, they should not hesitate to exercise professional curiosity and speak to the DSL, any member of the SLT or directly to children's social care (whether the college 's local authority or that local to the child's home address) or police in their absence for guidance.

8.2 What to do if staff have concerns over an intern's welfare.

- 8.2.1 If staff have any concern about an intern's welfare, they should follow the procedures in this policy and report their concern to the DSL (or the DDSL in the DSL's absence) immediately.
- a. The contact details of the DSL and DDSL are set out in the contacts list at the front of this policy.
 - b. See Appendix 2 for guidance about what to do when receiving a disclosure and paragraph 23 below relating to recording a concern.
- 8.2.2 A concern about a child is not defined and should be interpreted broadly. It may relate to a recognition that a child would benefit from extra support to an emerging problem or to a potentially unmet need or may reflect a concern that a child may be deemed to be "in need" or at "immediate risk of harm" as defined by the Children Act 1989.
- 8.2.3 Staff must report known cases of female genital mutilation (FGM) to the police. See [Appendix 1](#) for further information about FGM and this reporting duty. All other staff should refer FGM concerns to the DSL.
- 8.2.4 If the concern involves an allegation or concern raised about a member of staff, supply staff, contractors, or volunteers this must be reported in accordance with the procedures set out in Appendix 4 and parts 1 and 4 of KCSIE.
- 8.2.5 **What if the DSL is unavailable?**
- a. The DSL or the DDSL should always be available to discuss safeguarding concerns and may be contacted on their mobile phones in relation to any safeguarding concerns out of college hours.
 - b. If in exceptional circumstances the DSL and DDSL are unavailable, staff must not delay taking action. Staff should speak to their line manager or a member of the SLT and / or advice should be taken from children's social care. Their contact details are set out at the front of this policy.

- c. Where a child or young person is suffering, or is likely to suffer from harm, a referral to children's social care and / or police should be made immediately⁶. Staff should be aware of the process for making referrals direct to children's social care and / or the police in these circumstances. See section 11 below for further details on making a referral.
- d. Any action taken by a member of staff pursuant to this requirement should then be shared with the DSL or DDSL, or a member of the SLT, as soon as is practically possible.

8.3.1 Action by the DSL

- 8.3.1 On receipt of a report of a concern, the DSL will consider the appropriate course of action in accordance with the appropriate Local Safeguarding Children Partnership's procedures and referral threshold document. Such action may include:
 - a. managing any support for the intern internally via the college 's own pastoral support processes, seeking advice from children's social care where required (see [9](#) below);
 - b. undertaking an early help assessment (which generally requires parental consent) (see [10](#) below); or
 - c. making a referral for statutory services (see [11](#) below).
- 8.3.2 The views of the young person will be taken into account when considering the appropriate course of action but will not be determinative.
- 8.3.3 Where the concern relates to the welfare of an intern who is aged 18 or over, the DSL will consider whether it is necessary to refer such concerns to the Safeguarding Adults Board rather than, or in addition to, children's social care.
- 8.3.4 If it is decided that a referral is not required, the DSL will keep the matter under review and consider a referral if the intern's situation does not appear to be improving.

9. Managing support for interns internally

- 9.1 The college has a strong pastoral care process through regular reviews and daily check-ins for the identification, assessment, management, and review of risk to intern welfare, so that appropriate action can be taken to reduce the risks identified.
- 9.2 The college will ensure that appropriate advice and consultation is sought about the management of safeguarding issues, including advice from CSC where necessary.

The criteria regarding the involvement of the police is a context-driven judgement-call, but if the safety of the child or young person is in any doubt, or it is believed that a crime has been committed, the police should be called. If the child or young person requires urgent medical

attention an ambulance should be called to take the child or young person to hospital. Further guidance can be found here [When to call the police](#)

10. Early help assessment

- 10.1 Early help, also known as early intervention, is support given to a family when a problem first emerges. It can be provided at any stage of a child or young person's life to parents, children, or whole families, and is generally supported by CSC in consultation with the family.
- 10.2 The college understands that providing early help is more effective in promoting the welfare of children and young people than reacting later.
- 10.3 The college 's safeguarding training includes guidance about early help processes and prepares all staff to identify young people who may benefit from early help. Staff are mindful of specific safeguarding issues and those interns who may face additional safeguarding challenges. Staff should be particularly alert to the potential need for early help for a young person who:
 - 10.3.1 is disabled or has certain health conditions and has specific additional needs.
 - 10.3.2 has special educational needs (whether they have a statutory education, health, and care plan).
 - 10.3.3 has a mental health need.
 - 10.3.4 is a young carer.
 - 10.3.5 is showing signs of being drawn into antisocial or criminal behaviour, including gang involvement and association with organised crime groups or county lines.
 - 10.3.6.is frequently missing / goes missing from care or from home.
 - 10.3.7 is at risk of modern slavery, trafficking sexual or criminal exploitation.
 - 10.3.8 is at risk of being radicalised or exploited.
 - 10.3.9 has a family member in prison or is affected by parental offending.
 - 10.3.10is in a family circumstance presenting challenges for the young person, such as substance abuse, adult mental health problems or domestic abuse.
 - 10.3.11 is misusing alcohol or other drugs themselves.
 - 10.3.12 is looked after or has returned home to their family from care.
 - 10.3.13 is at risk of 'honour' based abuse such as Female Genital Mutilation or forced marriage.
 - 10.3.14 is a privately fostered; and
 - 10.3.15 is persistently absent from education including persistent absences for part of the college day.
- 10.4. A member of staff who considers that an intern may benefit from early help should keep a written record of their concerns and in the first instance discuss this with the DSL (see paragraph 23 'record keeping' below and appendix 2 for further guidance). The DSL will consider the appropriate action to take in accordance with the Local Safeguarding Children Partnership menu of early help services and their referral threshold document and will support staff in liaising with parents and other agencies and setting up an inter-agency assessment as appropriate.
- 10.5 If early help is appropriate, staff may be required to support other agencies and professionals in an early help assessment and will be supported by the DSL in carrying out this role. In some cases, college staff may be required to take a lead role.

- 10.6 The matter will be kept under review and consideration given to a referral to children's social care for assessment for statutory services if the intern's situation appears to be getting worse or does not appear to be improving. See point 8.3.1 for interns over 18.

11. Making a Referral

- 11.1 Where a child or young person is suffering, or is likely to suffer from harm, a referral to children's social care (and if appropriate the police) should be made immediately.
- 11.2 Harm" is the "ill treatment or impairment of the health or development of a child." Seeing or hearing the ill-treatment of another person is also a form of harm. It can be determined "significant" by "comparing a child's health and development with what might be reasonably expected of a similar child."
- 11.3. The contact details for the college 's CSC team are set out at the front of this policy.
- 11.4 Anyone can contact CSC to discuss concerns before a referral is made. This includes professionals as well as a young person themselves, family members and members of the public. The child's local safeguarding children partner will have a threshold of need framework and guidance which will provide more information which can support decision making in relation to contacting CSC. www.manchestersafeguardingpartnership.co.uk.

11.5 Statutory Assessments

- 11.5.1 Children's social care may undertake a statutory assessment under the Children Act 1989 into the needs of the child. It is likely that the person making the referral will be asked to contribute to this process. Statutory assessments include:
- a) Children in need: A child in need is a child who is unlikely to achieve or maintain a reasonable level of health or development, or whose health and development is likely to be significantly or further impaired, without the provision of services; or a child who is disabled. Children in need may be assessed under section 17 of the Children Act 1989.
 - b) Children suffering or likely to suffer significant harm: Local authorities have a duty to make enquiries under section 47 of the Children Act 1989 if they have reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm.
- 11.6 Anybody can make a referral. Staff required to make a direct referral may find the flowchart set out on page 22 of KCSIE helpful and the flowcharts set out in Chapter 1 of WTSC for information about the likely actions and decisions required.
- 11.7 Parental consent is not required for referrals to statutory agencies, but Staff

will need to have access to certain information about the child/young person and the safeguarding concern to make the referral. In general terms, this information will comprise:

- 11.7.1. personal details of the child/ young person including developmental needs.
- 11.7.2 detailed information about the concern.
- 11.7.3 information about the child/ young person's family and siblings including the capacity of the parents or carers to meet the child/ young person's developmental needs and any external factors that may be undermining their capacity to parent.

11.8 If the referral is made by telephone, this should be followed up in writing.

If the referral is made by someone other than the DSL, the DSL should be informed of the referral as soon as possible.

11.9 Confirmation of the referral and details of the decision as to what course of action will be taken should be received from the local authority within one working day. If this is not received, the DSL (or the person that made the referral) should contact children's social care again.

11.10 Following a referral, if the child/ young person's situation does not appear to improve, the local escalation procedures should be followed to ensure that the concerns have been addressed and that the child/ young person's situation improves, in accordance with the procedures set out in Appendix 5.

12. Allegations against interns - child on child abuse

12.1 Allegations against interns should be reported in accordance with the procedures set out in this policy in Appendix 3. If harmful sexual behaviour is alleged to have occurred, the DSL will have regard to Part 5 of KCSIE and consider the local response of the police and children's social care to these issues. The views of the alleged victim will be considered but will not be determinative.

12.2 All those involved in such allegations will be treated as being at risk and in need of support and the safeguarding procedures in accordance with this policy will be followed. Appropriate support will be provided to all interns involved, including support from external services as necessary.

13. Extra-familial harm

13.1 Safeguarding incidents and / or behaviours can be associated with factors outside the college and / or can occur between children/young people outside the college, inside and outside of home and online.

13.2 Children's social care should be informed of all such information to allow any assessment process to consider all available evidence and the full context of any abuse.

This is defined by the DfE as sexual behaviours expressed by children and young people that are developmentally inappropriate, may be harmful towards self or others, or abusive towards another child, young person, or adult.

- 13.3 Extra-familial harm: all staff, but especially the DSL (and deputies) should consider whether children/ young people are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual abuse (including harassment and exploitation), domestic abuse in their own intimate relationships (teenage relationship abuse), criminal exploitation, serious youth violence and county lines and radicalisation.

14.Risk assessment

- 14.1 Where a concern about an intern's welfare is identified, the risks to that intern's welfare will be assessed and appropriate action will be taken to reduce the risks identified.
- 14.2 The format of risk assessment may vary and may be included as part of the college's overall response to a welfare issue, including the use of individual intern welfare plans (such as behaviour, healthcare, and independent learning plans, as appropriate). Regardless of the form used, the college 's approach to promoting intern welfare will be systematic and intern focused.
- 14.3 The Head has overall responsibility for ensuring that matters which affect intern welfare are adequately risk assessed and for ensuring that the relevant findings are implemented, monitored, and evaluated.
- 14.4 Day to day responsibility to carry out risk assessments under this policy will be delegated to the DSL who has been properly trained and tasked with carrying out the assessment.

15. What to do if staff have a safeguarding concern about someone else's welfare

- 15.1 Staff who have safeguarding concerns about the welfare of others or any other safeguarding issue not expressly covered by this policy, should report them.
- 15.2 In the absence of an express procedure about reporting, they should report such concerns to the DSL/ DDSL in the first instance.

16.Allegations made, and or/concerns raised about staff and others in college

- 16.1 The college has a policy and procedures for managing allegations made and/or concerns raised about any adult working for, or on behalf of, the college, whether paid or unpaid, or any Other Adult (as defined in Appendix 4) which may affect the safety and welfare of children and young people.
- 16.2 The procedures in this policy apply to staff who pose a risk of harm to children or may behave in a way that indicates that they may be unsuitable to work with children and young people. They also apply to low level concerns that do not meet the harm threshold. The policy and procedures aim to strike a balance between the need to protect children and young people from abuse and the need to protect staff from malicious, unfounded, false, or unsubstantiated allegations.

These procedures are set out in Appendix 4 and follow the guidance in Parts 1 and 4 of KCSIE.

- 16.3 The college will follow its employment procedures for dealing with any other safeguarding concern raised about staff, involving external agencies as appropriate.
- 16.4 Detailed guidance is provided to staff to ensure that all staff are clear on the rules of conduct and the expectations of the college in relation to contact with interns, parents, colleagues, and any other person who encounters them in the college. This guidance is contained in the Staff Code of Conduct and includes details of additional safeguarding arrangements where staff engage in one-to-one teaching and meetings with interns.

17. Informing parents

- 17.1 Parents will normally be kept informed, as appropriate, of any action to be taken under these procedures. However, there may be circumstances when the DSL will need to consult the Head, the Designated Officer(s), children's social care, the police and / or the intern before discussing details with parents.
- 17.2 In all cases, the DSL will be guided by the Manchester Safeguarding Children Partnership's referral threshold document.
- 17.3 See also Appendix 4 for details about the disclosure of information where an allegation has been made against a member of staff.

18. Additional reporting

- 18.1 In addition to the reporting requirements explained above, the college will consider whether it is required to report safeguarding incidents to any other regulatory body or organisation, including but not limited to:

18.1.1 Health and Safety Executive

The college is legally required under RIDDOR to report certain incidents to the Health and Safety Executive. Please see the college 's Health and Safety Policy for further details about this.

18.1.2 Disclosure and Barring Service

A referral to the DBS will be made promptly if the criteria are met. See Appendix 4 for further details.

18.1.3 Teaching Regulation Agency (TRA)

Separate consideration will be given as to whether a referral to the TRA should be made where a teacher has been dismissed or would have been dismissed if he / she had not resigned. See Appendix 4 for more details.

19.Safer recruitment and supervision of staff

- 19.1 The college is committed to practising safer recruitment in checking the suitability of staff (including staff employed by another organisation). See the college 's separate recruitment policy.
- 19.2 The college maintains a single central register of appointments for all staff.

20.Use of mobile technology

- 20.1 The college 's policy on the use of mobile technology, including phones and cameras, in the college, is as follows:
- 20.1.1 the college 's E-Safety & Online Safety policy sets out the expectations on interns
 - 20.1.2 all staff should use mobile devices and cameras in accordance with the guidance set out in the staff Online Safety Policy.
- 20.2 The college allows access to the internet onsite. Appropriate internet safety measures are taken to manage associated risks, including use of filters and monitoring of usage.
- 20.3 The college 's approach to online safety is set out in the college 's Online Safety Policy and Acceptable Use Policy for interns.

21.Training

- 21.1 The college ensures that regular guidance and training is arranged on induction and at regular intervals thereafter so that staff understand what is expected of them by this policy and have the necessary knowledge and skills to carry out their roles.
- 21.2 The level and frequency of training depends on the role of the individual member of staff.
- 21.3 The college maintains written records of all staff training.
- 21.4 All training will be carried out in accordance with Manchester Safeguarding Children Partnership's procedures where possible.

21.5 Induction

- 21.5.1 All staff, including temporary staff and volunteers, will be provided with induction training that includes (and where relevant includes the provision of copies of):
- a. this policy.
 - b. the role, identity and contact details of the DSL and his Deputy.
 - c. the Behaviour, Discipline and Exclusion Policy for interns.
 - d. the Anti-Bullying Policy, which includes details of the college 's policy on cyberbullying and prejudice-based and discriminatory bullying.
 - e. the Staff Conduct Policy, the whistleblowing policy, social media policy and acceptable use policy.
 - f. the safeguarding response to children and young people who go missing from education.
 - g. the college 's approach to online safety.
 - h. safeguarding training in accordance with Manchester Safeguarding Children Partnership's procedures including guidance on managing a report of child- on-child harmful sexual behaviour.
 - i. where determined appropriate by the, a copy of Annex A of KCISE for those staff no wording directly with children; or
 - j. a copy of Part 1 of KCSIE and, where appropriate, Annex B of KCSIE (for college leaders and those working directly with children); and
 - k. appropriate Prevent duty training.

21.6 Safeguarding training

- 21.6.1 Staff not working directly with children and young people will receive a copy of this policy and where determined appropriate, Annex A of KCSIE and will be required to confirm that they have read and understand these;
- 21.6.2 College leaders and all staff working directly with children and young people will receive a copy of this policy and Part 1 (and where

appropriate Annex B⁹) of KCSIE and will be required to confirm that they have read and understand these via an annual affirmation statement.

21.6.3 Members of the SLT (including the Head) and the Nominated Safeguarding Governor will receive a copy of this policy and be expected to read all KCSIE.

21.6.4 All staff members (including the Head) will undertake appropriate safeguarding training which will be updated every year and following consultation with the Manchester Safeguarding Children Partnership's local arrangements and this policy. In addition, all staff members will receive informal safeguarding and child protection updates including online safety via email and staff meetings on a regular basis and at least annually.

21.6.5 Staff development training will also include training on Prevent duty training assessed as appropriate for them by the college.

21.6.6 Additionally, the college will assess the appropriate level and focus for staff training and responsiveness to specific safeguarding concerns such as radicalisation, child on child abuse, harmful sexual behaviour, child criminal and child sexual exploitation, female genital mutilation, cyberbullying, prejudiced-based and discriminatory bullying, and mental health and to ensure that staff have the skills, knowledge and understanding to keep looked after children safe.

21.6.7 All Governors receive safeguarding training (including online safety) on induction. This training will equip them with the knowledge to provide strategic challenges to test and assure themselves that the college's safeguarding policies in place are effective and support a robust whole college approach to safeguarding. This training will be regularly updated.

21.6.8 The Nominated Safeguarding Governor and the Chair of Governors will receive additional appropriate training to enable them to fulfil their safeguarding responsibilities. As part of that training the Nominated Safeguarding Governor will be expected to read the entirety of KCSIE. All other Governors will be expected to read Part 2 of KCSIE.

21.6.9 The college has mechanisms in place to assist staff to understand and discharge their role and responsibilities and to ensure that they have the relevant knowledge, skills, and experience to safeguard children effectively, including staff meetings and professional development opportunities. This includes information on how staff can report concerns occurring out of hours / out of term time.

21.6.10 Designated Safeguarding Lead (DSL)

- a. The DSL and Deputy DSL will undertake training to provide them with the knowledge and skills required to carry out the role. This training includes inter-agency working and Prevent awareness training and will be updated at least every two years.
- b. In addition, their knowledge and skills will be refreshed at regular intervals, at least annually, to allow them to understand and keep up with any developments relevant to their role. For further details about the training of the DSL, see Annex C of KCSIE.
- c. Prevent duty training will be consistent with the Government's Prevent training for colleges. See [Educate Against Hate](#) (HM Government, 2018) for further details.

21.6.11 Teaching interns about safeguarding

- a. The college teaches interns about safeguarding through the curriculum. This includes guidance on adjusting behaviour to reduce risks, particularly online, building resilience to protect themselves and their peers, fostering healthy and respectful relationships with others and providing information about who they should turn to for help.
- b. The college recognises that a one size fits all approach may not be appropriate for young people, and a more personalised or contextualised approach for more vulnerable young people, victims of abuse and some SEND young people might be needed.
- c. Interns are taught about harmful sexual behaviours, including sexual violence and sexual harassment, through relationships education / relationships and sex education and PSHE education appropriate to their age and stage of development. It will tackle issues such as: healthy and respectful relationships, boundaries and consent, stereotyping prejudice and equality, body confidence and self-esteem, how to recognise abusive relationships, including coercive and controlling behaviour, concepts and laws relating to sexual consent, sexual exploitation, abuse, grooming, harassment, rape, domestic abuse, so-called "honour-based" violence and how to access support , what constitutes sexual harassment and sexual violence and why these are always unacceptable.
- d. Interns are given the opportunity to talk about safeguarding issues within the classroom environment and are made aware of the processes by which any concerns they have can be raised, including the processes for reporting a concern about a friend or peer, and how any report will be handled. This can be directly to a member of staff or on an email (Safeguarding@disc.ac.uk)
- e. The safe use of technology is a focus in all areas of the curriculum and key ICT safety messages are reinforced as part of intern voice presentations so that interns learn how to keep themselves safe online and when accessing remote learning. DISC has ensured

appropriate filters and monitoring systems are in place at the college (see the online safety policy) and is mindful that this should not lead to unnecessary restrictions on learning.

22. Monitoring and review

- 22.1 The DSL will ensure that the procedures set out in this policy and the implementation of these procedures are updated and reviewed regularly, working with DISC as necessary and seeking contributions from staff. The DSL will update the Senior Management Team regularly on the operation of the college's safeguarding arrangements.
- 22.2 Any safeguarding incidents at the college will be followed by a review of these procedures by the DSL and a report made to DISC through the Nominated Safeguarding Governor. Where an incident involves a member of staff, the Designated Officer(s) will be asked to assist in this review to determine whether any improvements can be made to the college's procedures. Any deficiencies or weaknesses with regards to safeguarding arrangements at any time will be remedied without delay.
- 22.3 This policy will be updated whenever needed to ensure that it remains up to date with safeguarding issues as they emerge and evolve, including in relation to lessons learnt.
- 22.4 The Governing Body will also undertake an annual review of this policy and the college's safeguarding procedures, including an update and review of the effectiveness of procedures and their implementation and the effectiveness of inter-agency working. It will also undertake an annual review of its approach to online safety, supported by an annual risk assessment that considers and reflects the risks its interns face.
- 22.5 The DSL will work with the Nominated Safeguarding Governor to prepare a written report commissioned by the Board. The written report should address how the college ensures that this policy is kept up to date; staff training on safeguarding; referral information; issues and themes which may have emerged in the college and how these have been handled including lessons learned and the contribution the college is making to multi-agency working in individual cases or local discussions on safeguarding matters. The Board should also consider independent corroboration, such as:
- 22.5.1 inspection of records or feedback from external agencies including the Designated Officer(s);
 - 22.5.2 reports of inspections. ie. Ofsted.
 - 22.5.3 the outcome of any relevant complaints, claims or related proceedings; and
 - 22.5.4 press reports.

- 22.6 The Safeguarding Lead on the Governing Body, will review the report, this policy and the implementation of its procedures and consider the proposed amendments to the policy before giving the revised policy its final approval. They will report to the Governing Body on a termly basis.

23.Record keeping

- 23.1 All concerns, discussions and decisions made and the reasons for those decisions should be recorded in writing on a DISC Digital Note of Concern. This will also help if/when responding to any complaints about the way a case has been handled by the college. Information should be kept confidential to those who need to know and stored securely. Concerns and referrals will be kept in a separate child protection file for each child. These should include:

23.1.1 a clear and comprehensive summary of the concern.

23.1.2 details of how the concern was followed up and resolved; and

23.1.3 a note of any action taken, decisions reached and the outcome.

- 23.2 The information created in connection with this policy may contain personal data. The college's use of this personal data will be in accordance with data protection law. The college has published on its website privacy notices which explain how the college will use personal data.

- 23.3 All records created in accordance with this policy are managed in accordance with the college 's policies that apply to the retention and destruction of records.

- 23.4 Insofar as intern records are concerned:

23.4.1 Staff must record all concerns about an intern on a Digital Note of Concern, and then inform the DDSL or the DSL that this has been completed. Guidance on record keeping is set out in Appendix 2.

23.4.2 The DSL will add the relevant key points to the Note of Concern including discussions with both colleagues and external agencies, decisions made and the reasons for them and detail of the action taken.

23.5 Information sharing and multi-agency working"

- 23.5.1 The college will treat all safeguarding information with an appropriate level of confidentiality, only involving others where appropriate. The college will always act to safeguard and promote the welfare of others.

23.5.2 The college understands that information sharing is essential for effective safeguarding and promoting the welfare of children and young people, including their educational outcomes. Fears about sharing information will not stand in the way of the need to promote the welfare and protect the safety of interns, which is always the college's paramount concern. Colleges have clear powers to share, hold and use information for these purposes and the UK GDPR and Data Protection Act 2018 provide a framework to ensure that personal information is shared appropriately.

23.5.3 When the college receives a request for safeguarding information (e.g., a subject access request from a parent or a request from the police), the college will carefully consider its response to make sure that any disclosure is in accordance with its obligations under the UK GDPR and Data Protection Act 2018. The college will also have regard to its data protection policies. DISC's Data Protection Officer will work with the DSL as appropriate to determine what should be disclosed.

23.5.4 The college will cooperate with children's social care, and where appropriate the police, to ensure that all relevant information is shared for the purposes of early help assessments, and assessments and child protection investigations under the Children Act 1989.



23.5.5 Where allegations have been made against staff, the college will consult with the Designated Officer(s) and, where appropriate, the police and children's social care to agree the information that should be disclosed and to whom.

23.5.6 While the college will share information with those involved where and when it is appropriate to do so, they may be unable to for reasons of data protection and confidentiality, for example because to do so may pose a risk of harm to others or because it has been prohibited by external agencies.

¹¹ For further information, see [Information sharing: advice for practitioners providing safeguarding services](#) (July 2018), which contains a myth-busting guide to information sharing.

Throughout all appendices 'Child' should also be read as 'young person' with reference to any interns over 18.

Approved and Signed by:

Andy Lovatt, CEO		10th October 2023
Caroline Dean, Head of College		11th October 2023
Diane Ainsworth, Chair of Governors		

Appendix 1 Forms of abuse and neglect and specific safeguarding risks

1. Abuse and neglect

- 1.1 Staff should be aware that abuse, neglect, and safeguarding issues are rarely standalone events that can be covered by one definition or label and in most cases, multiple issues will overlap with one another, therefore staff should always be vigilant and always raise any concerns with the DSL (or deputy).
- 1.2. Children and young people can also abuse their peers online, this can take the form of abusive, harassing, and misogynistic messages, the non-consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography, to those who do not want to receive such content.

2. Definitions of abuse and neglect

- 2.1 Abuse: a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place in person and/or wholly online or technology may be used to facilitate offline abuse. They may be abused by an adult or adults or by another child or children.
- 2.2 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.
- 2.3 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 from participating in normal social interaction. It may involve seeing or hearing the ill treatment of another. It may involve serious bullying (including cyberbullying and prejudiced-based or discriminatory bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

- 2.4 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 the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue (also known as child-on-child abuse) in education and all staff should be aware of it. The college policy and procedures can be found in Appendix 3.

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

3. Signs of Abuse

3.1 Possible signs of abuse include, but are not limited to

3.1.1 the intern says he / she has been abused or asks a question or makes a comment which gives rise to that inference.

3.1.2 there is no reasonable or consistent explanation for an intern's injury, the injury is unusual in kind or location or there have been a number of injuries and there is a pattern to the injuries.

- 3.1.3 the intern's behaviour stands out from the group as either being extreme model behaviour or extremely challenging behaviour, or there is a sudden or significant change in the intern's behaviour.
- 3.1.4 deterioration in educational progress and/or lack of engagement.
- 3.1.5 the intern asks to drop subjects with a particular teacher and seems reluctant to discuss the reasons.
- 3.1.6 the intern's development is delayed, the intern loses or gains weight or there is deterioration in the intern's general well-being.
- 3.1.7 the intern appears neglected, e.g. dirty, hungry, inadequately clothed;
- 3.1.8 the intern is reluctant to go home, or has been openly rejected by his / her parents or carers; and
- 3.1.9 inappropriate behaviour displayed by other members of staff or any other person working with children, for example inappropriate sexual comments; excessive one-to-one attention beyond the requirements of their usual role or responsibilities; or inappropriate sharing of images

4. Specific Safeguarding Issues

- 4.1 Statutory guidance acknowledges the following as specific safeguarding issues:
 - 4.1.1 child abduction and community safety incidents.
 - 4.1.2 children and the court system.
 - 4.1.3 children missing from education (see section 5 below);
 - 4.1.4 children with family members in prison.
 - 4.1.5 child criminal exploitation and child sexual exploitation (see section 7 below)
 - 4.1.6 county lines.
 - 4.1.7 modern slavery and the national referral mechanism.
 - 4.1.8 cybercrime.
 - 4.1.9 domestic abuse.

- 4.1.10 homelessness.
- 4.1.11 so-called 'honour-based' abuse (including Female Genital Mutilation and Forced marriage);
- 4.1.12 preventing radicalisation
- 4.1.13 child on child abuse
- 4.1.14 sexual violence and sexual harassment between children in colleges and colleges.
- 4.1.15 upskirting.

4.2 Further advice and links to guidance on these specific safeguarding issues can be found in Annex B of KCSIE. Staff should be particularly aware of the safeguarding issues set out below.

5. Children missing from education

5.1 Children going missing, particularly persistently, can act as a vital warning sign of a range of safeguarding issues including neglect, sexual abuse, and child sexual and criminal exploitation, including involvement in county lines. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of FGM, "honour-based" abuse or risk of forced marriage. College attendance registers are carefully monitored to identify any trends. Action should be taken in accordance with this policy if any absence of an intern from the college gives rise to a concern about his / her welfare.

5.2 Where reasonably possible the college will hold more than one emergency contact for each intern.

5.3 The college shall inform the local authority of any intern who is going to be added to or deleted from the college 's admission register at non-standard transition points in accordance with the requirements of the Education (intern Registration) (England) Regulations 2006 (as amended).

5.4 This will assist the local authority to:

- 5.4.1 fulfil its duty to identify children of compulsory college age who are missing from education; and
- 5.4.2 follow up with any child who might be in danger of not receiving an education and who might be at risk of abuse, neglect or radicalisation or involvement with serious violent crime.

5.5 The college shall inform the local authority of any intern who:

- 5.5.1 fails to attend college regularly; or
- 5.5.2 has been absent without the college 's permission for a continuous period of ten college days or more, at such intervals as are agreed between the college and the local authority (or in default of such agreement, at intervals determined by the Secretary of State).

6. Elective Home Education (EHE)

6.1 Where a parent expresses their intention to remove an intern from college with a view to educating at home, the college will work with the local authority and other key professionals to coordinate a meeting with parents where possible, ideally before a final decision has been made. This is to ensure parents have considered what is in the best interests of their child. This will be particularly important where a child has SEND, is vulnerable, and / or has a social worker.

7. Child Sexual Exploitation (CSE) and Child criminal exploitation (CCE)

7.1 Both CSE and CCE are forms of abuse where an individual or group (adult or another child) takes advantage of an imbalance of power to coerce, manipulate or deceive a child into taking part in sexual or criminal activity:

7.1.1 in exchange for something the victim needs or wants e.g. money, gifts or affection; and / or

7.1.2 for the financial advantage or increased status of the perpetrator or facilitator; and/ or

7.1.3 through violence or threat of violence to victims (and their families).

7.2 Children can be exploited by adult males or females, as individuals or in groups.

They may also be exploited by other children, who themselves may be experiencing exploitation - where this is the case, it is important that the child perpetrator is also recognised as a victim.

7.3 CSE and CCE can affect children of any sex and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation.

7.4 The victim may have been exploited even if the activity appears consensual.

7.5 CCE can include children being coerced into moving drugs or money across the country (county lines), forced to shoplift or pickpocket, or to threaten other young people.

7.6 Some of the following can be indicators of both CSE and CCE, including children who:

7.6.1 appear with unexplained gifts, money, or new possessions.

7.6.2 associate with other young people involved in exploitation.

7.6.3 suffer from changes in emotional well-being.

7.6.4 misuse drugs and alcohol.

7.6.5 go missing for periods of time or regularly come home late; or

- 7.6.6 regularly miss college or education or do not take part in education.
- 7.7 Children who have been exploited will need additional support to help maintain them in education.
- 7.8 CSE can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence.
- 7.9 The victim may have been sexually exploited even if the sexual activity appears consensual. CSE does not always involve physical contact; it can also occur using technology. CSE can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity and may occur without the child or young person's immediate knowledge (e.g., through others copying videos or images they have created and posted on social media). The above CCE indicators can also be indicators of CSE, as can children who:
- 7.9.1 have older boyfriends or girlfriends; or
- 7.9.2 suffer from sexually transmitted infections or become pregnant.

8 County lines

- 8.1 County lines¹² 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". They are likely to exploit children and vulnerable adults to move store and sell drugs and money and they will often use coercion, intimidation, violence (including sexual violence) and weapons.

¹² See the Home Office's [Preventing youth violence and gang involvement](#) and its [Criminal exploitation of children and vulnerable adults: county lines](#) guidance for more information.

- 8.2 Children are increasingly being targeted and recruited online using social media. Children can easily become trapped by this type of exploitation as county lines gangs can manufacture drug debts which need to be worked off and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.
- 8.3 A number of the indicators for CSE and CCE as detailed above (and in Annex B of KCSIE) may also be applicable to children involved in county lines.
- 8.4 Additional reporting duties:
- 8.4.1 if a child is suspected to be at risk of, or involved in county lines, a safeguarding referral should be considered alongside consideration of availability of local services / third sector providers who offer support to victims of county lines exploitation.

- 8.4.2 where an intern may have been trafficked for the purpose of transporting drugs, a referral to the National Referral Mechanism¹³ should be considered.

9. Serious violence

- 9.1 Indicators which may signal children are at risk from, or are involved with serious violence crime may include:
- 9.1.1 Increased absence from college.
 - 9.1.2 a change in friendships or relationships with older individuals or groups.
 - 9.1.3 a significant decline in performance.
 - 9.1.4 signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries.
 - 9.1.5 unexplained gifts or new possessions 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.
- 9.2 Staff should be aware of the range of risk factors which increase the likelihood of involvement in serious violence e.g. being male, having frequently absent or permanently excluded from college, having experienced child maltreatment and having been involved in offending, such as theft or robbery. Further advice for colleges is provided in the Home Office's Preventing youth violence and gang involvement and its Criminal exploitation of children and vulnerable adults: county lines guidance.

10. Cybercrime

- 10.1 Cybercrime is a criminal activity committed using computers and / or the internet. It's broadly categorised as either 'cyber-enabled' (crimes that can happen off-line but enabled at scale and speed online e.g. fraud, purchasing of illegal drugs, child sex abuse and exploitation) or 'cyber-dependent' (crimes that can only be committed by using a computer).

For further information and a definition of trafficking, see: [National Crime Agency - modern slavery and human trafficking](#) and the DfE and Home Office guidance: [Trafficking: safeguarding children](#)

- 10.2 Cyber-dependent crimes include:
- 10.2.1 Unauthorised access to computers (illegal hacking) e.g. accessing a college computer network to look for test papers or change grades awarded;
 - 10.2.2 Denial of Service (Dos or DDos) attacks or 'booting' - attempts to make a computer, network, or website unavailable by overwhelming it with internet traffic.
 - 10.2.3 Making, supplying or obtaining malware e.g. viruses, spyware, ransomware, botnets and Remote Access Trojans with intent to commit further offence.

- 10.3 Children with particular skills and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime.
- 10.4 The DSL (or deputy) should consider referring into the Cyber Choices programme if they have concerns. This is a nationwide programme which intervenes when young people are at risk of committing, or being drawn into, low level cyber-dependent offences and divert them to a more positive use of their skills and interests.

11. Domestic abuse

- 11.1 Domestic abuse can encompass a wide range of behaviours and may be a single incident or pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial, or emotional.
- 11.2 Children can be victims of domestic abuse. They may see hear or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of this can have a detrimental and long-term impact on their health, well-being, development, and ability to learn.
- 11.3 All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. 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.
- 11.4 Further advice on identifying children who are affected by domestic abuse and how they can be helped can be found in Annex B of KCSIE. This includes details about Operation Encompass which operates in all police forces across England, helping colleges and police work together to provide emotional and practical help to children.

12. So-called 'honour-based' abuse

- 12.1 All forms of so-called 'honour-based' abuse are abuse (regardless of motivation) and should be handled and escalated as such. Abuse committed in the context of preserving "honour" often involves additional risk factors such as a wider network of family or community pressure and the possibility of multiple perpetrators which should be considered when deciding what safeguarding action to take. Staff should speak to the DSL if they have any doubts.
- 12.2 If appropriate, the DSL will activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and children's social care.

13. Female genital mutilation (FGM)

- 13.1 FGM is a form of so-called 'honour-based' abuse. It comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long lasting harmful consequences.
- 13.2 There is a range of potential indicators that a child or young person may be at risk of FGM. Guidance on the warning signs that FGM may be about to take place, or may

have already taken place, can be found on pages 38-43 of the [Multi-agency statutory guidance on FGM](#) (HM Government, July 2020) (pages 61-63 focus on the role of colleges).

- 13.3.1 All staff must be aware of the requirement for teachers to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. The report should be made orally by calling 101, the single non-emergency number. Those failing to report such cases will face disciplinary sanctions. It will be rare for teachers to see visual evidence, and they should not be examining interns. Unless the teacher has a good reason not to, they should still consider and discuss any such case with the DSL and involve children's social care as appropriate.
- 13.4 If the teacher is unsure whether this reporting duty applies, they must refer the matter to the DSL in accordance with this policy. See the Home Office guidance [Mandatory reporting of female genital mutilation - procedural information \(January 2020\)](#) for further details about the duty.
- 13.5 Guidance published by the [Department for Health](#) also provides useful information and support for health professionals which will be taken into account by the college's staff. The National FGM Centre has also produced FGM guidance to help colleges understand their role in safeguarding girls, engaging parents and teaching about FGM.

14. Forced marriage

- 14.1 Forced marriage is also a form of so-called 'honour-based' abuse. Forcing a person into marriage is a crime in England and Wales. A forced marriage is one entered 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 a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some communities use religion and culture to coerce a person into marriage.
- 14.2 Guidance on the warning signs that forced marriage may be about to take place, or may have already taken place, can be found on pages 13-14 of the [Multi-agency guidelines: handling case of forced marriage](#) (HM Government, June 2014).
- 14.3 Staff should speak to the DSL if they have any concerns. Pages 32-36 of the [Multi-agency guidelines: handling case of forced marriage](#) (HM Government, June 2014) focus on the role of colleges in detecting and reporting forced marriage and the Forced Marriage Unit can be contacted on 020 7008 0151 or fm@fco.gov.uk for advice and information.

15. Radicalisation and the Prevent duty

- 15.1 The college has a legal duty to have due regard to the need to prevent people from being drawn into terrorism.
- 15.2 The college aims to build interns' resilience to radicalisation by promoting fundamental British values and enabling them to challenge extremist views. Being

drawn into terrorism includes not just violent extremism but also non-violent extremism, which can create an atmosphere conducive to terrorism and can popularise views which terrorists exploit. The college is committed to providing a safe space in which children, young people and staff can understand and discuss sensitive topics, including terrorism and the extremist ideas that are part of terrorist ideology, understand the risks associated with terrorism and develop the knowledge and skills to be able to challenge extremist arguments.

- 15.3 The college has adopted the government's definitions for the purposes of compliance with the Prevent duty:
- 15.4 Extremism: "vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. We also include in our definition of extremism calls for the death of members of our armed forces, whether in this country or overseas."
- 15.5 Radicalisation: "the process by which a person comes to support terrorism and forms of extremist ideologies associated with terrorist groups."
- 15.6 Terrorism: "an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and made for the purpose of advancing a political, religious or ideological cause."
- 15.7 Although there is no single way of identifying an individual who is likely to be susceptible to an extremist ideology, there are possible indicators that should be taken into consideration alongside other factors and contexts. Background factors combined with specific influences such as family and friends may contribute to a child's vulnerability. Radicalisation can occur through many different methods (such as social media) and settings (such as the internet).
- 15.8 It is possible to protect vulnerable people from extremist ideology and intervene to prevent those at risk of radicalisation being radicalised. As with managing other safeguarding risks, staff should be alert to changes in children's behaviour which could indicate that they may need help or protection. College staff should use their professional judgement in identifying children who might be at risk of radicalisation and act proportionately which may include the DSL making a Prevent referral.
- 15.9 Prevent referrals may be passed to a multi-agency Channel panel, which will discuss the individual referred to determine whether they are vulnerable to being drawn into terrorism and consider the appropriate support required. An individual's engagement with the programme is entirely voluntary at all stages. Guidance on Channel is available at: [Channel duty guidance: protecting vulnerable people from being drawn into terrorism](#) (HM Government, February 2021) The DfE and Home Office's briefing note [The use of social media for online radicalisation](#) (DfE, July 2015) includes information on how social media is used to radicalise young people and guidance on protecting interns at risk.

16. Child on child abuse

- 16.1 All staff should be aware that children can abuse other children (often referred to as child-on-child abuse) and that it can happen both inside and outside of college or online.
- 16.2 The college's policy and procedures for dealing with child-on-child abuse can be found in Appendix 3 below.

17. Online safety

- 17.1 All staff should be aware that technology is a significant component in many safeguarding and wellbeing issues. Children are at risk of abuse online as well as face to face. In many cases abuse will take place concurrently via online channels and in daily life.
- 17.2 It is essential that children are safeguarded from potentially harmful and inappropriate online material. An effective, whole college approach to online safety empowers a college to protect and educate interns, and staff in their use of technology and establishes mechanisms to identify, intervene in, and escalate any concerns where appropriate. See the College's Online and Mobile Safety Policy for further guidance.
- 17.3 The breadth of issues classified within online safety is considerable, but can be categorised into four areas of risk:
 - 17.3.1 content: being exposed to illegal, inappropriate, or harmful content, for example: pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation, and extremism.
 - 17.3.2 contact: being subjected to harmful online 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 or exploit them for sexual, criminal, financial or other purposes.
 - 17.3.3 conduct: personal online behaviour that increases the likelihood of, or causes, harm; for example, 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
 - 17.3.4 commerce: risks such as online gambling, inappropriate advertising, phishing and or financial scams. If interns, students, or staff are at risk, it should be reported to the Anti-Phishing Working Group (<https://apwg.org/>).

18. Sharing nudes and semi-nude images and videos

- 18.1 Consensual and non-consensual sharing of nudes and semi-nude images and/or videos can be signs that children are at risk.
- 18.2 "Sharing nudes and semi-nudes" means the taking and sending or posting of nude or semi-nude images, videos, or live streams by young people under the age of 18 online. This could be via social media, gaming platforms, chat apps or forums. It can also involve sharing between devices offline e.g. via Apple's AirDrop. This is also known as sexting or youth produced sexual imagery.

- 18.3 The college treats all incidents of sharing nudes and semi-nude images as safeguarding matters to be actioned in accordance with this policy.
- 18.4 Members of staff must not intentionally view any nude or semi-nude images which are reported to them, or copy, print or share the images under any circumstances. In referring to any incident of sharing images, members of staff should describe the content of the images as reported to them.
- 18.5 The DSL may in exceptional circumstances view images with the prior approval of the Governor responsible for Safeguarding and only where:
- 18.5.1 it is the only way to decide whether to involve other agencies, as there is insufficient information available as to its contents.
- 18.5.2 it is necessary to report the image to a website, app or suitable reporting agency to have it taken down, or to support the intern or parent in making a report; or
- 18.5.3 an intern has reported the image directly to a member of staff in circumstances where viewing the image is unavoidable or images have been found on the college 's devices or network.
- 18.6 Where viewing an image is unavoidable:
- 18.6.1 viewing should take place on college premises wherever possible.
- 18.6.2 the image should be viewed by a person of the same sex as the person alleged to be shown in the image (where this is known);
- 18.6.3 a senior member of staff should be present to monitor and support the person viewing the image. This member of staff should not view the image.
- 18.6.4 full details of the viewing must be recorded in the college 's safeguarding records, including who was present, the date and time, the nature of the image and the reasons for viewing it.
- 18.6.5 any member of staff who views an indecent image should be given appropriate support.
- 18.7 If any devices need to be confiscated (whether in order to view the image(s) or to pass evidence to the appropriate authority), they should be turned off and locked away securely until they are required.
- 18.8 If an electronic device that is prohibited by the college rules has been seized and the member of staff has reasonable grounds to suspect that it contains evidence in relation to an offence, or that it contains a pornographic image of a child or an extreme pornographic image, the device will be given to the police.
- 18.9 If external agencies do not need to be involved, the college must consider the deletion of any images. interns should be asked to delete images themselves and to confirm that this is done. Members of staff should not search devices to delete images.

- 18.10 If images have been shared online and cannot now be deleted by the person who shared them, the college should consider reporting the images to the relevant web host or service provider (if an option is provided) or contacting the Internet Watch Foundation or ChildLine (if the website does not provide this option).
- 18.11 Where an intern receives unwanted images, the college should advise the intern and his/ her parents of options that may be available to block the sender or to change the intern's mobile phone number or email address.
- 18.12 The UK Council for Internet Safety's advice note [Sharing nudes and semi-nudes: advice for education settings working with children and young people](#) (DCMS and UKCIS, December 2020) contains details of support agencies and provides further information for colleges on how to responding to incidents of sexting.
 - 18.2 The Home Office has published [Indecent images of children: guidance for young people](#) (Home Office, November 2019) to help young people understand the law on indecent images of children and how to navigate the internet confidently and safely within legal boundaries.

19. Upskirting

- 19.1 Upskirting typically involves taking a picture under a person's clothing (not necessarily a skirt) without their permission or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm. Anyone of any gender can be a victim.
- 19.2 Upskirting is a criminal offence. Attempting to commit an act of upskirting may also be a criminal offence e.g. if actions are taken to do something that is more than merely preparatory to committing the offence such as attempting to take a photograph on a telephone or camera but failing to do so because of lack of storage space or battery.
- 19.3 The college will treat incidences of upskirting as a breach of discipline and also as a safeguarding matter under the college 's child protection procedures.
- 20. All matters relating to upskirting images and devices which may have been used in connection with an allegation of upskirting will be dealt with in a similar manner to sharing sexual images / sexting.

21. Additional Barriers

- 21.1 Additional barriers can exist when detecting the abuse or neglect of interns with SEND or certain medical or physical health conditions that can create additional safeguarding challenges for those involved in safeguarding and promoting the welfare of this group of children. The college is mindful that:
 - 21.1.1 assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the intern's condition without further exploration.
 - 21.1.2 interns with SEND or certain health conditions may be more prone to peer group and isolation and can be disproportionately impacted by bullying (including prejudice-based and discriminatory bullying) without outwardly showing any signs.

- 21.1.3 some interns may be unable to understand the difference between fact and fiction in online content and can repeat the content/behaviour in college without understanding the consequences; and
- 21.1.4 there may be communication barriers which are difficult to overcome to identify whether action under this policy is required.
- 21.2 The college should consider providing extra pastoral support and attention for these interns, along with ensuring any appropriate support for communication is in place.

22. Mental Health

- 22.1 Staff should be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.
- 22.2 Staff should not attempt to make a diagnosis as this can only be done by a trained professional. However, staff who have concerns that a child's behaviour may suggest they are experiencing mental health problems should follow the child protection policy and speak to the DSL or deputy DSL¹⁴. Staff should refer students to either the DSL or the Mental Health Lead.

23. Looked after children and previously looked after children

- 23.1 Digital Advantage ensures (where applicable) that staff have the skills, knowledge and understanding to keep looked after children safe and the information they need in relation to a child's looked after legal status, for example:
 - 23.1.1 whether they are looked after under voluntary arrangements with consent of parents or on an interim or full care order.
 - 23.1.2 contact arrangements with birth parents or those with parental responsibility.
 - 23.1.3 information about a child's care arrangements and the levels of authority delegated to the carer by the authority looking after him / her.

²⁵More guidance can be found at <https://www.gov.uk/government/publications/mental-health-and-behaviour-in-college-s--2> and for secondary college <https://campaignresources.phe.gov.uk/colleges/topics/mental-wellbeing/overview>

- 23.2 The DSL maintains these details, including contact details of the child's social worker²⁵. See 6.3.4 in the policy for the DSL's role in relation to interns who are looked after children.

24. Care leavers

24.1 The DSL maintains details of the local authority personal advisor appointed to guide and support care leavers and liaises with them as necessary regarding any issues of concern.

25. Children who are lesbian, gay, bi, or trans (LGBT)

25.1 The college recognises that interns who are or perceived to be LGBT are vulnerable to being targeted by other children.

25.2 LGBT inclusion is taught as part of the statutory relationship's education/ RSE/ PSHE/curriculum.

25.3 All staff are aware of these vulnerabilities and the college endeavours to provide a safe space to speak out or share concerns.

¹⁵

See <https://www.gov.uk/government/publications/designated-teacher-for-looked-after-children> for guidance on the DSL's role in relation to looked after children.

Appendix 2 Concerns about a child or young person - guidance for staff

1. Receiving a Disclosure

- 1.1 Listen carefully and keep an open mind. Do not take a decision as to whether or not the abuse has taken place.
- 1.2 Do not ask leading questions, i.e. a question which suggests its own answer. Use 'tell me, explain to me, describe to me' (TED) questioning. It is particularly important not to continue questioning an intern if they disclose something which suggests that a criminal offence may have been committed – the Police will need to take the lead on investigating and your questioning might compromise possible criminal proceedings.
- 1.3 Take the intern to the first aider if there is a medical need and do not examine the injury yourself.
- 1.4 Reassure the intern, they are being taken seriously and they will be supported and kept safe so that no victim will be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment and no victim ever be made to feel ashamed for making a report.
- 1.5 Do not give a guarantee of absolute confidentiality. Explain the need to pass on the information in accordance with this policy so that the correct action can be taken.
- 1.6 Keep a sufficient written record of the conversation (see [2](#) below). All other evidence, for example, scribbled notes, mobile phones containing text messages, clothing, computers, must be kept securely with the written record.
- 1.7 Pass on the record when reporting the concern in accordance with this policy.

2. Recording a Concern

- 2.1 Staff must record all concerns in writing on a Digital note of Concern.
- 2.2 Records should be factual and signed and dated, with the name of the signatory clearly printed in writing. Records should include:
 - 2.2.1 the intern's details: name; date of birth; address and family details.
 - 2.2.2 the intern's details: name; date of birth; address and family details.

- 2.2.3 a clear and comprehensive summary of the event /concern / conversation
 - 2.2.4 details of how the concern was followed up and resolved
 - 2.2.5 a note of any action taken and by whom, decisions reached and the outcome;
 - 2.2.6 the name and position of the person making the record.
- 2.3 Notes of Concern should be used for all written referrals. The record can be completed after an initial discussion with the DSL and completed with the DSL where appropriate.

3. Use of reasonable force

- 3.1 There are circumstances when it would be appropriate for staff to use reasonable force to safeguard interns. 'Reasonable' in these circumstances means using no more force than is needed¹⁶.

¹⁶ Further guidance can be found in Government guidance: [Use of reasonable force in colleges.](#)

Appendix 3 Dealing with allegations of child-on-child abuse

1. Child-on-child abuse

- 1.1 Children of any age can abuse other children (often referred to as child-on-child abuse) and this can happen inside and/or outside college and/or online. This includes, but is not limited to:
 - 1.1.1 bullying (including cyber-bullying and prejudice-based and discriminatory bullying);
 - 1.1.2 abuse within intimate personal relationships between peers (teenage relationship abuse);
 - 1.1.3 physical abuse such as hitting, kicking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates and / or encourages physical abuse);
 - 1.1.4 sexual violence, such as rape, assault by penetration and sexual assault (including grabbing bottoms, breasts, and genitalia under or over clothes, flicking bras, unwanted kisses or embraces) possibly with an online element which encourages sexual violence.
 - 1.1.5 sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse.
 - 1.1.6 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
 - 1.1.7 consensual and non-consensual sharing of nude and semi-nude images (also known as 'sexting' or 'youth produced sexual imagery') means the taking and sending or posting of nude or semi-nude images, videos, or live streams by young people under the age of 18 online. This could be via social media, gaming platforms, chat apps or forums. It can also involve sharing between devices offline, for example via Apple's AirDrop
 - 1.1.8 upskirting, typically involving taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm.
 - 1.1.9 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 include an online element)

2. The college 's approach to child-on-child abuse

- 2.1 Staff understand that, even if there are no reports of child-on-child abuse at the college, it does not mean it is not happening; it may be the case that it is

just not being reported. Staff understand the importance of reporting any concerns regarding child-on-child abuse to the DSL (or the DDSL in the DSL's absence).

- 2.2 Such behaviour is never accepted and should be considered as both a safeguarding issue and potentially a disciplinary one. The college will adopt a zero-tolerance approach to abuse. Downplaying certain behaviours (by, for example, dismissing sexual harassment as "banter", "having a laugh" or "part of growing up") can lead to a culture of unacceptable behaviours, an unsafe environment for children and its worst to a culture that normalises abuse.
- 2.3 All staff should challenge inappropriate behaviour between interns and anyone who suffers, witnesses or hears of abuse of any form between interns is asked to report it in accordance with this policy and / or the college's behaviour and discipline and anti-bullying policies, so that appropriate action can be taken.
- 2.4 The college has systems in place for interns to confidently report abuse and that these systems are well promoted, easily understood and easily accessible. Interns are also able to safely express their views and give feedback to staff.
- 2.5 The college ensures that its curriculum helps to educate interns about appropriate behaviour and consent and fosters healthy and respectful relationships. This is particularly addressed through Relationships and Sex Education.
- 2.6 Appropriate action will involve supporting all members of the college community who may be involved as a priority. This may require investigation by the college or other agencies. Until investigations have been undertaken and findings made, the college will work on the basis that the allegations may or may not be true and undertake careful risk assessment of the welfare of those involved to determine how best to manage the situation. This should be undertaken whether or not the incident is alleged to have occurred at college, or when the intern involved was under the college's care and whether or not the intern is under 18, as an issue which may impact intern welfare. Disciplinary action will follow separately, if appropriate.
- 2.7 Staff should be careful about the terminology used to describe the interns involved – whilst 'victim' and 'alleged perpetrator' are used in guidance these may not be appropriate terms to use in front of the young people.

3. Sexual violence and sexual harassment (SVSH)

- 3.1 Where the misconduct may constitute sexual violence¹⁷ (rape, assault by penetration, sexual assault¹⁸ or causing someone to engage in sexual activity without consent) or sexual harassment (unwanted conduct of a sexual nature), it should be reported to the DSL and will be managed in accordance with this policy. SVSH is never acceptable.

- 3.2. Whilst any report of sexual violence or sexual harassment should be taken seriously, staff are aware that it is more likely that girls will be the victims of SVSH and more likely it will be perpetrated by boys.
- 3.3 SVSH can occur between two or more children of any age or sex from primary to secondary stage. It can also occur online. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.
- 3.4 SVSH exists on a continuum and may overlap. Addressing inappropriate behaviour (even where it seems to be relatively innocuous) can be an important intervention which helps to prevent problematic or abusive behaviour in the future by setting and enforcing clear expectations of behaviour, supporting victims and encouraging them and others to speak out and facilitating targeted support for those demonstrating harmful sexual behaviour.

¹⁷ When referring to sexual violence the statutory guidance refers to sexual offences under the Sexual Offences Act 2003 as described above

¹⁸ Sexual assault covers a very wide range of behaviour so a single act of kissing someone without consent or touching someone's bottom/ breasts/genitalia without consent, can still constitute sexual assault.

- 3.5 The 2021 Ofsted report concluded that whether or not colleges are aware of reported instances of SVSH in their community, it is likely to be occurring. The college acknowledges this, and that children and young people are likely to report such matters, if at all, to people they trust. All staff are therefore trained to identify signs of abuse and on how to respond to a report.

4. Management of allegations of child-on-child SVSH

4.1 The initial report

- 4.1.1 The college recognises that it is not easy for children to tell staff about abuse.

Staff are trained in signs of abuse and required to look out for them and act upon them; and to respond to all reports of abuse, however they are reported and whether they are made by victims directly or third parties.

- 4.1.2 The college acknowledges that the initial response is incredibly important and may impact not just the management of that issue, but others of SVSH. Staff are also trained in how to receive a report. Where possible they should be accompanied by the DSL or other member of staff.

- 4.1.3 They should:

4.1.3.1 listen carefully and respectfully, reassuring the person making the report that they are being taken seriously and offer support without promising confidentiality or making a judgement about its veracity.

4.1.3.2 where possible they should ask open questions about whether intern(s) have been harmed, the nature of the harm or if they may be at risk of harm.

4.1.3.3 where there is an online element, considering the searching, screening and/or confiscation of devices and the [UKCIS Sharing nudes and semi-nudes: advice for education settings working with children and young people](#). The key consideration is for staff not to view or forward illegal images of a child;¹⁹

4.1.3.4 explain the next steps and how the report will be progressed

4.1.3.5 make a written record of the report (recording the facts as the child has presented them);

4.1.3.6 inform the DSL (or deputy) as soon as practically possible, if they are not involved in the initial report and then only share the report with those necessary to progress it.

4.1.4 DSL'S Considerations –

Reports of SVSH are often complex and require difficult professional decisions to be made. Further disclosures may follow, and the facts may be difficult to establish. These decisions are made on a case-by-case basis taking all the circumstances into account, in the best interest of the interns involved. The college 's response is led by the DSL who will always have regard to Part 5 of KCSIE in the management of the issue. The DSL will involve other staff as relevant, where reports of abuse involve a child with SEND.

4.1.5 The College will consider-

4.1.5. the victim's wishes in terms of how they want to proceed. Victims should be given as much control as is reasonably possible over decisions made about investigation and support, but their wishes will not always be determinative as the college may have to take action to protect other children.

4.1.5.2 the nature of the alleged incident (including whether it was a one-off or sustained pattern), whether a crime may have been committed and whether harmful sexual behaviour²⁰ has been displayed.

4.1.5.3 the ages and developmental stages of the children involved and any imbalance between them.

4.1.5.4 if there is an intimate personal relationship between the children

4.1.5.5 whether there are any ongoing risks to those involved

4.1.5.6 the time and location of any incident, and any action required to make the location safer.

4.1.5.7 the wider context

- 4.2 Before deciding how best to support and protect those involved the college will undertake immediate risk and needs assessments. These will be undertaken in cases of sexual violence and considered otherwise. Where appropriate, they will be discussed with those involved and their parents. This may involve suspension pending investigation. Risk and needs assessments will be recorded and kept under review in the knowledge that police investigation and criminal proceedings can take several months to conclude.
- 4.3 The college will make a proportionate response to these matters in light of the circumstances and the factors identified above and decide if any further action is appropriate.
- 4.4 The college will do all it reasonably can to protect the anonymity of children involved in sexual violence or sexual harassment. Amongst other things, this will mean carefully considering, based on the nature of the report, which staff should know about the report and any support that will be put in place for the children involved.

²⁰ [Hackett's sexual behaviours across a continuum table](#) - which helps to identify whether sexual behaviours are normal, inappropriate, problematic, abusive or violent may be helpful here.

5. Investigations and findings

- 5.1 The college will record the findings of investigations undertaken by the police and/or the CPS and if the police decide not to take any further action, it will consider whether an investigation should be undertaken or commissioned by the college to enable it to determine whether or not it is likely that the allegations are substantiated, unsubstantiated, unfounded, false or malicious. There may be circumstances where this is not appropriate, as it may prejudice a possible future investigation, for example if a victim does not currently wish to make a victim statement. In those circumstances the college should consider whether a limited investigation is appropriate. The concerns, discussions, decisions, and reasons for these should be recorded.
- 5.2 The college should continue to support those involved, with reference to the range of support options set out in Part 5 of KCSIE and should also consider

whether further referral and / or disciplinary action may be appropriate against either the perpetrator where concerns are substantiated and/or harmful sexual behaviours identified or the victim where concerns were found to be deliberately invented or malicious.

Appendix 4 Raising allegations and low-level concerns

1. Key contact information

1.1 Below is the key contact information you may need to raise an allegation or low level concern under this policy.

Reports of Safeguarding Incidents can be made via the following mechanisms.	Safeguarding@disc.ac.uk
DSL/ Head of College Caroline Dean	07702 230318 caroline.d@disc.ac.uk
DDSLs: Gemma Crockett Fran Hilton Kirsty Bradley Law Clare O'Toole Lizzie Northcote-Smith	
Chair of Governors	Dianne Ainsworth
Nominated Safeguarding Governor	Diane Ainsworth
Manchester LADO : JACKIE SHAW or Majella O'Hagan@manchester.gov.uk	0161 234 1214

2. Purpose and application

- 2.1 Purpose: the college takes safeguarding extremely seriously. It is of paramount importance that we maintain an open and transparent culture in which all concerns about adults are shared promptly, responsibly and with the right person. We recognise the importance of ensuring adults who work with, or otherwise come into contact with children and young people, do so in a way that is consistent with our values, culture and expected standards of behaviour. We also recognise that concerns may arise in several ways and from a number of sources. The purpose of this policy is to provide a framework for all concerns to be raised, recorded, and dealt with effectively by the college.
- 2.2 Application: The Policy applies to all adults working in or on behalf of the college (whether on a paid or unpaid basis), including governors, supply staff, volunteers and contractors.
- 2.3 Other adults: although this policy directly relates to those who work for the college, the college recognises that its safeguarding role extends to the protection of everyone associated with it. Should concerns be raised about people who are not Staff or interns, then they should be reported to the Head or DSL who will take appropriate action and co-operate with the relevant agencies as appropriate.
- 2.4 Statutory guidance: this policy has regard to the following statutory guidance
- 2.4.1 Keeping children safe in education (September 2023) (KCSIE). Part Four of KCSIE deals with allegations made and concerns raised about staff, supply staff, volunteers, and contractors (Staff), who are all adults working for, or on behalf of, the college. It distinguishes between two categories of concerns / allegations that can be raised about Staff. These are:
- a. concerns that do not meet the harm threshold, otherwise known as "low level concerns"; and
 - b. allegations that may meet the harm threshold.
- 2.4.2 Working together to safeguard children (July 2018, updated July 2022) (WT), which requires policies to be put in place setting out the process, including timescales for investigation and what support and advice will be available to individuals against whom allegations have been made. WT requires colleges to have regard to KCSIE to fulfil their duties in respect of safeguarding and promoting the welfare of children.

3.Key Staff duties

- 3.1 Staff behaviour: all Staff must comply with the college's Code of Conduct which sets out appropriate and expected standards of behaviour.
- 3.2 Duty to report: as a member of Staff, you must immediately follow this policy to report any concerns you have about the conduct of a member of Staff or any other adult. This includes any concern however it arises, for example behaviour you have witnessed, a concern raised with you by a colleague, intern, parent, or another adult, or as result of checks or information brought to your attention.

- 3.3 Duty to self-refer: you must refer yourself to the Head of College where, for example, you have found yourself in a situation which could be misinterpreted, which might appear compromising to others, and / or on reflection if you believe you have behaved in such a way that may fall below the standards expected of you.
- 3.4 A culture of sharing: all Staff have a positive obligation to support the college culture of openness and sharing without fear of reprisal

4. What needs to be reported?

- 4.1 Reporting all concerns: all concerns must be raised whether they are considered to be "low level" concerns or conduct which may meet the harm threshold.
- 4.2 Low level concerns: a low-level concern is any concern, no matter how small, and even if no more than a sense of unease or a "nagging doubt", that a member of Staff may have acted in a way that is inconsistent with expected professional standards and / or the staff Code of Conduct, whether inside or outside work. No concern is too small or minor to raise under this policy.
- 4.3 Concerns that meet the harm threshold: allegations that may meet the harm threshold are those that might indicate a person will pose a risk of harm if they continue to work in their present position, or in any capacity with children, for example where the individual has:
 - 4.3.1 behaved in a way that has harmed a child, or may have harmed a child; &/or
 - 4.3.2 possibly committed a criminal offence against or related to a child; and / or
 - 4.3.3 behaved towards a child or children in a way that indicates he or she would pose a risk of harm to children; and / or
 - 4.3.4 behaved or may have behaved in a way that indicates they may not be suitable to work with children. This includes behaviour that may have happened outside the college which creates a transferable risk.
- 4.4 Definition of Harm: it is important to understand the types of conduct that may be harmful to children, and to recognise that harm may not be limited to the most obvious types of physical abuse. There is no single legal definition of harm but to assist your understanding of what may amount to "harm" you should consider the following:
 - 4.4.1 the Safeguarding Vulnerable Groups Act 2006 which does not give a definition of harm, encouraging people to apply a "normal, everyday meaning";
 - 4.4.2 the Children Act 1989 defines:
 - a. "harm" as "ill-treatment or the impairment of health or development [including, for example, impairment suffered from seeing or hearing the ill-treatment of another]";
 - b. "ill-treatment" as including "sexual abuse and forms of ill treatment which are not physical";
 - c. "health" as "physical or mental health".

