

# Safeguarding Policy 2022



This policy is available on our college website and is available on request. We also inform parents and carers about this policy when students enrol at our college.

The policy is provided to all staff (including temporary staff and volunteers) at induction alongside our Staff Code of Conduct. In addition, all staff are provided with Part One of the statutory guidance.

## [Keeping Children Safe in Education 2022](#)

This policy will be reviewed in full by the Governing Body on an annual basis. This policy was last reviewed and agreed by the Governing Body in November 2022. It is due for review in November 2023.

## Glossary

CYPVA – Children, Young People and Vulnerable Adults

CYP – Children and Young People

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## Key Safeguarding Contacts

<b>Role in school</b>	<b>Name</b>	<b>Level of Safeguarding training</b>
Principal	Craig Hodgson	Level 1
Designated Safeguarding Lead (DSL)	Lesley Morrey Ext 407	Level 4
Deputy Designated Safeguarding Lead (DDSL)	Denise Haney Ext 249/469	Level 4
Duty Deputy Designated Safeguarding Lead (DDDSL Stafford Campus)	Sarah Hicks Ext 454	Level 4
Duty Deputy Designated Safeguarding Lead (DDDSL Newcastle Campus)	Jo Lawton Ext 383	Level 4
Nominated Governor for Safeguarding	Alan Aston	Level 2
Chair of Governors	Simon Leech	Level 1
Designated person for Looked After Children	Denise Haney	Level 4
Mental Health Lead	Lesley Morrey	Level 4

## 1. Purpose and aims

The purpose of our Safeguarding policy at Newcastle & Stafford Colleges Group (**NSCG**) is to ensure that we:

- **Are committed** to developing a robust safeguarding culture of vigilance and challenge.
- **Build resilience** by raising awareness of safeguarding and CYPVA protection issues, and equipping Children and Young People and Vulnerable Adults (**CYPVA**) with the language and skills to keep themselves safe.
- **Establish a safe environment** in which CYPVA can learn and develop within an ethos of openness and where they are taught to treat each other with respect, to feel safe, to have a voice and know that they will be listened to.
- **Support vulnerable students** who have been abused, have witnessed violence towards others or may be vulnerable to abuse.
- **Prevent unsuitable people** from working with CYPVA by ensuring that we practice safe recruitment in checking the suitability of **all** school staff, supply staff and volunteers to work with our students and maintain an active, ongoing vigilance in line with the safeguarding culture.

**Our aim** is to follow the procedures set out by Staffordshire Safeguarding Children Board, [Working Together to Safeguard Children 2018](#) and [Keeping Children Safe in Education 2022](#) by **knowing** and **understanding**:

- Safeguarding and promoting the welfare of CYPVA is **everyone's** responsibility and the **voice of the CYPVA** is evident.
- **Everyone** who comes into contact with students and their families has a role to play.
- **Everyone** should ensure that their approach is **student-centred** considering, at all times, what is in the **best interests** of the student.
- By establishing a safe environment, we enable our students to learn and develop within an ethos of openness.
- **No single practitioner** can have the full picture of a student's needs and circumstances.
- If students and families are to receive the **right help at the right time, everyone** who comes into contact with them and their families has a role to play in identifying concerns, sharing information and taking prompt action.
- The importance of providing students with a balanced curriculum, broad tutorial scheme of work and meaningful enrichment activities which include topics such as: healthy relationship education, online

safety, social media risks, sexting, Child-on-Child abuse, Prevent, as well as 'abuse outside the home' – which we class as contextualised safeguarding. We also cover, County Lines and Child Criminal Exploitation (incl CSE).

- Undertaking the role to enable students at our college to have **best outcomes**.
- Ensuring that as a college we have awareness of our staff's knowledge and understanding, as well as embedding safeguarding through clear systems of communication and Continuous Professional Development (CPD) so that safeguarding is a **robust element** of our organisations practice.

At **NSCG** we strive to: -

- **Protect** CYPVA from maltreatment.
- **Prevent** impairment of our student's mental and physical health or development.
- **Ensure** that our students grow up in circumstances consistent with the provisions of safe and effective care.
- **Take action** to enable **ALL** students to have the best outcomes.

This policy provides guidance to **all** adults working within the college, whether paid or voluntary or directly employed by the college or a third party and should be read in conjunction with the documents [Keeping Children Safe in Education 2022](#) and [Working Together to Safeguard Children 2018](#).

- This policy is available on our college website and is available on request. We will also inform parents/carers about this policy when students enrol at the college.
- This policy will be reviewed in full by the Governing Body on an annual basis or sooner should legislation/guidance change.
- This policy sets out how the college's governing body discharges its statutory responsibilities relating to safeguarding and promoting the welfare of students at this college. Our policy applies to **all** staff; paid and unpaid, working in the college, including Governors.
- The policy is provided to **all** staff (including temporary staff, supply staff and volunteers) at the point of induction, alongside our Staff code of conduct policy.
- Our Governing Body, working with the senior leadership team and especially our Designated Safeguarding Lead (DSL), ensure that those staff who do not work directly with CYPVA will read at least Part 1 or Annex A (condensed version of Part 1) of the KCSiE 2022 guidance.

- All staff who work directly with our students, are provided with, and have read at least Part One of Keeping Children Safe in Education 2022.
- The school follows the Staffordshire Safeguarding Children’s Board policies and procedures. [StaffsSCB](#)

## **2. Our ethos and culture at NSCG**

At NSCG, our student’s welfare is of paramount importance to us, and we are a student centred college. Our students are reassured that they have a voice, will be listened to and what they say will be taken seriously. There are multiple ways in which students can have their say here at NSCG:

- Student Surveys
- Student Board/Student representative system
- Student Union representation at Full Governing Body
- Student Views – Questionnaire
- Annual Student Conference
- One to one tutorial system

They know that they will be supported and kept safe. They will never be given the impression that they are creating a problem by reporting abuse.

Students are encouraged to talk freely with staff and Students Services department if they are worried or concerned about something and our staff understand that a victim of any type of abuse should never feel ashamed for making a report. Their views and wishes will inform any assessment and provision for them.

We make every effort to listen to and capture the voice of students to enable us to have a clear understanding of their daily lived experiences.

We are aware that CYP (Children and Young People) 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. They may feel embarrassed, humiliated or being threatened. This could be due to vulnerability, disability and/or sexual orientation or language barriers.

This does not prevent ALL staff from having professional curiosity and speaking to the DSL if they have concerns about a student and our staff determine how best to build trusted relationships with students which facilitate this communication.

We understand our statutory duty to safeguard and promote the welfare of CYP and we maintain a professional attitude of **‘it could happen here’**

where safeguarding is concerned. We expect **ALL** staff, governors, volunteers, and visitors to share our commitment, maintaining a safe environment and a culture of vigilance.

Everyone has a responsibility to **act without delay** to protect CYPVA by reporting anything that might suggest an individual is being abused or neglected. It is our willingness to work safely and challenge inappropriate behaviours, that underpins this commitment. We work in partnership with families and other agencies to improve the outcomes for CYPVA's who are vulnerable or in need.

We have a culture of vigilance and staff are confident and competent in the timely challenge of unacceptable behaviours and these are dealt with appropriately and robustly. Staff do not accept these behaviours as 'banter', 'having a laugh' or 'part of growing up'.

## NSCG Campaign



**Our college is a safe place to be...**  
Sexual harassment and sexual violence is **not** acceptable.  
**It's not okay!  
It's not a joke!**  
**Seen it? Heard It?  
Lets talk.**  
Call NSPCC on 0800 136 663 or email [help.newcastle@nscg.ac.uk](mailto:help.newcastle@nscg.ac.uk) or call 07970737709

**Peer - on - peer abuse**  
Here at NSCG, it is important that you are in an environment where you, your peers, staff and colleagues feel safe and show respect for one another. Abuse, violence or harassment can't be tolerated.  
Peer-on-peer abuse includes, but is not limited to:  
• physical abuse, emotional abuse, bullying or intentionally causing harm  
• sexual violence such as rape, sexual assault or sexual harassment including inappropriate sexual comments, remarks and jokes  
• relationship abuse - coercive or controlling behaviour, snooping, blackmail or causing someone to engage in sexual activity without consent  
• consensual and non-consensual sharing of nude or semi-nude images and/or video  
• initiation/hazing rituals or gang related violence  
If you are concerned about yourself or someone you know, talk to your NSCG assessor or call the work-based learning safeguarding lead: [Nichola Warburton, 01782 254182](mailto:Nichola.Warburton)

**Peer - on - peer abuse**  
Information for employers  
Here at NSCG, it is important that your learners and staff are in an environment where they can feel safe and show respect for one another. Abuse, violence or harassment can't be tolerated.  
Peer-on-peer abuse includes, but is not limited to:  
• physical abuse, emotional abuse, bullying or intentionally causing harm  
• sexual violence such as rape, sexual assault or sexual harassment including inappropriate sexual comments, remarks and jokes  
• relationship abuse - coercive or controlling behaviour, snooping, blackmail or causing someone to engage in sexual activity without consent  
• consensual and non-consensual sharing of nude or semi-nude images and/or video  
• initiation/hazing rituals or gang related violence  
If you are concerned about yourself or someone you know, talk to your NSCG assessor or call the work-based learning safeguarding lead: [Nichola Warburton, 01782 254182](mailto:Nichola.Warburton)

**All** staff are encouraged to report any concerns that they have and not to see these as insignificant. On occasions, a referral is justified by a single incident, such as an injury or disclosure of abuse. However, concerns can accumulate over time and are evidenced by building a picture of harm, particularly true in cases of abuse or neglect.

We know that it is crucial that our staff pass on any concerns in a timely manner and in accordance with this policy, to allow the DSL/DDSL to build up a picture and access support at the earliest opportunity.

When dealing with safeguarding matters, we are conscious of the language and terminology that we use. We are very aware that the term using the term child, even for our under 18yr old students is not appropriate in a post 16 setting. Sometimes reference is made to a CYPVA

who has been subjected to abuse as a victim. However, not all individuals will consider themselves a victim nor will they want to be referred to in this way. We are conscious of this and when managing any incident, we will be prepared to use terminology that individuals are most comfortable with.

In guidance we will also at times use the term 'alleged perpetrator' and where appropriate 'perpetrator' and we know that these are widely used terms. However, we know that in some cases the abusive behaviour will have been harmful to the perpetrator as well and again we will be mindful of appropriate language and will decide appropriateness on a case-by-case basis.

We work closely and restoratively with our safeguarding partners with the confidence to challenge decisions and practice if deemed appropriate.

We are committed to working with parents in a positive, open, and transparent way. We ensure that all parents are treated with respect, dignity, and courtesy.

We recognise the stressful and traumatic nature of safeguarding and child protection work and support staff by providing an opportunity to talk through their anxieties with the DSL and provide regular supervision sessions for our Safeguarding and Wellbeing Officers who take on much of this traumatic work.

### **3. Legislation, guidance and links to other college policies**

This procedure has been devised with due regard for the statutory guidance from the DfE [Keeping Children Safe in Education 2022](#) (KCSiE) and this document is read alongside;

- [Working Together to Safeguard Children 2018](#)
- [Staffordshire Safeguarding Children Board Procedures](#)
- [What to do if you are Worried a CYPVA is being Abused-Advice for Practitioners](#)
- [Behaviour in Schools - Advice for headteachers and school staff](#)
- Guidance for Safer Working Practices for those working with Children and young people in educational settings
- Whistleblowing Policy
- Staff Code of Conduct

(You will find all policies and procedures on the first page of the NSCG staff portal page.



College  
Policies



#### **4. The role of all staff in keeping children safe**

**All** staff have read and have a good understanding of **at least part 1** of [Keeping Children Safe in Education 2022](#) and are aware of the safeguarding link to other policies relating to their daily practice. This is completed on induction to the college and regular updates appear in our Core Brief as required.

**All** staff receive appropriate safeguarding training (including online safety) at induction and this training is regularly updated. In addition, **all** staff receive safeguarding and child protection updates as required, to continue to provide our staff with relevant skills and knowledge to safeguard students effectively.

**All** staff know who the DSL/DDSL is, and know that as well as being the expert in this field, they are there to support staff, volunteers, and Governing body.

**All** staff are aware of their responsibility to provide a safe environment in which students can learn.

**All** staff are aware of indicators of abuse and neglect and understand that students can be at risk of harm inside and outside of the college, inside and outside of home and online. Staff are confident in exercising **professional curiosity** and understand that knowing what to look for is vital for the early identification of abuse and neglect to identify cases of individuals who may be in need of our help or protection. They are aware that 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.

**All** staff, but especially the DSL/DDSL consider whether students are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and CYPVA 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.

**All** staff are aware that technology is a significant component in many safeguarding and wellbeing issues and that CYPVA are at risk of abuse and other risks online as well as face to face. They know that in many cases abuse and other risks will take place concurrently both online and offline. CYPVA can also abuse other CYPVA online, this can take the form of abusive, harassing, and misogynistic/misandrist 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.

**All** staff know what to do if a student tells them they are being abused, exploited, or neglected. Staff know how to maintain an appropriate level of confidentiality by only involving those who need to be involved, such as the DSL/DDSL and local authority children's social care. Staff never promise a student that they will not tell anyone about a report of abuse, as this may ultimately not be in the best interests of the student.

**All** staff know how to reassure victims that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting **any** form of abuse and/or neglect. Nor should a victim ever be made to feel ashamed for making a report.

**All** safeguarding staff are aware of the early help process and understand their role in it and are confident to identify and support individuals who may benefit from early help, effectively giving them and their families the right help at the right time.

**All** of the safeguarding team are aware of how to accept concerns from staff and make a referral to children's social care, especially section 17 (Children in need) and section 47 (a CYPVA suffering, or likely to suffer, significant harm) that may follow a referral, along with their potential role in such assessments.

**All** staff understand their responsibility to report concerns about the behaviour of any adult in our college and know that they will be listened to and taken seriously.

**All** staff understand their responsibility to escalate concerns and 'press for reconsideration' if they believe a student's needs remain unmet or if the student is failing to thrive and in need or if the student is at risk of harm.

In all cases, if our staff are unsure, they know that they should always speak to the DSL/DDSL.

## **5. Roles and responsibilities of Designated Safeguarding Lead (DSL) and Deputy Designated Safeguarding Lead(s)(DDSL)**

For full details of the DSL/DDSL roles and responsibilities please refer to Part 2 & Annex C of Keeping Children safe in education 2022.

Our DSL/DDSL(s) have received the appropriate safeguarding training to provide them with an understanding of their role and the knowledge and skills to carry it out. Our DDSL(s) are trained to the same level as the DSL. Training received also supports their knowledge of the processes,

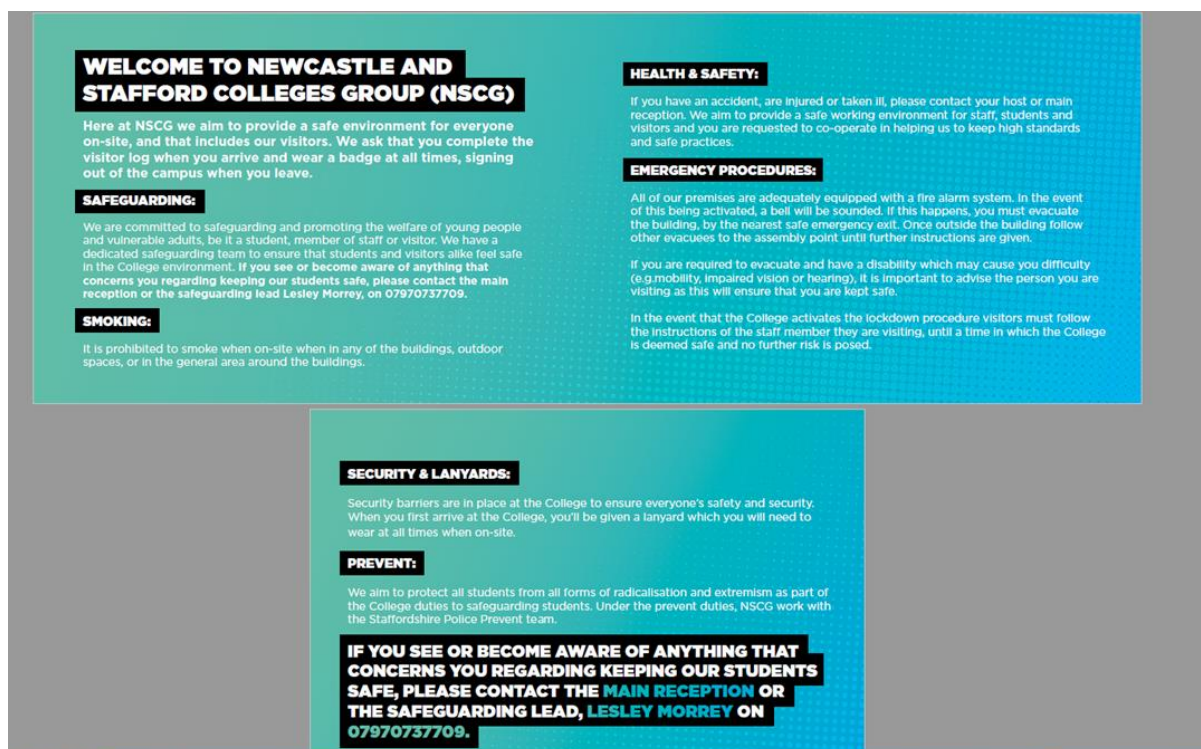
procedures, and responsibilities of other agencies, particularly children's social care in line with [Working Together to Safeguard Children 2018](#). This training is updated at least every 2 years and in addition to this they regularly (at least annually) refresh and update their knowledge and skills. The DSL is given **additional** time, funding, training, resources, and support needed to carry out the role effectively. NSCG DSL and DDSL attend Education Safeguarding DSL Briefings where they meet other DSL's and share best practice. At NSCG half termly DSL meetings are held to discuss and review ongoing cases.

Our DSL Lesley Morrey takes the **lead responsibility** for safeguarding and child protection (including online safety), and this is explicit in their job description. The DSL/DDSL is available for staff in the college to discuss any safeguarding concerns. The DSL can delegate activities to the DDSL(s); however, the ultimate responsibility remains with them, and this lead responsibility is not delegated. In the absence of the DSL the DDSL and the DDDSL will take a lead on safeguarding with clear direction from the Senior Leadership Team.

The DSL acts as a source of support, advice, and expertise for staff. Risk assessments/safety plans will be completed as required and should, where appropriate, involve other agencies, these are reviewed regularly and shared appropriately.

Our DSL with the support from the college's HR department, maintains robust systems to monitor and record training of **all** staff and update and refresher time scales are evident within the training record. Training is delivered in-line with SSCB and KCSIE 2022. This will include bulletins, briefings, and CP day training as well as external events attended.

The DSL ensures that **all** staff and regular visitors have appropriate safeguarding training and information to equip them for their role.



This includes training on how to recognise indicators of concern, how to respond to a disclosure from a student and how to record and report this information accurately. The DSL ensures systems are in place to induct new staff/governors are robust and monitored and any non-compliance shared with Senior Leadership Team/Governing body.

The DSL monitors the case management through regular meetings with the safeguarding teams and the DDSL and DDDSL's and monitoring of confidential comments Level 3 on ProMonitor. This is to ensure the college record concerns about students, ensuring that the quality of information is accurate, proportionate, timely and assessment/referrals are made appropriately. The recording and storing of information are kept in-line with the [Data Protection Act 2018](#) and General Data Protection. The safeguarding and child protection records are kept in a secure location, away from academic records and there is a clear recording process of transfer, in or out.

The DSL will pass on any safeguarding concerns and the safeguarding file if there is one, to the receiving training establishment or Staffordshire County Council if necessary.

All concerns, discussions and decisions made, and the reasons for those decisions, are recorded within the safeguarding database.

The DSL/DDSL monitors the quality of safeguarding files through auditing case files regularly. Appropriate and regular supervision takes place with

the DDSL and may be extended to other members of staff if we deem this appropriate.

Safeguarding staff will refer cases of suspected abuse to the local authority children's social care, as required, and support other staff to make these referrals. We understand the importance of attending case conferences and core group meetings as well as Child in Need meetings.

DSL/DDSL will liaise with all staff (e.g., support staff, SEN staff and Mental Health Leads) on matters of safety and safeguarding and when deciding whether to make a referral by liaising with relevant agencies.

The DSL/DDSL will represent the college at child protection conferences and core group meetings as required and will be the expert within our setting to support staff in liaising with other agencies, making assessments and any referrals. Any staff member may be required to be part of strategy discussions with other interagency meetings and contribute to the assessment of CYPVA. The DSL/DDSL will notify children's social care if a student with a child protection plan is absent for more than two days without explanation.

The DSL/DDSL helps to promote educational outcomes by sharing appropriate information about the welfare, safeguarding and child protection issues that students (including individuals with or who have previously had a Social Worker) are experiencing, or have experienced, with teaching staff and school leadership staff. Their role could include, ensuring that the college and their staff, know who these individuals are, understand their academic progress and attainment and maintain a culture of high aspirations for this cohort; supporting teaching staff to identify the challenges that students in this group might face and the additional academic support and adjustments that they could make to best support these students.

The DSL has a good understanding of the community the college serves, the risks and its resilience. This is achieved through strong partnership working and networking in local Authority meetings e.g. Joint Operations Group Meeting, Town Partnership Meetings, Prevent Boards.

## **6. Our Governing Body**

At **NSCG** our Governing Body have a strategic leadership responsibility for safeguarding arrangements, and they **must** ensure that we comply with our duties under legislation. They **must** have regard to this guidance in ensuring policies, procedures and training are effective and comply with the law at all times. See Part 2 [Keeping Children Safe in Education 2022](#).

The Director of Student Engagement & Partnerships ensures that the policies and procedures, adopted by the governing bodies and proprietors (particularly those concerning referrals of cases of suspected abuse and

neglect), are understood, and followed by all staff. These policies are transparent, clear, and easy to understand for staff, students and their parents/carers.

The Governing Body ensure that **all** governors and trustees receive appropriate safeguarding (including online) training at induction. This will equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place here are effective and support the delivery of a robust whole college approach to safeguarding and this training is regularly updated.

The Governing body and proprietors are aware of their obligations under the [Human Rights Act 1998](#), the [Equality Act 2010](#), (including the [Technical Guidance on the Public Sector Equality Duty](#)), and their local multi-agency safeguarding arrangements. Further guidance is found in Pg 24-26 Para 82-93 [Keeping Children Safe in Education 2022](#) & [Equality Act 2010-Advice for schools](#)

The Governing body facilitate a whole college approach to safeguarding involving everyone in college, ensuring that safeguarding is at the forefront and underpins all relevant aspects of process and policy development. These systems, processes and policies operate with the **best interests** of our students at the heart of what we do.

The Governing body has appointed the Designated Safeguarding Lead - Lesley Morrey (DSL) who takes **lead responsibility** for safeguarding and child protection (including online safety). This is explicit in their job description, and they ensure that the DSL understands their responsibility in leading safeguarding across the college. They also ensure that the DSL is given additional time, funding, training, resources, and support needed to carry out the role effectively. See Annex C [Keeping Children Safe in Education 2022](#)

The Governing Body has also identified a Deputy Designated Safeguarding Lead(s) Denise Haney (DDSL), who is trained to the same safeguarding standard as the DSL.

The Governing body and proprietors ensure that students are taught about how to keep themselves and others safe, including online. It is recognised that effective education will be tailored to the specific needs and vulnerabilities of individual students, including students who are victims of abuse, and CYPVA with special educational needs or disabilities. There is an expectation that all teaching staff manage behaviour effectively to ensure a good and safe educational environment and requires them to have a clear understanding of the needs of all students.

The following is a resource: - [Teaching about relationships, sex and health](#) and there are more listed in Annex B KCSiE including [Harmful online challenges and online hoaxes](#)



Our Governing Body, whilst considering their responsibility to safeguard and promote the welfare of students and provide them with a safe environment in which to learn, are doing all that they reasonably can to limit students' exposure to the online risks from the college's IT system. As part of this process, our governing body and proprietors ensure that our school has appropriate filters and monitoring systems in place and regularly review their effectiveness.

**FORTINET**. The firewall system is Fortinet -Fortigate 600D

They ensure that the leadership team and relevant staff have an awareness and understanding of the provisions in place and manage them effectively and know how to escalate concerns when identified. Governing bodies and proprietors consider the age range of our CYP, the number of students, how and how often they access the IT system and the proportionality of costs verses safeguarding risks.

The Governing Body will ensure compliance with the completion of the Section 175/157 audit return to the Local Authority and that any areas of concern in safeguarding are identified and a safeguarding action plan is developed.

Our college also completes an internal safeguarding audit and is also part of a wider audit programme of student which includes safeguarding and Prevent as part of an audit schedule throughout the academic year.

They also ensure that the school contributes to inter-agency practice in line with [Working Together to Safeguard Children 2018](#)

The Governing Body ensure that those involved with the recruitment and employment of staff to work with CYPVA have received safer recruitment training and are compliant with safer recruitment procedures. This includes the requirement for appropriate checks to be carried out in line with national guidance. See Part 3 Safer Recruitment [Keeping Children Safe in Education 2022](#)

Our Governing Body/Principal have ensured that there is a current whistleblowing policy and staff are aware of this policy and understand its content. We have a culture where staff can raise concerns about poor or unsafe practice and such concerns are addressed professionally and sensitively in accordance with agreed whistleblowing procedures.

*NSCG Whistleblowing Policy to Safeguard and Promote the Welfare of Children*

Further guidance on [whistleblowing](#) is available here and the NSPCC whistleblowing helpline is available for staff who do not feel able to raise

concerns regarding safeguarding failures internally. Staff can call on 0800 028 0285 and the line is available from 8am to 8pm, Monday to Friday. Email: [help@nspcc.org.uk](mailto:help@nspcc.org.uk)

At **NSCG** we are attachment aware, and trauma informed and take a relational based approach to supporting our most vulnerable students and will work restoratively with CYPVA to improve their outcomes. The DSL and DDSL have undertaken awareness training around this topic.

We are aware of the additional duties of the virtual school headteacher extended in June 2021, to include a non-statutory responsibility for the strategic oversight of the educational attendance, attainment, and progress of students with a social worker. We understand the role that we play in improving outcomes for CYPVA with a social worker.

[Virtual Headteacher Role-children with a social worker](#)

## **7. Working with parents/carers.**

At **NSCG** we are committed to working in partnership with parents/carers to safeguard and promote the welfare of the students, and to support them to understand our statutory responsibilities in this area.

When new students join our college, parents/carers will be informed that we have a safeguarding policy. A copy will be provided to parents on request and is available on the college website. Parents/carers will be informed of our legal duty to assist our safeguarding colleagues in other agencies with child protection enquiries and what happens should we have cause to make a referral to the relevant local authority or other agencies.

We respect parents' rights to privacy and confidentiality and will not share sensitive information unless we have permission, or if it is necessary to do so to safeguard an individual from harm.

We will seek to share with parents/carers any concerns we may have about their young person before making a referral, unless to do so may place them at increased risk of harm. A lack of parental engagement or agreement regarding the concerns the college has about an individual will not prevent the DSL from making a referral to the local authority in those circumstances and where it is appropriate to do so.

To keep students safe and provide appropriate care for them, the college requires parents to provide accurate and up to date information regarding:

- Full names and contact details of NOK.



- Full names and contact details of all persons with parental responsibility (if different from above).
- Emergency contact details (if different from above)
- Any legal or criminal changes which effects parental responsibility e.g., bail conditions, court orders, Special Guardianship orders, child arrangement orders etc

The college will retain this information on the students section of Prosolution. The college will only share information about students with adults identified as the next of kin

We recognise that we are likely to be in regular contact with parents and carers. We will use these communications to reinforce the importance of young people being safe online and parents/carers are likely to find it helpful to understand what systems the college use to filter and monitor online use.

At **NSCG** we update parents about safeguarding through website/text messaging (attendance)/parent and open events.

## **8. Staffordshire Early Help**

Any CYPVA may benefit from early help, but **all** staff are particularly alert to the potential need for early help for a CYPVA who: -

- is disabled or has certain health conditions and has specific additional needs
- has special educational needs (whether or not they have a statutory Education, Health and Care Plan)
- has a mental health need
- is a young carer
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines
- is frequently missing/goes missing from school, care or from home.
- is at risk of modern slavery, trafficking, sexual or criminal exploitation.
- is at risk of being radicalised or exploited
- has a family member in prison, or is affected by parental offending
- is in a family circumstance presenting challenges for the student, such as drug or alcohol misuse, adult mental health issues and domestic abuse.
- is misusing alcohol or other drugs themselves.
- has returned home to their family from care
- is at risk of 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage
- is a privately fostered child

- is persistently absent from education, including persistent absences for part of the college timetable

The DSL ensures that **all** staff are aware of the early help process and understand their role in it. This includes identifying emerging problems, liaising with the DSL/DDSL, sharing information with other professionals to support early identification and assessment and, in some cases, acting as the **lead professional** in undertaking an early help assessment.

Guidance documents can be accessed at the following links:

- [Early Help - SSCB](#)
- [Threshold Document - StaffsSCB](#)

## **9. What happens if a referral is deemed necessary to escalate beyond Early Help.**

### **Child in Need (Section 17)**

If the DSL considers that the welfare concerns indicate that a Child in Need referral is appropriate, they will speak with parents/CYP and obtain their consent for referral to Staffordshire Childrens Advice and Support (SCAS), or the appropriate social care team if a different authority, to request an assessment. If parents refuse to give consent, but the individual's needs are not being met, the DSL will discuss these issues with SCAS. Appropriate college staff will attend Child in Need (CIN) meetings convened by Children's Social Care when children are deemed to require Section 17 services.

### **Child Protection (Section 47)**

If the local authority has reasonable cause to suspect that a child is suffering, or likely to suffer, significant harm, they make enquiries under Section 47 to enable them to decide whether they should take any action to safeguard and promote their welfare. This duty also applies if they are subject to an emergency protection order (under S44 of the Children Act 1989) or in police protective custody (under S46 of the Children Act 1989).

Children's Services will convene an Initial Child Protection Conference (ICPC) once a child protection enquiry under Section 47 of the Children Act 1989 has been undertaken and the child is judged to be at continuing risk of significant harm. A review conference (RCPC) will take place once they have been made the subject of a Child Protection Plan to monitor the safety of the individual and the required reduction in risk. Between conferences regular meetings of a core group will take place to monitor the progress of the child protection plan.

The DSL/DDSL (sometimes other staff members) will attend the child protection conference on behalf of the college. The person attending will have as much relevant and up to date information about the student as possible. They will contribute to a recommendation on the risks/protective factors for the family from their information and a view on the need for a child protection plan. We understand the importance of our attendance and contribution at these conferences and whether we attend or not we know that there is a requirement to complete a report containing these contributions.

Child protection conferences can be upsetting for parents. We will work in an open, honest, and transparent way with any parent whose young person has been referred to SCAS or is subject to a child protection plan. Our responsibility is to promote the protection and welfare of all students and our aim is to achieve this in partnership with our parents/carers, wherever possible.

## **10. Escalation process**

Staffordshire Safeguarding Children Board expects members of staff working directly with families to share information appropriately and work to plans agreed in all relevant forums. Good practice includes the expectation that constructive challenge amongst colleagues within agencies, and between agencies, provides a healthy approach to the work.

This process will be kept as simple as possible and the aim will be to resolve difficulties at a professional practitioner level, wherever possible and always in a restorative way. We recognise that differences in status and experience may affect the confidence of some workers to pursue this course of action, and support should be sought from the DSL/DDSL.

If we believe that concerns regarding a student are not being addressed and outcomes are not improving, we understand the expectations that we will escalate our concerns in line with the [SSCB Escalation policy 2022](#), until a satisfactory conclusion is reached.

## **11. A safer college culture**

### **Safer Recruitment and Selection**

At **NSCG** we pay full regard to 'Keeping Children Safe in Education 2022'. Our Safer Recruitment and selection practice includes scrutinising applicants, verifying identity, checking 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. It also includes undertaking interviews and appropriate checks including criminal record checks (DBS

checks), barred list checks, prohibition checks whether they are known to the police and/or social care, if they have been disqualified from providing childcare and any relevant overseas information. Evidence of these checks is recorded on our Single Central Record.

Staff who have lived or worked outside the UK **will** undergo the same checks as all other staff, even if they have never been to the UK. We will ensure that any other appropriate checks are carried out so that any relevant events that occurred outside the UK can be considered. These checks could include criminal records checks for overseas applicants and for teaching positions obtaining a letter (via the applicant) from the professional regulating authority in the country (or countries) in which the applicant has worked confirming that they have not imposed any sanctions or restrictions, and or that they are aware of any reason why they may be unsuitable to work with CYPVA.

Guidance: [Application process for criminal records checks overseas](#)  
[Regulated professions database](#)  
[UK Centre for Professional Qualifications](#)

One of the trained safer recruitment staff will be involved in **all** staff and volunteer recruitment processes and sit on the recruitment panel.

## **Induction**

All staff will be made aware of the systems we have in place to support safeguarding. These are explained as part of staff induction including:-

- The Safeguarding policy.
- The disciplinary policy and procedure .
- Child on Child Abuse Policy
- The staff code of conduct.
- The role of the DSL (including the identity of the DSL and any deputies).
- Part one of KCSIE 2022.
- Safer working practice guidance for those working with children and young people in education settings. (All staff and volunteers are expected to carry out their work in accordance with this guidance and will be made aware that failure to do so could lead to disciplinary action.)

No visitors will be left unsupervised with CYPVA or out of sight of the NSCG member of staff unless partnership arrangements/agreements are in place. It is the responsibility of the member of staff to ensure this is the case.

## **Use of reasonable force**

There are circumstances when it is appropriate for staff in college to use reasonable force to safeguard children and young people. The term 'reasonable force' covers the broad range of actions used by staff that involves a degree of physical contact to control or restrain an individual. This can range from guiding a student to safety by the arm, to more extreme circumstances such as breaking up a fight or where a young person needs to be restrained to prevent violence or injury.

'Reasonable' in these circumstances means 'using no more force than is needed'. The use of force may involve either passive physical contact, such as standing between students or blocking a student's path, or active physical contact such as leading a student by the arm out of the teaching environment. Departmental advice for schools is available [here](#)

When using reasonable force in response to risks presented by incidents involving students including any with SEN or disabilities, or with medical conditions, staff should consider the risks carefully and be guided by the NSCG

By planning positive and proactive behaviour support, for instance by drawing up individual behaviour plans for more vulnerable students and agreeing them with parents and carers, we will reduce the occurrence of challenging behaviour and the need to use reasonable force.

## **12. Keeping Children safe in education 2022-Specific Safeguarding issues.**

**All** staff have an awareness of the following safeguarding issues through regular training and briefings. Staff are aware that these behaviours can make CYP vulnerable and put them in danger and that often these issues overlap. Please read and refer to Appendix 2 for additional information and guidance on the below topics.

- Abuse (incl Physical/Emotional/Sexual/Neglect) Annex 1
- Behaviours linked to safeguarding issues
- Bullying including cyberbullying
- Child on child abuse (inc sexual violence and sexual harassment/sexting-sharing of nude/semi-nude images & upskirting)
- Children and the court system
- Children missing from education
- Child missing from home or care
- Child Criminal Exploitation (CCE)
- Child Sexual Exploitation (CSE)
- County Lines

- Domestic abuse
- Drugs
- Fabricated or induced illness
- Faith abuse
- Female genital mutilation (FGM)
- Forced marriage
- Gangs and youth violence
- Gender-based violence/violence against women and girls (VAWG)
- Homelessness
- Mental health
- Online safety
- Private fostering
- Preventing radicalisation
- Prevent Duty and Channel
- Serious violence
- Trafficking

For further information, advice and guidance on these issues please see Annex 2 of this document.

### **13. Children potentially at greater risk of harm**

All CYPVA should be protected however our staff and Governing Body recognise that some groups of students are potentially at greater risk of harm than others. This list is not exhaustive but highlights some of these groups: -

- Children who need a social worker (Child in Need & Child Protection)
- Children missing from education
- Elective Home Education (EHE)
- Children requiring mental health support
- Looked after children and previously looked after children
- Children with special educational needs & disabilities/health issues
- Children who are lesbian, gay, bi or trans (LGBT)

Paragraphs 170-204 of Keeping Children Safe 2022 explain in more detail about these groups. We support these groups by having: -

- **Vigilance:** to have adults notice when things are troubling them
- **Understanding and action:** to be heard and understood; and to have that understanding acted upon.
- **Stability:** to be able to develop an ongoing stable relationship of trust with those helping them.
- **Respect:** to be treated with the expectation that they are competent, rather than not.

- **Information and engagement:** to be informed about and involved in procedures, decisions, concerns and plans.
- **Explanation:** to be informed of the outcome of assessments, decisions and how they have been reached, positive or negative.
- **Support:** to be provided with support in their own right as well as a member of their family.
- **Advocacy:** to be provided with advocacy, to assist them in putting forward their views.

#### **14. Educational visitors to College.**

We will undertake risk assessments and use professional judgement and experience when deciding whether to seek an enhanced DBS for any volunteer not engaging in regulated activity. In doing so we will consider:

- What we know about the individual/company, including formal and informal information offered by staff, parents, other establishments or volunteers.
- Whether the individual/company has other employment or undertakes voluntary activities where references can be advised, and suitability recorded.
- Whether the role is eligible for an enhanced DBS check
- We will clearly have decided the level of supervision required through risk assessment – the supervision will be “reasonable in all the circumstances to ensure the protection of children” as stated in KCSIE 2022

We have clear visitor’s procedure that enables us to introduce professionals to extend knowledge and curriculum.

#### **15. Allegations made against/concerns raised in relation to staff, volunteers, and contractors**

Our aim is to provide a safe and supportive environment securing wellbeing and best possible outcomes for the students at our college. We take all possible steps to safeguard our students and to ensure that the adults who work at **NSCG** are safe to work with them. However, we do recognise that sometimes the behaviour of adults may lead to an allegation of abuse being made.

The Governing Body ensures that there are procedures in place for dealing with the two sections covering two levels (see below) of concern and/or allegations against staff members, supply staff, volunteers, and contractors.

- Allegations that **may** meet the harms threshold.

- Allegation/concerns that do not meet the harms threshold, referred to for the purposes of this guidance as '**low level concerns**'.

### Allegations that **may** meet the harms threshold

We have an good understanding and give due regard to Part 4 of [Keeping Children Safe in Education 2022](#) guidance and [SSCB Allegations of abuse made against a person working with children](#) where it is alleged that anyone working in our education setting providing education for children under 18 years of age, including supply teachers, volunteers and contractors has:

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

This relates to members of staff, supply staff, volunteers, and contractors, who are currently working in any education setting, regardless of whether the school or college is where the alleged abuse took place. Allegations against a member of staff who is no longer working and/or historical allegations of abuse will be referred to the police.

We understand that if we are not the employer of an individual, we still have responsibility to ensure allegations are dealt with appropriately. In no circumstances will we decide to cease to use a supply teacher due to safeguarding concerns, without finding out the facts and liaising with the LADO to determine a suitable outcome. Our Governing body/Principal will discuss with the agency whether it is appropriate to suspend the member of staff, or redeploy them to another part of the college, whilst they carry out their investigation.

If an allegation is made or information is received about an adult who works at our college which indicates that they may be unsuitable to work with CYPVA's, the member of staff receiving the information should inform the Principal immediately. Should an allegation be made against the Principal, this will be reported to the Chair of the Governing Body. If neither the Principal nor Chair of Governing Body is contactable on that day, the information must be passed to and dealt with by either the member of staff acting as Principal or the Vice Chair of Governors.

The Principal or Chair of Governors will seek advice from the Local Authority Designated Officer (LADO) within one working day. No member



of staff or the governing body will undertake further investigations before receiving advice from the LADO.

Allegation/concerns that do not meet the harms threshold – referred to for the purposes of this guidance as ‘low level concerns’.

At **NSCG** we promote an open and transparent culture in which **all** concerns about adults are dealt with promptly and appropriately. Creating this culture enables us to identify inappropriate, problematic, or concerning behaviour early, minimising the risk of abuse and ensuring that adults who work in or on behalf of our college are clear about professional boundaries and act within them in accordance with our ethos and values.

What is a low-level concern?

Low level does not mean that it is insignificant. It is any concern, no matter how small, and even if no more than causing a sense of unease or nagging doubt that an adult working in or on behalf of the school may have acted in a way that is: -

- inconsistent with the staff code of conduct, including inappropriate conduct outside of work and
- does not meet the harm threshold or is otherwise not serious enough to consider a referral to the LADO.

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

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

Sharing low-level concerns

We understand how crucial it is that all low-level concerns are shared responsibly with the right person and recorded and dealt with appropriately. Ensuring they are dealt with effectively will also protect those working in or on behalf of our setting from potential false allegations or misunderstandings. If we are in any doubt as to whether information shared about a member of our staff as a low-level concern in fact meets the harms threshold we will consult with the LADO.

Any member of staff or volunteer who does not feel confident to raise their concerns with the Principal or Chair of Governors knows to contact the LADO on 0300 111 8007.

The school has a legal duty to refer to the Disclosure and Barring Service (DBS) anyone who has harmed, or poses a risk of harm, to a CYPVA, or if there is reason to believe the member of staff has committed one of a number of listed offences, and who has been removed from working (paid or unpaid) in regulated activity or would have been removed had they not left. The DBS will consider whether to bar the person. If these circumstances arise in relation to a member of staff at our college, a referral will be made as soon as possible after the resignation or removal of the individual in accordance with advice from the LADO and/or HR. The DSL has a responsibility to inform Barring service.

## **16. Information sharing**

We work in partnership and endeavour to establish effective working relationships with parents, carers, and colleagues from other agencies in line with [Working Together 2018](#) & [Information sharing advice for safeguarding practitioners](#)

Information sharing is vital in identifying and tackling all forms of abuse and neglect, and in promoting children's welfare, including their educational outcomes. Schools/colleges have clear powers to share, hold and use information for these purposes.

As part of meeting a student's needs, our Governing body recognise the importance of information sharing between practitioners and local agencies. This includes ensuring arrangements are in place to set out clearly the processes and principles for sharing information within our setting and with social care, the safeguarding partners, other organisations, agencies, and practitioners as required.

We are proactive in sharing information as early as possible to help identify, assess, and respond to risks or concerns about the safety and welfare of students, whether this is when problems are first emerging, or where an individual is already known to the local authority children's social care.

Our Governing body are aware that among other obligations, the Data Protection Act 2018 and the GDPR place duties on organisations and individuals to process personal information fairly and lawfully and to keep the information they hold safe and secure. Our Governing body/proprietors/management committees ensure that relevant staff have due regard to the relevant data protection principles, which allow

them to share (and withhold) personal information, as provided for in the Data Protection Act 2018 and the GDPR.

Where students leave our college, the DSL will ensure that any relevant Safeguarding information is transferred to the new setting as soon as possible, ensuring secure transit, with confirmation of receipt.

In addition to the safeguarding file, our DSL will also consider if it would be appropriate to share any information with the new place of study in advance of the individual leaving. For example, information that would allow the new setting to continue supporting the victims of abuse and have that support in place for when the individual arrives.

The Data Protection Act 2018 and GDPR do not prevent the sharing of information for the purposes of keeping CYPVA's 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 individuals.

Guidance documents:

- [Data Protection: Toolkit for schools](#)

## **17. Managing complaints**

In line with our college ethos and culture, we encourage students and parents/carers to talk to us if they are unhappy with anything to do with college. We have a robust internal investigation process.

Our complaints policy states clearly the various stages of complaint and where to escalate concerns following completion and outcome of our complaints process. Our complaints policy is available on our college website for parents/carers and is also available on request.

Safeguarding concerns should be raised with school immediately. If a concern means a student is at immediate risk, then the individual needs to contact Staffordshire Childrens Advice and Support Team on (0300 111 8007). All visitors are given safeguarding information which outlines how to share concerns and code of conduct expected by visitors/contractors.

## **18. Site Security**

At NSCG we provide a secure site which is controlled by precise management directives, but the site is only as secure as the people who use it. All people on our site must adhere to the rules which govern it. Laxity can cause potential problems with safeguarding, therefore: -

- The estate is secure and all staff, visitors and students are clearly identifiable through lanyards and ID badges

- Visitors, volunteers, and students must only enter through the main entrance and after signing in at the office will be issued with a specific lanyard or visitor's pass. The college has a clear system of ensuring staff are accompanied / supervised by regulated staff member. Any visitor on site who is not identifiable by a visitor's lanyard will be challenged by any staff member and this will be reported to a member of the security team.
- Parents, carers, and grandparents attending functions have access only through the designated and supervised entrances, with tickets for visitors for appropriate college events.
- Empty classrooms should have closed windows and doors.
- A health and safety audit are completed annually with risk assessment/safety planning and forms part of the Governors annual report. This will include a fire evacuation and Prevent risk assessment.
- The risk management of site security is managed by senior leaders/governance, and we have a clear system of risk assessments and review timescales of these.

## Appendix 1

### Definitions and Indicators of Abuse

1. **Neglect** is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result 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.

The following may be indicators of neglect (this is not designed to be used as a checklist):

- Constant hunger.
- Stealing, scavenging and/or hoarding food.
- Frequent tiredness or listlessness.
- Frequently dirty or unkempt.
- Often poorly or inappropriately clad for the weather.
- Poor school attendance or often late for school.
- Poor concentration.
- Affection or attention seeking behaviour.
- Illnesses or injuries that are left untreated.
- Failure to achieve developmental milestones, for example growth, weight.
- Failure to develop intellectually or socially.
- Responsibility for activity that is not age appropriate such as cooking, ironing, caring for siblings.
- The child is regularly not collected or received from school; or
- The child is left at home alone or with inappropriate carers.
- Adolescent neglect
- Affluent neglect

**2. Physical Abuse** may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a CYPVA. Physical harm may also be caused when a parent or

carer fabricates the symptoms of, or deliberately induces, illness in a child.

The following may be indicators of physical abuse (this is not designed to be used as a checklist):

- Multiple bruises in clusters, or of uniform shape.
- Bruises that carry an imprint, such as a hand or a belt.
- Bite marks.
- Round burn marks.
- Multiple burn marks and burns on unusual areas of the body such as the back, shoulders, or buttocks.
- An injury that is not consistent with the account given.
- Changing or different accounts of how an injury occurred.
- Bald patches.
- Symptoms of drug or alcohol intoxication or poisoning.
- Unaccountable covering of limbs, even in hot weather.
- Fear of going home or parents being contacted.
- Fear of medical help.
- Fear of changing for PE.
- Inexplicable fear of adults or over-compliance.
- Violence or aggression towards others including bullying; or
- Isolation from peers.

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

The following may be indicators of sexual abuse (this is not designed to be used as a checklist):

- Sexually explicit play or behaviour or age-inappropriate knowledge.
- Anal or vaginal discharge, soreness, or scratching.
- Reluctance to go home.
- Inability to concentrate, tiredness.
- Refusal to communicate.
- Thrush, persistent complaints of stomach disorders or pains.
- Eating disorders, for example anorexia nervosa and bulimia.

- Attention seeking behaviour, self-mutilation, substance abuse.
- Aggressive behaviour including sexual harassment or molestation.
- Unusual compliance.
- Regressive behaviour, enuresis, soiling.
- Frequent or open masturbation, touching others inappropriately.
- Depression, withdrawal, isolation from peer group.
- Reluctance to undress for PE or swimming; or
- Bruises or scratches in the genital area.

**4. Emotional Abuse** is the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to 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 the 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 also involve seeing or hearing the ill-treatment of another person. It may involve serious bullying (including cyber bullying), causing CYP frequently to feel frightened or in danger, or the exploitation or corruption of CYP. Some level of emotional abuse is involved in all types of maltreatment.

The following may be indicators of emotional abuse (this is not designed to be used as a checklist):

- The CYP consistently describes him/herself in very negative ways – as stupid, naughty, hopeless, ugly.
- Over-reaction to mistakes.
- Delayed physical, mental, or emotional development.
- Sudden speech or sensory disorders.
- Inappropriate emotional responses, fantasies.
- Neurotic behaviour: rocking, banging head, regression, tics and twitches.
- Self-harming, drug, or solvent abuse.
- Fear of parents being contacted.
- Running away.
- Compulsive stealing.
- Appetite disorders - anorexia nervosa, bulimia; or
- Soiling, smearing faeces, enuresis.

N.B.: Some situations where CYP stop communicating suddenly (known as “traumatic mutism”) can indicate maltreatment.

## **Parental response**

Research and experience indicate that the following responses from parents may suggest a cause for concern across all four categories:

- Delay in seeking treatment that is obviously needed.
- Unawareness or denial of any injury, pain, or loss of function (for example, a fractured limb).
- Incompatible explanations offered, several different explanations or the CYP is said to have acted in a way that is inappropriate to her/his age and development.
- Reluctance to give information or failure to mention other known relevant injuries.
- Frequent presentation of minor injuries.
- A persistently negative attitude towards the CYP.
- Unrealistic expectations or constant complaints about the CYP.
- Alcohol misuse or other drug/substance misuse.
- Parents request removal of the CYP from home; or
- Violence between adults in the household.
- Evidence of coercion and control.

**Disabled Children**-When working with CYPVA with disabilities, practitioners need to be aware that additional possible indicators of abuse and/or neglect may also include:

- A bruise in a site that may not be of concern on an ambulant CYPVA such as the shin, maybe of concern on a non-mobile CYPVA.
- Not getting enough help with feeding leading to malnourishment.
- Poor toileting arrangements.
- Lack of stimulation.
- Unjustified and/or excessive use of restraint.
- Rough handling, extreme behaviour modification such as deprivation of medication, food, or clothing, disabling wheelchair batteries.
- Unwillingness to try to learn a CYPVA's means of communication.
- Ill-fitting equipment, for example, callipers, sleep boards, inappropriate splinting.
- Misappropriation of a CYPVA's finances; or
- Inappropriate invasive procedures.



### **Specific safeguarding issues**

#### **Behaviours linked to safeguarding issues**

All staff have an awareness of safeguarding issues that can put students at risk of harm. Presenting behaviours linked to issues such as drug taking and or alcohol misuse, deliberately missing education, serious violence (including the link to county lines), radicalisation and consensual and non-consensual sharing of nude and semi-nude images and/or videos can be signs that CYP are at risk.

#### **Bullying, including Cyberbullying** (links NSCG Bullying and Harassment Policy)

Bullying may be defined as deliberately hurtful behaviour, usually repeated over a period, where it is difficult for those bullied to protect themselves. It can take many forms, but the main types are:

- Physical (e.g., hitting, kicking, theft)
- Verbal (e.g., racist, or homophobic remarks, threats, name-calling)
- Emotional (e.g., isolating an individual from the activities and social acceptance of their peer group)
- Cyberbullying (including sexting)

Guidance on bullying can be [Preventing & tackling bullying](#)  
[Cyberbullying advice](#)

#### **Child on Child abuse (incl sexual violence and sexual harassment)**

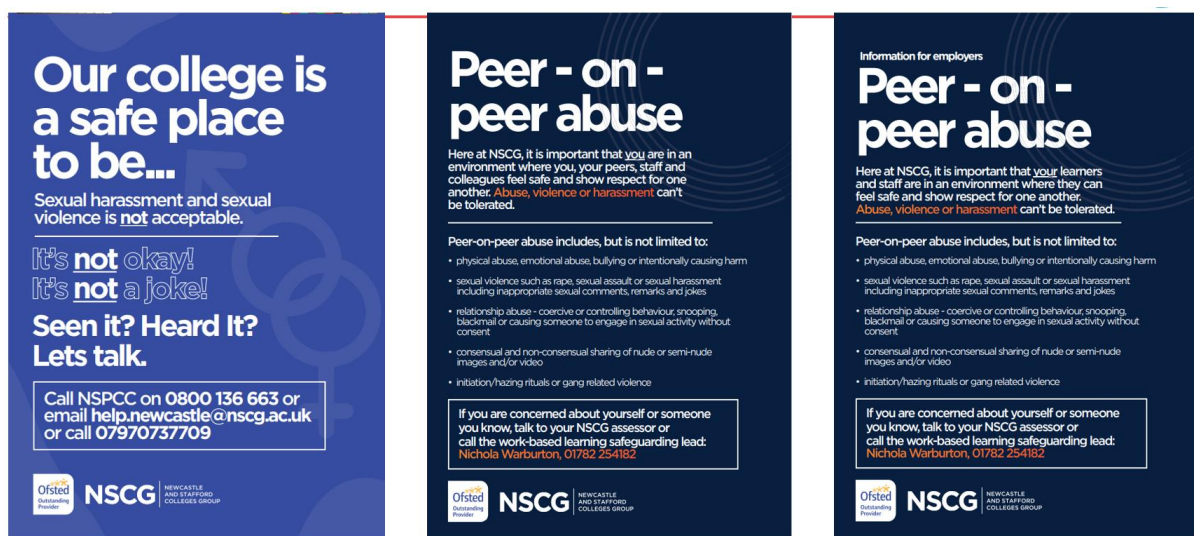
**All** staff have the knowledge and awareness that children are capable of abusing other children (including online). All staff are clear about this school's policy and procedure regarding child-on-child abuse. We have a separate child-on-child abuse policy in addition to anti-bullying and behaviour policies to guide, inform and support CYP, staff and parents/carers. (Links to NSCH child on child abuse policy – Including Sexual Violence and Sexual Harassment between Children Policy)

Child-on-Child abuse can occur, both physically and verbally, either online or face to face, between two children of **any** age and sex, with a single child or group of children and can happen both inside and outside of our setting. Children who are victims of this abuse, will find the experience stressful and distressing and it is likely to have an adverse effect their educational attainment. This type of abuse can exist on a continuum and

may overlap, they can occur online and offline (both physical and verbal) and are never acceptable.

**All** staff at NSCG recognise the indicators and signs of child-on-child abuse and know how to identify it and respond to reports of it. They understand the importance of the **timely** challenge of inappropriate behaviours between peers, many listed below, that are abusive in nature. They are aware of the importance of: -

- Making clear that child-on-child abuse including sexual violence and sexual harassment, is never acceptable and that that we have a zero-tolerance approach.
- Not dismissing this abuse as “banter”, “part of growing up”, “just having a laugh” or “boys being boys”; and
- Challenging behaviours (potentially criminal in nature), such as physical and sexual assaults e.g. grabbing bottoms, breasts, and genitalia, flicking bras and the lifting up of skirts.



**All** staff know that if we do not challenge and support our CYPVA that this will lead to a **culture** of unacceptable behaviours, an unsafe environment for children and in worst case scenarios a culture that normalises abuse leading to CYP accepting it as normal and not coming forward to report it.

We know that the initial response to a report from a CYP is vitally important. We do not want to miss that opportunity and so we reassure victims that their reports are being taken seriously and that they will be supported and kept safe. We never give victims the impression that they are creating a problem by reporting sexual violence or sexual harassment. We reassure victims that they should not feel ashamed for making a report.

We have well promoted and easily understood systems in place so that our CYP feel confident to knowing their concerns will be treated seriously. We strive to achieve this by listening to students, recording, investigating, and dealing with the situation using clear and transparent processes which are in place. This will to show victims, perpetrators and any other individuals affected that they will be supported. We will involve other agencies as deemed necessary and comprehensively risk assess the situation.

**All** victims are reassured that they are being taken seriously, regardless of how long it has taken them to come forward, and that they will be supported and kept safe. Abuse that occurs online or outside of the college will not be downplayed and will be treated equally seriously. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report. We will ensure that CYP know that the law is in place to protect them rather than criminalise them, and we will be explained in such a way that avoids alarming or distressing them.

Staff are aware of the groups that are potentially more at risk as evidence shows that girls, CYP with SEND and LGBT CYP are at greater risk. The DfE states 'peer on peer abuse should be taken as seriously as abuse by adults and should be subject to the same child protection procedures.

Victims of peer-on-peer abuse will be supported by the college's Student Services team and referred to specialist agencies if appropriate. Risk assessment and/or safety planning are an integral part of this support plan, particularly regarding the post incident management.

**All** staff understand, that even if there are no reports in our setting, this does not mean that it is not happening, it may be the case that it is just not being reported. As such it is important that if staff at NSCG have any concerns regarding peer-on-peer abuse, they speak to their Designated Safeguarding Lead (DSL) or deputy (DDSL). Our staff will not develop high thresholds before acting.

Child on child abuse is most likely to include, but may not be limited to:

- bullying (including cyberbullying, prejudice-based and discriminatory bullying).
- abuse in intimate personal relationships between peers.
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse).

- sexual violence such as rape, assault by penetration and sexual assault and may include an online element which facilitates, threatens and/or encourages sexual violence. 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.
- sexual harassment such as sexual comments, remarks about clothes and/or appearance, jokes, taunting and online sexual harassment. This also includes the telling of sexual stories, making lewd comments and calling someone sexual names and physical behaviour, such as: deliberately brushing against someone, interfering with someone's clothes, and displaying pictures, photos or drawings of a sexual nature; and online sexual harassment.
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.
- consensual and non-consensual sharing of nudes and semi-nude images and or videos (also known as sexting or youth produced sexual imagery) Consensual image sharing, especially between older CYP of the same age, may require a different response. It might not be abusive – but CYP still need to know it is illegal- whilst non-consensual is illegal and abusive.
- upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or alarm; and
- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

All staff are aware of the importance of understanding intra familial harms and any necessary support for siblings following incidents.

**All staff are** clear as to the school's or college's policy and procedures with regards to child-on-child abuse and the important role they play in preventing it and responding where they believe a CYP may be at risk from it.

If staff have a concern about a CYP or a CYP makes a report to them, they will follow the safeguarding referral process. As in any case, if staff are in any doubt as to what to do, they should speak to the DSL/DDSL. Our behaviour policy will support any sanctions.

The DfE states child on child abuse should be taken as seriously as abuse by adults and should be subject to the same child protection procedures.

Guidance Documents:

- [Staffsccb-Responding to Sexting Guidance](#)
- [Disrespect NoBody campaign](#)
- [CEOP-Safety centre](#)
- [UKCIS Guidance: Sharing Nudes and Semi-Nudes](#)
- [Review of sexual abuse in schools and colleges - GOV.UK \(www.gov.uk\)](#)
- [Searching, screening and confiscation \(publishing.service.gov.uk\)](#)
- [Sharing nudes and semi-nudes: advice for education settings working with children and young people - GOV.UK \(www.gov.uk\)](#)

## **Children Missing Education**

**All** professionals working with CYP, as well as the wider community can help by remaining vigilant to CYP's safety. The law states every CYP should be receiving an education, and we stand a better chance of ensuring a CYP's safety if we know where and how they are receiving this. The Education and Inspections Act 2006 places a duty on local authorities in England and Wales to make arrangements to identify CYP and young people of compulsory school age missing education in their area; we work closely to ensure we put appropriate safeguarding responses in place for CYP who go missing from education.

A CYP going missing, particularly repeatedly, can be a vital warning sign of a range of safeguarding risks, including abuse and neglect, which may include sexual abuse or exploitation; child criminal exploitation; mental health problems; substance abuse and other issues. Early intervention is necessary to identify the existence of any underlying safeguarding risk and to help prevent the risks of them going missing in future.

Our college holds emergency contact numbers for each student. If a vulnerable student goes missing from our college and we are unable to locate them, we will inform parents/carers and we will also contact the Police to report them missing. This will ensure that the Police and other partners have a true picture of missing episodes, which are indicators of risk for some CYP.

Please ensure that your policies are clear regarding CYP going missing from the college site and that **ALL** staff are aware of the processes and the role that they **ALL** play in this. In particular the importance of the completing registers at the earliest opportunities.

The college will notify the Local Authority of any student who fails to attend college regularly after making reasonable enquiries or has been absent without the college's permission for a continuous period of time.

Our college will demonstrate that we have taken reasonable enquiries to ascertain the whereabouts of CYP that would be considered [‘missing’](#)

### **Child Missing from Home or Care**

There are strong links between CYP involved in criminal and sexual exploitation and other behaviours such as running away from home, care or school, bullying, self-harm, teenage pregnancy, truancy, and substance misuse.

In addition, some are particularly vulnerable, for example, individuals with special needs, those in residential or foster care, those leaving care, migrant individuals, particularly those who are unaccompanied, those forced into marriage, those involved in gangs and unaccompanied asylum-seeking young people.

Most who go missing, are not in care and go missing from their family home. However, individuals who are looked after are much more likely to run away than those who live at home, and over 50% of young people in care have run away at some point.

Guidance document

- [Children who run away or go missing from home or care](#)

### **Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE).**

Both CSE and CCE are forms of abuse that occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a young person into taking part in sexual or criminal activity, in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence.

CSE and CCE can affect CYP, both male and female and can include those who have been moved (commonly referred to as trafficking) for the purpose of exploitation.

### **Child Criminal Exploitation (CCE)**

Some specific forms of CCE can include young people being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting, or pickpocketing. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others.

Individuals can become trapped by this type of exploitation as perpetrators can threaten victims (and their families) with violence or

entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm, from others. Individuals involved in criminal exploitation often commit crimes themselves, their vulnerability as victims is not always recognised by adults and professionals, (particularly older CYP), and they are not treated as victims despite the harm they have experienced. They may still have been criminally exploited even if the activity appears to be something they have agreed or consented to.

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

Some of the following can be indicators of CCE:

- unexplained gifts or new possessions.
- associate with other young people involved in exploitation.
- changes in emotional well-being.
- misuse drugs and alcohol.
- missing for periods of time or regularly come home late.
- regularly miss education or do not take part in education.

Guidance documents:

- [Safeguarding Children who may have been trafficked](#)
- [CYPVA Exploitation - StaffsSCB](#)

### **Child sexual exploitation (CSE)**

CSE is a form of child sexual abuse. Sexual abuse may involve physical contact, including assault by penetration (for example, rape or oral sex) or nonpenetrative acts such as masturbation, kissing, rubbing, and touching outside clothing. It may include non-contact activities, such as involving CYPVA in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse including via the internet.

CSE can occur over time or be a one-off occurrence and may happen without the immediate knowledge e.g., through others sharing videos or images of them on social media.

CSE can affect any CYP, who has been coerced into engaging in sexual activities. This includes 16- and 17-year-olds who can legally consent to

have sex. Some CYP's may not realise they are being exploited e.g. they believe they are in a genuine romantic relationship.

The above CCE indicators can also be signs of CSE, as can having older boyfriends or girlfriends and/or suffering from sexually transmitted infections/becoming pregnant.

Guidance documents:

- [Child Sexual Exploitation Definition & Guidance](#)
- [Know about CSE](#)

## **County Lines**

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

Exploitation is an integral part of the county lines offending model with CYP (Children and Young People) and vulnerable adults exploited to move and/or store drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. CYP can be targeted and recruited into county lines in several locations including schools, further and higher educational institutions, pupil referral units, special educational needs schools, Children's homes, and care homes.

CYP are often recruited to move drugs and money between locations and are known to be exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection. CYP can easily become trapped by this type of exploitation as county lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

One of the ways of identifying potential involvement in county lines are missing episodes (both from home and college), when the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism (NRF) should be considered. Further information can be found here [National Referral Mechanism](#)

If a CYP 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.

Like other forms of abuse and exploitation, county lines exploitation: -



- Can affect any child or young person (male or female) under the age of 18 years.
- Can affect any vulnerable adult over the age of 18 years.
- Can still be exploitation even if the activity appears consensual.
- Can involve force and/or enticement-based methods of compliance and is often accompanied by violence or threats of violence.
- Can be perpetrated by individuals or groups, males or females, and young people or adults and
- Is typified by some form of power imbalance in favour of those perpetrating the exploitation. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, cognitive ability, physical strength, status, and access to economic or other resources.

Guidance Document:

- [Criminal Exploitation of Children and Vulnerable Adults; County Lines](#)
- [County Lines toolkit](#)

## **Domestic Abuse**

Any incident or pattern of incidents of controlling, coercive or threatening behaviour, violence, or abuse between those aged 16 or over who are or have been intimate partners or family members regardless of gender or sexuality. This can encompass but is not limited to the following types of abuse:

- Psychological
- Physical
- Sexual
- Financial
- Emotional

CYP 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) Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on CYP. In some cases, a CYP may blame themselves for the abuse or may have had to leave the family home as a result. Domestic abuse affecting young people, can also occur within their personal relationships, as well as in the context of their home life. We will signpost and support our CYP.

We are an Operation Encompass college and act appropriately when we receive an alert to support the students in our college.

Guidance Documents:

- [Domestic Violence and Abuse](#)
- [Domestic Abuse-Staffsccb](#)
- [NSPCC-Domestic Abuse](#)
- Operation Encompass helpline 0204 513 9990 (8am-1pm Mon-Frid)

## **Drugs**

There is evidence that CYP are increasingly misusing alcohol and illegal drugs. Consequences range from non-attendance and poor attainment at school, poor health, committing crime to support 'habits' and increased risk of being a victim of violent crime and criminal exploitation, including sexual exploitation.

Guidance Documents:

- [NSPCC-Parental Substance Misuse](#)
- [SSCB-Working with parents who misuse substances](#)
- [Drugs Advise for Schools](#)

## **Fabricated or Induced Illness (FII)**

Fabricated or Induced Illness is a condition whereby a CYPVA suffers harm through the deliberate action of their carer, and which is attributed by the adult to another cause.

There may be several explanations for these circumstances, and each requires careful consideration and review. Concerns about a CYPVA's health should be discussed with a health professional who is involved with the CYP. Guidance Documents:

- [Safeguarding Children in whom illness is fabricated or induced](#)
- [Fabricated or induced Illness \(staffsccb.org.uk\)](#)

## **Homelessness**

Being homeless or being at risk of becoming homeless presents a real risk to a CYP's welfare. The DSL/DDSL are aware of local contact details and referral routes into local housing organisations, so they can raise/progress concerns at the earliest opportunity.

Indicators of risk include household debt, rent arrears, domestic abuse, and anti-social behaviour, as well as the family being asked to leave a property. Whilst referrals and/or discussion with the Local Housing Authority will be progressed as appropriate, and in accordance with local procedures, this will **not** replace a referral into social care where a CYP has been harmed or is at risk of harm.

We also recognise that in some cases 16/17 yr olds could be living independently from their parents or guardians and they will require a

different level of intervention and support. Children's services will be the lead agency for these young people and the DSL will ensure that appropriate referrals are made based on the CYP's circumstances.

### **Honour-based Abuse**

So-called 'honour-based' abuse (HBA) encompasses incidents or 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. Abuse committed in the context of preserving "honour" often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors, when deciding what form of safeguarding action to take. All forms of HBA are abuse (regardless of the motivation) and should be handled and escalated as such. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a CYP being at risk of HBA, or already having suffered HBA.

### **Female Genital Mutilation (FGM)**

FGM comprises of 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. It is known by several names including "cutting", "female circumcision" or "initiation". The term female circumcision suggests that the practice is like male circumcision, but it bears no resemblance to male circumcision, and it has serious health consequences with no medical benefits. FGM is also linked to domestic abuse, particularly in relation to "honour-based abuse".

FGM mandatory reporting duty for teachers Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a statutory duty upon teachers along with regulated health and social care professionals in England and Wales, to report to the police where they discover (either via disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18.

Those failing to report such cases may face disciplinary sanctions. It is rare to see visual evidence, and child should not be examined but the same definition of what is meant by "to discover that an act of FGM appears to have been carried out" is used for all professionals to whom this mandatory reporting duty applies.

Staff **must** personally report to the police cases where they discover that an act of FGM appears to have been carried out. Unless there is good reason not to, they should still consider and discuss any such case with

the DSL (or deputy) and involve social care as appropriate. The duty does not apply in relation to at risk or suspected cases (i.e. where staff do not discover that FGM appears to have been carried out, either through disclosure by the victim or visual evidence) or in cases where the woman is 18 or over. In these cases, staff will follow local safeguarding procedures.

Guidance Documents: -

- [Multi Agency Statutory guidance on Female Genital Mutilation](#)
- [Female Genital Mutilation Act 2003](#)

## **Forced Marriage**

Forcing a person into a 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. The 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). Some perpetrators use perceived culture practices, to coerce a person into marriage. Schools and colleges play an important role in safeguarding CYP from forced marriage.

There are some significant differences between the referral of a concern about a young person being forced into marriage and other CYP protection referrals. Professionals must be aware that sharing information with a young person's parents, extended family, or members of their community, could put the young person in a situation of significant risk.

Any disclosure that indicates a young person may be facing a forced marriage must be taken seriously by professionals who should also realise that this could be 'one chance to save a life'. A forced marriage is a marriage in which one or both spouses do not consent to the marriage but are coerced into it. Duress can include physical, psychological, financial, sexual, and emotional pressure. In cases of vulnerable adults who lack the capacity to consent to marriage, coercion is not required for a marriage to be forced.

Guidance Document:

- [Forced Marriage](#)
- [The right to choose: government guidance on forced marriage](#)

## **Mental Health**

**All** staff have an important role to play in supporting the mental health and wellbeing of our students and **are** aware that mental health problems can, in some cases, be an indicator that a CYPVA has suffered or is at risk

of suffering abuse, neglect or exploitation. We have clear systems and processes in place for identifying possible mental health problems, including routes to escalate and clear referral and accountability systems. NSCG has a Mental Health Lead who has completed the Mental Health Lead training funded by the Department for Education. This is Lesley Morrey Ext 407. The college signed up to the Association of College Mental Health Charter back in 2020. This Charter has now been signed by over 200 Colleges across the country and it enables colleges the chance to publicly state their commitment to the mental health agenda. NSCG have developed a Mental Health and Wellbeing Strategy and Action Plan that outlines our commitment to:

- Ensure that wellbeing and mental health work is led by a senior manager supported by a member of staff with particular responsibility for mental health.
- Have a wellbeing and mental health policy accompanied by a clear implementation action plan which is monitored regularly and reviewed annually.
- Create an open and inclusive college ethos which includes respect for those with mental ill health.
- Promote equality of opportunity and challenge mental health stigma through curriculum teaching and also promote wellbeing through tutorial programmes.
- Provide appropriate mental health training for staff.
- Encourage and collect student views on mental health and wellbeing by working with the Students' Union and other student representative bodies.
- Ensure a consistent and positive approach to staff wellbeing.
- Provide targeted individual mental health support where appropriate or alternatively signpost to external support services.
- Provide relevant information to parents and carers.
- Establish effective links with local health and voluntary sector mental health groups.
- Promote the benefit that physical activity and sport has on mental wellbeing.

**NSCG Mental Health and Wellbeing  
Strategy and Action Plan 21-23**



NSCG recognise only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. college staff, however, are well placed to **observe** students day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.

Where CYPVA have suffered abuse and neglect, or other potentially traumatic Adverse Child Experiences (ACE), this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these experiences, can impact on their mental health, behaviour, and education.

Guidance and helpful documents: -

- [Addressing Trauma and Adversity](#)
- [Mental Health and Behaviour in Schools Guidance.](#)
- [Preventing and tackling bullying](#)
- [Every Interaction Matters](#)
- [MIND-Parenting Capacity and Mental Health](#)
- [NSPCC-Mental Health and Parenting](#)
- [SSCB-Children & Young People who Self Harm or Disclose an Intent to Die by Suicide](#)
- Staffordshire County Council Resource Bank (sent out at least annually)

If staff have a mental health concern about a student that is also a safeguarding concern, immediate action should be taken, following their safeguarding/child protection policy, and by speaking to the designated safeguarding lead or a deputy.

## Online Safety

The use of technology has become a significant component of many safeguarding issues. Child Criminal Exploitation, Child Sexual Exploitation, radicalisation, sexual predation, and technology often provides the platform that facilitates harm.

At NSCG we realise that it is essential for our students to be safeguarded from potentially harmful and inappropriate online material. We have an effective whole college approach to online safety which empowers us to protect and educate students, and staff in their use of technology and establishes mechanisms for us to identify, intervene in, and escalate any concerns where appropriate.

The breadth of issues classified within online safety is considerable, but can be categorised into four 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. If you feel your students or staff are at risk, please report it to the Anti-Phishing Working Group (<https://apwg.org/>).

We ensure that online safety is a running and interrelated theme whilst devising and implementing policies and procedures. We consider online safety in other relevant policies, when planning curriculum, staff training, the role and responsibilities of the DSL and parental engagement. We have filters and monitoring systems in place, and these are regulated, and risk assessed as part of the Prevent duty.

We have an Acceptable User Policy which identifies the usage and expected behaviour of staff and students. As a college we appreciate the value of technology and that appropriate filters are in place, yet this does not lead to unreasonable restrictions which would limit online teaching and safeguarding.

Education at home/Remote learning: - Where students are being asked to learn online at home, our college will refer to and use the links and resources provided by the DfE; Safeguarding in schools, colleges and other providers and safeguarding in remote education.

At NSCG we have an effective firewall filtering system. The firewall system is Fortinet -Fortigate 600D and this generates reports on individuals who may be trying to access sites which include the categories mentioned earlier.

Students receive annual awareness sessions as part of the themed tutorial programme to raise their awareness and understanding of online safety and the policies and procedures we have within the college.

Guidance Documents:

- [Children's Commissioner-Online Safety](#)
- [Teaching online safety in education settings](#)
- [Appropriate Filtering and Monitoring](#)
- [CEOP-Safety Centre](#)
- [National Cyber Security Centre](#)
- [NSPCC-Undertaking remote teaching safely](#)
- [360 Degree Safe - Online Safety Review Tool](#)
- [UKCCIS-UK Council for Child Internet Safety](#)

## **Private Fostering**

A private fostering arrangement is one that is made privately (without the involvement of a local authority) for the care of a child under the age of 16 (under 18, if disabled) by someone other than a parent or immediate relative. If the arrangement is to last, or has lasted, for 28 days or more, it is categorised as private fostering.

Close relatives are defined as a grandparent, brother, sister, uncle, or aunt (whether of full blood or half blood or by marriage or civil partnership), or a stepparent.

People become involved in private fostering for all kinds of reasons. Examples of private fostering include:

- Children who need alternative care because of parental illness.
- Children whose parents cannot care for them because their work or study involves long or antisocial hours.
- Children sent from abroad to stay with another family, usually to improve their educational opportunities.
- Unaccompanied asylum seeking and refugee Children.
- Teenagers who stay with friends (or other non-relatives) because they have fallen out with their parents.



- Children staying with families while attending a school away from their home area.

Our staff at NSCG will notify the DSL/DDSL when they become aware of a private fostering arrangement for an under 18 yr. old student or a student who has a disability. There is a mandatory duty on the college to inform Staffordshire Children's Social Care of a private fostering arrangement by contacting (0800 1313126), who then have a duty to check that the young person is being properly cared for and that the arrangement is satisfactory.

Guidance Document:

- [Children Act 1989 – Private Fostering](#)

## Preventing Radicalisation

Students are vulnerable to extremist ideology and radicalisation. Similar to protecting students from other forms of harms and abuse, protecting students from this risk should be a part of a colleges' safeguarding approach.

- **Extremism** is the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces.
- **Radicalisation** refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.
- **Terrorism** is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious, or ideological cause.

At **NSCG** we value freedom of speech and the expression of beliefs and ideology as fundamental rights underpinning our society's values. Students and college staff have the right to speak freely and voice their opinions. However, freedom comes with responsibility and free speech that is designed to manipulate the vulnerable or that leads to violence and harm of others goes against the moral principles in which freedom of speech is valued. Free speech is not an unqualified privilege; it is subject to laws and policies governing equality, human rights, community safety and community cohesion.

There is no single way of identifying whether an individual is likely to be susceptible to an extremist ideology. Background factors combined with specific influences such as family and friends may contribute to a

students's vulnerability. Similarly, radicalisation can occur through many different methods (such as social media or the internet) and settings (such as within the home).

The normalisation of extreme views may also make children and young people vulnerable to future manipulation and exploitation. **NSCG** is clear that this exploitation and radicalisation must be viewed as a safeguarding concern and that protecting students from the risk of radicalisation is part of the college's safeguarding duty.

The college's designated safeguarding lead (and any deputies) are aware of local procedures for making a Prevent referral.

Definitions of radicalisation and extremism, and indicators of vulnerability to radicalisation are in **Appendix 4**.

## **Prevent Duty and Channel**

### **Prevent**

The college governors, the Principal and the DSL will assess the level of risk within the college and put actions in place to reduce that risk. Risk assessment includes consideration of the college's tutorial programme content, the use of college premises by external agencies and guest speakers, The use of IT and social media, integration of students by gender and SEN, anti-bullying policy, staff and student training and other issues specific to the college's profile, community and philosophy.

All educational establishments are subject to a duty to have "due regard to the need to prevent people being drawn into terrorism" (section 26, Counter Terrorism and Security Act 2015). This is known as The Prevent Duty and is part of our colleges wider safeguarding obligations.

Designated safeguarding leads and other senior leaders familiarise themselves with the revised Prevent duty guidance: for England and Wales, especially paragraphs 57-76, which are specifically concerned with schools/colleges. We follow the guidance in terms of four general themes: risk assessment, working in partnership, staff training, and IT policies.

Our college has a Prevent Single Point of Contact (SPOC) who is the lead within the organisation for safeguarding in relation to protecting individuals from radicalisation and involvement in terrorism:

The SPOC for our school is Lesley Morrey. Ext 407

Our college will monitor online activity to ensure that inappropriate sites are not accessed by students or staff. This is done using specialist online

monitoring software, which in this college is called Fortinet -Fortigate 600D

## **Channel**

Channel is a multi-agency approach to provide support to individuals who are at risk of being drawn into terrorist related activity. It is led by the Staffordshire Police Counter-Terrorism Unit, and it aims to:

- Establish an effective multi-agency referral and intervention process to identify vulnerable individuals.
- Safeguard individuals who might be vulnerable to being radicalised, so that they are not at risk of being drawn into terrorist-related activity; and
- Provide early intervention to protect and divert people away from the risks they face and reduce vulnerability.
- The Channel programme focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. It provides a mechanism for schools to make referrals if they are concerned that an individual might be vulnerable to radicalisation. An individual's participation in the programme is entirely voluntary at all stages.
- Colleges have a duty to cooperate with the Channel programme in the carrying out of its functions, and with the Police in providing information about an individual who is referred to Channel (Section 38, Counter Terrorism and Security Act 2015).

Guidance Documents:

- [The Prevent Duty.](#)
- [Educate Against Hate](#)
- [ACT Early | Prevent radicalisation](#)

## **Serious Violence**

All staff should be aware of the indicators, which may signal individuals are at risk from, or are involved with serious violent crime. These may include increased absence from college, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that students have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation. All staff should be aware of the range of risk factors which increase the likelihood of involvement in serious violence, such as being male, having been frequently absent or permanently excluded from school, having experienced maltreatment and having been involved in offending, such as theft or robbery.

Guidance documents:

- [Home Office Preventing Youth Violence and Gang Involvement](#)
- [Criminal Exploitation of Children and Vulnerable Adults; County Lines](#)

### **Allegations about a Member of Staff (Incl supply), Governor or Volunteer**

1. Inappropriate behaviour by staff/supply staff/volunteers could take the following forms:
  - **Physical**  
For example, the intentional use of force as a punishment, slapping, use of objects to hit with, throwing objects, or rough physical handling.
  - **Emotional**  
For example, intimidation, belittling, scapegoating, sarcasm, lack of respect for CYP's rights, and attitudes that discriminate on the grounds of race, gender, disability, or sexuality.
  - **Sexual**  
For example, sexualised behaviour towards students, sexual harassment, inappropriate phone calls and texts, images via social media, sexual assault, and rape.
  - **Neglect**  
For example, failing to act to protect a CYP, failing to seek medical attention or failure to carry out an appropriate risk assessment.
  - **Spiritual Abuse**  
For example, using undue influence or pressure to control individuals or ensure obedience, follow religious practices that are harmful such as beatings or starvation.
2. If a student makes an allegation about a member of staff, supply staff, Governor, visitor or volunteer the Principal must be informed immediately. The Principal must carry out an urgent initial consideration to establish whether there is substance to the allegation. The Principal should not carry out the investigation him/herself or interview students.
3. The Principal will exercise and be accountable for their professional judgement on the action to be taken as follows:
  - If the actions of the member of staff, and the consequences of the actions, raise credible Child Protection concerns the Head Principal will ensure the Staffordshire Designated Officer (**LADO**) (**0300 111 8007**) is informed. The LADO will liaise with the college and advise about action to be taken and may initiate internal referrals within Staffordshire Children's Social Care to address the needs of individuals likely to have been affected.

- If the actions of the member of staff, and the consequences of the actions, do not raise credible child protection concerns, but do raise other issues in relation to the conduct of the member of staff or the student. These should be addressed through the colleges's own internal procedures.
  - If the Principal decides that the allegation is without foundation and no further formal action is necessary, all those involved should be informed of this conclusion, and the reasons for the decision should be recorded on the students safeguarding file.
4. Where we are not the employer of an individual, we still have responsibility to ensure allegations are dealt with appropriately and that they liaise with relevant parties (this includes supply staff and volunteers). In no circumstances will our college decide to cease to use supply staff due to safeguarding concerns, without finding out the facts and liaising with the LADO to determine a suitable outcome. We will discuss with the agency whether it is appropriate to suspend the supply staff member, or redeploy them to another part of the college, whilst they carry out their investigation.
  5. Where an allegation has been made against the Principal, then the Chair of the Governing Body takes on the role of liaising with the LADO in determining the appropriate way forward. [Managing Allegations of Abuse against a person who works with Children](#)

**Indicators of Vulnerability to Radicalisation**

1. Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism leading to terrorism.
2. Extremism is defined by the Government in the Prevent Strategy as: 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.
3. Extremism is defined by the Crown Prosecution Service as:
  - The demonstration of unacceptable behaviour by using any means or medium to express views which
  - Encourage, justify, or glorify terrorist violence in furtherance of beliefs
  - Seek to provoke others to terrorist acts
  - Encourage other serious criminal activity or seek to provoke others to serious criminal acts or
  - Foster hatred which might lead to inter-community violence in the UK.
4. There is no such thing as a “typical extremist”: those who become involved in extremist actions come from a range of backgrounds and experiences, and most individuals, even those who hold radical views, do not become involved in violent extremist activity.
5. Students may become susceptible to radicalisation through a range of social, personal, and environmental factors - it is known that violent extremists exploit vulnerabilities in individuals to drive a wedge between them and their families and communities. It is vital that school staff can recognise those vulnerabilities.
6. Indicators of vulnerability include:
  - Identity Crisis – the student is distanced from their cultural/religious heritage and experiences discomfort about their place in society.
  - Personal Crisis – the student may be experiencing family tensions; a sense of isolation; and low self-esteem; they may have dissociated from their existing friendship group and become involved with a new and different group of friends; they may be

searching for answers to questions about identity, faith and belonging.

- Personal Circumstances – migration; local community tensions; and events affecting the student/pupil's country or region of origin may contribute to a sense of grievance that is triggered by personal experience of racism or discrimination or aspects of Government policy.
- Unmet Aspirations – the student may have perceptions of injustice; a feeling of failure; rejection of civic life.
- Experiences of Criminality – which may include involvement with criminal groups, imprisonment, and poor resettlement/reintegration.
- Special Educational Need – students/students may experience difficulties with social interaction, empathy with others, understanding the consequences of their actions and awareness of the motivations of others.

7. This list is not exhaustive, nor does it mean that all CYP experiencing the above are at risk of radicalisation for the purposes of violent extremism.

8. More critical risk factors could include:

- Being in contact with extremist recruiters.
- Family members convicted of a terrorism act or subject to a Channel intervention.
- Accessing violent extremist websites, especially those with a social networking element.
- Possessing or accessing violent extremist literature.
- Using extremist narratives and a global ideology to explain personal disadvantage.
- Justifying the use of violence to solve societal issues.
- Joining or seeking to join extremist organisations.
- Significant changes to appearance and/or behaviour; and
- Experiencing a high level of social isolation resulting in issues of identity crisis and/or personal crisis.



## SPOC Contacts

Prevent Leads	Contact Name	Email Address
Cannock	Karla Vowles	<a href="mailto:KarlaVowles@cannockchasedc.gov.uk">KarlaVowles@cannockchasedc.gov.uk</a>
	Oliver Greatbatch	<a href="mailto:olivergreatbatch@cannockchasedc.gov.uk">olivergreatbatch@cannockchasedc.gov.uk</a>
East Staffs	Mike Hovers	<a href="mailto:Michael.hovers@eaststaffsbc.gov.uk">Michael.hovers@eaststaffsbc.gov.uk</a>
	Sal Khan	<a href="mailto:sal.khan@eaststaffsbc.gov.uk">sal.khan@eaststaffsbc.gov.uk</a>
Lichfield	Susan Bamford	<a href="mailto:Susan.Bamford@lichfielddc.gov.uk">Susan.Bamford@lichfielddc.gov.uk</a>
Newcastle	Georgina Evans	<a href="mailto:Georgina.Evans@newcastle-staffs.gov.uk">Georgina.Evans@newcastle-staffs.gov.uk</a>
South Staffs	Maggie Quinn	<a href="mailto:M.Quinn@sstaffs.gov.uk">M.Quinn@sstaffs.gov.uk</a>
Stafford	Victoria Cooper	<a href="mailto:vcooper@staffordbc.gov.uk">vcooper@staffordbc.gov.uk</a>
Staffs Moorlands	David Smith	<a href="mailto:david.smith@staffsmoorlands.gov.uk">david.smith@staffsmoorlands.gov.uk</a>
Tamworth	Joanne Sands	<a href="mailto:joanne-sands@tamworth.gov.uk">joanne-sands@tamworth.gov.uk</a>
Staffordshire County Council (Safer Communities)	Fiona Chapman	<a href="mailto:fiona.chapman@staffordshire.gov.uk">fiona.chapman@staffordshire.gov.uk</a>
Staffordshire Police Prevent Team	Sgt. Darren McGrath	<a href="mailto:prevent@staffordshire.police.uk">prevent@staffordshire.police.uk</a>

### Role of the Staffordshire LADO

The Staffordshire LADO (Local Authority Designated Officer) promotes a safer children's workforce by providing effective guidance, advice, and investigation oversight to cases. They may be able to offer advice and assist with communication in situations which sit outside the statutory criteria, albeit at the discretion of the LADO Duty Officer and where the broader goals of a safer children's workforce are relevant.

The service will give advice on how concerns or allegations should be investigated, including if a referral needs to be raised with the Police and/or Children's Social Care. Staffordshire LADO is not directly responsible for investigatory activities but will actively support any investigation and give advice around a range of parameters including suspension, possible media interest, when to tell the adult, and ensure all interested parties are appropriately linked together. They will retain oversight of individual cases to ensure concerns or allegations are investigated thoroughly in a fair and timely manner, and will advise in relation to any subsequent duties to communicate with regulatory bodies and/or the DBS.

The StaffsSCB inter-agency procedures for:

[Managing Allegations of Abuse against a person who works with children](#) is based on the framework for dealing with allegations made against an adult who works with children, this is detailed in [Working Together 2018](#) and should be followed by all organisations providing services for children and young people. Compliance with these procedures will help to ensure that allegations are dealt with consistently and in a timely manner, that a thorough, proportionate, and fair process is followed and that processes are open to challenge.

Arrangements for managing concerns or allegations of this nature should be robust and effective in keeping children safe. All allegations should be taken seriously, approached with an open mind, and not be driven by preconceived opinions about whether a CYPVA has or has not been harmed.

[Guidance for Safer Working Practice](#) is available which will help individuals form judgements on what may constitute behaviour that is unsafe or abusive.

*Who to refer concerns to:*

All reports of concern or allegation to the Staffordshire LADO (Local Authority Designated Officer) that an adult working or volunteering with children:

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

**Step 1:** Follow KCSiE 2022 Guidance. Principal/ Chair of Governors will contact the LADO on 0300 111 8007

**Step 2:** Staffordshire Childrens Advice and Support Team will ensure that the matter is passed promptly to the Staffordshire LADO Duty Officer and assist in initiating any additional safeguarding activities.

If your concern or allegation is urgent and outside of office hours telephone: 0345 6042 886 (the Emergency Duty Team).

This single referral point will provide a responsive and inclusive service for all children's workforce sectors, focus the advice and support where it is needed most and enable the team to continue to work effectively with partners.

### **Useful safeguarding contacts**

- Staffordshire Education Safeguarding Advice Service (ESAS) on 01785 895836 email: [esas@staffordshire.gov.uk](mailto:esas@staffordshire.gov.uk)
- Local Authority Designated Officer (LADO) 0300 111 8007
- Staffordshire Children's Advice and Support (SCAS) 0300 111 8007
- Emergency Duty Services (EDS-out of hours safeguarding concerns) 0345 604 2886 or email [eds.team.manager@staffordshire.gov.uk](mailto:eds.team.manager@staffordshire.gov.uk)
- Staffordshire Police Multi Agency Safeguarding Hub (MASH) via 101, in an emergency please dial 999
- Stoke-on-Trent Children's Services: Chat and Advice Service (CHAD) 01782 235100 Emergency Duty Team: 01782 234234 (outside office hours)
- Dave Atherton - School Guidance around Asylum Seekers (Central Thoroughfare Team) [david.atherton@staffordshire.gov.uk](mailto:david.atherton@staffordshire.gov.uk)
- Staffordshire Police coordinator: Mark Hardern Tel: 07539 3636299 Email: [mark.hardern@staffordshire.pnn.police.uk](mailto:mark.hardern@staffordshire.pnn.police.uk)
- Staffordshire Police Prevent Team 01785 232054, 01785 233109 or email [prevent@staffordshire.police.uk](mailto:prevent@staffordshire.police.uk)
- PHSE Coordinator Natalie McGrath [natalie@staffscvys.org.uk](mailto:natalie@staffscvys.org.uk)

### **Local Advice**

- Fostering Service (Staffordshire) 0800 169 2061 email [fostering&adoptionbus@staffordshire.gov.uk](mailto:fostering&adoptionbus@staffordshire.gov.uk)  
Out of Hours: Emergency Duty Service 01785 354030
- Staffordshire Safeguarding Children Board [StaffsSCB](#)
- Entrust HR Services (subscription basis) 01785 278961
- Fostering Service (Stoke-on-Trent) 01782 234555  
Email: [fostering@stoke.gov.uk](mailto:fostering@stoke.gov.uk)
- Stoke-on-Trent
- Family Information Service Hub (F.I.S.H) 01782 232200 email [fish@stoke.gov.uk](mailto:fish@stoke.gov.uk)

### **Useful Safeguarding links**

#### **NSPCC**

- [Harmful sexual behaviour \(HSB\) NSPCC Learning](#)
- [Keeping Children safe online-online safety/sexting/sending nudes](#)

#### **National Contacts**

- CEOP (CYPVA Exploitation and Online Protection) [CEOP Safety Centre](#)

- Professionals Online Safety Helpline – 0844 381 4772 [Safer Internet Helpline](#)
- Internet Watch Foundation (IWF) – [Internet Watch Foundation](#)
- Safer Internet Centre – [helpline@saferinternet.org.uk](mailto:helpline@saferinternet.org.uk)
- Childline – 0800 1111 [Childline](#)
- Ofsted – General enquiries: 0300 123 1231  
About Schools: 0300 123 4234  
Concerns: 0300 123 4666  
e-mail: [enquiries@ofsted.gov.uk](mailto:enquiries@ofsted.gov.uk)
- HM Government (advice on protecting children from radicalisation for parents, teachers, and leaders) [www.educateagainsthate.com](http://www.educateagainsthate.com)
- **NSPCC** Harmful Sexual Behaviour project: **0844 892 0273**

### **Useful websites**

- Staffordshire Safeguarding Children Board [StaffsSCB](#)
- CYPVA Exploitation and Online Protection Centre (CEOP) – [Ceop-Police](#) & [knowaboutcse](#)
- NSPCC – 24-hour CYPVA Protection Helpline 0808 800 5000  
[NSPCC](#)
- Women’s Aid - 24 Hour Helpline: 0870 2700 123
- UNICEF – Support Care Team 0300 330 5580 (Mon – Fri 8am-6pm).  
If you think a CYPVA is in immediate danger, please call 999. [Unicef](#)