



South Gloucestershire and Stroud College

Safeguarding Learners & Child Protection Policy & Procedure

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SGS College
Safeguarding Learners & Child Protection Policy & Procedure

1. Policy Intent

- 1.1. As a college delivering education to learners across a wide range of ages, including adults participating in Higher Education, this policy and procedure details how we safeguard our staff and learners regardless of the stage of their educational journey. Staff and Governors at South Gloucestershire and Stroud College (SGS) are fully committed to providing the safest possible environment for our learners to study and train in and for our staff to work within. We prioritise and promote the safeguarding and protection of all our learners from harm, whatever their age, culture, disability, gender, language, race, religion / belief and / or sexual orientation.
- 1.2. We have a zero-tolerance approach to any type of abuse and our staff and governors are trained in how to raise any concerns they may have and how to handle a disclosure from learners or staff in a safe and confidential way. The culture of our College is to provide an environment that respects and values difference and we have no tolerance for any behaviour, that may be demeaning or disrespectful to anyone. The routes for reporting inappropriate behaviour are safe and clearly signposted, as are the potential consequences for anyone who chooses to act in an inappropriate way.
- 1.3. All governors and trustees also receive training that equips them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place are effective and support the delivery of a robust whole College approach to safeguarding.

2. Scope

- 2.1. Safeguarding and promoting the welfare of our learners is everyone's responsibility. **Everyone** who comes into contact with our learners and their families has a role to play. To fulfil this responsibility effectively, all practitioners should make sure their approach is learner centred. This means that they should consider, at all times, what is in the best interests of the learner.
- 2.2. No single practitioner can have a full picture of a learner's needs and circumstances. If learners and families are to receive the right help at the right time, everyone who comes into contact with them has a role to play in identifying concerns, sharing information and taking prompt action.

3. Procedures

- 3.1. Although the definitions for safeguarding and promoting the welfare of children within the 'Keeping Children Safe in Education' guidance (KCSIE 2023) specifically refers to children, as this policy covers all our learners, for the purposes of this policy, safeguarding and promoting the welfare of our learners is defined as:
 - protecting our learners from maltreatment;
 - preventing impairment of our learners mental and physical health or development;
 - ensuring that our learners grow up in circumstances consistent with the provision of safe and effective care; and
 - taking action to enable all our learners to have the best outcomes.

- 3.2. 'Child' is defined as: Any learner under the age of 18.
- 3.3. 'Young Person' is defined as: Any learner under the age of 18.
- 3.4. 'Vulnerable Adult' is defined as: A learner aged 18 years or over who is or may be in need of community care services by reason of disability, age or illness; and who is or may be unable to take care of him or herself, or unable to protect him or herself against significant harm or exploitation.
- 3.5. 'Learner' is defined as a learner of whatever age engaging in education with SGS College:
- 3.6. The College recognises that some adults are also vulnerable to abuse. Accordingly, the procedures may be applied (with appropriate adaptations) to allegations of abuse and the protection of our learners.
- 3.7. SGS College will follow the relevant Child Protection Procedures for geographies across the Southwest region, while always placing the welfare of the learner at the centre of any actions taken. Further details are available at <https://www.proceduresonline.com/swcpp/>.

4. Information for ALL Staff (including supply staff and volunteers)

- 4.1. Our staff are particularly important, as they are in the position to identify concerns early, provide help for learners, promote learner's welfare and prevent concerns from escalating.
- 4.2. **All** staff have a responsibility to provide a safe environment in which learners can learn and all staff should be prepared to identify learners who may benefit from early help. Early help means providing support as soon as a problem emerges at any point in a learner's life.
- 4.3. If you have **any concerns** about a learner's welfare, you should act on them immediately. **Appendix 2** shows a flow chart setting out the process to follow when you have concerns about a learner.
- 4.4. **Any staff member** who has any concerns about a learner's welfare should follow the referral processes set out in **Appendix 2**. Staff should expect to support social workers and other agencies following any referral.
- 4.5. The Teachers' Standards 2012 state that teachers (which includes headteachers) should safeguard children's wellbeing and maintain public trust in the teaching profession as part of their professional duties.
- 4.6. All staff should be aware of the systems within the College which support safeguarding and these are explained to them as part of staff induction. This includes:
 - This policy and procedure, which amongst other things includes the procedures to deal with child-on-child abuse;
 - Positive behaviour policy (which includes measures to prevent bullying, including cyberbullying, prejudice-based and discriminatory bullying);
 - Staff code of conduct (which amongst other things, includes the procedure for dealing with low-level concerns, allegations against staff and whistleblowing); ([Code of Conduct \(staff\).docx](#))

- [Fitness to Study Policy & Procedure](#)
 - Safeguarding response to learners who go missing from education; and
 - Role of the Designated Safeguarding Lead (including the identity of the designated safeguarding lead and any deputies); and
 - Copies of policies and a copy of Part 1 (or Annex A of KCSIE 2023, as appropriate).
- 4.7. **All** staff receive safeguarding and child protection training which is regularly updated. In addition, all staff receive safeguarding and child protection (including online safety) updates (for example, via email, e-bulletins; Planet e-Stream; and curriculum and corporate meetings), as required, and at least annually, to provide them with relevant skills and knowledge to safeguard learners effectively.
- 4.8. **All** staff should be aware of their local Early Help process and understand their role in it.
- 4.9. **All** staff should be aware of the processes for making referrals to Children’s Social Care and for statutory assessments under the Children Act 1989, especially section 17 (children in need) and section 47 (a child suffering, or likely to suffer, significant harm) that may follow a referral, along with the role they might be expected to play in such assessments.
- 4.10. **All** staff should know what to do if a learner tells them they are being abused, exploited, or neglected. Staff should know how to manage the requirement to maintain an appropriate level of confidentiality. This means only involving those who need to be involved, such as the DSL, DDSL or other designated members of staff with responsibility for safeguarding shown in the [SGS College Safeguarding Key Contacts List](#).
- 4.11. **All** staff should be able to reassure a learner making a disclosure that they are being taken seriously, regardless of how long it has taken them to come forward and that they will be supported and kept safe. Learners should never be given the impression that they are creating a problem by reporting abuse, exploitation, and / or neglect. Nor should any learner ever be made to feel ashamed for making a report. It is important to explain that the law is in place to protect children and young people rather than to criminalise them.
- 4.12. **All** staff should be aware that learners may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and / or they may not recognise their experiences as harmful. For example, learners may feel embarrassed, humiliated, or being threatened. This could be due to their vulnerability, disability and / or sexual orientation or language barriers. This should not prevent staff from having a professional curiosity and speaking to the DSL, DDSL or other designated members of staff with responsibility for safeguarding shown in the [SGS College Safeguarding Key Contacts List](#). It is also important that staff determine how best to build trusted relationships with learners which facilitate communication.
- 4.13. Mandatory annual safeguarding and induction training for all staff, includes training specifically related to online safety. This provides staff with amongst other things, an understanding of the expectations, roles and responsibilities the College’s filtering and monitoring systems.

5. Early Help

- 5.1. Any learner may benefit from Early Help, but all staff should be particularly alert to the potential need for early help for a learner who:
- Is disabled or has certain health conditions and has specific additional needs;
 - Has special educational needs (whether or not they have a statutory Education, Health and Care Plan);
 - Has a mental health need;
 - Is a young carer;
 - Is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines;
 - Is frequently missing / goes missing from care or from home;
 - Is at risk of modern slavery, trafficking, sexual or criminal exploitation;
 - Is at risk of being radicalised or exploited;
 - Has a family member in prison, or is affected by parental offending;
 - Is in a family circumstance presenting challenges for the learner, such as drug and alcohol misuse, adult mental health issues and domestic abuse;
 - Is misusing drugs or alcohol themselves;
 - Has returned home to their family from care;
 - Is at risk of 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage;
 - Is a privately fostered child; and
 - Is persistently absent from education, including persistent absences for part of the college day.

6. Abuse & Neglect

- 6.1. **All** staff should be aware of indicators of abuse and neglect, understanding that learners can be at risk of harm inside and outside of the college, home and online. Exercising professional curiosity and knowing what to look for is vital for the early identification of abuse and neglect so that staff are able to identify cases of learners who may be in need of help or protection.
- 6.2. **All** staff should be aware that abuse, neglect and safeguarding issues are rarely standalone events and cannot be covered by one definition or one label alone. In most cases, multiple issues will overlap with one another, therefore staff should always be vigilant and always follow the referral processes set out in **Appendix 2**.
- 6.3. **All** staff, should consider whether learners are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and learners can be vulnerable to multiple harms including (but not limited to) sexual abuse (including harassment and exploitation), domestic abuse in their own intimate relationships (teenage relationship abuse), criminal exploitation, serious youth violence, county lines and radicalisation.
- 6.4. **All** staff should be aware that technology is a significant component in many safeguarding and wellbeing issues. Learners are at risk of abuse online as well as face to face. In many cases abuse will take place concurrently via online channels and in daily life. Learners can also abuse their peers online, this can take the form of abusive, harassing, and misogynistic/misandrist messages, the non-consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography, to those who do not want to receive such content.

- 6.5. In all cases, if staff are unsure, they should always speak to the DSL, DDSL or other designated members of staff with responsibility for safeguarding shown in the [SGS College Safeguarding Key Contacts List](#).

7. Indicators of Abuse and Neglect

- 7.1. **Abuse:** is a form of maltreatment. Abuse or neglect can be caused by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse. Abuse may occur within a family or in an institution or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Abuse can be inflicted by an adult or adults or by another child or children.
- 7.2. **Emotional Abuse:** is persistent emotional maltreatment such as to cause severe and adverse effects on another's emotional development. It may involve conveying to someone that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the person opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed. These may include interactions that are beyond a person's developmental capability as well as overprotection and limitation of exploration and learning or preventing the person participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing frequent feelings of fear or danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.
- 7.3. **Neglect:** is the persistent failure to meet basic physical and/or psychological needs, likely to result in the serious impairment of health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Neglect may involve a parent or carer failing to:
- provide adequate food, clothing and shelter (including exclusion from home or abandonment);
 - provide protection from physical and emotional harm or danger;
 - ensure adequate supervision (including the use of inadequate caregivers); or
 - ensure access to appropriate medical care or treatment.
- It may also include neglect of, or unresponsiveness to basic emotional needs.
- 7.4. **Physical Abuse:** is a form of abuse that may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, or otherwise causing physical harm. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.
- 7.5. **Sexual Abuse:** involves forcing or enticing someone to take part in sexual activities, not necessarily involving a high level of violence, whether or not they are aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually

inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education and **all** staff should be aware of it and of their college policy and procedures for dealing with it.

8. Safeguarding Issues

- 8.1. **All** staff should have an awareness of safeguarding issues that can put learners at risk of harm. Behaviours linked to issues such as drug taking, alcohol misuse, deliberately missing education, serious violence (including that linked to county lines), radicalisation and consensual and non-consensual sharing of nude and semi-nude images and / or videos can be signs that learners are at risk.
- 8.2. **Annex B of KCSIE 2023 (pages 141 - 163)** contains important information about specific forms of abuse and safeguarding issues, all staff with direct contact with learners should read this section in full. Types of abuse are difficult to define precisely or fully. However, the following examples are indicative of various types of abuse:

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

Both CSE and CCE are forms of abuse that occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in sexual or criminal activity, in exchange for something the person needs or wants, and / or for the financial advantage or increased status of the perpetrator or facilitator and / or through violence or the threat of violence. CSE and CCE can affect children, both male and female and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation.

8.2.2. Child Criminal Exploitation (CCE)

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

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

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

8.2.3. Child Sexual Exploitation (CSE)

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

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

CSE can affect any child, who has been coerced into engaging in sexual activities. This includes 16 and 17 year olds who can legally consent to have sex. Some children may not realise they are being exploited e.g. they believe they are in a genuine romantic relationship.

8.2.4. Radicalisation

Learners may be susceptible to extremist ideology and radicalisation and as with other forms of harm and abuse this forms part of our safeguarding approach.

'The Prevent duty' section of KCSIE 2023 clarifies that an individual needs to consent to any support delivered through the Channel programme, and signposts to the DfE's [The Prevent duty: safeguarding learners vulnerable to radicalisation](#) guidance.

8.2.5. Domestic Abuse

Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional. Children can be affected by domestic abuse. They may see, hear, or experience the effects of abuse at home and / or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have a detrimental and long-term impact on their health, well-being, developmental, and ability to learn.

8.2.6. Forced Marriage

Forcing a person into marriage is a crime in England and Wales, since February 2023 it is now also a crime to carry out any conduct whose purpose is to cause a child to marry before their 18th birthday, even if violence, threats or other forms of coercion are not used. Refer to the Home Office's new [forced marriage resource pack](#) for further advice and support.

8.2.7. Female Genital Mutilation (FGM)

FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of abuse with long-lasting harmful consequences.

Whilst staff should speak to the DSL, DDSL or other designated members of staff, with responsibility for Safeguarding with regard to any concerns about FGM shown in the [SGS College Safeguarding Key Contacts List](#). **There is specific legal duty on teachers.** If a teacher, in the course of their work in the profession, discovers that an act of FGM appears

to have been carried out on a girl under the age of 18, the teacher **must** report this to the police.

It is recommended that you make a report orally by **calling 101**, the single non-emergency number. When you call 101, the system will determine your location and connect you to the police force covering that area.

8.2.8. Mental Health

All staff should also be aware that mental health problems can, in some cases, be an indicator that a learner has suffered or is at risk of suffering abuse, neglect or exploitation.

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

Where learners have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these learner's experiences, can impact on their mental health, behaviour and education. Public Health England has produced a range of resources to support teachers to promote positive health, wellbeing and resilience. See [Every Mind Matters](#) for links to all materials and lesson plans. More information can be found in the [Mental Health and Behaviour in Schools Guidance](#).

If staff have a mental health concern about a learner that is also a safeguarding concern, immediate action should be taken, following this policy and speaking to the DSL, DDSL or other designated members of staff with responsibility for safeguarding shown in the [SGS College Safeguarding Key Contacts List](#).

8.2.9. Child on Child Abuse

All staff should be aware that learners can abuse other learners (often referred to as peer-on-peer abuse). It can happen both inside and outside of College and online. **All** staff should be clear as to the college's policy and procedures with regard to child-on-child abuse and the important role they have to play in preventing it and responding where they believe a learner may be at risk from it.

All staff should understand, that even if there are no reports in their college it does not mean it is not happening, it may be the case that it is just not being reported. As such it is important if staff have any concerns regarding child on child abuse, they should speak to the DSL, DDSL or other designated members of staff with responsibility for safeguarding shown in the [SGS College Safeguarding Key Contacts List](#).

It is essential that **all** staff understand the importance of challenging inappropriate behaviours between learners, many of which are listed below, that are abusive in nature. SGS College has a zero-tolerance approach to these types of behaviours.

Downplaying certain behaviours, for example dismissing sexual harassment as "just banter", "just having a laugh", "part of growing up" "girls being girls" or "boys being boys" can lead to a culture of unacceptable behaviours, an unsafe environment for learners and in worst case scenarios a culture that normalises abuse leading to learners accepting it as normal and not coming forward to report it.

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

- Bullying (including cyberbullying, prejudice-based and discriminatory bullying);
- Abuse in intimate personal relationships between learners (sometimes known as ‘teenage relationship abuse’);
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and / or encourages physical abuse);
- Sexual violence, such as rape, assault by penetration and sexual assault; (this may include an online element which facilitates, threatens and / or encourages sexual violence);
- Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse;
- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party;
- Consensual and non-consensual sharing of nudes and semi-nude images and / or videos (also known as sexting or youth produced sexual imagery); upskirting, which typically involves taking a picture under a person’s clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm; and
- Initiation / hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

8.2.10. Serious Violence

All staff should be aware of the indicators, which may signal learners are at risk from, or are involved with serious violent crime. These may include increased absence from college, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that learners have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation.

9. Additional Information and Support

- 9.1. Departmental advice [What to Do if You Are Worried a Child is Being Abused - Advice for Practitioners](#) provides more information on understanding and identifying abuse and neglect. Examples of potential indicators of abuse and neglect are highlighted throughout the advice and will be particularly helpful for staff. The [NSPCC](#) website also provides useful additional information on abuse and neglect and what to look out for.

10. What staff should do if they have concerns about a learner

- 10.1. Staff working with learners are advised to maintain an attitude of **'it could happen here'** where safeguarding is concerned. When concerned about the welfare of a learner, staff should always act in the **best** interests of the learner.
- 10.2. It is important to realise that learners may find it difficult to tell anyone about their abuse verbally. Learners may show signs or act in ways that they hope staff will notice and react to.
- 10.3. If staff have **any concerns** about a learner's welfare, they should act on them **immediately** and always follow the referral processes set out in **Appendix 2**.
- 10.4. **All** staff should be clear as to the College's safeguarding learners and child protection policy and procedure. and speak to the DSL, DDSL or other designated members of staff with responsibility for safeguarding shown in the [SGS College Safeguarding Key Contacts List](#). Options will then include:
 - Managing any support for the learner internally via the college's own pastoral support processes;
 - Undertaking an early help assessment; or
 - Making a referral to statutory services, for example as a learner might be in need, is in need or suffering, or is likely to suffer harm.
- 10.5. The DSL, DDSL or other designated members of staff with responsibility for safeguarding are available during office hours to discuss safeguarding concerns.
- 10.6. Staff should not assume a colleague, or another professional will take action and they should share information that might be critical in keeping learners safe. They should be mindful that early information sharing is vital for effective identification, assessment and allocation of appropriate service provision.

11. Responding to a Disclosure or Allegation of Abuse

- 11.1. If you're in a situation where a learner discloses abuse to you, your initial response is incredibly important. How you respond can encourage or undermine the confidence of learners to make disclosures. Some key things to remember are:
 - Listen carefully to the learner. Avoid expressing your own views on the matter. A reaction of shock or disbelief could cause the learner to 'shut down', retract or stop talking.
 - Find an appropriate opportunity to explain that the information will need to be shared with others. Do not promise to keep the information confidential or a 'secret'.
 - Allow the learner to continue at her / his own pace and don't interrupt if the learner is freely recalling events.
 - Avoid asking questions or pressing for more information. Ask for clarification only. If questions are necessary, only ask open questions: Tell me... Explain to me... Describe to me...
 - Let them know they've done the right thing. Reassurance can make a big impact to the learner who may have been keeping the abuse secret.
 - Tell them it's not their fault. Abuse is never the learner's fault and they need to know this.
 - Say you will take them seriously. A learner could keep abuse secret in fear they won't be believed.

- They've told you because they want help and trust you'll be the person who will listen to and support them.
- Don't talk to the alleged abuser. Confronting the alleged abuser about what the learner's told you could make the situation a lot worse for the learner.
- Explain what you'll do next. If age appropriate, explain to the learner you'll need to report the abuse to someone who will be able to help.
- Don't delay reporting the abuse. The sooner the abuse is reported after the learner discloses the better. Report as soon as possible so details are fresh in your mind and action can be taken quickly. You can report a concern using [The Safeguarding Company \(previously My Concern\)](#), or speak to a member of the safeguarding team (within 2 hours).

NOTE: Disclosures relating to allegations against colleagues and members of staff (including supply staff, volunteers and contractors) should be treated in the same way. This information must be passed immediately to the DSL or DDSL who will ensure the appropriate procedures are followed.

12. Keeping Records

12.1. All concerns, discussions and decisions made, and the reasons for those decisions, should be recorded on [The Safeguarding Company \(previously My Concern\)](#). If in doubt about recording requirements, staff should discuss with the DSL, DDSL or other designated members of staff with responsibility for safeguarding shown in the [SGS College Safeguarding Key Contacts List](#). Records should include:

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

12.2. It is important for learners to receive the right help at the right time to address safeguarding risks and prevent issues escalating and to promote learner's welfare. Research and serious case reviews have repeatedly shown the dangers of failing to take effective action. Examples of poor practice include:

- Failing to act on and refer the early signs of abuse and neglect;
- Poor record keeping;
- Failing to listen to the views of the learner;
- Failing to re-asses concerns when situations do not improve;
- Not sharing information with the right people within and between agencies;
- Sharing information too slowly; and
- A lack of challenge to those who appear not to be taking action.

13. Allegations Management Procedure

13.1. SGS College promotes an open and transparent culture in which all concerns about any adult working in or on behalf of the college (including supply staff, volunteers and contractors) are dealt with promptly and appropriately. Our approach will enable the identification of concerning, problematic or inappropriate behaviour early; minimise the risk of abuse; and ensure that staff are clear about professional boundaries and act within these boundaries and in accordance with the ethos and values of the college. Any concern, even allegations that do not meet the harms threshold should be shared responsibly and with the right person, recorded and dealt with appropriately.

- 13.2. Although [Keeping Children Safe In Education 2023](#) differentiates between allegations or concerns that may meet the harm threshold and those that do not meet the harm threshold. Our process is the same for both situations, if staff have safeguarding concerns, or an allegation is made about another member of staff (including supply staff, volunteers, and contractors) posing a risk of harm to a learner, then they should immediately report it to the DSL or DDSL, either in person or via [The Safeguarding Company \(previously My Concern\)](#). They in turn, will notify the Principal and Human Resources (HR).
- 13.3. Where there are safeguarding concerns, or an allegation is made about the DSL or DDSL, this should be referred to the Principal.
- 13.4. Where there are safeguarding concerns, or an allegation is made about the Principal, this should be referred to the Chair of Governors.
- 13.5. The DSL or DDSL will report the incident to the Local Authority Designated Officer (LADO).
- 13.6. For details of current post holders and their contact information, please see the [SGS College Safeguarding Key Contacts List](#).
- 13.7. **Appendix 4** provides a summary of the Allegations Management Procedure for allegations or concerns that may meet the threshold. This should also be used if an allegation is received about an individual or the organisation concerning incidents that happen when the college's premises are being used by external providers.
- 13.8. **For** any allegations or concerns that do not meet the threshold, the college will use the procedures within the [Staff Code of Conduct](#) and have reference to the [Guidelines on Maintaining Professional Boundaries](#).

14. Whistleblowing

- 14.1. All staff should feel able to raise concerns about poor or unsafe practice and potential failures in the college's safeguarding regime and know that such concerns will be taken seriously by the senior leadership team.
- 14.2. General guidance on whistleblowing can be found via: [Advice on Whistleblowing](#). The [NSPCC's what you can do to report abuse dedicated helpline](#) is available as an alternative route for staff who do not feel able to raise concerns regarding safeguarding and child protection failures internally or have concerns about the way a concern is being handled by the College. Staff can email help@nspcc.org.uk.
- 14.3. Individuals can also contact the charity PROTECT for confidential advice on whistleblowing issues. Contact details are available on their website:

<http://protect-advice.org.uk>

Telephone: Confidential Whistleblowing Advice: 020 3117 2520

15. Human Rights Act

- 15.1. The Human Rights Act 1998 (HRA) sets out the fundamental rights and freedoms that everyone in the UK is entitled to and contains the Articles and protocols of the European Convention on Human Rights (ECHR) (the Convention) that are deemed to apply in the UK. It compels public organisations to respect and protect an individual's human rights when they make individual decisions about them.
- 15.2. Under the HRA, it is unlawful for colleges to act in a way that is incompatible with the Convention. The specific convention rights applying to colleges are:
 - Article 3: the right to freedom from inhuman and degrading treatment (an absolute right);
 - Article 8: the right to respect for private and family life (a qualified right) includes a duty to protect individuals' physical and psychological integrity;
 - Article 14: requires that all of the rights and freedoms set out in the Act must be protected and applied without discrimination, 25; and
 - Protocol 1, Article 2: protects the right to education.
- 15.3. Being subjected to harassment, violence and or abuse, including that of a sexual nature, may breach any or all of these rights, depending on the nature of the conduct and the circumstances. Further information (including on absolute and qualified rights) can be found at [Human Rights | Equality and Human Rights Commission](#).

16. Equality Act 2010

- 16.1. Colleges have obligations under the Equality Act 2010 (the Equality Act).
- 16.2. According to the Equality Act, colleges **must** not unlawfully discriminate against learners because of their sex, race, disability, religion or belief, gender reassignment, pregnancy and maternity, or sexual orientation (protected characteristics).
- 16.3. Whilst all of the above protections are important, in the context of safeguarding, this guidance, and the **legal duties** placed on colleges in relation to safeguarding and promoting the welfare of children.
- 16.4. Provisions within the Equality Act allow colleges to take positive action, where it can be shown that it is proportionate, to deal with disadvantages affecting learners with a particular protected characteristic in order to meet their specific need, this includes a duty to make reasonable adjustments for disabled learners, including those with long term conditions. The college, could, for example, consider taking positive action to support girls if there was evidence they were being disproportionately subjected to sexual violence or sexual harassment.
- 16.5. Guidance to help colleges understand how the Equality Act affects them and how to fulfil their duties under the act can be found at [Equality Act 2010: advice for schools](#), it may also be useful for colleges. For further information [Equality Act guidance | Equality and Human Rights Commission](#).

17. Public Sector Equality Duty

- 17.1. The Public Sector Equality Duty (PSED) is found in the Equality Act. Compliance with the PSED is a legal requirement for state-funded colleges, advice on this – including on specific duties, is set out in the advice linked in paragraph 90.
- 17.2. The PSED places a general duty colleges to have, in the exercise of their functions, due regard to the need to eliminate unlawful discrimination, harassment and victimisation (and any other conduct prohibited under the Equality Act), to advance

equality of opportunity and foster good relations between those who share a relevant protected characteristic and those who do not. The duty applies to all protected characteristics (see paragraph 16.2) and means that whenever significant decisions are being made or policies developed, specific consideration must be given to the equality implications of these such as, for example, the need to eliminate unlawful behaviours that relate to them such as sexual violence and sexual harassment, misogyny/misandry and racism. This is one reason why good record-keeping and monitoring of all forms of abuse and harassment is essential.

- 17.3. The PSED helps colleges (which are subject to it) to focus on key issues of concern and how to improve learner outcomes. Some learners may be more at risk of harm from specific issues such as sexual violence, homophobic, biphobic or transphobic bullying or racial discrimination. Such concerns will differ between education settings, but it is important colleges are conscious of disproportionate vulnerabilities and integrate this into their safeguarding policies and procedures. For further information please see [Technical Guidance on the Public Sector Equality Duty: England | Equality and Human Rights Commission](#).

18. Information Sharing

- 18.1. Information sharing is vital in identifying and tackling all forms of abuse and neglect, and in promoting learner's welfare, including their educational outcomes. The College has clear powers to share, hold and use information for these purposes. If at any stage you are unsure about how or when to share information, you should seek advice from the DSL, DDSL or other designated members of staff with responsibility for safeguarding. You should also ensure that the outcome of the discussion is recorded.
- 18.2. Staff should be proactive in sharing information as early as possible to help identify, assess, and respond to risks or concerns about the safety and welfare of learners, whether this is when problems are first emerging, or where a learner is already known to the local authority children's or adult's social care. Fears about sharing information cannot be allowed to stand in the way of the need to safeguard and promote the welfare of learners at risk of abuse or neglect.
- 18.3. The Data Protection Act 2018, and the UK General Data Protection Regulation (UK GDPR) place duties on organisations and individuals to process personal information fairly and lawfully and to keep the information they hold safe and secure.
- 18.4. **The Data Protection Act 2018 and UK GDPR do not prevent, the sharing of information for the purposes of keeping learners safe. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of learners.**
- 18.5. Further details on information sharing can be found:
- in Chapter one of [Working Together to Safeguarding Children](#), which includes a myth-busting guide to information sharing
 - at [Information Sharing Advice for Practitioners Providing Safeguarding Services to Children, Young People & Parents and Carers](#). The seven golden rules for sharing information will be especially useful
 - at [The Information Commissioner's Office \(ICO\)](#), which includes information about your obligations and how to comply, including protecting personal information, and providing access to official information
 - in the [Data Protection: Toolkit for Schools](#) Guidance to support schools with data protection activity, including compliance with the UK GDPR.

18.6. **Appendix 5** provides a summary of the procedure for sharing information.

19. Opportunities to Teach Safeguarding

19.1. The Department has produced a one-stop page for teachers on GOV.UK, which can be accessed here: [Teaching about relationships sex and health](#). This includes teacher training modules on the RSHE topics and non-statutory implementation guidance. The following resources may also help colleges understand and teach about safeguarding:

- DfE advice for schools: [teaching online safety in schools](#);
- UK Council for Internet Safety (UKCIS) guidance: [Education for a connected world](#);
- UKCIS guidance: [Sharing nudes and semi-nudes: advice for education settings working with children and young people](#);
- The UKCIS [external visitors guidance](#) will help schools and colleges to ensure the maximum impact of any online safety sessions delivered by external visitors;
- National Crime Agency's CEOP education programme: [Thinkuknow](#);
- Public Health England: [Every Mind Matters](#); and
- [Harmful online challenges and online hoaxes](#) - this includes advice on preparing for any online challenges and hoaxes, sharing information with parents and carers and where to get help and support.

20. Online Safety

20.1. It is essential that learners are safeguarded from potentially harmful and inappropriate online material. SGS College has an effective approach to online safety designed to protect and educate the whole college community in their use of technology and establishes mechanisms to identify, intervene in, and escalate any concerns where appropriate. Appropriate filters and monitoring systems are in place in order to identify, intervene in, and escalate any incident where appropriate. More details are provided within the [Online Safety Policy](#).

20.2. SGS College's filtering and monitoring systems are effective and in line with [DfE's filtering and monitoring standards for schools and colleges](#). We have also implemented the DfE's [cyber security standards for schools and colleges](#).

20.3. Successful candidates are notified that online searches may be done as part of our recruitment process.

20.4. The breadth of issues classified within online safety is considerable, but can be categorised into four areas of risk:

- **Content:** being exposed to illegal, inappropriate or harmful content, for example: pornography, fake news, racism, misogyny, misandrist, self-harm, suicide, anti-Semitism, radicalisation and extremism.
- **Contact:** being subjected to harmful online interaction with other users; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.
- **Conduct:** personal online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and / or pornography, sharing other explicit images and online bullying; and

- **Commerce** - risks such as online gambling, inappropriate advertising, phishing and or financial scams. If you feel a learner or member of staff are at risk, please report it to the Anti-Phishing Working Group (<https://apwg.org/>)

21. Remote Learning

- 21.1. Where learners are being asked to learn online at home the DfE has provided advice to support colleges do so safely: [safeguarding in schools colleges and other providers](#) and [safeguarding and remote education](#). The NSPCC also provide helpful advice [Undertaking remote teaching safely during school closures](#)

22. Learners potentially at greater risk of harm

- 22.1. Whilst all learners should be protected, it is important to recognise that some groups of learners are potentially at greater risk of harm than others. The list below, is not exhaustive, but highlights some of those groups.

23. Learners who need a social worker (Child in Need & Child Protection Plans)

- 23.1. Learners may need a social worker due to safeguarding or welfare needs. Learners may need this help due to abuse, neglect and complex family circumstances. A learner's experiences of adversity and trauma can leave them vulnerable to further harm, as well as educationally disadvantaged in facing barriers to attendance, learning, behaviour, and mental health.

Local authorities should share the fact a learner has a social worker, and the designated safeguarding lead should hold and use this information so that decisions can be made in the best interests of the learner's safety, welfare, and educational outcomes. This should be considered as a matter of routine. There are clear powers to share this information under existing duties on both local authorities and colleges to safeguard and promote the welfare of learners.

Where learners need a social worker, this should inform decisions about safeguarding (for example, responding to unauthorised absence or missing education where there are known safeguarding risks) and about promoting welfare (for example, considering the provision of pastoral and / or academic support, alongside action by statutory services).

24. Learners Missing from Education

- 24.1. All staff should be aware that learners missing from education, particularly repeatedly, can act as a vital warning sign of a range of safeguarding issues including neglect, sexual abuse, and child sexual and criminal exploitation – particularly county lines. It is important that our response to persistently absent learners and learners missing from education supports identifying such abuse and helps prevent the risk of them going missing in the future. This includes when problems are first emerging but also where learners are already known to local authority children's social care and need a social worker (such as on a child in need or child protection plan, or as a looked after child), where going missing from education may increase known safeguarding risks within the family or in the community. All staff should be aware of the College's unauthorised absence and learners missing from education procedures set out in **Appendix 3**.

25. Looked after children and previously looked after children

- 25.1. The most common reason for children becoming looked after is as a result of abuse and / or neglect.

A previously looked after child potentially remain vulnerable, all staff should have the skills, knowledge and understanding to keep previously looked after children safe. When dealing with looked after children and previously looked after children, it is important that all agencies work together and prompt action is taken when necessary to safeguard these learners, who are a particularly vulnerable group.

26. Learners with special educational needs and disabilities or physical health issues

- 26.1. Learners with special educational needs or disabilities (SEND) or certain medical or physical health conditions can face additional safeguarding challenges both online and offline. Staff should be aware that additional barriers can exist when recognising abuse and neglect in this group of learners. These can include:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the learner's condition without further exploration;
- These learners being more prone to peer group isolation or bullying (including prejudice-based bullying) than other learners;
- The potential for learners with SEND or certain medical conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs;
- Communication barriers and difficulties in managing or reporting these challenges; and
- Cognitive understanding – being unable to understand the difference between fact and fiction in online content and then repeating the content / behaviours in college or the consequences of doing so.

27. Learners who are lesbian, gay, bi, trans or questioning (LGBTQ)

- 27.1. The fact that a learner may be LGBTQ is not in itself an inherent risk factor for harm. However, learners who are LGBTQ can be targeted by other learners. In some cases, a learner who is perceived by other learners to be LGBTQ (whether they are or not) can be just as vulnerable as children who identify as LGBTQ.

- 27.2. Risks can be compounded where learners who are LGBTQ lack a trusted adult with whom they can be open. It is therefore vital that staff endeavour to reduce the additional barriers faced, and provide a safe space for them to speak out or share their concerns with the DSL, DDSL or other designated members of staff with responsibility for safeguarding shown in the [SGS College Safeguarding Key Contacts List](#).

28. Work Experience Placements

- 28.1. Staff organising work experience placements should ensure that the placement provider has policies and procedures in place to protect learners from harm.
- 28.2. Barred list checks by the DBS might be required on some people who supervise a child under the age of 16 on a work experience placement. The College should consider the specific circumstances of the work experience. Consideration must be given to the nature of the supervision and the frequency of the activity being supervised, to determine what, if any, checks are necessary.

- 28.3. These considerations would include whether the person providing the teaching / training / instruction / supervision to the learner on work experience will be:
- unsupervised themselves; and
 - providing the teaching / training / instruction frequently (more than three days in a 30 day period, or overnight).
- 28.4. If the person working with the learner is unsupervised and the same person is in frequent contact with the learner, the work is likely to be regulated activity relating to children. If so, the College could ask the employer providing the work experience to ensure that the person providing the instruction or training is not a barred person.
- 28.5. The College is not able to request an enhanced DBS check with barred list information for staff supervising learners aged 16 to 17 on work experience.
- 28.6. If the activity undertaken by the learner on work experience takes place in a 'specified place', such as a school or sixth form college, and gives the opportunity for contact with children, this may itself be considered to be regulated activity relating to children. In these cases and where the learner doing the work experience is of 16 years of age or over, the work experience provider e.g. school or sixth form college should consider whether a DBS enhanced check should be requested for the learner in question. DBS checks cannot be requested for children under the age of 16.

29. Private Fostering - LA notification when identified

- 29.1. Private fostering occurs when a child under the age of 16 (under 18 for learners with a disability) is provided with care and accommodation by a person who is not a parent, person with parental responsibility for them or a relative in their own home.
- 29.2. A learner is not privately fostered if the person caring for and accommodating them has done so for less than 28 days and does not intend to do so for longer. Such arrangements may come to the attention of staff through the normal course of their interaction, and promotion of learning activities, with learners.
- 29.3. Where the arrangements come to the attention of the college (and the college is not involved in the arrangements), they should then notify the local authority to allow the local authority to check the arrangement is suitable and safe for the child. Colleges who are involved (whether or not directly) in arranging for a child to be fostered privately **must** notify local authorities of the arrangement as soon as possible after the arrangement has been made. Notifications **must** contain the information specified in Schedule 1 of The Children (Private Arrangements for Fostering) Regulations 2005 and **must** be made in writing.

30 Policy Implementation

- 30.1 SGS has a nominated Governor with specific responsibility for Safeguarding Learners and Child Protection.
- 30.2 A senior member of staff from the College Senior Leadership Team (SLT) is appointed to the role of Designated Safeguarding Lead (DSL). The specific responsibilities of the DSL are described in **Appendix 1**.
- 30.3 Contact details for other designated members of staff with responsibility for Safeguarding Learners and Child Protection are shown on the [SGS College Safeguarding Key Contacts List](#).

31 Enforcement

- 31.1 Any failure to adhere to this policy, or to comply with related procedures may result in disciplinary action.

32 Related Policies, Procedures, Charters, Plans, Guidance and Legislation

- 32.1 [Education & Training \(Welfare of Children\) Act 2021](#)
- 32.2 [Information Sharing, Advice for practitioners providing safeguarding services to children, young people, parents & carers](#)
- 32.3 [Inspecting Further Education & Skills: Guidance for Providers](#)
- 32.4 [Keeping Children Safe in Education 2023](#)
- 32.5 [Keeping Children Safe in Education 2023, Part 1 information for all school & college staff](#)
- 32.6 [Mandatory Reporting of Female Genital Mutilation – procedural information](#)
- 32.7 [NSPCC](#)
- 32.8 [NSPCC Whistleblowing Advice Line](#)
- 32.9 [Professional and Personnel Relationships \(safeguardingchildren.co.uk\)](#)
- 32.10 [Prevent Duty Guidance for Further Education Institutes in England and Wales](#)
- 32.11 [Preventing Youth Violence and Gang Involvement](#)
- 32.12 [Safeguarding Vulnerable Groups Act 2006](#)
- 32.13 [Safer Recruitment Consortium](#)
- 32.14 [SGS College Abuse of Trust Policy & Procedure](#)
- 32.15 [SGS College Learner Anti-Bullying & Harassment Policy & Procedure](#)
- 32.16 [SGS College External Speakers & Freedom of Speech Guidelines](#)
- 32.17 [SGS College Fitness to Study](#)
- 32.18 [SGS College IT Acceptable Use Policies \(Email; Mobile Devices; Social Networking; Users; and Security\)](#)
- 32.19 [Guidelines on maintaining professional boundaries \(including use of social media\)](#)
- 32.20 [SGS College Online Safety Policy](#)
- 32.21 [SGS College Photographic & Visual Media Policy](#)
- 32.22 [SGS College Positive Behaviour Policy 2022 -2023](#)
- 32.23 [SGS College Recruitment Procedure](#)
- 32.24 [SGS College References Policy & Procedure](#)
- 32.25 [SGS College Staff Code of Conduct](#)
- 32.26 [SGS College Trips Policy & Procedure](#)
- 32.27 [SGS College Whistleblowing \(Public Interest Disclosure\) Policy & Procedure](#)
- 32.28 [South West Child Protection Procedures](#)
- 32.29 [The Children’s Act 2004 \(sections 11 & 16\)](#)
- 32.30 [What to do if you’re worried a child is being abused: Advice for Practitioners](#)
- 32.31 [Working Together to Safeguard Children 2018](#)
- 32.32 [When to call the police Advice for schools and colleges](#)

33 Impact

- 33.1 The impact of this policy and related procedures is to minimise safeguarding risks for our learners and staff and to ensure that any concerns are acted on in accordance with this policy and related legislation and guidance.

34. MANDATORY INITIAL IMPACT SCREENING



Completed by:

Name: Moira Foster-Fitzgerald | Title: Chief Group Services Officer | 26/07/2023

I have read the guidance document: Completing a Policy Impact Assessment?

If this policy has been up-dated, please tick to confirm that the initial impact screening has also been reviewed:

EQUALITY AND DIVERSITY IMPACT ASSESSMENT

Characteristic	This policy seeks to:	
Age	No appreciable impact	
Disability	Treat with equal dignity, all learners and staff; and monitor participation, performance and progress of learners and staff with disabilities and act to address inequalities.	
Faith or Belief	No appreciable impact	
Gender	No appreciable impact	
Race or Ethnicity	No appreciable impact	
Orientation	Treat the College's LGBTQQIAAP community with equal dignity and fairness	
Gender reassignment	Work with individuals to ensure appropriate support at identified periods	
Economic disadvantage	Use available resources to identify and address any issues of inequality as a result of social and economic factors. Supporting learners and staff, both academically and pastorally in order for all to be successful	
Rural isolation	No appreciable impact	
Marriage	No appreciable impact	
Pregnancy & maternity	No appreciable impact	
Carers & care leavers	Use available resources to identify and address any issues of inequality as a result of being in care or a care leaver. Supporting learners both academically and pastorally in order to be successful.	
Vulnerable persons	Use available resources to identify and address any issues of inequality as a result of being a vulnerable person. Supporting learners both academically and pastorally in order to be successful.	
Please identify any sections of the policy that specifically seek to maximise opportunities to improve diversity within any of the College's stakeholder groups:		
Please identify any sections of the policy that specifically seek to improve equality of opportunity within any of the College's stakeholder groups:		
Is there any possibility that this policy could operate in a discriminatory way?	<input type="checkbox"/>	<input checked="" type="checkbox"/> * If you have ticked yes (red), which characteristic will be most affected? Choose an item.
If yes please confirm that the Policy has been sent for a full Equality & Diversity Impact Assessment, and note the date:	<input type="checkbox"/>	Click or tap to enter a date.

Note: if the policy does not seek to increase diversity or improve equality you should go back and review it before submitting it for approval.

MAPPING OF FUNDAMENTAL RIGHTS

Which United Nations Convention on the Rights of the Child (UNCRC), Right does this policy most protect:	Art. 3 Best interests of the child Art. 19 Protection from violence, abuse & neglect Arts. 34/35/36 Protection from sexual and other exploitation
Which Human Right (HRA) does this policy most protect:	Art. 5 Right to liberty and security Choose an item.

DATA PROTECTION & PRIVACY BY DESIGN SCREENING

Tick to confirm that you have considered any data protection issues as part of the design and implementation of this policy; and, that implementing this policy will <u>not</u> result in the collection, storage or processing of personal data outside of official College systems:	<input checked="" type="checkbox"/>
Tick to indicated that this policy has or requires a Data Privacy Impact Assessment:	<input type="checkbox"/>

Appendix 1 – Role of the Designated Safeguarding Lead (DSL)

The activities listed below can be delegated to appropriately trained deputies but the ultimate lead responsibility remains with the DSL.

Availability

During term time the DSL or DDSL's will be available during College hours for staff to discuss any safeguarding concerns.

Manage Referrals

The designated safeguarding lead is expected to refer cases:

- of suspected abuse and neglect to the local authority children's or adult's social care as required and support staff who make referrals to local authority children's or adult's social care;
- to the Channel programme where there is a radicalisation concern as required and support staff who make referrals to the Channel programme;
- where a person is dismissed or left due to risk / harm to a learner to the Disclosure and Barring Service as required; and
- where a crime may have been committed to the Police as required. [Child Centred Policing – When to call the police](#) should help understand when to consider calling the police and what to expect when working with the police.

Work with Others

The Designated Safeguarding Lead is expected to:

- Act as a source of support, advice and expertise for all staff;
- Act as a point of contact with the three safeguarding partners;
- Liaise with the Principal to inform them of issues - especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations; This should include being aware of the the requirement for children to have an appropriate adult. Further information can be found in the statutory guidance – [PACE Code C 2019](#)
- As required, liaise with the “case manager” and the LADO for child protection concerns in cases which concern a staff member;
- Liaise with staff (especially teachers, pastoral support staff, IT Technicians, senior mental health leads and SENCOs or the named person with oversight for SEN) on matters of safety and safeguarding (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies so that learner's needs are considered holistically;
- Liaise with the senior mental health lead and where available, the mental health support team, where safeguarding concerns are linked to mental health;
- Promote supportive engagement with parents and / or carers in safeguarding and promoting the welfare of learners, including where families may be facing challenging circumstances;
- Work with the principal and relevant strategic leads, taking lead responsibility for promoting educational outcomes by knowing the welfare, safeguarding and child protection issues that children in need are experiencing, or have experienced, and identifying the impact that these issues might be having on learner's attendance, engagement and achievement at college. This includes:
 - Ensure that the college knows who its cohort of learners who have or have had a social worker are, understanding their academic progress and attainment, and maintaining a culture of high aspirations for this cohort; and

- Supporting teaching staff to provide additional academic support or reasonable adjustments to help learners who have or have had a social worker reach their potential, recognising that even when statutory social care intervention has ended, there is still a lasting impact on learner's educational outcomes.

Information Sharing and Managing the Child Protection File

The designated safeguarding lead is responsible for ensuring that child protection files are kept up to date.

Information should be kept confidential and stored securely. It is good practice to keep concerns and referrals in a separate child protection file for each learner.

Records should include:

- A clear and comprehensive summary of the concern;
- Details of how the concern was followed up and resolved;
- A note of any action taken, decisions reached and the outcome.

They should ensure the file is only accessed by those who need to see it and where the file or content within it is shared, this happens in line with information sharing advice as set out in Part one and Part two of KCSIE 2023.

Where learners leave the school or college (including in year transfers) the designated safeguarding lead should ensure their child protection file is transferred to the new school or college as soon as possible, and within 5 days for an in-year transfer or within the first 5 days of the start of a new term. This should be transferred separately from the main learner file, ensuring secure transit, and confirmation of receipt should be obtained. Receiving schools and colleges should ensure key staff such as designated safeguarding leads and SENCOs or the named person with oversight for SEN in colleges, are aware as required.

Lack of information about their circumstances can impact on the learner's safety, welfare and educational outcomes. In addition to the child protection file, the designated safeguarding lead should also consider if it would be appropriate to share any additional information with the new school or college in advance of a learner leaving to help them put in place the right support to safeguard this learner and to help the learner thrive in the school or college. For example, information that would allow the new school or college to continue supporting learners who have had a social worker and have experienced abuse and have that support in place for when the learner arrives.

Raise Awareness

The Designated Safeguarding Lead should:

- Ensure each member of staff has access to, and understands, the college's safeguarding policy and procedures, especially new and part-time staff;
- Ensure the College's safeguarding policy & procedure is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with the Governing Body regarding this;
- Ensure the safeguarding policy & procedure is available publicly and parents are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the College in this;

- Link with the safeguarding partner arrangements to make sure staff are aware of any training opportunities and the latest local policies on local safeguarding arrangements; and
- Help promote educational outcomes by sharing the information about the welfare, safeguarding and children protection issues that learners who have to have had a social worker are experiencing with teachers and the college leadership team.

Training

The Designated Safeguarding Lead (and any deputies) should undergo training to provide them with the knowledge and skills required to carry out the role. This training should be updated at least every two years. The Designated Safeguarding Lead should undertake Prevent awareness training. Training should provide designated safeguarding leads with a good understanding of their own role, how to identify, understand and respond to specific needs that can increase the vulnerability of learners, as well as specific harms that can put learners at risk, and the processes, procedures and responsibilities of other agencies, particularly children's social care, so they:

- Understand the assessment process for providing early help and statutory intervention, including local criteria for action and local authority children's social care referral arrangements;
- Have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so;
- Understand the importance of the role of designated safeguarding lead has in providing information and support to children social care in order to safeguard and promote the welfare of learners;
- Understand the lasting impact that adversity and trauma can have, including on learner's behaviour, mental health and wellbeing, and what is needed in responding to this in promoting education outcomes;
- Are alert to the specific needs of children in need, those with special educational needs and disabilities (SEND), those with relevant health conditions and young carers;
- Understand the importance of information sharing, both within the college, and with the safeguarding partners, other agencies, organisations and practitioners;
- Understand and support the College with regards to the requirements of the Prevent duty and are able to provide advice and support to staff on protecting children from the risk of radicalisation;
- Are able to understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep learners safe whilst they are online at College;
- Can recognise the additional risks that learners with SEN and disabilities (SEND) face online, for example, from online bullying, grooming and radicalisation and are confident they have the capability to support SEND learners to stay safe online;
- Obtain access to resources and attend any relevant or refresher training courses; and
- Encourage a culture of listening to learners and taking account of their wishes and feelings, among all staff, in any measures the College may put in place to protect them.

In addition to the formal training set out above, their knowledge and skills should be refreshed (this might be via e-bulletins, meeting other designated safeguarding leads, or simply taking time to read and digest safeguarding developments) at regular intervals, as required, and at least annually, to allow them to understand and keep up with any developments relevant to their role.

Providing Support to Staff

Training should support the designated safeguarding lead in developing expertise, so they can support and advise staff and help them feel confident on welfare, safeguarding and child protection matters. This includes specifically to:

- Ensure that staff are supported during the referrals processes; and
- Support staff to consider how safeguarding, welfare and educational outcomes are linked, including to inform the provision of academic and pastoral support.

Understanding the Views of Learners

It is important that learners feel heard and understood. Therefore, designated safeguarding leads should be supported in developing knowledge and skills to:

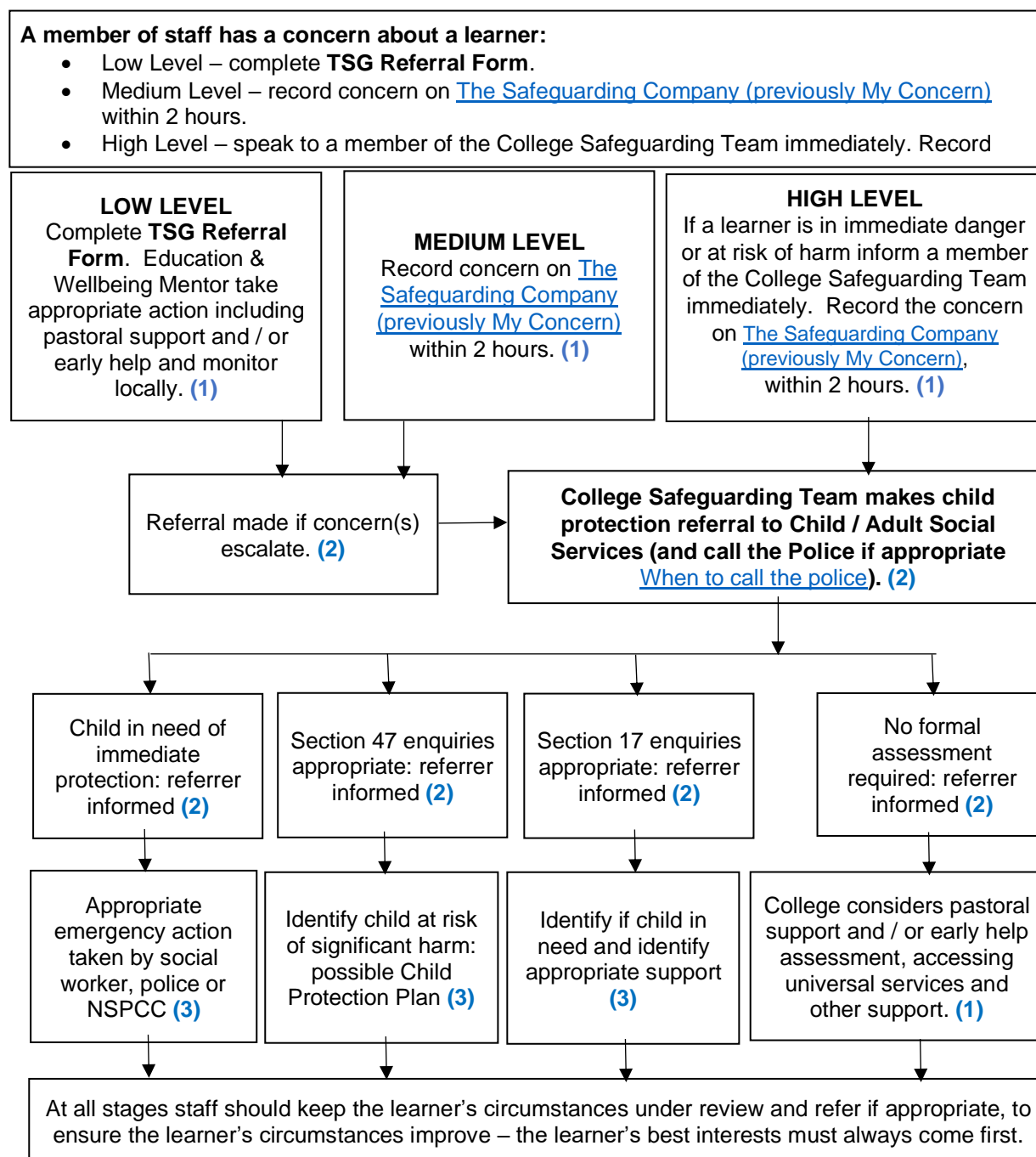
- Encourage a culture of listening to learners and taking account of their wishes and feelings, among all staff, and in any measures the college may put in place to protect them; and
- Understand the difficulties that learners may have in approaching staff about their circumstances and consider how to build trusted relationships which facilitate communication.

Holding and Sharing Information

The critical importance of recording, holding, using and sharing information effectively is set out in Parts one, two and five of [KCSIE 2023](#), and therefore the designated safeguarding lead should be equipped to:

- Understand the importance of information sharing, both within the school and college, and with other schools and colleges on transfer including in-year and between primary and secondary education, and with the safeguarding partners, other agencies, organisations and practitioners;
- Understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR); and be able to keep detailed, accurate, secure written records of concerns and referrals and understand the purpose of this record-keeping.

Appendix 2 - Procedure for concerns about the abuse of a Learner



- (1) Early help means providing support as soon as a problem emerges at any point in a child's life. Where a child would benefit from co-ordinated early help, an early help inter-agency assessment should be arranged.
- (2) Under the Children's Act 1989, local authorities are required to provide services for children in need for the purpose of safeguarding and promoting their welfare. Children in need may be assessed under section 17. Under section 47, where a local authority has reasonable cause to suspect that a child is suffering or likely to suffer significant harm, it has a duty to make enquiries to decide whether to take action to safeguard or promote the child's welfare.
- (3) This could include applying for an Emergency Protection Order (EPO).

Appendix 3 - Procedure for Learners Missing Education

SGS College has put these guidelines in place, to ensure appropriate safeguarding responses to learners 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 going missing. Where reasonably possible, the College aims to hold more than one emergency contact number for each learner. To give us additional options to contact a responsible adult when a learner missing education is also identified as a welfare and / or safeguarding concern.

Children Missing Education (CME)

Due to the daily contact that staff have with learners, as a sector we are often well placed to notice when a learner has gone missing. When a learner or sibling group are withdrawn from college, or appear to have gone missing, staff should raise a concern via [The Safeguarding Company \(previously My Concern\)](#) software and make every effort to trace the learner as soon as it is apparent that the period of absence is unusual in any way.

Local Authorities have the lead statutory responsibility to identify, as far as possible to do so, children missing education and get them back into education. All schools, colleges and the local authority should:

- promote good attendance and reduce absence;
- ensure every learner has access to full-time education; and
- act early to address patterns of absence.

Parents have a duty to ensure their child of compulsory school age receives suitable full-time education. Although children can leave school on the last Friday in June if they will be 16 by the end of the summer holidays, they must do one of the following until they are 18:

- stay in full-time education, for example at a college;
- start an apprenticeship or traineeship; or
- Spend 20 hours or more a week working or volunteering, while in part-time education or training.

SGS College Responsibilities

If a learner fails to attend college or the arranged education provision, the college must establish the reason for absence and mark the register accordingly. The college should follow up absence to:

- ascertain and record the reason for absence;
- identify whether the absence is approved or not;
- identify the correct code to use before entering it on the College's electronic system; and
- ensure the proper safeguarding action is taken.

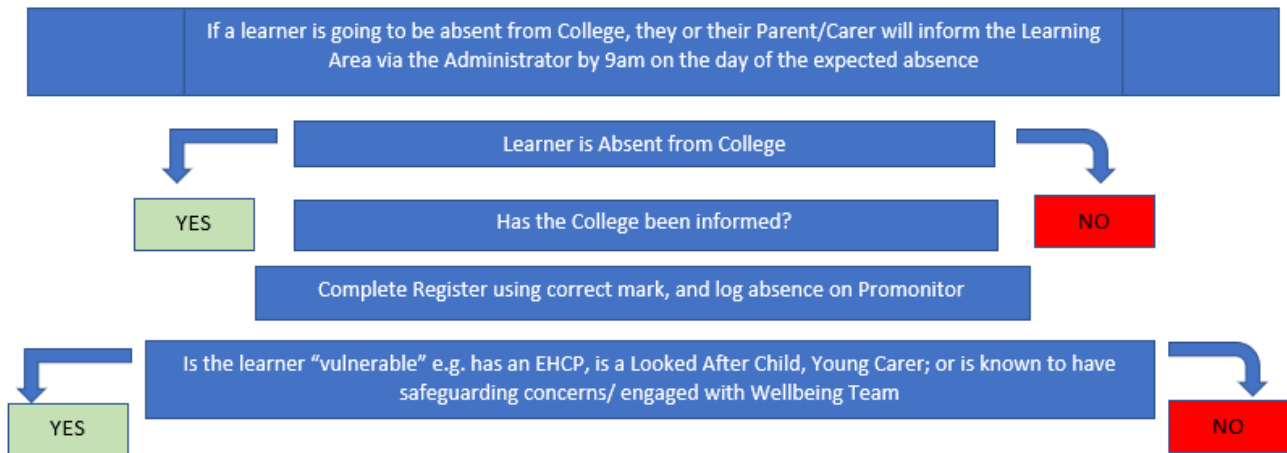
Following two weeks of continuous unexplained absence (regardless of the study timetable) staff should alert the Safeguarding Team by recording a concern on [The Safeguarding Company \(previously My Concern\)](#) system. The concern should include the steps already taken to contact the learner / family and any other relevant information gained to establish the reason for absence. The Safeguarding Team will then notify the Local Authority responsible to track young people's participation in education and training Post 16.

If the college is of the belief that the learner has moved away notification to the local authority must be made earlier. Learners with a history of poor attendance and / or welfare concerns should be followed up immediately by the college.

Learner Missing Education Procedure

If a learner is going to be absent from College, the learner, parent(s) / carer(s) should contact the College (either their Tutor or Curriculum Administrator) before 09:30 on the day of absence to inform us that the learner is not able to attend and the reason why.

Children Missing in Education Procedure



Day 1

- ✦ Check if course administrator / tutor(s) have received absence notification via email; ProMonitor or Teams.
- ✦ Contact the learner via email; phone or Teams.
- ✦ Tutor call and email parent(s) / carer(s) and emergency contact(s).
- ✦ Student Administrator for the Learning Area attempts to contact Learner and/or Next of Kin or Emergency Contact.
- ✦ Log absence on Pro-Monitor.
- ✦ Copy in Wellbeing Mentor to Pro-Monitor comment.

Day #1 Tutors must:

- Check if Administrator/Tutor has received absence notification via email/TEAMs/Phone/ProMonitor
- Contact the learner via email/TEAMs/Phone
- Ascertain the reason for absence and log on ProMonitor

Day #2 – learner is still absent and no contact has been made

- Call and email parents/carers and emergency contacts
- Log absence on ProMonitor

Day 3 – Learner is absent and no contact has been made

- Student Administrator for the Learning Area attempts to contact the learner and/or Next of Kin or Emergency Contact. Learning Area sends out letter of non-attendance to learner’s home address

Day #5

- Student Administrator continues to attempt to make contact

Day #7 – Learner is Under 18, absent and no contact has been made

- Tutor must report a concern on MyConcern and outline the steps already taken to contact the learner and/or parents/carers and any other relevant information

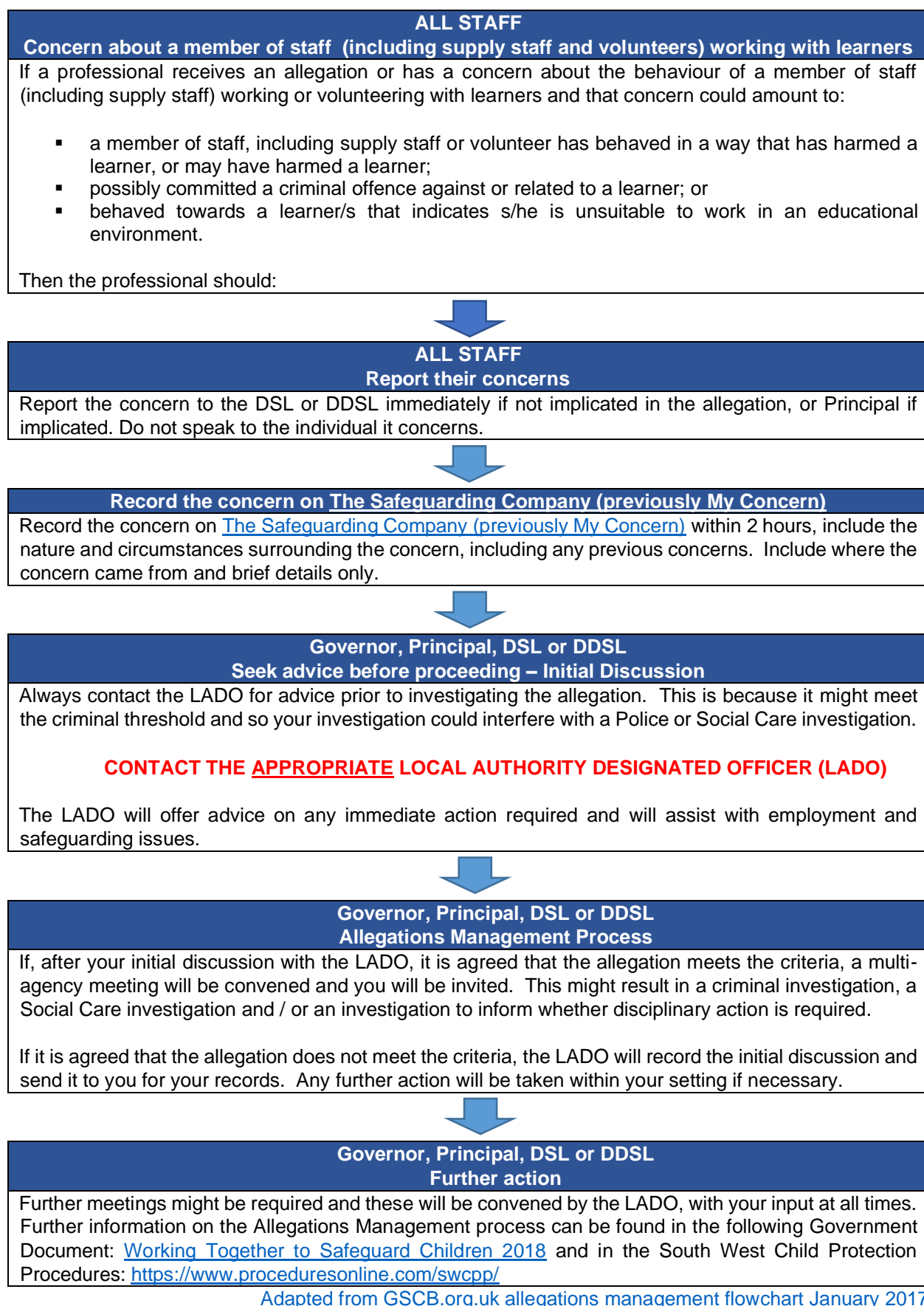
If you have information which increases the vulnerability of a learner and they have not attended College – please use the escalation procedure below

Learner is subject to a Child in Need or Child Protection Plan/Disclosed a Safeguarding Concern
 High Needs Learner has left Campus without permission
 High Needs learners has not arrived by 3pm and we are unable to contact

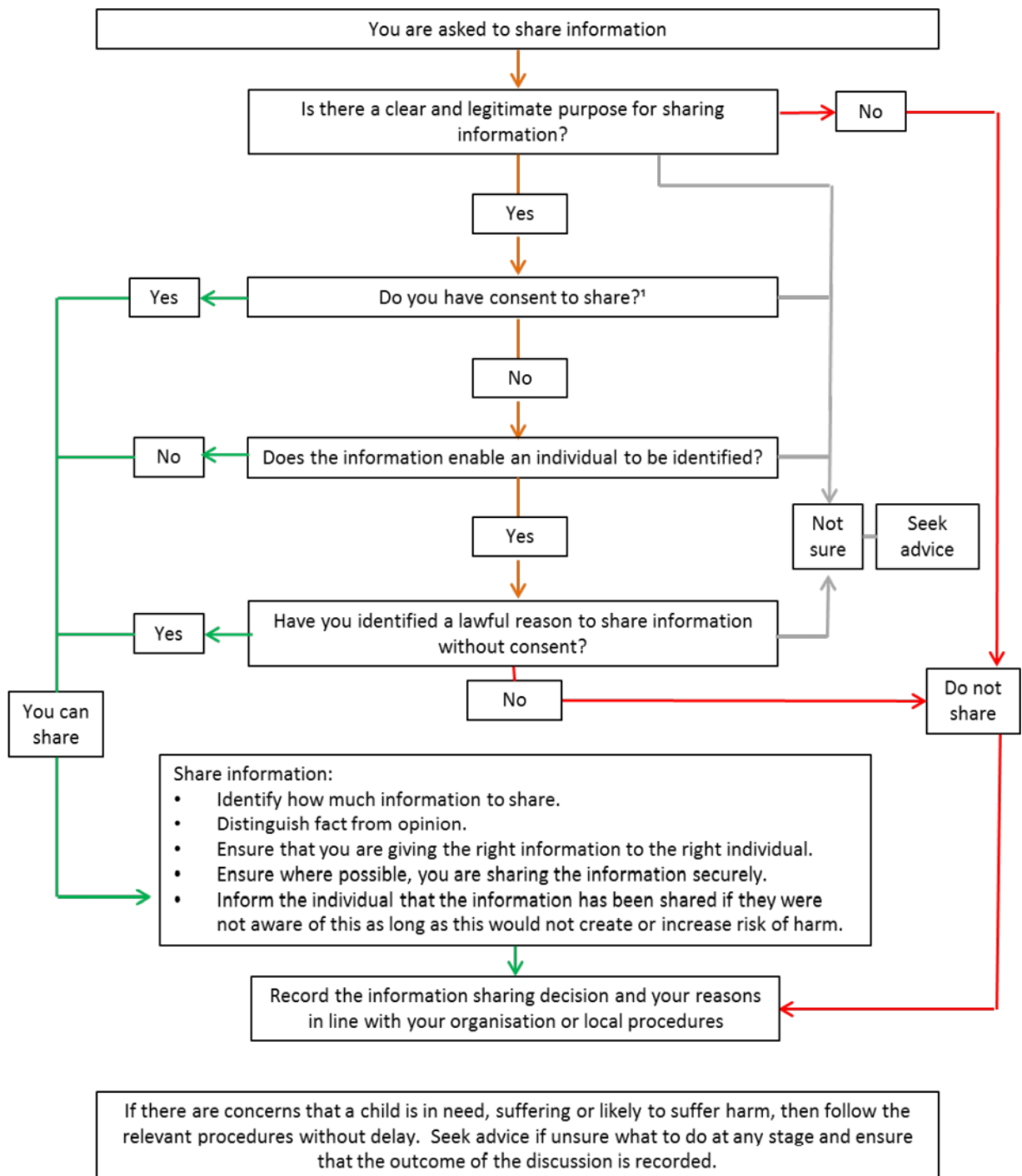
Complete the register using the correct mark at the start of the session
 Log absence on ProMonitor and include Education & Wellbeing Mentor
 Report a concern on MyConcern – include steps already taken to contact learner and parent(s)/carer(s) plus other relevant information
 Safeguarding Team call 101 and request a welfare check

If a learner has not arrived home as per their usual routine, parents/carers should be advised to alert the Police if they themselves cannot contact the learner

Appendix 4 – Summary of Allegations Management Procedures for Allegations / Concerns that may meet the threshold



Appendix 5 - Information sharing, Advice for practitioners providing safeguarding services to learners, parents and carers (July 2018)



1. Consent must be unambiguous, freely given and may be withdrawn at any time