Safeguarding and Child Protection Policy and Procedures

This policy applies to :	All staff, All students
Author/Department:	Assistant Principal (Student Services)
Area/Person responsible:	Assistant Principal (Student Services)
Date approved:	May 2019
Date of Next Review:	September 2021

Date of most recent review:	September 2020
Changes made:	

The Equality Act 2010: The Equality Duty

The College has a duty to consider the needs of all individuals in our day-to-day work – in shaping policy, in delivering services and in relation to our employees. The Equality Duty has three aims, which require the College to have due regard to the need to:

Eliminate unlawful discrimination, harassment, victimisation and any other conduct prohibited by the Act;
Advance equality of opportunity between people who share a protected characteristic and people who do not share it; and
Foster good relations between people who share a protected characteristic and people who do not share it.

Does the policy support the aims of the Equality Duty?	Yes	x	No		N/A	
If no, please state which groups may be affected and complete a full equalities impact assessment (guidance and forms available on the intranet)						
Impact Assessment Reference:						

Initial Impact Assessment Completed		Date	
Review of Policy		Date	

Revision History

Version	Date	Changes
Original – 1.0	May 2019	
1.1	May 2020	1) Addition of Annex 1: COVID-19 College closure arrangements for Safeguarding and Child Protection at Ashton Sixth Form College
1.2	Sept 2020	1) Addition of new Safeguarding Manager, Shane Kelly 2) Change to the named safeguarding governor 3) Update reference to Keeping Children Safe in Education (2020)

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Section A: Safeguarding and Child Protection Policy

1 Key Contacts

Principal – Anton McGrath, anton.mcgrath@asfc.ac.uk

Designated Safeguarding Lead – Chris Cox (Assistant Principal, Student Services) chris.cox@asfc.ac.uk

Deputy Designated Safeguarding Lead – Shane Kelly (Safeguarding Manager) shane.kelly@asfc.ac.uk

Safeguarding Team – Anita Blank, anita.blank@asfc.ac.uk; Anna Harvey, anna.harvey@asfc.ac.uk; Jane Martin, jane.martin@asfc.ac.uk; Clare Shaw, clare.shaw@asfc.ac.uk; Genevieve Velarde, genevieve.velarde@asfc.ac.uk

Chair of the Stamford Park Trust Board – Stephen Foote, 0161 330 2330

Chair of the Ashton Sixth Form College Local Governing Body – Colin Challenger, 0161 330 2330

Nominated Governor for Safeguarding and Child Protection – Chris Lyness, 0161 330 2330

Local Authority Designated Officer – Tania Brown, 0161 342 4398, tania.brown@tameside.gov.uk

Tameside Children's Hub – 0161 342 4101, Out of Hours – 0161 342 2222
Hours - Monday to Wednesday 8.30am to 5.00pm; Thursday 8.30am to 4.30pm; Friday 8.30pm to 4.00pm

Tameside Safeguarding Adults Team – 0161 342 5243/5229, protectadult@tameside.gov.uk

Tameside Adult Social Care Team – 0161 342 2400, ACCT@tameside.gov.uk

2 Policy Statement

2.1 Introduction

Safeguarding children and young people is everyone's responsibility. Everyone who comes into contact with children and families has a role to play.

Our students' welfare is our paramount concern. The board of trustees and local governing body will ensure that our college, and multi-academy trust, will safeguard and promote the welfare of students and work together with other agencies to ensure that we have adequate arrangements to identify, assess and support those young people who are suffering or likely to suffer harm.

Here at Stamford Park Trust and Ashton Sixth Form College we are a community and all those directly connected, staff members, trustees, governors, parents, families and students, have an essential role to play in making it safe and secure.

2.2 Our Ethos

We believe that we should provide a caring, positive, safe and stimulating environment that promotes the social, physical and moral development of the individual student.

We recognise the importance of providing an environment within our setting that will help young people feel safe and respected. We recognise the importance of enabling young people to talk openly and to feel confident that they will be listened to.

We recognise that all adults within our trust, including permanent and temporary staff, volunteers, visitors, trustees and governors, have a full and active part to play in protecting our students from harm.

We will work with parents to build an understanding of our responsibilities to ensure the welfare of all young people, including the need for referrals to other agencies in some situations.

2.3   Scope

In line with the law, this policy defines a child as anyone under the age of 18 years. This policy applies to all members of staff in our setting, including all permanent, temporary and support staff, trustees, governors, volunteers, contractors and external service or activity providers.

While there are specific legal requirements relating to the welfare and protection of children, the trust is strongly committed to safeguarding the whole college community – children, young people, adult learners and staff against harm, abuse and bullying/harassment. We will therefore actively promote the well-being of all and ensure that this is central to our planning, decision-making and day-to-day practice. With regard to adult (19-plus) learners, we are aware that some of these may come within the category of 'vulnerable adults' and we will take every step to ensure these students are fully supported and carefully monitored in terms of their progress and well-being.

2.4   Definition

For the purpose of this policy, the trust will define safeguarding and child protection as:
- Protecting young people from maltreatment
- Preventing the impairment of young people's health or development
- Ensuring that young people grow up and develop in circumstances consistent with the provision of safe and effective care
- Taking action to enable all young people to have the best outcomes.

2.5   Our Commitments

In order to ensure that we fulfil our safeguarding and child protection responsibilities, we will:
- Promote the safety and best interests of students at all times.
- Ensure that all staff who work at the College, whether paid or unpaid (including those from other agencies such as Positive Steps and Tameside Sensory Support Services) and all trustees and governors have been subject to a DBS check.
- Ensure policies and procedures are clear, up to date and available to all college staff as part of the Staff Handbook.
- Fully train all new staff in safeguarding matters and ensure that this training is updated every two years.
- Ensure that all students undertaking work placements which put them into contact with children undergo a DBS check.
- Ensure that all work placements organised by college have been risk assessed for safety and suitability.
- Ensure that staff dealing with students on a pastoral level (e.g. Senior Tutors) receive more extensive training in Child Protection and have the opportunity to achieve an externally awarded qualification.
- Always have a nominated member of the Senior Leadership Team, designated members of staff (Safeguarding Team) and a governor on the local governing body taking responsibility for Safeguarding and Child Protection.
- Ensure that all trips and visits comply with safeguarding guidelines (see trips and visits policy).
- Liaise closely with the Local Authority, TSCP and other external agencies to develop best practice.

- Maintain thorough Child Protection records, documenting all reported cases, referrals and the response, records of staff, trustee and governor training, minutes of any relevant meetings and contact numbers.

2.6   Legal Framework

This policy will have consideration for, and be in compliance with, the following legislation and statutory guidance:

Legislation
- Children Act 1989
- Children Act 2004
- Education Act 2002
- Education (Health Standards) (England) Regulations 2003
- Safeguarding Vulnerable Groups Act 2006
- Equality Act 2010
- Protection of Freedoms Act 2012
- The Children and Families Act 2014
- The Sexual Offences Act 2003
- Children and Social Care Act 2017
- General Data Protection Regulations May 2018
- Data Protection Act 2018

Statutory Guidance
- DfE (2018) Working Together to Safeguard Children
- DfE (2020) Keeping Children Safe in Education
- DfE (2015) What to do if you're worried a child is being abused
- DfE (2018) Information Sharing for Safeguarding Practitioners
- DfE (2018) Disqualification under the Childcare Act 2006
- DfE (2015) The Prevent Duty: Departmental advice for schools and childcare providers

Local Guidance
- Tameside Safeguarding Children Partnership – Thresholds for Assessment and the Continuum of Need Guidance
- Tameside Safeguarding Children Partnership – Tameside Children's Needs Framework
- Greater Manchester Safeguarding Partnership guidance.

3   Roles and Responsibilities

3.1   Designated Safeguarding Lead

The lead person with overall responsibility for child protection and safeguarding is the Designated Safeguarding Lead, **Christopher Cox, Assistant Principal – Student Services**. The other members of the Safeguarding Team are:

- Shane Kelly, Safeguarding Manager (Deputy Designated Safeguarding Lead)
- Clare Shaw, College Counsellor
- Genevieve Velarde, College Counsellor
- Anna Harvey, Senior Tutor Manager
- Anita Blank, Senior Tutor Manager

- Jane Martin, Inclusive Learning Manager

In the absence of the named DSL, this role and associated responsibilities will be carried out by **Shane Kelly, Deputy Designated Safeguarding Lead.**

The DSL and other members of the safeguarding team are most likely to have a complete safeguarding picture and be the most appropriate people to advise on safeguarding concerns.

The role of the DSL and Deputy DSL includes:

Managing referrals – the DSL and/or Deputy DSL will:
- Refer all cases of suspected abuse to Tameside Children's Hub and to the police if a crime may have been committed, either personally or delegate to an appropriate member of staff;
- Liaise with the Principal about safeguarding issues relating to individual young people, especially ongoing enquiries under section 47 of the Children Act 1989;
- Act as a source of support, advise and expertise to staff members on matters of child protection and safeguarding;
- If early help is appropriate, generally lead on liaising with other agencies and set up an interagency assessment if necessary. They will monitor any cases referred to early help and consider referral to children's services where the situation does not improve;
- Refer cases to the Channel programme where there is a radicalisation concern.

Record Keeping – the DSL and/or Deputy DSL will:
- Ensure a stand-alone file is created as necessary for young people with safeguarding concerns;
- Maintain a chronology of significant incidents for each young person with safeguarding concerns;
- Ensure such records are kept confidentially and securely and separate from the young person's educational record;
- Ensure that, where a young person leaves our educational establishment and moves to a new provider, contact is made with the new provider and the child protection file is forwarded in an appropriately agreed manner. Evidence will be retained to demonstrate how the file has been transferred; this may be in the form of a written confirmation of receipt from the receiving establishment and/or evidence of recorded delivery. Consideration will be given as to whether it will be appropriate to share any information with the new establishment in advance of the young person leaving.

Interagency Working and Information Sharing – the DSL and/or Deputy DSL will:
- Cooperate with Children's Social Care for enquiries under section 47 of the Children Act 1989;
- Attend, or ensure other relevant staff members attend, child protection conferences, core group meetings and other multi-agency meetings, as required;
- Liaise with other agencies working with the child, share information as appropriate and contribute to assessments.

Child Protection and Safeguarding Training – the DSL and/or Deputy DSL will:
- Undertake appropriate training, updated every three years, and update knowledge and skills at least annually in order to:
  - Be able to recognise signs of abuse and how to respond to them, including special circumstances such as child sexual exploitation, female genital mutilation, fabricated or induced illness;
  - Be aware of responsibilities under the Prevent duty;

- Understand the assessment process for providing early help and intervention, e.g. the Tameside Safeguarding Children Continuum of Need guidance and tools and the early help planning processes;
- Have a working knowledge of how the local authority conducts initial and review child protection case conferences and contribute effectively to these; and
- Be alert to the specific needs of children in need (as specified in section 17 of the Children Act 1989), those with special educational needs, pregnant teenagers and young carers.
- Ensure each member of staff has access to and understands the trust's safeguarding and child protection policy and procedures, including providing induction on these matters to new staff members;
- Organise whole college child protection training for all staff members regularly, and provide updates at least annually. Ensure staff members who miss the training receive it by other means as appropriate;
- Ensure the College allocates time and resources every year for relevant staff members to attend training;
- Encourage a culture of listening to young people and taking account of their wishes and feelings in any action the College takes to protect them;
- Maintain accurate records of staff induction and training.

Awareness Raising – the DSL and/or Deputy DSL will:
- Review the safeguarding and child protection policy and procedures annually and liaise with the College's local governing body and the board of trustees to update and implement them;
- Make the safeguarding and child protection policy and procedures available publically and raise awareness of parents, carers and young people that referrals about suspected abuse may be made and the role of the College in any investigations that ensue;
- Provide updates to the College and board of trustees on any changes to child protection legislation and procedures and relevant learning from local and national serious case reviews, at least annually.

Quality Assurance – the DSL and/or Deputy DSL will:
- Monitor the implementation of and compliance with policy and procedures, including periodic audits of child protection and welfare concerns files (at a minimum of once a year);
- Complete an audit of the College's safeguarding arrangements at frequencies specified by the Tameside Safeguarding Children Partnership;
- Provide regular reports to the governing body detailing changes and reviews to policy, training undertaken by staff members and the number of young people with child protection plans and other relevant data;
- Take lead responsibility for remedying any deficiencies and weaknesses identified in child protection arrangements.

Looked After Children – the DSL and/or Deputy DSL will:
- Take responsibility for promoting the educational achievement of Looked After Children;
- Work with the local authority and other relevant agencies to discuss how available funding can be best used to support the progress of young people classed as Looked After and meet the needs identified in the young person's personal education plan;
- Promote the educational achievements of those who have left care, i.e. been adopted, special guardianship etc.

3.2   Nominated Governor for Safeguarding

The nominated governor responsible for safeguarding is **Christine Lyness**. They will liaise with the College's designated safeguarding lead and safeguarding manager.

3.3 Principal

The principal, Anton McGrath, will ensure that the policies and procedures adopted by the governing body are fully implemented and sufficient resources and time are allocated to enable staff members to discharge their safeguarding responsibilities.

3.4 Board of Trustees and Local Governing Body

The board of trustees and local governing body are collectively responsible for ensuring that safeguarding arrangements are fully embedded within the College's ethos and reflected in day-to-day practice. They are responsible for ensuring that the Designated Safeguarding Lead is an appropriate member of staff from the College leadership team.

3.5 All Staff

All staff members, trustees, governors, volunteers and external providers know how to recognise signs and symptoms of abuse, how to respond to young people who disclose abuse and what to do if they are concerned about a young person. Staff know that if they have any concerns about a young person's welfare they should act on them immediately. All staff are aware of the process for making referrals to children's social care and that statutory assessments under section 17 (children in need) and section 47 (a child suffering harm, or likely to suffer significant harm) may follow a referral along with the role they might be expected to play in such assessments.

4 Supporting Children and Young People

We recognise that young people who are abused or witness violence are likely to have low self-esteem and may find it difficult to develop a sense of self-worth. They may feel helpless, humiliated and some sense of blame. Our college may be the only stable, secure and predictable element in their lives.

We accept that the behaviour of a child or young person in these circumstances may range from that which is perceived to be normal to aggressive or withdrawn.

We will support all students by:
- Ensuring the content of the curriculum includes social and emotional aspects of learning;
- Ensuring a comprehensive curriculum response to e-safety, enabling young people and parents to learn about the risks of new technologies and social media and to use these responsibly;
- Covering relevant issues through relationships education and relationships and sex education or through PSHE (personal, social, health and economic education);
- Ensuring that child protection is included in the curriculum to help young people stay safe, recognise when they do not feel safe and identify who they might or can talk to;
- Providing students with a number of appropriate adults to approach if they are in difficulties;
- Supporting the young person's development in ways that will foster security, confidence and independence;
- Encouraging development of self-esteem and self-assertiveness while not condoning aggression or bullying;
- Ensuring repeated hate incidents, e.g. racist, homophobic or gender- or disability-based bullying, are considered under child protection procedures;
- Liaising and working together with other support services and those agencies involved in safeguarding children;
- Monitoring young people who have been identified as having welfare or protection concerns and providing appropriate support;

- Ensuring that staff are aware of the early help process, and understand their role in it, including acting as the lead professional where appropriate;
- Ensuring that all staff understand the additional safeguarding issues of young people with special educational needs and disabilities and how to address them;
- Monitoring attendance patterns and reviewing and responding to them as part of welfare and protection procedures; and
- Taking young people's wishes and feelings into account when determining what action to take and what services to provide.

5 Supporting HE and Adult Learners

The College uses the term "HE and Adult Learner" to refer to students who are enrolled on one of the College's HE and Adult courses, and who is over the age of 18. Students who are over 18 but who are enrolled on a 16-19 course will fall under the policy and procedures applied to full time 16-19 students, as will part time learners aged 16-19 who are enrolled on part time adult learning courses.

More information regarding the support available to HE and Adult learners is available in section B of the full college Safeguarding and Child Protection Policy and Procedures.

5.1 Safeguarding Vulnerable Adults

A vulnerable adult is defined by Tameside Safeguarding Adults Partnership as someone who is over 18 years of age and in receipt or need of community care services in order to maintain their independence.

Adult students are able to disclose information about their circumstances at enrolment, induction and during their programme of study.

All staff working with HE and Adult learners receive safeguarding training as part of the College's training programme. Some team members also attend training on vulnerable adults where necessary.

Any member of staff who becomes aware of a situation should act. Staff can report their concerns to the DSL in college and/or contact Tameside Adult Safeguarding Team or, if applicable, Tameside Adult Social Care Team to report concerns or for more information. This can be done in complete confidence.

The wishes of the adult who is thought to be, or who reports that they are, at risk will be fully respected.

The DSL will liaise with all parties concerned to ensure the matter is responded to within the framework of Tameside Safeguarding Adults guidance and policies.

5.2 Safeguarding Non-Vulnerable Adults

If a member of staff suspects that an adult student who is not deemed to be 'vulnerable' under the definition provided is the subject of abuse, the full range of appropriate college support services should be offered. Where there is a suspicion that the abuse may involve criminal activity, this should be recorded, and with consent (or without, if danger level is deemed to be high – as long as the person is informed), this can be referred to the DSL and external referrals can be made.

It should be remembered that adults who are possibly experiencing abuse may live with younger siblings or have children of their own. The risk to these children should be considered. Actions taken by a member of staff should be appropriate and proportionate.

6 Record Keeping

All child protection and welfare concerns, discussions and decisions made will be recorded in writing and kept in a confidential file and stored securely.

If a young person about whom there have been concerns transfers to another educational establishment, all appropriate information, including child protection and welfare concerns, will be forwarded under confidential cover to the young person's new educational establishment as a matter of priority.

7 Safer Workforce and Managing Concerns About or Allegations Against Staff and Volunteers

All staff will be subjected to safeguarding checks in line with the statutory guidance *Keeping Children Safe in Education: Statutory Guidance for Educational Establishments and Colleges, September 2020.*

We will ensure that agencies and third parties supplying staff provide us evidence that they have made the appropriate level of safeguarding checks on individuals working in our college. We will also ensure that any agency worker presenting for work is the same person on whom the checks have been made.

Every job description and person specification will have a clear statement about the safeguarding responsibilities of the post holder.

We will ensure that at least one member of every interview panel who conducts an interview has completed safer recruitment training.

We have a procedure in place to handle allegations against members of staff and volunteers in line with *Keeping Children Safe in Education: Statutory Guidance for Educational Establishments and Colleges, September 2020*. In accordance with local guidance, we adhere to Greater Manchester safeguarding procedures – *Managing Allegations Against Staff* guidance and *Safer Recruitment.*

Any allegation made against a staff member or concern raised about a member of staff, volunteer or visitor will be dealt with by the principal. In the case of allegations made against the principal, the case manager will be the chair of the Stamford Park Trust. The procedure for managing allegations is detailed in section B of our document *Safeguarding and Child Protection Policy and Procedures.*

8 Staff Induction, Training and Development

All new members of staff, including newly-qualified teachers and support staff, will be given induction that includes basic child protection training on how to recognise signs of abuse, how to respond to any concerns, e-safety and familiarisation with the safeguarding and child protection policy, staff code of conduct, Keeping Children Safe in Education: Statutory Guidelines for Educational Establishments and Colleges, Part One, and Annex A Further Information September 2020, and other related policies. We will ensure that staff understand the difference between a safeguarding concern and a child in immediate danger or at risk of significant harm.

The DSL will undergo updated child protection training every three years. In addition to this, their knowledge and skills should be updated regularly, and at least annually, to keep up with developments relevant to the role.

All staff members of the College will receive appropriate safeguarding and child protection training (whole-college training) which is regularly updated. The DSL will provide briefings to the College on any changes to child protection legislation and procedures and relevant learning from local and national serious case reviews as required, but at least annually.

The Board of Trustees will also receive relevant training, updated every two years.

The College will maintain accurate records of staff induction and training.

9 Confidentiality, Consent and Information Sharing

We recognise that all matters relating to child protection are confidential.

The principal, DSL or other nominated members of the safeguarding team will disclose any information about a student to other members of staff on a need-to-know basis, and in the best interests of the young person.

All staff members must be aware that they cannot promise a young person to keep secrets which might compromise the young person's safety or wellbeing.

All staff members who come into contact with children and young people will be given appropriate training to understand the purpose of information sharing in order to safeguard and promote young people's welfare.

We will ensure that staff members are confident about what they can and should do under the law, including how to obtain consent to share information and when information can be shared without consent. This is covered in greater detail in section B of our document, *Safeguarding and Child Protection Policy and Procedures.*

10 Inter-Agency Working

We will develop and promote effective working relationships with other agencies, including agencies providing early help services to children, the police and Children's social care.

We will ensure that relevant staff members participate in multi-agency meetings and forums, including child protection conferences and core groups, to consider individual children/young people.

We will participate in serious case reviews, other reviews and file audits as and when required to do so by the Tameside Safeguarding Children Partnership.

11 Contractors, Service and Activity Providers and Work Placement Providers

We will ensure that contractors and providers are aware of our college's safeguarding and child protection policy and procedures. We will require that employees and volunteers provided by these organisations use our procedure to report concerns.

We will seek assurance that employees and volunteers provided by these organisations and working with our students have been subjected to the appropriate level of safeguarding check in line with *Keeping Children Safe in Education: Statutory Guidance for Educational Establishments and Colleges, September 2020.* If assurance is not obtained, permission to work with our students or use our college premises may be refused.

When we commission services from other organisations, we will ensure that compliance with our policy and procedures is a contractual requirement.

12 Whistleblowing and Complaints

We recognise that young people cannot be expected to raise concerns in an environment where staff members fail to do so.

We will ensure that all staff members are aware of their duty to raise concerns, where they exist, about the management of child protection, which may include the attitude or actions of colleagues. If necessary, they will speak with the principal, the chair of the governing body or with the Local Authority Designated Officer. Should staff not feel able to raise concerns, they can call the NSPCC whistleblowing helpline on 0800 028 0285.

We have a clear reporting procedure for young people, parents and other people to report concerns or complaints, including abusive or poor practice.

We will actively seek the views of young people, parents, carers and staff members on our child protection arrangements through surveys, questionnaires and other means.

13 Site Security

All staff members have a responsibility to ensure our buildings and grounds are secure and for reporting concerns that may come to light.

We check the identity of all visitors and volunteers coming into the College. Visitors are expected to be signed in and out through the Reception and to display the appropriate visitor's badge while on college premises.   Any individual who is not known or identifiable will be challenged for clarification and reassurance.

The College will not accept the behaviour of any individual, parent or anyone else, that threatens college security or leads others, child or adult, to feel unsafe. Such behaviour will be treated as a serious concern and may result in the decision to refuse the person access to the College site.

14 Quality Assurance

We will ensure that systems are in place to monitor the implementation of and compliance with this policy and accompanying procedures. This will include periodic audits of safeguarding files and records by the DSL.

We will complete an audit of the College's safeguarding arrangements at frequencies specified by the Tameside Safeguarding Children Partnership.

The College's senior management and local governing body will ensure that action is taken to remedy without delay any deficiencies and weaknesses identified in child protection arrangements.

15 Policy Review

This policy and the procedures will be reviewed every academic year. All other linked policies will be reviewed in line with the policy review cycle.

The DSL will ensure that staff members are made aware of any amendments to policies and procedures.

16 Linked Policies and Procedures

The following policies and procedures are relevant for the child protection and safeguarding policy and procedure.

- Code of Conduct (Staff)
- Compliments and Complaints Policy
- Data Protection Policy
- Educational Trips and Visits Policy and Guidance
- Equality Scheme and Objectives
- Fitness to Study Policy
- Health and Safety Policy and Procedures
- Inclusive Learning Policy
- PREVENT Strategy
- Recruitment and Selection Policy and Procedures
- Risk Management Policy
- Security Policy
- Staff Acceptable Use Policy (ICT)
- Student Acceptable Use Policy (ICT)
- Student Handbook, including:
  - Support Services
  - Attendance & Punctuality
  - Progression
  - Student Engagement
  - Parental Engagement
  - Student Conduct Policy and Procedures
- Teachers' Standards, Department of Education guidance available on gov.uk website
- Whistleblowing Policy

Section B: Child Protection and Safeguarding Procedures

1   Definitions

Abuse, including neglect, is a form of maltreatment. A person may abuse or neglect a child or young person by inflicting harm or failing to prevent harm. Children may be abused within their family, in an institution or community setting, by those known to them, or more, rarely, by others (e.g. via the internet). They may be abused by an adult or adults or another child or children.

Children are any people who have not yet reached their 18th birthday; a 16-year-old, whether living independently, in further education, in the armed forces or in hospital, is a child and is entitled to the same protection and services as anyone younger. Please note, the child protection guidelines within this policy should be followed for all students aged 19 or under.

Child Protection is part of safeguarding and promoting the welfare of children and refers to activity undertaken to protect specific children who are suffering, or like to suffer, significant harm.

Early Help means providing support as soon as a problem emerges, at any point in a child's life, from the foundation years to teenage years.

Safeguarding children is the action we take to promote the welfare of children and protect them from harm.

Safeguarding and promoting the welfare of children is defined in *Working Together to Safeguard Children: A Guide to Inter-Agency Working to Safeguard and Promote the Welfare of Children (July 2018)* as:
- Protecting children from maltreatment;
- Preventing impairment of children's health and development;
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and
- Taking action to enable all children to have the best outcomes.

Significant harm is the threshold that justifies compulsory intervention in the family in the best interests of the child. Section 31 of the Children Act 1989 states 'where the question of whether harm suffered by a child is significant turns on the child's health or development, his health or development shall be compared with that which could reasonably be expected of a similar child.'

2   Categories of Abuse

Emotional abuse is the persistent emotional maltreatment of a child such that it causes severe and persistent adverse effects on the child's emotional development. It may involve:
- Making the child feel worthless, unloved or inadequate;
- Only there to meet another's needs;
- Inappropriate age or developmental expectations;
- Overprotection and limitation of exploration, learning and social interaction;
- Seeing or hearing the ill treatment of another, e.g. domestic abuse;
- Making the child feel worthless or unloved – high criticism and low warmth;
- Serious bullying (including cyberbullying);
- Exploitation or corruption.

Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Neglect is the persistent failure to meet a child's basic physical or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance misuse. Once a child is born, it may involve a parent failing to:
- Provide adequate food, clothing and shelter, including exclusion from home or abandonment;
- Protect a child from physical and emotional harm or danger;
- Ensure adequate supervision, including the use of inadequate care givers;
- Ensure access to appropriate medical care or treatment.

It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

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

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, including prostitution, whether or not the child is aware of what is happening. Activities may involve physical contact, including penetration of any part of the body, or non-penetrative acts. They may include non-contact activities, such as involving children looking at or in the production of sexual images, including on the internet, watching sexual activities, or encouraging children to behave in sexually inappropriate ways.

Child sexual exploitation is also sexual abuse; it involves children and young people receiving something, for example accommodation, drugs, gifts or affection, as a result of them performing sexual activities or having others perform sexual activities on them. It could take the form of grooming of children, e.g. to take part in sexual activities or to post sexual images of themselves on the internet.

Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

3 Specific Safeguarding Issues

Staff should be aware of specific safeguarding issues such as:

- Child missing from education;
- Children and the court system;
- Child missing from home or care;
- Children with family members in prison;
- Child sexual exploitation (CSE);
- County lines;
- Bullying incidents including cyberbullying;
- Domestic abuse;
- Drugs;
- E-safety;
- Fabricated or induced illness;
- Female genital mutilation (FGM);
- Forced marriage;
- Gangs and youth violence;

- Gender-based violence/violence against women and girls (VAWG)
- Homelessness;
- 'Honour-based' violence;
- Mental health;
- Peer on peer abuse;
- Private fostering;
- Preventing radicalisation and the PREVENT duty;
- Self-harm and suicidal behaviour;
- Sexting;
- Sexual violence/harassment;
- Teenage relationship abuse;
- Trafficking.

3.1 Further information on children missing from education

A child going missing from education is a potential sign of abuse or neglect, particularly on repeat occasions.

Educational establishments and colleges should put in place appropriate safeguarding responses to children and young people who go missing from education, particularly on repeat occasions, to help identify the risk of abuse and neglect, including sexual abuse or exploitation, and to help prevent the risks of their going missing again.

All educational establishments must inform the local authority of any child or young person who fails to attend regularly, or has been absent without permission for a continuous period of 10 term days or more, at such intervals as are agreed between the establishment and the local authority (or in default of such agreement, at intervals determined by the Secretary of State).

We may request more than one emergency contact number for each student in order to be able to contact more than one responsible adult if a child who is missing education is also identified as a welfare and/or safeguarding concern.

Refer to *Keeping Children Safe in Edcuation, September 2020, Annex A* for further guidance.

3.2 Further information on Child Sexual Exploitation

Child sexual exploitation (CSE) involves exploitative situations, contexts and relationships where young people receive something (for example food, accommodation, drugs, alcohol, gifts, money or in some cases simply affection) as a result of engaging in sexual activities. Sexual exploitation can take many forms ranging from the seemingly 'consensual' relationship where sex is exchanged for affection or gifts, to serious organised crime by gangs and groups. What marks out exploitation is an imbalance of power in the relationship. The perpetrator always holds some kind of power over the victim which increases as the exploitative relationship develops. Sexual exploitation involves varying degrees of coercion, intimidation or enticement, including unwanted pressure from peers to have sex, sexual bullying including cyberbullying and grooming. However, it is also important to recognise that some young people who are being sexually exploited do not exhibit any external signs of this abuse.

Teachers and college staff are more likely to see victims on a regular basis than almost any other professional. They will notice recurrent or prolonged absences and significant changes in behaviour. The use of a chronology will enable these patterns to be identified. They are key to identifying young people at risk and raise concerns at an early stage, to potentially halt the grooming process before sexual exploitation has

begun. Teachers will highlight concerns about missing children as they may be at risk of child sexual exploitation.

Some of the following signs may be indicators of sexual exploitation:

- Young people who appear with unexplained gifts or new possessions;
- Young people who associate with other young people involved in exploitation;
- Young people who have older boyfriends or girlfriends;
- Young people who suffer from sexually transmitted diseases or become pregnant;
- Young people who suffer from changes in emotional wellbeing;
- Young people who misuse drugs and alcohol;
- Young people who go missing for periods of time or regularly come home late;
- Young people who regularly miss college.

Due to the nature of the grooming methods used by their abusers, it is very common for children and young people who are sexually exploited not to recognise that they are being abused. Practitioners should be aware that young people particularly aged 17 and 18 may believe themselves to be acting voluntarily and will need practitioners to work with them so that they can recognise that they are being sexually exploited.

As much as possible it is important that the young person is involved in decisions that are made about them.

3.3 Child Criminal Exploitation – County Lines

Criminal exploitation of children is a geographically widespread form of harm that is a typical feature of county lines criminal activity; drug networks or gangs groom and exploit children and young people to carry drugs and money from urban areas to suburban and rural areas, market and seaside towns. Key to identifying potential involvement in county lines are missing episodes, where the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism should be considered. Like other forms of abuse and exploitation, county lines exploitation:

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

3.4 Further information on Domestic Abuse

The definition of 'domestic violence and abuse' was updated by the Home Office in March 2013 to include the reality that many young people are experiencing domestic abuse and violence in relationships at a young age. They may therefore be children in need or likely to suffer significant harm. The latest definition from the Home Office is as follows:

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

- Psychological
- Physical
- Sexual
- Emotional

Staff should be aware that any disclosures made by young people may have a background in domestic abuse and that this abuse may be part of an overall pattern of abuse or violence towards women and girls in the family. That said, domestic abuse can also be experienced by males and assumptions should not be made based on the gender of perpetrators of domestic abuse.

For further information consult "Domestic Violence and Abuse" https://www.gov.uk/domestic-violence-and-abuse.

3.5 Further information on On-line Safety (use of ICT, the internet, mobile technology and social media)

The College has an Acceptable Use Policy (ICT) for both staff and students which includes guidance in relation to online safety and using the internet and social media. There are appropriate filtering and monitoring systems in place. Staff are encouraged to report their concerns if they believe that students are using the internet, mobile technology or social media inappropriately (e.g. sexting). In these instances, the DSL should contact the Single Point of Advice for advice on how to proceed with regards to talking to parents or carers about online safety. In some extreme cases, the police may become involved if a child is at risk of exploitation due to their use of the internet or social media. Consequently, staff must report concerns in a timely way so that advice and support can be sought.

For further information see *Keeping Children Safe in Education, Annex C.*

3.6 Further information on Female Genital Mutilation (FGM)

Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a girl being at risk of FGM, or already having suffered FGM. There are a range of potential indicators that a child or young person may be at risk of FGM, which individually may not indicate a risk but if there are two or more indicators present this could signal a risk to the child or young person. Victims of FGM are likely to come from a community that is known to practice FGM. Professionals should note that girls at risk of FGM may not yet be aware of the practice or that it may be conducted on them, so sensitivity should always be shown when approaching the subject. Staff should activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and children's social care.

Warning signs that FGM may be about to take place, or may have already taken place can be found on pages 38-41 of the Multi-Agency Practice Guidelines referred to below. E-learning for all professionals, developed by the Home Office, is available at www.fgmelearning.co.uk.

Girls who are threatened with, or who have undergone FGM may withdraw from education, restricting their educational and personal development. They may feel unable to go against the wishes of their parents and consequently may suffer emotionally. Staff may become aware of a student because she appears anxious, depressed and emotionally withdrawn. They may be presented with a sudden decline in her performance,

aspirations or motivation. There may be occasions when a student comes to college but then absents herself from lessons, possibly spending prolonged periods in the bathroom.

Students who fear they may be at risk of FGM can often come to the attention of, or turn to, a teacher, lecturer or other member of staff before seeking help from the police or social services. Sometimes the student's friends may report it to staff. Teachers, lecturers and other members of staff are in an ideal position to identify and respond to a victim's needs at an early stage. A flowchart/risk assessment tool is available at https://www.gov.uk/government/publications/safeguarding-women-and-girls-at-risk-of-fgm.

Staff should be aware of mandatory reporting requirements with regards to known cases of FGM which require teachers to personally report to the police cases where they discover than an act of FGM appears to have been carried out. Further details can be found in *Keeping Children Safe in Education, September 2020, Annex A.*

3.7 Further information on Forced Marriage

A forced marriage is one in which at least one participant does not (or cannot) consent to the marriage and pressure or abuse is used. It is recognised in the UK as a serious abuse of human rights.
The pressure put on people to marry against their will can be physical (including threats of violence, actual physical violence and sexual violence) or emotional and psychological (e.g. shame and coercion) Financial abuse can also be a factor.

It is important to consider the effect on young people who, whilst not at risk themselves, may disclose that older siblings or parents are at risk.

Further information on the role of educational establishments can be found on pages 32-36 of Multi-agency guidelines: Handling cases of forced marriage.   College staff can contact the Forced Marriage Unit on 020 7008 0151 or email fmu@fco.gov.uk for advice or information.

3.8 Further information on Preventing Radicalisation

The Counter-Terrorism and Security Act, which received Royal Assent on 12 February 2015, places a duty on specified authorities, including local authorities and childcare, education and other children's services providers, in the exercise of their functions, to have due regard to the need to prevent people from being drawn into terrorism ("the Prevent duty"). This came into force on 1 July 2015. The Prevent duty directs inspectors to examine the College's response to extremist behaviour when considering the behaviour and safety of pupils, as well as the effectiveness of the leadership and management of the College in preventing extremism.

The Counter-Terrorism and Security Act 2015 also places a duty on local authorities to ensure Channel panels are in place. The panel must include the local authority and chief officer of the local police. Panels will assess the extent to which identified individuals are vulnerable to being drawn into terrorism, following a referral from the police and where considered appropriate and necessary consent is obtained, arrange for support to be provided to those individuals. The Act will require partners of Channel panels to co-operate with the panel in the carrying out of its functions and with the police in undertaking the initial assessment as to whether a referral is appropriate.

Educational establishments and colleges which are required to have regard to Keeping Children Safe in Education are listed in the Act as partners of the panel. The relevant provisions of the Act came into force on 12 April 2015 but many local authorities already have Channel panels set up in their area. More information

about how to make a Channel referral is available on the Tameside website at
https://www.tameside.gov.uk/extremism.

3.9 Channel Training

'Channel' is the name for the process of referring a person for early intervention and support, including:
- identifying people at risk of being drawn into terrorism
- assessing the nature and extent of that risk, and
- developing the most appropriate support plan for the people concerned.

The Channel process is about safeguarding children, young people and adults from being drawn into committing terrorist-related activity. It is about early intervention to protect and divert people away from risk before a crime occurs.

You can complete a short general awareness course online here:
http://course.ncalt.com/Channel_General_Awareness/01/index.html

The Department for education has published The Prevent duty departmental advice for educational establishments and childcare providers at:
https://www.gov.uk/government/publications/protecting-children-from-radicalisation-the-prevent-duty.

3.10 Further information on Self-harm and Suicidal Behaviour

Self-harm, self-mutilation, eating disorders, suicide threats and gestures by a child or young person must always be taken seriously and may be indicative of a serious mental or emotional disturbance.

If you believe that a child or young person is at risk from self-harm and/or suicidal behaviour, refer to the DSL or other member of the safeguarding team as soon as possible.

3.11 Further information on Sexting

Sexting among children and young people can be a common occurrence, where they often describe these incidents as 'mundane'. Children involved in sexting incidents will be dealt with by the police as victims as opposed to perpetrators, unless there are mitigating circumstances. The DSL should record all incidents of sexting. This should include both the actions taken and the actions not taken, together with justifications.

In applying judgement to the sexting incident consider the following:

- Significant age difference between the sender/receiver involved
- If there is any external coercion involved or encouragement beyond the sender/receiver.
- If you recognise the child as more vulnerable than is usual.
- If the image is of a severe or extreme nature.
- If the situation is not isolated and the image has been more widely distributed.
- If this is not the first time children have been involved in a sexting act
- If other knowledge of either the sender or recipient may add cause for concern.

If these characteristics present cause for concern then escalate or refer the incident. If not, manage the situation accordingly, recording details of the incident, action and resolution.

3.12   Further information on Private Fostering

Parents and carers often fail to notify education providers about private fostering arrangements even though they are legally required to notify Children's Services. Often this is because they are unaware of the requirements. They believe that this is a private family arrangement which does not concern anybody else.

This lack of awareness means that many privately fostered children remain hidden and can be vulnerable, as in the case of Victoria Climbie who was a privately fostered child.

Private Fostering definition

Private fostering occurs when a child/young person under 16 (or 18 if the child is disabled) is cared for and lives with an adult who is not a parent, a person with parental responsibility or relative as defined by the Children Act 1989, for 28 days or more.

Private fostering is a private arrangement made by the parent(s), (or those with parental responsibility) for someone to care for their child because they are unable to do so (permanently or temporarily). This may be due to a number reasons such as parental ill health, a parent going abroad or in to prison, a child or young person being bought to the UK to study or the relationship between the child/young person and parent has broken down.

College staff play an essential role in identifying privately fostered children and young people. If you know a child/young person is being privately fostered you should advise the parent/carer that they have a legal obligation to report the arrangement to Children's Social Care.

Alert your Designated Safeguarding Lead who will ensure this is followed up with Children's Social Care and the arrangement is assessed, approved and monitored

4   Recognition – What To Look For

Staff members should refer to the detailed information about the categories of abuse and risk indicators in the Tameside Children's Needs Framework and Thresholds guidance for further guidance.

In an abusive relationship, the child or young person may:
- appear frightened of their parent(s)
- act in a way that is inappropriate to their age and development, although full account needs to be taken of different patterns of development and different ethnic groups

In an abusive relationship, the parent or carer may:
- persistently avoid child health services and treatment of the child's illnesses
- have unrealistic expectations of the child or young person
- frequently complain about or to the child/young person and fail to provide attention or praise
- be absent
- be misusing substances
- persistently refuse to allow access on home visits by professionals
- be involved in domestic violence and abuse
- be socially isolated

Staff should be aware that children and young people with special educational needs and disabilities can face additional safeguarding challenges including:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to their disability
- children and young people with special educational needs and disabilities are particularly vulnerable to bullying and often show no outward signs
- communication issues can be a barrier to effective safeguarding.

5 Allegations of Abuse Made Against Other Children/young people - Peer on Peer Abuse

At the College we believe that all young people have a right to attend college and learn in a safe environment. Young people should be free from harm by adults in the College and other students.

We recognise that some students will sometimes negatively affect the learning and wellbeing of others and their behaviour will be dealt with under the College's Student Conduct Policy. Children/young people can abuse other children/young people. This is generally referred to as peer on peer abuse and can take many forms. This can include (but is not limited to) bullying (including cyberbullying); sexual violence and sexual harassment; physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm; sexting and initiating/hazing type violence and rituals.

5.1 Safeguarding allegations

It is important to remember that peer-on-peer abuse does not occur in a vacuum. It occurs in a society where there are structures and norms that shape young people's views, experiences and behaviours, as well as responses to them. Consequently there are different issues of gender that will need to be considered when responding to allegations made against students by others in college, which are of a safeguarding nature. Safeguarding issues raised in this way may include physical abuse, emotional abuse, sexual abuse and sexual exploitation. It is likely that to be considered a safeguarding allegation against a student, some of the following features will be found.

The allegation:
- is made against an older student and refers to their behaviour towards a younger student or a more vulnerable student
- is of a serious nature, possibly including a criminal offence
- raises risk factors for other students in the College
- indicates that other students may have been affected by this student
- indicates that young people outside the educational establishment may be affected by this student.

Examples of safeguarding issues against a student could include:

Physical Abuse
- violence, particularly pre-planned
- forcing others to use drugs or alcohol

Emotional Abuse
- blackmail or extortion
- threats and intimidation

Sexual Abuse
- indecent exposure, indecent touching or serious sexual assaults
- forcing others to watch pornography or take part in sexting

Sexual Exploitation
- encouraging other children/young people to attend inappropriate parties
- photographing or videoing other children/young people performing indecent acts

In areas where gangs are prevalent, older students may attempt to recruit younger students using any or all of the above methods. Young people suffering from sexual exploitation themselves may be forced to recruit other young people under threat of violence.

5.2 Minimising the risk of safeguarding concerns towards students from other students

We will:

- provide a developmentally appropriate PSHE syllabus which develops students' understanding of acceptable behaviour and keeping themselves safe.
- Have systems in place for any student to raise concerns with staff, knowing they will be listened to, believed and valued.
- Deliver targeted work on assertiveness and keeping safe to those students identified as being at risk.

On occasion, some students will present a safeguarding risk to other students. The College should be informed that the young person raises safeguarding concerns, for example, they are coming back into college following a period in custody or they have experienced serious abuse themselves.

These students will need an individual risk management plan to ensure that other students are kept safe and they themselves are not laid open to malicious allegations. There is a need to balance the tension between privacy and safeguarding.

5.3 What to do

When an allegation is made by a student against another student, members of staff should consider whether the complaint raises a safeguarding concern. If there is a safeguarding concern the DSL should be informed.

A factual record should be made of the allegation, but no attempt at this stage should be made to investigate the circumstances.

The DSL should contact the Children's Hub or CAF Advisor to discuss the case. It is possible that Children's Social Care are already aware of safeguarding concerns around this young person. The DSL will follow through the outcomes of the discussion and make a statement of referral where appropriate.

The DSL will make a record of the concern, the discussion and any outcome and keep a copy in the files of both students' files.

If the allegation indicates a potential criminal offence has taken place, the police should be contacted at the earliest opportunity and parents informed (of both the student being complained about and the alleged victim).

Where neither Children's Social Care nor the police accept the complaint, a thorough college investigation should take place into the matter using the College's usual disciplinary procedures.

In situations where the College considers a safeguarding risk is present, a risk assessment should be prepared along with a preventative, supervision plan.

The plan should be monitored and a date set for a follow-up evaluation with everyone concerned.

6 Sexual Violence and Sexual Harassment between Children and Young People in Schools and Colleges

Sexual violence and sexual harassment can occur between two children of any age and sex. It can also occur through a group of children/young people sexually assaulting or sexually harassing a single child/young person or group of children/young people.

Children and young people who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and offline (both physical and verbal) and are never acceptable. It is important that all victims are taken seriously and offered appropriate support. Staff should be aware that some groups are potentially more at risk. Evidence shows girls, children and young people with SEND and LGBT children/young people are at greater risk.

Staff will be aware of the importance of:
- making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up;
- not tolerating or dismissing sexual violence or sexual harassment as "banter", "part of growing up", "just having a laugh" or "boys being boys"; and
- challenging behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them.

7 Early Help for Children and Families

Most parents can look after their children without the need of help other than from their family or friends. However, some parents may need additional help from our college or other services such as the NHS. Providing help early is more effective in promoting the welfare of children than reacting later.

Our college will work together with other agencies to provide a coordinated offer of early help, in line with Working Together to Safeguard Children 2018 and local guidance, to any child or young person who needs it.

We will pool our knowledge within the College and with other agencies about which families or young people need additional support in a range of ways so that we can work out how best to help them.

We will work closely with targeted early help services and Children's Social Care if we feel families need more support and input, or children/young people are at risk of harm, and we will continue to provide support if other services are also needed.

8 Information Sharing and Consent

It is essential that people working with children and young people can confidently share information as part of their day-to-day work. This is necessary not only to safeguard and protect children and young people from harm but also to work together to support families to improve outcomes for all.

The College may have to share information about parents or carers, such as their medical history, disability or substance misuse issues, for investigations of child abuse carried out by Children's Social Care.

We will proactively seek out information as well as sharing it. This means checking with other professionals whether they have information that helps us to be as well informed as possible when working to support children and young people.

The Data Protection Act 2018 and GDPR are not barriers to sharing information. They are there to ensure that personal information is managed in a sensible way and that a balance is struck between a person's privacy and public protection.

We should be sharing any concerns we have with parents at an early stage, unless this would put a child or young person at greater risk or compromise an investigation. Parents need to know what our responsibilities are for safeguarding and protecting children and young people and that this involves sharing information about them with other professionals.

Be clear about the purpose of sharing confidential information and only share as much as you need to achieve your purpose.

Try to get consent from parents (or the child/young person, if they have sufficient understanding) to share information, if possible. However, you do not need consent if you have serious concerns about a child or young person's safety and well-being. If you decide to share information without consent, you should record this with a full explanation of your decision.

Consent should not be sought from parents or carers (or the child/young person, if they have sufficient understanding), if:
- it would place a child/young person at increased risk of harm; or
- it would place an adult at risk of serious harm; or
- it would prejudice a criminal investigation; or
- it would lead to unjustified delay in making enquiries about allegations of significant harm to a child; or
- required by law or a court order to share information.

Consent is not necessary in cases where Children's Social Care are making child protection enquiries under section 47 of the Children Act 1989. Information needs to be shared with Children's Social Care; staff members must make sure to record what information has been shared.

Consent is necessary, for:
- Children's Social Care investigations or assessments of concerns under section 17 of the Children Act 1989. Children's Social Care will assume that we have obtained consent from the parents to share information unless we make them aware that there is a specific issue about consent. This must be discussed with a social worker in the Single Point of Advice.
- early help assessments. Assessments are undertaken with the agreement of the child and their parents or carers.

If you are in any doubt about the need for seeking consent, get advice from the DSL or from the Children's Social Care Single Point of Advice.

Keep a record of your decision to share information, with or without consent, and the reasons for it. Remember also that it is just as important to keep a record of why you decided not to share information as why you did so.

9 Record Keeping

Good record keeping is an important part of the College's accountability to children and their families and will help us in meeting our key responsibility to respond appropriately to welfare concerns about children and young people.

Records should be factual, accurate, relevant, up to date and auditable. They should support monitoring, risk assessment and planning for children and young people and enable informed and timely decisions about appropriate action to take.

The DSL will ensure that records are maintained appropriately for children and young people with safeguarding concerns and that stand-alone files are created and maintained in line with requirements of the above guidance.

10 Safer Recruitment

Our college has robust recruitment and vetting procedures to help prevent unsuitable people from working with children and young people.

Our job advertisements and application packs make explicit reference to the College's commitment to safeguarding children and young people, including compliance with the Disclosure and Barring Service (DBS) process and clear statements in the job description and person specification about the staff member's safeguarding responsibilities.

All staff members who have contact with children, young people and families will have appropriate pre-employment checks in line with Keeping Children Safe in Education: Statutory guidance for educational establishments and colleges, 2020.

At least one member on every short listing and interview panel will have completed safer recruitment training. The principal is responsible for ensuring that safer recruitment training is kept up to date.

The principal and the nominated governor for safeguarding are responsible for ensuring that our single central record is accurate and up to date.

11 Procedure for Managing Allegations of Abuse Made Against College Staff Members and Volunteers

Our aim is to provide a safe and supportive environment which secures the wellbeing and very best outcomes for our children and young people. We do recognise that sometimes the behaviour of adults may lead to an allegation of abuse being made.

Allegations sometimes arise from a differing understanding of the same event, but when they occur they are distressing and difficult for all concerned. We also recognise that many allegations are genuine and there are some adults who deliberately seek to harm or abuse children and young people.

We will take all possible steps to safeguard our children and young people and to ensure that the adults in our college are safe to work with children. We will always ensure that the procedures outlined in Part 4 of Keeping Children Safe in Education: Statutory guidance for educational establishments and colleges, September 2020 are adhered to.

If an allegation is made or information is received about an adult who works in our setting which indicates that they may be unsuitable to work with children, the member of staff receiving the information should inform the Principal immediately. Should an allegation be made against the Principal, this will be reported to the Chair of Governors. In the event that the Principal and/or Chair of Governors are not contactable on that day, the information must be passed to and dealt with by either the member of staff acting as Principal or the Vice Chair of Governors.

The Principal or Chair of Governors will initially contact the Local Authority Designated Officer (LADO) to receive advice before undertaking further investigations.

Any member of staff or volunteer who does not feel confident to raise their concerns with the Principal or Chair of Governors should report their concerns directly to the LADO, Tania Brown, on 0161 342 4398 or at Tania.brown@tameside.gov.uk or the Tameside Children's Hub.

Supporting people:
- The College together with Children's Social Care and the police, if they are involved, will consider the impact on the child or young person concerned and provide support as appropriate.
- The Principal will ensure that the child and family are kept informed of the progress of the investigation.
- The Human Resources Team will be contacted at the earliest opportunity for advice in relation to the investigation of any allegation in line with the College's Disciplinary Policy, where appropriate.
- The staff member who is the subject of the allegation will be advised to contact their union, professional association or a colleague for support, (depending on the outcome of the safeguarding strategy meeting which is normally chaired by the LADO).
- The Human Resources Team will ensure that the staff member is provided with appropriate support, if necessary, through occupational health or welfare arrangements.
- The Principal will appoint a named representative to keep the staff member updated on the progress of the investigation; this will continue during any police or section 47 investigation or disciplinary investigation.

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

Referrals to Children's Social Care need to be considered when a child or young person is at risk of significant harm and an individual who is working or volunteering with children has:-

1. Behaved in a way that has harmed a child, or may have harmed a child

2. Possibly committed a criminal offence against or related to a child

3. Behaved towards a child or children in a way that indicates they may pose a risk of harm to children

When considering the definitions of harm and whether threshold is met for a LADO consultation or referral to Tameside Children's Hub, further guidance is available at https://www.tamesidesafeguardingchildren.org.uk/.

12 Supporting HE and Adult Learners

The College uses the term "HE and Adult Learner" to refer to students who are enrolled on one of the College's HE and Adult courses, and who is over the age of 18. Students who are over 18 but who are enrolled on a 16-19 course will fall under the policy and procedures applied to full time 16-19 students, as will part time learners aged 16-19 who are enrolled on part time adult learning courses.

More information regarding the support available to HE and Adult learners is available in section B of the full college Safeguarding and Child Protection Policy and Procedures.

12.1 Safeguarding Vulnerable Adults

A vulnerable adult is defined by Tameside Safeguarding Adults Partnership as someone who is over 18 years of age and in receipt or need of community care services in order to maintain their independence.

Adult students are able to disclose information about their circumstances at enrolment, induction and during their programme of study.

All staff working with HE and Adult learners receive safeguarding training as part of the College's training programme. Some team members also attend training on vulnerable adults where necessary.

Any member of staff who becomes aware of a situation should act. Staff can report their concerns to the DSL in college and/or contact Tameside Adult Safeguarding Team or, if applicable, Tameside Adult Social Care Team to report concerns or for more information. This can be done in complete confidence.

The wishes of the adult who is thought to be, or who reports that they are, at risk will be fully respected.

The DSL will liaise with all parties concerned to ensure the matter is responded to within the framework of Tameside Safeguarding Adults guidance and policies.

12.2 Safeguarding Non-Vulnerable Adults

If a member of staff suspects that an adult student who is not deemed to be 'vulnerable' under the definition provided is the subject of abuse, the full range of appropriate college support services should be offered. Where there is a suspicion that the abuse may involve criminal activity, this should be recorded, and with consent (or without, if danger level is deemed to be high – as long as the person is informed), this can be referred to the DSL and external referrals can be made.

It should be remembered that adults who are possibly experiencing abuse may live with younger siblings or have children of their own. The risk to these children should be considered. Actions taken by a member of staff should be appropriate and proportionate.

12.3 HE and Adult students with medical conditions, disabilities or specific learning difficulties

Adult students with medical conditions, disabilities or specific learning difficulties will have regular opportunities to disclose this information at Open Evenings/Events, Enrolment, Induction and whilst on programme.

If disclosed at enrolment (on enrolment form), this information will be recorded on the College's MIS system and communicated to relevant staff, including the College's Inclusive Learning Manager.

Students who disclose conditions whilst on programme – records will be made within the students on programme records and a referral made to the Inclusive Learning Manager for diagnostic assessment of needs.

The Inclusive Learning Manager will liaise with the HE and Skills learning team and advise on necessary adjustments and support.

Applications for additional time in exams will be processed by the Inclusive Learning team.

HE and Skills staff will be able to access all CPD relating to supporting learners with medical conditions, disabilities or specific learning difficulties.

12.4 Health and Safety of HE and Skills Learners

All HE and Skills Learners receive general advice about Health and Safety as part of their Induction. This is adapted for those studying at off site venues to include venue specific information.

Offsite venues will be checked through the College's Risk Assessment procedures to ensure their suitability for delivery of training.

Where a particular learner with identified needs is to be accommodated, a specific risk assessment will be undertaken and staff and learners advised accordingly.

Learners in the workplace will:
- be requested to supply a copy of their Employer's Public/Employer Liability insurance if staff members will be assessing on site.
- be requested to supply DBS proof – if the course relates to working with children, young people or vulnerable adults
- complete a Learner Health & Safety form with their tutor/trainer/teacher

Plus, the place of work will be subject to a Risk Assessment following the College's Risk Assessment procedure. College staff will only undertake training and assessing activities with work-based learners on employer premises once all the above are in place.

All adult learners who are embarking on a programme of work based learning complete a more detailed review of Health and Safety as part of their Induction phase.

HE and Skills students are issued with identity swipecards, and a Card Entry system and policy is followed for HE and Skills students.

Site staff will conduct an annual review of evening site use in liaison with the HE and Skills Team to assess safety and potential risks posed by the different arrangements for entrances and exits in the evenings.

Annex 1: COVID-19 College closure arrangements for Safeguarding and Child Protection at Ashton Sixth Form College

School Name: Ashton Sixth Form College
Policy owner: Chris Cox & Shane Kelly
Date: 1st April 2020
Date shared with staff: 2nd April 2020

1. Context

From 20th March 2020 parents were asked to keep their children at home, wherever possible, and for colleges to remain open only for those children of workers critical to the COVID-19 response - who absolutely need to attend.

As a post-16 provider Ashton Sixth Form College – in consultation with similar providers in the region – offered the opportunity to provide care for children who are vulnerable, looked after children, children who are local authority looked after and children with EHC plans.

This addendum of the Ashton Sixth Form College Safeguarding and Child Protection policy contains details of our individual safeguarding arrangements in the following areas:

Key contacts

Role	Name	Contact number	Email
Designated Safeguarding Lead	Chris Cox	07530577216	christopher.cox@asfc.ac.uk
Deputy Designated Safeguarding Leads	Shane Kelly	07530577238	shane.kelly@asfc.ac.uk
Principal	Anton McGrath	07976 681289	anton.mcgrath@asfc.ac.uk
Safeguarding Governor	Chris Lyness	Contact Carolyn Wright (Clerk) for contact details	Contact Carolyn Wright (Clerk) for contact details

Safeguarding Team
Anita Blank 07813456926
Anna Harvey 07814458201
Jane Martin 07890 590728
Claire Shaw 0161 330 2330
Genevieve Velarde 0161 330 2330

2. Vulnerable children

Vulnerable children include those who have a social worker and those children and young people up to the age of 25 with education, health and care (EHC) plans.

Those who have a social worker include children who have a Child Protection Plan and those who are looked after by the Local Authority. A child may also be deemed to be vulnerable if they have been assessed as being in need or otherwise meet the definition in section 17 of the Children Act 1989, Child In Need.

Those with an EHC plan will be risk-assessed in consultation with the Local Authority and parents, to decide whether they need to continue to be offered a school or college place in order to meet their needs, or whether they can safely have their needs met at home. This could include, if necessary, carers, therapists or clinicians visiting the home to provide any essential services. Many children and young people with EHC plans can safely remain at home.

Eligibility for free school meals in and of itself is not a determining factor in assessing vulnerability.

Senior leaders, especially the Designated Safeguarding Lead (and deputy) know who our most vulnerable children are. They have the flexibility to offer a place to those on the edge of receiving children's social care support.

Ashton Sixth Form College will continue to work with and support children's social workers to help protect vulnerable children. This includes working with and supporting children's social workers and the local authority virtual school head (VSH) for looked-after and previously looked-after children. The lead person for this will be Shane Kelly.

Where parents are concerned about the risk of the child contracting COVID19, Ashton Sixth Form College or the social worker will talk through these anxieties with the parent/carer following the advice set out by Public Health England.

Ashton Sixth Form College will encourage all students – including our vulnerable children and young people - to engage with their learning under the guidance of its dedicated staff remotely if required and provide full guidance in doing so.

3   Attendance monitoring

Local authorities and education settings do not need to complete their usual day-to-day attendance processes to follow up on non-attendance.

If Ashton Sixth Form College has any children in attendance (e.g. because they are vulnerable) we will submit the daily attendance sheet to the DfE by 12 noon - https://www.gov.uk/government/publications/coronavirus-covid-19-attendance-recording-for-educational-settings

If the College has closed, we will complete the return once as requested by the DfE.

Ashton Sixth Form College will ensure that 'at risk' students have the opportunity to attend the College where they will be able to work under supervision but will monitor this services in terms of take up and will keep this under review accordingly. A register of those students who do attend will be kept and maintained for our own monitoring and safeguarding purposes.

To support the above, Ashton Sixth Form College will, when communicating with parents/carers and carers, confirm emergency contact numbers are correct and ask for any additional emergency contact numbers where they are available.

4   Designated Safeguarding Lead

Ashton Sixth Form College has a Designated Safeguarding Lead (DSL) and a Deputy DSL.

The Designated Safeguarding Lead is: Chris Cox

The Deputy Designated Safeguarding Lead is: Shane Kelly

The optimal scenario is to have a trained DSL (or deputy) available on site. Where this is not the case a trained DSL (or deputy) will be available to be contacted via phone or online video - for example when working from home.

Where a trained DSL (or deputy) is not on site, in addition to the above, a senior leader will assume responsibility for co-ordinating safeguarding on site.

This might include updating and managing access to child protection details via Cedar and by liaising with the offsite DSL (or deputy) and as required liaising with children's social workers where they require access to children in need and/or to carry out statutory assessments at the college.

All Ashton Sixth Form College staff and volunteers have access to a trained DSL (or deputy). On each day, the staff on site will be made aware of who that person is and how to contact them.

The DSL will continue to engage with social workers, and attend all multi-agency meetings, which can be done remotely.

5   Reporting a concern

Where staff have a concern about a student, they should continue to follow the process outlined in the College Safeguarding Policy, this includes making a report via agreed College Systems (Cedar), which can be done remotely.

In the unlikely event that a member of staff cannot access electronic systems from home, they should call the Designated Safeguarding Lead to discuss the matter. This will ensure that the concern is received.

Staff are reminded of the need to report any concern immediately and without delay.

Where staff are concerned about an adult working with children in the college, they should report the concern to the Principal or senior leader. If there is a requirement to make a notification to the Principal whilst away from college, this should be done verbally and followed up with an email to the Principal.

Concerns around the Principal should be directed to the Chair of Governors: Colin Challenger – contact details can be obtained via Carolyn Wright (Clerk to the Governing Body).

6   Safeguarding Training and induction

DSL training is very unlikely to take place whilst there remains a threat of the COVID 19 virus.

For the period COVID-19 measures are in place, a DSL (or deputy) who has been trained will continue to be classed as a trained DSL (or deputy) even if they miss their refresher training.

All existing school staff have had safeguarding training and have read part 1 of Keeping Children Safe in Education (2020). The DSL should communicate with staff any new local arrangements, so they know what to do if they are worried about a child.

Where new staff are recruited, or new volunteers enter Ashton Sixth Form College, they will continue to be provided with a safeguarding induction. In turn, they will e-mail the college's HR Manager to confirm that they have read and understand the Safeguarding Training and the Keeping Children Safe In Education 2020 Part 1.

If staff are deployed from another education or children's workforce setting to our college, we will take into account the DfE supplementary guidance on safeguarding children during the COVID-19 pandemic and will accept portability as long as the current employer confirms in writing that:

- the individual has been subject to an enhanced DBS and children's barred list check
- there are no known concerns about the individual's suitability to work with children
- there is no ongoing disciplinary investigation relating to that individual

Upon arrival, they will be given a copy of the College's safeguarding and child protection policy, confirmation of local processes and confirmation of DSL arrangements.

7   Safer recruitment/volunteers and movement of staff

It remains essential that people who are unsuitable are not allowed to enter the children's workforce or gain access to children. When recruiting new staff, Ashton Sixth Form College will continue to follow the relevant safer recruitment processes for their setting, including, as appropriate, relevant sections in part 3 of Keeping Children Safe in Education (2020) (KCSIE).

In response to COVID-19, the Disclosure and Barring Service (DBS) has made changes to its guidance on standard and enhanced DBS ID checking to minimise the need for face-to-face contact.

If staff are deployed from another education or children's workforce setting to our college, we will take into account the DfE supplementary guidance on safeguarding children during the COVID-19 pandemic and will accept portability as long as the current employer confirms in writing that:-

- the individual has been subject to an enhanced DBS and children's barred list check
- there are no known concerns about the individual's suitability to work with children
- there is no ongoing disciplinary investigation relating to that individual

Where Ashton Sixth Form College is utilising volunteers, we will continue to follow the checking and risk assessment process as set out in paragraphs 167 to 172 of KCSIE. Under no circumstances will a volunteer who has not been checked be left unsupervised or allowed to work in regulated activity.

The College will continue to follow the legal duty to refer to the DBS anyone who has harmed or poses a risk of harm to a child or vulnerable adult. Full details can be found at paragraph 163 of KCSIE.

Ashton Sixth Form College will continue to consider and make referrals to the Teaching Regulation Agency (TRA) as per paragraph 166 of KCSIE and the TRA's 'Teacher misconduct advice for making a referral.

During the COVID-19 period all referrals should be made by emailing Misconduct.Teacher@education.gov.uk

Whilst acknowledging the challenge of the current National emergency, it is essential from a safeguarding perspective that any school or college is aware, on any given day, which staff/volunteers will be in the school or college, and that appropriate checks have been carried out, especially for anyone engaging in regulated activity. As such, Ashton Sixth Form College will continue to keep the single central record (SCR) up to date as outlined in paragraphs 148 to 156 in KCSIE.

8   Online safety in schools and colleges

Ashton Sixth Form College will continue to provide a safe environment, including online. This includes the use of an online filtering system.

Where students are using computers on site, appropriate supervision will be in place.

9   Children and online safety away from school and college

It is important that all staff who interact with students, including online, continue to look out for signs a child may be at risk. Any such concerns should be dealt with as per the Child Protection Policy and where appropriate referrals should still be made to children's social care and as required, the police.

Online teaching should follow the same principles as set out in the MAT code of conduct.

Ashton Sixth Form College will ensure any use of online learning tools and systems is in line with privacy and data protection/GDPR requirements.

Below are some things to consider when delivering virtual lessons, especially where webcams are involved (this method has currently been stopped at ASFC, but could be reviewed depending upon the length of the national crisis):

- No 1:1s, groups only
- Staff and children must wear suitable clothing, as should anyone else in the household.
- Any computers used should be in appropriate areas, for example, not in bedrooms; and the background should be blurred.
- The live class should be recorded so that if any issues were to arise, the video can be reviewed.
- Live classes should be kept to a reasonable length of time, or the streaming may prevent the family 'getting on' with their day.
- Language must be professional and appropriate, including any family members in the background.

- Staff must only use platforms specified by senior managers and approved by our IT network manager / provider to communicate with pupils
- Staff should record, the length, time, date and attendance of any sessions held.

10 Supporting children not in school

Ashton Sixth Form College is committed to ensuring the safety and wellbeing of all its Children and Young people.

Where the DSL has identified a child to be on the edge of social care support, or who would normally receive pastoral-type support in school, they should ensure that a robust communication plan is in place for that child or young person.

Details of this plan must be recorded through the secure electronic safeguarding system, as should a record of contact have made (recorded on Cedar).

The communication plans include remote and phone contact. Other individualised contact methods should be considered and recorded.

Ashton Sixth Form College and its DSL will work closely with all stakeholders to maximise the effectiveness of any communication plan.

This plan must be reviewed regularly (at least once a fortnight) and where concerns arise, the DSL and/or Deputy DSL will consider any referrals as appropriate.

The College will share safeguarding messages on its website and social media pages.

Ashton Sixth Form College recognises that its environment provides a protective factor for children and young people, and that current circumstances can affect the mental health of pupils and their parents/carers. Teachers at Ashton Sixth Form College need to be aware of this in setting expectations of students' work where they are at home.

11 Supporting children at Ashton Sixth Form College

Ashton Sixth Form College is committed to ensuring the safety and wellbeing of all its students.

The College will continue to be a safe space for all students to attend and flourish. The Principal will ensure that appropriate staff are on site and staff to pupil ratio numbers are appropriate, to maximise safety.

Ashton Sixth Form College will refer to the Government guidance for education and childcare settings on how to implement social distancing and continue to follow the advice from Public Health England on handwashing and other measures to limit the risk of spread of COVID19.

The College will ensure that where we care for vulnerable young people on site, we ensure appropriate support is in place for them. This will be bespoke to each student and recorded on schools safeguarding system.

Where the College has concerns about the impact of staff absence – such as our Designated Safeguarding Lead or first aiders – we will discuss them immediately with the chair of governors and senior leaders.

12 Peer on Peer Abuse

Ashton Sixth Form College recognises that during the closure a revised process may be required for managing any report of such abuse and supporting victims**.**

Where the College receives a report of peer on peer abuse, we will follow the principles as set out in part 5 of KCSIE and of those outlined within of the Child Protection Policy.

The College will listen and work with the young person, parents/carers and any multi-agency partner required to ensure the safety and security of that young person.

Concerns and actions will be recorded on school's safeguarding system and appropriate referrals made.

As part of our commitment to safeguard our students through these unusual times, we have added two buttons to our website. They can be found in the Student Life section in the IT section under IT and Learning Resources. They can also be accessed at https://www.asfc.ac.uk/student-life/lrc . We have added the CEOP (Child Exploitation and Online Protection Command) button so students can report inappropriate content or the way someone has been communicating with them online. We have also added the UK Safer Internet Centre button for advice on how your sons and daughters can keep themselves safe online.

Appendix 1

Covid 19 Health Emergency – Supporting Vulnerable Students – March 2020

Ensuring that our most vulnerable students are provided with the most effective support possible under the current circumstances has been a priority for the safeguarding team. Prior to the College closuring a strategy has been agreed and shared amongst the safeguarding team and all senior tutors. It will remain in place until the College is able to re-open.

Senior Tutors and the Safeguarding Team have shared contact numbers and will use the College email system and Cedar to communicate any concerns relating to our vulnerable students. Established safeguarding practice will continue to be applied throughout this time although the method of monitoring has of course necessarily been adapted under what is a fluid and changing social environment, marked particularly within a context of increased self-isolation and restricted interpersonal interactions. We acknowledge that the current situation raises a number of challenges for all our students, and that these will have a particular impact on our most vulnerable. Our current strategy and responses must be as robust as possible and incorporates latest Government advice and guidance. Agreed protocols can be summarised accordingly:

1. An opportunity has been provided for our most vulnerable and at risk students to attend the College site on a non-compulsory basis, in line with initial guidance from the Department of Education. Relevant categories of students have been informed of this provision, including registered carers, looked after children and those students on EHC plans. Provision has been reviewed by SLT in light of take-up and in conjunction with discussions with other local providers.

2. If any potential safeguarding concern comes to the attention of a member of staff they should communicate this to either Chris Cox or Shane Kelly in the first instance, or any member of the safeguarding team. This has been communicated to all staff.

3. Each Senior Tutor is checking in on the progress of their identified vulnerable/at risk students weekly, and briefly recording details of contact on Cedar. A round-up of these interactions will be shared with Chris Cox and Shane Kelly. Further actions if appropriate can then be actioned.

4. Currently there are no students at the College who have been placed on Child Protection intervention (Section 47) by their respective local authorities. However, we currently have three students subject to Child in Need Plans (Section 17). Regular contact will be maintained with these students and updates provided to named case social workers.

5. Where a vulnerable student and/or parent is not engaging and therefore causing concern to the Senior Tutor their allocated social worker should be contacted. In instances where there is no social worker Chris Cox and/or Shane Kelly will be informed and initiate appropriate response/intervention.

6. Students currently receiving counselling support at the College will continue to be contacted throughout the duration of the College's closure by our two counsellors. Individuals will negotiate the extent and regularity of contact required. Unfortunately, we will be unable to initiate any new referrals as this would compromise contracting and confidentiality procedures however all senior tutors have been asked to refer students to established on-line sources of support should this be required and where it is appropriate to do so.

The above protocols – in conjunction with the amended Safeguarding and Child Protection policy – will help us ensure that we continue to effectively discharge our statutory safeguarding responsibilities during what is an unprecedented and challenging period.