

Safeguarding, Child Protection and Prevent Policy

This policy applies to all students and apprentices and students and apprentices who are applying for places on programmes at DN Colleges Group and partner sites

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1. Purpose

1.1 DN Colleges Group Commitment

DN Colleges Group (DNCG) aims to provide all members of the DNCG community with the opportunities to engage with the highest quality of education, encouragement and support. We are committed to striving for excellence and ensuring that all students and apprentices are known, valued and can achieve.

1.2 Our core values are:

DN Colleges Group Values: ASPIRE

- **Ambition**– to achieve the highest standards
- **Support**– a caring, safe and inclusive environment
- **Partnership**– collaborative working to achieve shared goals
- **Innovation**– we use our initiative and are agile in finding creative solutions
- **Responsibility**– we take individual and collective responsibility
- **Equality**– we work with integrity and are open, honest and respectful of each other

DNCG is committed to safeguarding and promoting the well-being of all its students (student is a collective term used throughout the document to refer to any person who is in education including apprentices). Each student/apprentice's welfare is of paramount importance. We recognise that some students may be especially vulnerable to abuse. We recognise that students who are abused or neglected may find it difficult to develop a sense of self-worth and to view the world in a positive way. Whilst at DNCG, behaviour may be challenging.

We recognise that they may exhibit concerning behaviours and at times this may impact on other students either directly or indirectly. We will always take a considered and sensitive approach in order that we can support all our students.

We will establish an ethos where:

- students feel safe so that they can learn and develop
- students know there are adults they can talk to if they are worried
- students are equipped with the skills needed to stay safe and for providing opportunities for their personal development, behaviour and welfare (PDBA) throughout the student/apprentice journey.

1.3 The purpose of this policy is:

- to demonstrate DNCG's commitment with regard to Safeguarding, Child Protection and the Prevent Duty
- to state the responsibilities of DNCG in relation to safeguarding children, young people and vulnerable adults in response to current legislation and guidance
- to clarify roles and responsibilities of everyone within our DNCG in relation to Safeguarding, Child Protection and to keep students and apprentices safe from the risks of radicalisation, extremism and terrorism
- to have clear procedures that are followed when a student or apprentice is identified as needing more than universal services can provide. (All children and young people have access to a range of 'universal' services depending on how old they are, their stage of development and their individual needs. Universal services are provided by a range of

different agencies, including health and education. Health visitors, GPs and school nurses are all examples of universal services.)

- to ensure that appropriate action is taken in a timely manner to safeguard and promote the welfare of a student or apprentice
- to ensure that all staff are aware of their statutory responsibilities with respect to safeguarding and trained in recognising and reporting safeguarding issues
- To fulfil requirements of Section 175(4) of the Education Act 2002 which states that governing bodies of maintained schools (including maintained nursery schools), further education institutions and management committees of pupil referral units must have regard to any guidance given by the Secretary of State.

To ensure:

- All students and apprentices have a right to be protected, respected, valued and to be heard by:
 - the identification of students and/or apprentices deemed to be at risk of suffering from significant harm, radicalisation, exploitation or extremism
 - reducing the potential risks students and/or apprentices face of being exposed to violence, radicalisation, extremism, exploitation or bullying, harassment or victimisation
 - the safety, effective protection and prevention of maltreatment or impairment of health and development of children, young people and vulnerable adults, in line with DNCG Safeguarding and Child Protection Policy, local authority policies and procedures and government legislation
- DNCG responds effectively to the ideological challenge of terrorism and extremism and the risk of radicalisation.
- Good practice and responsibility for admission, within the context of inclusion, for individuals who present with a criminal conviction
- All staff demonstrate an awareness and understanding through effective communication and training
- The referral of all disclosures to the appropriate agencies, addressing concerns at the earliest possible stage using Early Help procedures
- Effective work in partnership with the Doncaster Children's Safeguarding Trust in Doncaster and the Children's Multi Agency Resilience and Safeguarding (MARS) arrangement in North Lincolnshire and any other local authority with whom DNCG works.
- In response to Covid-19, an addendum to the 2020 Safeguarding and Child Protection Policy was approved by the Senior Leadership Team in June 2020 and is available on request.

2 Scope

2.1 The Children Act 1989 defines a child as "a person under the age of 18". This could therefore include:

- Any student/apprentice up to the age of 18
- Siblings or other family members of any student/apprentice

- Any other persons under the age of 18 participating in College activities on College premises.

Under the Care Act 2004 safeguarding duties apply to adults (over the age of 18) who:

- Have needs for care and support (whether or not the local authority is meeting any of those needs) and
- Are experiencing, or are at risk of, abuse or neglect, and
- As a result of those care and support needs are unable to protect themselves from either the risk of, or the experience of abuse.

Within this context safeguarding can also include a range of potential issues such as:

- All forms of bullying, harassment and/or victimisation including cyber bullying (by text, on social media etc) and prejudice-based bullying, including hate crimes
- Radicalisation and extremist behaviour
- Child sexual exploitation in the context of young people
- Youth produced sexual imagery (sexting)
- Alcohol/substance misuse
- Risk management and the safety of others in relation to admissions and on-course students and apprentices
- Issues that may be specific within Doncaster or North Lincolnshire
- Particular issues in relation to domestic abuse, sexual exploitation, female genital mutilation (FGM) and forced marriage
- Sexual violence and sexual harassment within the context of peer-on-peer abuse
- Child/adult criminal exploitation within the context of County Lines
- Children, young people or vulnerable adults who are missing from home and/or education.

This policy extends to all DNCG employees, students, contractors, visitors and volunteers to whom DNCG has a duty of care and responsibility.

Safeguarding and promoting the welfare of children, young people and vulnerable adults is everyone's responsibility. Everyone who is in contact with children, young people or vulnerable adults and their families has a role to play. To fulfil this responsibility effectively, all staff should make sure their approach is student-centred. This means that they should always consider what is in the best interests of the student/apprentice.

This policy applies to all staff, volunteers, visitors, and governors in DNCG and is consistent with the procedures of the three safeguarding partners. Our policy and procedures also apply to extended DNCG and off-site activities.

We aim to work in partnership and have an important role in inter-agency safeguarding arrangements as set out by Working Together to Safeguard Children 2018 and Keeping Children Safe in Education 2021. Everyone working in or for DNCG shares an objective to help keep students safe by contributing to:

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

2.2 Safer recruitment

DNCG pays full regard to Keeping Children Safe in Education 2021 (Part 3). We ensure that all appropriate measures are applied in relation to everyone who works in DNCG.

In line with Working Together to Safeguard Children 2018 guidance, safer recruitment practice includes scrutinising applicants, verifying identity, academic and vocational qualifications, obtaining professional 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 all relevant safer recruitment checks, e.g., Enhanced Disclosure and Barring Service (DBS) and right to work in the UK checks, photographic ID, etc.

It is vital that DNCG creates a culture of safe recruitment and as part of that adopts recruitment procedures which help deter, reject or identify people who might abuse or might have abused children, young people and vulnerable adults. Decisions will be made about the suitability of prospective employees based on checks and evidence including, criminal record checks (DBS), barred list checks, references and recruitment and selection information following the principles of Working Together (2018).

As a measure of best practice DNCG requests disclosure of criminal conviction at the point of a student/apprentice's application and/or admission onto a DNCG programme or apprenticeship (or conviction if on programme). DNCG has a duty of care to all students, apprentices, staff and visitors to promote and protect wellbeing.

Within the context of risk DNCG will assess disclosed convictions in relation to:

- Applicants who pose an unacceptable risk to DNCG's community
- Applicants unable to meet particular professional or statutory requirements that exist for some courses

Under the Rehabilitation of Offenders Act 1974 spent convictions will be assessed according to factors in line with the offence, age and sentence received.

DNCG will maintain a secure single central record (SCR) for all staff (including teacher trainees) of pre-appointment checks, including:

- an identity check
- a barred list check
- an enhanced DBS check requested/certificate shown to DNCG
- a prohibition from teaching check
- further checks on people who have lived or worked outside the UK
- a check of professional qualifications, where required; and
- a check to establish the person's right to work in the United Kingdom

The details of an individual will be removed from the single central record once they no longer work at DNCG.

DBS renewals are managed by DNCG on a monthly cycle to ensure ongoing compliance.

Some children, young people and adults have an increased risk of abuse and additional barriers can exist for them with respect to recognising or disclosing it. We ensure that all students and apprentices have the same protection regardless of any barriers they may face. We give special consideration to students and apprentices who:

- have special educational needs (SEN) or disabilities

- are young carers
- may experience discrimination based on a protected characteristic:
 - Age
 - Disability
 - Gender Reassignment
 - Pregnancy and Maternity
 - Race (including ethnic or national origins, colour or nationality)
 - Religion or belief (including lack of religion or belief)
 - Sex (gender identity)
 - Sexual orientation (sexuality)
- have English as an additional language
- are known to be living in difficult situations e.g., temporary accommodation
- where there are issues such as substance misuse or domestic abuse
- are at risk of female genital mutilation (FGM), sexual exploitation, forced marriage or radicalisation
- are people who are seeking asylum or who are refugees
- are at risk due to either their own or a mental or physical health need of someone they live with
- are looked after or previously looked after.

3 Responsibilities

- 3.1 The Governing Body is committed to complying with local authority child protection and safeguarding policies, procedures and arrangements. It recognises that it has a responsibility towards children, young people and vulnerable adults and people attending or visiting DNCG to safeguard and promote their welfare and to take appropriate decisions about how this can be achieved. It is not the Governing Body's responsibility to investigate abuse.

Nevertheless, the Governing Body has a duty to act if there is a cause for concern and to notify the appropriate agencies so that they can investigate and take any necessary action. It has a duty to act if there is a cause for concern in relation to a potential threat or risk posed by any potential or existing members of staff or students to young people or vulnerable adults at DNCG.

3.2 **DNCG's Governing Body will ensure that:**

- governors hold an enhanced DBS check
- that there is a named Safeguarding Governor who is named in this policy and is assured that the Single Central Record is checked and in line with KCSiE 2021
- DNCG has an effective Safeguarding Child Protection and Prevent Policy supported by a prevent action plan and risk assessment and associated information in place which are in accordance with local authority guidance and locally agreed inter-agency procedures.
- Safeguarding Child Protection and Prevent Policy and associated information are available publicly via DNCG websites or on paper. The policy and associated information will be reviewed and updated on an annual basis or earlier if required
- DNCG has a Relationships at Work Policy, a Social Media Policy and a Code of Conduct made available to all staff and volunteers. These documents include

acceptable use of technology, staff/student relationships and communications including the use of social media

- DNCG operates safer recruitment procedures and makes sure that all appropriate checks are carried out on staff and volunteers who work with students; and that any panel involved in the recruitment of staff has at least one member who has undertaken the Safer Recruitment Training in line with Working Together to Safeguard Children 2018
- DNCG has procedures for dealing with allegations against staff and volunteers that comply with guidance from the local authority and locally agreed inter-agency procedures
- DNCG's Social Media Policy and associated Continuous Professional Development are in place and provided for staff and volunteers to ensure that there is a good understanding of safeguarding and child protection issues related to digital media.
- DNCG has appropriate electronic filtering and monitoring systems in place to ensure that students and apprentices are safeguarded from potentially harmful and inappropriate online material; whilst recognising that "over-blocking" should not lead to unreasonable restrictions as to what students and apprentices can be taught
- All staff have a responsibility for safeguarding children, young people and vulnerable adults and reporting concerns in line with procedures and policies.
- All staff need to be alert to the signs of harm and abuse and report any concerns. Part 1 of Keeping Children Safe in Education (KCSIE) 2021, will be provided to all staff as part of their induction. All staff are expected to read and understand KCSIE 2021, Part 1. In addition, staff should receive appropriate safeguarding and child protection training which is regularly updated. Updates will be provided via email, bulletins, staff meetings and training opportunities as required to provide them with the relevant skills and knowledge to safeguard students and apprentices effectively
- Two senior members of the DNCG's leadership team are appointed to the role of DSL who will take lead responsibility for safeguarding and child protection. This role is shared by:
 - Rachel Maguire, Chief People Officer
 - Sally Senior, Director of Safeguarding and Inclusion

DNCG has Deputy DSLs who are trained to the same standard as the lead DSLs. They are:

- Neil Lancaster
- Dawn Barraclough
- Andrea Liddement
- Paula Kelly
- Sally Macdonald
- Jayne Tarpy
- Zoe Green
- Caroline Hawkins

3.3 The CEO and the Principal will ensure that:

- the policies and associated information adopted by the Governing Body are fully implemented, and followed by all staff including volunteers/interns/and students on placement
- sufficient resources and time are allocated to enable the DSLs and DDSLs to discharge their responsibilities including taking part in strategy discussions and other inter-agency meetings and contributing to the assessments of children, young people and vulnerable adults
- there are arrangements in place for safeguarding supervision for the DSL and the DDSL(s)
- all staff including volunteers/interns/and students on placement feel able to raise concerns about poor or unsafe practice regarding students and such concerns are addressed sensitively and effectively in a timely manner in accordance with agreed whistle-blowing policies.

The NSPCC's 'What you can do to report abuse' dedicated helpline is available as an alternative route for staff who do not feel able to raise concerns regarding child protection internally or have concerns about the way a concern is being handled. Staff can call 0800 028 0285 – line is available from 8am-8pm Mon-Fri and email: help@nspcc.org.uk

- the DSLs and DDSLs are supported in providing a contact for the DNCG to provide a report and attend Initial Child Protection Case Conferences, reviews and Looked After Children Reviews out of DNCG term time when needed
- allegations regarding staff, volunteers or any other adults in DNCG are referred to the Local Authority Designated Officer (LADO), as set out in the Managing Allegations procedure
- staff undertake appropriate safeguarding training
- individuals are referred to the Disclosure and Barring Service by a DSL in cases where a person is dismissed or left due to risk/harm to a child, young person or vulnerable adult
- there is always adequate DSL cover during the DNCG day.

Rachel Maguire, DSL (as stated in KCSIE 2021) is a member of DNCG's Senior Leadership Team (SLT). Sally Senior, DSL, is a member of Rachel Maguire's senior team. Rachel Maguire and Sally Senior take lead responsibility for child protection and safeguarding and Prevent Duty.

For out of hours, external visits and trips and international trips, details of contacts are shared, see page 33.

The DSLs are expected to refer concerns

- where a person (staff, volunteer, applicant, student or apprentice) is dismissed or left DNCG due to risk/harm to a child/vulnerable adult to the Disclosure and Barring Service as required

- where a crime/potential crime may have been committed to the Police as required.
- to the Channel programme where there is a radicalisation concern as required and support DDSLs who make referrals to the Channel programme
- of suspected abuse and/or exploitation to the relevance local authority children's or adult social care or other agency as required
- support the DSLs as required when they refer cases of suspected abuse and/or exploitation to the relevance local authority children's or adult social care or other agency as required
- as required, liaise (as per Part Four KCSIE 2021) with the Local Authority Designated Officer(s) (LADO) for child protection/safeguarding concerns in cases which concern a staff member, volunteer or applicant to a DNCG programme

The DDSLs they are expected to refer cases:

- of suspected abuse and/or exploitation to the relevance local authority children's or adult social care or other agency as required
- where a crime/potential crime may have been committed to the police as required
- to the Channel programme where there is a radicalisation concern as required and support DDSLs who make referrals to the Channel programme

Working with others

The DSLs and DDSLs are expected to:

- act as a source of support, advice and expertise for all staff
- act as a point of contact with the safeguarding partners
- liaise with the principal to inform them of issues- especially ongoing enquiries under Section 47 of the Children Act 1989 and police investigations
- liaise with staff (especially teachers, pastoral support staff, teaching assistants and learning support assistants, ICT, the named persons with oversight for SEND, online and digital safety when deciding whether to make a referral by liaising with relevant agencies so that the needs of students are considered holistically
- liaise with the Counselling Team and appropriate external support services as required if a student/apprentice safeguarding concern is linked to mental health
- promote supportive engagement with parents and/or carers in safeguarding and promoting the welfare of students, including where families may be facing challenging circumstances
- take lead responsibility for promoting educational outcomes by knowing the welfare, safeguarding and child protection issues that children/young people, vulnerable adults are facing, or have experienced, and identifying the impact that these issues might be having on students' attendance, engagement and achievement at DNCG. This includes:

- ensure that the DSLs, DDSLs and Designated Teachers know who their cohort of students and apprentices are that have or have had a social worker, understanding their academic progress and achievement, and maintaining a culture of high aspirations for them
- support teaching and non-teaching staff to provide additional academic support or reasonable adjustments to help students who have or have had a social worker reach their potential, recognising that even when statutory social care intervention has ended, there is still a lasting impact on student's/apprentice's educational outcomes.

3.4 Undertake training

The DSLs and DDSLs will undergo training to provide them with the knowledge and skills required to carry out their role. This training will be updated at least every two years. They will also undertake Prevent/WRAP training.

In addition to the formal training, their knowledge and skills will be refreshed at regular intervals, as required, but at least annually, to allow them to understand emerging themes. This will be achieved by attending the termly DSL Safeguarding briefings and attending appropriate local authority/external training and/or conference opportunities so they:

- Understand the assessment process for providing early help and intervention
- Have a working knowledge of how the local authority conduct an initial child protection conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so
- Are alert to the specific needs of children in need, those with SEND and young carers
- Are able to keep detailed, accurate, secure written records of concerns and referrals
- Encourage from all staff and volunteers a culture of listening to students and apprentices and taking account of their wishes and feelings

Raise awareness

The DSLs and DDSLs should:

- Ensure each member of staff, especially new and part-time staff, has access to and understands the safeguarding and child protection policy and procedure, and has access to and records any concerns on CPOMS
- Ensure the safeguarding and child protection policy is reviewed annually, with any procedural changes implemented and reviewed regularly
- Ensure the child protection and safeguarding policy is available publicly and parents/carers are aware of the role of the DSL/DDSL and that referrals about suspected abuse may be made to Children's Services
- Ensure all staff have an awareness of safeguarding issues that can put students at risk of harm.

Supporting the student/apprentice and partnership with parents and carers

DNCG recognises that the student/apprentice's welfare is paramount. However, effective child protection and safeguarding practice and outcomes rely on a positive, open and honest working partnership with parents/carers. Whilst DNCG may, on occasion, need to make referrals without consultation with parents/carers, we will make every effort to maintain a positive working relationship with them whilst fulfilling our duties to protect someone in our care and will seek their permission and take a balanced decision in relation to who needs to know. DNCG's decision will always consider the risk of sharing information in relation to putting someone at risk of further harm by sharing information.

Students will be given a proper explanation (appropriate to age and understanding) of what action is being taken on their behalf and why, ensuring we will always hear and listen to their voice and ensure that we act in their best interests

We will endeavour always to preserve the privacy, dignity and right to confidentiality of the student/apprentice and their parents/carers. The DSL and DDSL will determine which members of staff "need to know" personal information and what they "need to know" for the purpose of supporting and protecting the student/apprentice.

Information sharing and managing the child protection file/record (CPOMS)

The DSLs and DDSLs are responsible for ensuring that child protection/safeguarding files are kept up to date. Information should be kept confidential and stored securely. Records will include:

- a clear and comprehensive summary of the concern
- details of how the concern was followed up and resolved
- a note of any action taken, decisions reached and the outcome

When students leave DNCG (including in-year transfers) the DSLs/DSLs should ensure their safeguarding/child protection file is transferred to the new school or college as soon as possible.

The child protection file should be transferred separately to the main student file and within 5 days for an in-year transfer or within the first 5 days of the start of a new term. This should be transferred separately from the main student file, ensuring secure transit, and confirmation of receipt should be obtained. Receiving schools and colleges should ensure key staff such as DSLs, DDSLs, SENCOs and named person with oversight for SEND, are aware as required.

All staff and volunteers will:

- receive regular CPD and other information e.g., in briefings in relation to Safeguarding, Child Protection and Prevent and will read and sign to say that they understand and will fully comply with DNCG's policies and procedures
- receive at least annual CPD and other information and will read and sign to say that they understand Parts 1 and 5 of Keeping Children Safe in Education
- identify concerns as early as possible and provide help, to prevent concerns from escalating and identify students who may need of extra help or who are suffering or are likely to suffer significant harm
- attend annual DNCG safeguarding training and other appropriate training identified
- provide a safe environment in which students can learn and work
- record on CPOMS of any concerns about a student/apprentice immediately and before 5pm at the latest
- inform the DSL of any concerns regarding senior postholders immediately. The DSL will then inform the Chair of Governors

- act on the concern and make the referral themselves if they feel the concern is not being taken seriously or escalate concerns to the Principal/Chair of Governors
- ensure that timely information sharing is essential to effective Safeguarding, Child Protection and Prevent
- ensure that fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety, of students
- ensure that the Data Protection Act (DPA) 2018 and GDPR do not prevent, or limit, the sharing of information for the purposes of keeping students safe
- never promise a student/apprentice that they will not tell anyone about a report of abuse, as this may not be in the student's/apprentice's best interests and may put them or others at risk of further harm
- speak to the DSL or DDSL immediately if they are in any doubt about sharing information
- in cases where a person has/may have/ be about to caused themselves significant harm, dial 999 or 112 immediately. No permission to do so is required.
- If there is likely to be a delay in the arrival of the ambulance, speak to Ambulance Control and accompany the person by taxi with another colleague
- Liaise with Ambulance Control and accompany the person by taxi with another colleague if there is likely to be a delay in the arrival of the ambulance
- Hand over to medical staff and the adult responsible for the student/adult at the hospital
- Immediately inform your line manager who will inform a DDSL/DSL
- Record the incident on CPOMs as soon as possible

Whilst DNCG may, on occasion, need to make referrals without consultation with parents/carers, we will make every effort to maintain a positive working relationship with them whilst fulfilling our duties to protect someone in our care and will seek their permission and take a balanced decision in relation to who needs to know. DNCG's decision will always consider the risk of sharing information in relation to putting someone at risk of further harm by sharing information.

4 Definitions and/or Relevant Legislation

The Children Act 1989 defines a child as person under the age of 18.

This policy accordingly applies to children/young people and all vulnerable adults.

Working Together to Safeguard Children 2018, statutory guidance published by HM Government, sets out the guidance on child protection for all staff, including those in further education.

Colleges should be aware of the need to alert Social Care/Children's Services, the NSPCC or the Police, where they believe a child, young person, EHCP students to the age of 25, or vulnerable adult has been abused or is at risk of abuse. This would also include children, young people and vulnerable adults who are at risk of peer-on-peer abuse, FGM, criminal and sexual exploitation (including county lines), those missing in education, running away and who may be bullying or being bullied.

Vulnerable Adult

A vulnerable adult refers to any person over the age of 18 years who amongst other indicators:

- Is or may be need community care services by reason of mental or other disability, age or illness
- Is or may be unable to take care of themselves

- Is or may be unable to protect themselves against significant harm or serious exploitation
- This policy accordingly applies to vulnerable adults.

Forms of abuse and safeguarding/child protection issues

Harm means ill-treatment or impairment of health and development, including, e.g., impairment suffered from seeing or hearing the ill-treatment of another

Development means physical, intellectual, emotional, social or behavioural development

Health includes physical and mental health; maltreatment includes sexual abuse and other forms of ill-treatment which are not physical.

Types of abuse

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

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

Recognising Physical Abuse

The following are often regarded as indicators of concern:

- An explanation which is inconsistent with an injury.
- Several different explanations provided for an injury.
- Unexplained delay in seeking treatment.
- The parents/carers are uninterested or undisturbed by an accident or injury.
- Parents/carers are absent without good reason when their child is presented for treatment.
- Repeated presentation of minor injuries (which may represent a “cry for help” and if ignored could lead to a more serious injury).
- Family use of different doctors and A&E departments.
- Reluctance to give information or mention previous injuries.

Emotional abuse: the persistent emotional maltreatment of a student/apprentice such as to cause severe and adverse effects on the student’s/apprentice’s emotional development. It may involve conveying to a student/apprentice 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 student/apprentice 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 students. These may include interactions that are beyond a student’s/apprentice’s developmental capability as well as overprotection and limitation of exploration and learning or preventing the student/apprentice from participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing students frequently to feel frightened or in danger, or the exploitation or corruption of students. Some level of emotional abuse is involved in all types of maltreatment of a student/apprentice, although it may occur alone.

The following may be indicators of emotional abuse:

- Developmental delay.
- Abnormal attachment between a student/apprentice and parent/carer e.g., anxious, indiscriminate or no attachment
- Indiscriminate attachment or failure to attach
- Aggressive behaviour towards others
- Victimised within the family
- Low self-esteem and lack of confidence
- Withdrawn or seen as a “loner” – difficulty relating to others.

Sexual abuse: involves forcing or enticing a student/apprentice to take part in sexual activities, not necessarily involving violence, whether or not the student/apprentice is aware of what is happening. The activities may involve physical contact, including assault by penetration e.g., 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 students in looking at, or in the production of, sexual images, watching sexual activities, encouraging students to behave in sexually inappropriate ways, or grooming a student/apprentice in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can children. The sexual abuse of children by other children is a specific safeguarding issue (also known as peer-on- peer abuse) in education and all staff should be aware of it.

Some behavioural indicators associated with this form of sexual abuse are:

- Inappropriate sexualised conduct.
- Sexually explicit behaviour or language, inappropriate to the student’s/apprentice’s age
- Self-harm (including eating disorder), self-mutilation and suicide attempts.
- Involvement in prostitution or indiscriminate choice of sexual partners

Some physical indicators associated with this form of abuse are:

- Pain or itching of genital area
- Pregnancy in a student under the age of sixteen
- Physical symptoms such as injuries to the genital or anal area, bruising to buttocks, abdomen and thighs, sexually transmitted infections.

Neglect: the persistent failure to meet a student’s/apprentice’s basic physical and/or psychological needs, likely to result in the serious impairment of their health or development.

Neglect may occur during pregnancy, for example, as a result of maternal substance abuse.

After 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 student/apprentice 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 student’s/apprentice’s basic emotional needs. Evidence of neglect is built up over time and can cover different aspects of parenting/caring.

Indicators include:

- Failure by parents or carers to meet the basic essential needs e.g., adequate food, clothes, warmth, hygiene and medical or dental care
- A student/apprentice seen to be listless, apathetic and unresponsive with no apparent medical cause
- Student/apprentice appears to thrive away from home environment
- Student/apprentice frequently absent from College
- Student/apprentice left with adults who are intoxicated or violent
- Student/apprentice abandoned or left alone for excessive period

All staff should have an awareness of safeguarding issues that can put students at risk of harm.

Bullying

Children, young people and vulnerable adults can experience bullying which is deliberately hurtful and harmful behaviour often repeated over a period of time and may not know how to access support.

Bullying may take many forms, including physical attacks, verbal (which would include name-calling, threats, racist or homophobic/biphobic or transphobic remarks) and emotional (for example, isolating an individual from the activities and social acceptance of other students). Cyberbullying involves making use of the internet or mobile phones to taunt intimidate or threaten.

The damage inflicted by bullying must not be under-estimated; it can cause considerable distress, affect the student/apprentice's health and development and cause significant harm.

Where any staff member suspects bullying, they must report the suspicion to their line manager who must investigate and, where appropriate, invoke the DNCG Student and Apprentice Policy: Prevention from Bullying, Victimisation and Harassment.

Child abduction and community safety incidents

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

As children get older and gain more independence, it is important they are given practical advice on how to keep themselves safe. Further information is available at: [Action Against Abduction](#) and [Clever Never Goes](#).

Children and the court system

Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. There are two age-appropriate guides to support children 5-11 year olds and 12-17 year olds. The guides explain each step of the process, support and special measures that are available. There are diagrams illustrating the courtroom structure and the use of video links is explained. Making child arrangements via the family courts following separation can be stressful and entrench conflict in families. This can be stressful for children. The Ministry of Justice has launched an online child arrangements information tool with clear and concise information on the dispute resolution service. This may be useful for some parents and carers.

Further information is available at [Get help with child arrangements](#).

Children Missing in Education (CME)

All staff should be aware that unauthorised or unexplained absence of students or apprentices may mean they are missing from education. In Safeguarding and Child Protection this is referred to as Children Missing in Education.

Early intervention is necessary to identify the existence of any underlying safeguarding risk and to help prevent the risks of a student/apprentice from going missing in future. Staff should be aware of and follow DNCG's The College's Attendance Policy and Process for Unauthorised Absence which sets out DNCG's approach to student absence and is available on the intranet or on paper.

Unauthorised or Unexplained Absence of Students May Mean There is a Safeguarding or Child Protection Concern

Students who are missing from education may mean that they are at risk of abuse or are being abused.

This may include:

- Sexual Abuse including online
- Physical Abuse
- Child Sexual Exploitation & trafficking
- Child Criminal Exploitation which may also be a sign of involvement in County Lines
- Emotional Abuse
- Neglect
- Domestic Abuse
- Radicalisation and extremism
- "Honour-based" abuse
- Forced Marriage
- Risk of Female Genital Mutilation (FGM)
- Wellbeing/mental health issues
- Risk of substance abuse or substance misuse
- Risk of travelling to conflict zones
- Other issues not listed but posing a risk i.e., fabricated or induced illness, up-skirting, etc

All staff and volunteers should be familiar with DNCG's Attendance Policy and Process for Unauthorised Absence which set out DNCG's approach to student absence and should pay particular attention to attendance patterns before and after the end/start of a half-term or term.

DNCG recognises the need to identify 'at-risk' students early and develop a plan to support such students e.g., by sending "Miss You" attendance cards or by authorised staff carrying out a home visit. Strategies will always be put in place to re-integrate the student/apprentice into education.

If you require further information or support, please contact the Safeguarding Team.

Children with family members in prison

DNCG understands that students with a parent(s) in prison may be at risk of poor outcomes including poverty, stigma, isolation and poor mental health. They may require specific services and support. This may take the form of an Early Help Assessment and/or a referral to Student Welfare. Families and children of people in prison are regarded as families first and DNCG will work to ensure their needs are appropriately met. This will include providing support to ensure the voice of the student/apprentice is considered.

Child Criminal Exploitation (CCE) and Child Sexual Exploitation (CSE)

DNCG is aware that CSE is a form of child sexual abuse. We know that different forms of harm often overlap, and that perpetrators may subject students to multiple forms of abuse, such as criminal exploitation (including county lines) and sexual exploitation. In some cases, the exploitation or abuse will be in exchange for something the victim needs or wants (for example, money, gifts or affection) and/or will be to the financial benefit or other advantage, such as increased status, of the perpetrator or facilitator. Students can be exploited by adults, irrespective of gender identity, as individuals or in groups. They may also be exploited by other children, who themselves may be experiencing exploitation – where this is the case, it is important that the child perpetrator is also recognised as a victim.

Whilst the age of the student/apprentice may be a contributing factor for an imbalance of power, there are a range of other factors that could make a student/apprentice more vulnerable to exploitation including gender, sexual identity, cognitive ability, learning difficulties, communication ability, physical strength, status, and access to economic or other resources. Some of the following can be indicators of both child criminal and sexual exploitation where students:

- appear with unexplained gifts, money or new possessions
- associate with other children involved in exploitation
- suffer from changes in emotional well-being
- misuse drugs and alcohol
- go missing for periods of time or regularly come home late and
- regularly miss DNCG or do not take part in education

Please visit [Child sexual exploitation: definition and guide](#) and [CSE procedure](#) for the full guidance.

Financial: including theft, fraud, exploitation, pressure in connection with Wills, property or inheritance for financial transactions, or the misuse or misappropriation of property.

Peer-on-peer sexual violence and sexual harassment

Sexual violence and sexual harassment can occur between two children of any age and sex, from primary through to secondary stage and into college. It can occur through a group of students sexually assaulting or sexually harassing a single student/apprentice or group of students. Sexual violence and sexual harassment exist on a continuum and may overlap; they can occur online and face to face (both physically and verbally) and are never acceptable.

Students who are victims of sexual violence and sexual harassment wherever it happens, will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) also attends DNCG.

Please visit [Sexual violence and sexual harassment between children in schools and colleges](#) for full guidance.

Child trafficking and modern slavery

Children are trafficked for:

- child sexual exploitation
- criminal activity, including:
 - cannabis cultivation
 - street crime – such as pickpocketing, begging and bag theft
 - moving drugs
 - benefit fraud
 - immigration fraud

- selling pirated goods
- forced marriage
- domestic servitude, including:
 - cleaning
 - childcare
 - cooking
- forced labour, including working in:
 - restaurants
 - nail bars
 - factories
 - agriculture
- illegal adoption
- unreported private fostering arrangements (for any exploitative purpose)

This list is not exhaustive and children who are trafficked are often exploited in more than one way.

How child trafficking happens

Traffickers may use grooming techniques to gain the trust of a child, family or community. They may trick, force or persuade children to leave their homes. Child trafficking can involve a network of organised criminals who recruit, transport and exploit children and young people within or across borders. Some people in the network might not be directly involved in trafficking a child but play a part in other ways such as falsifying documents, bribery, owning or renting premises or money laundering (Europol, 2011). Child trafficking can also be organised by individuals and children's own families.

The Counter-Terrorism and Security Act 2015 and The Prevent Duty 2015 and revised guidance from 2019 and 2021

DNCG and other colleges are subject to a duty under Section 26 of the Counter-Terrorism and Security Act 2015 (the CTSA 2015), in the exercise of their functions, to have “due regard to the need to prevent people from being drawn into terrorism”. This duty is known as the Prevent Duty.

The Counter Terrorism & Security Act (2015) & The Prevent Duty. Prevent is 1 of the 4 elements of CONTEST; the Government's Counter Terrorism Strategy. It aims to stop people becoming terrorists or supporting terrorism.

The Prevent Strategy:

- Responds to the ideological challenge faced from terrorism and aspects of extremism and the threat we face from those who promote these views
- Provides practical help to prevent people from being drawn into terrorism and ensure individuals are given appropriate advice and support
- Works with a wide range of sectors (including education, criminal justice, faith, charities, online health) where there are risks of radicalisation. The strategy covers all forms of terrorism including far right extremism and some aspects of non-violent terrorism.

DNCG will ensure that it is aware of the risks and monitors and deals with them effectively by:

- Understanding the threat from violent extremism and potential risks from external influences
- Ensuring plans are in place to respond appropriately to a threat or incident
- Having effective ICT security and IT Use and Misuse Policies
- Responding appropriately to a threat or incident locally, nationally or internationally as it will impact the College community

- Using DNCG Risk Assessment procedures and monitoring visiting speakers.

The DNCG response to its role in the context of preventing radicalisation and extremism is to:

- Work in partnership with organisations involved in Prevent strategies
- Ensure staff, students and employers understand their responsibility in preventing violent extremism
- Provide support and make appropriate referrals for students at risk of radicalisation
- Support interfaith and intercultural engagement through external partnership working and volunteer faith representatives
- Ensure that DNCG has a zero-tolerance approach to bullying and harassment
- Listen and respond effectively to issues within DNCG and our local communities.

The Prevent Duty is part of DNCG's wider safeguarding obligations. The DSLs/DDSLs and other senior leaders are familiar with the Prevent Duty guidance; more information can be found at [Prevent duty guidance](#).

Staff should report concerns about a student or apprentice being at risk of radicalisation, extremism or terrorism to the Safeguarding Team via CPOMS.

County lines

County lines is a form of criminal exploitation where urban gangs persuade, coerce or force children and young people to store drugs and money and/or transport them to suburban areas, market towns and coastal towns (Home Office, 2018). Young people do the majority of the work and take the most risk

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs using dedicated mobile phone lines or other form of "deal line". This activity can happen locally as well as across the UK - no specified distance of travel is required. Children and vulnerable adults are exploited to move, store and sell drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims.

Students can be targeted and recruited into county lines in a number of locations including schools (mainstream and special), further and higher educational institutions, pupil referral units, children's homes and care homes.

Students are also increasingly being targeted and recruited online using social media. Students can easily become trapped by this type of exploitation as county lines gangs can manufacture drug debts which need to be worked off or threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

A number of the indicators for CSE and CCE as detailed above may be applicable to where students are involved in county lines. Some additional specific indicators that may be present where a student/apprentice is criminally exploited through involvement in county lines are students who:

- go missing and are subsequently found in areas away from their home
- have been the victim or perpetrator of serious violence (e.g., knife crime)
- are involved in receiving requests for drugs via a phone line, moving drugs, handing over and collecting money for drugs
- are exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection
- are found in accommodation that they have no connection with, often called a 'trap house or cuckooing' or hotel room where there is drug activity

- owe a 'debt bond' to their exploiters
- have their bank accounts used to facilitate drug-dealing

Further information can be found at: <https://learning.nspcc.org.uk/child-abuse-and-neglect/county-lines>

Cybercrime

Students with skill and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime. If there are concerns about a student/apprentice in this area, the DSL or DDSL should consider referring into the Cyber Choices programme. This is a nationwide police programme supported by the Home Office and led by the National Crime Agency, working with regional and local policing. The programme aims to intervene where children, young people or vulnerable adults are at risk of committing, or being drawn into, low level cyber-dependent offences and divert them to a more positive use of their skills and interests.

Domestic abuse

All students can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Experiencing domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a student/apprentice may blame themselves for the abuse or may have had to leave the family home as a result.

Students can also experience domestic abuse within their own intimate relationships. This form of peer-on-peer abuse is sometimes referred to as 'teenage relationship abuse'. Depending on the age of the students, this may not be recognised in law under the statutory definition of 'domestic abuse' (if one or both parties are under 16). However, as with any child under 18, where there are concerns about safety or welfare, safeguarding procedures should be followed and both young victims and young perpetrators should be offered support. Please visit [Young people and domestic abuse](#) for further support.

Female Genital Mutilation (FGM)

FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences. More information can be found at [FGM- information and resources](#) and [FGM: multi-agency statutory guidance](#).

Forced marriage

Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some perpetrators use perceived cultural practices as a way to coerce a person into marriage. DNCG can play an important role in safeguarding students from forced marriage.

Please visit [Multi-agency statutory guidance for dealing with forced marriage](#) and [HM Government Multi-agency practice guidelines: Handling cases of Forced Marriage](#) for further guidance.

“Honour-based” abuse (including Female Genital Mutilation and Forced Marriage)

“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 student/apprentice being at risk of HBA, or already having suffered HBA.

Mental health

Where students have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these student's/apprentice's experiences, can impact on their mental health, behaviour, and education. We identify students in need of extra mental health support, this includes working with external agencies. More information can be found at [Mental Health and Behaviour in Schools](#).

Modern Slavery and the National Referral Mechanism

Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs. More information can be found at [Modern slavery](#).

Online Safety

We ensure that students are taught about safeguarding, including online safety as part of a broad and balanced curriculum. Online abuse is any type of abuse that happens on the internet, facilitated through technology. It can include:

- bullying
- emotional abuse
- sexual abuse
- sexual exploitation
- sexting (request for nudes)

[Keeping children safe in education 2021](#) (Annex D) provides a range of information and support to keep students safe online.

Operation Encompass

Operation Encompass operates in all police forces across England. It helps police and schools/colleges work together to provide emotional and practical help to children. The system ensures that when police are called to an incident of domestic abuse, where there are children in the household who have experienced the domestic incident, the police will inform the DSL in DNCG before the student(s)/apprentice(s) arrive at DNCG the following day. This ensures that the DNCG has up to date relevant information about the student's/apprentice's circumstances and can enable immediate support to be put in place, according to the student's/apprentice's needs. Operation Encompass does not replace statutory safeguarding procedures. Where appropriate, the police and/or DNCG should make a referral to children's social care if they are concerned about a child's welfare. More information can be found at [Operation Encompass](#).

Peer-on-peer/child-on-child abuse

Children can abuse other children (often referred to as peer-on-peer abuse) and it can take many forms. It can happen both inside and outside of DNCG as well as online. It is important that all staff recognise the indicators and signs of peer-on-peer abuse and know how to identify it and respond to reports. This can include, but is not limited to: bullying (including cyberbullying, prejudice-based and discriminatory bullying); abuse within intimate partner relationships; physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm; sexual violence and sexual harassment; consensual and non-

consensual sharing of nudes and semi-nudes images and/or videos; 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; up skirting and initiation/hazing type violence and rituals. Addressing inappropriate behaviour (even if it appears to be relatively innocuous) can be an important intervention that helps prevent problematic, abusive and/or violent behaviour in the future.

Private fostering

Private fostering occurs when a child under the age of 16 (under 18 for children with a disability) is provided with care and accommodation by a person who is not a parent, person with parental responsibility for them or a relative in their own home.

A child is not privately fostered if the person caring for and accommodating them has done so for less than 28 days and does not intend to do so for longer. Such arrangements may come to the attention of DNCG staff through the normal course of their interaction, and promotion of learning activities, with students. Where the arrangements come to the attention of DNCG we will notify the local authority to allow the local authority to check the arrangement is suitable and safe for the student/apprentice. More information can be found at [Private Fostering \(CA 1989\)](#).

Radicalisation

Students are vulnerable to extremist ideology and radicalisation.

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 those of different faiths and beliefs and those without. 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.

The DSLs/DDSLs are aware of the local procedures for making a Prevent referral. Further information can be accessed at [Prevent Duty guidance](#) and [Channel and Prevent Multi-Agency Panel guidance](#), which is a voluntary, confidential support programme which focuses on providing support at an early stage to students who are identified as being vulnerable to being drawn into terrorism.

Sexual violence and sexual harassment

Sexual violence and sexual harassment can occur between two children of any age and sex from primary to secondary stage and into college. It can also occur online. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This is very likely to have an adverse impact on their educational attainment and will be exacerbated if the alleged perpetrator(s) attends DNCG. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and face to face (both physically and verbally) and are never acceptable. It is essential that all victims are reassured 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 sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report. Staff should be aware that some groups are potentially more at risk.

It is important that DNCG staff are aware of sexual violence and the fact students can, and sometimes do, abuse their peers in this way and that it can happen both inside and outside of

DNCG. When referring to sexual violence we are referring to sexual violence offences under the Sexual Offences Act 2003 as described below:

Rape: A person (A) commits an offence of rape if: they intentionally penetrate the vagina, anus or mouth of another person (B) with their penis, B does not consent to the penetration and A does not reasonably believe that B consents.

Assault by Penetration: A person (A) commits an offence if: they intentionally penetrate the vagina or anus of another person (B) with a part of their body or anything else, the penetration is sexual, B does not consent to the penetration and A does not reasonably believe that B consents.

Sexual Assault: A person (A) commits an offence of sexual assault if: they intentionally touch another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents.

Staff and volunteers should be aware that sexual assault covers a very wide range of behaviour so a single act of kissing someone without their consent or touching someone's bottom/breasts/genitalia without consent, can still constitute sexual assault.

Causing someone to engage in sexual activity without consent: A person (A) commits an offence if: they intentionally cause another person (B) to engage in an activity, the activity is sexual, B does not consent to engaging in the activity, and A does not reasonably believe that B consents. (This could include forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party).

What is consent?

Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another, e.g., to vaginal but not anal sex or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity and each time activity occurs. Someone consents to vaginal, anal, digital or oral penetration only if they agree by choice to that penetration and they have the freedom and capacity to make that choice.

Further information can be accessed at [Sexual Consent](#).

Sexual harassment

When referring to sexual harassment we mean 'unwanted conduct of a sexual nature' that can occur online and offline and both inside and outside of DNCG. When we reference sexual harassment, we do so in the context of peer-on-peer sexual harassment. Sexual harassment is likely to: violate a person's dignity and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment.

Whilst not intended to be an exhaustive list, sexual harassment can include:

- sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names
- sexual "jokes" or taunting
- physical behaviour, such as: deliberately brushing against someone, interfering with someone's clothes (DNCG should be considering when any of this crosses a line into sexual violence - it is important to talk to and consider the experience of the victim) and displaying pictures, photos or drawings of a sexual nature
- online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence. It may include:
 - consensual and non-consensual sharing of nudes and semi-nudes images and/or videos. Further information is available at [Sharing Nudes](#).

- sharing of unwanted explicit content
- upskirting (which is a criminal offence)
- sexualised online bullying
- unwanted sexual comments and messages, including, on social media
- sexual exploitation; coercion and threats.

Further information is available from [Preventing harmful sexual behaviour in children - Stop It Now.](#)

Upskirting

The Voyeurism (Offences) Act 2019, which is commonly known as the Upskirting Act, came into force on 12 April 2019. 'Upskirting' is where someone takes a picture under a person's clothing (not necessarily a skirt) without their permission and or knowledge, with the intention of viewing their genitals or bottom (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is a criminal offence. Anyone of any sex, can be a victim.

Definitions and or relevant legislation and guidance

DNCG will follow the statutory guidance in [KCSIE 2021](#) Part 5, where full details can be found

- [Children's MARS Board](#)
- [Doncaster Children's Services Trust](#)
- [Keeping children safe in education 2021](#)
- [Working Together to Safeguard Children 2018](#)
- [What to do if you're worried a child is being abused](#)
- [Information sharing: Advice for practitioners](#)
- [Children Act 1989](#) and [Children Act 2004](#)
- [The Children and Families Act 2014](#)
- [Sexual violence and sexual harassment between children in schools](#)
- [Sharing nudes and semi-nudes: advice for education settings working with children and young people](#)
- [Teachers' Standards \(update July 2021\)](#)
- [ETF standards for teachers and trainers \(2014\)](#)
- [Inspecting Safeguarding in early years education and skills - Statutory Guidance \(updated 2021\)](#)

5 The Policy

DNCG believes that safeguarding students is its paramount concern and therefore Safeguarding, Child Protection and Prevent issues take priority in relation to any other policies and/or procedures.

This policy is intended to safeguard and promote the welfare of children, young people and vulnerable adults who are students or apprentices of DNCG. Its aim is to provide an environment in which everyone feels secure and supported.

The Governing Body is committed to ensuring that this duty of care is DNCG's paramount concern.

Therefore, within statutory requirements DNCG recognises that safeguarding and promoting the welfare of children, young people and vulnerable adults is everyone's responsibility. Everyone who is in contact with children and their families has a role to play. In order to fulfil this responsibility effectively, all practitioners should make sure their approach is student-

centred. This means that they should consider, at all times, what is in the best interests of the student/apprentice.

Members of staff have a legal and moral responsibility to ensure that all children, young people and vulnerable adults are protected from harm. All complaints, allegations or suspicions must be taken seriously. There is also a responsibility for the welfare of children, young people and vulnerable adults where to ignore such issues may result in harm.

Student/apprentice information/Information about the child, young person or vulnerable adult

In order to keep students and apprentices safe and provide appropriate care for them, accurate and up-to-date information is required regarding:

- Names, contact details and relationship to the student/apprentice of any persons with whom the student/apprentice normally lives
- Names and contact details of persons with parental responsibility (if different from above)
- Emergency contact details (if different from above). We encourage all parents/carers to provide more than one emergency contact, providing DNCG with additional options to contact a responsible adult when a child missing education is identified as a welfare and/or safeguarding concern
- Details of any persons authorised to collect the student/apprentice from DNCG (if different from above)
- Any relevant court orders in place including those with affect any person's access to the student/apprentice (e.g., Residence Order, Contact Order, Care Order, Injunctions etc)
- If the student/apprentice is or has been supported on a Child Protection Plan
- If the student/apprentice is or has been supported through an Early Help Assessment (EHA), Child in Need (CIN) or Team Around the Child (TAC) process
- If the student/apprentice is Looked After Child (LAC) or previously looked after
- Name and contact details of GP
- Any other factors which may impact on the safety and welfare of the student/apprentice

DNCG will collate, store and agree access to this information, ensuring all information held electronically is stored securely with due regard to meeting the data protection and safeguarding requirements.

Transfer of files

When a student/apprentice leaves DNCG, the pupil record, including child protection file which is separated from the main pupil record, is transferred to the new school or college as soon as possible. The child protection file is clearly marked Child Protection, confidential, for the attention of the DSL and a receipt of this transfer will be retained.

This information should be added to a record of transfer which the sending DNCG keep until the student/apprentice reaches their 25th birthday and must contain:

- Name and DOB of the student/apprentice
- Name and address of the receiving school/college
- Date file(s) transferred with name and role of person who received it
- Date sending DNCG received confirmation of receipt of files from receiving school/college
- Summary of case at the time of transfer e.g., Child Protection Plan: Neglect

In addition to the child protection file, the DSL should also consider if it would be appropriate to share any information with the new school or college in advance of a student/apprentice leaving. For example, information that would allow the new school or college to continue supporting victims of abuse and have that support in place for when the student/apprentice arrives.

Electronic documents that relate to the student/apprentice file also need to be transferred, or, if duplicated in a master paper file, destroyed.

Sending schools/colleges do not need to keep copies of any records in the student/apprentice record except if there is an ongoing legal action when the student/apprentice leaves the DNCG.

Custody of and responsibility for the records passes to the school/college the student/young person transfers to.

The school/college which the student/apprentice attended until statutory school leaving age is responsible for retaining the student/apprentice record until the student/apprentice reaches the age of 25 years. This school/college retains a copy of the student's/apprentice's chronology and any documents that DNCG created e.g., risk assessment in an archive, until the student/apprentice reaches the age of 25 years, the receipt of the transferred file is kept alongside this archive. Any archived files are stored securely in the same way as an active file. If any records relating to child protection issues are placed on the pupil file, it should be in a sealed envelope and then retained for the same period of time as the student file. (DOB + 25 years). The Safeguarding Team are responsible for sending such files.

All staff follow DNCG's Safeguarding, Child Protection and Prevent Policy which is consistent with 'Working Together to Safeguard Children 2018', Keeping Children Safe in Education 2021 and Prevent Duty Guidance 2015 and 2021 and local authority requirements.

All staff will also have an awareness of specific safeguarding issues, in particular Domestic Abuse, Child Criminal Exploitation (CCE), Child Sexual Exploitation (CSE), Radicalisation and the Prevent Duty, Female Genital Mutilation (FGM), Attendance and Children Missing from Education (CME) and Risk of Abuse Outside the Home (ROTH).

Staff will also be aware that behaviours linked to drug taking, alcohol abuse, truanting and sexting put students in danger. All staff will also be aware that safeguarding issues can manifest themselves via peer-on-peer abuse. This is most likely to include, but not limited to: bullying (including cyber bullying), gender-based violence/sexual harassment and sexting. Staff are clear as to DNCG's policy and procedures with regards to peer-on-peer abuse.

Concerns staff must act on immediately and report:

- any suspicion that a student/apprentice is injured, marked, or bruised in a way which is not readily attributable to the normal knocks or scrapes received in play
- any explanation given which appears inconsistent or suspicious
- any behaviours which give rise to suspicions that a student/apprentice may have suffered harm (e.g., worrying work, behaviour or language)

- any concerns that a student/apprentice may be suffering from inadequate care, ill treatment, or emotional maltreatment
- any concerns that a student/apprentice is presenting signs or symptoms of any form of abuse
- any significant changes in a student/apprentice's presentation, including non-attendance
- any hint or disclosure of abuse from any person
- any concerns regarding person(s) who may pose a risk to students (e.g., living in a household with children present)
- any potential indicators of Child Criminal Exploitation (CCE) or Child Sexual Exploitation (CSE)
- any potential indicators of Female Genital Mutilation (FGM)
- any potential indicators of radicalisation
- any potential indicators of living in a household with domestic abuse
- a referral to Children's Services, Adult Social Care and/or police must be made immediately if a student/apprentice is suffering or likely to suffer harm or is in immediate danger.

Responding to disclosure

Staff will not investigate but will, wherever possible, elicit enough information to pass on to the DSL or DDSL in order that they can make an informed decision of what to do next.

The DSL/DDSL will ensure that the student/apprentice's wishes and feelings are taken into account when determining what action to take and what services to provide. Child protection and safeguarding processes will operate with the best interests of the student/apprentice at their core.

Staff will:

- listen to and take seriously any disclosure or information that a student/apprentice may be at risk of harm
- try to ensure that the student/apprentice who is disclosing does not have to speak to another member of DNCG staff
- clarify the information
- try to keep questions to a minimum and of an 'open' nature e.g., using TED technique – "Tell me, Explain to me, Describe to me...."
- try not to show signs of shock, horror or surprise
- not express feelings or judgements regarding any person alleged to have harmed the student/apprentice
- explain sensitively to the person that they have a responsibility to refer the information to the DDSL/DSL. Students and apprentices need to know that staff may not be able to uphold confidentiality where there are concerns about their safety or that of someone else. Staff will always act with integrity and will not interview without consent
- reassure and support the person as far as possible
- explain that only those who 'need to know' will be told
- explain what will happen next and who will be involved as appropriate
- record details the same working day as they have received the disclosure or concern on DNCG's electronic system Child Protection Online Management System (CPOMS) including date and time and what the student/apprentice has said in the student/apprentice's words
- record the context and content of their involvement, and distinguish between fact, opinion and hearsay.

Action by the DSLs or DDSLs

Following any information raising concern, the DSL/DDSL will consider:

- any urgent medical needs of the student/apprentice
- whether the student/apprentice is receiving Early Help/A Child in Need/subject to a Team Around the Child/on a child protection plan
- discussing the matter with other agencies involved with the family
- consulting with appropriate persons e.g., Duty and Advice Team
- the student/apprentice's wishes.

Then decide:

- to talk to parents/carers, unless to do so may place a student/apprentice at risk of significant harm, impede any police investigation and/ or place the member of staff or others at risk
- whether to make a child protection referral to Children's/Adult Social Care because a student/apprentice person is suffering or is likely to suffer significant harm and if this referral needs to be made immediately.
- As stated in Section 3 of this policy, in cases where a person has/may have/ be about to caused themselves significant harm, dial 999 or 112 immediately. No permission to do so is required.
- If there is likely to be a delay in the arrival of the ambulance, speak to Ambulance Control and accompany the person by taxi with another colleague
- Hand over to medical staff and the adult responsible for the student/apprentice at the hospital
- Immediately inform your line manager who will inform a DDSL/DSL
- Record the incident on CPOMs as soon as possible

Action following a Safeguarding, Child Protection or Prevent referral

The DSL/DDSL or other appropriate member of staff will:

- make regular contact with the e.g., social worker involved to stay informed
- wherever possible, contribute to the strategy discussion
- provide a report for, attend and contribute to any subsequent child protection conference
- if the student(s)/apprentice(s) are made the subject of a child protection plan, contribute to the child protection plan and attend core group meetings and review conferences
- where possible, share all reports with the student/apprentice/parents/carers prior to meetings
- where in disagreement with a decision and concerns still remain will follow the relevant local authority escalation and professional resolution procedure.

Allegation of Abuse

When a member of staff suspects that any student may have been subject to abuse, or a student has disclosed that abuse has taken place, either to themselves or another student, the allegation must be reported immediately via CPOMS to the Designated Safeguarding Lead (DSL) or the Deputy DSL, unless it relates to these people. The DSL/DDSL will ensure the allegation is acted on immediately, in accordance with the local authority procedures. If required, a risk assessment will be carried out to determine the timescales and escalation of the allegation.

Guidance for all Staff on Dealing with Disclosure / Suspected Abuse / Neglect

Dealing with disclosures of abuse:

- Always listen carefully and quietly – do not press for any evidence at all
- Remain calm and reassuring – do not dismiss the disclosure – do not show distress or concern
- Do not refute the allegation
- Show that you care through open and reassuring facial and body language
- Do not interrogate or ask leading questions (it could later undermine a case). Use of the TED questions; (“Tell me, Explain to me, Describe to me”)
- Ensure you take a written verbatim account of the student’s/apprentice’s disclosure and record this the same day on CPOMs

At this point, take the following steps:

- Explain to the student/apprentice that the disclosure must be reported – emphasise your trust in them
- Do not promise to keep the allegation secret or that ‘everything will be alright’
- Reassure by telling the student that they have done the right thing in telling you, do not offer physical reassurance
- Do not admonish in any way e.g. ‘I wish you had told me sooner’
- Report the incident on CPOMS immediately and by 5pm the same day at the latest
- Under no circumstances discuss the matter with any other person - if the allegations prove to be untrue, any such discussion would be deemed defamatory. Information to staff is on a ‘need to know’ basis at the discretion of the DSL/DDSL
- If the student/apprentice agrees, take them with you to the DSL/DDSL

With the DDSL/DDSL, prepare a detailed, factual report itemising:

- the information revealed by the student/apprentice with absolutely no opinion
- actions taken by yourself, including when the suspicions were reported, to whom the suspicions were reported, and follow-up action taken within DNCG
- record this information as a written account of events and action taken on CPOMS and keep confidential
- you must keep, in absolute confidence, a copy of the report, as will the DSL/DDSL
- DNCG keeps Safeguarding, Child Protection and Prevent records on CPOMS securely and separately from any other information about the student’s/apprentice
- All staff are under a duty to report all suspicions of abuse on CPOMS
- The Safeguarding Team is responsible for reporting these concerns to e.g., Children’s Services/Adult Services/the police
- Accurate records are essential in the event of further investigations

If you see or hear something that concerns you:

- Don’t ignore it
- Report it on CPOMS immediately and at the latest by 5pm the same day and at the latest before the student/apprentice leaves DNCG that day
- The incident will be addressed the same day
- Don’t feel silly – if it worries you, someone else needs to know. Please still report your concern on CPOMS the same day. The Safeguarding Team will advise you of next steps.
- All staff may raise concerns directly with Children’s Services/Adult Social Care out of hours or if they feel an incident is not being dealt with appropriately and if they have already after having recorded a concern on CPOMS, or in the event that they are unable to locate relevant staff.
- Concerns about students should be made directly to the Safeguarding Team via CPOMS
- Concerns about staff should not be recorded on CPOMS and should be made directly to Rachel Maguire, Sally Senior, Neil Lancaster or the Principal.

Responding to reports of sexual violence and sexual harassment

It is important to note that students may not find it easy to tell staff about their abuse verbally. Students can show signs or act in ways that they hope adults will notice and react to. In some cases, the victim may not make a direct report. For example, a friend may make a report or a member of DNCG staff may overhear a conversation that suggests a student/apprentice has been harmed or a student's/apprentice's own behaviour might indicate that something is wrong.

It is essential that 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 DNCG should not be downplayed and should be treated equally seriously. A victim will never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor made to feel ashamed for making a report or their experience minimised.

When there has been a report of sexual violence, the DSL/DDSL will make an immediate risk and needs assessment. Where there has been a report of sexual harassment, the need for a risk assessment should be considered on a case-by-case basis.

The risk and needs assessment should consider:

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

Risk assessments will be recorded (written or electronic) and will be kept under review, actively considering the risks posed to all students and put adequate measures in place to protect them and keep them safe.

The DSL/DDSL will ensure they are engaging with children's social care and specialist services as required. Where there has been a report of sexual violence, it is likely that professional risk assessments by social workers and/or sexual violence specialists will be required. The DNCG risk assessment is not intended to replace the detailed assessments of expert professionals and will be used to inform DNCG's approach to supporting and protecting students and updating the DNCG risk assessment.

The DSL/DDSL response will include:

- the wishes of the victim in terms of how they want to proceed. This is especially important in the context of sexual violence and sexual harassment. Victims should be given as much control as is reasonably possible over decisions regarding how any investigation will be progressed and any support that they will be offered. This will however need to be balanced with DNCG's duty and responsibilities to protect other students
- the nature of the alleged incident(s), including whether a crime may have been committed and/or whether harmful sexual behaviour has been displayed
- the ages of the students involved
- the developmental stages of the students involved

- any power imbalance between the students. For example, is the alleged perpetrator(s) significantly older, more mature or more confident? Does the victim have a disability or learning difficulty?
- if the alleged incident is a one-off or a sustained pattern of abuse (sexual abuse can be accompanied by other forms of abuse and a sustained pattern may not just be of a sexual nature)
- that sexual violence and sexual harassment can take place within intimate personal relationships between peers
- are there ongoing risks to the victim, other students or DNCG staff, and
- other related issues and wider context, including any links to child sexual exploitation and child criminal exploitation.

The starting point regarding any report will always be that there is a zero-tolerance approach to sexual violence and sexual harassment, it is never acceptable, and it will not be tolerated.

There are four likely scenarios for DNCG to consider when managing any reports of sexual violence and/or sexual harassment. It will be important in all scenarios that decisions and actions are regularly reviewed and that relevant policies are updated to reflect lessons learnt, with potential patterns of concerning, problematic or inappropriate behaviour identified. Where a pattern is identified, DNCG decide on a course of action, considering whether there are wider cultural issues within DNCG that enabled the inappropriate behaviour to occur and where appropriate extra teaching time and/or staff training could be delivered to minimise the risk of it happening again. The four scenarios are:

- Manage internally
- Early Help
- Referrals to children's/adult social care
- Reporting to the Police

Allegations against Staff that may meet the harms threshold

We will manage cases of allegations that might indicate a person may pose a risk of harm if they continue to work in regular or close contact with students in their present position, or in any capacity. It will be used in respect of all cases in which it is alleged that a teacher or member of staff (including volunteers) has:

- Behaved in a way that has harmed, or may have harmed, a child, young person or vulnerable adult
- Possibly committed a criminal offence against or related to a child, young person or vulnerable adult
- Behaved towards a child or children in a way that indicates they are unsuitable to work with children, young people or vulnerable adults
- Behaved in way that indicates they may not be suitable to work with children, young people or vulnerable adults.

We will follow guidance in Keeping Children Safe in Education 2021 and local authority procedures with respect to "Managing Allegations Against People Who Work with Children". Where appropriate an assessment of transferable risk to students with whom the person works should be undertaken. If in doubt, the DSLs will seek advice from the local authority designated officer (LADO).

Where it is identified a child, young person or vulnerable adult has been harmed, that there may be an immediate risk of harm to a child, young person or vulnerable adult or if the situation is an emergency, we will contact children's/adult social care and as appropriate the police immediately.

We have a duty of care to our employees. We will ensure we provide effective support for anyone facing an allegation and provide the employee with a named contact if they are suspended. It is essential that any allegation of abuse made against a teacher or other member of staff or volunteer in DNCG is dealt with very quickly, in a fair and consistent way that provides effective protection for the student/apprentice and at the same time supports the person who is subject to the allegation.

We will:

- apply common sense and judgement
- deal with allegations quickly, fairly and consistently, and
- provide effective protection for the student/apprentice and support the person subject to the allegation.

Concerns that do not meet the harm threshold

DNCG will promote an open and transparent culture in which all concerns about all staff, paid and unpaid, working in or on behalf of DNCG are dealt with promptly and appropriately. A low-level concern does not mean that it is insignificant, it means that the behaviour towards a child does not meet the threshold but that an adult working in or on behalf of DNCG may have acted in a way that:

- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work, and
- does not meet the allegations threshold or does not warrant a referral to the LADO.

6 Relevant Policies and Procedures

- 6.1
- Equality, Diversity and Inclusion Policy
 - The Freedom of Speech Policy
 - The Policy for the Prevention of Bullying Victimisation and Harassment for Students and Apprentices
 - Keeping Children Safe in Education 2021
 - Whistleblowing Policy
 - Acceptable use of IT Policy
 - Complaints Policy
 - Disciplinary Policies and Procedures
 - Social Media Policy
 - ETF Professional Standards for Teachers and Trainers 2014
 - Human Resources, including Safer Recruitment and Managing Allegations against staff
 - Health and Safety Policy
 - Doncaster and North Lincolnshire Local Authority Safeguarding, Prevent and Child Protection Policies and Procedures
 - Personal Relationships at Work Policy
 - E Safety Policy
 - Social Media
 - Use of Reasonable Force
 - Screening, Searching and Confiscation of Prohibited Items
 - Home Office Prevent Duty
 - Inspecting Safeguarding in Early Years, Education & Skills (August 2021)
 - Working Together to Safeguard Children (DfE)

7 Who to Contact with Queries

7.1	Designated Safeguarding, Child Protection and Prevent Leads (DSL)	<p>Rachel Maguire Chief People Officer Rachel.maguire@northlindsey.ac.uk</p> <p>Sally Senior Director of Safeguarding and Inclusion sally.senior@don.ac.uk</p>
	North Lincolnshire's Children's Services Point of Contact (SPOC)	01724 296555 (out of hours)
	North Lincolnshire Adult Social Care	01724 29000 (out of hours)
	Doncaster Children's Service Trust	01302 796000 (out of hours)
	Doncaster Adult Social	01302 566999 (out of hours)
	Police (emergency)	999/112
	Police (non-emergency)	101

8 Communication

- 8.1 This Policy will be available externally via the DN Colleges Group website and referred to in key documentation. It will be promoted to staff via the intranet, internal communications, induction and ongoing CPD opportunities

Paper copies of the policy are available on request.

9 Authorisation

Policy Holder: Rachel Maguire, Chief People Officer

Approval Committee: Corporation Board

Approval Date: 7 February 2022

Next Review Date: January 2023

This Policy will be reviewed annually in line with Safeguarding, Child Protection and Prevent Guidance.