

NEW CITY COLLEGE

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1. Overview of our commitment to Safeguarding

There is a safeguarding team based at each campus, which is led and supported by a Group Head of Safeguarding, who is also one of two deputy Designated Safeguarding leads. The Designated Safeguarding Lead (DSL), who is also a member of SMT, is supported by two Deputy Designated Safeguarding Leads. The Board of Governors has a nominated governor with safeguarding responsibility, who the DSL reports to in order to ensure the Board are aware of any significant safeguarding issues and how the college is dealing with them.

New City College is committed to safeguarding and creating a culture of safety throughout all the college campuses. The College takes its safeguarding and Prevent duties seriously and has robust measures in place. Safeguarding all of our students is a key priority, and we pride ourselves on ensuring that all students feel safe on campus.

Throughout these policy and procedures, reference is made to 'children and young people' or 'child protection'. These terms are used to mean those under the age of 18 or up to 24 years old if they have an Education Health and Care Plan. The College recognises that some adults are also vulnerable to abuse and therefore the policy and procedures should be applied (with appropriate adaptations) to allegations of abuse and to the protection of adults at risk. The Lord Chancellor's Department defined a vulnerable adult or an adult at risk as a person "who is or may be in need of community care services by reason of disability, age or illness; and is or may be unable to take care of, or unable to protect themselves, against significant harm or exploitation".

We also recognise that a person may be vulnerable due to their specific circumstances at any age, such as mental health or domestic abuse, but may not be vulnerable at other times or permanently; that this can be specific to a period or set of circumstances and may change. There are also students who may not fall into the category of either a 'young person' or a 'vulnerable adult' but may require safeguarding at a particular time due to a potentially dangerous situation, set of circumstances or an act/act carried out against them.

Prevent is also an integral part of safeguarding. The Prevent Strategy states 'Safeguarding vulnerable people from radicalisation is no different from safeguarding them from other forms of harm'. It aims to stop people becoming terrorists or supporting terrorism. In the same way that support is provided to people at risk of involvement with drugs, gangs, or other forms of harm, individuals vulnerable to being groomed into radicalisation should also be helped and supported. New City College's Prevent Duty Risk Assessment and action plan support this policy and aim to ensure safe, tolerant and respectful communities. Further information and guidance are also available via the CHANNEL referral process and support with this is available to staff via the DSL or Group Head of Safeguarding if required.

Safeguarding and promoting the welfare of children is defined in Keeping Children Safe in Education 2023 as:

- protecting children from maltreatment;
- preventing impairment of children's mental and physical health or development
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and
- taking action to enable all children have the best outcomes.

Keeping Children Safe in Education 2023 also defines the types and indicators of neglect and abuse as:

- Abuse (in the home, community, online or other)
- Physical abuse
- Emotional abuse
- Sexual abuse
- Neglect

Keeping Children Safe in Education 2023 refers to safeguarding against all forms of abuse and neglect but makes specific references to sexual harassment and sexual violence, child sexual exploitation (CSE), child criminal exploitation (CCE), female genital mutilation (FGM), mental health, Child on Child abuse and online abuse. 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, county lines, and radicalisation.

The College is committed to safeguarding against all aspects of abuse and neglect and expects **ALL** who works in the College to share this commitment and create a culture of vigilance, ensuring that it:

- **Provides a safe and secure environment** in which its students can learn, and staff can work
- **Promotes the welfare** and well-being of students
- **Identifies students who are suffering**, or who are likely to suffer, significant harm
- **Takes prompt and appropriate action** to protect its students
- **Provides appropriate training** for all staff
- **Provides education** for students so that they are taught when to recognise when they or others are at risk and how to get **early help** when they need it.

The College recognises the importance of considering wider environmental factors which may be a threat to a student's safety and welfare. The College assesses the risks, issues and themes in local communities and works closely with local authority safeguarding and Prevent teams when considering the wellbeing and safety of its students.

The College recognises that when a student has a social worker, it is likely to be an indicator that the student is more at risk than other students (and/or may be subject to a CIP/CIN). This may mean they are more vulnerable to further harm, as well as facing educational barriers to attendance, learning, behaviour and poor mental health. Staff are aware of the vulnerabilities of Looked After Children and Care Leavers and plan carefully to support and provide appropriate interventions for Looked After Children and Care Leavers.

Staff at New City College are 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. Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem; however, staff may notice behaviours that may be of concern. Staff are aware of how adverse childhood experiences can impact on mental health, behaviour and education. Where staff have a mental health concern that may also be a safeguarding concern they should follow the procedures outlined in this policy.

The college works closely with its partner agencies across East London boroughs, Essex and beyond, reflecting the College's catchment area. These include the local authorities, police, Local Safeguarding Children Partnerships, LADO, Channel and local Prevent Co-ordinators to ensure information is shared and referrals are made as appropriate.

The College operates in all safeguarding matters with reference and regard to the following:

- Children's Act 1989 and 2004
- The Female Genital Mutilation Act 2003
- The Domestic Abuse Act 2021
- The Forced Marriage Act 2007
- The Counter Terrorism and Security Act 2015
- Working Together to Safeguard Children 2018
- Data Protection Act 1998 and General Data Protection Regulation 2018
- Education Act 2002
- Safeguarding Vulnerable Groups Act 2006
- Equality Act 2010

- Safeguarding Children & Safer Recruitment in Education DCSF 2010
- The Education (School Teachers' Appraisal) (England) Regulations 2012
- The Children and Families Act 2014
- The Modern Day Slavery Act 2015
- Prevent Duty Guidance for Further Education Institutions in England and Wales
- The Human Rights Act 1998
- Children & Young Persons Act 2008

2016

- Vetting and Barring Guidance (ISA) – July 2016
- Children Missing Education September 2016
- Working Together to Safeguard Children February 2018
- Sexual Violence and Sexual Harassment between Children in School and Colleges

2018

- Early Years Foundation Stage (EYFS) Framework 2021
- Keeping Children Safe in Education (KCSiE) September 2022
- Keeping Children Safe in Education (KCSiE) September 2023
- Searching, Screening and confiscation: advice for schools 2023

This policy and procedures should therefore be read in conjunction with:

- Keeping Children Safe in Education (KCSiE) September 2023
- London Safeguarding Children Procedures
- The College Recruitment Policy (for Safer Recruitment)
- The College Acceptable Use Policy (for IT use)
- The College Supporting Looked After Children and Care Leavers Policy
- The College Trips Policy
- Student Codes of Conduct
- Student and Staff Disciplinary Policies
- Non-consensual Relationship Policy
- The Safer Schools Partnership Protocols (police information sharing agreement)
- The NCC Staff Code of Conduct Behaviour Policy

2. Overview of our commitment to our Prevent Duty

Under the Counter-Terrorism and Security Act 2015 the College is required to “have due regard to the need to prevent people from being drawn into terrorism, violent extremism and non-violent extremism, particularly that which can create an atmosphere conducive to terrorism and can popularise views which terrorists exploit”. The College recognises its responsibilities under the Prevent duty, facilitates Prevent training, has a Prevent Risk Assessment and Action Plan.

Prevent is one of the four elements of CONTEST, the government’s counter-terrorism strategy. The College fulfils its statutory responsibilities by ensuring that all staff recognise that protecting young people from extremism and radicalisation is a key pillar of our safeguarding duties.

PREVENT refers to specific elements of the Government's overarching Anti-Terrorist strategy defined under the section 26 (10) of the Counter Terrorism and Security Act 2015 as part of CONTEST) and includes appropriate references to Channel and other measures. The College ensures that students are taught to recognise the dangers posed by the activities of extremist groups and to understand how to recognise and protect themselves from the activities of those seeking to radicalise vulnerable young people.

The College recognises that some concerns which are identified around incidents of potential extremist behaviours will have a security dimension to them. For this reason, it is important that liaison with the police forms an early part of all investigations where concerns are raised around individuals at risk of being drawn into violent extremism. PREVENT officers from the relevant Police Force will carry out an initial assessment and, if appropriate, set up a multi-agency meeting to agree actions for supporting the individual. If it is deemed that there are

no concerns around radicalisation, other appropriate and targeted support will be considered for the individual.

This system, the CHANNEL process, is utilised where necessary and appropriate by the College to provide students with access to a confidential and voluntary process where support options can be offered.

3. Safer Recruitment and Selection

The Group is committed to the principle of safe recruitment, selection and vetting of all staff. The College pays full regard to DfE guidance on Safer Recruitment in Education. It ensures that all appropriate measures are applied in relation to everyone who works in the college, including support staff, volunteers and staff employed by contractors.

Safer recruitment practice follows government guidelines and includes scrutinising applicants, verifying identity and academic or vocational qualifications, obtaining professional and character references, checking previous employment history and ensuring that a candidate has the health and physical capacity for the job. As required by KCSIE 2023 the College informs all potential candidates that online searches will be done as part of due diligence checks ahead of their interview. This will help candidates to prepare to answer questions around public incidents from their history.

Further:

- **An Enhanced DBS Certificate** (with barred list check) is obtained for all new appointments to the college.
- **Prohibition checks** are carried out for all those involved in teaching work.
- The college maintains a **single central record** detailing a range of checks carried out on their staff.
- All new appointments to the college who have lived outside the UK are subject to additional checks as appropriate.
- The college ensures supply staff and agency staff undergo the necessary checks, depending on the agency checks conducted and the activities to be undertaken.
- Identity checks are carried out on all appointments to the college before the appointment is made.
- The selection panel will always include a member of staff who has undertaken safer recruitment training. Where there is not a panel, the person interviewing will have completed this training.

4. Existing Staff

If there are concerns about an existing staff member's suitability to work with children, the College will carry out all relevant checks as if the person were a new member of staff. Similarly, if a person working at the College moves from a post that was not regulated activity into work which is considered to be regulated activity, the relevant checks for that regulated activity will be carried out.

5. Learning about Safeguarding

The College takes all welfare concerns very seriously and encourages its students to talk to us about anything that worries them. The College will always act in the best interest of the child, young person or vulnerable adult.

All students receive information on policies, procedures and the College's safeguarding arrangements during their induction and then regularly throughout the year. Students are to be informed that there is a senior member of staff with responsibility for safeguarding, and other members of staff with safeguarding responsibility on each campus, and students know who they are.

Students are informed of whom they might talk to, both in and out of College, their right to be listened to and heard and what steps can be taken to protect them from harm. Students are also responsible for complying with all College policies and procedures that are designed to keep the College a safe and secure place in which to learn.

Through age-appropriate tutorials, teaching and learning opportunities, enrichment activities and provision of information on the student VLE, students are taught to understand safeguarding and what it means to them, recognise when they are at risk and how to get help when they need it, including keeping safe outside of college and keeping safe online.

External agencies are brought in from time to time, where appropriate, to support the delivery of certain issues and themes as these arise. The College has called on support from Prevent, CSE and the Contextualised Safeguarding teams to deliver educational workshops and help in supporting groups of students where appropriate.

Mental Health

All staff should be aware that mental health problems can be an indicator that a young person has suffered or is at risk of suffering abuse, neglect or exploitation.

We recognise that only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff are however well placed to observe student behaviour and identify those who may be experiencing a mental health problem, episode or be at risk of developing one.

If staff have a mental health concern about a young person that is also a safeguarding concern, immediate action should be taken using the College reporting system which include routes to escalate and clear referral systems. They are also aware they can make a referral directly to the College's Mental Health Advisors and Counselling Service.

If a student is in or shows signs of being in a mental health crisis, the mental health crisis guidelines should be followed, a Mental Health First Aider or member of the College's Mental Health or Counselling team should be contacted.

The college has developed a Mental Health Crisis Guideline, to better support the heighten increase in Mental Health disclosures and students at crisis point.

Online Safety

The College reviews its approach to online safety annually and its response to the growing dangers faced by young people and vulnerable adults, through safeguarding training, awareness raising activities aimed at students, the College's Acceptable Use Policy and issues as identified in KCSiE 2023.

The range of issues classified within online safety is considerable, but can be categorised into four key areas of risk:

- **Content:** being exposed to illegal, inappropriate or harmful content, for example: pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism.
- **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.

- **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
- **Commerce:** risks such as online gambling, inappropriate advertising, phishing and or financial scams.

Filtering and monitoring

All staff must receive training on the expectations, applicable roles and responsibilities in relation to filtering and monitoring. The designated safeguarding lead takes responsibility for understanding the filtering and monitoring systems and processes in place on all college devices and networks in line with guidance from the Department for Education's new filtering and monitoring standards (DfE, 2023b) and the DfE's Cyber security standards for schools and colleges (DfE 2023c).

The college has an obligation to ensure that they keep up to date with all current guidance and changes throughout the year.

The Governors should receive safeguarding training which includes an understanding of the expectations, applicable roles, and responsibilities in relation to filtering and monitoring. The Governors will consider the number of and age range of students, those who are potentially at greater risk of harm and how often they access the IT system along with the proportionality of costs versus safeguarding risks.

The Governors will review annually the standards and discuss with the Group Head of IT and service providers what needs to be done to support the college in meeting this standard.

6. Sexual Harassment and Sexual Violence

The College has a zero tolerance policy on sexual harassment in any form, including online and social media, such as 'sexting' and the sharing of unsolicited images and online bullying.

The College is committed to supporting students who experience any form of sexual violence or sexual abuse, including online abuse. All staff receive training and are sensitive to the needs of victims and respect their right to be taken seriously. In line with KCSIE (Sept 2022) victims are to be 'kept safe and never made to feel like they are creating a problem for reporting abuse, sexual violence or sexual harassment'.

Victims are to be taken seriously and not have their character or past or college record scrutinised as part of the process (sometimes known as 'victim shaming'). All reports of sexual violence, assault or rape are to be reported to the police, as they are a criminal offence and it is the police who investigate not the college.

The Department of Education updated their advice in 2021 for schools and colleges **DfE advice**. As part of our safeguarding duties, the College ensures that students are made aware that some forms of online activity such as non-consensual sharing of images and videos are not 'abusive' but are in fact illegal.

The advice of the UK Council for Internet Safety (UKCIS 2020) is followed by the College DSLs in supporting learners from the risks of online abuse and in managing incidents. The College recognises that teaching young people about safeguarding issues can prevent harm by providing them with the skills, attributes and knowledge they need to identify risks, including those encountered online and to access help when they need it.

The College actively works to minimise the risk of Child-on-Child abuse by ensuring that all learners are aware that there is a zero-tolerance approach to abuse. In no circumstances is it ever acceptable for abuse to be passed off as 'just banter' or 'just having a laugh'.

Staff are alerted to any signs of it and are confident in challenging unacceptable behaviour immediately and following the college's processes. In line with KCSIE 2023, both alleged victim and alleged perpetrator and any others involved are supported.

Procedures in the Event of a Sexual Harassment, Sexual Assault or Rape closure.

New City College has a **zero-tolerance** policy on sexual harassment in any form, including online and social media, such as 'sexting' and the sharing of unsolicited images. The College is committed to supporting learners who experience any form of sexual abuse, including online abuse. All staff are sensitive to the needs of victims and respect their right to be taken seriously. In line with KCSIE (Sept 2022) victims are to be 'kept safe and never made to feel like they are creating a problem for reporting abuse, sexual violence or sexual harassment'.

New City College takes the report of any sexual abuse, assault or rape extremely seriously and supporting students who have been the victims of such crimes quickly, effectively and sensitively is of paramount importance to the College.

Victims are to be taken seriously and not have their character, past or college record scrutinised as part of the process (sometimes known as 'victim shaming'). All reports of sexual violence, assault or rape are to be reported to the police, as they are a criminal offence, and it is the police who investigate not the college.

The College has delivered a range of training, both internal and external, to the Safeguarding Teams and to all staff to ensure that the College is well equipped to support students who experience or are the victims of sexual harassment, sexual assault and rape.

Staff have been trained to be vigilant; to look for signs and to stamp out any inappropriate behaviour such as peer on peer abuse. Students have also received awareness raising events, tutorials and sessions to enhance their understanding of consent, safe relationships and reporting sexual violence and crimes against them.

Staff are aware they must follow all reporting procedures, as set out above, including in the cases of disclosures of Sexual Assault or Rape, the additional steps of:

- Call the DSL or Deputy Principal immediately (as well as record as URGENT on MyConcern)
- The DSL or Deputy Principal must call the police immediately
- The Police must be notified of the sexual allegation
- SMT and the Safeguarding Governor must be made aware
- Support for the student (or students if Child on Child abuse) must be put in place or offered

7. Learning about Prevent

Extremism is defined in HM Government guidance as: "Vocal or active opposition to fundamental British values..." including calls for the death of specific people or groups.

British Values are defined as:

- Democracy;
- The rule of law;
- Individual liberty;
- A mutual respect and tolerance for those with different faiths and beliefs.

The College receives and delivers training to all staff to ensure that they have sufficient

knowledge of British Values, Prevent and radicalisation and exemplify British Values in their work. Lessons, interactions with students and in their general behaviours. British Values are promoted to students through teaching of the curriculum, tutorial and enrichment.

8. Partnership with Parents and Carers

The College recognises the contribution that parents and carers can make in keeping children safe. The College values effective communication and support of its safeguarding stance with parents and carers. The full policy is placed on the college website and relevant information is passed on in communications with parents during the year.

9. Students with SEND

Research shows that students with additional and special educational needs are more vulnerable to abuse, exploitation and other safeguarding concerns. This is because of the way that SEN can affect processing, cognition and communication. Students with SEN may have greater needs in the areas of comprehension, communication, weighing up information and making judgements which can leave them open to being taken advantage of.

At New City College we take the safety of our SEN students very seriously. We actively work with them, their families and caregivers to ensure that their comprehension and communication needs are met and students feel safe. Staff use appropriate communication methods and visual resources to remove barriers to disclosure and ensure that students are able to communicate their experiences or concerns. Their main programmes are planned holistically so that alongside their academic and skills development, students also progress in their ability to advocate for themselves and communicate clearly with those around them.

10. Children Missing from Education

A child missing from education is a potential indicator of abuse or neglect and such children are at risk of being victims of harm, exploitation or radicalisation. The College monitors attendance carefully and addresses poor or irregular attendance without delay.

A young person (14-16) joining the College must be placed on the admission register at the beginning of the first day of attendance. The register for any young person (14-16) on joining the College must be updated at the beginning of the first day of attendance. Should the young person not arrive at College a plan needs to be put into place and if necessary, the local authority should be informed. When a 14-16-year-old young person leaves the College before the completion of the programme of study the Local Authority must be informed immediately. In addition, it may be appropriate to highlight any contextual information concerning a vulnerable young person who is missing education, especially in the case of safeguarding concerns which must be reported.

KCSiE 2023 provides clarification that being absent, as well as missing from education can be a warning sign of a range of safeguarding concerns, including sexual abuse, sexual exploitation or child criminal exploitation.

11. Looked After Children (LACs)

The College recognises that students in the care system, looked after children (LACs) and care leavers (CLs) may potentially be more vulnerable or more at risk than other students. This may mean they are more vulnerable to further harm, as well as facing educational barriers to attendance, learning, behaviour and poor mental health. Staff are aware of the vulnerabilities of Looked After Children and Care Leavers and plan carefully to support and provide appropriate interventions for Looked After Children and Care Leavers. The College liaises with social workers, local authorities and virtual schools to monitor the progress of

Looked After Children and Care Leavers where there are concerns about their attendance, progress or safety.

12. Nursery

The college nursery has their own separate safeguarding policies, however all safeguarding incidents are reported to the NCC DSL and recorded onto MyConcern. All concerns regarding staff are reported to Hackney LADO.

Concerns are addressed in the broader safeguarding meetings as well as the nursery's own safeguarding meetings. In addition to complying to the Early Years Foundation Stage (EYFS) Framework 2021 safeguarding and welfare legislation the nurseries adhere to the requirements under the EYFS to "promote the good health of children", including oral health.

13. Criminal Convictions

All enrolling students will be asked whether they have any criminal convictions or cautions. How we ask this question has been reviewed to ensure that it does not deter students from disclosing.

An individual risk assessment will be done by the campus safeguarding lead, before a student who declares, is enrolled. The main purpose of this risk assessment is to ensure that we can put support in place for the student at college. However, we will also ensure that we assess any risks to the college community and we do reserve the right to refuse to enrol a student.

Where data sharing agreements exist with local police we will check the conviction with our police in order that we are fully informed regarding the case.

14. Staff Responsibilities

- The college recognises that social media is a powerful tool to help staff develop their careers. Staff need to be aware that their digital presence acts like an online footprint that other people, including students and ex students, can follow. Staff should take steps to protect their accounts and ensure students can't find and share their posts on social media. Staff must take steps to make sure personal accounts are private. Staff must not use their own personal social media accounts for having contact with current students or students who have left in the past 5 years. Failure to comply with this policy may result in disciplinary action being taken against them
- All members of staff must develop their understanding of the signs and indicators of abuse and their responsibility for referring any concerns.
- All new members of staff must receive a copy of the College safeguarding and child protection procedures as part of their college induction.
- All members of staff must read Keeping Children Safe in Education and sign the declaration to state that they have.
- All members of staff must read the Safeguarding Policy and Annex and/or be aware of where to use it as a reference. The safeguarding team will support staff in understanding these key documents and implementing it in their practice.
- All staff must attend relevant all staff safeguarding training.
- All staff must know how to respond to a student who discloses abuse or any safeguarding matter to them.
- All staff must know how to respond to a student who displays signs of abuse, neglect or any safeguarding matter.
- All staff must know how to report and respond to a safeguarding concern accordingly
- All staff must undertake training on the expectations, applicable roles and responsibilities in relation to filtering and monitoring

All members of staff should be prepared to identify students who may benefit from **Early Help**. Early help means providing support as soon as a problem emerges at any point in a student's life. Staff are trained and know how to respond to a student who discloses abuse or concerns.

Any student may benefit from **Early Help**, but all College staff should be particularly alert to the potential need for early help for a student who have additional vulnerabilities.

15. Procedures in the Event of a Disclosure or Suspicion of Abuse

- All complaints, allegations or suspicions must be taken seriously when there is a possibility that abuse or considerable harm may be involved.
- Staff should remain calm and reassuring throughout any discussions with a student who is disclosing abuse, suspected abuse or issues which may (or may not) be below the threshold of the definition of abuse. Students (or anyone making the disclosure) should always be reassured and believed. The disclosure should always be reported via the College reporting system, MyConcern, and if advice is required, discuss with a member of the Safeguarding team.
- Under no circumstances should staff promise confidentiality to a student who is declaring abuse or suspected abuse. Under no circumstances should staff make decisions whether the disclosure is under the threshold but should always refer to the safeguarding team. The staff member should explain that if what the student wishes to say or has said relates to the student's own safety or that of another person, then the staff member will have to inform the College's Designated Safeguarding Officer.

When dealing with a disclosure, the following communication and recording method should be followed:

Receive

- What is said
- Accept what is said
- Listen without displaying shock, disbelief or opinion

Reassure

- The student
- Acknowledge their courage in reporting it
- Do not promise confidentiality
- Remind them that they are not to blame – avoid criticism of the alleged perpetrator
- Do not promise that "Everything will be alright now" (it may not be)
- Try to remain neutral

React

- Respond to the student but do not interrogate
- Avoid leading questions but ask open ended ones
- Seek clarification from the student
- Explain the next steps

Record

- Make notes as soon as possible – on to MyConcern – during the interview if possible
- Use the student's own words – do not assume – ask e.g. "Please tell me what xxxx means?"
- Describe observable behaviour and appearance
- Do not destroy any original notes – these should be given to the senior manager or police dealing with the case

Support

- Consider what the support needs of the student are and contact the relevant safeguarding staff
- Such incidents can be stressful and time-consuming. If dealing with such a situation the member of staff should feel free to speak to a manager, a member of the Senior Management Team (SMT) or someone from HR or indeed any colleague with whom you feel comfortable discussing the matter
- If necessary, the designated safeguarding officer will take responsibility for the matter and will take all necessary actions.

** It is strongly recommended that during any disclosure interview you stick to the following line of questioning:

- Name and date of birth of student
- Date, time and location of incident
- Names of people present and relationship (if any) to student
- A description of the incident / events
- Finish by asking the student: is there anything else you wish to tell me?

Dealing with Confidentiality

Information sharing is vital in identifying and tackling all forms of abuse and neglect. The Data Protection Act 2018 and GDPR do not prevent the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of students.

However, information about safeguarding should only be shared on a need-to-know basis, as advised by the safeguarding team and/or external agencies. Any personal and sensitive data should be processed in accordance with the terms of Data Protection legislation as amended by GDPR and as interpreted in the College's data management, storage, retention and related statements.

16. Role of the Designated Safeguarding Lead (DSL) and Campus Safeguarding Lead

The Designated Safeguarding Lead (DSL) is a member of the College SMT and is the senior member of staff with overall responsibility for safeguarding in the college. The DSL ensures that the college fulfil their duties under legislation through safeguarding policies, procedures and training and the college follows legislation in line with KCSiE 2023.

There are members of staff dealing with safeguarding at each campus – Campus Senior Safeguarding Managers and Safeguarding Officers. There is also a Group Head of Safeguarding, who is one of the DDSLs. The Group Head supports the managing of serious cases, plans staff training, and coaching of safeguarding officers. The Deputy Principal of the Epping Campus is the other deputy and this DDSL harmonises safeguarding processes and protocols across the college group. Both DDSLs support the DSL in their role.

Referrals to outside agencies should be made by the Group Head of Safeguarding or DSL. However, in the event that the Campus Safeguarding Lead is not present, another Safeguarding officer, Deputy Principal or appropriate manager may make a referral. In very exceptional circumstances, a teaching staff member may make a referral to a relevant agency e.g. Multi Agency Safeguarding Hub (MASH), Police, LADO. However, this action would only be undertaken in very exceptional circumstances.

The DSL/Group Head/ DDSL/Campus Safeguarding Managers are responsible for:

- maintaining links with local multi-agency safeguarding agencies
- providing advice, guidance and training for staff on safeguarding issues

- managing agency referrals, such as those made to Social Services and Channel
- maintaining robust records of safeguarding incidents including the actions taken and when the case has been signed off as completed
- ensuring a robust system for monitoring vulnerable students
- holding the contact details of “looked after” students, social workers and the name of the Virtual School Head in the authority who has responsibility for each ‘looked after’ student.
- holding details of the local authority Personal Advisor that has been appointed to guide and support students who are care leavers and liaising with them as necessary regarding any issues of concern affecting the care leaver.
- providing an annual report to the Corporation on safeguarding issues
- ensuring the college safeguarding policy is known, understood and used appropriately
- reviewing the safeguarding policy at least annually
- ensuring all staff training and safeguarding teams training is up to date and relevant
- liaising with the nominated safeguarding governor

External organisations who provide services or activities on the college premises are expected to submit details of their safeguarding procedures whilst on site, to the DSL or Campus Safeguarding Leads, including a policy and records of DBS checks.

Staff allegation protocol - See Appendix C

17. Staff Training

All Group Designated Safeguarding Leads and Safeguarding Officers will be trained to Level 3 and Level 4 standard and will also work closely with relevant local agencies to ensure they receive up to date training on local issues, Prevent etc. Refresher training will be undertaken on a regular basis with certificated training being undertaken annually.

The Campus Safeguarding Leads, with the wider safeguarding team, will also be responsible for ensuring there are materials and regular events aimed at raising student awareness.

All staff will undertake initial safeguarding awareness training as part of induction processes on first appointment and undertake periodic updating through a variety of methods including online or e-learning, in house training and briefings.

All staff will receive training at least annually to introduce updates of this policy and will provide written confirmation that they have read Keeping Children Safe in Education, Part 1.

18. Role of the College Governing Body

The Board of Governors will receive and review recommendations submitted and determine/approve any amendments to the safeguarding policies and procedures. The Board of Governors will also note the outcomes of any serious case reviews or reports from external bodies in determining appropriate arrangements to be implemented.

A member of the Board of Governors has responsibility for governance of Safeguarding, child protection and Prevent. The DSL provides a safeguarding report to the Board of Governors, through Corporation and the Committee for Quality and Students (CQ&S).

The Board of Governors is fully committed to ensuring that:

- The Safeguarding and Prevent Policy meets statutory requirements, contains up-to-date information and references and are updated annually;

- The Prevent Duty Risk Assessment is up to date and progress against actions is monitored;
- The Safeguarding and Prevent Procedures Guidance clearly sets out what staff should do if they have a concern about a student(s);
- The College operates safe recruitment procedures and makes sure that all appropriate checks are carried out on staff and volunteers who work with children;
- The College has procedures for dealing with allegations of abuse against staff and volunteers that comply with guidance from the local authority and locally agreed inter-agency procedures:
 - Staff undertake relevant safeguarding training;
 - A member of the College's Executive Team is designated to take lead responsibility for safeguarding issues for each of the sites;
 - The most up-to-date Safeguarding and Prevent Policy, in accordance with local authority guidance and locally agreed inter-agency procedures, is available to students, parents/carers and is on the website.

19. Dealing with Allegations of Abuse: Child-on-Child Abuse

New City College actively works to minimise the risk of Child on Child abuse by ensuring that all learners are aware that there is a zero-tolerance approach to abuse. The College ensures, through regular training, that staff are alerted to any signs of it and are confident in challenging unacceptable behaviour immediately and following the college's processes. In line with KCSiE 2023, the College should ensure that both victim and perpetrator and any others involved are well supported.

The College recognises that students are vulnerable to abuse by their peers. There are many forms of Child on Child abuse. It can be physical, emotional, sexual and/or financial and can impact any young person, although the characteristics/experiences of some can be exploited by their peers, making them more vulnerable to abuse than others.

Clearly, abuse should never be tolerated or passed off as "banter" or "part of growing up" and such abuse is subject to the same child protection procedures as abuse by adults. While bullying, fighting and harassment between young people are not generally seen as child protection issues, a student's behaviour may be regarded as abusive if:

- There is a large difference in power (for example, age, size, ability, development) between the young people concerned; or
- The perpetrator has repeatedly tried to harm one or more other children; or
- There are concerns about the intention of the alleged perpetrator.

Examples of child-on-child abuse that may be regarded as safeguarding concerns include, but are not limited to, (online) bullying, gender based violence, sexual assaults and 'sexting', sharing of nudes and semi nudes without consent.

The College procedures to minimise the risk of child-on-child abuse include:

- Vigilance – staff and students have a clear method of making referrals via MyConcern and/or directly to the DSL Referrals – where concerns about students are raised by staff or other students, these are fully investigated. Where necessary, the College Disciplinary procedure is enacted.

All staff should:

- Be vigilant to child-on-child abuse and be aware of the potential uses of information technology for bullying and abusive behaviour between young people, including the sharing of nudes and semi-nudes
- Be aware of the added vulnerability of young people who have been the victims of violent crime (for example mugging), including the risk that they may respond to this by abusing younger or weaker children or young people.
- Be aware that the alleged perpetrator is likely to have considerable unmet needs as well as posing a significant risk of harm to others.

- Be aware of appropriate actions. Where concerns have been raised regarding [online] bullying, fighting and harassment, staff should follow the disciplinary procedures identified in the college's Anti Bullying and Harassment Policy. However, where there are concerns raised or disclosures of abuse (such as, but not limited to, gender-based violence, sexual harassment, sexual assaults and 'sexting').

20. Dealing with Allegations of Abuse: Students with SEND

Young people with special educational needs (SEN) and disabilities can face additional safeguarding challenges. These can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the person's disability without further exploration;
- the increased risk of abuse due to the vulnerability of the students and/or the assumption they will not be able to communicate the abuse clearly or credibly or be believed
- being more prone to peer group isolation than other students;
- the potential for students with SEN and disabilities being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs; and
- communication barriers and difficulties in overcoming these barriers.

In addition to the points raised above, addressing these additional challenges should be undertaken with the support of the SEND staff.

21. Dealing with Allegations of Abuse: Against Members of Staff

Should an allegation regarding the points below be made against a member of staff or volunteer who has for example;

- behaved in a way that has harmed a student, or may have harmed a student;
- possibly committed a criminal offence against or related to a student; or
- behaved towards a student or students in a way that indicates that they are unsuitable to work with children, young people or vulnerable adults
- behaved in a way which is an inappropriate way to talk or act in front of a child (student under 18).

Then the following procedures must be enacted;

- The member of staff or person receiving the allegation, or having the concern, will immediately inform the DSL/Group Executive Director of HR/Deputy Group Director HR
- DSL/DDSL will be appointed by HR to carry out a brief investigation. Staff member to be suspended – neutral act – investigation launched
- The DSL will if required discuss immediately, on the same working day, the content of the allegation with the Local Authority Designated Officer.
- If the allegation made to a member of staff concerns the senior post holders in the College, the member of staff will immediately inform the Chair of Governors and Safeguarding Governor, who will consult with the Local Authority Designated Officer (LADO). This must be done on the same working day.
- The College and the LADO will liaise on the process to manage the allegation. The appropriate senior leader/DSL will take the steps necessary to ensure the safety of the child/adult in question and any other person who is considered at risk (in conjunction with the DSL and/or Campus Safeguarding Lead).

22. Enquiries & Investigations

Child protection enquiries by the relevant local authority Duty and Referral Team or the Police are not to be confused with internal disciplinary enquiries by the College. In addition, the College may be able to use the outcome of external agency enquiries as part of its own procedures.

The College should seek advice from the relevant external agency as to whether to hold in abeyance its own internal enquiries while any Duty & Referral Team, LADO and/or Police investigation proceeds; to do otherwise may prejudice the investigation. Any subsequent internal enquiries should conform to existing staff disciplinary procedures.

If there is an investigation by the Police, the DSL should normally be involved and contribute to the inter-agency strategy discussions. The DSL is responsible for ensuring that the College gives every assistance to the agency's enquiries. They will ensure that appropriate confidentiality is maintained in connection with the enquiries in the interests of the member of staff about whom the allegation is made. The DSL shall advise the member of staff that s/he should consult with a representative, for example, a trade union.

In the event of an investigation against a DSL, the designated Governor is responsible for ensuring that the college gives every assistance to the agency's enquiries. They will ensure that appropriate confidentiality is maintained in connection with the enquiries in the interests of the senior post holder. The designated Governor shall advise the senior post holder that s/he should consult with a representative, for example, a trade union.

Subject to consultation with the Police and other external agencies, the DSL (or designated Governor) should:

- Inform the member of staff against whom the allegation has been made of the fact that the investigation is taking place and what the likely process will involve;
- Inform the student making the allegation that the investigation is taking place and what the likely process will involve;
- Ensure that the parents/carers of the student making the allegation have been informed that the allegation has been made and what the likely process will involve.
- Inform the Chair of Corporation (and/or the designated Governor) of the allegation and the investigation.

An appropriate member of the leadership team/DSL (or designated Governor) should keep a written record of the action taken in connection with the allegation if found to be true. This record should be retained at least until the person has reached normal retirement age or for a period of 10 years from the date of the allegation if that is longer.

Media attention during an investigation of an allegation can add to the problems for the member of staff and may even hinder an investigation. The college should manage all media relations sensitively and appropriately.

Any briefings to staff and governors should emphasise the need to avoid media coverage. Staff have some protection under the Human Rights Act 2000 with its commitment to protect "privacy". Advising the member of staff of any early indications of media interest and or coverage is essential.

23. Suspension of Staff

The LADO should be consulted regarding any suspension.

Suspension should not be automatic. In respect of staff other than senior leader/DSL, suspension should be carried out with agreement of the CEO/Group Principal, Group Executive Director of HR and DSL. In respect of the CEO/Group Principal, suspension can only be carried out by the Chair of Corporation (or in his absence the Deputy Chair).

The member of staff should be advised to seek the advice and/or assistance of his/her trade union and should be informed that they have the right to be accompanied by a friend. The member of staff should be informed that an allegation has been made and that

consideration is being given to suspension. It should be made clear that the interview is not a formal disciplinary hearing, but solely for the purpose of raising a serious matter which may lead to suspension and further investigation. The outcome of any investigation will be recorded on the relevant individual staff file, as well as any action taken.

During the interview, the member of staff should be given as much information as possible and in particular, the reasons for any proposed suspension, provided that doing so would not interfere with the investigation into the allegation. The interview is not intended to establish the member of staff's innocence or guilt, but to provide the opportunity for the member of staff to make representations about possible suspension. The member of staff should be given the opportunity to consider any information given to him/her at the meeting and prepare a response although that adjournment may be brief.

If suspension is considered necessary, the senior leader should inform the member of staff that he/she is suspended from duty. Written confirmation of the suspension, with reasons, should be dispatched as soon as possible and ideally within one working day.

If the Chair or Deputy Chair of Corporation considers that suspension of the CEO and Group Principal is necessary, s/he should be informed that they are suspended from duty. Written confirmation of the suspension, with reasons, should be dispatched as soon as possible and ideally within one working day.

Suspension may be considered at any stage of the investigation. It is a neutral, not a disciplinary act and shall be on full pay. Consideration should be given to alternatives, for example, paid leave of absence, agreement to refrain from attending work, change of, or withdrawal from, specified duties.

Suspension should only occur for a good reason (such as those 'allegations' identified in point 13 above). Suspension may also occur where the member of staff is at risk. For example, if s/he is at risk of further allegations.

Where a member of staff is suspended under safeguarding, the CEO/Group Principal and Group Executive Director of HR, or an active member of the SMT should ensure that:

- The Chair of Corporation is informed of the suspension in writing.
- Senior Staff who need to know the reason for the suspension are informed.
- The Corporation receives a report that a member of staff has been suspended pending investigation.
- A senior member of staff is a named representative to keep the member of staff who is the subject of the allegation informed of the progress of the case (ensuring any legal proceedings are not compromised). The representative should also consider what other support is appropriate for the individual. This may include support via occupational health for example.
- The parents/carers of the student making the allegation have been informed of the suspension. They should be asked to treat the information as confidential. Consideration should be given to informing the student making the allegations of the suspension.

Where the senior post holder has been suspended, the Chair or Deputy Chair of Corporation will need to take action to address the management of the College.

The suspension should remain under review in accordance with the college's Disciplinary Procedure for Staff.

Depending upon the nature of the allegation, the CEO and Group Principal, Local Principal or an appropriate member of the SMT should consider whether a statement to the general population of the College should be made, following advice, taking due regard of the need to avoid unwelcome publicity. Any statement should only be made after taking legal, human resources and public relations advice.

24. The Disciplinary Investigation (in the case of a single agency investigation)

The disciplinary investigation should be conducted in accordance with the existing Disciplinary Policy for Staff. The member of staff should be informed of the disciplinary charge against him/her and his/her entitlement to be accompanied or represented by a trade union representative or work colleague. Where the member of staff has been suspended and no disciplinary action is to be taken the suspension should be lifted immediately and arrangements made for the member of staff to return to work. It may be appropriate to offer counselling. The student making the allegation and/or their parents should be informed of the outcome of the investigation and proceedings. This should occur prior to the return to College of the member of staff (if suspended). The CEO and Group Principal, Local Principal or an appropriate member of the SMT should consider what information should be made available to the general population of the College.

25. Allegations without Foundation

False allegations may be indicative of problems of abuse elsewhere. A record should be kept and consideration given to a referral to the Local Authority Duty & Referral Team in order that other agencies may act upon the information. Following discussions with the LADO and in consultation with the Designated Safeguarding Lead and/or the designated Governor, the CEO and Group Principal or Local Principal should:

- Inform the member of staff against whom the allegation is made orally and in writing that no further disciplinary or child protection action will be taken. Consideration should be given to offering counselling/support.
- Inform the parents/carers of the alleged victim that the allegation has been made and of the outcome.
- Consider informing the parents of the young person where the allegation was made by a student other than the alleged victim.
- Prepare a report outlining the allegation giving reasons for the conclusion that the allegation has no foundation. The report should confirm that the above actions have been taken. Where allegations are found to be with 'malicious' intent, records of the allegation will be removed from the staff member/volunteer's personnel file. Any personal targets resulting from the process can be added to the staff member's file.
- Consider initiating disciplinary proceedings against the student(s) making the false allegation in line with the Anti- Bullying and Harassment Policy. Police may be asked to consider if action might be appropriate against the person responsible for the allegation, even if he or she is not a student of the College.

26. Reporting to External Agencies – the ESFA, the LADO

Where New City College or one of its partners or subcontractors, is subject to an investigation by the local authority or the Police, the Chair of Governors, Principal or DSL will email the ESFA (Education and Skills Funding Agency) and the LADO (Local Authority Designated Officer) directly at Enquiries.EFA@education.gov.uk. In this instance, the ESFA will need to know the name of the institution, the nature of the incident and confirmation that it is, or is scheduled to be, investigated by the local authority and/or the Police. Partners or subcontractors will be made aware and need to notify the college of all staff incidents or serious safeguarding concern. The college will follow their own safeguarding procedures alongside the partners or subcontractors own.

27. Use of College premises for non- college activities for children

New City College hires out some of its premises to outside organisations.

Where an allegation is made against the group or an individual from this group the college will follow its own safeguarding **policies and procedures and inform the local authority designated officer (LADO).**

All hire agreements will include safeguarding requirements as part of the lease hire agreement as a condition of uses and occupation of premises. Failure to comply with this will to termination of the agreement.

28. Record Keeping

It is important that all documents relating to an investigation are retained in a secure place, together with a written record of the outcome and, if disciplinary action is taken, details retained on the member of staff's personal and confidential file. All information obtained whilst implementing any part of this procedure will be kept strictly confidential and in accordance with Data Protection legislation on the understanding that should the Police be involved then such records may need to be disclosed by law. If a member of staff resigns before the disciplinary process is completed, he/she should be informed about the college's statutory duty to inform the Secretary of State for Education (NCTL) under the Vetting & Barring Scheme.

29. Monitoring Effectiveness

Where an allegation has been made against a member of staff, the Principal (or Designated Governor in the event of the allegation being made against the Principal), together with the senior staff member with lead responsibility should, at the conclusion of the investigation and any disciplinary procedures, consider lessons learnt and any matters arising from the case that could lead to the improvement of the college's procedures and/or policies. Consideration should also be given to the training needs of staff. This is learning lessons apply to all cases, not just those which are concluded and found to be substantiated.

30. Equalities Impact

This policy is annually reviewed by the DSL, SMT and Corporation. Safeguarding processes and/or updates are provided to the SMT and the Board of Governors (Corporation and Committee of Quality and students) half termly.

31. Whistleblowing

All staff should feel able to raise concerns about poor or unsafe practice in the College's safeguarding regime and know that such concerns will be taken seriously by the Senior Management Team.

Any concerns about how an actual or potential safeguarding case is being managed should be raised with the campus safeguarding lead in the first instance. If the person raising the concern is not satisfied with the response, they should raise the matter with the College's Designated Safeguarding Lead.

The College has a Whistleblowing Policy which can be consulted, and the NSPCC has a Whistleblowing Advice Line which offers free advice and support to professionals with concerns about how child protection issues are being handled in

their own or another organisation. Staff can call 0808 800 5000 or email help@nspcc.org.uk

32. Key Safeguarding Contacts:

The Designated Safeguarding Lead (DSL) is Narzny.Khan@ncclondon.ac.uk.

The Deputy DSL is Susan.Clark@ncclondon.ac.uk

The Group Head of Safeguarding / Deputy DSL is Miranda.Gay@ncclondon.ac.uk.

The contact details for the Campus Safeguarding Leads are on our website and intranet.

Appendix A -

NCC Visiting Speakers

Guidance on Visiting Speakers in order for the College to effectively select guests/external speakers who are inclusive and observe our values of equality and diversity, safeguarding prevent, we must occasionally reserve the right to filter inappropriate guests/external speakers.

All staff must seek permission in advance of any planned event and consent must be granted by the Deputy Principal and/or Safeguarding Teams. This notification should be received by the College at least 14 working days (2 weeks) prior to the event. This is to allow sufficient time for the respective agencies to consider the information received and supply appropriate feedback.

It may on occasion be required for us to seek guidance from or to notify the local authority, relevant agencies or the police. Analysis: Assess the risk posed by the guest / external speaker. Upon receipt of notification, the member of staff applying to host a guest speaker should conduct open-source research and decide if the individual has any potential to be inflammatory.

In order to make this initial decision the staff member should conduct research on the following:

- published material
- previous speech content
- known affiliations
- guest / speaker aliases

This information can then be passed onto the Deputy principal/ Principal and Designated safeguarding Lead (DSL).

They will:

- Consider the potential impact of the guest speaker both within the College and in the wider community (advantages versus disadvantages and any potential risks)
- Discuss with SMT and Group Head of Security and Health and Safety;
- Notify the relevant local authority, Metropolitan Police Service and/or independent advisors (if appropriate), as a matter of course;
- Notify /liaise with the DfE if appropriate.

The decision to authorise guests/external speakers and the right to revise the timescales will remain the responsibility of the Deputy Principal / Principal, CEO and the DSL.

Appendix B – KCSiE September 2023 Update

Part One - Safeguarding Information for all staff

Part Two – The management of Safeguarding

Part Three - Safer Recruitments

Part Four - Allegations made against/concerns raised in relation to teachers

Part Five - Child-on-child sexual violence and sexual harassment

KCSiE - [Keeping children safe in education - GOV.UK \(www.gov.uk\)](https://www.gov.uk)

Definitions and Terms updated from Keeping Children Safe in Education

Abuse:

A form of maltreatment of a child/young adult. Somebody may abuse or neglect a child or vulnerable adult by inflicting harm, or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or another child or children.

Physical abuse:

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

Emotional abuse:

The persistent emotional maltreatment of a child/vulnerable young adult, such as to cause severe and adverse effects on their emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying / online 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.

Sexual abuse:

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

Neglect:

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

adult's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child/ vulnerable young adult from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's/ vulnerable young adult's basic emotional needs.

Domestic Abuse:

The definition of Domestic Abuse is any incident or pattern or incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who have, or have been, intimate partners of family members regardless of gender or sexuality. The abuse can encompass but not limited to psychological, physical, sexual, financial and emotional. 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.

Sexual Violence and Sexual Harassment:

Sexual violence and sexual harassment may occur between two children of any age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing, and in all likelihood it will adversely affect their educational attainment. The College takes all victims seriously and they will be offered appropriate support.

Our college states that sexual violence and sexual harassment is not acceptable in any circumstances. Our college will manage such incidents in the same way as all safeguarding and/or criminal acts and will follow the Sexual Violence and Sexual Harassment between children in schools and colleges guidance (Department for Education 2018).

Child Criminal Exploitation (CCE):

CCE is where an individual or group take advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity, such as (a) in exchange for something the victim wants or needs, and/or (b) for the financial or other advantage of the perpetrator or facilitator and/or (c) through violence or the threat of violence. The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact; it can also occur through verbal coercion or the use of technology. CCE can involve children being used to work in cannabis factories, being coerced into moving drugs or money across the country (county lines), forced to shoplift or pickpocket, financial abuse or to threaten another young people.

County lines is a term used to describe gangs and organised crime networks involved in exporting illegal drugs into one or more areas of the country using dedicated mobile phones or other form of "deal line". Exploitation is an integral part of the county lines model with children and vulnerable adults exploited to move (and store) drugs and money.

Child Sexual Exploitation (CSE):

Child sexual exploitation is a form of child sexual abuse. It occurs when an individual or a group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. 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 through the use of technology. CSE can affect any child or young person under the age of 18 years, including 16 and 17 year-olds, who can legally consent to have sex. It 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, nudes or semi-nudes.

'Honour-Based' Abuse (HBA):

So-called "honour-based abuse" encompasses crimes which have been committed to protect or defend the honour of the family and/or the community', including Female Genital Mutilation (FGM), forced marriage and practices such as breast ironing. All forms of HBA are abuse (regardless of motivation) and should be handled and escalated as such.

Forced Marriage:

The difference between a forced marriage and an arranged marriage is important to understand. The tradition of arranged marriages has operated successfully within many communities and many countries for a very long time. A clear distinction must be made between a 'forced' and an 'arranged' marriage. In arranged marriages, the families of both spouses may take a leading role in choosing the marriage partner, but the choice of whether or not to accept the arrangement remains with the young people. In forced marriage, one or both spouses do not consent to the marriage or consent is extracted under duress.

Duress includes both physical and emotional pressure. Forced marriage is illegal and there are clear Government and legal guidelines on what to do if this is suspected.

If a student suddenly leaves college or indicates unhappiness at a planned marriage, this must be reported immediately. All such cases must be urgently referred to the Designated Safeguarding Lead (DSL) or Campus Safeguarding Leads.

In addition, since February 2023 it has also been a crime to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday, even if violence, threats or another form of coercion are not used. As with the existing forced marriage law, this applies to non-binding, unofficial 'marriages' as well as legal marriages.'

Female Genital Mutilation (FGM):

Female genital mutilation refers to procedures that intentionally alter or cause injury to the female genital organs for non-medical reasons. The practice is illegal in the UK.

FGM typically takes place between birth and around 15 years old; however, it is believed that the majority of cases happen between the ages of 5 and 8. Victims of FGM are likely to come from a community that is known to practise FGM. Staff should note that girls at risk of FGM may not yet be aware of the practice or that it may be conducted on them, so sensitivity should always be shown when approaching the subject.

Any staff member who receives a disclosure from a student that they have been the subject of FGM now has a duty to report the matter to the Police directly. The member of staff must first inform the DSL or Campus safeguarding Lead and the police should be contacted.

Prevent, Radicalisation and Extremism:

The Prevent Strategy was launched by the Government in 2007 and seeks to stop people becoming terrorists or supporting terrorism. It is also aimed at those in danger of being radicalised either from a religious or political perspective. It is the preventative strand of the Government's counter-terrorism strategy, CONTEST.

The objectives of the Prevent Strategy are to:

1. Respond to the ideological challenge of terrorism and the threat from those who promote it.
2. Prevent people from being drawn into terrorism and ensure that they are given appropriate advice and support.
3. Work with sectors and institutions where there are risks of radicalisation that we need to address.

If there are concerns that a student is becoming radicalised or involved in an organisation which could ultimately harm the student and the community, this needs to be reported to the

DSL immediately. The college has appropriate links with the borough 'Prevent' Coordinator in instances where referrals are necessary.

Note:

Forms of abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap with one another.

Sexting:

Sexting is an increasingly common activity among children and young people, where they share inappropriate or explicit images online. This can include sharing indecent images of themselves or others via mobile phones, webcams, social media and instant messaging. Although viewed by many young people as 'normal' and part of 'flirting' or showing confidence through their 'selfies', by sending an explicit image, a young person is producing and distributing child abuse images and risks being prosecuted, even if the picture is taken and shared with permission. There is an increased risk of blackmail, bullying, emotional distress and unwanted attention. Whilst it is usually more common with teenagers, sexting behaviour can impact on younger children, for example, risk taking behaviour or as result of natural curiosity. Should you have concerns about these or any other safeguarding issue, please contact the campus Safeguarding Lead or the DSL.

Appendix C

Serious Incident or Staff Allegation Checklist & Flowchart

NCC takes the reporting of staff allegations seriously and all staff allegations are dealt with the highest importance, impartially and confidentially to ensure all matters are dealt with robustly and with the best interest of all parties the following process checklist provides guidance to all staff.

All staff are reminded that they have a duty to report ALL safeguarding concerns they have, whether these include staff allegations or not, whether these seem **serious** or minor. This must be done immediately, with the safety of students of paramount importance.

All staff are reminded not to report staff-related concerns or staff allegations using the college's platform for reporting student safeguarding concerns, My Concern. Staff-related concerns and staff allegations must be reported to a senior member of the Safeguarding team and HR (DSL/Group Head of Safeguarding and HR Group Executive Director / HR Deputy **Director**).

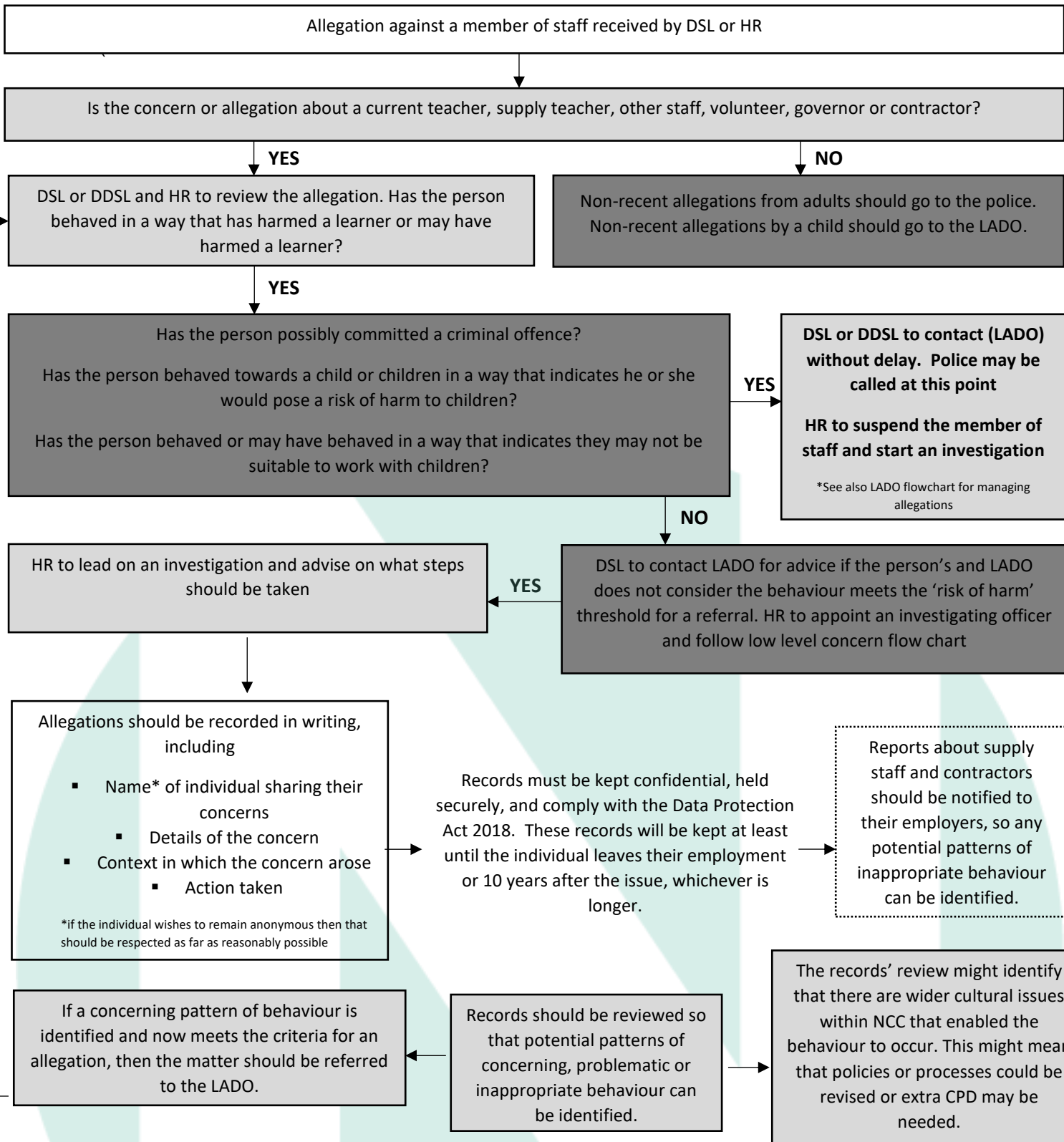
This is a "Day 1" checklist.

In the event of an allegation made involving a staff member, we must remember; It is easy to get caught up troubleshooting trying to find out the detail and making a judgement regarding a staff member or student who you know. However, it is important to step back and make sure you are following the process from Day 1.

All staff named / noted below must keep absolute confidence of the situation.

Day 1 Actions	Action	Done	Notes
1.	<p>Notify DSL and HR Group Executive Director – in their absence Group Head of Safeguarding and HR Deputy Director.</p> <ul style="list-style-type: none"> They will advise whether to notify police, LADO, CEO and whether this reaches threshold 		
2.	<p>Does the allegation involve ANY (or any suspected) safeguarding risk to students or other young people / vulnerable adults?</p> <ul style="list-style-type: none"> The decision needs to be made on whether suspension is required The decision needs to be made in conjunction with LADO as to whether this can be an internal investigation or meets threshold for police / LADO led investigation If suspension, Principal, DP and GCD notified for cover arrangements 		
3.	<p>Notify the Group Director of IT Services.</p> <ul style="list-style-type: none"> Decision if college access and IT account to be locked; equipment impounded if required. Be prepared for Police requests. 		
4.	<p>Notify the Group Executive Director of Comms - in her absence the GD Marketing & Student Recruitment.</p> <ol style="list-style-type: none"> To draft a statement in case of need To monitor media / social media 		

	c. To be aware in case of related enquiries into the Contact Centre		
5.	<p>If the allegation concerns a young person (under 18) or vulnerable student:</p> <ul style="list-style-type: none"> • Parents to be made aware by DSL, Group Head of Safeguarding or Principal, or for them to identify the most appropriate person to make this contact. 		
6.	Investigation to commence and proposed timeline to be agreed and shared with staff and union / employee rep.		



These are the definitions we should be using when recording the outcome of an investigation

Substantiated: there is sufficient evidence to prove the allegation

Malicious: there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive

False: there is sufficient evidence to disprove the allegation

Unsubstantiated: there is insufficient evidence to either prove or disprove the allegation. The term, therefore, does not imply guilt or innocence.

Unfounded: to reflect cases where there is no evidence or proper basis which supports the allegation being made

It may be determined that the allegation does not meet the harm threshold of an allegation at all in which case it should be considered a low-level concern and investigated and recorded as such.

Internal processes carry a different burden of proof, employers are required to prove on the balance of probability therefore the role of the person hearing the investigation evidence is to weigh up the likelihood of the allegation being true and genuine.

Source: NSPCC 2023

Appendix D

Police Sharing Agreements



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An MPS Safer Schools Data Sharing Agreement (DSA) must be provided and signed. The SSO and the school will share information in accordance with the data sharing agreement drawn up under Section 115 Crime and Disorder Act 1998, General Data Protection Regulation (GDPR) and current Safeguarding and Information Sharing guidance.

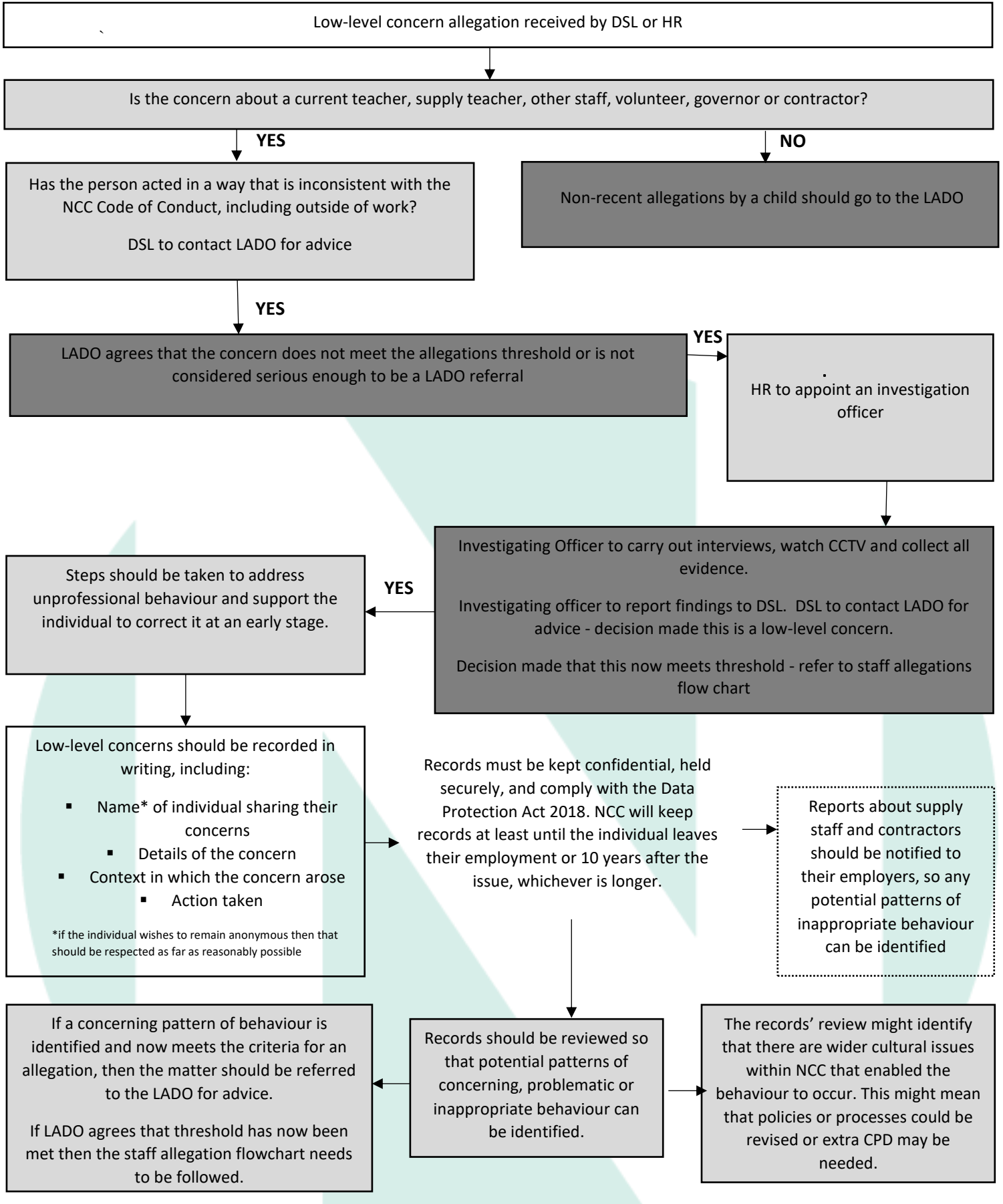
Such practice will be the subject of a Data Sharing Agreement between the school and police. Information must be shared in the interests of safeguarding and the safety of pupils, school staff, visitors or the wider school community. In particular:

1. The school and the SSO will share information of any incidents of assaults, domestic incidents, criminal damage, theft and related offences, sexual offences, offensive weapons (as defined by Section 1 Prevention of Crime Act 1953 and Section 139 Criminal Justice Act 1988 as well as firearms / ammunition, crossbows and explosive materials), drugs offences, hate crime, or harassment.
2. The school will share information of all pupil exclusions with the SSO, ie. Short term external exclusions, permanent exclusions, and the circumstances so that any potential risks can be assessed and managed.
3. The school and SSO will share information of cases of non-attendance of pupils where there are safeguarding and / or crime related concerns.
4. The school and SSO will share information of a child reported missing from home.
5. The school and SSO will share information of any other matter potentially impacting on the safety and welfare of a child, including concerns from their own observations of a child's behaviour or appearance, eg. A sudden change of behaviour that could be symptomatic of issues such as death, divorce, abuse, bullying, political radicalisation or being a victim of some other unreported crime.
6. The SSO will share information on any domestic incidents involving pupils and may affect wellbeing.

As per the SSP DSA, the SSO will create an information sharing CRIMINT when information is shared.

RELEVANT LEGISLATION
Section 115 Crime and Disorder Act 1998 (Disclosure of information): http://www.legislation.gov.uk/ukpga/1998/37/section/115
Guide to the General Data Protection Regulation: https://www.gov.uk/government/publications/guide-to-the-general-data-protection-regulation
Data protection: toolkit for schools (Guidance to support schools with data protection activity, including compliance with the General Data Protection Regulation (GDPR)): https://www.gov.uk/government/publications/data-protection-toolkit-for-schools
Information sharing (Advice for practitioners providing safeguarding services to children, young people, parents and carers): https://www.gov.uk/government/publications/safeguarding-practitioners-information-sharing-advice
Working together to safeguard children (A guide to inter-agency working to safeguard and promote the welfare of children): https://www.gov.uk/government/publications/working-together-to-safeguard-children--2
School discipline and exclusions: https://www.gov.uk/school-discipline-exclusions
Bullying at school: https://www.gov.uk/bullying-at-school
Exclusion from maintained schools, Academies and pupil referral units in England (A guide for those with legal responsibilities in relation to exclusion): https://www.gov.uk/government/publications/school-exclusion

NCC Low-Level Concern Flow Chart



What is the low-level concern?

The term 'low-level' concern does not mean that it is insignificant, it means that the behaviour towards a child does not meet the threshold set out at KCSIE (2022) paragraph 445. A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' regarding staff behaviour or conduct.